



naiop
National Association of
Industrial and Office Properties

The Forum for Commercial Real Estate

SoCal Chapter

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April 4, 2007

Submitted by Facsimile to (858) 571-6972

First Class Mail and E-Mail to: jhaas@waterboards.co.gov

California Regional Water Quality Control Board
San Diego Regional Board
9174 Sky Park Court, Suite 100
San Diego, California 92123-4353

**RE: ORANGE COUNTY MUNICIPAL STORM WATER PERMIT
TENTATIVE ORDER NO. R9-2007-0002**

Dear Members of the Board:

The SoCal Chapter of the National Association of Industrial and Office Properties (NAIOP SoCal) represents commercial real estate professionals and the owners and developers of industrial, office and commercial properties in Orange and Los Angeles Counties.

NAIOP SoCal is a member of the Coalition for Clean Water and a Healthy Economy that is on record raising objections to several sections of the San Diego County Permit adopted by the Board on January 24, 2007. To the extent the proposed Orange County MS4 Permit proposes those same objectionable changes, NAIOP SoCal is raising the same objections outlined by the Coalition for Clean Water and a Healthy Economy to the San Diego MS4 Permit, which include, but are not limited to:

- The shift of enforcement obligations from the Regional Board to the Permittees requiring inspection by the Permittees of industrial and commercial sites to determine if such sites have obtained coverage under the applicable NPDES permit.
- Requirements in the Order that exceed the federal MEP standard, including the control of runoff from all construction and industrial sites, additional inspection and MS4 cleaning requirements, and advanced treatment.
- Unfunded mandates that, as an example, require inspections of new classes of industrial and commercial facilities.

NAIOP SoCal agrees with the comments submitted by allied industry associations including the Building Industry Association of Orange County. As we continue to evaluate the impact of the proposed modifications, we anticipate submitting additional comments.

Sincerely,

Vickie Talley

Vickie Talley, Director of Government Affairs

File 10-6000.02

An alliance of Southern California chapters serving the commercial real estate community:
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