

From: John Bayless <jbayless@sighomes.com>
To: <kharder@waterboards.ca.gov>
Date: 10/7/2010 3:32 PM
Subject: CVRWQCB's draft permit for SRCSD's Regional Wastewater Treatment Plant.

Ms. Harder,

Signature Homes is a Sacramento area home builders and developer of master planned communities. We currently have three active new home communities in the Sacramento region, and control more than 2,000+ acres planned residential development. Due to the economic changes in our industry, we have been forced to lay off more than 75% of our staff, and have reduced salaries, and benefits to those remaining. And we are one of the few surviving privately held homebuilding operations. While we are normally a for sale builder, market conditions have dictated that we hold some of our projects as rentals, and as such currently act as landlord for approximately 600 residential units in northern California. As such, we find ourselves in a position that the costs for SRCSD to comply with your draft permit requirements could cause five fold increases to both our sewer hook up fees and our monthly sewer service charges.

In review of your draft permit requirements, it appears your proposed requirements for microfiltration and ammonia removal exceed requirements imposed elsewhere in the state. It is assumed this is due to the discharge into waters of the Delta. Since the Delta is a statewide water source and a statewide issue, funding for improvements of this type should be borne on a broader statewide level. Additionally, appropriate scientific proof of your proposed permit conditions, along with an economic cost-benefit analysis of the resulting infrastructure resulting from your permit conditions is in order prior to your finalization of this permit. As with any project, consideration of alternatives that could result in similar outcomes or results, and an analysis of the fair sharing of the costs for the resulting improvements, is in order before dictating the conditions contained in this draft permit.

Thank you for the opportunity to comment on this matter, and please include us on your contact list of parties interested in receiving notices regarding this permit.

Regards,

John D. Bayless

Division President

Signature Homes, Inc.

1322 Blue Oaks Boulevard, Suite 100

Roseville, CA 95678

Office: (916) 789-2402

Fax (916) 797-3833

Mobile (916) 275-1885

jbayless@sighomes.com