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OFFICE OF THE EXECUTIVE VICE PRESIDENT—
 CHIEF FINANCIAL OFFICER

OFFICE OF THE PRESIDENT
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OFFICE OF RISK SERVICES

September 19, 2013

Jeanine Townsend, Clerk to the Board
 State Water Resources Control Board
 1001 I Street, 24th Floor
 Sacramento, CA 95814

University of California Comments – Industrial General Permit

Dear Clerk Townsend:

These comments on the draft Industrial General Permit are submitted on behalf of the ten campuses comprising the University of California system (hereafter, the University). The University would like to acknowledge its appreciation for the collaborative approach that State Water Resources Control Board (SWRCB) staff have taken over the last two years during this storm water permit revision process. The current draft reflects the tremendous amount of effort put into this process by staff and stakeholders on this challenging permit. The University supports the SWRCB's permit revisions that reduce the cost of compliance, exclude numeric effluent limitations, and streamline the regulatory process while protecting water quality.

- 1 **The University supports the current draft of the proposed permit and appreciates the opportunity to submit the following two comments. First, we request that the SWRCB consider incorporating allowances or credits for low impact development/green infrastructure improvements that are implemented at permitted industrial sites. Specifically, for runoff volume reduction improvements and the corresponding pollutant load reductions the University supports CASQA's comment on this issue:**

The re-issuance of the Industrial General Permit provides a platform for the State Board to promote green infrastructure improvements at industrial sites and support existing local, state, and nationwide objectives. CASQA urges the State Board to create opportunities and incentives for industrial dischargers to utilize LID as a pathway to IGP compliance. One approach to consider is from the sector-specific general storm water permit adopted by Region 8 in 2012 where a credit is provided for implementing volume reduction BMPs. This approach to incorporating LID measures in compliance evaluations was developed through a collaborative effort between dischargers, NGOs and Region 8 staff and should be considered as a model for this statewide IGP.

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- 2 Secondly, the University requests that the SWRCB consider advancing the permit effective date from January 1, 2015 to July 1, 2015 to prevent overlap and/or confusion between the monitoring, inspection, and reporting requirements of the existing Industrial General Permit (covering July 1, 2014 – June 30, 2015) with the proposed effective date of the new revised permit. If you have any questions, please feel free to contact me at Robert.Charbonneau@ucop.edu or 510.987.9594.

Thank you very much for your consideration.

Sincerely,



Robert Charbonneau
Director – Environmental & Emergency Services
University of California
Office of the President