



**SAN DIEGO  
REGIONAL  
CHAMBER OF  
COMMERCE**

404

EMERALD PLAZA  
402 West Broadway, Suite 1000  
San Diego, California 92101-3585  
Tel 619.544.1300  
www.sdchamber.org

September 27, 2004

Item 9 9/30 BM

Pete Silva  
State Water Resources Control Board  
1001 "I" Street  
Sacramento, CA 95814

cc: Bd, DI

email: Bd, cc, TH, AMS, CMW, DWK

**RE: State Water Resources Control Board  
September 30 Hearing - 303 (d) Listing Policy**

Dear Pete:

On behalf of the San Diego Regional Chamber of Commerce, I would like to express serious concerns regarding the recent staff changes in the *Water Quality Control Policy for Developing California's Clean Water Section 303(d)* (listing policy) which the State Water Resources Control Board is scheduled to hear and adopt next Thursday.

Over the course of several years, water supply agencies, municipalities, publicly owned treatment works, homebuilders, commercial properties, industrial facilities and the agricultural community have worked together to address real water quality problems and developed a reasonable, workable, and practicable listing policy, which was supported by the Regulated Caucus. However, the latest draft of the policy just released by staff in September has taken a serious change of direction to the recommendations of the stakeholder group and is unreasonable and unacceptable.


The most burdensome recommendations in the September 8 staff draft make listing of water bodies easier and delisting more difficult without using sound scientific methods. The Total Maximum Daily Load (TMDL) program will become so complicated that it could become impossible to adhere to. Further, unnecessary measures should not be part of the Listing Policy, and there is little or no credible data to support some of the historical listings of water bodies in San Diego County.

These types of proposed changes could prove extremely costly for business, and especially small business. Businesses realize that water quality improvements are important for everyone and are already doing their share to comply with environmental regulations.

While you are trying to improve the efficiency and effectiveness of the State, this new policy is contrary to that goal. Therefore, we urge you to oppose the direction the Listing Policy is taking and support the earlier version, which is supported by stakeholders.

Thank you for your consideration of our request.

Sincerely,

  
Eugene Mitchell  
Vice President, Public Policy and Communications

EM:av