



Tri-County

Quality Housing • Ethics • Professionalism  
Serving Santa Clara, San Mateo, and  
Santa Cruz counties

**The CAA Network**

- California Apartment Association
- Apartment Association of Greater Inland Empire
- CAA Central Valley
- CAA Contra Costa
- CAA Greater Fresno
- CAA Los Angeles
- CAA Napa/Solano
- CAA Tri-County
- Income Property Association of Kern
- Marin Income Property Association
- North Coast Rental Housing Association
- Rental Housing Association of Northern Alameda County
- Rental Housing Association of Sacramento Valley
- Rental Housing Owners Association of Southern Alameda County
- San Diego County Apartment Association
- San Francisco Apartment Association
- San Joaquin County Rental Property Association
- South Coast Apartment Association

June 10, 2011

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

RE: Comment Feasibility Criteria Report Municipal Regional Permit (MRP) Provisions

Dear Mr. Wolf;

The California Apartment Association, Tri-County Division (CAA Tri-County) which represents over 3,000 owners, managers, and developers of residential rental property in Santa Clara, San Mateo, and Santa Cruz counties appreciates the California Regional Water Quality Control Board’s (RWQCB) efforts to ensure that cities in the San Francisco Bay Area have the proper tools to meet their water quality improvement goals.

CAA Tri-County supports the recommendations outlined in the Bay Area Stormwater Management Agencies Association’s (BASMAA) Feasibility Criteria Report submitted to the RWQCB on April 29, 2011. Allowing more flexibility within the Limited Impact Development (LID) regulations, which the Feasibility Criteria Report puts forth, would give cities, developers, and property managers more options to deal with urban water runoff when it is not feasible to harvest water as LID stipulates.

When the LID regulations were proposed the state of the economy was healthier. Applying these regulations will weaken and slow growth in the construction and housing market, only adding to the Bay Area’s strained economy and housing supply. Though CAA Tri-County encourages sustainable growth strategies across the region, we must balance economic and environmental factors. Asking property owners to provide on-site facilities to mitigate urban water runoff is not practical at this time. Without the provisions provided in the Feasibility Criteria Report, CAA Tri-County believes our local economy will be placed at greater risk due to the increased cost of the necessary infrastructure needed to harvest urban water runoff.

For these reasons, the CAA Tri-County Division supports the submission of the Feasibility Criteria Report and encourages the RWQCB to accept the additional provisions outlined in the report.

Thank you for your time and consideration,

Sincerely,

Brad Speers  
CAA Tri-County Division  
Public Affairs Manager