

Los Angeles Regional Water Quality Control Board

December 7, 2015

VIA EMAIL ONLY

Ryan Mallory-Jones
Office of Chief Counsel
State Water Resources Control Board
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**PETITION OF NATURAL RESOURCES DEFENSE COUNCIL, HEAL THE BAY, AND LOS ANGELES WATERKEEPER FOR REVIEW OF APPROVAL OF WATERSHED MANAGEMENT PROGRAMS PURSUANT TO THE LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD ORDER R4-2012-0175: LOS ANGELES WATER BOARD REQUEST FOR ONE WEEK EXTENSION OF TIME TO SUBMIT ADMINISTRATIVE RECORD
SWRCB/OCC FILE A-2386**

Dear Mr. Mallory-Jones:

The Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) received your letter dated November 10, 2015, whereby the State Water Resources Control Board (State Water Board) requested that the Los Angeles Water Board submit the administrative record in this matter and provided an opportunity for the Los Angeles Water Board and other interested persons to submit responses to the Natural Resources Defense Council, Heal the Bay, and Los Angeles Waterkeeper's (collectively, Petitioners) petition, filed May 28, 2015, and to a petition addendum, filed October 30, 2015. On November 20, 2015, the Los Angeles Water Board requested and was granted an extension of time, until 5:00 pm on January 15, 2016, to submit the Los Angeles Water Board's response to the petition. At that time, the Los Angeles Water Board did not request an extension of time to submit the administrative record and intended to submit the record by December 10, 2015. For the reasons stated in that letter and for these additional reasons, the Los Angeles Water Board requests a one-week extension of time, until 5:00 pm on December 17, 2015, to submit the administrative record:

- As noted in the Los Angeles Water Board's November 20, 2015 request, the administrative record for this matter is large. In developing the administrative record index for this matter, however, we have realized that the record contains more documents than we first contemplated. As previously noted, the Los Angeles Water Board is again preparing the entire record in electronic format, which requires significant staff time to assure the record is prepared in an organized way that will be helpful to the State Water Board in its review and to assure that it is complete, as well as time required to be spent on technical factors - such as converting documents to PDF format, the need to reduce the size of the PDF files to meet the processing capacity of the conversion software, the process of merging the

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individual PDF files into one file by record section, and Bates numbering each section of the record sequentially, and the process of creating the corresponding administrative record index with the Bates numbering for each document to facilitate navigating the record.

- The Los Angeles Water Board staff and attorney working on this matter have had limited availability to work on preparing the administrative record since receiving the State Water Board's letter on November 10, 2015. Three state holidays (November 11 and November 26-27) fall on business days within this timeframe and many staff had pre-planned vacations during Thanksgiving week. The Los Angeles Water Board has been diligently working on preparing the administrative record since receiving the State Water Board's letter on November 10, 2015. However, despite best efforts, it has become apparent that the time lost due to the three state holidays and Thanksgiving week vacations is necessary to complete preparation of the record.

Given these additional reasons, the Los Angeles Water Board respectfully requests that the State Water Board grant the Los Angeles Water Board's request for a one-week extension of time, until 5:00 pm on December 17, 2015, to submit the administrative record for this matter. In the event the Los Angeles Water Board can submit the administrative record prior to that date, the Board will submit it sooner.

Thank you for your consideration of this request. If you have any questions, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Samuel Unger for".

Samuel Unger, PE
Executive Officer

cc: Attachment A (Permittee List)

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