



Alameda County
Transportation
Commission

Contra Costa County
Transportation Authority

Fresno County
Transportation Authority

September 15th, 2011

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

Imperial County
Transportation
Commission

Re: Caltrans MS4 NPDES Permit

Dear State Water Board Members and Staff:

Los Angeles County
Metropolitan
Transportation
Authority

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.

Madera County
Transportation Authority

Marin County
Transportation Authority

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.

Orange County
Transportation Authority

Riverside County
Transportation
Commission

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.

Sacramento County
Transportation Authority

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.

Sonoma County
Transportation Authority

San Bernardino
Associated Governments

San Diego County
Association of
Governments

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.

San Francisco County
Transportation Authority

San Joaquin County
Council of Governments

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.

San Mateo County
Transportation Authority

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.

Santa Barbara County
Association of
Governments

Santa Clara Valley
Transportation
Authority

Sincerely,

Tulare County
Association of
Governments

Keith N. Dunn
Executive Director
Self Help Counties Coalition
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