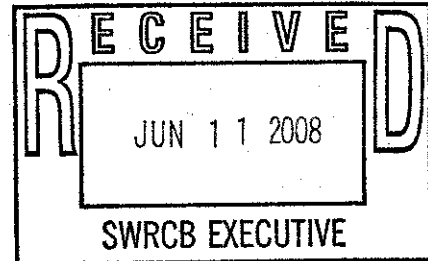




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June 11, 2008

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



Dear Ms. Townsend:

On behalf of my company, I am writing to express concerns regarding the proposed Draft General Permit for Discharges of Storm Water Associated with Construction Activities ("the Permit") now being considered by the State Water Resources Control Board (SWRCB).

As a homebuilding and land development professional, I have had regular experience in successfully managing storm water runoff from both small & large-scale construction sites, including master-planned communities and individual home sites. I am troubled, therefore, by the drastic changes in storm water runoff management called for in the Permit. The extremes of those changes seem unnecessary given the track record of homebuilders' "best management practices". Instead of improving the best management practice approach, the permit will simply create confusion and uncertainty and lead to increased housing costs.

Some of the Permit's new requirements make no sense. For example, the Permit adopts complicated and costly new sediment-content standards (NELS) that the SWRCB's own blue-ribbon panel rejected due to the current lack of data and necessary technology. Additionally, Numeric Action Levels and other detailed practices make the Permit even more confusing, requiring even the smallest site to employ dedicated consultants and specialists, greatly increasing costs. This and other new requirements are proposed without any demonstration that they will produce any marked improvement water quality.

While I join with California homebuilders in supporting improvements to the management of storm water runoff, those changes should be practicable, workable and should lead to certain improvements in water quality.

Regrettably, the Permit in its present form appears to fail at meeting those reasonable tests. Accordingly, I urge the SWRCB to resolve the Permit's defects and inconsistencies before moving forward on its adoption.



# SunCal Companies

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Adopting these standards would put an undue burden on homebuilders, even the smallest, raising the cost of construction dramatically, and thereby home prices, at a time when affordable housing is a growing concern.

Sincerely,

Steve Howell  
Division President