PONDEROSA
HOMES

January 28, 2011

VIA E-Mail: Dale Bowyer dbowyer@waterboards.ca.gov

Bruce Wolf, Executive Director
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

RE: Comment Special Projects Proposal/LID Treatment Reduction Credits MRP Provision C.3.e.ii. (2)

Dear Mr. Wolf;

This letter is in regard to the proposed BASMAA Special Projects Proposal/LID Treatment Reduction Credits for Municipal Regional Permit (MRP) Provision C.3.e.ii(2). Ponderosa Homes appreciates the opportunity to comment on this regional effort to develop effective strategies to address water quality concern.

Ponderosa supports infill housing and development opportunities. We ask therefore that you adopt the BASMAA proposal as an important step to modify the MRP to encourage a regional emphasis on smart growth by defining and broadening the Special Projects categories that will encourage infill where otherwise regulatory barriers and site-specific constraints may limit the application of the LID treatment measures allowed by the MRP Provision C.3.

We wish to commend the seventy-six (76) BASMAA permittees and your staff for working to define the proposed Special Projects as part of the BASMAA Special Projects Proposal. It shows regional support for sustainable growth strategies throughout Bay Area by allowing flexibility in the treatment of stormwater runoff and allowing treatment reduction credits for having less accessory impervious areas and automobile-related pollutant impacts. The addition of tree-box-type filters, sand filter and mechanical vault filtration systems will balance the improved water quality benefits of building at higher densities. However, while progress has been made in technologies for stormwater capture and reuse, none of the LIP options can be counted on to be feasible for every proposed project. This is due to high costs, structural requirements, conflicts with adjacent utilities and structures, and compounded by non-infiltrative soils. Green roofs are not universally accepted, competes with solar initiatives, and presents financing and liability issues.

Main Office: 6671 Owens Drive • Pleasanton, CA 94588-3398 • Tel: (925) 460-8900 • Facsimile: (925) 734-9141

Branch Office: 77-806 Flora Road, Suite E • Palm Desert, CA 92211 • Tel: (760) 360-2109 • Facsimile: (760) 360-6546

Local jurisdictions must be allowed to develop a water credit program that applies to certain types of development projects after evaluating the feasibility of meeting LID required with the approved on-site LID best management practices. If it is not feasible to fully meet the LID and treatment control obligations though these options, then specific projects types should be able to claim water quality credits which reduce project obligations for selecting and sizing other treatment best management practices or participating in other alternative programs.

Providing flexibility by establishing a water credit program will also ensure that developments can be economically feasible and thus ultimately contribute to the local revenue stream needed to sustain municipal services and amenities.

We ask that you expand the BASMAA proposal to include volume credit reductions and encourage the construction of smart growth. Thank you for your time and consideration, we look forward to participating in this process.

Sincerely,

Pamela Hardy, Senior Manager

PONDEROSA HOMES II, INC