

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

**From:** "Steve Madison" <smadison@biacc.com>  
**To:** commentletters@waterboards.ca.gov  
**Date:** Mon, Jun 9, 2008 1:50 PM  
**Subject:** Comment Letter: Draft Construction Permit

Clerk to the Board Townsend:

I am the executive officer of the Building Industry Association of Central California. We have approximately 350 member organizations. The member organization's from our association employ thousands in the Northern San Joaquin Valley. During strong housing cycles, our members employ thousands more. Direct and indirect spending from activity around home building stimulates our local economy and provides tax revenue to the coffers of local and state governments.

On behalf of my organization, 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 professional, I advise my members how to successfully manage stormwater runoff from construction sites. I am troubled, therefore, by the drastic changes in stormwater 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 (numeric effluent limits) that the SWRCB's own blue-ribbon panel rejected due to the current lack of data and necessary technology. 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 stormwater 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.

We understand and endorse rational regulations to protect the environment. However, rules that are onerous to apply and expensive to document will only prolong the economic challenges we face in California.

We urge the revision of proposed Permit to reflect the concerns mentioned in this message.

Sincerely,

Steve Madison  
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