



JIM DOBBAS, INC.

ANTELOPE FACILITY

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

March 23, 2011

Re: Comment Letter – Draft Industrial General Permit

To Whom It May Concern:

These comments have been written on behalf of Jim Dobbas, Inc. in Newcastle, CA in regards to the State Water Resource Control Board's (SWRCB) proposed 2011 Draft Industrial General Permit for storm water discharges. We have several concerns with the new proposal and hope that the SWRCB will take our comments into consideration as they move forward with any revisions prior to adoption.

Jim Dobbas, Inc. currently complies with the Industrial General Permit requirements including annual updates to our Storm Water Pollution Prevention Plan and consistently training our employees on the importance of storm water pollution prevention. We have been in business for over 45 years and have continued to identify and eliminate hazards that could have an environmental impact on storm water. We would like to know what evidence and scientific research the SWRCB has to justify the claim that a new, more stringent permit is necessary.

Economic conditions within the state of California have been challenging for the past few years causing Jim Dobbas, Inc. to not only control expenses, but also make reductions that have impacted families in our employ and now we will be forced to incur a significant increase in regulatory burden. Did the SWRCB conduct a cost analysis and or an economic impact analysis *before* releasing this proposed permit?

Our company takes storm water pollution prevention very seriously and has continuously strived to and succeeded in complying with all of the requirements outlined within the existing permit. Jim Dobbas, Inc. has been a member of a storm water monitoring group that has assisted our company in meeting the permit requirements. Why would the SWRCB outlaw group monitoring which provides a key level of support to businesses in preventing storm water pollution?

Thank you for the opportunity to comment and for considering these views as you develop the final draft of the 2011 Industrial General Permit.

Sincerely,

Jacinda Dear
Administrative Associate
Jim Dobbas, Inc.

