



AIA Monterey Bay

A Chapter of The American Institute of Architects

January 27, 2012

Via Electronic Mail to centralcoast@waterboards.ca.gov
Water Resources Control Engineer
Central Coast Regional Water Quality Control Board
895 Aerovista Place Suite 101
San Luis Obispo, California 93401

To the Members of the Water Board,

On behalf of the American Institute of Architects Monterey Bay Chapter (AIAMB) Board of Directors, I would like to express our great concern with the proposed Draft Permit for Salinas. We believe it will have significant negative impacts on our community.

The AIA has been encouraging good stewardship of our environment for some time now. However, the fragile condition of our local economies has made us very aware that regulation must be wisely practiced. We are in a global economy, and if we can't compete successfully, our local economy suffers. And a weak economy ultimately has a negative impact on our environment as it limits resources for any environmental improvements.

Therefore we feel that any added regulation must be very carefully weighed in light of the potential unintended consequences. In this economy, we have experienced a dramatic reduction in the willingness of the public to commit their funds to projects, many of which would improve our urban living environment. They are especially reluctant if the regulatory environment creates a greater financial burden in our central coast area than would be the case in others areas.

Several of the Draft Permit provisions seem to penalize re-development or in-fill projects. The threshold for requiring a project to mimic "pre-development conditions" seems inappropriately low. For example the replacement of 5,000 sq. ft. of turf with 5,000 sq. ft. of turf should not be deemed a trigger for any new storm water standards since both the before and after conditions still allow storm water to remain on-site. For that matter the replacement of 10,000 sq. ft. of impervious surface with 10,000 sq. ft. of any other impervious surface doesn't add runoff or change the storm drainage condition of a property at all and should not trigger any new storm drainage requirements.

The unintended consequence of these types of Draft Permit provisions will be to cause property owners to be even more reluctant to invest in improvements than they already are in this fragile economy. Many decades of combined experience in the field of architecture leads us to predict that property owner investment in maintenance and improvements will indeed be severely curtailed by any added regulatory burden.

The trend in urban planning has been to attempt to create and maintain an ever increasingly livable and sustainable environment within our urban boundaries. New regulation that threatens to cause stagnation of that urban environment seems incredibly unwise.

We urge the Water Board to revise the Draft Permit to reflect a more reasonable incremental increase in standards for development that are more consistent with those being pursued by other parts of the country. Renovation, in-fill, additions and new construction on existing developed properties that do not add impervious surface to a site, should not have added regulation in the Draft Permit.

Sincerely,

J. Michael Wadsworth
President
AIA Monterey Bay Chapter, 2012

cc.
Senator Sam Blakeslee
Mayor Dennis Donohue