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August 30, 2018

Via Electronic Mail Only

Jeannine Townsend Clerk to the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA commentletters@waterboards.ca.gov

Re: Comments on A-2283(b)—September 4 Board Meeting

Dear Ms. Townsend:

This firm represents Dairy Cares, a non-profit coalition formed by dairy farming cooperatives and other dairy-industry businesses to ensure the long-term sustainability of California's dairy farming families. As the "Community Alliance for Responsible Environmental Stewardship," Dairy Cares participated in the litigation that challenged the 2007 general waste discharge requirements for milk cow dairies. On February 2, 2018, Dairy Cares filed a response to Environmental Law Foundation's and Asociacion de Gente Unida por el Agua's Petition for Review of the Central Valley Regional Water Quality Control Board's Reissued Waste Discharge Requirements General Order for Existing Milk Cow Dairies, Order No. R5-2013-0122 (2013 General Order), SWRCB/OCC File No. A-2283(b).

Dairy Cares supports the State Water Resources Control Board's (State Board) decision to take up review of the 2013 General Order on its own motion, as set forth in the State Board's proposed order. This will allow the State Board sufficient time to consider the sufficiency of the 2013 General Order.

Very truly yours,

Theresa A. Dunham

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## PROOF OF SERVICE

I am employed in the County of Sacramento; my business address is 500 Capitol Mall, Suite 1000, Sacramento, California; I am over the age of 18 years and not a party to the foregoing action.

On August 30, 2018, I served the foregoing Comments on A-2283(b)—September 4 Board Meeting via electronic service to the e-mail addresses set forth below:

Debi Ores, Esq. Community Water Center deborah.ores@communitywatercenter.org

Nathaniel Kane, Esq. Environmental Law Foundation nkane@envirolaw.org

Lynne Saxton, Esq. Saxton & Associates lynne@saxtonlegal.com

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Susana De Anda, Coordinator Asociación de Gente Unida por el Agua susana.deanda@communitywatercenter.org

Emel Wadhwani, Esq. State Water Resources Control Board emel.wadhwani@waterboards.ca.gov

Jessica M. Jahr, Esq. State Water Resources Control Board jessica.jahr@waterboards.ca.gov Patrick E. Pulupa, Executive Officer Central Valley Regional Water Quality Control Board patrick.pulupa@waterboards.ca.gov

Clay Rodgers, Assistant Executive Officer Central Valley Regional Water Quality Control Board clay.rodgers@waterboards.ca.gov

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Philip Wyels, Esq. State Water Resources Control Board philip.wyels@waterboards.ca.gov

David W. Smith, Chief U.S. EPA Permits Office smith.davidw@epa.gov

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David Lancaster, Esq. State Water Resources Control Board david.lancaster@waterboards.ca.gov Ken Greenberg, Chief U.S. EPA Region 9 greenberg.ken@epa.gov

Bayley Toft-Dupuy State Water Resources Control Board bayley.toft-dupuy@waterboards.ca.gov

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 30, 2018, at Sacramento, California.

Jennifer Estabrook