

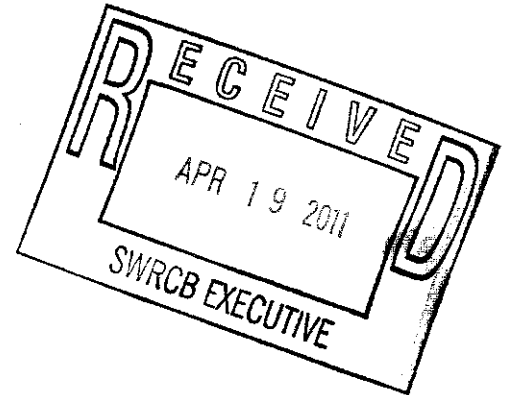


HEFFERNAN INSURANCE BROKERS

A Member of the Heffernan Group

April 4, 2011

Public Comment
Draft IGP
Deadline: 4/29/11 by 12 noon



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 Heffernan Insurance Brokers in Petaluma, 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
- Unqualified Regulatory Burden
- Removal of group monitoring
- Violates administrative 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,

Deanne Glover
Vice President
Heffernan Insurance Brokers