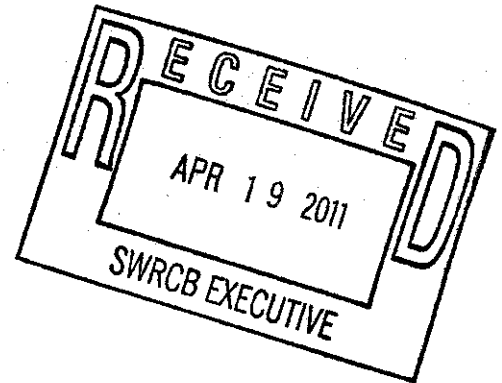




11033 Harrel St, Mira Loma, CA 91752



April 15, 2011

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

Re: Comment Letter – Draft Industrial General Permit

To Whom It May Concern:

These comments have been written on behalf of C. R. England Global Transportation in Mira Loma, 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.

- **Increased Costs:** the new permit will increase compliance costs on a parabolic scale. CTA has advised C.R. England to anticipate annual increases of at least 1000% which translates to about \$50,000 dollars first year. While the SWRCB did not conduct a cost analysis or an Economic Impact Analysis prior to the release of the proposed new permit, our particular cost increase has an extremely negative impact on the attractiveness of doing business in such a negative environment.
- **Unqualified Regulatory Burden:** prior to the release of the proposed permit, the SWRCB did not draw any scientifically based conclusions that would justify the necessity of implementing a new permit that will impose a significant regulatory burden upon businesses in California. The "Blue Ribbon Panel" employed by the SWRCB acknowledged that they conducted no scientific research in support of their claims that a new, more stringent permit is necessary to increase compliance. In fact the introduction of so-called qualified professionals to the compliance procedure only furnishes a second layer of insulation from responsibility in the accurate reporting and testing of storm water. This additional layer could result in decreased compliance.
- **Violation of Administrative Law:** The State Water Board has scheduled a hearing on the Industrial General Storm Water Permit and set a final comment deadline even though

the very notice for this rule states that it is "currently not in its complete form." This is a violation of California and federal law.

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.

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,

A handwritten signature in cursive script, appearing to read "James W. Ford".

James W. Ford

C. R. England Global Transportation