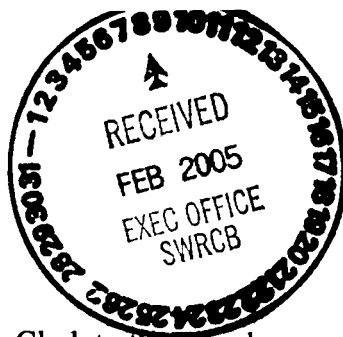




**JOHN WAYNE  
AIRPORT**  
Orange County, California

**Alan L. Murphy**  
Airport Director

February 3, 2005



Ms. Debbie Irvin, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor [95814]  
P.O. Box 100  
Sacramento, CA 95812-0100

**Re: Comments of John Wayne Airport Regarding Reissuance of the  
Storm Water Industrial General Permit – Draft Permit Documents  
issued December 15, 2004**

Dear Ms. Irvin

John Wayne Airport is pleased to provide comments on the Draft General Permit for Storm Water Discharges associated with Industrial Activities, issued by the State Water Resources Control Board (Board) for public comment on December 15, 2004 (2004 Draft).

John Wayne Airport and the County of Orange have a long time commitment to preserving and protecting the environment. We have established a very effective Environmental Compliance Monitoring Program. Towards this end, we have been participants in County and State Storm Water Quality Task Forces since the early 90's. John Wayne Airport and its tenants have spent several million dollars implementing Structural and Operational Best Management Practices which includes a very aggressive training and monitoring program.

We believe that while there is always room for improvement, the mechanism for this improvement lies within the framework of the current permit policies and programs.

John Wayne Airport is concerned that some of the proposed changes could have significant negative impacts on doing business in California without corresponding benefits to water quality. The following is a discussion of some of the proposed changes and their potential impacts:

#### **BMP Effectiveness and Iterative Approach**

John Wayne Airport supports the application of assessing BMP effectiveness and the iterative approach as the mechanism for demonstrating permit compliance. Since the inception of the General Industrial Permit, the concept of the iterative process for BMP development and SWPPP compliance has been the cornerstone of the permits and the SWPPP management process.

Before permit compliance can be based on a numeric performance criteria, the development of that criteria should be accomplished through a defined and scientifically defensible process in accordance with EPA protocols, which consider factors other than analytical monitoring, and that ensures that the performance criteria is

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