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Mr. Bill Orme
Senior Environmental Scientist
Chief, 401 Certification Unit
Division of Water Quality
State Water Resources Control Board
101 "I" Street, 15th Floor
Sacramento, CA 95814

Subject: Proposed VGP requirements pursuant to Section 401 of the Clean Water Act (33 U.S.C. § 1341) and the Porter-Cologne Water Quality Control Act (Water Code, § 13000 et seq.)

Dear Mr. Orme:

On behalf of the Port of San Diego Ship Repair Association (SDSRA), clarification related to the following Draft Condition is requested.

Additional Condition No. 13

If the only discharge from a vessel is ballast water, and that vessel never leaves a single COTP Zone, as defined in 2.2.3.5.3.1 of the Proposed 2013 Vessel General Permit (VGP) and/or the "same port or place" where the ballast water originated (per SLC Invasive Species Program (Title 2, Division 3, Chapter 1, Article 4.6)), is a SWRCB monitoring study required as defined in attachment A to the Draft Order for Clean Water Act Section 401 Water Quality Certification?

We thank you in advance for the opportunity to comment on the Draft Certification.

Sincerely,

Joe Pritchard
Chairman
Port of San Diego Ship Repair Association

Cc: Mr. Derry Pence, SDSRA President