



September 3, 2013

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

Re: Comment Letter- Industrial General Permit

Dear Ms Townsend,

Council for Watershed Health has reviewed the State Water Resources Control Board 2013 *Draft Industrial General Permit* and appreciates the opportunity to provide comments.

We have managed the San Gabriel River Watershed Regional Monitoring Program since 2005 and the Los Angeles River Regional Monitoring Program since 2008. These coordinated monitoring programs, funded through NPDES permit conditions, bring together watershed managers, regulators, academics and non-profits to produce watershed-wide knowledge.

With this experience, we encourage the 2013 IGP to support a quantitative and coordinated monitoring approach that is engaged with existing watershed monitoring programs where available. Specifically, where individual dischargers or Compliance Groups discharge to receiving waters, we encourage that these entities be required to contribute to and participate with monitoring programs workgroups to reduce redundancies in monitoring efforts, reduce monitoring costs to the permittees, and to improve data quality. This approach will assist watershed managers in understanding the role of industrial discharges in context with other permitted discharges throughout the watershed lending to more efficient and effective management decisions.

Sincerely,



Nancy L.C. Steele, D.Env.
Executive Director