



March 4, 2014

**Submitted Via Email:** [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

**RE: Airlines for America Comments on the California Water Resources Control Board's 2014 Draft National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharge of Storm Water Associated with Industrial Activities**

To Whom It May Concern:

Airlines for America ("A4A") appreciates this opportunity to comment on the California State Water Resources Control Board ("Board") proposed 2014 Draft National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharge of Storm Water Associated with Industrial Activities which was made public on February 19, 2014 ("2014 Draft IGP"). A4A is the principal trade and service organization of the U.S. airline industry.<sup>1</sup> Its member airlines and their affiliates transport more than 90 percent of all U.S. airline passenger and cargo traffic. As such, A4A frequently comments on regulatory activities that affect the airline industry and air travel in the United States. A4A and its airline members take environmental protection seriously and, as set out in detail in our previous comments,<sup>2</sup> have a strong record of advancing environmental goals.

The 2014 Draft IGP incorporates changes from the 2013 Draft IGP,<sup>3</sup> which respond to some of the comments A4A submitted on the 2013 Draft IGP.<sup>4</sup> Although many of A4A's comments on the 2013 Draft IGP have not been addressed the Board affirmatively has closed off any further

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<sup>1</sup> The members of A4A are: Alaska Airlines, Inc., American Airlines, Inc., Atlas Air, Inc., Delta Air Lines, Inc., Federal Express Corporation, Hawaiian Airlines, JetBlue Airways Corp., Southwest Airlines Co., United Airlines, Inc., UPS Airlines, and US Airways, Inc. Air Canada is an associate member.

<sup>2</sup> "Airlines for America Comments on the California Water Resources Control Board's 2012 Draft National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharge of Storm Water Associated with Industrial Activities," dated October 22, 2012.

<sup>3</sup> Draft National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharge of Storm Water Associated with Industrial Activities dated ("2013 Draft IGP")

<sup>4</sup> "Airlines for America Comments on the California Water Resources Control Board's 2013 Draft National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharge of Storm Water Associated with Industrial Activities," dated September 19, 2013.

discussion of those comments at its upcoming hearing.<sup>5</sup> A4A assumes the Board has not yet made any decisions regarding comments on the Draft 2013 IGP which have not been reflected in the 2014 Draft IGP and, at a minimum, expects that the Board will provide a detailed response to all comments on the Draft 2013 IGP when providing the required rationale for the provisions of any final issuance of the IGP. In the meantime, A4A stands ready to provide any further information or other input necessary to facilitate the Board's consideration of our comments on the 2013 Draft IGP. We ask the Board to duly consider our previous comments and encourage its staff to contact us as necessary to facilitate consideration of those comments.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Tim', with a large, stylized initial 'P' at the top.

Timothy A. Pohle  
Senior Managing Director, Environmental Affairs

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<sup>5</sup> NOTICE OF ADOPTION MEETING AND NOTICE OF AVAILABILITY OF DRAFT DOCUMENTS FINAL DRAFT STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR THE DISCHARGE OF STORM WATER ASSOCIATED WITH INDUSTRIAL ACTIVITIES (INDUSTRIAL GENERAL PERMIT), dated February 19, 2014 (“The State Water Board will only accept written and oral comments that are limited to the identified proposed revisions to the Final Draft Industrial General Permit made since July 19, 2013.”)