

October 13, 2014

Via email

felicia.marcus@waterboards.ca.gov

thomas.howard@waterboards.ca.gov

Felicia Marcus, Chair
Thomas Howard, Executive Director
State Water Resources Control Board
1001 I Street
Sacramento, CA 95812

RE: ACL Complaint R7-2014-0041, National Beef California, LP

Dear Ms. Marcus and Mr. Thomas:

On behalf of the undersigned organizations, we urge the State Water Resources Control Board to prosecute the referenced National Beef administrative civil liability complaint under Water Code Sections 183, 13320 and other applicable laws as the Colorado River Basin Regional Board has requested. We believe that National Beef and other slaughterhouses and animal feeding operations in Imperial County must comply with required pretreatment regulations. We are extremely concerned that National Beef's serious, repeated violations may fall through the cracks, unpunished. The State Board must not let that happen – it should prosecute the referenced National Beef administrative civil liability complaint.

We want to emphasize that the Colorado River Basin and its residents merit robust attention and resources when it comes to protection of water quality. It applauds the Colorado River Basin Regional Board and its staff's efforts to make enforcement a priority within the Colorado River Basin.

We also want the State Water Resources Control Board to understand that it is extremely important that any administrative civil liability penalties or supplemental environmental projects be directed to local efforts within Imperial County and the Colorado River Basin, whether it be the New River, Salton Sea restoration, or other meritorious local projects. We appreciate the role of the State Water Resources Control Board's Cleanup and Abatement Account, but it is concerned when penalty funds go into a general account in Sacramento that cannot always be accessed locally where the violations occur. Please keep local projects in mind with regard to the National Beef and other administrative civil liability complaints. These funds can do great good if wisely spent within Imperial County and the Colorado River Basin.

Again, we appreciate the notice provided to it with regard to the National Beef administrative civil liability complaint. We will be monitoring this matter with special interest, and we are available to the State Water Resources Control Board and its staff at any time, particularly to support local water quality enforcement and improvement efforts within Imperial County and the Colorado River Basin. Please do not let enforcement in the region fall through the cracks. The State Water Resources Control Board must prosecute the referenced National Beef administrative civil liability complaint under Water Code Sections 183, 13320 and other applicable laws and regulations.

Sincerely,

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Drew Wood
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Ricardo Pulido
Executive Director
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Cc via email:

Frances Spivy-Weber, Vice- Chair State Water Resources Control Board
Steven Moore, State Water Resources Control Board
Tam Duduc, State Water Resources Control Board
Dorene D'Adamo, State Water Resources Control Board
Lori Okun, State Water Resources Control Board
Jose Angel, Colorado River Basin RWQCB
Anna Kathryn Benedict, State Water Resources Control Board
Tom Vandenberg, State Water Resources Control Board