



California Council for Environmental and Economic Balance

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April 30, 2014

Mr. Tim Regan
Office of Chief Counsel
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812

Via email

RE: Proposal to Amend Title 23 of the California Code of Regulations regarding Petitions to Challenge the Action or Inaction of Regional Boards

Dear Mr. Regan:

The California Council for Environmental and Economic Balance (CCEEB) is a non-partisan, non-profit coalition of business, labor, and public leaders that advances strategies for a strong economy and a healthy environment. CCEEB has reviewed your proposal to amend Sections 2050, 2050.5 and 2051 of Title 23 relating to Petitions regarding Regional Boards' actions.

CCEEB believes strongly that a petitioner's due process rights are denied when the State Board is unable to act on petitions in a timely manner. We also agree with other commenters that Section 2053 pertaining to stays also be addressed within the scope of the proposed changes. Without such a change, the problem of State Board action would likely persist for stay requests even if it is remedied for petitions.

Thank you for the opportunity to comment on this important Board proposal. CCEEB welcomes the opportunity to work with staff to develop the appropriate regulatory language. If you would like additional information or if you have questions, please contact Robert Lucas at 916-444-7337.

Sincerely,

Robert W. Lucas
Water, Waste & Chemistry Project Manager

Jerry Secundy
President

cc: Chair and Members of SWRCB
Matthew Rodriquez, Secretary California Environmental Protection Agency
Gordon Burns, Undersecretary, California Environmental Protection Agency
Jackson Gualco, The Gualco Group, Inc.