

From: <rickgove@pavementrecycling.com>
To: <commentletters@waterboards.ca.gov>
Date: 9/19/2011 3:20 PM
Subject: Oppose Caltrans MS4 NPDES Permit

Richard Gove
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September 19, 2011

Jeanine Townsend
Clerk to the Board
CA

Dear Jeanine Townsend:

I am writing to express my 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 are outside the limits of common sense.

We all agree clean water is important. But blanket "method" regulations like the Caltrans MS4 NPDES Permit process impose far more costs than benefits. Current regulations, properly implemented should be more than enough for the vast majority of construction projects. Certainly at the planning stage, if a particular danger of contamination from construction is identified more stringent conditions can be built into the project. But why make every project pay for what is a relatively low number of "risk" projects? It is time for California to be competitive again and this regulation will add to California's malaise and coupled with other regulatory issues still in play, could be the parasite that kills the patient.

Caltrans estimates that the draft permit would drain an estimated \$600 million annually from state road construction projects. Why not use that money to make us more competitive by improving our infrastructure rather than adding a crippling regulation?

Has a cost - benefit analysis of this regulation been completed and if so by whom? Has the cost-benefit analysis been the subject of peer review and public comment? If not, your job is not complete, yet you want to take \$600MM of taxpayer money.

For all of these reasons, I oppose the proposed Caltrans MS4 NPDES permit and request 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,

Richard Gove
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