



City of Huntington Beach

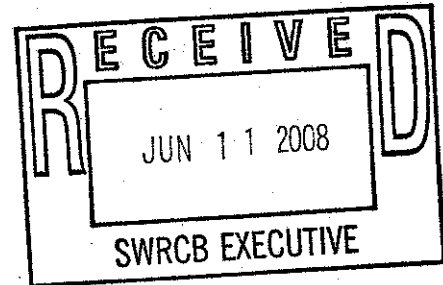
2000 Main Street ♦ PO Box 190 ♦ CA 92648

Travis K. Hopkins, PE
Director

Department of Public Works
(714) 536-5431

June 11, 2008

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



Submitted via email commentletters@waterboards.ca.gov

Subject: Comments on the Draft Construction Permit

We appreciate the opportunity to provide comments on the proposed Construction Permit. The City appreciates the efforts the State Water Quality Control Board has made to address the water quality concerns associated with construction sites and believes the issue is one that needs to be addressed.

The City was pleased to see several improvements to the permit language resulting from the Preliminary Draft Permit and subsequent stakeholder process, however continues to have concerns associated with the draft permit. The City is a member of the California Stormwater Quality Association (CASQA) and supports the comments detailed in their June 10, 2008 letter. In an effort to streamline the comments, the CASQA comments will not be restated herein, however, the City would like to highlight the specific comments addressed below:

Capital Improvement Projects:

Section II.B of the Fact Sheet indicates that projects included in a municipality's Capital Improvement Project Plan are subject to the requirements of the General Permit. The City's Capital Improvement Project Plan includes numerous small projects (less than one acre) that are ongoing and already have water quality protection measures requirements as implemented in the City's municipal NPDES program; therefore, we recommend that only projects that result in the disturbance of soil equal to or greater than one acre be subject to the General Permit.

Monitoring:

It is recommended that only projects that discharge directly into a receiving waterbody be required to conduct sampling. A suggested solution would be to apply the monitoring requirement only to sites located approximately 200 feet from a receiving waterbody.

Risk Factor:

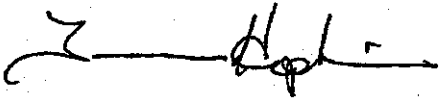
The risk based system included in the permit does not include implementation measures that are corresponding in size, extent, amount or degree to the risk level, therefore additional items and means to differentiate between projects should be considered. The current permit would result in minimal differentiation amongst sites, with most being categorized as high or medium. It is recommended that consideration should be given to the project size, that the base score in the receiving water analysis be deleted, and that the use of channel stability be reconsidered.

Sediment Controls:

Clarification is needed to Paragraph VIII.D.3 which requires erosion and sediment controls on active areas of the construction site. Erosion controls should not be required on areas that will be actively graded within the upcoming month.

Thank you for the opportunity to provide comments on the Construction Permit. Please contact Geraldine Lucas at (714) 375-8494 if you have any questions regarding these comments.

Sincerely,



Travis K. Hopkins, PE
Director of Public Works

TKH/GL:cs

Cc: Paul Emery, Acting City Administrator
Todd Broussard, Acting City Engineer
Geraldine Lucas, Principal Civil Engineer