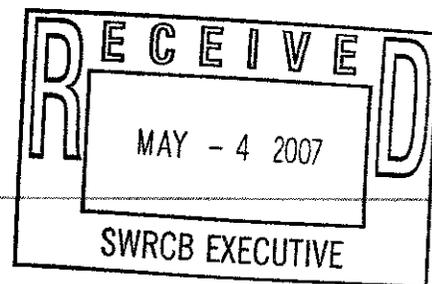


commentletters - Comment Letter - Draft Construction Permit

From: "Fred Bremerman" <FredBremerman@csdparks.com>
To: <commentletters@waterboards.ca.gov>
Date: 5/4/2007 4:09 PM
Subject: Comment Letter - Draft Construction Permit



Dear Waterboard representative -

As a representative for Cosumnes Community Services District, I'm writing to express my concern about the harsh measures proposed in the Preliminary Draft General Permit.

Our agency provides Park and Fire services. Part of our business is building park facilities and fire stations - all over one acre.

We OPPOSE the Draft Permit for the following reasons:

- 1) Economic Hardship - the Permit institutes new Action Levels which will require continuous sampling and monitoring, which creates economic hardship for our agency. Fees to build parks and fire stations are set years before the actual construction. These new requirements will add costs which cannot be passed to anyone.
- 2) No guarantee of improvement - the act of sampling does not mean waterways are less polluted. It only guarantees costs will be higher.
- 3) Everyone treated as guilty until proven innocent - The Action Levels assume everyone is polluting and needs to sample to prove innocence. It would be more appropriate to offer incentives for compliance. For example, if a firm can show no violations, they should have fewer Action Levels. If you do have violations, then it is reasonable to require more sampling.
- 4) The REAP initiative should be called the GRIM REAPER initiative. It will kill construction activity. It is not the answer.

Where is the incentive to come up with new ways to protect our waterways? Surely it is not in the Draft General Permit, which is completely punitive.

Please consider this before implementing the draconian measures proposed in the Draft General Permit.

Sincerely,

Fred J. Bremerman, Management Analyst
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