



February 9, 2017

ATTN: Jun Zhu

Ms. Renee Purdy
Section Chief, Regional Programs
California Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Re: Comment Letter – Revisions to the Los Angeles Region 303(d)

Dear Ms. Purdy:

The Gateway Water Management Authority Board of Directors, at its regular Board Meeting on February 9, 2017, unanimously voted to submit a formal letter requesting an extension of time to provide written comments on the proposed revisions to the 303(d) list. The significance of the changes is critical and has far-reaching implications.

Thus, we respectfully request that the 30-day deadline to submit comments be extended to 60 days. We understand that the hearing is scheduled for April 6th, and hope that this request will extend the hearing date as well. This is an extremely important issue that requires our full attention and it is our hope that our request will be granted.

Sincerely,

Christopher S. Cash
Chair

cc: GWMA Board Members
Lower Los Angeles River Upper Reach 2 Watershed Group
Lower Los Angeles River Watershed Group
Lower San Gabriel River Watershed Group
Los Cerritos Channel Watershed Group

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GRACE ROBINSON HYDE
Chief Engineer and General Manager

February 10, 2017
File No. 37370.40.4A

Via Electronic Mail

Dr. Jun Zhu

California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Request for Extension of Comment Deadline for the Los Angeles Region 303(d) List

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to provide comments to the California Regional Water Quality Control Board Los Angeles Region (Regional Board) on the proposed revisions to the Los Angeles Region 303(d) list. The Sanitation Districts provide wastewater and solid waste management services to approximately 5.6 million people in 78 cities and unincorporated areas of Los Angeles County, and are authorized to manage stormwater and urban runoff in support of local jurisdictions' compliance with Municipal Separate Storm Sewer System (MS4) NPDES permits. The Sanitation Districts are comprised of 24 individual special districts that own and operate eleven wastewater treatment facilities, many of which discharge to water bodies within the Los Angeles region that are included in the proposed 303(d) list. As such, revisions to the Los Angeles Region 303(d) list have the potential to impact our agency.

The Notice of Hearing and Opportunity to Comment on the proposed revisions was released on February 8, 2017, with comments due to the Regional Board on March 9, 2017 and a public hearing on April 6, 2017. The magnitude of the proposed changes is significant. Based on a very preliminary review of the proposed revisions, we have identified approximately 200 proposed new listings and have noticed discrepancies in the listings that will need to be resolved. Based on the identified issues, we believe that the March 9 deadline for receipt of comments will not provide adequate time for our agency to thoroughly review the revisions, engage with Regional Board staff as appropriate, and formulate well-supported comments. Therefore, we request an extension of the comment period from 30 to at least 90 days and a delay in the public hearing, to allow for adequate time to review and submit our comments regarding the proposed revisions.

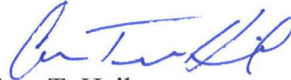
The Sanitation Districts support the Regional Board's intent to revise the Los Angeles Region 303(d) list through updated assessments of the region's surface waters and would like to ensure that the proposed revisions are reviewed and analyzed thoroughly prior to adoption. In the interest of protecting and restoring water quality of surface waters in our region, the Sanitation Districts believe that an extension of the comment period is entirely appropriate and necessary.

Dr. Jun Zhu

February 10, 2017

If you have any additional questions or would like additional information on the issues identified above, please do not hesitate to contact the undersigned at (562) 908-4288, extension 2801 or aheil@lacsds.org.

Very truly yours,



Ann T. Heil
Section Head
Reuse and Compliance

ATH:NM:nm



February 13, 2017

Dr. Jun Zhu
California Regional Water Quality Control Board Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Via Electronic Mail

Re: Request for Extension of Comment Deadline for the Los Angeles Region 303(d) List

The Los Angeles County Division of the League of California Cities® (Division), representing 86 cities in the county appreciates the opportunity for our member cities to comment to the California Regional Water Quality Board of Los Angeles Region (Regional Board) on the proposed revisions to the Los Angeles Region 303(d) list.

Every city in our Division makes significant investments to comply with their Municipal Separate Storm Sewer System (MS4) permit therefore the proposed revisions to the 303(d) list may have significant impacts to cities. Given the amount of staff resources and technical expertise required to fully review and comment on the proposed revisions, we respectfully request that the 30-day deadline to submit comments to the Regional Board is extended to at least 90 days. We also request a delay in the public hearing date currently scheduled for April 6, 2017.

Thank you for consideration of this request. If you have any additional questions or would like additional information, please contact Kristine Guerrero at (626) 716-0076.

Sincerely,

Jess A. Talamantes
President
Los Angeles County Division
League of California Cities®

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(626) 914-8200

116 East Foothill Blvd., Glendora, California 91741

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February 14, 2017

Mr. Sam Unger
California Regional Water Quality Control Board
Los Angeles Region
320 W. 411 Street, Suite 200
Los Angeles, CA 90013

Re: Request for 90-Day Extension of Comment Deadline on the Proposed Revisions to the Clean Water Act Section 303(d) List for the Los Angeles Region

Dear Mr. Unger:

On behalf of the City of Glendora, I am writing to request a 90-day extension to the public comment period for the proposed revision to the Clean Water Act Section 303(d) listing for the Los Angeles Region.

Glendora seeks to address important issues impacting our community, including access to safe and clean drinking water, and proper treatment of stormwater and urban runoff. We take seriously the protection of the environment and our responsibilities therein. We join other cities located within the San Gabriel Valley that are taking special interest in regulatory decisions that affect interpretation of the Clean Water Act. A majority of our cities are Municipal Separate Sewer Stormwater System (MS4) permittees which discharge to water bodies within the Los Angeles region that are included in the proposed changes to the 303(d) list. As such, revisions have the potential to significantly impact our city.

The Notice of Hearing and Opportunity to Comment on the proposed revisions was released on February 8, 2017, with comments due to the Regional Board on March 9, 2017 and a public hearing on April 6, 2017. The magnitude of the proposed changes is significant. Your staff has identified 200 proposed new listings¹. We believe that the March 9 deadline for receipt of comments will not provide adequate time for us to thoroughly evaluate the revisions, engage with Regional Board staff, and formulate well-supported comments. Therefore, we request an extension of the comment period from 30 to at least 90 days and a delay in the public hearing.

Glendora supports the Regional Board's intent to revise the Los Angeles Region 303(d) list and would like to ensure that the proposed revisions are reviewed and analyzed thoroughly prior to adoption.

Sincerely,

CITY OF GLENDORA


Chris Jeffers
City Manager

¹ 2016 Clean Water Act Sections 305(b) and 303(d) Integrated Report for the Los Angeles Region: Staff Report, Los Angeles Regional Water Quality Control Board, February 2017

CITY OF LOS ANGELES

CALIFORNIA

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February 14, 2017

Rence Purdy, Section Chief, Regional Programs
California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Attention: Dr. Jun Zhu, Environmental Scientist

REQUEST FOR ADDITIONAL TIME TO SUBMIT COMMENTS ON PROPOSED REVISIONS TO CLEAN WATER ACT SECTION 303(d) LIST FOR THE LOS ANGELES REGION

In the "NOTICE OF HEARING AND OPPORTUNITY TO COMMENT" issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), dated February 8, 2017, the LARWQCB required that all written comments on the proposed revisions to the Clean Water Act Section 303(d) list and the 2016 Integrated Report be received by the LARWQCB no later than 5:00 p.m. on March 9, 2017. The City of Los Angeles (City) has initiated its review process, but will need more time to complete its review of the supporting documentation and to prepare comments. As stated in the LARWQCB's accompanying "Staff Report," dated February 2017, there are "... a significant number of changes to the Los Angeles Region's 303(d) list . . . , 200 proposed new listings, and 40 proposed delistings.

In consideration of the large volume of proposed changes, the City respectfully requests a 90-day extension for the submittal of written comments.

If you require additional information, please contact Hassan Rad, Division Manager of the Regulatory Affairs Division at (213) 847-5186.

Sincerely,

ENRIQUE C. ZALDIVAR, Director
LA Sanitation

zero waste • one water

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

4-6
Recyclable and made from recycled waste





February 14, 2017

Via Electronic Mail

Dr. Jun Zhu
California Regional Water Quality Control Board,
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Subject: **Request for Extension of Comment Deadline for the Los Angeles Region
303(d) List**

Dear Dr. Zhu:

I am writing on behalf of the Elected Officials Steering Committee, which was assembled by the California Contract Cities Association and the League of California Cities, Los Angeles County Division in 2015 to work collaboratively on storm water issues and which is currently comprised of representatives from the Cities of Claremont, Culver City, Glendora, Hermosa Beach, Long Beach, Rolling Hills Estates, Rosemead, Santa Clarita, Signal Hill, South Gate, South Pasadena, and Torrance. The Steering Committee appreciates the opportunity to provide comments to your Board on the proposed revisions to the Los Angeles Region 303(d) list. Our members, along with our constituents, are very interested in issues related to water quality and water quality regulations in the Region. As such, we request that the Los Angeles Regional Water Board extend the March 9, 2017 comment deadline on the proposed 2016 303(d) List revisions.

The Los Angeles Regional Water Board released a Notice of Hearing and Opportunity to Comment on the proposed 303(d) list revisions on February 8, 2017. The Draft 2016 Section 303(d) and 305 (b) Integrated Report for Public Review includes a Staff Report and eight (8) lengthy appendices. The Steering Committee understands that there is a significant number of proposed changes, including approximately 200 proposed new listings, some of which have been identified by other agencies as requiring corrections. The Steering Committee believes that a 30-day review period will be insufficient to allow Permittees to review the new list in a meaningful way and to prepare comments for your Board. We request that the Regional Water Board extend the comment period to a more appropriate 90-day duration and that the public hearing be rescheduled for a date following that 90-day review period.

The Elected Officials Steering Committee appreciates the work undertaken by the Regional Water Board in the updating of the 303(d) list. In order for the list to receive appropriate review, an extension of the review period is necessary.

Dr. Jun Zhu

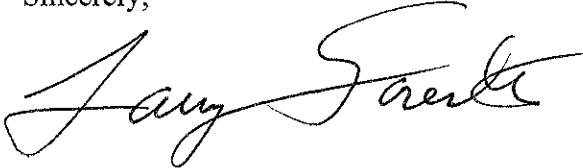
Request for Extension of Comment Deadline for the Los Angeles Region 303(d) List

February 14, 2017

Page 2 of 2

Thank you for the opportunity to provide these comments and for your consideration of our request to extend the review period.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Forester". The signature is fluid and cursive, with the first name "Larry" and last name "Forester" clearly distinguishable.

LARRY FORESTER

CO-CHAIR, ELECTED OFFICIALS STEERING COMMITTEE

Council Member, City of Signal Hill

Cc: Elected Officials Steering Committee Members
Renee Purdy
Sam Unger

LF/jm

February 17, 2017

Renee Purdy, Regional Programs Section Chief
California Regional Water Quality Control Board, Los Angeles Region
320 W. 4th Street
Los Angeles, CA 90013

SUBJECT: Request for 90-day Comment Period for Review of Proposed Revisions to the Clean Water Act Section 303(d) List for the Los Angeles Region and 2016 Integrated Report

Dear Ms. Purdy,

On February 8, 2017, the Regional Board distributed a notice of opportunity to comment on the proposed revisions to the Clean Water Act Section 303(d) List for the Los Angeles Region and the 2016 Integrated Report. It is understood that the comment deadline is March 9, 2017 (i.e. 30-day comment period) and a public hearing will be held on April 6, 2017.

The Palos Verdes Peninsula (PVP) Watershed Management Group (WMG) requests a 90-day comment period (i.e. until May 9, 2017) in order to fully review the lengthy amount of information that the Board has provided for the proposed revisions. Several new listings are suggested that would impact the PVP WMG, and the participating members feel that 30 days is not an adequate amount of time to thoroughly review the data.

We appreciate your time and consideration of our request.

Sincerely,



Natalie Chan, PE, QSD

City of Rancho Palos Verdes

On behalf of the Palos Verdes Peninsula Watershed Management Group

Cc: Greg Grammar – City of Rolling Hills Estates
Ken Rukavina – City of Palos Verdes Estates
Bill Johnson – Los Angeles County Flood Control District



City of Manhattan Beach

Public Works Department

3621 Bell Avenue, Manhattan Beach, CA 90266
Phone: (310) 802-5313 Fax: (310) 802-5301

February 21, 2017

Samuel Unger, P.E., Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
Via email: losangeles@waterboards.ca.gov

Attn: Kangshi Wang, Water Resources Control Engineer (Kangshi.Wang@waterboards.ca.gov)
Jun Zhu, Environmental Scientist (jzhu@waterboards.ca.gov)

Subject: Request for extension of time for written public comments on proposed revisions to the Los Angeles Region 303(d) list

Dear Mr. Unger:

On February 8, 2017, the Los Angeles Regional Water Quality Control Board (Regional Board) issued a 30-day Notice of Public Hearing and Opportunity to Comment on the Proposed Revisions to the Clean Water Act Section 303(d) List for the Los Angeles Region and the 2016 Integrated Report. According to this notice, the comment deadline is March 9, 2017 and the public hearing is scheduled for April 6, 2017.

The City of Manhattan Beach respectfully requests on behalf of the Beach Cities Watershed Management Group, including the cities of Hermosa Beach, Redondo Beach and Torrance, that the deadline for submittal of written comments on the Los Angeles Region's draft 2016 Section 303(d) and 305(b) Integrated report be extended by an additional sixty (60) days to May 9, 2017 and that the public hearing be postponed until after this date. There are numerous changes proposed in the Integrated Report for both the Santa Monica Bay and Dominguez Channel water bodies that affect the members of the Beach Cities Watershed Management Group. Additional time is essential for our city staffs to review the extensive data and numerous documents associated with the Integrated report so that we may provide salient comment and recommendations.

Your prompt response to this request would be greatly appreciated.

Sincerely,

Stephanie Katsouleas, P.E.
Director of Public Works

Copies:

Andrew Brozyna, City of Hermosa Beach
Ted Semaan, City of Redondo Beach
Robert Beste, City of Torrance



February 23, 2017

VIA EMAIL to:

losangeles@waterboards.ca.gov, Jun.Zhu@waterboards.ca.gov, LB.Nye@waterboards.ca.gov,
sunger@waterboards.ca.gov and rpurdy@waterboards.ca.gov

Dr. Jun Zhu and Dr. L. B. Nye
Los Angeles Regional Water Quality Control Board
320 W. Fourth St., Suite 200
Los Angeles, CA 90013

Re: Comment Letter – Revisions to the Los Angeles Region 303(d) list

Dear Dr. Zhu and Dr. Nye:

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) represents over 80 public agencies that provide essential water supply and wastewater treatment to nearly 19 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. SCAP's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastes into resources such as recycled water and biogas. Many SCAP member agencies discharge to water bodies within the Los Angeles region that are included in the proposed 303(d) list. Revisions to the Los Angeles Region 303(d) list have the potential to impact our member agencies.

SCAP appreciates the opportunity to provide comments to the California Regional Water Quality Control Board Los Angeles Region (Regional Board) on the proposed revisions to the Los Angeles Region 303(d) list. The Notice of Hearing and Opportunity to Comment on the proposed revisions was released on February 8, 2017, with comments due to the Regional Board on March 9, 2017 and a public hearing on April 6, 2017. The magnitude of the proposed changes is significant. Based on a preliminary review of the proposed revisions, we have identified approximately 200 proposed new listings. There also appear to be some discrepancies in the listings that will need to be investigated and resolved. Based on the issues described above, we believe that the March 9 deadline for receipt of comments will not provide adequate time for our member agencies to thoroughly review the revisions, engage with Regional Board staff as appropriate, and prepare well-supported comments. Therefore, we formally request an extension of the comment period

P.O. Box 231565

Encinitas, CA 92024-1565

Fax: 760-479-4881 Tel: 760-479-4880 Website: www.scap1.org Email: info@scap1.org

from 30 days to at least 90 days and a delay in the public hearing, to allow for adequate time to review and submit comments regarding the proposed revisions. SCAP is in full support of the Regional Board's intent to revise the Los Angeles Region 303(d) list through updated assessments of the region's surface waters and would like to ensure that the proposed revisions are reviewed and analyzed thoroughly prior to adoption. In the interest of creating meaningful and implementable policies for protecting and restoring water quality of surface waters in the Los Angeles region, SCAP believes that an extension of the comment period is essential.

SCAP greatly appreciates the Regional Board's attention to this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Jepsen", is written in a cursive style.

Steve Jepsen, Executive Director