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*Via electronic submission: [industrialstormwatercomments@ecy.wa.gov](mailto:industrialstormwatercomments@ecy.wa.gov)*

April 20, 2007

Jim LaSpina  
Water Quality Program  
Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA

RE: Comments on Draft Industrial Stormwater General Permit

Dear Mr. La Spina:

This letter is a request that Washington Department of Ecology (Ecology) withdraw the proposed Industrial Stormwater General Permit (ISWGP), extend the current permit for an interim period, and utilize the Stormwater Advisory Group to assist in the critical flaws. We support the reasons listed in the comment package presented by Northwest Food Processors Association.

We understand that Ecology has the option to:

- a. Administratively extend the current permit,
- b. During the extension period, issue temporary individual stormwater permits to new applicants that are identical to the current general permit,
- c. Roll these individual permits into the new general permit, once it is issued.

Ecology has an Industrial Stormwater Advisory Group in place that can assist you in re-working the permit. We urge you to utilize them in a process that more closely evaluates many of the recommendations in the 6415 Report, which we believe hold great promise of simplifying the permit and improving compliance, without compromising water quality.

We appreciate the opportunity to provide our comments. If you have any questions, please call me at (209) 394-5352.

Sincerely,

Beth Kelly  
Assistant Manager Environmental Affairs  
On behalf of Environmental Affairs Department  
Foster Farms

cc: Jim Marnatti, Foster Farms