



## California Sportfishing Protection Alliance

*"An Advocate for Fisheries, Habitat and Water Quality"*

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14 September 2012

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 "I" Street, 24<sup>th</sup> Floor  
P.O. Box 100  
Sacramento, CA 95814  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



VIA: Electronic Submission  
Hardcopy if Requested

RE: **Comments to SWRCB/OCC File A-2209 (a)-(e) – September 19, 2012 Board Meeting**

Dear Ms Townsend and Members of the State Board:

Pursuant to the State Water Resources Control Board's September 10, 2012 notice, the California Sportfishing Protection Alliance (CSPA) appreciates the chance to comment on the Draft Stay Order SWRCB/OCC FILES A-2209 (a) - (e) (Stay of Order No. R3-2012-0011).

We believe that the draft order is not in the public interest and violates the Porter Cologne Act for the reasons explained more thoroughly in the letter submitted by Petitioners Monterey Coastkeeper, San Luis Obispo Coastkeeper, and Santa Barbara Channelkeeper (collectively "Environmental Petitioners") and incorporate each of their comments on the draft order as our own. In particular, we are concerned that delay in the implementation of the 2012 Conditional Waiver will contribute to the continued worsening of water quality, negatively impacting human health and the environment.

CSPA is presently litigating the Central Valley Regional Water Quality Control Board's 2011 renewal of the Conditional Waiver of Waste Discharge Requirements for Discharges From Irrigated Lands and the Program Environmental Impact Report for the Long-Term Irrigated Lands Regulatory Program. While the Central Coast Conditional Waiver is a significant, meaningful improvement over the Central Valley Waiver, we believe it is still deficient and not in accord with explicit requirements of Porter-Cologne. That said; the State Board's proposed stay of essential requirements in the Central Coast Waiver that would lead to substantial improvements in water quality protection is perplexing.

Documented water pollution problems are severe in the Central Coast region. The 2012 Central Coast Waiver represents a positive step toward establishing an effective regulatory program capable of addressing the pervasive and systemic problems of pollution from irrigated lands.

The State Board's proposed stay diminishes hope that regulatory bodies might finally begin to enforce the law and take steps to ensure that the environment can coexist with a sustainable agricultural industry in a manner that minimizes and mitigates known harms.

We are disappointed that after four years of work, with considerable public involvement, the State Board would delay implementation now. We join with the Environmental Petitioners to ask that you deny the stay request and allow the Regional Board to press forward with the reasonable and measured steps set forth in the Conditional Waiver.

Thank you for considering these comments. If you have questions or require clarification, please don't hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Jennings". The signature is fluid and cursive, with the first name "Bill" and last name "Jennings" clearly distinguishable.

Bill Jennings, Executive Director  
California Sportfishing Protection Alliance