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SANTA BARBARA • SANTA CRUZ

ENVIRONMENTAL MANAGERS WORK GROUP

December 14, 2012

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



RE: Comment Letter – 3rd Draft of Phase II Small MS4 General Permit

As the Chair of the Environmental Managers Work Group and on behalf of the ten University of California campuses, I am submitting comments on the most recent revisions to the 2012 Draft Phase II Small MS4 General Permit (Draft Permit). State Water Resources Control Board (SWRCB) staff have done an outstanding job of collaborating with stakeholders during this process and we are very pleased to see many of our previously suggested revisions incorporated into this version of the permit.

The University of California appreciates the opportunity to work with the SWRCB on this permit and assist with the Board's mission to protect and improve water quality in California.

Thank you for your consideration,

A handwritten signature in blue ink that reads "Julie A. Hampel".

Julie A. Hampel  
Environmental Managers Work Group, Chair

University of California Environmental Managers

Comments on proposed Waste Discharge Requirements (WDRs) for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) (General Permit)

December 14, 2012

#	Section(s)	Page	UCEM Comment	Suggested Revision (Text in <i>bold italics</i> = new language)
1	F.5.c. Public Involvement and Participation Program	107	Suggest adding “Area Sign” as a communication option to give permittee’s flexibility for high priority storm drain areas with closely spaced storm drain inlets.	F.5.c.(ii) Implementation Level (ii) Implementation Level – The Permittee shall, at a minimum:  (a) Ensure that high priority storm drain inlets <del>(e.g., storm drain inlets in high foot traffic areas)</del> include a labeled, stenciled, or other effective method of communicating a storm water awareness message ( <b>e.g., area sign</b> ) such as “drains to creek” or “only rain in the drain”.
2	F.5.d.1. Field Sampling to Detect Illicit Discharges	108	Suggest adding language to give permittee’s the flexibility to investigate, identify, and correct illicit discharges without sampling when feasible.	F.5.d.1. Field Sampling to Detect Illicit Discharges (i) Task Description – Within the second year of the effective date of the permit (e.g., while conducting the outfall inventory under Section F.5.d. Outfall Mapping), the Permittee shall sample any outfalls that are flowing or ponding more than 72 hours after the last rain event <b>if the source of the discharge cannot be identified.</b>
3	F.5.d.1. Field Sampling to Detect Illicit Discharges	108	Suggest editing text to make the requirement more clear.	F.5.d.1. Field Sampling to Detect Illicit Discharges (i) <b>While conducting the outfall inventory under Section F.5.d. Outfall Mapping, if an outfall is flowing or ponding and it has been 72 hours or more since the last rain event, then the Permittee shall sample the discharge if the source of the discharge cannot be identified.</b>  (ii)(a) <b>If there is a flow (or discharge) that cannot be identified, then conduct monitoring for the indicator</b>

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				<p><i>parameters identified in Table 1.</i></p> <p>(ii)(a) <i>If the Action level Concentration included in Table 2 is exceeded then conduct follow up investigations per Section F.5.d.2.. If the Action Level Concentration is not exceeded then no further action is required.</i></p>
4	F.5.g.2. Low Impact Development (LID) Design Standards	123	<p>UC campuses request the flexibility of a “no net increase” approach to run-off when implementing the Low Impact Development (LID) Design Standards. By viewing the campus as a whole, LID can be implemented outside of the boundaries of a specific project but within the campus, allowing them to be located where they will provide the greatest water quality benefit.</p>	<p>F.5.g.2. Low Impact Development (LID) Design Standards</p> <p>(ii) Implementation Level</p> <p><b><i>The permittee may implement the required measures under F.5.g.2. for development projects at any comparable project or projects owned by the permittee and located within the Phase II MS4 Non-traditional boundary.</i></b></p>
5	F.5.g. Post Construction Storm Water Management	122 123	<p>Suggest revising the project size criteria in the site design measures and Low Impact Development (LID) standards to be</p>	<p>Replace the project size criteria in the site design measures and Low Impact Development (LID) standards to:</p> <p><b><i>New development projects that create 10,000 square feet or more of impervious surfaces; hillside development</i></b></p>

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	Program F.5.g.1. Site Design Measures F.5.g.2. Low Impact Development (LID) Design Standards		consistent with the project sizes specified in the Phase I Permit.	<p><b><i>projects that create 5,000 square feet or more of impervious surface which is located in an area with known erosive soil conditions, where the development will grade on any natural slope that is twenty-five percent or greater; or development projects located within, directly adjacent to, or discharging directly to an Environmentally Sensitive Area (ESA), which either creates 2,500 square feet of impervious surface on a proposed project site or increases the area of imperviousness of a proposed project site to 10 percent or more of its naturally occurring condition. “Directly adjacent to” means situated within 200 feet of the ESA. “Discharging directly to” means outflow from a drainage conveyance system that collects runoff from the subject development or redevelopment site and terminates at or in receiving waters within the ESA.</i></b></p>
6	Attachment A	9	UC Davis is listed as a “new” Traditional MS4 on page 9 in Attachment A. This should be removed because UC Davis is a renewal Non-Traditional MS4 as correctly included on page 8 of Attachment B.	Please remove reference to UC Davis on page 9 of Attachment A