



Dedicated to advancing the interests of the business community through advocacy, leadership, and representation



September 12, 2014

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Post Office Box 100
Sacramento, CA 92814
Via E Mail: commentletters@waterboard.ca.gov

Re: Comments on A-2259; - September 23, 2014 Board Meeting. Petition of Foothill/Eastern Transportation Corridor Agency -- Waste Discharge Requirements Tentative Order No. R-9-2013-0007 – Tesoro Extension Project – State Route 241

Dear Ms. Townsend:

The South Orange County Economic Coalition is a membership driven organization representing business community throughout ten cities and three unincorporated areas in the South County region. Our organization's mission and focus is to support key infrastructure projects relating to energy, transportation and water. South Orange County is home to a growing population as the region is not built out. As our population grows and communities expand, our infrastructure needs to be enhanced in order to sustain this growth.

The proposed Tentative Order from the State Water Resources Control Board to the San Diego Regional Water Quality Control Board will expand the power and authority of Regional Boards to speculate on the impacts of "potential" future phases of projects. The enactment of this order will likely result in a delay and possible denial of beneficial infrastructure projects that provide jobs and improved quality of life for not only South Orange County residents and businesses but for all Californians. That's why many agencies and organizations in the transportation and water arena throughout California have voiced their concern.

Further, your Draft Order would require these agencies to provide you early on as to what may or may not occur in future phases of infrastructure projects. This simply shouldn't be allowed as it is not feasible.

There are currently many infrastructure projects underway in the South Orange County region. Many of these projects are built phases or based on need or available funding. Requiring water discharge requirements (WDRs) for potential future phases or projects is unreasonable.

Just as the applicant is not permitted to build beyond the scope of an approved project, regulatory agencies should also not be permitted to render judgments on potential future projects that have not been analyzed or even proposed.



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We are requesting that the State Board modify the Staff Report to make it clear that Regional Boards should limit their review of proposed WDRs and water quality certifications to the scope of the proposed project in the application and discharge proposed by the applicant.

Sincerely,

A handwritten signature in blue ink that reads "Duane D. Cave". The signature is fluid and cursive, with the first name "Duane" being the most prominent.

Duane D. Cave
Chairman
South Orange County Economic Coalition