



September 19, 2011

Jeanie 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:

As a business owners of this state, We are writing to express strong opposition to the State Water Board's proposed Caltrans MS4 NPDES Permit. This permit would impose extensive new regulations on future Cal-Trans projects that far surpasses requirements as set forth by the federal Clean Water Act, and would be an huge drain on the vital state road construction budget.

If the potential \$600 million dollar drain to the state road construction and maintenance budget is added to the cost of vehicle damage cause by poorly maintained roads which would result from the approval of this permit and additionally added to the thousands of jobs which this permit would cost (and the tax dollars lost with the loss of these jobs), it is clear that this permit could easily cost the state and taxpayers in excess of a billion dollars. At what gain?

The fact is that even though the Governor and the Legislative leaders have recently called for increased economic study of state regulations to better asses cost versus benefit ratio of these regulations, the State Water Board has conducted no analysis and no study of the potential public benefit of the approval of this permit.

While it is certainly reasonable to work towards improvements in water quality, to do so at such a huge cost with no assessment of potential return to cost analysis is very **unreasonable**. I feel that a 600 million dollar investment that could cost the state and taxpayers over a billion dollars in the long run should be required to demonstrate a high level of return to investment before approval..

Make no mistake. These are economic hard times we are living through right now. Tax dollars need to be stretched and not reduced by investments by overhead costs with debatable or unproven rewards. Please oppose Caltrans MS4 NPDES permit and keep the Cal-Trans financial focus on the improvement of the highway infrastructure and repair to our tattered roadways that are so desperately needed.

Sincerely Yours,  
The Associated Members of the Humboldt Builder's Exchange