

# WATER

Workable Approach to Environmental Regulation

December 26, 2017

Board Chair Felicia Marcus  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

**RE: Request for 30-day Extension of Comment Period for Proposed Amendment to the Statewide Industrial General Storm Water Permit—Total Maximum Daily Load (TMDL)**

Dear Chair Marcus:

**WATER** is a coalition of businesses, schools, cities and local governments that supports cost-effective water quality policies. Collectively we represent 50 trade associations with over 20,000 businesses that employ 1.5 million workers, dozens of cities, and nearly 500 school districts that encompass 92% of California's school children.

The Notice of Opportunity for public comment, public hearing and staff workshops was posted on December 1, 2017<sup>1</sup>. A 45-day comment period (December 15-January 31) has been provided. WATER acknowledges the current comment period, but must convey that there are multiple deadlines and schedule conflicts during this time period. December is a major month for completing Level 1 and Level 2 reports. Businesses, and consultants, are working hard to meet the deadlines within the permit. The comment period you have chosen is also the busiest holiday schedule of the year.

As a result, **WATER formally requests that the written comment deadline be extended from Wednesday, January 31, at noon to Friday, March 2, at noon.** A change to the public hearing date (currently January 9<sup>th</sup>) would also likely be warranted as well. The proposed TMDLs are complicated with many variables and warrant additional review. An extension will better serve all of us in the current rulemaking process.

Thank you for hearing our concerns, and please let us know if there is anything further we can provide on this matter.

Sincerely,

  
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Shuka Rastegarpour ([shuka.rastegarpour@waterboards.ca.gov](mailto:shuka.rastegarpour@waterboards.ca.gov))

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<sup>1</sup> [https://www.waterboards.ca.gov/water\\_issues/programs/stormwater/tmdl\\_igp.shtml](https://www.waterboards.ca.gov/water_issues/programs/stormwater/tmdl_igp.shtml)