



## California Stormwater Quality Association®

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December 22, 2017

Felicia Marcus, Chair  
State Water Resources Control Board

Subject: Request for Postponement of Public Hearing and Extension of Comment Period for  
Proposed Amendment to the Statewide Industrial General Stormwater Permit Incorporating  
Total Maximum Daily Load (TMDL) Requirements

Dear Ms. Marcus:

The California Stormwater Quality Association (CASQA) is writing with a request regarding the Proposed Amendment to the Statewide Industrial General Stormwater Permit (Proposed Amendment). The Proposed Amendment would incorporate Total Maximum Daily Load (TMDL) Requirements into the Industrial General Stormwater Permit (IGP). The current schedule is as follows:

December 15, 2017 – Proposed Amendment and related documents released  
December 18, 20, & 21, 2017 – Staff Workshops held  
January 9, 2018 – Public Hearing conducted  
January 31, 2018 – Comment Period ends

### **Time to develop comments is limited significantly**

We understand the intent of this schedule was to provide a 45-day comment period, which would be more generous than the typical 30-day period – an intent with which we agree and appreciate. Unfortunately, this time of year is difficult to coordinate schedules. With the Holidays, including Hanukkah, Christmas, New Years, and Martin Luther King Day, occurring between the December 15 release and the January 31 end of comment period; conservatively – reviewers have about 30 business days to review all the Proposed Amendment information, develop and vet several rounds of draft comments, confer with Water Board staff and fellow commenters, and finalize and submit their comments. If commenters take any days off, as many do this time of year, in particular the four business days between Christmas and New Year's Day and / or take time to travel to and participate in one of the Staff Workshops, the Public Hearing, or both, the number of days to develop comments could easily and realistically be down to less than half of the intended 45 days.

### **Scope of review is substantial**

Just seven days ago, a substantial amount of material was released for review and comment. The release included an Order, Fact Sheet, and multiple Attachments and Appendices. Additionally, information presented and discussed at the series of three Staff Workshops that just concluded today indicates that our review has an additional layer of complexity associated with review of the actual language of the TMDLs, and associated bases for translations used to bring those requirements into the IGP.

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The combination of a substantial and complex amount of material to review and significantly limited time in which to do it convinces CASQA that additional time is necessary to allow CASQA and the many industrial permittees and other stakeholders time to both fully understand and discuss issues raised by the Proposed Amendment, and to draft and submit comprehensive, well-formed, and useful comments. Therefore, we request the following: 1) postpone the Public Hearing and 2) extend the Comment Period as follows:

January 23, 2018 – Public Hearing conducted  
March 2, 2018 – Comment Period ends

CASQA appreciates the Board's consideration of this request. If you have any questions, please contact me directly at (650) 365-8620.

Sincerely,



Geoff Brosseau, Executive Director  
California Stormwater Quality Association

cc: Eileen Sobeck, State Water Board Executive Director  
Jonathan Bishop, State Water Board Chief Deputy Director  
Laurel Warddrip, State Water Board Industrial / Construction Stormwater Unit  
Matthew Lentz, CASQA Industrial Subcommittee Co-Chair  
Jeremy Laurin, CASQA Industrial Subcommittee Co-Chair  
CASQA Board of Directors and Executive Program Committee