



September 16, 2011

Mr. Charles Hoppin, Chairman
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Commentletters@waterboards.ca.gov

Re: Opposition to Caltrans MS4 NPDES Permit

Dear Chairman Hoppin:

The California Chamber of Commerce (CalChamber) is the largest broad-based business advocate to government in California. Our membership represents one-quarter of the private sector jobs in California and includes firms of all sizes and companies from every industry within the state. Three-fourths of the CalChamber members are companies with 100 or fewer employees.

The CalChamber has already submitted comments on the overall MS4 NPDES permit. These comments are directed to the Caltrans portion of the permit. The CalChamber supports and incorporates by reference comments submitted by the California Alliance for Jobs.

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.

We are 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. The business community relies on roadways to move goods and services on a daily basis but also as a means for our employees to get to and from work. Less road improvements and maintenance means longer trips which translate into lost productivity and fewer dollars circulating in the economy.

While we support 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 and causing the business community to struggle even more to deliver necessary goods and services at an affordable price.

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For these reasons, the CalChamber 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,



Valerie Nera,
Policy Advocate

cc: Tam Doduc, Member of the Board
Fran Spivey-Weber, Member of the Board

VN:jh