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Re: *Petition No. A-2386: Natural Resources Defense Council, Inc., et. al. Petition to Review Approval of Watershed Management Plans--Municipal Permittee Request for Extension of Time to File Response*

Dear Mr. Mallory-Jones:

This firm represents the cities of Artesia, Norwalk, and La Mirada (Municipal Permittees), who are part of the Lower San Gabriel River Watershed Management Group. That group submitted and received approval for its Watershed Management Plan that is now part of the challenge raised in the Petition filed by the Natural Resources Defense Council, Heal the Bay and Los Angeles Waterkeeper ("Petitioners"). For the reasons set forth below, the Municipal Permittees request a 36-day extension to prepare their response to the Petition.

- Municipal Permittees understand that the administrative record will be completed by the Los Angeles Regional Water Board (LA Board) by December 10, 2015. Permittees need a significant

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amount of time to review the record and prepare appropriate page citations to portions of the record related to the WMP that they have participated in and currently implementing. Given the very large record on this matter (per the LA Board's November 20, 2015 letter to you) and the intervening Christmas and New Year's holidays, it is necessary to have an extension in order to provide adequate documentation that will assist the State Board in its review of the Petition.

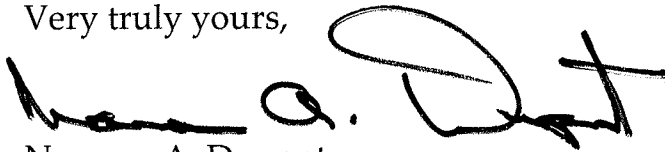
- Prior to receipt of the State Board's direction that responses be submitted by December 10, 2015, the Municipal Permittees' lead counsel in this matter had received an order from the Court of Appeals (Fourth District) requiring completion of a major appellate brief by December 14, 2015. Lead counsel, Mr. Dupont, appeared before the LA Board in its separate hearing on September 10, 2015, and is intimately familiar with the background of this matter from the Municipal Permittees perspective. But, because of the prior order from the Court of Appeal, lead counsel will be otherwise occupied before and for some time after December 10, 2015.
- Municipal Permittees need time to consider the potential effect of an "addendum" filed by the Petitioners on October 30, 2015. Permittees understand that this Board imposes a strict 30-day limit on any appeal from an adverse decision, which in this case was issued by the LA Board on September 10, 2015. This suggests that the addendum petition should have been filed no later than October 10, 2015, in order to be considered timely. The Municipal Permittees need additional time to consider this

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procedural issue, which is apparently a novel issue in terms of the timing of its presentation to the State Board.

The LA Board has stated that it does not oppose “the granting of the same amount of time” that it has requested (i.e., to January 15, 2016) to other respondents, which would include the Municipal Permittees. For these reasons, the Municipal Permittees respectfully request that the State Board grant them to and including January 15, 2016 to file their response to the Petition.

Very truly yours,



Norman A. Dupont

cc: All Interested Parties (list attached)

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LIST OF PETITIONERS SERVED VIA E-MAIL ONLY

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**A-2386**

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