



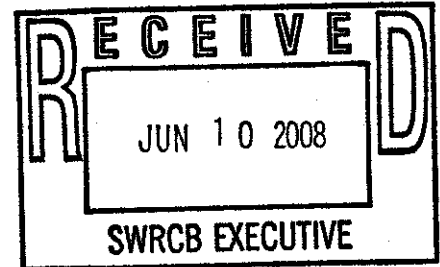
# CCL ENGINEERING INC.

CIVIL ENGINEERING • SURVEYING • GEOTECHNICAL ENGINEERING

June 11, 2008

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

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



Dear Ms. Townsend:

On behalf of CCL Engineering 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 Civil Engineering professional who has had regular experience in observing the successful management of stormwater runoff from construction sites. I am troubled 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.

Sincerely,  
CCL Engineering, Inc.

*Karl Mallick*

Karl Mallick, P.E., L.S.  
Principal

43434 Sahuayo Street • Lancaster, CA 93535  
(661) 949-9500 • FAX (661) 949-8380



# **CCL ENGINEERING INC.**

**CIVIL ENGINEERING • SURVEYING • GEOTECHNICAL ENGINEERING**

