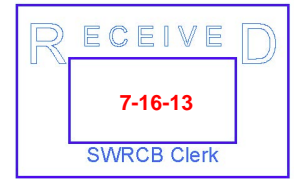




State Water Resources Control Board

July 16, 2013



Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
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P.O. Box 100  
Sacramento, California 95812-0100  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**RE: COMBINED COMMENTS TO RODEO OWNER CORPORATION, LUBRICATING SPECIALTIES COMPANY, LINCOLN AVENUE WATER COMPANY, AND MANTINI MANAGEMENT, INC. PROPOSED ORDERS – JULY 23 BOARD MEETING**


Honorable Members of the State Water Resources Control Board:

The State Water Resources Control Board's (State Water Board) Office of Enforcement submits this combined comment letter for the four (4) Proposed Orders Imposing Mandatory Minimum Penalties against the above-mentioned Permittees. Counsel from the Office of Enforcement represented the State Water Board Prosecution Team in all four adjudicatory proceedings that occurred on November 18, 2010, and October 19, 2011, in Los Angeles before Hearing Officer Frances Spivy-Weber.

The Office of Enforcement, on behalf of the State Water Board Prosecution Team, supports each of the four (4) Proposed Orders Imposing Mandatory Minimum Penalties and recommends adoption of the Orders as drafted at the July 23, 2013 Board Meeting.

The Office of Enforcement and State Water Board Prosecution Team appreciate the State Water Board's consideration of these matters.

Sincerely,



Christian M. Carrigan, Director  
**Office of Enforcement**  
On behalf of the Prosecution Team