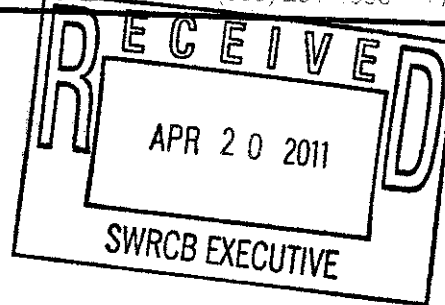




Pacific Management Services

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State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



April 13, 2011

RE: Draft Industrial General Permit

To Whom It May Concern:

I understand that The State Water Resources Control Board is now accepting comments regarding the draft Industrial General Permit (IGP). I hope that the Board will reconsider some areas of the proposed permit.

It is obvious that the Water Board has spent considerable time and effort in trying to create a fair, yet effective draft permit. It is also plain to see that the intention of the draft permit is to improve water quality and not to punish businesses. However, I believe that the businesses who are complying with the current permit will not view it in such a way.

While working in the field of Environmental Compliance, our company has encountered many businesses that are required to monitor their Storm Water runoff. Some have decided to hire our company to help make sure they are in compliance, while others decide not to report at all.

They either feel that the reporting process is too expensive, time consuming, or overwhelming for them. And yes, there are companies that decide they will take the least expensive route and do nothing about their Storm Water runoff until they are officially caught and are forced to do so.

Some of our clients, who do their best to comply, are feeling betrayed by the State Water Board. They have been taking samples, making observations, and reporting as required. Yet now they will have added burdens placed on them, while their neighbors who are not complying simply get away with it. I'm sure you can imagine the frustration they must feel.

Good water quality will never be achieved until the vast majority of polluters are finally doing their share by complying. And that will never happen if businesses feel overwhelmed and intimidated by the requirements. If current businesses who are complying are feeling overburdened then it only stands to reason that those who are not complying now are not going to start.

As you are well aware, local agencies are already stretched to the breaking point. Wouldn't it be beneficial to use the limited resources available to allow inspectors to find those who are not complying? Perhaps then the educational route can be taken. Educate businesses on who needs to monitor storm water. Show them that it isn't difficult and doesn't need to be overwhelming for them. Make it as simple for them as possible, and they won't fight it.

However, the draft permit doesn't make it simple. It adds to the burden, both financially and through lost work production. Instead of creating an environment of resentment, create one where people can easily do their fair share.

Find those who are not currently complying. Then either get them on board through education or noncompliance fees. But until the majority of businesses are on board, the additional requirements, samples and observations will not make a difference. People will be less likely to comply at all. Water quality will not improve. And isn't good water quality the ultimate goal?

Sincerely,

Jo Hansen
General Manager