

Los Angeles Regional Water Quality Control Board

**VIA EMAIL ONLY**

**TO:** Emel G. Wadhvani  
Senior Staff Counsel



**FROM:** Deborah Smith  
**CHIEF DEPUTY EXECUTIVE OFFICER**

**DATE:** September 16, 2013

**SUBJECT:** IN RE PETITIONS CHALLENGING 2012 LOS ANGELES MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT (ORDER NO. R4-2012-0175): LOS ANGELES WATER BOARD REQUEST FOR ONE WEEK EXTENSION TO TO FILE ADMINISTRATIVE RECORD AND RESPONSE TO PETITIONS **SWRCB/OCC FILES A-2236(a) THROUGH (kk)**

The Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) received your letter dated July 8, 2013, providing an opportunity to submit to the State Water Resources Control Board (State Water Board) responses to the petitions and requesting that the Los Angeles Water Board submit the administrative record in the matter of the Los Angeles County MS4 permit, Order No. R4-2012-0175 (LA MS4 permit). On July 10, 2013, the Los Angeles Water Board requested and was granted an extension of time, until noon on September 20, 2013, to submit the administrative record and the Los Angeles Water Board's response to the petitions. For the reasons stated in that letter and for these additional reasons, the Los Angeles Water Board requests an additional one week extension, until noon on September 27, 2013, to submit the administrative record and its response to the petitions:

- As noted in the Los Angeles Water Board's July 10, 2013 request, the record for this matter is very large, and was previously estimated to be about 15,000 pages. The record, however, is larger than first contemplated – now consisting of approximately 1,500 documents and over 100,000 pages.
- The Los Angeles Water Board is preparing the entire record in electronic format for the first time. While this will make review of the record more accessible, in the process the Los Angeles Water Board has faced several new problems, including for example:
  - the need for special software to convert documents to PDF format;
  - the need to reduce the size of the PDF files, because many include extensive graphics that cause the file size to balloon;
  - the process of merging the individual PDF files into one file by record section and Bates numbering each section of the record sequentially;

- the process of creating the corresponding index with the Bates numbering for each document to facilitate navigating the record; and
- due to the file size of some of the documents, which has exceeded the processing capacity of the software, files have become corrupted in the middle of this process, requiring staff to take several steps back to further reduce the file size and start the process over again.

As previously explained in the Los Angeles Water Board's July 10, 2013 request, the Los Angeles Water Board is required to respond to multiple petitions and contentions, and many of the issues raised are both legally and factually complex. Further, due to the difficulties in preparing the record, the Los Angeles Water Board staff and attorneys drafting the Board's response to the petitions have not had access to the complete record in order to make appropriate references to documents in the petition, as well as to include Bates numbering for ease of reference.

Given these additional issues, the Los Angeles Water Board requests that the State Water Board grant the Los Angeles Water Board's request submit the administrative record and its response to the petitions by noon on September 27, 2013. The Los Angeles Water Board does not oppose the granting of the same amount of additional time for others to respond to the petitions as well.

If you have any questions, please contact Renee Purdy at [rpurdy@waterboards.ca.gov](mailto:rpurdy@waterboards.ca.gov) or at (213) 576-6622 or Frances McChesney at [fmcchesney@waterboards.ca.gov](mailto:fmcchesney@waterboards.ca.gov) or at (916) 341-5174.

cc: See next page

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Exhibit A- Petitioners and Their  
Counsel of Record

**[via email only]**  
Exhibit B – MS4 Dischargers List

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