



February 3, 2005

SPECIAL HEARING

2/3/05

cc: BD, DI, DWQ

e-cys: BD, CC, HMS, TH, CMW

Ms. Debbie Irvin, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
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Sacramento, CA 95812-0100

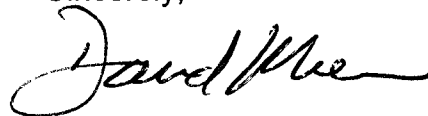
Re: Comments on the Reissuance of the National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Associated with Industrial Activities (Industrial General Permit), December 2004 Draft

Members of the State Board:

The San Diego Unified Port District (District) reviewed the proposed draft General Permit for Discharges of Storm Water Associated with Industrial Activities (Draft Permit), released on December 15, 2004. While the District supports efforts that will improve management of industrial stormwater, we are concerned that the changes and additional requirements outlined in the Draft Permit are not cost effective and may not result in direct improvements to water quality. We believe there may be better, more constructive ways to achieve these goals other than those currently outlined in the Draft Permit.

The California Association of Port Authorities (CAPA), on behalf of the Ports of California, submitted a letter outlining specific comments on the Draft Permit. The District supports the submittal of this letter and its contents. We appreciate the opportunity to review and comment on the Draft Permit and trust that our comments and those of CAPA will be considered.

Sincerely,



David Merk, Director  
Environmental Services Department

DM:MW:rg  
File: SWRCB  
Docs #115191