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September 14, 2012 Sent via email to: commentletters@waterboards.ca.gov

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100



Re: Proposed Stay Order SWRCB/OCC FILES A-2209 (a) - (e)

I would like to see the day when my children and others can safely play in the creeks that pass near our home. I would like to see the day when all persons, regardless of income or race, have access to safe drinking water in their homes. I would like to see the day when the Bay is clean for otter and fish alike. Unfortunately, the arrival of that day will be needlessly and wrongly delayed if the State Water Resources Control Board's stay of the CEWQCB's Conditional Waiver order stands.

Pursuant to the State Water Resources Control Board's September 10, 2012 notice, California Rural Legal Assistance, Inc. (CRLA) submits this written response opposing the Draft Stay Order SWRCB/OCC FILES A-2209 (a) - (e) (Stay of Order No. R3-2012-0011).

CRLA provides free legal assistance to low-income residents of rural areas in California, including in Monterey, Santa Barbara, San Luis Obispo and Santa Cruz counties. Among other issues, we assist residents and communities that have limited or no access to safe drinking water in their homes and communities.

We believe that the draft stay 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"). In particular, we are concerned that delay in the implementation of the 2012 Conditional Waiver will contribute to the continued worsening of water quality in our communities, negatively impacting human health and the environment.

Water pollution problems are severe in the Central Coast region. The 2012 Conditional Waiver is the first glimmer of hope we have had in decades that regulatory bodies might begin to enforce the law and address the problem, and take steps to ensure that our communities can continue to develop and sustain an agricultural industry in a manner that minimizes and mitigates known harms to our children and wildlife.

We are disappointed that after four years of work, with multiple opportunities for 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.

Sincerely,

CALIFORNIA RURAL LEGAL ASSISTANCE, INC.

Michael I. Marsh
Michael I. Marsh
Directing Attorney