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STATE OF CALIFORNIA

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# LATE COMMENT

Public Comment  
Statewide Dredged or Fill Procedures  
Deadline: 8/18/16 by 12:00 Noon

SENATOR JIM BEALL, Ex Officio  
ASSEMBLY MEMBER JIM FRAZIER, Ex Officio  
SUSAN BRANSEN, Executive Director



## CALIFORNIA TRANSPORTATION COMMISSION

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August 18, 2016

Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000

Re: Comment Letter – Statewide Dredged or Fill Procedures

Dear Ms. Townsend:

The California Transportation Commission (Commission) is in receipt of and has reviewed and considered the State Water Resources Control Board's (SWRCB) proposed Procedures for Discharges of Dredged or Fill Materials to Waters of the State at its August 2016 Commission meeting. Recognizing the importance of addressing California's mobility needs while protecting California's environment, and at the same time, the competing demands for declining transportation revenue, the Commission is concerned with the degree to which the California Department of Transportation (Department) and other transportation stakeholders can comply with the proposed procedures.

As you are aware, even with the current funding shortfalls, a significant amount of transportation funding is already directed toward those measures necessary to comply with existing laws and regulations, including existing requirements to protect California's environment. For example, the federal Clean Water Act, the state Porter-Cologne Water Quality Control Act and other policies and guidance are regulated by the U.S. Army Corps of Engineers, the U.S. Environmental Protection Agency, the California Department of Fish and Wildlife, the California Coastal Commission, and other agencies. To ensure that the proposed procedures promote streamlined processes that reduce regulatory redundancy and costs, it is critical that the SWRCB

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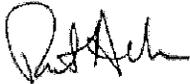
consult with these agencies to evaluate the necessity of expanding the wetland definition and permitting process beyond existing requirements.

Given the potential magnitude of this new program, it is not enough to rely on a qualitative assessment of potential costs or consequences associated with the proposal. Therefore, the Commission recommends the SWRCB quantitatively estimate the potential costs of these proposed procedures and carefully weigh the estimated costs against the expected benefits before taking any formal action. To facilitate this effort, the Commission encourages the SWRCB to work closely with the Department and other stakeholders to develop a full analysis of the potential cost implications of these proposed procedures.

Finally, the Commission encourages the SWRCB to consider and address all comments received. Without careful consideration, a proposal of this magnitude could delay important transportation infrastructure, increase costs for an overburdened transportation financing system, and significantly impact the state's economy.

If you have any questions, please do not hesitate to contact Susan Bransen, Commission Executive Director, at (916) 654-4245.

Sincerely,



BOB ALVARADO

Chair