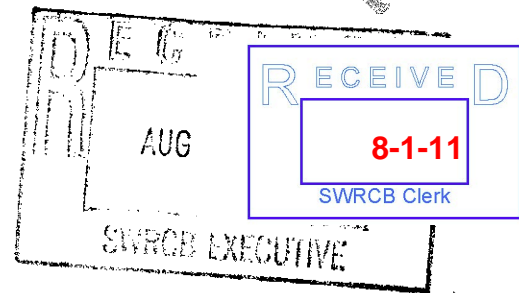




July 28, 2011

Ms. Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000



Subject: Comments on the DRAFT National Pollutant Discharge Elimination System Permit (NPDES) for Storm Water Discharges from Small MS4s

Dear Ms. Townsend,

This letter is in response to the invitation to submit comments on the subject draft NPDES permit changes, in particular the provisions of the Non-Traditional Small MS4 sections which will apply to College of the Canyons (COC). In reviewing the Notice of Opportunity for Public Comment, the Fact Sheet (supporting the Water Quality Order) and the Draft Permit, there is no mention of storm water analyses which could be used as the basis for identifying an institution such as COC as a Non-Traditional Small MS4 Permitted source. There is no known sampling and analytical data which suggests COC is responsible for or a contributor to, the impaired surface water quality within this watershed. Without affirming COC is a significant contributor of pollutants, there is no scientific basis for extending the existing requirements as proposed.

What is the reason COC is being placed into this new Non-Traditional Small MS4 category specifically? Placement in this category will represent a HUGE financial burden on COC, with no obvious corresponding environmental benefit to the College, the City or the Watershed.

There has been no attempt to document COC as responsible for a discharge volume which makes up more than 10 percent of the storm water flowing into the permitted MS4. The SWRCB cannot say COC's total storm water volume indicates it is a significant contributor of pollutants to the permitted MS4 (managed by the City of Santa Clarita). COC should be given the chance to document the quantity and quality of storm water being discharged before being designated as a Non-Traditional Small MS4 Permitted source, as proposed. Further, *there has been no compelling evidence presented to show this 10 percent threshold (which defines a significant contributor of pollutants to the permitted MS4) is inappropriate for COC - at all!*

The first step would be to request storm water sampling data of COC to determine if:

- 1) COC is responsible for surface water quality impairment and;
- 2) The data generated supports placement of COC in the new Non-Traditional Small MS4 category.

If there is current data, COC is requesting it be provided to support the intended action. The lack of current data means there is no metric or basis to document storm water quality. As a result there is no way to know whether storm water quality has improved (the proper goal of the proposed changes) or diminished over time!

The SWRCB is urged to delay the proposed NPDES General Permit changes to allow time for sources within this proposed new category to develop the analytical data to establish whether the proposed action is appropriate.

Should you have any questions, please don't hesitate to contact the environmental consultant for the Santa Clarita Community College District, Mr. B.J. Atkins of *Atkins Environmental HELP, Inc.* at (800) 750-0622 or www.bj@atkinsenvironmental.com.

Best Regards,

A handwritten signature in black ink, appearing to read "Carl Ebaugh", with a long horizontal flourish extending to the right.

Carl Ebaugh
Director, Central Energy Systems & Regulatory Compliance
College of the Canyons

Cc: Gensen Kai, Regional Water Quality Control Board
B.J. Atkins, *Atkins Environmental HELP, Inc.*