

L.G. EVERIST, INC.



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April 22, 2011

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

via Email: commentletters@waterboards.ca.gov

Reference: Draft Industrial General Stormwater Permit – Comments

Dear Ms. Townsend:

Thank you for the opportunity to address the issue of the growing cost of compliance for industrial companies doing business in California.

L.G. Everist, Inc. owns and operates several wharfs in the Port of Long Beach, and we have been operating under the Port's general stormwater plan for a number of years. We have always taken the lead in educating and working through issues with our tenants regarding the core goals of the regulation: Best Management Practices ("BMP").

We feel that this approach has yielded excellent results for not only water quality but for the awareness and timely prevention of casual pollutants as well as more toxic matter. Further, we have seen a very encouraging trend of better overall housekeeping. Simply put, sweeping the parking lots regularly has been a huge success.

These efforts, along with aggressive inspection and follow-up, make up compliance costs of over \$100,000 per year. This is a burden that has already reached a point that strains our basic cost of doing business.

We respectfully request that the California State Water Resources Control Board consider simply letting local agencies apply BMPs to operators within their jurisdiction as they deem necessary. We feel that this would result in an effective, straightforward and truly cost-efficient solution to issues that are already being addressed.

Sincerely,

R. A. Everist
 President and Chief Executive Officer

RAE/cka

cc via Email: Don Beaumont, L.G. Everist, Inc.
 James Vernon, Port of Long Beach