

May 26, 2026

Via Email: waterqualitypetitions@waterboards.ca.gov

State Water Resources Control Board
Office of Chief Counsel
P.O. Box 100
Sacramento, CA 95812-0100

**RE: PETITION OF COROMAR PROPERTIES, LLC FOR REVIEW OF WATER
CODE SECTION 13267 ORDER NO. R3-2026-0007 FOR 26 COROMAR DRIVE,
GOLETA, SANTA BARBARA COUNTY; ISSUED BY THE CENTRAL COAST
REGIONAL WATER QUALITY CONTROL BOARD**

REQUEST TO HOLD PETITION IN ABEYANCE

Dear Members of the State Water Resources Control Board:

Coromar Properties, LLC (“Coromar” or “Petitioner”), the property owner of the site located at 26 Coromar Drive, Goleta, Santa Barbara County (“Site”), hereby submits this Petition for Review pursuant to Water Code section 13320 and California Code of Regulations, title 23, section 2050, seeking review of Water Code Section 13267 Order No. R3-2026-0007 (“Order”) issued by the Central Coast Regional Water Quality Control Board (“Regional Board”).

Coromar further requests that the State Water Resources Control Board (“State Water Board”) hold this petition in abeyance pursuant to California Code of Regulations, title 23, section 2050.5, in hopes that the matter may be resolved between the parties and the Regional Board.

I. BACKGROUND

On or about February 2026, the Regional Board issued Order No. R3-2026-0007 pursuant to Water Code section 13267, directing certain parties—including Coromar Properties, LLC—to undertake investigation and remediation activities at the Site. The Order requires the named parties to conduct assessment, monitoring, and/or cleanup activities related to contamination at 26 Coromar Drive, Goleta, California.

Coromar Properties, LLC is the current property owner of the Site. Coromar did not cause or contribute to the contamination that is the subject of the Order. The contamination at the Site is attributable to the operations of current and former tenants and operators, including but not limited to Heidenhain Corporation and Renco Encoders, Inc., whose industrial activities generated the contaminants that are now the subject of regulatory concern.

II. GROUNDS FOR PETITION

Coromar respectfully submits that the Order is inappropriate as applied to Coromar Properties, LLC for the following reasons:

- A. Inequitable Allocation of Responsibility.** The Order imposes investigation and abatement obligations on Coromar as the property owner, despite the fact that Coromar

did not cause or contribute to the contamination. The parties primarily responsible for the contamination—including Heidenhain Corporation—have petitioned the State Water Board to hold their obligations in abeyance (SWRCB/OCC File A-2935). If Heidenhain’s obligations are held in abeyance while Coromar’s are not, Coromar will be left as the sole party bearing the financial and operational burden of remediation activities that should properly be shared among or borne by the responsible parties who caused the contamination.

- B. **Due Process and Fairness Concerns.** Allowing the party that caused the contamination to defer its obligations while requiring the innocent property owner to proceed with costly abatement activities is fundamentally inequitable. Coromar should not be compelled to undertake remediation alone when the responsible parties’ obligations have been suspended.
- C. **Consistency and Coordination.** Holding this petition in abeyance on a parallel timeline with the Heidenhain petition (File A-2935) will promote consistency, avoid duplicative proceedings, and allow all parties the opportunity to work toward a coordinated resolution with the Regional Board.

III. ACTION REQUESTED

Coromar Properties, LLC respectfully requests that the State Water Board:

- 1. Accept this Petition for Review of Order No. R3-2026-0007;
- 2. Hold this petition in abeyance until March 5, 2028, consistent with the abeyance period granted to Heidenhain Corporation in SWRCB/OCC File A-2935, so that the matter may be worked out between the parties and the Regional Board; and
- 3. Ensure that Coromar Properties, LLC is not left as the sole party bearing remediation obligations while the parties who caused the contamination have their obligations deferred.

IV. TIMELINESS

This petition is filed within 30 days of Petitioner becoming aware of the State Water Board’s approval of Heidenhain Corporation’s request for abeyance (acknowledged April 22, 2026), and how it does not include Coromar, which materially changes the circumstances under which the Order will be implemented as to Coromar. Coromar submits that this petition is timely under the circumstances, and respectfully requests the State Water Board’s consideration.

V. CONTACT INFORMATION

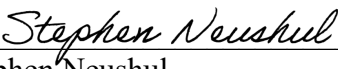
All correspondence regarding this petition should be directed to:

Stephen Neushul
Coromar Properties, LLC
26 Coromar Drive
Goleta, CA 93117
sneushul@icrocompany.com

A copy of this petition has been served on the Central Coast Regional Water Quality Control Board and the other parties to SWRCB/OCC File A-2935, as required.

Thank you for your prompt attention to this matter. Coromar Properties, LLC reserves all rights and remedies available under law.

Respectfully submitted,



Stephen Neushul
Coromar Properties, LLC
26 Coromar Drive
Goleta, CA 93117

cc:

Ryan Lodge, Executive Officer, Central Coast Regional Water Quality Control Board
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