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August 18, 2017

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



Proposed Amendments to the Phase II Small MS4 General Permit for Storm Water Discharges

Dear Ms. Marcus:

In June 2017, the State Water Resources Control Board released the draft amendment to the Phase II Small MS4 General Permit which proposes new specific permit requirements associated with Total Maximum Daily Loads (TMDLs) and requested comments by July 20, 2017. In a letter dated July 19, 2017, the California State University (CSU) requested an extension to October 20, 2017 to provide time to fully understand the implications of the proposed amendment and to provide meaningful input to the State Water Resources Control Board for its consideration. The comment period was subsequently extended to August 21, 2017.

It is appreciated that staff from the State Water Resources Control Board and several Regional Boards met with the CSU Chancellor's Office and CSU campuses on August 7, 2017 to discuss the proposed permit requirements. The meeting assisted in providing an improved understanding of the proposed requirements and involved some discussion intended to provide clarification on the amendment. Topics discussed included expectations for sampling/testing and implementation plans, as well as the relationship between waste load allocations and implementation plans. However, in order to successfully develop and ultimately implement actions to TMDL requirements, it is necessary to fully understand the implications of developing such plans and seek subsequent clarification relating to the amendment on potential issues. For this reason, an extension to October 20, 2017 is again requested.

This action would provide CSU campuses time to coordinate with State and Regional board staff to discuss our comments, ideas and to thoughtfully consider the components of the implementation plan, which we believe will help approach consensus before the State Water Resources Control Board hearing on the proposed amendment to the Phase II Small MS4 General Permit. We look forward to being partners with the Board in this process.

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Chico
Dominguez Hills
East Bay

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Humboldt
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Thank you in advance for your consideration. We look forward to hearing from you and working with the Board's representatives.

Should you have any questions, please do not hesitate to call me at (562) 951-4120.

Sincerely,



Dr. Steven Lohr
Chief of Land Use Planning and
Environmental Review

SL:cc

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