



November 4, 2005

Chairman and Members of the Regional Board and Cleanup Advisory Team  
San Diego Regional Water Quality Control Board  
9174 Sky Park Court, Suite 100  
San Diego, CA 92123

Dear Chairman and Members of the Regional Board and Cleanup Advisory Team  
Members:

Environmental Health Coalition has the following comments on the Order of Proceedings issued October 18, 2005 paragraph 3.

1. The schedule is overly long. We recommend that phases IV and V be collapsed into one comment period with the 30-day rebuttal to the comments running concurrently with the 60-day staff response to comments. Under this scenario, the staff would NOT respond to the rebuttal comments and the parties can make their case at the hearing. Phase IV is a redundant measure. We would further recommend that the 60 day response to comments and the 45 day preparation be collapsed into one 90 day preparation period.

We understand that the rest of the Order is subject only to discretionary review by the Regional Board. For the Regional Board members, we add these comments that we believe will make this process more fair and transparent to the public.

1. We support the decisions related to designation of parties. We believe that it is appropriate to include our organizations and the San Diego Port Tenants as designated parties.

2. The Proceedings Order should specify that translation will be provided by the Board if it is needed at the hearing in accordance with the Cal EPA Environmental Justice Guidelines for public participation.

3. The Proceedings Order should indicate that the hearing will be held in the impacted communities. There are many locations where such a hearing can be more appropriately held. Just a few are: King/Chavez School, County Administration Building, Perkins Elementary, Memorial Academy, Meeting rooms at the Port District, the old restaurant site used by the Port, Holiday Inn on the Bay, San Diego City Council chambers or meeting rooms and many other sites. Please contact us for a full list.

Thank you for the opportunity to comment on these proceedings.

Sincerely,  
ORIGINAL SIGNED BY

Laura Hunter, Director  
Clean Bay Campaign