



Thomas D. Gentner
Director
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State Water Resources Control Board
P.O. Box 100
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RE: Comments in Support of Proposed Amendments to CCR, Title 23, Division 3, Chapter 6: Rules Governing Review by State Water Resources Control Board of Action or Failure to Act by Regional Boards

Dear Sir:

As one of the world's leading suppliers to the aerospace and defense industries, Rockwell Collins conducts business at several locations in California. As such, we have had matters before regional water quality control boards in California and write this letter to express our strong support for the State Board's proposed amendments to California Code of Regulations, Title 23, Division 3, Chapter 6 concerning the rules governing review by the State Board of action or failure to act by Regional Boards. ("Proposed Amendments").

As the Policy Statement Overview which accompanies the Proposed Amendments states, certainty in any regulatory process is important, and this is no less the case for the specific subject of the Proposed Amendments: eliminating the current uncertainty that a company which seeks State Board Review of regional board action, or inaction, encounters when trying to guess whether the State Board itself will act on its Petition for Review, and, if so, when.

We congratulate the State Board for proposing a very simple and common sense solution: establishing an explicit period of time for the State Board to act, and providing that if it does not, a petitioning party will then be able to weigh further options, including proceeding to seek judicial review before a California Superior Court if necessary.

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Page 2 of 2

As things presently exist, neither parties working with regional boards, nor the regional boards themselves, knows with any certainty whether and when review by the State Board of any disagreements will ever actually be available.

The Proposed Amendments eliminate that doubt, establishing a certain timeline for completing the administrative review process before the State Board. Rockwell Collins believes this certainty will benefit everyone and agrees with the State Board's analysis that adoption of the Proposed Amendments "will have a positive effect on the health and welfare of California residents."

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Thomas D. Gentner".

Thomas D. Gentner, P.E.
Rockwell Collins Inc.

TDG/tg