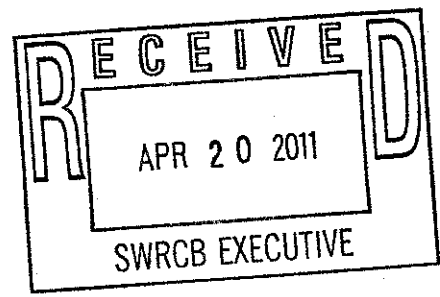


VICE CHAIR
GOVERNMENT ORGANIZATION
PUBLIC SAFETY

MEMBER
HEALTH
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BUDGET & FISCAL REVIEW

JOINT COMMITTEE
LEGISLATIVE AUDIT



April 20, 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 (Oppose)

Chairman Hoppin and Board Members:

I write in opposition to the California State Water Resources Control Board's proposed Industrial Storm Water Permit requirements.

While I have no doubt that the Board has acted with the best of intentions, these draft regulations contain provisions that would further burden California's already troubled economy despite the absence of evidence suggesting these regulations would have any positive impact on California's water supply.

Of particular concern is the reliance on arbitrary numeric limits. These regulations would impose tens of thousands of dollars in compliance costs on small businesses. For larger industrial facilities, the fees are almost certain to exceed the hundred-million dollar mark. Negative impacts will not be limited to private industry. Public entities such as cities and school districts will also be affected, leaving public officials with no choice but to further cut vital services.

The SWRCB is set to impose a duplicative regulatory scheme that exceeds the already stringent standards adopted by the United States Environmental Protection Agency. Before it does so, I urge the Board members to seriously consider the findings of its expert panel, which warned that more reliable data was necessary before the Board could justify imposing such onerous regulations on businesses and local government.

I share the Board's concern for our water supply, but California cannot afford more costly and unnecessary regulations on businesses and public agencies.

Sincerely,

Joel Anderson
Senator

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