



Alameda County  
Transportation  
Commission

Contra Costa County  
Transportation Authority

Fresno County  
Transportation Authority

Imperial County  
Transportation  
Commission

Los Angeles County  
Metropolitan  
Transportation  
Authority

Madera County  
Transportation Authority

Marin County  
Transportation Authority

Orange County  
Transportation Authority

Riverside County  
Transportation  
Commission

Sacramento County  
Transportation Authority

Sonoma County  
Transportation Authority

San Bernardino  
Associated Governments

San Diego County  
Association of  
Governments

San Francisco County  
Transportation Authority

San Joaquin County  
Council of Governments

San Mateo County  
Transportation Authority

Santa Barbara County  
Association of  
Governments

Santa Clara Valley  
Transportation  
Authority

Tulare County  
Association of  
Governments

September 15th, 2011

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Re: Caltrans MS4 NPDES Permit

Dear State Water Board Members and Staff:

The Self Help Counties Coalition (SHCC) member agencies routinely partner with the California Department of Transportation to fund California's transportation infrastructure. There are 19 self-help counties in California, representing 81 percent of the population or roughly 30 million people. The SHCC member agencies generate, on average, \$4 billion each and every year for transportation projects creating tens of thousands of jobs for California.

We are writing to express our concern with the State Water Board's proposed Caltrans MS4 NPDES Permit. The permit, as drafted, would impose extensive new regulations on all future Caltrans projects, including some projects sponsored by our member agencies.

SHCC member agencies support clean water policies and have dedicated our own resources to ensure that the best management practices are followed to ensure our projects protect the waters of California.

If implemented, the draft permit could drain hundreds of millions of dollars annually from state funded road construction projects each year. In order for our member agencies to deliver the transportation infrastructure we have promised the taxpayers in our Counties, we rely upon our State and Federal partners to continue to contribute their share of funding for project delivery. Such enormous new costs to the Caltrans budget could result in delayed projects, added costs and the elimination of thousands of jobs.

Caltrans' mandate is to build, maintain and improve California's highways; the proposed permit would require Caltrans' to abandon this mandate and spend limited resources retrofitting existing infrastructure to meet the permit's requirements.

While we support efforts to improve water quality, there is no evidence that these proposed regulations would proportionally improve water quality to justify spending hundreds of millions of taxpayer dollars each year.

We would ask you to delay the adoption of the proposed Caltrans MS4 NPDES permit and request that you continue to work with Caltrans to develop a more cost-effective permit that improves water quality without defunding our transportation system and derailing our economy. In addition to this letter, the SHCC supports and incorporates by reference the comments submitted by California Alliance for Jobs.

Sincerely,

A handwritten signature in black ink that reads 'Keith N. Dunn'.

Keith N. Dunn  
Executive Director  
Self Help Counties Coalition  
(916) 290-2900