

LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

DISCLOSURE FORM
EX PARTE COMMUNICATIONS REGARDING PENDING GENERAL ORDERS

Note: This form is intended to assist the public in providing the disclosure required by law. It is designed to document meetings and phone calls. Written communications may be disclosed by providing a complete copy of the written document, with attachments. Unless the board member(s) provided you with a different contact person, please send your materials to: hugh.marley@waterboards.ca.gov or jenny.newman@waterboards.ca.gov

Use of this form is not mandatory.

1. Pending General Order that the communication concerned: **STORMWATER
CII PERMIT**
2. Name, title and contact information of person completing this form:
Note: Contact information is not mandatory, but will allow the Water Board to assist you if additional information is required. If your contact information includes your personal residence address, personal telephone number or personal email address, please use a separate sheet of paper if you do not want that information posted on our website. However, this information may be provided to members of the public under the Public Records Act. **KRISTOPHER ANDERSON, Policy ADVOCATE
CALCHAMBER, kristopher.anderson@calchamber.com**
3. Date of meeting, phone call or other communication: **11/10/25**
Time: **8:35 A.M.**
Location: **VIA EMAIL**
4. Type of communication (written, oral or both): **WRITTEN**
5. Names of all participants in the communication, including all board members who participated: **BOARD MEMBERS NOLAN, ASHTIAN, CAMACHO,
CRISTIANSEN & MENDEZ**
6. Name of person(s) who initiated the communication: **Kristopher Anderson**
7. Describe the communication and the content of the communication. Include a brief list or summary of topics discussed at the meeting, any legal or policy positions advocated at the meeting, any factual matters discussed, and any other disclosure you believe relevant. The Office of Chief Counsel recommends that any persons requesting an ex parte meeting prepare an agenda to make it easier to document the discussion properly. Attach additional pages, if necessary.
THE LETTER REQUESTED THAT THE REGIONAL BOARD REJECT ADOPTION OF THE PROPOSED CII PERMIT AND DIRECT STAFF TO WORK WITH STAKEHOLDERS TO ADDRESS OUTSTANDING CONCERNS.
8. Attach a copy of handouts, PowerPoint presentations and other materials any person used or distributed at the meeting. If you have electronic copies, please email them to facilitate web posting.



Submission via Email to: david.nahai@waterboards.ca.gov

November 10, 2025

Chair David Nahai
Los Angeles Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013-2343

RE: CII Coalition Comments – Request to Reject Adoption of Draft Permit

Dear Chair Nahai:

On behalf of the signatories to this letter, we urge the members of the Los Angeles Regional Water Quality Control Board (Board) to reject the adoption of the draft proposed Commercial, Industrial & Institutional Permit (CII Permit) and instead direct staff to work directly with stakeholders to resolve outstanding concerns and lack of clarity with the CII Permit provisions and compliance options.

Despite submission of robust written comments over the past few years and efforts to work with the Board, significant concerns remain with the CII Permit including overly burdensome, duplicative, costly and unclear requirements and compliance details. Hundreds of prospective permittees across commercial, industrial and institutional sectors in the designated watersheds will be affected, many of whom have never had to comply with such a permit before. Although staff has made a few changes to address some of the concerns, the changes do not go far enough to address the concerns, ambiguities, and significant costs that will be borne by prospective permittees.

Further, while we appreciate the inclusion and creativity associated with Compliance Option 1, the option lacks meaningful and important details to enable prospective permittees to assess and determine whether it is a workable option and at what cost. Absent additional details and clarity, we are highly concerned it will not be a compliance option that can be utilized. Additionally, while it is helpful that the timeline for choosing and implementing a compliance option has been extended, the process for the watershed management groups to establish a legal entity to collect fees and administer the compliance option and associated details could take the entire timeframe, hindering it as a real option for compliance purposes – not to mention little clarity for prospective permittees to make an informed decision whether to utilize the option and at what cost.

Finally, this is the first permit of its kind in California. In this regard, it is critically important that the Board get this CII Permit right rather than advance a permit that continues to have significant issues. Failure to address these significant concerns could very well lead to an appeal or challenge on the CII Permit before it gets off the ground for implementation.

In this regard, we urge the Board to direct staff to work on addressing the outstanding issues and concerns with stakeholders prior to adoption of the CII Permit.

Sincerely,

Tricia Geringer
Vice President of Government Affairs
Agricultural Council of California

Greg Pirnik
President
State of California Auto Dismantlers (SCADA)

Michael Miiller
Director of Government Affairs
California Association of Winegrape Growers

Donna Duperron
President/CEO
Torrance Area Chamber of Commerce

Kristopher Anderson
Policy Advocate
California Chamber of Commerce

Adam Harper
Senior Director of Policy
California Constructions and Industrial Materials
Association

Elizabeth Esquivel
Vice President of Government Relations
California Manufacturers & Technology
Association

Sarah Pollo Moo
Director Communications & Public Affairs
California Retailer Association

Naomi Padron
Partner
California Self Storage Association

Lisa Johnson
Executive Director
Chemical Industry Council of California

Jack Monger
CEO
Industrial Environmental Association

Jeremy Harris
President/CEO
Long Beach Area Chamber of Commerce

Mihran Toumajan
Manger of Government Relations
NAIOP SoCal

Marilyn Lyon
VP Communications & Government Affairs
Palos Verdes Peninsula Chamber of Commerce

Naomi Padron
Partner
Self Storage Association