COUNTY OF RIVERSIDE
TRANSPORTATION AND LAND MANAGEMENT AGENCY

Transportation Department

Juan C. Perez, P.E., T.E.
Director of Transportation

September 20, 2011

Jeanine Townsend
Clerk to the Board
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 State Water Board Members and Staff:

On behalf of the Riverside County Transportation Department (RCTD), I am writing to express our 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.

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.

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.

For these reasons, RCTD 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,

Juan C. Perez
Director of Transportation

CC: Patty Romo, Deputy Director
        Claudia Steiding, Senior Transportation Planner