

**From:** "Paul Huddleston, Jr" <phuddleston@hunsaker.com>  
**To:** commentletters@waterboards.ca.gov  
**Date:** Mon, Jun 9, 2008 5:05 PM  
**Subject:** Comment Letter: Draft Construction Permit

Clerk to the Board Townsend:

I am writing this letter to express my concerns about the new requirements for water quality currently being studied by the state.

On behalf of my company, 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 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 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 support having the best drinking water world (which we currently have!!!!) but the existing requirements are already putting a significant burden on the developers (estimated to be \$30,000 per house under the current guidelines) and achieve only marginal effect on overall water quality. I'm a big believer in getting the most bang for your buck and I feel we are spending incredible amounts of money and achieving only very minor improvements in water quality.

Sincerely,

Paul Huddleston, Jr  
Principal  
Hunsaker & Associates  
2900 Adams St Ste A-15  
Riverside, CA 92504

