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April 19, 2017

Via email to:

Eric Lindberg
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3348
eric.lindberg@waterboards.ca.gov

Re: CWAD (order R8-2016-003) Proposed Compliance Schedule Extension

Dear Mr. Lindberg

Orange County Coastkeeper (“Coastkeeper”) is a nonprofit clean water organization with the mission to protect and promote sustainable water resources that are swimmable, drinkable, fishable and sustainable. After reviewing the Notice of proposed extension of the compliance schedule for the CWAD ORDER NO. R8-2016-0003), we have the following comments:

1. Coastkeeper was actively involved in a stakeholder process to develop the CWAD that lasted seven years. All of the parties subject to the order were well aware of its requirements and schedule. To extend the deadline for enrollment now just rewards inaction on the part of the covered parties. **Comment 1**
2. The compliance schedule should not be altered to delay the creation and implementation of agricultural nutrient management plans. Waiting until 90 days after the undetermined date that the Regional Board issues a NOA, or within six months of the submittal of draft recommendations for the revision of the Lake Elsinore/Canyon Lake TMDLs delays needed water quality improvements. Until modified, the existing nutrient TMDLs are still in force and the existing deadline in the order provides adequate time to develop a plan to meet the requirements of the TMDLs **Comment 2**
3. Extending time for individual discharger enrollment in a Coalition Group(s) to January 28, 2018 is unnecessary. Enrollment in a coalition is just one option and exceptions to the compliance schedule should not be made to facilitate that outcome. **Comment 3**

Thank you for your consideration of our views.

Regards,

A handwritten signature in black ink that reads "Raymond F. Hiemstra".

Raymond Hiemstra
Associate Director
Orange County Coastkeeper