



September 16, 2011

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

**SUBJECT: Caltrans MS4 NPDES Permit**

Dear State Water Board Members and Staff:

On behalf of Valley Industry and Commerce Association (VICA), we strongly oppose the State Water Board's Caltrans MS4 NPDES Permit proposal. As drafted, this permit will impose extensive new regulations on new Caltrans road construction projects that far surpass federal requirements under the Clean Water Act.

If implemented, Caltrans estimates that the permit will drain an estimated \$600 million from state road construction projects annually. Such enormous costs will result in the loss of thousands of construction jobs, deepening the industry's 85 percent unemployment rate.

Furthermore, the proposed permit will significantly shift Caltrans' focus from improving roadways to retrofitting existing infrastructure to meet the permit's requirements. These retrofitting projects will worsen road conditions, create unsafe driving environments, and increase the state's mounting debt by more than \$600 million dollars each year.

While VICA supports efforts to improve water quality, there is no evidence that these proposed regulations would proportionally better our resources.

We request that Board remove the proposed Caltrans MS4 NPDES permit from consideration and work with Caltrans to come up with a more cost-effective permit that improves water quality without defunding our transportation system.

Sincerely,

Daymond Rice  
2011 Chair

Stuart Waldman  
President