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June 20, 2007

VIA FACSIMILE AND U.S. MAIL

Deborah J. Smith  
Interim Executive Officer  
California Regional Water Quality Control Board  
for the Los Angeles Region  
320 West Fourth Street, Suite 200  
Los Angeles, California 90013

RECEIVED  
2007 JUN 21 PM 2 01  
CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

Re: **Proposed Reopening of the County of Los Angeles  
Municipal Storm Water Discharge Permit (National  
Pollutant Discharge Elimination System Permit No.  
CAS004001)**

Dear Ms. Smith:

This office represents the County of Los Angeles and the Los Angeles County Flood Control District (collectively, the "County"). Pursuant to the public notice dated May 11, 2007, this letter is to set forth the objections and concerns of the County to the announced procedures for the hearing on the proposed reopening of the County of Los Angeles Municipal Separate Storm Sewer System Permit.

Please be advised that the County does not waive its right to an adjudicatory hearing in accordance with all applicable statutory and regulatory provisions, including but not limited to Water Code section 13263, Government Code section 11400 et seq., Government Code section 11513, and 23 Cal. Code Reg. § 648 et seq. The County intends to exercise its right to opening and closing statements, presentation of evidence, and examination and cross-examination of witnesses.

The County also has the following specific comments on or objections to the announced procedures:

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1. Interested Parties. The County has no objection to the proposal to place a time limit on testimony by interested parties. The County does not understand this to be a limit on the presentation by the designated parties to the hearing. The County would object to any limitation placed on any presentation to be made by any entity listed as a party in the May 11, 2007, notice.

2. Cross-examination. The County will present its evidence through witness statements and presentations, rather than through a question and answer examination of its witnesses. The County, however, reserves its right to fully cross-examine all witnesses presented by the staff or any party.

3. Non-presentation of Evidence / Administrative Record. The County objects to reliance on or the inclusion in the administrative record of any document not specifically brought to the attention of the Regional Board at the hearing. In that the Regional Board members must make findings of fact and render a decision based on the evidence before them, and that the County has the right to respond to any evidence introduced or relied upon, the documents on which the Regional Board will rely must be presented for review to the Board members at the hearing itself.

The County also objects to inclusion of the administrative records for Regional Board Order No. 01-182 and Resolution Nos. R4-2006-0074 and 2003-012 simply by their reference in the May 11 notice. These administrative records are voluminous and Regional Board members cannot be deemed to know or be aware of the contents of those records. If Regional Board staff intends to rely on or incorporate any document from those administrative records, the document should be specifically identified for the members of the Regional Board and the public, and a copy of that document should be made available for inspection by the public prior to the hearing.

4. Requests for Documents Not Included in the Agenda Package. The County objects to the requirement that a request for staff to bring to the hearing a document not included in the agenda package be submitted not less than five business days before the hearing. The agenda package is not currently prepared and therefore neither the public nor the County presently know whether a particular document is going to be included in the agenda package. Additionally, when the agenda package is prepared, the package will not be readily available to the public, including the County. Thus, a cut-off of no later than five business days before the hearing does not give the public or the County adequate time in which to make requests that staff bring documents to the hearing.



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5. Procedural Objections. The County objects to the proposal not to entertain procedural objections at the hearing. Objections must be made at the hearing so that they are included in the record. Moreover, 23 Cal. Code § 648.5(b) provides that "procedural motions by any party shall be in order at any time."

6. Time. The County and the Flood Control District must have appropriate time to prepare witnesses and evidence to respond to the presentation made by Regional Board staff. The procedure followed with respect to this permit, providing notice on May 11, 2007, but not identifying witnesses, and proposing not to issue written responses to comments until days before the hearing (assuming that comments will be provided), does not give the County adequate time to prepare and present its evidence.

Thank you for your attention to this matter.

Very truly yours,



Howard Gest



DONALD L. WOLFE, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

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IN REPLY PLEASE  
REFER TO FILE: WM-9

June 25, 2007

Ms. Deborah Smith  
Interim Executive Officer  
California Regional Water Quality  
Control Board – Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013-2343

Attention Rebecca Christmann

Dear Ms. Smith:

### COMMENTS ON THE PROPOSED REOPENING OF THE COUNTY OF LOS ANGELES MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT (NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT CAS004001)

We submit these comments on behalf of the County of Los Angeles and the Los Angeles County Flood Control District (collectively, the County). The County welcomes the opportunity to provide these comments as one of the agencies leading the efforts to improve water quality in Marina del Rey Harbor Back Basins, Mothers' Beach, and other locations throughout the County. In the spirit of partnership and for reasons described below, we urge the California Regional Water Quality Control Board (Regional Board) to enforce the Marina del Rey Harbor Bacteria (MDR Bacteria) Total Maximum Daily Load (TMDL) using an iterative, Best Management Practice (BMP)-based process, instead of as not to be exceeded numeric limits. For this reason, the Regional Board should not amend the Los Angeles County Municipal Storm Water Permit (the Permit) at this time. Alternatively, if the Regional Board is going to go forward, the more productive approach is to amend the permit to reflect the implementation plan submitted by the responsible jurisdictions, not numeric limits.

I. **The County's Commitment to meeting water quality standards for bacteria in Marina del Rey.**

The County is committed to meeting water quality standards for bacteria in Marina del Rey and throughout the County. Since adoption of the MDR Bacteria TMDL in 2003, the County has funded or participated in the following activities, amongst others:

- Marina Beach Water Quality Improvement Project, Phase I.
- Mothers' Beach and Back Basins Bacteria TMDL Nonpoint Source Study.
- Marina del Rey Harbor Mothers' Beach and Back Basins Report of Small Drain Identification.
- Marina del Rey Vessel Discharge Report.
- Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL Coordinated Monitoring Plan.
- Marina del Rey Harbor Mothers' Beach and Back Basins Toxics TMDL Coordinated Monitoring Plan.
- Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL Wet-Weather Quantification Analysis.
- Marina Beach Water Quality Improvement Project, Phase II.
- Two low-flow diversion projects.
- Implementation of the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL Coordinated Monitoring Plan.

These projects represent completed projects. Additional studies and projects are scheduled for the future. All of these efforts have been taken in consultation with the Executive Officer and Regional Board staff, who have been kept apprised of these projects' timetables, progress, and any roadblocks when they have been encountered. The total cost of these projects has been in excess of \$4.5 million.

**II. The proposed amendment to the permit is neither necessary nor appropriate.**

Given the current efforts of the County and the other responsible jurisdictions and agencies, the proposed amendment to the Permit is neither necessary nor appropriate. Rather than furthering the goals of the TMDL, the proposed amendment could have the unintended consequence of diverting resources from ongoing efforts.

- A. The County has submitted an implementation plan describing its approach to achieve compliance.

On January 8, 2007, the County submitted to the Regional Board an implementation plan describing the strategy by which we intend to use to comply with the MDR Bacteria TMDL. This implementation plan is the culmination of a collaborative process with both Regional Board staff and representatives from Heal the Bay and Santa Monica BayKeeper. The proposed compliance strategy takes into consideration the likelihood of success as well as cost-effectiveness. Addressing the summer dry-weather impairments, the plan includes the following:

- Low-Flow Storm Drain Diversion Program.
- Mothers' Beach Water Quality Improvement Project (Increase Basin D Circulation).
- Marina Source Identification and Control Program.

As set forth above, two out of the three low-flow diversion projects are complete as of December 2006, with the third scheduled for completion in 2008. The Basin D Circulation project was completed in October 2006. Additional programs proposed in the implementation plan continue to be implemented while existing programs are continually evaluated to assess effectiveness.

The goal of achieving bacteria water quality objectives should be achieved through the iterative process, as is the case for achieving every other water quality objective. If the Regional Board is going to amend the Permit, it should do so by incorporating the appropriate BMPs in the implementation plan, not numeric limits. This approach is consistent with the Environmental Protection Agency (EPA) guidance on the subject and assurances that the Regional Board staff has previously given as to the manner in which the TMDLs will be incorporated into the Permit.



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The EPA has adopted specific guidance on the incorporation of the TMDLs into stormwater permits. On November 22, 2002, the EPA issued a memorandum entitled, "Establishing Total Maximum Daily Load (TMDL) Wasteload Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs." In that memorandum, the EPA directly rejected placing numeric limits based on TMDLs in storm water permits, except in rare circumstances, recognizing that numeric limits are neither feasible nor appropriate given the variability of storm water runoff and the current lack of knowledge as to sources of pollutants and effective treatment for those pollutants. The EPA said:

[I]n light of 33 U.S.C. Section 1342(p)(3)(B)(iii), EPA recommends that for NPDES-regulated municipal and small construction storm water discharges effluent limits should be expressed as best management practices (BMPs) or other similar requirements, rather than as numeric effluent limits . . . .

EPA's policy recognizes that because storm water discharges are due to storm events that are highly variable in frequency and duration and are not easily characterized, only in rare cases will it be feasible or appropriate to establish numeric limits for municipal and small construction storm water discharges. The variability in the system and minimal data generally available make it difficult to determine with precision or certainty actual and projected loadings for individual dischargers or groups of dischargers. Therefore, EPA believes that in these situations, permit limits typically can be expressed as BMPs, and that numeric limits will be used only in rare instances.

The EPA November 22, 2002, Memorandum at page 4. EPA further suggested that permits contain a monitoring program to assure compliance with the TMDL's limitations and reaffirmed the appropriateness of an iterative, adaptive BMP management approach. *Id.* At 5.

County staff has been working closely with Regional Board staff in developing implementation plans for several of the TMDLs that have been adopted. During this process, the County has been repeatedly assured that it was the Regional Board's intent to follow this EPA guidance with implementing these TMDLs through the Permit. There is nothing about the MDR Bacteria TMDL or the Permit that makes it a rare circumstance. Instead, given the variability in the system and the minimal data available as to the sources of bacteria in the Marina, this TMDL falls squarely within the EPA guidance.

Inclusion of numeric limits is also directly contrary to the recommendations of the panel of experts convened by the State Water Resources Control Board. In its report, *The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities* (June 2006), on page 8, the panel specifically concluded that it is not feasible at this time to set enforceable numeric effluent criteria for municipal BMPs and in particular urban discharges. The panel reaches this conclusion because of the difficulty in determining the specific causative agents or the level of control needed to address a specific beneficial use impairment in a receiving water, and because no protocol exists that enables an engineer to design with certainty a BMP that will produce the desired result. (See pages 5-6).

In the fact sheet issued in support of the proposed amendment, Regional Board staff attempt to characterize the panel of expert's report as not applying to the discharges that are the subject of the instant, proposed amendment. To the contrary, the panel of experts were addressing precisely the type of discharges that are the subject of this proposed amendment. The panel of experts did not distinguish between dry- and wet-weather discharges. Moreover, even if the panel had distinguished between the two types of discharges, the reason why the panel of experts concluded numeric effluent limits are not feasible would still apply here.

The fact sheet also appears to imply that the proposed amendment is not imposing numeric effluent limits. Such an assertion, if it is being made, would be pure sophistry. Under the proposed amendment, enforcement appears to be based on whether a sample exceeds a number. The proposed amendment thus appears to be adding a numeric limit for enforcement purposes to the Permit.

- B. The Regional Board should not incorporate numeric bacteria limits into the Permit while the issue is being examined of whether fecal bacteria from nonpoint sources accurately indicates the presence of human pathogens.**

The scientific community's knowledge about bacteria sources and whether bacteria are an appropriate indicator of the presence of human pathogens is limited. This does not mean that in certain circumstances it might not be appropriate for TMDLs to address bacteria. Numeric effluent limits, however, should not be adopted while studies are raising questions about currently-held assumptions, and the studies that have been performed show no health risk where there is no direct contribution from human sources. This is particularly important in Marina del Rey, as the studies to date show significant contributions from birds and wildlife, and little if any contributions from human sources.

**1. According to the study, nonhuman sources contribute to a majority of bacterial loading in the Marina.**

In March 2007, the County submitted to the Regional Board the results of the Non-point Source Study conducted over a one-year period between July 2005 and July 2006. Using a weight-of-evidence approach, the study was designed to determine the relative bacterial loading to the Harbor from sources including, but not limited to, storm drains, boats, birds, and other nonpoint sources. (Mothers' Beach and Back Basins Bacteria TMDL Non-Point Source Study Final Report, Weston Solutions, Inc., February 2007, Pages ES-1). The study found that the majority of the enteric bacteria detected in the Marina del Rey Harbor back basins originate from birds and other wildlife. (Page ES-4.) Human sources were found to contribute only 3 percent of the bacteria for both dry- and wet-weather overall. (Page ES-2.)

**2. Studies performed to date indicate that there might not be a risk to human health where human sources are not present.**

Studies performed to date indicate that one cannot assume that there is a risk to human health where there are no human sources of bacteria. To the contrary, a recent study found no correlation between the risk of illness from waterborne pathogens and fecal indicators (total coliforms, fecal coliforms and enterococcus) at a beach where nonpoint sources were the dominant fecal source. Colford, J. M., T. Wade, K. Schiff, C. Wright, J. Griffith, S. Sandhu, and S. Weisberg 2005), *Recreational Water Contact and Illness in Mission Bay, California, Southern California Coastal Water Research Project, Technical Report 449*. While the report cautioned against extrapolating its findings beyond the study's location, and did not address wet-weather conditions, the author of the study did conclude that the study suggested the need for further evaluation of traditional indicators in circumstances where nonpoint sources are dominant fecal contributors.

Another recent study found that, at enclosed beaches, bacteria may remain in the sand longer than in the water column. (See Lee, C.M., T. Lin, C.-C. Lin, G. A. Kohbodi, A. Bhatt, R. Lee, J. A. Jay (2006) *Sediments as a reservoir for fecal indicators bacteria at three Santa Monica Bay beaches*. Water Research, In press.). This study also demonstrates that our knowledge about these bacteria indicators is still very limited.

A third study, Ishii, S., Hansen, D. L. Hicks, R. E., Sadowsky, M. J., *Beach Sand and Sediments are Temporal Sinks and Sources of Escherichia Coli in Lake Superior*, *Environ. Sci. Technology.*, 41 (7). Web Release Dated: March 1, 2007, likewise found that bacteria may multiply in sand. This study dealing with bacteria in fresh water, also found that less than 1 percent of the strands of *E. coli* being studied were potentially pathogenic, again indicating that the source of the bacteria is an important criteria in determining whether the bacteria poses a health risk to humans.

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Given the question about the risk to human health where no human sources are present, and given the studies that show minimal or no contribution from human sources to the bacteria found in Marina del Rey, the Regional Board should not simply place the proposed numeric criteria into the Permit. Instead the Regional Board should take a more measured approach, at least until there is a better understanding of the risks posed in the Marina and its back basins.

3. **Incorporating numeric limits into the permit could result in the division of resources that could otherwise be devoted to permit programs and compliance with the TMDL.**

The inclusion of numeric limits in the Permit could result in the diversion of resources that could otherwise be devoted to compliance with the TMDL. Although the Regional Board has placed in the permit a process for its staff to follow in determining whether an exceedance warrants further investigation or enforcement (see Finding of Fact 34), the Regional Board is not the sole party that can attempt to enforce the permit's terms. Under the Clean Water Act, any citizen after giving proper notice can file a lawsuit contending that a permittee is not in compliance with the permit's terms, 33 U.S.C. Section 1365. These citizens are not bound by the procedure that the Regional Board has imposed on its staff.

If such a citizen suit were to be filed against any of the responsible jurisdictions, including the County, significant funds and employee resources of that agency would have to be diverted from permit and TMDL programs to addressing that lawsuit. The proposed amendment, to the extent it imposes requirements not subject to the iterative process, invites those lawsuits.

The risk of such a lawsuit is real. Only May 31, 2007, the Natural Resources Defense Council and the Santa Monica BayKeeper sent a letter to the City of Malibu and the County giving notice pursuant to 33 U.S.C. Section 1365 of an intent to sue, contending that the city and the County were discharging in violation of the permit. Although the County believes that it is in compliance with the permit and that NRDC and the BayKeeper will not prevail in any suit, there is no question that such an action, if filed, will divert funds and staff resources that could otherwise go towards pollution reduction programs. Adoption of permit terms like those in the proposed amendment, as opposed to making the terms subject to the iterative process, will only encourage such third party lawsuits and resulting a diversion of resources.



**III. If the Regional Board is going to go forward with the amendment, it should insert the word nonstormwater in Part 1.B and Part 2.6.**

In the fact sheet, it is stated several times that the proposed amendment is aimed solely at nonstormwater discharges. The amendment's proposed language, however, is ambiguous. If the Regional Board is going to adopt the proposed amendment, then to remove this ambiguity the word nonstormwater should be inserted in both proposed Part 1.B. and proposed Part 2.6.

Proposed Part 1.B. thus should read Discharges of nonstormwater summer dry-weather flows from MS4s . . . cause or contribute to exceedances of the bacteria receiving water limitations in Part 2.5 below are prohibited.

Proposed Part 2.6 thus should read during summery dry-weather there shall be no nonstormwater discharges of bacteria from MS4s into Marina del Rey Harbor basins . . .

**IV. Should the Regional Board go forward with its proposed amendment, then proposed Part 2.6 should be renumbered as Part 2.3 and made a part of the iterative process.**

Part 2 of the Permit currently sets forth the iterative process to reach water quality objectives. This is the process recommended by EPA and ordered by the State Water Resources Control Board. See State Board Order WQ 99-05.

The iterative process has been adopted in recognition of the difficulties in addressing stormwater discharges, both during dry- and wet-weather, the difficulties in identifying the specific cause of an exceedance, the difficulties in designing BMPs to produce a specific result, and the need to refine and learn from BMP implementation.

The proposed amendment excepts efforts to comply with water quality objectives in Marina del Rey from the iterative process. The stated reasons are that the summer dry-weather wasteload allocations do not regulate the discharge of stormwater; there is harm to the public and cost to the region associated with illness; efforts to eliminate illicit connections or discharges have not eliminated standards violations at beaches; and few permittees have documented revisions to their synchronization quality meter platform to address chronic exceedances of water quality standards. See Proposed Findings 32.

These stated reasons reflect a basic lack of misunderstanding of the underlying facts. First, the proposed finding asserts that the permit modification does not regulate the discharge of stormwater. This assertion ignores the definition of stormwater, which includes surface runoff and drainage during the summer. See 40 C.F.R. 122.26(b)(13);

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Permit, p. 61. Thus, the discharges at issue could include discharges that fall within the definition of stormwater. As set forth above, to avoid this ambiguity, the word nonstormwater should be added to Parts 1.B. and 2.6 to make clear that the amendment is intended to apply solely to nonstormwater.

Second, there is no evidence to support the conclusion that there is any greater harm to the public or cost to the region by addressing this issue through the iterative approach. Instead the iterative approach has been adopted because it is more effective and cost efficient. Moreover, a strictly prohibitory approach has the potential to waste public funds, especially where the source of bacteria is not fully defined and studies have shown that one can not assume that there is a risk to human health where there are no human sources of bacteria.

Third, there is no evidence that any illicit connection or discharge into the MS4 is contributing bacteria to Marina del Rey. In fact, as Regional Board staff is aware, as part of the Mothers' Beach and Back Basins Bacteria TMDL Nonpoint Source Study, a closed-circuit television camera investigation was conducted of the sewer lines around Mothers' Beach and portions of the basins that are the subject of the MDR Bacteria TMDL. These lines are sanitary sewer lines, not storm channel connections. Nevertheless, steps are already being taken to address any deficiency noted in the sewer lines as a result of this inspection.

Finally, the assertion that there have been no proposed revisions to the synchronization quality meter platform to address the Marina is incorrect. As noted above, the responsible jurisdictions have submitted a Dry- and Wet-weather Implementation Plan which contains extensive recommendations for programs to address the Marina, and some of those programs have already been implemented.

Thus, there is no legitimate basis for excepting efforts to comply with water quality objectives in Marina del Rey from the iterative process, and the stated bases in proposed finding 32 do not provide otherwise.

**V. Any changes to the Permit are required to be made at the time of its renewal, not by way of amendment.**

The Permit was adopted on December 13, 2001. By its terms, it was due to expire on December 13, 2006.

On June 12, 2006, the permittees, including the County, submitted a Report of Waste Discharge, applying for issuance of a new permit. That application remains pending. By reason of the application, the terms of the Permit have remained in effect until the permit is issued.

Because the Permit term has expired and a new permit application has been submitted, the Regional Board is without authority to reopen the Permit and amend it. Instead the Regional Board must address any modification through issuance of a new permit itself. 23 Cal. Code Reg. Section 2235.4 provides that the terms and conditions of an expired permit are automatically continued pending issuance of a new permit if all requirements of the Federal NPDES regulations on continuation of expired permits are complied with. 40 C.F.R. Section 126.62(a) provides that permits may be modified only during their terms. The permit had a five-year term. Although the Permit's provisions remain in effect during the current application process pursuant to 23 Cal. Code Reg. Section 2235.4 and 40 C.F.R. Section 122.6, nothing in either of these sections allows modification as opposed to issuance of a new permit.

Moreover, even if the Regional Board has the authority to amend a permit after its term has expired and an application for a new permit is pending, to do so here would be arbitrary and capricious. The Regional Board staff has not processed the permittees' application for a new permit, and the fact sheet indicates that the staff does not intend to bring the application before the Regional Board until 208. It is arbitrary and capricious to fail to process the application and then contend it is necessary to make immediate changes to the old Permit's terms. It is arbitrary and capricious to make piecemeal changes to the old Permit, rather than to give the permittees a hearing on a new permit as a whole.

**VI. There is no lawful basis for making one permittee responsible for the conduct of other permittees.**

Proposed footnote 3 contains the provisions that all permittees within a subwatershed of the Santa Monica Bay Watershed Management Area are jointly responsible for compliance with the limitations imposed in Tables 7-4.1 and 7-5.1 of the Basin Plan.

There is no lawful basis, however, for making one permittee responsible for another permittee's compliance. Under the Clean Water Act and the California Water Code, a permittee is responsible for its own discharge. Under the Permit, a permittee is responsible for its own discharge. Thus a provision asserting that all permittees within a subwatershed are jointly responsible for compliance is not enforceable and has no place in the Permit. This provision should be deleted.

**VII. The proposed findings are not sufficient to support the proposed amendment and the evidence identified to date does not support the proposed findings.**

The Permit's provisions must be supported by adequate findings. Water Code Sections 13263 and 13377; Code of Civil Procedure Section 1094.5. The proposed amendment does not meet this requirement. To include the proposed amendment in the Permit, the Regional Board must first make the following findings to support the amendment:

1. A finding identifying the sources of the bacteria at issue.
2. A finding that it is technically feasible to comply with the terms of this amendment.
3. A finding that the terms of the amendment can be met through cost-effective programs that will be accepted by the public.
4. A finding that the amendment will not require the permittees to adopt controls or implement programs that go beyond the maximum extent practicable standard applicable to municipal stormwater permits, 33 U.S.C. Section 1342(p)(3)(B)(iii) in order to comply with the amend.
5. A finding that the terms of the amendment are reasonably achievable.
6. A finding that the Regional Board has considered all factors set forth in the Water Code Section 13241, including (a) the environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto, (b) water quality conditions that could reasonably be achieved through the coordinated control of all facts which affect water quality in the areas, and (c) economic considerations.
7. A finding that the amendment is reasonable in light of the Water Code Section 13241 facts.



The evidence identified to date in the notice and the fact sheet is insufficient to support the findings the Regional Board is required to make before it can adopt the proposed amendment. For the reasons previously discussed, the evidence also does not support Proposed Finding 32.

#### VIII. Administrative record

Pursuant to the notice of hearing, the County requests that the following studies, memorandum and documents in the Regional Board's files be brought to the hearing and included in the administrative record:

1. The Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial Total Maximum Daily Load Dry- and Wet-Weather Implementation Plan.
2. Mothers' Beach and Back Basins Bacteria TMDL Nonpoint Source Study.
3. *The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities* (State Water Resources Control Board Panel of Experts, June 2006).
4. Colford, J. M., T. Wade, K. Schiff, C. Wright, J. Griffith, S. Sandhu, and S. Weisberg (2005), Recreational Water Contact and Illness in Mission Bay, California, *Southern California Coastal Water Research Project, Technical Report 449*.
5. Lee, C. M., T. Lin, C. Lin, G. A. Kohbodi, A. Bhatt, R. Lee, J. A. Jay (2006) Sediments as a Reservoir for Fecal Indicators Bacteria at Three Santa Monica Bay Beaches, Water Research. In press.
6. Noble, R. T., Griffith, J. F., Blackwood, A. D., Fuhrman, J. A. Gregory, J. B. Hernandez, X., Liang, X., Bera, A. A., and Schiff, K., Multitiered Approach Using Quantitative PCR to Track Sources of Fecal Pollution Affecting Santa Monica Bay, California. *Applied and Environmental Microbiology* (February 2006).

7. EPA memorandum, dated November 22, 2002, entitled, Establishing Total Maximum Daily Load (TMDL) Wasteload Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs.
8. Letter dated May 31, 2007, from the Santa Monica BayKeeper and NRDC to the County of Los Angeles and the City of Malibu. (The letter reflects that a copy was sent to both Francine Diamond, Chair, and Deborah Smith, Acting Executive Officer of the Regional Board.)

The County also requests that the following study be included as part of the administrative record. If a copy is not in the Regional Board's files or available to its staff, the County will submit a copy before the hearing: Ishii, S., Hansen, D. L. Hicks, R. E., Sadowsky, M. J., Beach Sand and Sediments are Temporal Sinks and Sources of Echerichia Coli in Lake Superior Environ. Sci. Technology., 41 (7). Web Release Date: March 1, 2007.

The County reserves the right to supplement this list or submit other evidence after reviewing any responses to comments issued by the Regional Board staff and at the hearing itself.

#### IX. Conclusion

For the above reasons, the County submits that the best approach to achieving water equality objectives is a partnership between the Regional Board and its staff, the County, and the other responsible agencies named under the MDR Bacteria TMDL. The Regional Board should defer consideration of the proposed amendment at this time. Moreover, any amendment should incorporate an iterative, BMP-based approach to achieve the desired water quality goals.

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If you have any questions, please contact me at (626) 458-4300, or  
mpestrel@dpw.lacounty.gov.

Thank you for consideration of these comments.

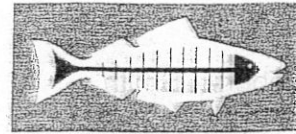
Very truly yours,

DONALD L. WOLFE  
Director of Public Works



MARK PESTRELLA  
Assistant Deputy Director  
Watershed Management Division

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Heal the Bay

June 25, 2007

Ms. Deborah Smith, Interim Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 W. 4<sup>th</sup> Street, Ste. 200  
Los Angeles, CA 90013

Re: Comments on the Proposed Reopener of the County of Los Angeles  
Municipal Stormwater Discharge Permit (NPDES No. CAS004001)

Dear Ms. Smith:

Thank you for the opportunity to comment on the proposed incorporation of the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria Total Maximum Daily Load ("MDR Bacteria TMDL") for summer dry weather discharges from MS4 outfalls to Marina del Rey Harbor into the Los Angeles County MS4 National Pollutant Discharge Elimination System ("NPDES") permit. Federal law mandates that the Los Angeles Regional Water Quality Control Board ("Regional Board") integrate TMDLs into NPDES permits. Santa Monica Baykeeper, Inc. and Heal the Bay support the Regional Board staff in proposing the L.A. MS4 permit reopener, dated July 12, 2007.

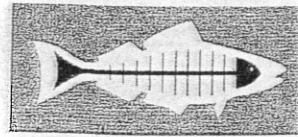
The Regional Board adopted the MDR Bacteria TMDL with Resolution No. 2003-012 in 2003. The TMDL was subsequently approved by the State Water Resources Control Board ("State Board") with Resolution No. 2003-0072. On March 18, 2004, following the approval of the U.S. EPA, the MDR Bacteria TMDL became effective. Compliance with the TMDL's summer dry weather Waste Load Allocations (WLAs) was to be achieved by March 18, 2007.

This reopener is consistent with the September 14, 2006 amendment of the LA County MS4 NPDES permit which incorporated the Santa Monica Beach Bacteria TMDL WLAs for summer dry weather. Although Marina del Rey Watershed is a subwatershed of the Santa Monica Bay Watershed, this reopener is required because there are separate summer dry weather Bacteria TMDLs for each.

All monitored locations in MDR must meet state beach bacteria health standards 100% of the time during summer dry weather (April 1 to October 31). Based on data collected, it is clear that a number of locations in MDR do not comply with the MDR Bacteria TMDL requirements for summer dry weather. Specifically, data collected since April 1, 2007 show at least 10 exceedance days of the MDR Bacteria TMDL requirements for summer dry weather. Seven of these exceedance days were at Mothers Beach, a beach frequented by families. This demonstrates that the State needs an additional tool to assure compliance.

The reopener is timely as it will enforce the MDR Bacteria TMDL for summer dry weather during the summer season, which is the period of highest use of the beaches and waters of



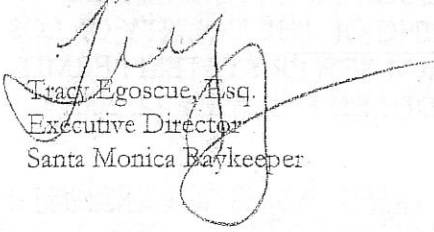


Heal the Bay

Marina del Rey Harbor. As a result of this reopener, the health of thousands of people visiting Mothers' Beach and Back Basins will be better protected. Santa Monica Baykeeper and Heal the Bay commend the Regional Board Staff for proposing a reopener to address the problem with bacterial pollution at the Marina del Rey Harbor and thus expediting the inclusion of the MDR Bacteria summer dry weather WLAs of the TMDL instead of waiting until 2008 to include the already adopted TMDL in the new LA County MS4 NPDES permit.

Santa Monica Baykeeper and Heal the Bay thank the Regional Board Staff for its hard work in preparation of this reopener which is an important step in improving the water quality of Santa Monica Bay.

Sincerely,

  
Tracy Egoscue, Esq.  
Executive Director  
Santa Monica Baykeeper

Mark Gold  
Mark Gold, D. Env. by TKG  
President  
Heal the Bay



# California Regional Water Quality Control Board Los Angeles Region



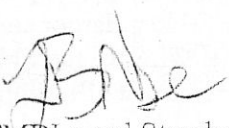
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Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful

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Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

TO: Interested Parties

FROM: Dr. LB Nye   
Unit Chief, TMDLs and Standards

DATE: July 2, 2007

SUBJECT: NOTICE OF CONTINUATION OF THE REGIONAL BOARD PUBLIC HEARING ON THE PROPOSED REOPENING OF THE COUNTY OF LOS ANGELES MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT (NPDES PERMIT NO. CAS004001) SCHEDULED FOR JULY 12, 2007

The California Regional Water Quality Control Board, Los Angeles Region, was scheduled to consider a proposed reopening of the waste discharge requirements for the Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit to incorporate a non-storm water discharge prohibition to be consistent with the summer dry weather Waste Load Allocations set in the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria Total Maximum Daily Load during its July 12, 2007 Board meeting. This notice informs interested parties that the board meeting has been cancelled due to lack of a quorum. Therefore, the proposed reopening of the waste discharge requirements for the Los Angeles County MS4 Permit has been continued to the August 9, 2007 Board meeting. This board meeting, which the public hearing will be a part of, will be held at 9:00 AM at the:

Metropolitan Water District of Southern California  
Board Meeting Room  
700 North Alameda Street  
Los Angeles, California 90012

If you have any question regarding this proposed action, please contact Rebecca Christmann at (213) 576-6757 or via email at [rchristmann@waterboards.ca.gov](mailto:rchristmann@waterboards.ca.gov). If you have general questions regarding the County of Los Angeles Municipal Storm Water Discharge Permit, please contact Carlos Urrunaga at (213) 620-2083 or via email at [currenaga@waterboards.ca.gov](mailto:currenaga@waterboards.ca.gov).





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 DATE MAILED: 7/2/07

DATEJOINED_	EMAILADDR_	FULLNAME_
3/2/2005 9:56	Citymanager@hiddenhillscity.org	Cherie L. Paglia
10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
11/2/2005 14:00	Gerhardt.Hubner@ventura.org	Gerhardt Hubner
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
12/30/2004 1:29	Joemamabush@netzero.com	Joe Bell
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
1/15/2003 0:00	JohnB648@AOL.com	John Bullington
3/1/2005 10:40	RWPearson@aol.com	Roger W. Pearson
2/3/2001 0:00	Will@Chico.com	William Harris
2/22/2005 9:27	aahlering@ladpw.org	Andrew Ahlering
12/13/2005 9:31	adavis@rbf.com	Anne G. Davis
12/19/2005 11:22	adorablesam_4@yahoo.co.in	sam
1/3/2001 0:00	aharrington@ci.claremont.ca.us	Andrea Harrington
10/1/2001 0:00	ahunter@sanpedro.com	Alan Hunter
9/27/2005 13:12	akeller@hnpc.com	Andrew Keller
9/8/2005 10:08	allen.camp@sfcoc.com	Allen F. Camp
12/28/2004 7:34	asaponara@treadwellrollo.com	Anthony Saponara
11/15/2005 12:22	ashlic@lwa.com	Ashli Desai
3/7/2005 13:11	barry.snyder@amec.com	Barry J. Snyder
2/22/2007 14:38	barvai@fuscoe.com	Bryan Arvai
2/28/2005 16:44	baykeeper@smbaykeeper.org	Tracy Egoscue
9/24/2005 15:30	belascodave@sbcglobal.net	David Belasco
3/1/2005 9:59	blwilliams@ci.ventura.ca.us	Robert L. Williams
7/18/2006 19:43	bscheiwe@iacorps.org	Brent Scheiwe
9/20/2006 14:25	ca3@imsinfo.com	Cory R. Espinoza
3/2/2005 7:13	canderson@ci.azusa.ca.us	Chet F. Anderson
1/11/2001 0:00	cardoza_angel@yahoo.com	Angel Cardoza Jr.
5/4/2006 16:09	carla.cummings@westonsolutions.com	Carla Cummings
4/25/2002 0:00	catherinedvoss@aol.com	Catherine Voss
1/25/2006 7:05	cathy.chang@culvercity.org	Cathy Chang
7/20/2006 15:30	charlie.yu@lacity.org	Charlie Yu
7/15/2005 17:52	chris@nautilusenvironmental.com	Chris Stransky
2/28/2005 13:13	cleanwater@sfo.com	Daniel Cooper
10/4/2006 9:09	cmitchell@mbcnet.net	Charles T. Mitchell
10/1/2004 13:12	courtney.morgan@hydromail.com	Courtney Morgan
6/1/2006 8:25	csaylan@earthlink.net	charles saylan
6/24/2004 16:23	cyavas@akmce.com	Kenk Yavas
9/27/2005 13:01	darla.wise@ventura.org	Darla D. Wise
7/6/2005 8:51	dasengineering@comcast.net	David Sluga
2/28/2005 11:30	dave.randell@erm.com	David H. Randell
7/21/2004 14:55	eliza@lawyersforcleanwater.com	Eliza Smith
4/5/2005 9:52	fchin@ladpw.org	Frank Chin
8/6/2002 0:00	gary.wortham@tetrattech.com	Gary Wortham
11/16/2006 14:00	garypoe@windowsonourwaters.org	Gary Poe
1/20/2005 14:16	gem@san.lacity.org	Gerald E. McGowen
10/25/2005 8:02	ggearheart@waterboards.ca.gov	Greg Gearheart
1/6/2005 0:28	ggtest2007@yahoo.ie	FSD
8/18/2005 15:54	greg.hyatt@iwpnews.com	Greg Hyatt
12/22/2006 8:49	gregory.savitske@tetrattech-ffx.com	Gregory Savitske
10/24/2005 11:59	gwlaforge@aei-casc.com	Gary W. LaForge
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4/25/2006 14:31 hgallardy@ladpw.org  
6/22/2007 18:29 hgest@burhenngest.com  
3/22/2002 0:00 jalee@council.lacity.org  
3/1/2005 14:16 jbeller@san.lacity.org  
2/4/2006 15:55 jchesler@lacodbh.org  
7/22/2005 12:08 jcrisol@dhsc.ca.gov  
3/3/2005 11:08 jcruz@ladpw.org  
4/13/2007 16:56 jfordyce@waterboards.ca.gov  
3/1/2005 14:53 jgibson@torrnet.com  
3/1/2005 15:11 jgregg@coastal.ca.gov  
1/25/2006 7:47 jgully@lacsds.org  
2/8/2004 16:24 jhipp@uci.edu  
9/7/2004 12:16 jmarches@san.lacity.org  
7/17/2006 13:22 jpereira@ladpw.org  
4/5/2007 16:20 justin@calcattlemen.org  
3/9/2005 11:53 jvanwagn@mailbox.lacity.org  
4/16/2003 0:00 kae@jmbm.com  
3/1/2005 16:50 kamcdonnell@mactec.com  
10/30/2003 0:00 kathleen.enve@verizon.net  
10/23/2006 16:00 kfarfsing@cityofsignalhill.org  
9/26/2006 23:35 kimo@pukashell.net  
6/22/2004 12:29 kjones@dot.ca.gov  
3/24/2005 14:34 kprickett@portla.org  
4/8/2003 0:00 kragland@portla.org  
3/14/2007 16:53 krubin@ladwp.com  
4/16/2002 0:00 kruffell@lacsds.org  
3/3/2005 14:26 ksnow@csulb.edu  
10/11/2005 15:34 ksusilo@geosyntec.com  
4/19/2007 9:52 kward@waterboards.ca.gov  
2/12/2007 10:18 laurie\_solis@urscorp.com  
12/20/2006 15:37 leo@wecklabs.com  
2/28/2005 15:10 lgarcia@unitedstormwater.com  
4/4/2007 10:09 lgilbane@csulb.edu  
2/28/2005 11:12 lorettac@ci.irwindale.ca.us  
10/25/2004 9:10 macariaf@hotmail.com  
3/1/2005 13:14 mad@san.lacity.org  
6/25/2004 8:23 maflores@waterboards.ca.gov  
3/1/2005 13:32 mark.pumford@ci.oxnard.ca.us  
1/18/2002 0:00 marym@water.ca.gov  
10/18/2005 9:54 mbaker@crglabs.com  
1/4/2006 11:50 mbearzi@earthlink.net  
12/28/2004 12:15 mbiedebach@wcenviro.com  
3/2/2005 9:36 mermaid@smbaykeeper.org  
3/1/2005 10:07 mike.shay@redondo.org  
3/1/2005 11:27 mkissel@ckr.com  
3/3/2005 10:09 mlcoffee@nossaman.com  
7/12/2006 16:21 mlevy@waterboards.ca.gov  
1/25/2006 18:01 mpestrel@ladpw.org  
3/26/2007 14:40 mpeterson@kpcc.org  
3/4/2005 14:59 mrnolan@socal.rr.com  
9/23/2004 12:04 mtaylor@bna.com  
2/7/2007 20:52 mweber@resourceslawgroup.com

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Jack H. Gregg  
Joseph R. Gully  
James Aaron Hlpp  
Jim Marchese  
Jason Pereira  
Justin Oldfield  
Julie Van Wagner  
Ken Ehrlich  
Kathleen McDonnell  
Kathleen McGowan  
Kenneth C. Farfsing  
A. Kimo Morris Ph.D.  
Keith Jones  
Kat Prickett  
Kenneth Ragland  
Katherine Rubin  
Kristen Ruffell  
Kathleen Snow  
Ken Susilo  
Kim Ward  
laurie solis  
Leo Raab  
Lyndon Garcia  
Lisa Gilbane  
Loretta Corpis  
macaria flores  
Masahiro Dojiri  
Macaria Flores  
Mark Pumford  
Mary M. Miller  
Mark D. Baker  
Dr. Maddalena Bearzi  
Mike Biedebach  
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10/25/2006 11:03 oac06\_07@yahoo.com  
8/4/2005 15:12 octopus@smbaykeeper.org  
9/23/2005 9:17 paul.tantet@ventura.org  
5/21/2007 15:08 peterson@polb.com  
10/24/2005 11:14 pgouveia@waterboards.ca.gov  
5/9/2006 13:52 pjenkin@sbcglobal.net  
2/24/2006 12:06 powerskj@yahoo.com  
1/27/2006 11:04 rchristmann@waterboards.ca.gov  
4/28/2006 8:51 richard.a.haimann@mwhglobal.com  
5/10/2007 10:06 rob.osborne@redondo.org  
8/15/2002 0:00 robert\_wu@dot.ca.gov  
1/26/2006 7:28 rorton@lvmwd.com  
3/2/2005 10:27 rprieto@cla.lacity.org  
7/11/2006 15:55 rsams@waterboards.ca.gov  
3/7/2005 14:34 sbawden@jlha.net  
1/4/2007 11:32 schambers@sspa.com  
4/23/2004 15:24 scott@totalsitemaintenance.com  
8/23/2006 23:14 service@popeyespumpout.com  
7/13/2004 14:25 shilgert@rbf.com  
8/16/2000 0:00 snasserie@waterboards.ca.gov  
6/14/2006 17:34 sparent@clarku.edu  
8/11/2005 16:09 svogel@rap.lacity.org  
3/1/2002 0:00 tduffy@coastal.ca.gov  
2/27/2001 0:00 thughes@opw-fc.com  
3/11/2005 9:09 tjkim@brwncald.com  
3/18/2002 0:00 tklinger@co.la.ca.us  
4/12/2006 12:46 tmoorhouse@cleanlake.com  
3/2/2005 11:01 toleary@longbeach.gov  
10/5/2000 0:00 trodgers@waterboards.ca.gov  
3/1/2005 11:02 tsullivan@cityofavalon.com  
4/22/2003 0:00 vconway@lacsds.org  
11/19/2001 0:00 waterman4u2@hotmail.com  
10/11/2006 14:13 wbotha@daley-heft.com  
12/18/2000 0:00 wcis@chevron.com  
1/24/2006 16:33 wetlandact@earthlink.net  
4/4/2006 16:22 ysim@ladpw.org  
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Richard Haimann  
Rob Osborne  
Bob Wu  
Dr. Randal Orton  
Rafael Prieto  
Robert Sams  
Susan Bawden  
Steven R. Chambers  
Scott Morris  
Dan Maze  
Shawna Hilgert  
Susana Nasserie  
Stephanie Parent  
Steve Vogel  
Tracy Duffey  
Tim Hughes  
TJ Kim  
Thomas Klinger  
Thomas Moorhouse  
Tom Leary  
Theresa Rodgers  
Thomas Sullivan  
Victoria O. Conway  
David DuVarney  
Wentzelee Botha  
Wayne Ishimoto  
Marcia Hanscom  
Youn Sim  
Yvette M. Lama  
Zora Baharians



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LIST NAME: Bullington  
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3/10/2005 10:12	DLaff@ladpw.org	Daniel J. Lafferty
4/11/2006 14:03	Edgar.Saenz@mail.house.gov	Edgar Saenz
4/12/2006 8:13	Elizabeth.Laskowska@lacity.org	Elizabeth Laskowska
10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
1/15/2003 0:00	JohnB648@AOL.com	John Bullington
9/28/2006 10:58	Lee.Peterson@dailybreeze.com	Lee Peterson
12/1/2006 11:26	Leila.Barker@lacity.org	Leila Barker
3/17/2005 20:27	RES0OCNI@VERIZON.NET	Irma Gallegos
3/4/2005 6:57	RKUBOMO@ladpw.org	Rod Kubomoto
3/1/2005 10:40	RWPearson@aol.com	Roger W. Pearson
10/25/2004 8:31	Skennedy@enfact.net	Shiela Kennedy
4/11/2006 14:14	Wing.Tam@lacity.org	Wing Tam
5/24/2006 11:56	acor@ucla.edu	Alina Corcoran
12/13/2005 9:31	adavis@rbf.com	Anne G. Davis
12/19/2005 11:22	adorablesam_4@yahoo.co.in	sam
1/3/2001 0:00	aharrington@ci.claremont.ca.us	Andrea Harrington
12/17/2005 8:28	aheil@lacsds.org	Ann Heil
8/6/2003 0:00	akiko.kawaguchi@mwhglobal.com	Akiko Kawaguchi
3/28/2005 13:31	amarsh@pirnie.com	Anita Marsh
8/24/2006 15:29	arri@mtaonline.net	Jeffrey Davis
12/28/2004 7:34	asaponara@treadwellrollo.com	Anthony Saponara
11/15/2005 12:22	ashlic@lwa.com	Ashli Desai
3/2/2005 13:11	barbara_klos@urscorp.com	Barbara A. Klos
3/7/2005 13:11	barry.snyder@amec.com	Barry J. Snyder
2/22/2007 14:38	barvai@fuscoe.com	Bryan Arvai
2/28/2005 16:44	baykeeper@smbaykeeper.org	Tracy Egoscue
3/28/2005 15:13	boylehm@cdm.com	Heather Boyle
3/2/2005 20:04	brader@popsound.com	Brian Rader
3/16/2005 9:48	bteaford@ci.burbank.ca.us	Bonnie Teaford
12/21/2000 0:00	bvlach@ciwmb.ca.gov	Bernard R. Vlach
9/20/2006 14:25	ca3@imsinfo.com	Cory R. Espinoza
5/4/2006 16:09	carla.cummings@westonsolutions.com	Carla Cummings
1/25/2006 7:05	cathy.chang@culvercity.org	Cathy Chang
7/20/2006 15:30	charlie.yu@lacity.org	Charlie Yu
3/1/2005 7:20	cinciong@ladpw.org	Carrie Inciong
2/28/2005 13:13	cleanwater@sfo.com	Daniel Cooper
10/4/2006 9:09	cmitchell@mbcnet.net	Charles T. Mitchell
8/1/2002 0:00	collins-6666@msn.com	J. Roger Collins
10/1/2004 13:12	courtney.morgan@hydromail.com	Courtney Morgan
2/28/2005 15:13	cperez@newhall.com	Cris Perez
6/1/2006 8:25	csaylan@earthlink.net	charles saylan
4/5/2005 8:39	csjoberg@ladpw.org	Carl W. Sjoberg
7/17/2006 17:05	currunaga@waterboards.ca.gov	Carlos Urrunaga
3/11/2005 16:06	danflorescu@caaprofessionals.com	Dan Florescu
3/13/2007 14:10	dapt@rbf.com	Daniel Apt
1/20/2005 13:51	dave@integratedwater.com	Dave Parkinson
3/4/2005 14:24	dburhenn@burhennigest.com	Dave Burhenn

2/13/2007 9:57 deana@aquabiocleanup.com  
 6/6/2006 15:12 deborah.weinstein@lacity.org  
 7/6/2006 13:30 dfox@treepeople.org  
 5/17/2001 0:00 djwri@hotmail.com  
 9/23/2005 9:12 dnarrieta@aol.com  
 1/12/2005 11:16 dneiter@waterboards.ca.gov  
 3/17/2006 14:34 donna.chen@lacity.org  
 11/26/2003 0:00 dwebster@calrestrats.com  
 2/28/2005 14:47 dwpi@chevrontexaco.com  
 2/28/2005 9:05 earl.lapensee@rcslade.com  
 9/12/2006 14:36 ewu@waterboards.ca.gov  
 4/5/2005 9:52 fchin@ladpw.org  
 9/26/2005 23:43 fkrieger@msn.com  
 3/3/2005 15:51 fleming.terrence@epa.gov  
 7/7/2006 16:27 gamah@waterboards.ca.gov  
 8/6/2002 0:00 gary.wortham@tetrattech.com  
 8/15/2005 13:52 gfrantz@waterboards.ca.gov  
 12/5/2005 10:35 gfredlee@aol.com  
 10/5/2006 10:00 ggrene@downeyca.org  
 5/30/2006 10:34 ghasg3112@aol.com  
 3/9/2005 10:45 ghildeb@ladpw.org  
 1/22/2002 0:00 gilw@lwa.com  
 10/12/2005 15:50 gmarsh@waterboards.ca.gov  
 9/14/2006 13:40 gmusejr@mwdh2o.com  
 10/6/2004 8:54 gogos0@bp.com  
 12/22/2006 8:49 gregory.savitske@tetrattech-ffx.com  
 1/16/2007 8:05 gvillarreal@rbf.com  
 10/24/2005 11:59 gwlaforge@aei-casc.com  
 3/2/2005 16:00 hashimoto.janet@epa.gov  
 4/25/2006 14:31 hgallardy@ladpw.org  
 6/22/2007 18:29 hgest@burhennest.com  
 8/14/2006 17:08 hiiho@sbcglobal.net  
 11/17/2005 11:07 houstgrp@pacbell.net  
 10/10/2006 10:57 hschillinger@kristar.com  
 12/7/2006 17:28 jbell@mwdh2o.com  
 3/1/2005 14:16 jbeller@san.lacity.org  
 1/12/2005 11:15 jbishop@waterboards.ca.gov  
 5/9/2006 12:33 jcox@waterboards.ca.gov  
 3/3/2005 11:08 jcruz@ladpw.org  
 4/13/2007 16:56 jfordyce@waterboards.ca.gov  
 1/25/2006 7:47 jgully@lacs.d.org  
 3/1/2005 9:21 jhall@waterboards.ca.gov  
 3/1/2005 12:56 jharmon@weho.org  
 3/2/2005 16:53 jhunter@jlha.net  
 4/12/2006 14:14 jim.lamm@ballonacreek.org  
 7/13/2005 10:08 jjensen@waterboards.ca.gov  
 3/4/2005 9:54 jmundy@lvmwd.com  
 7/21/2005 9:10 jnewman@waterboards.ca.gov  
 10/12/2005 12:51 john.craig@tetrattech-ffx.com  
 7/17/2006 13:22 jpereira@ladpw.org  
 7/16/2004 13:29 jprice@waterboards.ca.gov  
 3/4/2005 12:40 jskelley@socal.rr.com

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 Deborah Weinstein  
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 Dan Wright  
 David Arrieta  
 Deborah Neiter  
 Donna Chen  
 Debbie Webster  
 David W. Pierce  
 Earl LaPensee  
 Eric Wu  
 Frank Chin  
 Fred Krieger  
 Terrence Fleming  
 Ginachi Amah  
 Gary Wortham  
 Greg Frantz  
 G. Fred Lee  
 Gerald Greene  
 Glen Hasegawa  
 Gary Hildebrand  
 Gil Wheeler  
 Glenda Marsh  
 George W. Muse Jr.  
 Stefan Gogosha  
 Gregory Savitske  
 Gian Villarreal  
 Gary W. LaForge  
 Janet Hashimoto  
 Heather Gallardy  
 Howard Gest  
 Barry Silver  
 Laura Cottrell  
 Hai Schillinger  
 Janet Bell  
 Jeffrey Beller  
 Jonathan Bishop  
 Joanne Cox  
 Jemellee Cruz  
 Jennifer Fordyce  
 Joseph R. Gully  
 Jessica Hall  
 Jan Harmon  
 John Hunter  
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 Joanna Jensen  
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 Jason Pereira  
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3/3/2005 13:05	jyoshino@ci.walnut.ca.us	Jack Yoshino
3/1/2005 16:51	kamcdonnell@mactec.com	Kathleen McDonnell
3/15/2005 14:42	kathleen.enve@verizon.net	Kathleen McGowan
6/15/2006 16:08	ken.franklin@lacity.org	Kenneth Franklin
10/23/2006 16:00	kfarfsing@cityofsignalhill.org	Kenneth C. Farfsing
3/8/2005 15:09	kharris@waterboards.ca.gov	Ken Harris
3/4/2005 10:03	kimberlycolbert@caaprofessionals.com	Kimberly Colbert
9/26/2006 23:35	kimo@pukashell.net	A. Kimo Morris Ph.D.
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6/22/2004 12:29	kjones@dot.ca.gov	Keith Jones
3/3/2005 9:18	kkeeling@bonterraconsulting.com	Kristin Keeling
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3/24/2005 14:34	kprickett@portla.org	Kat Prickett
3/14/2007 16:53	krubin@ladwp.com	Katherine Rubin
10/11/2005 15:34	ksusilo@geosyntec.com	Ken Susilo
5/22/2006 12:45	kthompson@mail.wqa.org	Kelley Thompson
3/20/2002 0:00	kwf@san.lacity.org	Kris Flaig
2/12/2007 10:18	laurie_solis@urscorp.com	laurie solis
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12/20/2006 15:37	leo@wecklabs.com	Leo Raab
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2/7/2001 0:00	lisa.williams@lsa-assoc.com	Lisa Williams
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1/19/2005 10:42	lmartinez@biasc.org	Lisa Martinez
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2/28/2005 11:12	lorettac@ci.irwindale.ca.us	Loretta Corpis
3/17/2005 14:19	mariki@ladpw.org	Menerva Ariki
1/18/2002 0:00	marym@water.ca.gov	Mary M. Miller
10/18/2005 9:54	mbaker@crglabs.com	Mark D. Baker
1/12/2005 11:15	mbecker@waterboards.ca.gov	Melinda Becker
7/11/2006 16:12	mcohen@rwglaw.com	Matthew Cohen
3/28/2005 15:37	mgold@healthebay.org	Mark Gold
3/3/2005 10:09	mlcoffee@nossaman.com	Mary Lynn Coffee
7/11/2006 13:49	mlevy@waterboards.ca.gov	Michael Levy
1/25/2006 18:01	mpestrel@ladpw.org	Mark Pestrella
3/26/2007 14:40	mpeterson@kpcc.org	Molly Peterson
4/4/2007 9:11	mpf@stateside.com	Melissa Patra Farmer
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2/8/2007 9:35	nadadora79@hotmail.com	Laurel Fink
11/29/2006 11:09	neal.shapiro@smgov.net	Neal Shapiro
10/25/2006 11:03	oac06_07@yahoo.com	Dillon Henry
10/24/2005 11:14	pgouveia@waterboards.ca.gov	Patricia Gouveia
8/16/2005 14:27	pmcgaw@archernorris.com	Peter W. McGaw
2/24/2006 12:06	powerskj@yahoo.com	Kevin Powers
4/16/2006 0:31	pweinberger55@hotmail.com	Peter Weinberger
1/27/2006 11:04	rchristmann@waterboards.ca.gov	Rebecca Christmann

1/12/2005 11:06	rdeshazo@waterboards.ca.gov	Renee DeShazo
5/18/2006 11:41	rexfrankel@yahoo.com	Rex Frankel
9/23/2005 9:31	rez1@earthlink.net	David Reznick
4/28/2006 8:51	richard.a.haimann@mwhglobal.com	Richard Haimann
8/15/2002 0:00	robert_wu@dot.ca.gov	Bob Wu
3/7/2005 7:30	roger.james@worldnet.att.net	Roger B James
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7/11/2006 13:49	rsams@waterboards.ca.gov	Robert Sams
3/2/2006 15:42	sanderd@slc.ca.gov	Dwight E. Sanders
4/18/2007 9:25	sbeltran@allenmatkins.com	Shanda Beltran
3/7/2005 11:28	sbroten@icfconsulting.com	Scott Broten
4/24/2003 0:00	schroederdj@cdm.com	Donald Schroeder
1/3/2006 11:39	sewers@dslextreme.com	Anna Sklar
8/9/2005 19:51	sgreen@lacsds.org	Sharon N. Green
7/19/2006 17:36	shanda.beltran@lw.com	shanda beltran
9/20/2004 19:06	shcarr@san.lacity.org	seth carr
2/28/2005 17:29	shellis@lwa.com	Shelli St.Clair
3/28/2005 15:36	smith.davidw@epa.gov	David W. Smith
10/5/2000 0:00	snasserie@waterboards.ca.gov	Susana Nasserie
2/28/2005 10:33	spaulsen@flowscience.com	Susan C. Paulsen Ph.D. P.E.
4/12/2007 11:02	sschales@ladpw.org	T Scott Schales
3/2/2005 9:44	susanstark10@sbcglobal.net	Susan Stark
1/6/2005 15:15	tbilezikjian@rbf.com	Tanya Bilezikjian
3/6/2007 8:05	tfung@dot.ca.gov	Tom Fung
4/2/2007 12:04	tom@mediapage.com	Tom Kravitz
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3/11/2005 12:43	vanessatubaces@caaprofessionals.com	Vanessa Tubaces
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10/19/2005 14:45	vndesai@san.lacity.org	Vijay N. Desai
10/11/2006 14:13	wbotha@daley-heft.com	Wentzelee Botha
11/18/2005 5:14	wfunderburk@sfcfirm.com	William Funderburk
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10/5/2006 14:49	zora.baharians@lacity.org	zora Baharians

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4/11/2006 14:03	Edgar.Saenz@mail.house.gov	Edgar Saenz
4/12/2006 8:13	Elizabeth.Laskowska@lacity.org	Elizabeth Laskowska
10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
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9/28/2006 10:58	Lee.Peterson@dailybreeze.com	Lee Peterson
12/1/2006 11:26	Leila.Barker@lacity.org	Leila Barker
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3/3/2005 15:51 fleming.terrence@epa.gov  
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5/9/2006 12:33 jcox@waterboards.ca.gov  
7/22/2005 12:09 jcrisololo@dhs.ca.gov  
3/3/2005 11:08 jcruz@ladpw.org  
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Frank Chin  
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Gary Wortham  
Gerald Greene  
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Gregory Savitske  
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Gian Villarreal  
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Janet Hashimoto  
Heather Gallardy  
Laura Cottrell  
Janet Bell  
Jeffrey Beller  
Jeff Berlin  
Joanne Cox  
Joseph Crisologo  
Jemellee Cruz  
John Dettle  
Jennifer Fordyce  
Jeffery W. Gibson  
Joseph R. Gully  
John Hunter  
Joanna Jensen  
Jess Morton  
Jenny Newman  
Jason Pereira  
Jason Pereira  
Jose Rodriguez  
Joseph Skelley  
Joyce T. Clark  
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Stan Keolanui  
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12/19/2006 13:43 neal.shapiro@smgov.net	Neal Shapiro
10/25/2006 11:03 oac06_07@yahoo.com	Dillon Henry
6/20/2002 0:00 patrick.covert@valero.com	Patrick M. Covert
10/3/2006 11:16 pelkins@carson.ca.us	Patricia Elkins
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3/8/2005 8:39 pjohansen@portla.org	Paul Johansen
8/16/2005 14:27 pmcgaw@archernorris.com	Peter W. McGaw
2/24/2006 12:06 powerskj@yahoo.com	Kevin Powers
1/27/2006 11:04 rchristmann@waterboards.ca.gov	Rebecca Christmann
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2/28/2005 12:43 rreinhard@mofo.com  
7/11/2006 15:55 rsams@waterboards.ca.gov  
11/14/2005 15:41 rveiga@waterboards.ca.gov  
5/30/2007 21:16 saeedtabatabaeepour@yahoo.com  
8/9/2005 19:51 sgreen@lacs.org  
9/20/2004 19:06 shcarr@san.lacity.org  
2/28/2005 17:29 shellis@lwa.com  
3/1/2005 15:07 skennedy@enfact.net  
3/28/2005 15:36 smith.davidw@epa.gov  
10/5/2000 0:00 snasserie@waterboards.ca.gov  
2/28/2005 10:33 spaulsen@flowscience.com  
2/22/2001 0:00 srubalcava@wbcounsel.com  
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3/2/2005 9:44 susanstark10@sbcglobal.net  
1/6/2005 15:15 tbilezikjian@rbf.com  
3/6/2007 8:05 tfung@dot.ca.gov  
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3/3/2005 9:08 tsmith@bonterraconsulting.com  
3/11/2005 12:43 vanessatubaces@caaprofessionals.com  
10/3/2006 11:18 vbapna@ladpw.org  
4/22/2003 0:00 vconway@lacs.org  
10/11/2006 14:13 wbotha@daley-heft.com  
12/18/2000 0:00 wcis@chevron.com  
11/18/2005 5:14 wfunderburk@sfcfirm.com  
4/4/2006 16:22 ysim@ladpw.org  
7/11/2006 7:25 zora.baharians@lacity.org

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rebecca veiga nascimento  
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seth carr  
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Sheila Kennedy  
David W. Smith  
Susana Nasserie  
Susan C. Paulsen Ph.D. P.E.  
Sharon Rubalcava  
T Scott Schales  
Susan Stark  
Tanya Bilezikjian  
Tom Fung  
Theresa Rodgers  
Thomas E Smith Jr  
Vanessa Tubaces  
Vik Bapna  
Victoria O. Conway  
Wentzelee Botha  
Wayne Ishimoto  
William Funderburk  
Youn Sim  
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10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
10/26/2000 0:00	JHunter@JLHA.Net	John Hunter
2/28/2005 16:05	JVALENTINE@CITYOFPASADENA.NET	Jim Valentine
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9/28/2006 10:58	Lee.Peterson@dailybreeze.com	Lee Peterson
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2/13/2007 9:57	deana@aquabiocleanup.com	Deana Vitela
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10/19/2006 10:35	isetziol@kpcc.org	lisa Setziol
6/30/2007 14:03	javed.hussain@veoliaes.com	Javed Hussain



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 12/7/2006 17:28 jbell@mw2h2o.com  
 3/1/2005 14:16 jbeller@san.lacity.org  
 6/2/2004 10:30 jberlin@carollo.com  
 3/18/2005 12:58 jcowan@cityofalhambra.org  
 5/9/2006 12:33 jcox@waterboards.ca.gov  
 7/22/2005 12:09 jcrisolodhs@dhs.ca.gov  
 3/3/2005 11:08 jcruz@ladpw.org  
 4/29/2003 0:00 jdfrei@stormwatergroup.com  
 4/13/2007 16:56 jfordyce@waterboards.ca.gov  
 3/1/2005 14:53 jgibson@torrnet.com  
 1/25/2006 7:47 jgully@lacsdsd.org  
 4/13/2001 0:00 jharris@rwglaw.com  
 4/24/2004 16:38 jhussain@onyxes.com  
 7/13/2005 10:08 jjensen@waterboards.ca.gov  
 4/14/2003 0:00 jmiller3@ch2m.com  
 12/19/2006 13:38 jmorton@igc.org  
 3/4/2005 9:54 jmundy@lvmwd.com  
 7/21/2005 9:10 jnewman@waterboards.ca.gov  
 4/4/2005 9:43 joe.bellas@nbcuni.com  
 10/12/2005 12:51 john.craig@tetrattech-ffx.com  
 12/19/2006 10:07 jpereira@dpw.lacounty.gov  
 7/17/2006 13:22 jpereira@ladpw.org  
 7/16/2004 13:33 jprice@waterboards.ca.gov  
 3/8/2005 10:51 jreinhardt@lvmwd.com  
 3/4/2005 12:40 jskelley@socal.rr.com  
 2/10/2003 0:00 jtorres@ci.vernon.ca.us  
 4/5/2007 16:20 justin@calcattlemen.org  
 3/3/2005 13:05 jyoshino@ci.walnut.ca.us  
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 3/15/2005 14:42 kathleen.enve@verizon.net  
 2/16/2004 11:47 kcole@wm.com  
 6/15/2006 16:08 ken.franklin@lacity.org  
 10/23/2006 16:00 kfarfsing@cityofsignalhill.org  
 3/8/2005 15:09 kharris@waterboards.ca.gov  
 3/4/2005 10:03 kimberlycolbert@caaprofessionals.com  
 2/15/2006 16:17 kjames@healthebay.org  
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 7/24/2006 11:31 kkatona@lacbos.org  
 11/28/2006 13:07 koletty@usc.edu  
 4/28/2005 13:15 kozelka.peter@epa.gov  
 3/24/2005 14:34 kprickett@portla.org  
 3/14/2007 16:53 krubin@ladwp.com  
 10/11/2005 15:34 ksusilo@geosyntec.com  
 5/22/2006 12:45 kthompson@mail.wqa.org  
 4/19/2007 9:52 kward@waterboards.ca.gov  
 3/18/2002 0:00 kweston@converseconsultants.com  
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 2/12/2007 10:18 laurie\_solis@urscorp.com  
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 Joanna Jensen  
 Judi Miller  
 Jess Morton  
 John R. Mundy  
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 Joe Bellas  
 John Craig  
 Jason Pereira  
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 Jack Price  
 Jeff Reinhardt  
 Joseph Skelley  
 Jerrick Torres  
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 Kathleen McDonnell  
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7/25/2006 15:49 scain@waterboards.ca.gov  
4/24/2003 0:00 schroederdj@cdm.com  
1/3/2006 11:39 sewers@dslextreme.com  
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7/19/2006 17:36 shanda.beltran@lw.com  
9/20/2004 19:06 shcarr@san.lacity.org  
2/28/2005 17:29 shellis@lwa.com  
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4/12/2007 11:02 sschales@ladpw.org  
1/9/2002 0:00 stovermw@ix.netcom.com  
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6/29/2006 13:34 suzanne@lasgrwc.org  
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3/6/2007 8:05 tfung@dot.ca.gov  
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3/3/2005 9:08 tsmith@bonterraconsulting.com  
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3/1/2005 9:35 winter@theriverproject.org  
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seth carr  
Shelli St.Clair  
Sheila Kennedy  
Scott Lupton  
David W. Smith  
Susana Nasserie  
Susan C. Paulsen Ph.D. P.E.  
Scott Pomrehn  
T Scott Schales  
Michael Stover  
Susannah Turney  
Susan Stark  
Suzanne Dallman  
Tanya Bilezikjian  
Tom Fung  
Tom Leary  
Theresa Rodgers  
Thomas E Smith Jr  
Vanessa Tubaces  
Victoria O. Conway  
Vanessa Hevener  
Vijay N. Desai  
Wentzelee Botha  
William Funderburk  
Melanie Winter  
Wayne Grandin  
Youn Sim  
zora Baharians

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DATE JOINED	EMAIL ADDRESS	RATE MAILED	FULL NAME
3/10/2005 10:12	DLaff@ladpw.org		Daniel J. Lafferty
10/21/2005 6:54	Gary_Garofalo@dot.ca.gov		Gary Garofalo
11/2/2005 14:00	Gerhardt.Hubner@ventura.org		Gerhardt Hubner
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com		Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov		Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com		Jeff Endicott
3/10/2006 11:22	John.Bullington@sbcglobal.net		John Bullington
1/15/2003 0:00	JohnB648@AOL.com		John Bullington
12/4/2006 13:14	Lakesidemedia@earthlink.net		Timothy Bramet
12/1/2006 11:26	Leila.Barker@lacity.org		Leila Barker
3/7/2005 14:37	MarkCapron@vrsd.com		Mark E. Capron
3/4/2005 6:57	RKUBOMO@ladpw.org		Rod Kubomoto
3/1/2005 10:40	RWPearson@aol.com		Roger W. Pearson
5/24/2006 11:56	acor@ucla.edu		Alina Corcoran
12/13/2005 9:31	adavis@rbf.com		Anne G. Davis
12/19/2005 11:22	adorablesam_4@yahoo.co.in		sam
1/3/2001 0:00	aharrington@ci.claremont.ca.us		Andrea Harrington
12/17/2005 8:28	ahell@lacsds.org		Ann Heil
3/28/2005 13:31	amarsh@pirnie.com		Anita Marsh
8/24/2006 15:29	arri@mtaonline.net		Jeffrey Davis
12/28/2004 7:34	asaponara@treadwellrollo.com		Anthony Saponara
11/15/2005 12:22	ashlic@lwa.com		Ashli Desai
3/2/2005 13:11	barbara_klos@urscorp.com		Barbara A. Klos
3/7/2005 13:11	barry.snyder@amec.com		Barry J. Snyder
2/22/2007 14:38	barvai@fuscoe.com		Bryan Arvai
2/28/2005 16:44	baykeeper@smbaykeeper.org		Tracy Egoscue
11/17/2005 11:20	bbax@lacsds.org		Beth Bax
9/10/2002 0:00	bdouglas@questaec.com		Bruce Douglas
6/1/2005 11:37	blizmo1@aol.com		Elizabeth Zlotnik
3/28/2005 15:13	boylehm@cdm.com		Heather Boyle
3/2/2005 20:04	brader@popsound.com		Brian Rader
3/30/2005 15:39	bradmilner@kennedyjenks.com		Brad Milner
3/16/2005 9:48	bteafor@ci.burbank.ca.us		Bonnie Teafor
9/20/2006 14:25	ca3@imsinfo.com		Cory R. Espinoza
5/4/2006 16:09	carla.cummings@westonsolutions.com		Carla Cummings
1/25/2006 6:35	cfcaspary@gmail.com		Charles Caspary
9/17/2003 0:00	chuck.cleeves@hdrinc.com		Chuck Cleeves
3/1/2005 7:20	cinciong@ladpw.org		Carrie Inciong
5/30/2006 12:12	clayton.yoshida@ladwp.com		Clayton Yoshida
2/28/2005 13:13	cleanwater@sfo.com		Daniel Cooper
10/4/2006 9:09	cmitchell@mbcnei.net		Charles T. Mitchell
10/1/2004 13:12	courtney.morgan@hydromail.com		Courtney Morgan
2/28/2005 15:13	cperez@newhall.com		Cris Perez
6/1/2006 8:25	csaylan@earthlink.net		charles saylan
4/5/2005 8:39	csjoberg@ladpw.org		Carl W. Sjoberg
7/17/2006 17:05	currunaga@waterboards.ca.gov		Carlos Urrunaga
3/11/2005 16:06	danflorescu@caaprofessionals.com		Dan Florescu
3/13/2007 14:10	dapt@rbf.com		Daniel Apt
3/6/2006 10:57	darrell.siegrist@ventura.org		Darrell Siegrist
1/20/2005 13:51	dave@integratedwater.com		Dave Parkinson
3/1/2005 8:57	david.thomas@ventura.org		David F. Thomas

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2/13/2007 9:57	deana@aquabiocleanup.com	Deana Vitela
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4/5/2005 9:52	fchin@ladpw.org	Frank Chin
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3/6/2007 8:05 tfung@dot.ca.gov  
4/12/2006 12:46 tmoorhouse@cleanlake.com  
3/3/2005 13:22 tnanson@simivalley.org  
7/1/2004 11:24 trodgers@waterboards.ca.gov  
3/3/2005 9:08 tsmith@bonterraconsulting.com  
3/11/2005 12:43 vanessatubaces@caaprofessionals.com  
4/22/2003 0:00 vconway@lacsds.org  
11/19/2001 0:00 waterman4u2@hotmail.com  
10/11/2006 14:13 wbotha@daley-heft.com  
11/18/2005 5:14 wfunderburk@sfcfirm.com  
3/22/2005 10:27 ysim@ladpw.org  
7/11/2006 7:25 zora.baharians@lacity.org

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Donald Schroeder  
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shanda beltran  
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Susan Nissman  
Susan C. Paulsen Ph.D. P.E.  
T Scott Schales  
Susan Stark  
Tanya Bilezikjian  
Tom Fung  
Thomas Moorhouse  
Tim Nanson  
Theresa Rodgers  
Thomas E Smith Jr  
Vanessa Tubaces  
Victoria O. Conway  
David DuVarney  
Wentzelee Botha  
William Funderburk  
Sim, Youn  
Zora Baharians



# LYRIS MAILING

LIST NAME: lyris  
 DATE MAILED: 7/2/13

DATEJOINED_	EMAILADDR_	FULLNAME_
3/10/2005 10:12	DLaff@ladpw.org	Daniel J. Lafferty
4/12/2006 8:13	Elizabeth.Laskowska@lacity.org	Elizabeth Laskowska
10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
1/15/2003 0:00	JohnB648@AOL.com	John Bullington
9/28/2006 10:58	Lee.Peterson@dailybreeze.com	Lee Peterson
12/1/2006 11:26	Leila.Barker@lacity.org	Leila Barker
3/17/2005 20:27	RES00CNI@VERIZON.NET	Irma Gallegos
3/4/2005 6:57	RKUBOMO@ladpw.org	Rod Kubomoto
3/1/2005 10:40	RWPearson@aol.com	Roger W. Pearson
4/11/2006 14:14	Wing.Tam@lacity.org	Wing Tam
5/24/2006 11:56	acor@ucla.edu	Alina Corcoran
12/13/2005 9:31	adavis@rbf.com	Anne G. Davis
12/19/2005 11:22	adorablesam_4@yahoo.co.in	sam
1/3/2001 0:00	aharrington@ci.claremont.ca.us	Andrea Harrington
12/17/2005 8:28	ahell@lacs.org	Ann Heil
3/28/2005 13:31	amarsh@pirnie.com	Anita Marsh
4/19/2006 4:26	annadbrat@yahoo.com	A Bee
8/24/2006 15:29	arri@mtaonline.net	Jeffrey Davis
12/28/2004 7:34	asaponara@treadwellrollo.com	Anthony Saponara
11/15/2005 12:22	ashlic@lwa.com	Ashli Desai
3/2/2005 13:11	barbara_klos@urscorp.com	Barbara A. Klos
3/7/2005 13:11	barry.snyder@amec.com	Barry J. Snyder
2/22/2007 14:38	barvai@fuscoe.com	Bryan Arvai
2/28/2005 16:44	baykeeper@smbaykeeper.org	Tracy Egoscue
3/28/2005 15:13	boylehm@cdm.com	Heather Boyle
3/2/2005 20:04	brader@popsound.com	Brian Rader
3/16/2005 9:48	bteaford@ci.burbank.ca.us	Bonnie Teaford
9/20/2006 14:25	ca3@imsinfo.com	Cory R. Espinoza
5/4/2006 16:09	carla.cummings@westonsolutions.com	Carla Cummings
1/25/2006 7:05	cathy.chang@culvercity.org	Cathy Chang
7/20/2006 15:30	charlie.yu@lacity.org	Charlie Yu
3/1/2005 7:20	cinciong@ladpw.org	Carrie Inciong
5/30/2006 12:12	clayton.yoshida@ladwp.com	Clayton Yoshida
2/28/2005 13:13	cleanwater@sfo.com	Daniel Cooper
10/4/2006 9:09	cmitchell@mbcnet.net	Charles T. Mitchell
10/1/2004 13:12	courtney.morgan@hydromail.com	Courtney Morgan
6/1/2006 8:25	csaylan@earthlink.net	charles saylan
4/5/2005 8:39	csjoberg@ladpw.org	Carl W. Sjoberg
7/17/2006 17:05	currunaga@waterboards.ca.gov	Carlos Urrunaga
3/11/2005 16:06	danflorescu@caaprofessionals.com	Dan Florescu
3/13/2007 14:10	dapt@rbf.com	Daniel Apt
1/20/2005 13:51	dave@integratedwater.com	Dave Parkinson
3/4/2005 14:24	dburhenn@burhennigest.com	Dave Burhenn
2/13/2007 9:57	deana@aquabiocleanup.com	Deana Vitela
7/6/2006 13:30	dfox@treepeople.org	Debbie Edgar Fox
5/17/2001 0:00	djwri@hotmail.com	Dan Wright
3/17/2006 14:34	donna.chen@lacity.org	Donna Chen

11/26/2003 0:00 dwebster@calrestrats.com  
 2/28/2005 9:05 earl.lapensee@rcslade.com  
 9/12/2006 14:36 ewu@waterboards.ca.gov  
 4/5/2005 9:52 fchin@ladpw.org  
 3/3/2005 15:51 fleming.terrence@epa.gov  
 8/6/2002 0:00 gary.wortham@tetrattech.com  
 10/5/2006 10:00 ggreene@downeyca.org  
 10/12/2005 15:50 gmarsh@waterboards.ca.gov  
 12/22/2006 8:49 gregory.savitske@tetrattech-ffx.com  
 10/9/2002 0:00 griset@scag.ca.gov  
 1/16/2007 8:05 gvillarreal@rbf.com  
 10/24/2005 11:59 gwlaforge@aei-casc.com  
 3/2/2005 16:00 hashimoto.janet@epa.gov  
 4/25/2006 14:31 hgallardy@ladpw.org  
 6/22/2007 18:29 hgest@burhennest.com  
 8/14/2006 17:08 hiiho@sbcglobal.net  
 11/17/2005 11:07 houstgrp@pacbell.net  
 3/1/2005 14:16 jbeller@san.lacity.org  
 5/9/2006 12:33 jcox@waterboards.ca.gov  
 7/22/2005 12:09 jcrisololo@dhs.ca.gov  
 3/3/2005 11:08 jcruz@ladpw.org  
 4/13/2007 16:56 jfordyce@waterboards.ca.gov  
 1/25/2006 7:47 jgully@lacsd.org  
 4/24/2004 16:38 jhussain@onyxes.com  
 7/13/2005 13:28 jjensen@waterboards.ca.gov  
 7/21/2005 9:10 jnewman@waterboards.ca.gov  
 7/17/2006 13:22 jpereira@ladpw.org  
 3/4/2005 12:40 jskelley@socal.rr.com  
 4/5/2007 16:20 justin@calcattlemen.org  
 3/1/2005 16:51 kamcdonnell@mactec.com  
 3/15/2005 14:42 kathleen.enve@verizon.net  
 6/15/2006 16:08 ken.franklin@lacity.org  
 10/23/2006 16:00 kfarfsing@cityofsignalhill.org  
 3/8/2005 15:09 kharris@waterboards.ca.gov  
 2/15/2006 16:17 kjames@healthebay.org  
 6/22/2004 12:29 kjones@dot.ca.gov  
 11/28/2006 13:07 koletty@usc.edu  
 4/28/2005 13:15 kozelka.peter@epa.gov  
 3/24/2005 14:34 kprickett@portla.org  
 3/14/2007 16:53 krubin@ladwp.com  
 10/11/2005 15:34 ksusilo@geosyntec.com  
 5/22/2006 12:45 kthompson@mail.wqa.org  
 4/19/2007 9:52 kward@waterboards.ca.gov  
 3/20/2002 0:00 kwf@san.lacity.org  
 2/12/2007 10:18 laurie\_solis@urscorp.com  
 9/29/2005 10:09 laustin@geosyntec.com  
 12/20/2006 15:37 leo@wecklabs.com  
 2/7/2001 0:00 lisa.williams@lsa-assoc.com  
 4/2/2004 13:13 llarsen@rbf.com  
 1/19/2005 10:42 lmartinez@biasec.org  
 10/4/2006 15:48 lnye@waterboards.ca.gov  
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 Gary W. LaForge  
 Janet Hashimoto  
 Heather Gallardy  
 Howard Gest  
 Barry Silver  
 Laura Cottrell  
 Jeffrey Beller  
 Joanne Cox  
 Joseph Crisologo  
 Jemellee Cruz  
 Jennifer Fordyce  
 Joseph R. Gully  
 Javed Hussain  
 Joanna Jensen  
 Jenny Newman  
 Jason Pereira  
 Joseph Skelley  
 Justin Oldfield  
 Kathleen McDonnell  
 Kathleen McGowan  
 Kenneth Franklin  
 Kenneth C. Farfsing  
 Ken Harris  
 Kirsten James  
 Keith Jones  
 Stephen Koletty PhD  
 Peter Kozelka  
 Kat Prickett  
 Katherine Rubin  
 Ken Susilo  
 Kelley Thompson  
 Kim Ward  
 Kris Flaig  
 Laurie Solis  
 Lisa Austin  
 Leo Raab  
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 Laura Larsen  
 Lisa Martinez  
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10/18/2005 9:54 mbaker@crglabs.com  
1/4/2006 11:50 mbearzi@earthlink.net  
7/11/2006 16:12 mcohen@rwglaw.com  
3/28/2005 15:37 mgold@healthebay.org  
3/3/2005 10:09 mlcoffee@nossaman.com  
7/12/2006 16:22 mlevy@waterboards.ca.gov  
1/25/2006 18:01 mpestrel@ladpw.org  
3/26/2007 14:40 mpeterson@kpcc.org  
4/4/2007 9:11 mpf@stateside.com  
3/4/2005 14:59 mrnolan@socal.rr.com  
9/23/2004 12:04 mtaylor@bna.com  
10/25/2006 11:03 oac06\_07@yahoo.com  
10/24/2005 11:14 pgouveia@waterboards.ca.gov  
8/16/2005 14:27 pmcgaw@archernorris.com  
2/24/2006 12:06 powerskj@yahoo.com  
1/27/2006 11:04 rchristmann@waterboards.ca.gov  
9/23/2005 9:31 rez1@earthlink.net  
4/28/2006 8:51 richard.a.haimann@mwhglobal.com  
5/10/2007 10:06 rob.osborne@redondo.org  
8/15/2002 0:00 robert\_wu@dot.ca.gov  
2/28/2005 12:43 rreinhard@mofo.com  
7/11/2006 15:55 rsams@waterboards.ca.gov  
8/23/2006 23:14 service@popeyespumpout.com  
1/3/2006 11:39 sewers@dslextreme.com  
8/9/2005 19:51 sgreen@lacsds.org  
7/19/2006 17:36 shanda.beltran@lw.com  
9/20/2004 19:06 shcarr@san.lacity.org  
2/28/2005 17:29 shellis@lwa.com  
3/1/2005 15:07 skennedy@enfact.net  
3/28/2005 15:36 smith.davidw@epa.gov  
10/5/2000 0:00 snasserie@waterboards.ca.gov  
2/28/2005 10:33 spaulsen@flowscience.com  
4/12/2007 11:02 sschales@ladpw.org  
3/2/2005 9:44 susan Stark10@sbcglobal.net  
1/6/2005 15:15 tbilezikjian@rbf.com  
3/6/2007 8:05 tfung@dot.ca.gov  
7/1/2004 11:26 trodgers@waterboards.ca.gov  
3/11/2005 12:43 vanessatubaces@caaprofessionals.com  
4/22/2003 0:00 vconway@lacsds.org  
10/19/2005 14:45 vndesai@san.lacity.org  
10/11/2006 14:13 wbotha@daley-heft.com  
12/18/2000 0:00 wcis@chevron.com  
11/18/2005 5:14 wfunderburk@sfcfirm.com  
4/4/2006 16:22 ysim@ladpw.org  
7/11/2006 7:25 zora.baharians@lacity.org

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Mark Gold  
Mary Lynn Coffee  
Michael Levy  
Mark Pestrella  
Molly Peterson  
Melissa Patra Farmer  
Nolan Farkas  
Matthew Taylor  
Dillon Henry  
Patricia Gouveia  
Peter W. McGaw  
Kevin Powers  
Rebecca Christmann  
David Reznick  
Richard Haimann  
Rob Osborne  
Bob Wu  
Robert Reinhard  
Robert Sams  
Dan Maze  
Anna Sklar  
Sharon N. Green  
shanda beltran  
seth carr  
Shelli St.Clair  
Sheila Kennedy  
David W. Smith  
Susana Nasserie  
Susan C. Paulsen Ph.D. P.E.  
T Scott Schales  
Susan Stark  
Tanya Bilezikjian  
Tom Fung  
Theresa Rodgers  
Vanessa Tubaces  
Victoria O. Conway  
Vijay N. Desai  
Wentzelee Botha  
Wayne Ishimoto  
William Funderburk  
Youn Sim  
Zora Baharians



LYRIS MAILING

LIST NAME: San Gabriel  
 DATE MAILED: 7/2/07

DATEJOINED_	EMAILADDR_	FULLNAME_
4/21/2005 9:30	CRoberts@aaeinc.com	Cory Roberts
3/10/2005 10:12	DLaff@ladpw.org	Daniel J. Lafferty
10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
1/15/2003 0:00	JohnB648@AOL.com	John Bullington
2/16/2006 15:14	JohnH@ci.brea.ca.us	John Hogan
12/1/2006 11:26	Leila.Barker@lacity.org	Leila Barker
2/16/2006 15:14	Npaproski@anaheim.net	Nicole Paproski
3/4/2005 6:57	RKUBOMO@ladpw.org	Rod Kubomoto
3/1/2005 10:40	RWPearson@aol.com	Roger W. Pearson
2/16/2006 15:18	RonB@ci.fullerton.ca.us	Ron Bowers
6/14/2006 16:34	TobyMoore@gswater.com	Toby Moore
12/13/2005 9:31	adavis@rbf.com	Anne G. Davis
12/19/2005 11:22	adorablesam_4@yahoo.co.in	sam
1/3/2001 0:00	aharrington@ci.claremont.ca.us	Andrea Harrington
8/2/2002 0:00	ahell@lacsds.org	Ann Heil
8/6/2003 0:00	akiko.kawaguchi@mwhglobal.com	Akiko Kawaguchi
3/28/2005 13:31	amarsh@pirnie.com	Anita Marsh
8/24/2006 15:29	arri@mtaonline.net	Jeffrey Davis
12/28/2004 7:34	asaponara@treadwellrollo.com	Anthony Saponara
11/15/2005 12:22	ashlic@lwa.com	Ashli Desai
12/19/2006 10:11	asteele@lacsds.org	Alex Steele
3/2/2005 13:11	barbara_klos@urscorp.com	Barbara A. Klos
3/7/2005 13:11	barry.snyder@amec.com	Barry J. Snyder
2/22/2007 14:38	barvai@fuscoe.com	Bryan Arvai
2/28/2005 16:44	baykeeper@smbaykeeper.org	Tracy Egoscue
11/17/2005 11:20	bbax@lacsds.org	Beth Bax
3/1/2005 14:50	biniguez@bellflower.org	Bernardo Iniguez
2/16/2006 15:16	bkelly@buenapark.com	Brian Kelly
3/1/2005 11:07	bmichaelis@ci.san-dimas.ca.us	Blaine Michaelis
6/14/2006 10:23	bogorman@gswater.com	Brandy O'Gorman
3/28/2005 15:13	boylehm@cdm.com	Heather Boyle
3/16/2005 9:48	bteaford@ci.burbank.ca.us	Bonnie Teaford
9/20/2006 14:25	ca3@imsinfo.com	Cory R. Espinoza
3/2/2005 7:13	canderson@ci.azusa.ca.us	Chet F. Anderson
5/4/2006 16:09	carla.cummings@westonsolutions.com	Carla Cummings
7/20/2006 15:30	charlie.yu@lacity.org	Charlie Yu
12/19/2006 12:44	chichen@ladpw.org	Chien-hao Chen
2/16/2006 15:24	chris.crompton@rdmd.ocgov.com	Chris Crompton
6/4/2002 0:00	chris@hydrologue.com	Chris D'sa
9/17/2003 0:00	chuck.cleeves@hdrinc.com	Chuck Cleeves
3/1/2005 7:20	cinciong@ladpw.org	Carrie Inciong
5/30/2006 12:12	clayton.yoshida@ladwp.com	Clayton Yoshida
2/28/2005 13:13	cleanwater@sfo.com	Daniel Cooper
10/4/2006 9:09	cmitchell@mbcnet.net	Charles T. Mitchell
10/1/2004 13:12	courtney.morgan@hydromail.com	Courtney Morgan
2/28/2005 15:13	cperez@newhall.com	Cris Perez
4/5/2005 8:39	csjoberg@ladpw.org	Carl W. Sjoberg



7/17/2006 17:05 currunaga@waterboards.ca.gov  
3/11/2005 16:06 danflorescu@caaprofessionals.com  
3/13/2007 14:10 dapt@rbf.com  
1/20/2005 13:51 dave@integratedwater.com  
2/19/2004 14:05 dbechtold@targheeinc.com  
2/16/2006 15:15 dbrodowski@buenapark.com  
3/4/2005 14:24 dburhenn@burhenngest.com  
6/25/2004 12:47 dchen@san.lacity.org  
2/13/2007 9:57 deana@aquabiocleanup.com  
7/6/2006 13:30 dfox@treepeople.org  
9/23/2005 9:12 dnarrieta@aol.com  
3/17/2006 14:34 donna.chen@lacity.org  
3/3/2006 14:42 donna.toy.chen@lacity.org  
11/26/2003 0:00 dwebster@calrestrats.com  
2/28/2005 9:05 earl.lapensee@rcslade.com  
2/16/2006 15:21 edelatorre@placentia.org  
1/20/2003 0:00 eileent@migcom.com  
4/3/2002 0:00 ekiepke@willdan.com  
9/12/2006 14:36 ewu@waterboards.ca.gov  
4/5/2005 9:52 fchin@ladpw.org  
3/29/2005 16:00 fddryden@juno.com  
3/3/2005 15:51 fleming.terrence@epa.gov  
8/6/2002 0:00 gary.wortham@tetrattech.com  
11/26/2002 0:00 ggrene@downeyca.org  
3/9/2005 10:45 ghildeb@ladpw.org  
1/22/2002 0:00 gilw@lwa.com  
2/28/2005 12:50 glinkletter@environcorp.com  
10/12/2005 15:50 gmarsh@waterboards.ca.gov  
9/14/2006 13:40 gmusejr@mwdh2o.com  
12/22/2006 8:49 gregory.savitske@tetrattech-ffx.com  
10/9/2002 0:00 griset@scag.ca.gov  
2/16/2006 15:16 gvazquez@ci.cypress.ca.us  
1/16/2007 8:05 gvillarreal@rbf.com  
10/24/2005 11:59 gwlaforge@aei-casc.com  
3/2/2005 16:00 hashimoto.janet@epa.gov  
4/25/2006 14:31 hgallardy@ladpw.org  
6/22/2007 18:29 hgest@burhenngest.com  
11/17/2005 11:07 houstgrp@pacbell.net  
2/16/2006 15:23 hweldon@yorba-linda.org  
8/6/2002 0:00 ian@fuscoe.com  
10/19/2006 10:35 isetziol@kpcc.org  
2/16/2006 15:20 ismilen@cityoflapalma.org  
6/30/2007 14:03 javed.hussain@veoliaes.com  
2/3/2002 0:00 javiergcardenas@hotmail.com  
12/7/2006 17:28 jbell@mwdh2o.com  
3/1/2005 14:16 jbeller@san.lacity.org  
8/18/2004 15:31 jccarmody2002@yahoo.com  
5/9/2006 12:33 jcox@waterboards.ca.gov  
7/22/2005 12:09 jcrisololo@dhs.ca.gov  
3/3/2005 11:08 jcruz@ladpw.org  
4/13/2007 16:56 jfordyce@waterboards.ca.gov  
1/25/2006 7:47 jgully@lacsds.org

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Debbie Edgar Fox  
David Arrieta  
Donna Chen  
Donna Chen  
Debbie Webster  
Earl LaPensee  
Eduardo DeLaTorre  
Eileen Takata  
Elroy Kiepke  
Eric Wu  
Frank Chin  
Franklin D. Dryden  
Terrence Fleming  
Gary Wortham  
Gerry Greene  
Gary Hildebrand  
Gil Wheeler  
Dr. George O. Linkletter  
Glenda Marsh  
George W. Muse Jr.  
Gregory Savitske  
Daniel E. Griset  
Gonzalo Vazquez  
Gian Villarreal  
Gary W. LaForge  
Janet Hashimoto  
Heather Gallardy  
Howard Gest  
Laura Cottrell  
Howard Weldon  
Ian Adam  
Ilsa Setziol  
Ismile Noorbaksh  
Javed Hussain  
Javier G. Cardenas  
Janet Bell  
Jeffrey Beller  
John Carmody  
Joanne Cox  
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Jennifer Fordyce  
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 7/13/2005 13:26 jjensen@waterboards.ca.gov  
 12/19/2006 13:38 jmorton@igc.org  
 7/21/2005 9:10 jnewman@waterboards.ca.gov  
 12/19/2006 10:07 jpereira@dpw.lacounty.gov  
 7/17/2006 13:22 jpereira@ladpw.org  
 2/16/2006 15:21 jpoole@ci.los-alamitos.ca.us  
 3/1/2005 15:07 jranells@ci.la-verne.ca.us  
 4/5/2007 16:20 justin@calcattlemen.org  
 3/3/2005 13:05 jyoshino@ci.walnut.ca.us  
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 2/16/2006 15:17 kdadbeh@ci.cypress.ca.us  
 5/26/2005 18:31 keolanuis@scfuels.com  
 10/23/2006 16:00 kfarfsing@cityofsignalhill.org  
 3/8/2005 15:09 kharris@waterboards.ca.gov  
 3/4/2005 10:03 kimberlycolbert@caaprofessionals.com  
 2/15/2006 16:17 kjames@healthebay.org  
 6/22/2004 12:29 kjones@dot.ca.gov  
 3/3/2005 9:18 kkeeling@bonterraconsulting.com  
 2/16/2006 15:14 klinker@anaheim.net  
 11/28/2006 13:07 koletty@usc.edu  
 4/28/2005 13:15 kozelka.peter@epa.gov  
 3/14/2007 16:53 krubin@ladwp.com  
 10/11/2005 15:34 ksusilo@geosyntec.com  
 5/22/2006 12:45 kthompson@mail.wqa.org  
 9/19/2006 16:26 kvivanti@lakewoodcity.org  
 3/20/2002 0:00 kwf@san.lacity.org  
 3/28/2006 15:20 kwong@semprautilities.com  
 3/8/2005 7:43 lance.baroldi@claytonindustries.com  
 2/16/2006 15:20 larryb@cityoflapalma.org  
 2/12/2007 10:18 laurie\_solis@urscorp.com  
 9/29/2005 10:09 laustin@geosyntec.com  
 12/20/2006 15:37 leo@wecklabs.com  
 10/16/2000 0:00 limalms@ci.long-beach.ca.us  
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 3/24/2004 11:19 llarsen@rbf.com  
 1/19/2005 10:42 lmartinez@biasec.org  
 10/4/2006 15:48 lnye@waterboards.ca.gov  
 2/28/2005 11:12 lorettac@ci.irwindale.ca.us  
 6/8/2005 15:05 lwarios@hotmail.com  
 3/17/2005 14:19 mariki@ladpw.org  
 1/18/2002 0:00 marym@water.ca.gov  
 3/2/2005 14:40 matt\_lyons@lbwater.org  
 10/18/2005 9:54 mbaker@crglabs.com  
 1/4/2006 11:50 mbearzi@earthlink.net  
 7/11/2006 16:12 mcohen@rwglaw.com  
 3/18/2002 0:00 mgagan@rosekindel.com  
 3/28/2005 15:37 mgold@healthebay.org  
 1/14/2002 0:00 michael@hulsenv.com

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 Karen Turney  
 Kathleen McGowan  
 Kamran Dadbeh  
 Stan Keolanui  
 Kenneth C. Farfsing  
 Ken Harris  
 Kimberly Colbert  
 Kirsten James  
 Keith Jones  
 Kristin Keeling  
 Keith Linker  
 Stephen Koletty PhD  
 Peter Kozelka  
 Katherine Rubin  
 Ken Susilo  
 Kelley Thompson  
 Konya Vivanti  
 Kris Flaig  
 Karen Wong  
 Lance Baroldi  
 Larry Baldwin  
 laurie solis  
 Lisa Austin  
 Leo Raab  
 Lisa Malmsten  
 Lisa Carlson  
 Lisa Williams  
 Laura Larsen  
 Lisa Martinez  
 L. B. Nye  
 Loretta Corpis  
 Lisa Larios  
 Menerva Ariki  
 Mary M. Miller  
 Matt Lyons  
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12/1/2006 2:38	mstevens@kinneticlabs.com	Marty Stevenson
9/23/2004 12:04	mtaylor@bna.com	Matthew Taylor
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12/19/2006 12:43	neal.shapiro@smgov.net	Neal Shapiro
10/25/2006 11:03	oac06_07@yahoo.com	Dillon Henry
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8/16/2005 14:27	pmcgaw@archernorris.com	Peter W. McGaw
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10/17/2000 0:00	randy@wqa.com	Randy Schoellerman
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12/19/2006 10:05	rjgomez@ladpw.org	Robert Gomez
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3/4/2005 11:50	rmontevideo@rutan.com	Richard Montevideo
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3/16/2002 0:00	rstewart3@earthlink.net	Peggy Stewart
2/16/2006 15:25	ruby.maldonado@rdmd.ocgov.com	Ruby Maldonado
5/30/2007 21:16	saeedatabaeeepour@yahoo.com	Saeed Tabatabaeeepour
2/28/2005 16:10	sarinamoraleschoate@santafesprings.org	Sarina Morales-Choate
3/7/2005 11:28	sbroten@icfconsulting.com	Scott Broten
2/16/2006 15:26	scott.jakubowski@rdmd.ocgov.com	Scott D. Jakubowski
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5/23/2002 0:00	sgreen@lacsds.org	Sharon Green
3/26/2002 0:00	sharris@lakewoodcity.org	Lisa Ann Rapp
2/28/2005 17:29	shellis@lwa.com	Shelli St.Clair
10/10/2002 0:00	sloriso@rkacivil.com	Steve Loriso
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2/3/2004 16:07	smonk@cdpr.ca.gov	Steven Monk
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2/28/2005 10:33	spaulsen@flowscience.com	Susan C. Paulsen Ph.D. P.E.
6/6/2005 15:06	spomrehn@lakewoodcity.org	Scott Pomrehn
4/12/2007 11:02	sschales@ladpw.org	T Scott Schales
2/14/2006 15:56	steven.maghy@aes.com	Steven Maghy
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2/14/2006 15:57 susan.damron@ladwp.com  
3/2/2005 9:44 susanstark10@sbcglobal.net  
6/29/2006 13:34 suzanne@lasgrwc.org  
2/10/2005 13:59 tbell@bgsgroup.net  
1/6/2005 15:15 tbilezikjian@rbf.com  
3/6/2007 8:05 tfung@dot.ca.gov  
3/2/2005 11:01 toleary@longbeach.gov  
10/5/2000 0:00 trodgers@waterboards.ca.gov  
3/3/2005 9:08 tsmith@bonterraconsulting.com  
3/11/2005 12:43 vanessatubaces@caaprofessionals.com  
4/22/2003 0:00 vconway@lacsdsd.org  
10/11/2006 14:13 wbotha@daley-heft.com  
11/18/2005 5:14 wfunderburk@sfcfirm.com  
10/6/2002 0:00 wtgrandin@aol.com  
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7/11/2006 7:25 zora.baharians@lacity.org

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Thomas E Smith Jr  
Vanessa Tubaces  
Victoria O. Conway  
Wentzelee Botha  
William Funderburk  
Wayne Grandin  
Youn Sim  
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10/21/2005 6:54	Gary_Garofalo@dot.ca.gov	Gary Garofalo
11/2/2005 14:00	Gerhardt.Hubner@ventura.org	Gerhardt Hubner
2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
1/15/2003 0:00	JohnB648@AOL.com	John Bullington
3/7/2005 14:37	MarkCapron@vrsd.com	Mark E. Capron
6/15/2006 8:34	Martin.Hernandez@ventura.org	Martin Hernandez
3/11/2005 10:39	Melinda.Talent@ventura.org	Melinda Talent
3/4/2005 10:47	Nancy.Settle@Ventura.Org	Nancy Settle
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2/28/2005 15:13	cperez@newhall.com	Cris Perez
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3/1/2005 14:22	ddavis@ci.ventura.ca.us	Don Davis
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10/26/2005 10:31	gordon@kimballengineering.com	Gordon Kimball
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1/16/2007 8:05	gvillarreal@rbf.com	Gian Villarreal
10/24/2005 11:59	gwiaforge@aei-casc.com	Gary W. LaForge
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 8/16/2004 18:00 mshields@unitedwater.org  
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 5/9/2006 13:52 pjenkin@sbcglobal.net  
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 2/24/2006 12:06 powerskj@yahoo.com  
 4/28/2006 10:26 pvcwd.agwater@verizon.net  
 11/20/2000 0:00 pwjkelly@mx.ci.thousand-oaks.ca.us  
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 laurie solis  
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 Linda Johnson Senator Runner 17th District  
 Lisa Williams  
 Laura Larsen  
 Lisa Martinez  
 L. B. Nye  
 Loretta Corpis  
 Larry W. Alexander  
 Lisa Larios  
 Menerva Ariki  
 Mark Pumford  
 Mary M. Miller  
 Mark D. Baker  
 Mike Barminski  
 Matthew Cohen  
 Mark Gold  
 Mary Lynn Coffee  
 Mary Lou Cotton  
 Michael Levy  
 Mark Pestrella  
 Molly Peterson  
 Melissa Patra Farmer  
 Melissa Poole  
 Nolan Farkas  
 Michael J. Shields  
 Mark Subbotin  
 Man Voong  
 Mark Zirbel  
 Nancy Fox-Fernandez  
 Dillon Henry  
 Oliver Cramer  
 Patrick J. Kelley  
 Patricia Quill  
 Paul Tantet  
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11/14/2005 15:41 rveiga@waterboards.ca.gov  
3/20/2001 0:00 ryoung@bwslaw.com  
3/13/2005 18:15 sbrower@gسالaw.com  
3/10/2005 11:15 scottquady@vrscd.com  
7/5/2006 9:33 sferrara@trcsolutions.com  
5/23/2002 0:00 sgreen@lacscl.org  
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2/28/2005 10:33 spaulsen@flowscience.com  
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4/21/2006 14:38 ssriboonlue@pirnie.com  
3/2/2005 9:44 susanstar10@sbcglobal.net  
1/6/2005 15:15 tbilezikjian@rbf.com  
3/6/2007 8:05 tfung@dot.ca.gov  
8/27/2004 16:17 flange@santa-clarita.com  
4/12/2006 12:46 tmoorhouse@cleanlake.com  
2/28/2005 12:53 trak@trakenviro.com  
10/5/2000 0:00 trodgers@waterboards.ca.gov  
3/3/2005 9:08 tsmith@bonterraconsulting.com  
3/24/2005 14:57 ummorow127@yahoo.com  
3/11/2005 12:43 vanessatubaces@caaprofessionals.com  
4/22/2003 0:00 vconway@lacscl.org  
10/26/2005 11:04 vlhaller@aol.com  
7/20/2001 0:00 vwatt@parks.ca.gov  
3/1/2005 14:31 wbobkiewicz@ci.santa-paula.ca.us  
10/11/2006 14:13 wbotha@daley-heft.com  
11/18/2005 5:14 wfunderburk@sfcfirm.com  
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4/4/2006 16:22 ysim@ladpw.org  
7/11/2006 7:25 zora.baharians@lacity.org

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rebecca veiga nascimento  
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Shelli St.Clair  
Steve McClary  
David W. Smith  
Susana Nasserie  
Susan C. Paulsen Ph.D. P.E.  
Sam Rojas  
T Scott Schales  
Sarina Sriboonlue  
Susan Stark  
Tanya Bilezikjian  
Tom Fung  
Travis Lange  
Thomas Moorhouse  
Bradford S. Newman  
Theresa Rodgers  
Thomas E Smith Jr  
Andrew Amorao  
Vanessa Tubaces  
Victoria O. Conway  
Verne Haller  
Valerie Watt  
Wally Bobkiewicz  
Wentzelee Botha  
William Funderburk  
Yanchi Chu  
Youn Sim  
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3/10/2005 10:12	DLaff@ladpw.org	Daniel J. Lafferty
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2/11/2007 18:35	Give.Me.Your.Junk@hotmail.com	Junk Mail
5/31/2005 14:57	Ivan.Karnezis@dot.ca.gov	Ivan Karnezis
12/1/2004 14:54	JEndicott@aei-casc.com	Jeff Endicott
3/10/2006 11:22	John.Bullington@sbcglobal.net	John Bullington
1/15/2003 0:00	JohnB648@AOL.com	John Bullington
9/28/2006 10:58	Lee.Peterson@dailybreeze.com	Lee Peterson
12/1/2006 11:26	Leila.Barker@lacity.org	Leila Barker
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3/17/2005 20:27	RES0OCNI@VERIZON.NET	Irma Gallegos
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2/20/2007 12:44	Rhiannon.Pregitzer@pepperdine.edu	Rhiannon Pregitzer
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# California Regional Water Quality Control Board

## Los Angeles Region



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Arnold Schwarzenegger  
Governor

July 20, 2007

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Assistant Deputy Director  
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### COUNTY OF LOS ANGELES REQUEST FOR SUBMITTAL OF EVIDENCE ON THE PROPOSED REOPENING OF THE COUNTY OF LOS ANGELES MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT (NPDES PERMIT NO. CAS004001)

Dear Mr. Pestrella:

In your comment letter dated June 25, 2007, you requested that Regional Board staff bring the following documents to the hearing and include them in "the administrative record." The following documents are in the administrative record and will be brought to the hearing per your request:

1. Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial Total Maximum Daily Load Dry- and Wet-Weather Implementation Plan.
2. Mothers' Beach and Back Basins Bacteria TMDL Nonpoint Source Study.
3. EPA memorandum, dated November 22, 2002, entitled, Establishing Total Maximum Daily Load (TMDL) Wasteload Allocations (WLAs) for Storm Water Sources and NPDES Permit Requirements Based on Those WLAs.
4. Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities (State Water Resources Control Board Panel of Experts, June 2006).

The following documents are not in the administrative record:

1. Colford, J. M., T. Wade, K. Schiff, C. Wright, J. Griffith, S. Sandhu, and S. Weisberg (2005), Recreational Water Contact and Illness in Mission Bay, California, Southern California Coastal Water Research Project, Technical Report 449.
2. Lee, C. M., T. Lin, C. Lin, G. A. Kohbodi, A. Bhatt, R. Lee, J. A. Jay (2006), Sediments as a Reservoir for Fecal Indicators Bacteria at Three Santa Monica Bay Beaches, Water Research.
3. Noble, R. T., Griffith, J. F., Blackwood, A. D., Fuhrman, J. A. Gregory, J. B. Hernandez, X., Liang, X., Bera, A. A., and Schiff, K., Multitiered Approach Using Quantitative PCR to



Track Sources of Fecal Pollution Affecting Santa Monica Bay, California. Applied and Environmental Microbiology (February 2006).

4. Ishii, S., Hansen, D. L. Hicks, R. E., Sadowsky, M. J., Beach Sand and Sediments are Temporal Sinks and Sources of Echerichia Coli in Lake Superior Environ. Science Technology. 41 (7). Web Release Date: March 1, 2007.

As set forth in the hearing notice, the deadline to submit evidence was June 25, 2007. Please provide both an explanation as to why the documents were not timely submitted, and an offer of proof about what each is intended to establish if the Regional Board were to admit it. Please provide this information by July 26, 2007.

Finally, as to the letter dated May 31, 2007 from the Santa Monica Baykeeper and NRDC to the County of Los Angeles and the City of Malibu, while the Regional Board staff received a copy of the letter, it was received after this reopening was proposed, is not a part of this administrative record, and we do not believe it to be relevant to this proceeding. Nevertheless, you may submit an offer of proof for this letter, as described above, and we will consider your request further.

Sincerely,



Deborah J. Smith  
Interim Executive Officer

cc: Mr. Michael Levy Esq., Office of Chief Counsel, State Water Resources Control Board  
Mr. David E. Janssen, Chief Administrative Officer, County of Los Angeles





# California Regional Water Quality Control Board

## Los Angeles Region



Arda S. Adams  
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

July 23, 2007

Howard Gest  
Burhenn & Gest LLP  
624 South Grand Avenue, Suite 2200  
Los Angeles, California 90017

### PROPOSED REOPENING OF THE COUNTY OF LOS ANGELES MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT (NPDES PERMIT NO. CAS004001)

Dear Mr. Gest:

Regional Board staff is in receipt of your letter dated June 20, 2007, submitted on behalf of the County of Los Angeles and the Los Angeles County Flood Control District (collectively, the "County"). At the outset, the Regional Board reiterates the limited scope of the proceeding before the Board. Neither the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL (MDRH TMDL), nor the water quality standards that it implements, are before the Board. The only issues are, consistent with the requirements of the previously adopted TMDL, and 40 CFR 122.44(d)(1)(vii)(B), when and how the provisions of the TMDL should be incorporated into the existing permit. As you know, the Board already incorporated essentially identical provisions into the MS4 permit last September when it incorporated the summer dry weather waste load allocations from the Santa Monica Bay Beaches Dry Weather Bacteria TMDL (SMBBB TMDL). The MDRH TMDL includes similar conditions, assumptions, and requirements, and of course, Marina del Rey is a subwatershed of the Santa Monica Bay watershed. Thus, the key question is whether the Board should treat this subwatershed of Santa Monica Bay differently than the remainder of Santa Monica Bay. Each of your objections is responded to in turn, below.

Nature of Hearing. As noted in the May 11, 2007 hearing notice, the hearing will be quasi-judicative, pursuant to the regulations set forth at title 23 of the California Code of Regulations, sections 648 et seq., and all other applicable authorities.

Process. The County will be allocated one hour to present every aspect of its case. The County may allocate that time as it wishes, including opening and closing statements, presentation of evidence, examination and cross-examination of witnesses, and presenting any motions it chooses to make.

Time for the County's Presentation. The hearing notice specified that the parties are invited to contact staff not later than June 28, 2007 to discuss how much time they believe is necessary for their presentations, and that staff would endeavor to accommodate reasonable requests. Staff received no timely communication or request from the County in this regard. On July 11, 2007, however, Mr. Mark Pestrella, Assistant Deputy Director of the Department of Public Works, advised the Regional Board that the County would probably ask for an hour, but would only need about 15 minutes. The Regional Board received only two comment letters, exclusive

of the letter to which this responds. Those were from the County of Los Angeles and a joint letter from Santa Monica Baykeeper and Heal the Bay. Based upon the issues under consideration by the Regional Board, and the scope of comments submitted, the County will be allocated one hour. We are confident that the County can adequately present its case in that time. You have not set forth a basis for your objection to a time limit on the County's presentation. Fairness to the public and to other stakeholders, and the orderly administration of the Board's business, requires that reasonable limits be placed to ensure that all can fairly participate.

Cross-examination. The County is free to present its evidence through witness statements and presentations, rather than through a question and answer examination of its witnesses. As noted above, within its allocated time, the County may cross-examine whichever of the witnesses that it chooses.

Administrative Record. As the Court of Appeal recently ruled in *County of Los Angeles v. Los Angeles Regional Water Quality Control Board*, the Regional Board is presumed to have reviewed the record. The Regional Board adopted the MS4 Permit, the SMBBB TMDL, the revisions last September to incorporate the SMBBB TMDL into the MS4 Permit, and the MDRH TMDL. The records from those proceedings are extensive, and no utility is served in transporting each document into the hearing room. Contrary to your suggestion, each and every document need not be handed to each Board Member for individual identification and consideration during the hearing.

The proposed findings of fact and proposed order have been publicly available for some time, and both the County and the Regional Board are well aware of the contents of the record, and the materials that support the proposed action. All of the records have been made available for public inspection, as noted in the May 11, 2007 hearing notice. We note that the County has not chosen to review the Regional Board's records as of the date of this letter. Of course, most of those documents are already in your possession both in your litigation file relating to the above-referenced court decision, and your clients' Storm Water permitting, monitoring, and compliance files, which make up a large percentage of the relevant documents.

Requests for Documents Not Included in the Agenda Package. Your suggestion that you have inadequate time to designate documents because the contents of the agenda package have not yet been identified is incorrect. Nothing in the hearing notice precludes you from identifying documents prior to the time the agenda package is prepared and circulated. You have had from May 11, 2007 to the present (indeed, until five days before the hearing) to review the record and identify the documents upon which you wish to rely. The fact that the documents in the agenda package will already be at the hearing, and therefore need not be separately requested, does not prejudice your evaluation of the documents upon which you wish to rely. As you know, the agenda package consists of the materials most relevant to an educated understanding of the proposed action. Both the limited scope of the issues presently before the Board, and the volume of the documents in the administrative record, make infeasible and unnecessary the duplication all of the administrative record's documents for each Board member, stakeholder, and member of the interested public, not to mention a waste of time, resources, and for that matter, paper. The specific documents to be included in the agenda



package are not identified in the hearing notice because the decision as to whether any particular document should be included often depends upon the comments received, requests of Board Members, and staff judgment about what materials are appropriate, given communications with stakeholders prior to the Board meeting. As you and the County are well aware, however, the agenda package always includes at least the proposed order and findings, the Fact Sheet, the comments received, and the staff's responses to comments. Nevertheless, please be advised that the following documents will also be included in the Agenda Package and therefore you need not request that staff bring them to the hearing:

1. Executive Summary
2. Summary of proposed deletions
3. The findings and provisions, the response to comments, and the PowerPoint presentation from the September 2006 reopening of the County of Los Angeles MS4 permit to include the summer dry weather wasteload allocations from the Santa Monica Bay Beaches Dry Weather Bacteria TMDL.

Of course, this list does not suggest that additional documents may not also be forwarded to the Board Members (including, for instance, this and other subsequent correspondence).

Since staff does not know which documents you believe are relevant to your presentation, staff cannot designate them for you. It is therefore appropriate that the County or any other party intending to rely upon particular documents identify them so staff can locate them and make them available. We note you lodged a similar objection during the proceeding to incorporate the SMBBB TMDL into the MS4 Permit last September. In response to your objections, staff ensured each and every document was available during the hearing. Yet, you did not utilize a single such document. We do not intend to repeat that exercise. We believe you have had adequate time to determine the documents from the record upon which the County wishes to rely during the hearing, and to advise staff accordingly.

Procedural Objections. Your objections and this letter are already part of the administrative record of this proceeding. These objections are being addressed in this letter, and therefore need not be re-raised at the hearing. During the SMBBB TMDL reopener, the Regional Board entertained approximately one hour of process objections lodged by you on behalf of the County, many of which merely duplicated the objections raised in writing prior to the Board hearing. The time allocated for such objections was at the expense of many members of the public who were unable to stay past the contemplated and ordinary time for the meeting. As noted above, the County may make any motions it chooses to make, during its allocated time.

Time. Not only was notice provided on May 11, 2007, but draft permit language, draft findings, and a draft fact sheet were also published, setting forth the precise action proposed, and the proposed reasons for that action. In other words, irrespective of the words used during the PowerPoint presentation typically made at the hearing, or the identity of the staff member selected to make the presentation, the documents released on May 11<sup>th</sup> fully identify the issues before the Board, and scope of the staff's proposals.

As you know, this proceeding is essentially a replay of the reopener to incorporate the SMBBB TMDL into the MS4 Permit last September. Indeed, the County's comment letter in large

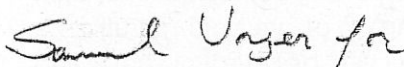
respects merely reiterates the comments it submitted during the previous proceeding in September. The response to comments will be available in short order, and as you might anticipate, staff's responses will not be significantly different than the responses from last September. The County is well aware of the matters at issue, and is represented by able counsel who is well-qualified to present the County's perspective on the significant issues under the Board's consideration. Should you desire a copy of the joint letter submitted by Santa Monica Baykeeper and Heal the Bay, please advise. Nevertheless, for your information, the following staff members may participate in presenting this item to the Board:

- Deborah Smith
- Samuel Unger
- Renee Purdy DeShazo
- Rebecca Christmann
- Xavier Swamikannu
- Carlos Urrunaga

Please also be advised that staff may call Dr. Mark Gold as a rebuttal witness to the County's presentation.

If you have any questions about the contents of this letter, please contact me at (213) 576-6609 or Michael Levy, Senior Staff Counsel at (916) 341-5193.

Sincerely,



Deborah J. Smith  
Interim Executive Officer

cc: Mr. Michael Levy Esq., Office of Chief Counsel, State Water Resources Control Board  
Mr. David E. Janssen, Chief Administrative Officer, County of Los Angeles