9/21/11 Bd. Workshop Caltrans MS4 Permit Deadline: 9/19/11 by 12:00 noon



City of Rocklin

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September 19, 2011

Ms. Jeanine Townsend Clerk to the Board State Water Resources Control Board 1001 | Street, 24th Floor Sacramento, CA 95814 Commentletters@waterboards.ca.gov

Re: Opposition to Caltrans MS4 NPDES Permit

Dear State Water Board Members and Staff:

On behalf of the City of Rocklin, I am writing to express the City's 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.

If implemented, Caltrans estimates that the draft permit would drain an estimated \$600 million annually from state road construction projects each year. Such enormous costs would result in the elimination of thousands of jobs in the construction industry at a time when our economy can hardly afford further job losses.

The City is concerned that the proposed permit would significantly shift Caltrans' 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.

While the City 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.

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

Sincerely,

Ricky A. Horst City Manager

cc: Rocklin City Council

Russell A. Hildebrand, City Attorney Rick Forstall, Director of Public Services