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Mark Breslin

September 15, 2011

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



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

Dear State Water Board members and staff:

On behalf of the Engineering & Utility Contractors Association (EUCA), I am writing to express our strong **opposition** to the State Water Board's proposed Caltrans MS4 NPDES Permit. This permit, as drafted, would impose extensive new regulations on all future Caltrans road construction projects that far surpass what the federal government requires from states under the Federal Clean Water Act.

EUCA represents more than 450 contractors and associated firms throughout the Western United States. EUCA contractors are responsible for building and maintaining some of California's most vital infrastructure including our roads, highways, bridges, schools and hospitals. EUCA supports clean water efforts for our state. We also believe in the *reasonable* implementation of environmental regulations that balance the value of our natural resources with the value of a strong economy and job opportunities for California's citizens.

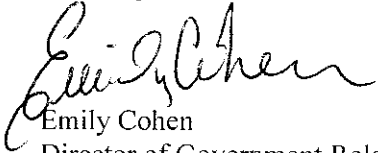
Caltrans estimates that the draft permit would drain an estimated \$600 million annually from state road construction projects. Such enormous costs would result in the elimination of thousands of jobs in the construction industry at a time when our economy cannot afford further job losses.

If implemented, the proposed permit would force Caltrans to significantly shift 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.

Additionally, while EUCA supports 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. This is of great concern to us.

For all of these reasons, EUCA opposes the proposed Caltrans MS4 NPDES permit and requests that the State Water Board and staff work with Caltrans to come up with a more cost-effective permit that improves water quality *without* defunding our transportation system.

Sincerely,



Emily Cohen  
Director of Government Relations  
Engineering and Utility Contractors Association