

TO: Central Valley Regional Water Quality Control Board

FROM: Sacramento Regional Builders Exchange

DATE: September 7th, 2010

RE: **CVRWQCB Tentative Discharge Permit – Strongly Opposed**

The Sacramento Regional Builders Exchange (SRBX) strongly opposes the Central Valley Regional Water Quality Control Board's (CVRWQCB) draft permit recommendations. The recommendations go far beyond what is federally mandated or scientifically proven. To place these unwarranted burdens on families and businesses in the region is unethical morally and fiscally.

Ironically, if implemented, the \$2 billion project to construct new wastewater facilities would end up being one of the last construction projects in the entire region. This result would most likely occur because the already depressed Construction Industry would be burdened with astronomical impact fee increases. A typical new "dine-in" restaurant impact fee would increase from \$14,900 to \$70,000 per 1,000 square feet. Construction of a new bar establishment would be an impact fee increase from \$5,250 to \$24,500 per 1,000 square feet. A new dry cleaner impact fee would also increase from \$12,665 to \$59,500 per \$1,000 square feet. Bottom line, the skyrocketing impact fee increases would completely eliminate construction activity in the region and discourage any business from even thinking about locating here.

The enormous cost to the region shares no nexus to uncertain improvements to the environment and public health. This permit goes far beyond what is "reasonable or necessary" as required by the Clean Water Act. Furthermore, it is not based on documented public health problems or existing environmental standards. Why is the same standards used for public beaches across the United States not good enough for the Sacramento River? The full Removal of all ammonia from wastewater effluent has not been adequately correlated with the decline of Delta fish, and is not scientifically justified to be included as a condition of this permit.

The Sacramento Regional Builders Exchange is the region's oldest and largest construction trade association, which is comprised of 2,500 local companies including: area contractors and subcontractors, suppliers, architects, engineers, and industry support organizations. The Construction Industry which we represent has been and will be vitally important to our regions employment and economic prosperity. This draft permit would decimate these companies and our industry, contributing to thousands of jobs and tax dollars lost in the region. On behalf of SRBX, I would like to express our strong opposition to the CVRWQCB's tentative draft permit recommendations. We find this permit to be lacking in scientific credibility, and to be devastating to our regions construction industry and economy.

Sincerely,

Scott Whyte
Political Director
Sacramento Regional Builders Exchange