



Environmental Services Department

WATERSHED PROTECTION



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:

Thank you for this opportunity to comment and support the adoption of the proposed amendment 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. The City of San José 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.

We're eager to collaborate with Caltrans on future stormwater implementation efforts and recommend that trash, mercury and other pollutants of concern in the Bay Area be categorized as high priority by Caltrans and the State Board. Identifying these pollutants-waterbody combinations as high priority would provide consistency with priorities established via the Bay Area regional MS4 permit and greatly facilitate cooperation between the City of San José and Caltrans in the form of cooperative implementation efforts, as described in Section II.B Cooperative Implementation of the proposed amendment.

To ensure that water quality concerns in Santa Clara Valley water bodies associated with Caltrans right-of-ways receive an adequate level of attention, we look forward to providing further input on the waterbody-pollutant prioritization process outlined in the proposed amendment. Additionally, we look forward to enhanced collaborations with Caltrans on implementing high priority pollutant control programs and cost-effective control measures to meet water quality goals in the City of San José.

Please contact me if you have any questions or would like to discuss our comments further.

Sincerely,

Napp Fukuda
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Environmental Services Department
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cc: SCVURPPP Management Committee