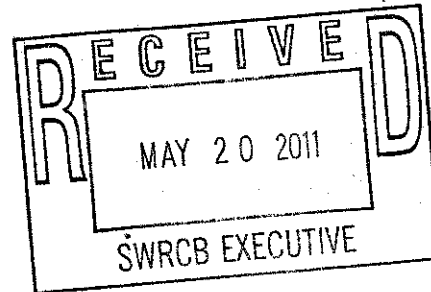


IRVINE COMPANY | **COMMUNITY DEVELOPMENT**
Since 1864

May 20, 2011



State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Attention: Jeanine Townsend

Re: Comment Letter – ASBS Special Protections

Dear Ms. Townsend:

In addition to the comments submitted under separate cover by Flow Science Incorporated, the Irvine Company is pleased to submit this letter regarding the *Draft General Exception to the California Ocean Plan Waste Discharge Prohibition for Selected Discharges into Areas of Special Biological Significance (ASBS), including Special Protections for Beneficial Uses and the Associated Program Environmental Impact Report.*

Like the Pelican Point Homeowners, it is our understanding that the City of Newport Beach may be submitting a letter to the State Water Board indicating that the City will act on behalf of the Irvine Company with regard to the ASBS exception. When this occurs, we will request the Agency to revise the Special Protection documents so that the Irvine Company is listed the same as Pelican Point Homeowners.

Please contact me at (949) 720-2878 if you have questions regarding this letter. Thank you for the opportunity to provide comments on the ASBS Special Protections.

Sincerely,

A handwritten signature in cursive script that reads "Dean S. Kirk".

Dean S. Kirk
Senior Director
Environmental Permitting & Compliance