



PUBLIC WORKS

CITY OF  
**PALO  
ALTO**

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March 27, 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 (Caltrans) Municipal Separate Storm Sewer System (MS4) permit that would incorporate implementation requirements for reducing pollutants of concern in storm water discharges. The City of Palo Alto 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 are eager to collaborate with Caltrans on future storm water 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-water body 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 Palo Alto 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 rights-of-way receive an adequate level of attention, we look forward to providing further input on the water body-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 Palo Alto, with respect to trash, focusing particularly on areas along El Camino Real (State Route 82) and Highway 101.

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

Sincerely,

Mike Sartor  
Director of Public Works  
City of Palo Alto

cc: SCVURPPP Management Committee



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