



## SAN JERARDO COOPERATIVE, INC.

September 14, 2012

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  
Via email to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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

Dear Ms. Townsend,

Pursuant to the State Water Resources Control Board's September 10, 2012 notice, Clean Water Action, California Rural Legal Assistance Foundation Community Water Center, the Environmental Justice Coalition for Water and the San Jerardo Cooperative, Inc. submit this written response opposing the Draft Stay Order SWRCB/OCC FILES A-2209 (a) - (e) (Stay of Order No. R3-2012-0011). [possibly insert brief description of organization and its interest]

While we appreciate the decision not to stay the groundwater monitoring requirements of the Central Coast Order, our organizations are deeply concerned by the recommendations to stay many of the other critical parts of the order. 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. The language on paged 18 & 19 of the draft stay order is particularly concerning, The assertion that "Nitrogen impacts on groundwater from fertilizer application generally take years to accumulate to such a level as to impact a drinking water supply" ignores the current degraded state of much of the groundwater supply in the region, as well as the fact that a large percentage of rural residents rely upon domestic wells, which access relatively shallow groundwater

sources that are more readily impacted by surface discharges. Continued delay in implementing an effective, enforceable program *will* impact drinking water supplies.

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 severe water quality problems in the region, 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,



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