



Los Angeles Regional Water Quality Control Board

January 18, 2017

VIA EMAIL ONLY

Emel Wadhvani
Office of Chief Counsel
State Water Resources Control Board
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PETITIONS OF LOS ANGELES WATERKEEPER AND NATURAL RESOURCES DEFENSE COUNCIL, INC. FOR REVIEW OF THE APPROVAL OF THE NORTH SANTA MONICA BAY ENHANCED WATERSHED MANAGEMENT PROGRAM, IN ACCORDANCE WITH THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT, ORDER R4-2012-0175 AS AMENDED BY STATE WATER BOARD ORDER WQ 2015-0075; BY THE LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD: LOS ANGELES WATER BOARD REQUEST FOR EXTENSION OF TIME TO FILE RESPONSE TO PETITION
SWRCB/OCC FILES A-2477 AND A-2508

Dear Ms. Wadhvani:

The Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) has received your letter dated January 5, 2017, whereby the State Water Resources Control Board (State Water Board) requested that the Los Angeles Water Board submit the administrative record in this matter and provided an opportunity for the Los Angeles Water Board and other interested persons to submit written responses to Los Angeles Waterkeeper and the Natural Resources Defense Council's (collectively, Petitioners) above-referenced petitions. For the following reasons, the Los Angeles Water Board respectfully requests a 20-day extension of time, until February 24, 2017, (i.e., 50 days total) to submit the Los Angeles Water Board's response to the petition:

- The administrative record for this matter is large, consisting of several thousand pages. The Los Angeles Water Board is again preparing the entire record in electronic format to make review of the record more accessible. In so doing, significant staff time is required to assure the record is prepared in an organized way that will be helpful to the State Water Board in its review and to assure that it is complete, as well as time required to be spent on technical factors - such as converting documents to PDF format, the need to reduce the size of the PDF files to meet the processing capacity of the conversion software, the process of merging the individual PDF files into one file by record section and Bates numbering each section of the record sequentially, and the process of creating the corresponding index with the Bates numbering for each document to facilitate navigating the record. At this time, the Los Angeles Water Board is not requesting an extension of time to submit the administrative record and intends to submit the record by February 6, 2017. However, since considerable

time will be required to prepare the record, several key Los Angeles Water Board staff will be unavailable to assist in drafting the Board's response to the petition, and neither these staff nor the attorney assigned to this matter will have access to the complete record in order to make references to documents in the record, as well as to include Bates numbering for ease of reference. Thus, the Los Angeles Water Board needs the first 30 days to prepare the record, and additional time to prepare its response.

- The Los Angeles Water Board staff and the attorney assigned to this matter have had limited availability to work on the petition response since receiving the State Water Board's 30-day letter on January 5, 2017. The attorney assigned to this matter was on vacation when the 30-day letter was received and only returned to the office on January 17, 2017. In addition, the Los Angeles Water Board has its annual Priority and Budget Discussion meeting on January 25, 2017 and its next regular Board meeting on February 2, 2017. Several staff and the attorney involved in this matter are involved in matters at those meetings and, therefore, cannot devote the time necessary to work on the petition response until after the Board meetings. The staff and attorney involved in this matter, as well as the other two attorneys for the Los Angeles Water Board, must also continue to handle all the other day-to-day matters before the Board.

Given these reasons, 30 days is not sufficient time for the Los Angeles Water Board to both prepare a proper response to the petition and to complete preparation of the administrative record. The Los Angeles Water Board respectfully requests that the State Water Board grant the Los Angeles Water Board's request to submit its response to the petitions by February 24, 2017. In the event the Los Angeles Water Board can prepare its response prior to that date, the Board will submit its response sooner. The Los Angeles Water Board does not oppose the granting of the same amount of additional time for others to respond to the petition as well.

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

Sincerely,



Samuel Unger, PE
Executive Officer

cc: A-2508 Distribution List

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[via email only]**

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