



State Water Board staff,

The effective date of the draft general permit should be moved to July 1 to harmonize with the annual cycle of the outgoing industrial general permit. If the new general permit becomes effective January 1, dischargers will still need to file an annual report by June 30 covering the previous July 1-December 31 under the provisions of the old permit. Why not start with a clean slate and launch the new permit when the old permit has completed an annual cycle?

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