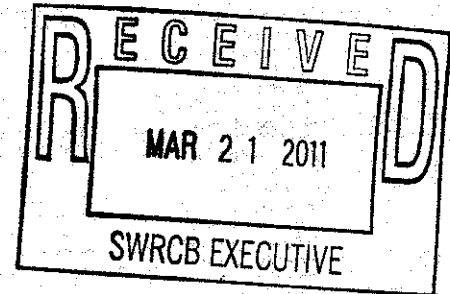


Roy E. Lay Trucking  
1218 E. Kentucky Ave.  
Woodland, Ca.

March 18, 2011

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



**Re: Comment Letter – Draft Industrial General Permit**

To Whom It May Concern:

These comments have been written on behalf of Roy E. Lay Trucking in Woodland, 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.

*Roy E. Lay Trucking would like the SWRCB to conduct a cost analysis or an Economic Impact Analysis of the proposed new permit. CTA is anticipating, at the very least, a 100% cost increase for businesses within the trucking industry. I also understand that 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 established.*

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,

Ed Brown

A handwritten signature in black ink that appears to read "Ed Brown".

Ed Brown

Roy E. Lay Trucking