



October 6, 2010

Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
Attention: Kathleen Cole Harder

Re: SRCSD Draft Permit

To Whom It May Concern:

On behalf of Granite Construction Company, I am writing to express our serious concern over the CVRWQCB's draft permit recommendations. The recommendations are unreasonably burdensome, going well beyond what is "reasonable and necessary" under the Clean Water Act and enters into policy-setting based on perception and not based on a documented public health problem or existing standards/criteria. Implementation of the permit conditions and the resulting increased rates and fees would have a negative impact on the Sacramento Region economy, including local taxpayers, businesses and the development community. Also, the economic impact on Sacramento is unduly burdensome given that other California Regions will receive economic benefit without contributing to payment of the costs.

Future development of Granite aggregate mining property within the County for adaptive reclamation and re-use would likely be prevented due to the potential increased impact fees resulting from the costs to increase the level of wastewater treatment as outlined in the draft permit. Examples of potentially impacted Granite properties include further development at Granite Regional Park where County residents work at the offices and also enjoy the park amenities (ball fields, skate and dog park, etc.) as well as planned development at Granite's currently active Vineyard aggregate mine.

We request that the CVRWQCB give appropriate consideration to the severe economic impact that implementing this permit would have on the Sacramento Region especially since the underlying scientific evidence at this stage appears questionable. The draft permit conditions could significantly harm the economic recovery in the Region due to the significant increases of customer rates and higher fees on new development and business being proposed. We believe that additional studies and testing should be performed to obtain better consensus around the science that future permit conditions should be based upon.

Sincerely,

A handwritten signature in blue ink that reads "Scott Wolcott".

Scott Wolcott
Vice President – Land & Quarry
Granite Construction Company