

September 19, 2011

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Via: Commentletters@waterboards.ca.gov

Re: Caltrans MS4 NPDES Permit - OPPOSE

Dear State Water Board Members and Staff:

Orange County Business Council represents the largest, most diverse companies dedicated to doing business in Southern California. We advance Orange County's economic prosperity while protecting a high quality of life. Respectfully, we must oppose the State Water Board's proposed Caltrans MS4 NPDES Permit.

This permit, as drafted, would impose extensive new regulations on all future Caltrans road construction projects that far surpass what the federal government requires from states under the federal Clean Water Act.

If implemented, Caltrans estimates that the draft permit would drain an estimated \$600 million annually from state road construction projects each year. In addition, the new permit requirements would delay projects and increase cost, devastate an already crippled construction industry, and divert taxpayer dollars without demonstrating a proportionate benefit to the public or the environment.

The Governor and legislative leaders have called for increased economic analysis of state regulations to better balance taxpayer costs and benefits. By not examining other most cost effective permits already in use around the country, the State Water Board would be implementing the most expensive stormwater permit in the nation without any analysis of less expensive alternatives.

As the region and the state continue to experience an unprecedented economic contraction affecting both the private and public sectors, the new long-term economic reality must be acknowledged, which demands for public resources to be used as efficiently as possible. The Orange County Business Council believes that the protection of our waters can be accomplished, even in these challenging times, as long as the required investments of the regulated community are warranted by the progress to be achieved.

For these reasons, we oppose the proposed Caltrans MS4 NPDES permit and request that the State Water Board work with Caltrans to develop a more cost-effective permit that improves water quality without defunding our transportation system.

The Orange County Business Council remains committed to investing in water quality as a top priority in the County of Orange and we appreciate your willingness to consider our comments.

Sincerely,



Kate Klimow
Vice President of Government Relations