

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

From: "Michael Prandini" <mikep@biasjv.org>
To: commentletters@waterboards.ca.gov
Date: Mon, Jun 9, 2008 3:56 PM
Subject: Comment Letter: Draft Construction Permit

Clerk to the Board Townsend:

On behalf of the Building Industry Association of Fresno/Madera Counties, 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).

Ashomebuilding professional, my members have had regular experience in successfully managing stormwater runoff from construction sites. I am troubled, therefore, by the drastic changes in stormwater runoff management called for in the proposed 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 in water quality.

My members join with California homebuilders in supporting improvements to the management of stormwater runoff that are practicable, workable and lead to 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,

Michael Prandini
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