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South County Economic Development Council

January 10, 2013

Mr. Wayne Chlu, P.E. Callfornia Regional Water Quality Control Board, San Diego Region 9174 Sky Park Ct Ste 100 San Diego, CA 92123-4340

Dear Mr. Chiu,

On January 8, 2013, The South County Economic Development Council (SCEDC) Board of Directors agreed to send you a letter volcing our concerns with the changes proposed to the Regional Water Quality Board's Stormwater permit. While our members noted the intent of the ordinance is admirable, the anticipated implementing of the ordinance was viewed as onerous and expensive and a detriment to economic development in South San Diego County.

The draft language of the permit includes new requirements for development. These new requirements will increase costs substantially on an already over-burdened business community. These costs are due to the measures that must be taken to comply with the new regulations. Additionally, the new liability for exceeding the water quality objectives will discourage investment in our region at a time when we should encourage businesses to invest and create more jobs. Furthermore, it was noted that many of the previous exemptions to the Stormwater regulations had been deleted in this new ordinance. The additional measures needed to comply with these regulations will make a project infeasible.

SCEDC would like to offer our services if the San Diego Regional Water Quality Control Board would like to create an implementation task force to discuss best practices and realistic methods to achieve your goals. If I may be of further assistance or provide additional information please feel free to contact me at (619)424-5143.

Sincerely,

Cindy Gompper Graves President & Chief Executive Officer

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