



January 25, 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;

Thank you for the opportunity to comment on the proposed BASMAA Special Projects Proposal/LID Treatment Reduction Credits for MRP Provision C.3.e.ii(2). We greatly appreciate the time and care with which the seventy-six (76) Bay Area Stormwater Management Agencies Association (BASMAA) permittees have worked together and with your staff to define the proposed Special Projects categories that will apply regionally to encourage infill project development where institutional barriers and site-specific constraints may limit the application of the LID treatment measures allowed by the Municipal Regional Permit (MRP) Provision C.3.

The many environmental benefits that compact, infill, and redevelopment projects can yield should be encouraged by allowing greater flexibility in the treatment of stormwater runoff. The use of tree well, sand filter, and mechanical vault filtration systems in development projects that meet local or regional sustainable growth objectives can offer a critical balance between water quality benefits and achieving other beneficial environmental objectives by creating less accessory impervious areas and auto-related pollutant impacts. Incentivizing LID treatment reduction credits should be applied to these types of Special Projects, without these important considerations the MRP will encourage low density development where bioretention, infiltration, and evapotranspiration are feasible.

I ask that you please adopt the BASMAA proposal as an important first step to modify the MRP and bring Water Board policy in line with the Federal, State, and regional emphasis on smart growth. I appreciate your time and consideration.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read "Dale J. Ruthroff".

Donald J Ruthroff, AIA
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