



**BOARD OF SUPERVISORS  
COUNTY OF MADERA**

MADERA COUNTY GOVERNMENT CENTER  
209 W. YOSEMITE AVENUE / MADERA, CALIFORNIA 93637  
(559) 675-7700 / FAX (559) 673-3302 / TDD (559) 675 8970

## MEMBERS OF THE BOARD

FRANK BIGELOW  
VERN MOSS  
RONN DOMINICI  
MAX RODRIGUEZ  
GARY GILBERT

BONNIE HOLIDAY, Chief Clerk of the Board

February 2, 2005

Ms. Debbie Irvin  
Clerk of the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814  
Fax: (916) 341-5620

Subject: Support for draft General Industrial Storm Water Permit

Dear Ms. Irvin,

The County of Madera is in support of the draft General Industrial Storm Water Permit as proposed, but with the following reservations.

The draft General Industrial Storm Water Permit (Permit) requires increased monitoring of pollutants, whose presence are to be compared to US EPA benchmark values or some other established numeric limits. Pollutants exceeding these limits will require corrective action. Exceeding of numeric limits will presume blame for discharge on the owner of the property, when in fact, specific contaminants may be the result of offsite or upstream activities unrelated to the permitted site.

The costs associated with presumed blame will place an unnecessary burden on already financially challenged counties, such as Madera County. Therefore, the County does not support the imposition of numeric limits and requests the State Water Resources Control Board remove the requirement from the draft Permit.

Thank you for you time and consideration on this matter, and we would ask that the County be kept informed of future developments with this permit.

Sincerely,

  
Gary Gilbert, Chairman  
Madera County Board of Supervisors

Cc: RCRC

SPECIAL HEARING  
2/3/05

cc: BD, DI, DWQ

e-cys: BD, CC, HMS, TH, CMW