

# DIAMOND CREEK

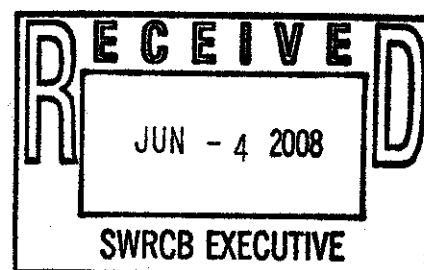
P A R T N E R S, L T D

Public Comment  
Draft Construction Permit  
Deadline: 6/11/08 by 12 p.m.

**SENT VIA FAX**  
916-341-5620

June 4, 2008

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



**Re: Comment Letter – Draft Construction Permit**

Dear Control Board Members:

Below are comments I wish to share regarding the Draft Construction Permit:

1. A project site should be able to design to a certain rainfall per inch in a specific time period. Without such a design standard, catastrophic rainfall or storms are treated the same as a rain shower on failure, and it creates an impossible standard to meet, since there is no standard rainfall event.
2. Using flocculants to bring NTU levels down is harmful to aquatic life. Aquatic life can deal better with high NTU's over poisonous chemicals. Instead, allow higher NTU's.
3. Training classes for SWPPP's management and sampling should have specific requirements and certifications.
4. NOI Permits – Start date needs to be tied to final City or County permit documentation, after the State NOI permit review.
5. Water Board should recommend a list of acceptable turbidity meters and P.H. testing products and other clear standards used for evaluation.

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6. Water Board should give examples of testing sampling locations on sites with and without nearby drainage and water flow that are site specific for each project.

Respectfully submitted,

Diamond Creek Partners, LTD.,  
a California limited partnership



Stephen L. Des Jardins  
President of Diamond Equities, Inc.

SLD/jb