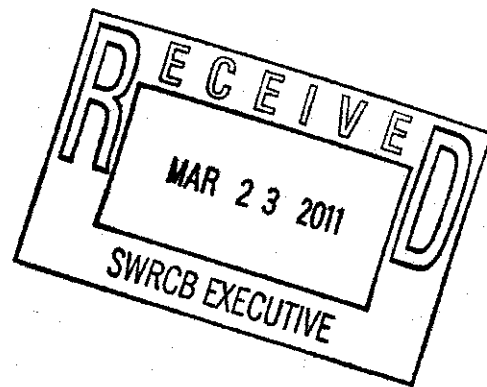


*J.W. Bamford, Inc.
1949 Kusel Rd.
Oroville, CA 95966*

March 18, 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 J.W. Bamford, Inc. in Oroville, 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.

Our biggest concern is that the new permit will dramatically increase the annual costs associated with compliance. The SWRCB did not conduct a cost analysis or an Economic Impact Analysis prior to the release of the proposed new permit. We are concerned that the anticipated spikes in annual costs will force businesses to close their doors permanently. Aside from the immediate burden it places on our business we understand that CTA is anticipating, at the very least, a 1000% cost increase for businesses within the trucking industry. We cannot run our business without available trucking companies to draw from. With trucking companies closing or leaving California, the effects will soon snowball and affect not only our business but be passed on to every industry that depends on transportation.

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. This new permit will impose a significant regulatory burden upon businesses in California. There is no existing evidence that shows that this permit is necessary. While the SWRCB employed a "Blue Ribbon" panel of academics, the panel acknowledged that they did not conduct any scientific research to support their claims that a new, more stringent permit is necessary.

The new permit will effectively outlaw group monitoring in the state of California and will require all facilities under the new Industrial General Permit to meet the same requirements on an annual basis. The elimination of group monitoring will impact those CTA members who currently participate in the California Trucking Association Monitoring Group (CTAMG) and effectively remove the added layer of compliance review that CTA members have relied upon since 1993 when CTAMG was first established.

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.

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 black ink, appearing to read "NATHAN BAMFORD". The signature is stylized with a large, sweeping flourish at the end.

Nathan Bamford
J.W. Bamford, Inc.