



September 19, 2011

**Construction  
Industry  
Coalition  
On Water Quality**

*Coalition Members*

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814  
[Commentletters@waterboards.ca.gov](mailto:Commentletters@waterboards.ca.gov)

**Re: Opposition to Caltrans MS4 NPDES Permit**

Dear State Water Board Members and Staff:

On behalf of the Construction Industry Coalition on Water Quality (CICWQ) I am writing to express our opposition to the State Water Board's proposed Caltrans MS4 NPDES Permit. As proposed, this permit would impose extensive new regulations on all future Caltrans road construction projects that far surpass federal requirements for states under the federal Clean Water Act.

Caltrans estimates that the draft permit would require an estimated \$600 million annually from state road construction projects each year. CICWQ is concerned that these significant costs would come at a time of limited resources and result in the elimination of thousands of jobs in the construction industry at a time when our economy and especially the construction can hardly afford further job losses.

The proposed permit would significantly shift Caltrans' focus from improving roadways to retrofitting existing infrastructure to meet the permit's requirements. This would worsen road conditions, create unsafe driving environments, and force California motorists to pay more for driving on under-maintained roadways.

While we support efforts to improve water quality, there is no evidence that these proposed regulations would proportionally improve water quality to justify spending \$600 million taxpayer dollars each year.

For these reasons, CICWQ opposes the proposed Caltrans MS4 NPDES permit and requests that the State Water Board work with Caltrans to come up with a more cost-effective approach that improves water quality without the unnecessary impacts to California's transportation system that will result from the proposed permit.

Sincerely,

A handwritten signature in black ink that reads "Michael W. Lewis".

Michael W. Lewis,  
Senior Vice-President

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Major Funding Provided by the Construction Industry Advancement Fund and the Fund for Construction Industry Advancement



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