ENVIRONMENTAL LAW FOUNDATION
1736 Franklin Street, 9th Floor, Oakland, California 94612 • (510) 208-4555 • Fax (510) 208-4562
www.envirolaw.org • envlaw@envirolaw.org

Thursday, August 30, 2018

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
PO Box 100
Sacramento, CA 95812-0100
commentletters@waterboards.ca.gov

Via Email

RE: Comments to A-2283(b)—September 4 Board Meeting

Dear Ms. Townsend,

The petitioners, Environmental Law Foundation and Asociación de Gente Unida por el Agua, submit the following comments in response to the State Water Resources Control Board's proposed order in this matter issued July 31, 2018.

Under the proposed order, the State Board would take this petition up on its own motion, giving the Board additional time to address the issues Petitioners raised.

Petitioners do not object to this procedure. We support a process that gives the Board and staff adequate time to address the serious deficiencies in the Central Valley Regional Water Quality Control Board's Waste Discharge Requirements Order No. R5-2013-0122.

Nonetheless, given that this Petition was filed five years ago, and that Order No. R5-2013-0122, in turn, was issued in response to an order from the Court of Appeal resulting from litigation that Petitioners filed in 2008, it is our hope that this proceeding will conclude as expeditiously as possible. We thus urge the State Board to move with all deliberate speed towards a conclusion of this Petition.

Sincerely,

Nathaniel Kane
Staff Attorney
Environmental Law Foundation