



April 18, 2011

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Clerk of the Board
State Water Resources Control Board
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Comment Letter-Draft Industrial General Permit

The changes proposed to the General Permit seem to be clearly written and easy to understand, or at least for me, we have had a permit for the last 15 years as has been to requirement. I have been and remain extremely concerned that there is a very high degree of non-participation in the permit process. When I read that there are only about 1500 permits in California and only 59% of those are current or renewed I think that making this process even more difficult will not really solve the problem of actual non-compliance.

For people like us who follow the rules and obtain the permits required in California it is particularly aggravating to see how many businesses don't. I see nothing in the new regulations that addresses non-compliance. Although this permit and its requirements are very costly to business the cost of non-compliance is even greater if we are to believe any of this is necessary in the first place.

I feel that as one of the very few permit holders in Wilmington California I may be and have been singled out and placed under scrutiny only because I have a permit whereas nobody else does. In other words enforcement seems to be placed on those with permits and not those without. This is only my opinion and concern as one who is struggling to survive this State.

My real reason for writing this is to convey my concern over the requirement that the SWMPP be developed and/or approved by an engineer. I don't mind going to a three day class to get a certification but the engineer degree required for this stage of the permit is onerous in my opinion. The will only cause a more extortive process for compliance and cause that many more people top be non-compliant with this regulation. The Board should make this easier not more difficult.

Sincerely

Robert Lively