



October 25, 2018

*Via e-mail and U.S. mail to:*

Jeanine Townsend  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

**Re: Comments on Caltrans TMDL Progress Report.**

Ms. Townsend:

The Natural Resources Defense Council (NRDC) thanks you for this opportunity to comment on the Caltrans TMDL Progress Report. I have reviewed the progress report and have one comment on an issue that appears throughout the document. There are multiple pollutants for which Caltrans is not in compliance, in waterbodies throughout the state. In these instances, current control measures are not meeting waste load allocations (WLAs); however Caltrans states that continued use of these same control measures will eventually meet waste load allocations by the required deadlines. Caltrans does not properly support their assertion that "...these activities will be sufficient to meet waste load allocations," and is not specific about how control measures that are currently insufficient to meet WLAs will be sufficient in the future. Caltrans must provide support for this assertion in areas where the agency is not currently in compliance.

Thank you again for this opportunity to comment.

Regards,  
Corinne Bell

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