

ATTORNEYS AT LAW – A PROFESSIONAL CORPORATION

355 South Grand Avenue, 40th Floor, Los Angeles, California 90071-3101 Telephone 213.626.8484 Facsimile 213.626.0078

RICHARD RICHARDS February 1, 2016

Re:

VIA ELECTRONIC MAIL & U. S. MAIL

HARRY L. GERSHON (1922–2007)

GLENN R. WATSON (1917-2010)

STEVEN L. DORSEY WILLIAM L. STRAUSZ MITCHELL E. ABBOTT GREGORY W. STEPANICICH QUINN M. BARROW QUINN M. BARKOW CAROL W. LYNCH GREGORY M. KUNERT THOMAS M. JIMBO ROBERT C. CECCON STEVEN H. KAUFMANN KEVIN G. ENNIS ROBIN D. HARRIS MICHAEL ESTRADA MICHAEL ESTRADA LAURENCE S. WIENER B. TILDEN KIM SASKIA T. ASAMURA KAYSER O. SUME PETER M. THORSON JAMES L. MARKMAN CRAIG A. STEELE T. PETER PIERCE TERENCE R. BOGA TERENCE R. BOGA LISA BOND ROXANNE M. DIAZ JIM G. GRAYSON ROY A. CLARKE MICHAEL F. YOSHIBA REGINA N. DANNER PAULA GUTIERREZ BAEZA BRUCE W. GALLOWAY DIANA K. CHUANG PATRICK K. BOBKO NORMAN A. DUPONT DAVID M. SNOW LOLLY A. ENRIQUEZ LOLLY A. ENRIQUEZ GINETTA L. GIOVINCO TRISHA ORTIZ CANDICE K. LEE JENNIFER PETRUSIS STEVEN L. FLOWER TOUSSAINT S. BAILEY AMY GREVSON AMY GREYSON DEBORAH R. HAKMAN D. CRAIG FOX MARICELA E. MARROQUÍN SERITA R. YOUNG SEAN B. GIBBONS AARON C. O'DELL AMANDA L. CHARNE STEPHANIE CAO PATRICK D. SKAHAN STEPHEN D. LEE YOUSTINA N. AZIZ BRENDAN KEARNS KYLE H. BROCHARD NICHOLAS R. GHIRELLI ISRA SHAH CHRISTINA L. BROWNING ISAAC M. ROSEN ROMTIN PARVARESH

OF COUNSEL ROCHELLE BROWNE TERESA HO-URANO GENA M. STINNETT

SAN FRANCISCO OFFICE TELEPHONE 415.421.8484

ORANGE COUNTY OFFICE TELEPHONE 714.990.0901

TEMECULA OFFICE TELEPHONE 951.695.2373 Phil Wyels, Esq. Assistant Chief Counsel Office of Chief Counsel State Water Resources Control Board

1001 I Street Sacramento, CA. 95814 pwyels@waterboards.ca.gov

> Public Records Act Request for Communications between Office of Chief Counsel and Petitioners regarding pending SWRCB/OCC File A-2386

Dear Mr. Wyels:

This is a public records act request sent to you in your capacity as the contact person for PRA requests that do not fall within any other specific category as per the State Water Boards website. We hereby request, pursuant to California Public Records Act (Government Code Section 6250, *et seq.*), the following public records (including any records stored in electronic media):

- 1. Copies of any emails, letters, or other written communications between any member or representative of Office of Chief Counsel (including but not limited to Emil Wadhwani, Esq.) and any representative or counsel for the Natural Resources Defense Council, Inc., Heal the Bay, or Los Angeles Waterkeeper concerning SWRCB/OCC File A-2386;
- Copies of any notes taken in any format that describe or memorialize any telephonic communications between the Office of Chief Counsel and any representative or counsel of the Natural Resources Defense Council, Inc., Heal the Bay, or Los Angeles Waterkeeper concerning SWRCB/OCC File A-2386. This will include, but is not limited to, any notes of a telephonic conversation between Ms. Wadhwani and Ms. Hyatt on September 22, 2015;

Phil Wyels, Esq. February 1, 2016 Page 2

- 3. Copies of any emails, memoranda, or other written communications by any member of the Office of Chief Counsel to any other member (or members) of the Office of Chief Counsel that purport to quote, summarize, or otherwise describe communications referenced in categories no. 1 or 2 above.
- 4. Copies of any document related to or referencing in any fashion a determination or decision by the Office of Chief Counsel to the effect that nothing prevented the Natural Resources Defense Council, Inc., Heal the Bay and LA Waterkeeper from "supplementing" their petition of May 28, 2015 designated as File No. A-2386.

Pursuant to the Public Records Act, I will expect a communication by 10 days from the date of this request, or by no later than February 11, 2016. Please provide these requested records in an electronic format (CD or electronic mail) or, if that option is unavailable, we will pay for the reasonable and direct cost of duplicating the documents.

Please do not hesitate to contact me if you require any further clarification regarding this request.

Very truly yours,

Norman A. Dupont

cc: Miles P. Hogan, Esq. Richard Montevideo, Esq.

82001-0012\1921614v1.doc