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July 2, 2009

Ms. Catherine Kuhlman
Executive Officer
California North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

**Re: Proposed Renewal of Waste Discharge Requirements, NPDES No.
CA0025054 for the City of Santa Rosa, the County of Sonoma, and the
Sonoma County Water Agency**

Dear Ms. Kuhlman:

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the proposed renewal of waste discharge requirements (WDR) for the City of Santa Rosa, the County of Sonoma, and the Sonoma County Water Agency. The proposed permit applies to dry and wet weather discharges from the municipal separate storm sewer systems (MS4) discharging to Russian River, its tributaries and other waters.

Finding 24 notes that, "Federal and state entities within the Co-Permittees' boundaries and not currently named in this order, may operate storm drain facilities and/or discharge stormwater to storm drains and watercourses covered by this order." As such this order does not pertain to Caltrans as the State Water Board has adopted a separate statewide NPDES permit for its stormwater discharges.

On October 22, 2008, Caltrans submitted comments to the draft order released by the North Coast Regional Water Quality Control Board (NCRWQCB) on September 9, 2008, and requested clarifications on certain matters. In addition to the comments submitted earlier, Caltrans has concerns about the draft order released on May 22, 2009. The additional concerns are as follows:

The permit, page 36, states as follows:

"6. New Development and Redevelopment Projects

a) New Development and redevelopment projects that are required to implement post-construction treatment controls to mitigate all project related stormwater pollution include:

- (8) Streets, roads, highways and freeway construction of 10,000 square feet and more of impervious surface."

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The terms highways and freeways are most commonly used in Caltrans projects. The order should clarify that discharges from the Caltrans highways, freeways and construction projects on those system discharging solely to the Caltrans MS4 are covered under statewide NPDES MS4 permit.

Caltrans requests that all the references to the Caltrans Stormwater Quality Handbooks, Construction Site Best Management Practices (BMPs) Manual and Maintenance Staff Guide be removed and replaced with more generic references. This is necessary to avoid Caltrans' handbooks becoming "standard practice" which will limit Caltrans' ability to update or modify practices. Page 47, Table 8 (BMP at Construction Sites Less than 1 Acre) refers to the California BMP Handbook, Construction, January 2003 and the Caltrans Stormwater Quality Handbooks, Construction Site Best Management Practices (BMPs) Manual, March 2003, and addenda. Table 10 (BMPs at Vehicle Maintenance/Materials Storage Facilities/Corporation Yards) refers to the Caltrans Stormwater Quality Handbook Maintenance Staff Guide (May 2003 including future updates and revisions).

We hope our concerns will be addressed before the final order is duly adopted by the NCRWQCB. If you have any questions, please call Joyce Brenner of my staff at (916) 653-2512.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Scott McGowen', with a stylized flourish at the end.

G. SCOTT McGOWEN
Chief Environmental Engineer
Division of Environmental Analysis

c: Scott McGowen, Principal Engineer - Stormwater
Joyce Brenner, Office Chief, Program Implementation
Jaggiwan Grewal, HQ Liaison NCRWQCB