

**From:** "Timothy Murphy, Vice-Chair Govt. Rel." <timothy.murphy@gencorp.com>  
**To:** commentletters@waterboards.ca.gov  
**Date:** Mon, Jun 9, 2008 11:14 AM  
**Subject:** Comment Letter "Draft Construction Permit"

Clerk to the Board Townsend:

The Rancho Cordova Chamber of Commerce is a business organization comprised of almost 450 members in Rancho Cordova, California. As the membership organization of business, we promote our community's economic vitality and quality of life through leadership development, advocacy, facilitation and education.

On behalf of our member businesses, 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).

Rancho Cordova is a growing city, and has many areas identified for residential and commercial development. This development has been identified as an appropriate place for the region to grow through the Sacramento Area Council of Government's historic "Blueprint" land planning process.

With the current housing market, the Rancho Cordova Chamber advocates for regulations that ease the burden of costs and fees to homebuilders.

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.

On behalf our membership, I urge you to reject the proposed Draft General Permit for Discharges of Storm Water Associated with Construction Activities.

Sincerely,

Timothy Murphy, Vice-Chair Govt. Rel.  
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