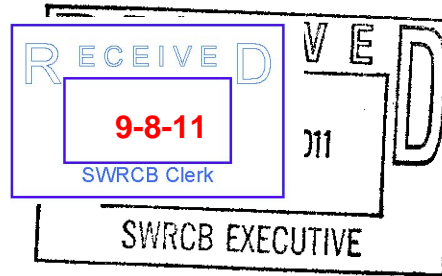




September 7, 2011

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Regarding: Draft General NPDES Permit for Small MS4s (Phase II Permit):

Dear Ms. Townsend and Members of the Board:

On behalf of Signature Homes the following comment on the Draft General NPDES Permit for Small MS4s is offered:

128.1



The draft permit currently defines the cutoff point for imposition of hydromodification requirements on new projects as being any project that has obtained small lot tentative map approval prior to the enactment of the General NPDES Permit by the local municipality.

Master planned communities primarily use a specific plan as the primary planning document (instead of a small lot tentative map), in which case all the master utility and hydrology planning is performed at the specific plan level, downstream infrastructure improvements are constructed, and then the master planned community is sequentially small lot tentative mapped on a phase by phase basis as the community builds out.

We urge the Board to consider revising the cutoff point for imposition of hydromodification requirements to be based on specific plan approval, rather than small lot tentative map approval, to account for the process that master plan communities utilize.

Thank you for your consideration of our concerns. If you should need any additional information, please call me at (916) 789-2421.

Sincerely,

SIGNATURE HOMES, INC.

Stephen M. Hicks
Director of Forward Planning