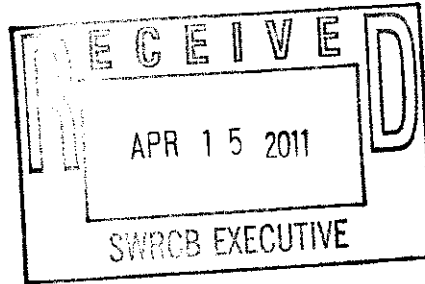


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State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



April 11, 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 which may put undo expense and hardship on many businesses in California.

During these economic times, businesses, as well as government agencies, have been forced to cut employees and increase the work loads for those lucky enough to still have jobs. After all of these sacrifices they are still treading water and trying to stay afloat. The following draft permit additions will only add to their burden.

- The addition of numerous visual observations, Ineligible Storm Event recording, Pre-storm Inspections, as well as Field Measurements, will not only force businesses to purchase specialized equipment they will also take man power away from the productivity of the business.
- The increase of Qualified Storm Events will, at a minimum, double the cost of an already expensive enterprise. And once again, taking samples and transporting them to the lab removes manpower from the business. Furthermore, requiring a business to assign and send an individual to be trained as a Qualified SWPPP Practitioner will undoubtedly become yet another expense for the business.
- The requirement that the SWPPP be written by a Qualified SWPPP Developer (QSD) is going to be extremely costly for businesses. Since few professionals are even eligible to receive the statewide training protocol, the fee of those who are trained is going to be extremely high. Would it not be feasible for anyone who has completed the statewide training protocol to write a SWPPP and then have the plan certified by a Professional Engineer? This could possibly increase the number of prospective QSDs and thus lower the cost for businesses.

It is obvious that The Storm Water Resources Control Board has spent many long hours trying to find a way to solve the problem of pollution in California's Storm Water. ***I agree that increasing the samples and observations will definitely help the Storm Water Pollution problem...But you need to increase the samples and observations from businesses that are currently doing NOTHING!*** Increasing the requirements for businesses that are doing their best to comply, while simply trying to survive in these economic times will not solve the problem. It will only make those who are out of compliance less likely to start doing their share.

Furthermore, the government agencies charged with enforcing the new regulations are forced to function with skeleton crews. How can they possibly find the real polluters when they are overloaded with policing those businesses that are not the problem?

Small businesses are the backbone of California's economy. These small businesses are counting on you to carefully weigh the impact the draft Industrial General Permit will have on them and their futures. I appreciate the opportunity the Water Board has given business in allowing us to share our comments. Thank you.

Respectfully,

L. Dean Lowe Ph.D