

Los Angeles Regional Water Quality Control Board

May 15, 2018

Mr. Frank De Marco, Jr., Vice President
Santa Anita Land Holdings, LLC & Los Angeles
Turf Club, Inc.
Santa Anita Park
285 West Huntington Drive
Arcadia, CA 91007

Dear Mr. De Marco:

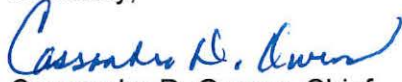
**EXTENSION OF COMMENT PERIOD AND CONTINUATION OF BOARD CONSIDERATION
FOR ADOPTION OF TENTATIVE WASTE DISCHARGE REQUIREMENTS (WDRs),
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT AND
TENTATIVE TIME SCHEDULE ORDER – SANTA ANITA LAND HOLDINGS, LLC & LOS
ANGELES TURF CLUB, INC (NPDES NO. CA0064203, CI-8102)**

Our letter dated April 24, 2018, informed you that the tentative Waste Discharge Requirements (WDRs)/National Pollutant Discharge Elimination System (NPDES) permit, and tentative Time Schedule Order (TSO) for the subject facility was available for public comment and scheduled for public hearing during the June 14, 2018, Board Hearing. In an email sent on May 9, 2018 (attached), William W. Funderburk, Jr., of Castello & Funderburk LLP, informed the Los Angeles Regional Water Board staff that his firm and a new engineer had been recently retained by Santa Anita Land Holding, LLC. Consequently, Mr. Funderburk, on behalf of Santa Anita Land Holding, LLC, requested a sixty day extension of the comment period which was scheduled to conclude on May 24, 2018. Management agreed to extend the comment deadline as requested to July 23, 2018.

The item is now tentatively scheduled to be considered at the September 13, 2018, Board Hearing which will be held at 9:00 a.m., at the Ventura County Government Center Hearing Room, 800 South Victoria Avenue, Ventura, California. The Board will consider the tentative requirements and comments regarding any and all portions thereof. Written comments must be received at the Regional Water Board office by 5:00 p.m. on July 23, 2018.

If you have any questions, please contact Mazhar Ali at (213) 576-6652.

Sincerely,



Cassandra D. Owens, Chief
Industrial Permitting Unit

Enclosure: Email from William Funderbuck dated May 9, 2018

cc: See Mailing List

MAILING LIST (VIA EMAIL ONLY)

David Smith, Environmental Protection Agency, Region 9
Robyn Stuber, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Becky Mitschele, Environmental Protection Agency, Region 9
Sophie Froelich, California State Water Resources Control Board
Kenneth Wong, U.S Army Corps of Engineers
Bryant Chesney, NOAA, National Marine Fisheries Service
Jeff Phillips, Department of Interior, U.S. Fish and Wildlife Service
William Paznokas, Department of Fish and Game, Region 5
Tim Smith, Los Angeles County, Department of Public Works, Waste Management Division
Sarah Sikich, Heal the Bay
Annelisa Moe, Heal the Bay
Melissa Kelly, Los Angeles Waterkeeper
Corinne Bell, Natural Resources Defense Council
Joan Mathews, Natural Resources Defense Council
James Ashby, PG Environmental
Sarah Torres, PG Environmental
Tim Shaheen, Santa Anita Land Holding, LLC
Ian Adam, Fuscoe Engineering, Inc.
Stephanie Castle-Zinn, Fuscoe Engineering, Inc.
Arthur Pugsley, Los Angeles WaterKeeper
William W. Funderburk, Castello & Funderburk LLP

From: William W. Funderburk, Jr.
To: [Morris, Cris@Waterboards](mailto:Morris_Cris@Waterboards)
Cc: [Anna L. Le May](#)
Subject: Santa Anita Holdings, LLC & Los Angeles Turf Club Inc. (NDPES No. CA0064203, CI-8102)
Date: Wednesday, May 09, 2018 4:06:09 PM

Dear Ms. Morris:

It was nice speaking with you this afternoon.

This firm was recently retained to represent Los Angeles Turf Club, Inc. ("Turf Club") in connection with the above-referenced permit renewal before the Los Angeles Regional Water Quality Control Board ("Regional Water Board"). The public has an interest in a complete record of the proceedings with the Turf Club's proposed permit, including a full response from the Turf Club to the proposed permit. Counsel and a new engineer were recently retained and must review a record that stretches back well over ten years. Working out issues that are in dispute will save administrative resources and potentially avoid appeals.

Accordingly, the Turf Club respectfully requests an extension of sixty (60) days for the hearing presently scheduled for June 14, 2018 and for which comments are due May 24, 2018. The Turf Club will cooperate with the Regional Water Board on assisting with renoticing and posting notice to the public if an extension is granted.

Thank you.

Regards,

Bill Funderburk

William W. Funderburk, Jr.

wfunderburk@candffirm.com



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