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March 28, 2014

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

Subject: Proposed Amendment to Caltrans MS4 Permit

Dear Ms. Townsend:

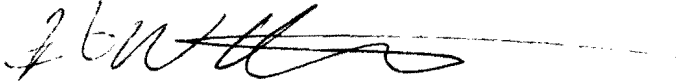
This letter presents comments from the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) on the proposed amendments to the California Department of Transportation Municipal Separate Storm Sewer System (MS4) permit that would incorporate implementation requirements for reducing pollutants of concern in stormwater discharges. SCVURPPP is an association of 13 cities and towns, the Santa Clara Valley Water District, and the unincorporated Santa Clara County that are subject to requirements in the regional municipal stormwater NPDES permit for the San Francisco Bay Area region. SCVURPPP and its member agencies appreciate the opportunity to comment and support the adoption of the proposed amendment to the Caltrans permit with the modifications described below.

SCVURPPP is supportive of the proposed amendment because it is generally consistent with the MS4 permit requirements already in place in the Bay Area, including those associated with mercury reduction and trash controls. To further clarify consistencies among the two permits, we recommend that trash, mercury and other pollutants of concern in the Bay Area be categorized as high priority by Caltrans and the State Board, consistent with priorities established via the Bay Area regional MS4 permit. To facilitate this prioritization, we also request that language be added to Attachment IV of the proposed amendment to more clearly state that Bay Area water bodies impacted by trash will be included in the prioritization process.¹ Confirmation of the consistencies between the Bay Area MS4 and proposed amendments to the Caltrans permit would greatly facilitate cooperation between SCVURPPP Permittees and Caltrans in the form of cooperative implementation efforts, as described in Section II.B Cooperative Implementation of the proposed amendment.

SCVURPPP and Santa Clara Valley Permittees look forward to further collaborations with Caltrans on implementing high priority pollutant control programs and cost-effective control measures to meet water quality goals. Please contact me if you have any questions or would like to discuss our comments further.

¹ The language in the proposed amendments to the Caltrans permit that defines which waterbody-pollutant combinations will be considered as part of the prioritization process appears to only include water bodies with adopted and approved TMDLs. Although the San Francisco Bay Water Board has identified trash reduction as a high priority issue in the Bay Area and in response to this determination has included requirements in the Bay Area MS4 permit to significantly reduce trash discharged from stormwater, prioritization of this pollutant was not based on an approved TMDL.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Olivieri', with a long horizontal flourish extending to the right.

Adam W. Olivieri Dr. PH, P.E.
Program Manager

cc: Bruce Wolfe, San Francisco Bay Regional Water Quality Control Board
Tom Mumley, San Francisco Bay Regional Water Quality Control Board
Scott McGowen, California Department of Transportation
SCVURPPP Management Committee