



# San Diego Military Advisory Council

## 5330 Napa Street

### San Diego, California 92110

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Mr. Charles R. Hoppin  
Chair, State Water Resources Control Board and members of the Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Hoppin and Board Members,

The San Diego Military Advisory Council (SDMAC) is a not-for-profit 501(c)(6) mutual benefit corporation that supports, promotes and represents the common business interests of the military, its quality of life, and the defense industry in the San Diego area. SDMAC has over 120 corporate members and over 300 individual members. Our corporate members employ over 50,000 people across all industries in the region. Our San Diego Military Economic Impact Study, released in April 2010, indicates that the economic impact of the military presence in the San Diego region alone was over \$28 Billion in 2010. The purpose of this letter is to advise you and the members of your board that SDMAC has great reservations that the draft Toxicity Policy will significantly affect the national defense mission in San Diego.

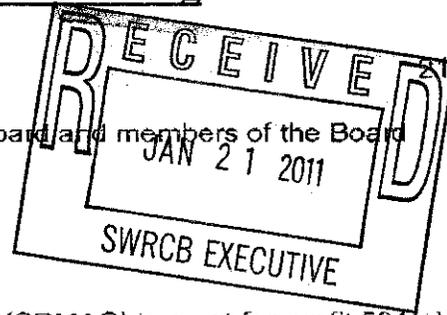
SDMAC is aware that the Industrial Environmental Association, (IEA) has provided the board with technical comments regarding the Toxicity Policy. SDMAC strongly endorses the IEA comments, specifically that... "The policy compliance schedule is overly restrictive. Dischargers will have difficulty coming into compliance with the limitations that are set forth within the policy".

These overly restrictive limitations will adversely impact the operational readiness of the U.S. Navy's Pacific Fleet, the majority of whom are homeported in San Diego. The proposed policy would curtail and impede the use of existing Navy piers for required ship maintenance. The inability of the Navy to use existing piers for routine ships maintenance could significantly impact Navy homeporting decisions and may force the Navy to relocate ships to other states on the West Coast. The resulting loss of repair and maintenance work would have a negative impact on employment in the San Diego region and be a tremendous blow to California's economy.

SDMAC strongly recommends that the Board incorporate the more commonly accepted toxicity testing and data analysis methods to account for the variability in storm water and other factors proposed by the IEA. There is no greater caretaker of the nation's environment than the United States Navy, as demonstrated on a daily basis by the leadership role they have taken in environmental issues. SDMAC believes that acceptance of the standards proposed by IEA, are not only in keeping with good scientific methodology, but will also serve to ensure that the Navy's economic contribution to the State of California is preserved.

Sincerely,

*L.B. Blumberg*  
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Executive Director  
San Diego Military Advisory Council



21 Jan. 2011