



DEPARTMENT OF DEFENSE
REGIONAL ENVIRONMENTAL COORDINATOR, REGION 9
937 N. Harbor Drive, Box 81
San Diego, California 92132-0058

(4/1/14) Board Meeting
Final Draft IGP
Deadline: 3/4/14 by 12:00 noon



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March 3, 2014

Ms. Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Subject: COMMENT LETTER - APRIL 1, 2014 BOARD MEETING: FINAL DRAFT
INDUSTRIAL GENERAL PERMIT

On behalf of the Department of Defense Regional Environmental Coordinator in California, we appreciate the opportunity to provide comments on the Draft General Permit for Storm Water Discharges Associated with Industrial Activities (IGP).

We appreciate the Board's careful consideration of our previously submitted comments. We also thank the Board for holding public workshops and working with us to resolve many of our concerns. The revised IGP greatly reduces our administrative burden while remaining protective of water quality. While this Final Draft continues to present a significant compliance challenge, we look forward to partnering with the Board to achieve full compliance.

I also want to thank and acknowledge the Board for beginning a review of the Storm Water Program to consider the significant contribution 'source control' could provide. The addition of a source control component to the storm water permitting efforts, for example the control of pollutants from automobile use, could be a more direct and cost effective method to reduce the level of contaminants entering water bodies statewide. We all operate in an environment of limited resources and share the goal of maximizing the environmental benefit of our IGP compliance investments. We further believe that many of these measures will also have significant co-benefits to California's air quality program and look forward to working with you on this effort.

If you have questions or concerns regarding this letter please contact Michael Huber at (619)532-2303 or Chris Haynes at (619) 532-2285.

Sincerely,

C. L. STATHOS
By direction