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September 19th, 2011

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 the proposed Caltrans MS4 NPDES Permit

Dear State Water Board Members and Staff:

ZS-1 → The San Diego Regional Chamber of Commerce opposes the State Water Resources Control Board's proposed Caltrans MS4 NPDES Permit in its current form. We strongly believe the draft permit would impose burdensome, expensive, unnecessary new regulations on all future Caltrans road construction projects.

Caltrans estimates that the draft permit would add an estimated \$600 million to state road construction projects annually. The permit goes well beyond the federal requirements under the federal Clean Water Act and the enormous costs would eliminate thousands of construction jobs at a time when our economy can hardly afford to lose more jobs. It would force Caltrans to concentrate on capturing and diverting storm water rather than improving or expanding roadways. This permit would expose motorists to unnecessary hazards and increase congestion on California roadways.

The Chamber supports efforts to improve water quality; however, the cost of implementing the permit is so large it is difficult to justify spending \$600 million taxpayer dollars each year. Plus, there is no evidence to suggest that the cost of these proposed regulations would improve water quality.

The Chamber requests that the State Water Board oppose the proposed Caltrans MS4 NPDES permit and collaborate with Caltrans to find a more cost-effective permit that improves water quality without adversely impacting the state's highway system.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Webster'.

Paul Webster  
Vice-President of Public Policy