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April 3, 2009

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Bruce H. Wolfe, Executive Officer  
California Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Dear Mr. Wolfe:

**Subject: Comments on Municipal Regional Stormwater Permit  
Revised Tentative Order Dated February 11, 2009**

Thank you for the opportunity to review the subject document and specifically your proposed definition of transit oriented developments (TODs) for the purpose of providing for alternative water treatment requirements for new development and redevelopment projects (Provision C.3.e. of the subject document). Protection of our natural environment is also a key concern of MTC's Regional Transportation Plan.

As discussed with your staff in various meetings, residents of TODs statistically own fewer cars and drive less, according to the analytical work in the field, including MTC's studies of the issue, such as the *Station Area Residents Report*, ([http://www.mtc.ca.gov/planning/smart\\_growth/stars/index.htm](http://www.mtc.ca.gov/planning/smart_growth/stars/index.htm)).

The factors of TODs that appear to contribute most to lower levels of per capita and per household automobile ownership and vehicle miles of travel (VMT) are: close proximity to high quality transit, high density development, low levels of parking, and mixed land use (residential / retail / commercial). These factors also contribute to higher mode shares for transit, walking and bicycling.

We support your refinement of the definition and requirements for TODs to clarify your policies and procedures. The standards as proposed appear to define very high quality TODs for the purpose of modified water treatment requirements in a reasonable manner.

We also strongly support your requirement for the construction of 10 green streets pilot projects within the first four years of the permit (Provision C.3.b.iii. of the subject document), and strongly urge that these projects be required to be located in the region's defined "priority development areas" (PDAs) as per the Association of Bay Area Governments (ABAG) / MTC FOCUS program. We also support additional green street projects be included in the program, if possible.

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Bruce H. Wolfe, Executive Officer  
April 3, 2009

Note that a number of resources are available to assist cities and real estate developers in creating successful residential and mixed use developments with low parking ratios through shared parking, pricing, car share, transit passes and other transportation management techniques, including MTC's recent report *Reforming Parking Policies to Support Smart Growth: Toolbox/Handbook: Parking Best Practices & Strategies for Supporting Transit Oriented Development In the San Francisco Bay Area*, which can be found on line at [http://www.mtc.ca.gov/planning/smart\\_growth/parking\\_seminar/Toolbox-Handbook.pdf](http://www.mtc.ca.gov/planning/smart_growth/parking_seminar/Toolbox-Handbook.pdf) The work is discussed at [http://www.mtc.ca.gov/planning/smart\\_growth/parking\\_study.htm](http://www.mtc.ca.gov/planning/smart_growth/parking_study.htm)

We look forward to continuing to work to protect our environment with the California Regional Water Quality Control Board.

Sincerely,



Doug Kimsey  
Director, Planning

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