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File No. 61022.00004

August 13, 2013

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Re: SWRCB/OCC File A-2236(a) Through (kk)

Dear Ms. Wadhvani:

On behalf of the San Diego County Regional Airport Authority (“Airport Authority”), Best Best & Krieger is pleased to submit these comments on the State Water Resources Control Board’s (“State Board”) current receiving water limitations (“RWL”) language and its two questions regarding the Los Angeles County MS4 Permit’s (“LA Permit”) approach to the issue. As a special purpose entity that faces significant limitations on its ability to spend airport revenue, the Airport Authority brings a unique perspective to these questions. The Airport Authority encourages the State Board to revise its current RWL language, but to do so in a manner that creates a meaningful compliance path for special purpose entities such as the Airport Authority. Revisions to the current RWL language are particularly important in light of the 9th Circuit Court of Appeals’ decision issued August 8, 2013¹, which is more fully discussed below.

I. Why the Current RWL Language is a Concern to the Airport Authority

The Airport Authority is a local governmental entity initially created by the State of California in 2001 pursuant to Public Utilities Code §§ 170000 *et seq.* to operate the San Diego International Airport. The Airport covers approximately 661 acres and serves as both a domestic and international commercial airport. The Airport Authority operates the Airport on land that it leases from the San Diego County Unified Port District, who retains trusteeship of the lands underlying the Airport.

Airport operations, including the runway area, taxiways and terminals, require paved or other impervious surfaces. Therefore, approximately 85 to 90 percent of the Airport contains impervious surfaces. The majority of the surface water runoff from the Airport is conveyed via sheet flow into gutters and storm drain inlets, and ultimately discharges to San Diego Bay.

¹ *Natural Resources Defense Council v. County of Los Angeles* (9th Cir. August 8, 2013) ____ F.3d ____ [Dock. No. 10-56017].
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Elements of the storm water conveyance system are owned and operated by the City of San Diego. The runoff from the Airport includes run-on from outside the Airport property, and generally mixes with storm water from San Diego and the Port District.

The State Board's current RWL language and possible changes to it are issues of vital importance to the Airport Authority. Although the Airport Authority is more akin to an operator of a Phase II system, the Airport Authority is a permittee on the large MS4 Permit issued by the San Diego Regional Water Quality Control Board. As the State Board knows, the San Diego Regional Board recently reissued the large MS4 Permit as a Regional Permit containing the current RWL language *and* a requirement that all entities work to develop water quality improvement plans ("WQIPs") for the watersheds cover by the Regional Permit, including San Diego Bay. Unlike the LA Permit, the Regional Permit's WQIP requirements are mandatory and have no relationship to compliance with the RWL requirements. Instead, the Regional Permit continues the strict liability approach of the current RWL language, as it has been interpreted by the 9th Circuit Court of Appeals, while also imposing costly watershed planning requirements on the Airport Authority. The State Board should use this opportunity to adopt a precedential decision revising the RWL language to allow permittees to comply through alternative compliance pathways, including ones that work for special purposes entities such as the Airport Authority.

The State Board's current approach, particularly as applied in the context of the San Diego Regional Permit, creates significant problems for the Airport Authority for at least two main reasons. First, it requires the Airport Authority to achieve the impossible—strict compliance with water quality standards at all times in all receiving waters. The Clean Water Act does not require permittees to achieve the impossible.² Yet, the State Board's RWL language, as interpreted by the 9th Circuit³, appears to require the impossible. This requirement is particularly difficult for an entity such as the Airport Authority, which operates portions of a small MS4 system that receives commingled flows on a small, highly developed site where public safety must be the first priority.⁴ The Airport Authority is committed to continue to make water quality improvements, but should not be asked to do the impossible.

Second, the State Board's current RWL language, when combined with the WQIP requirements of the San Diego Regional Permit, creates unique hardships for the Airport Authority. Federal law restricts the ability of the Airport Authority to spend Airport revenue on anything other than

² *Hughey v. JMS Dev. Corp.* (11th Cir.) 78 F.3d 1523.

³ *Natural Resources Defense Council v. County of Los Angeles* (9th Cir. 2011), 673 F.3d 880, *rev'd on other grounds* by 133 S.Ct. 710 (2013).

⁴ This problem has been made worse by the 9th Circuit's August 8, 2013 decision. That decision appears to suggest that dischargers may be held jointly liable for receiving water exceedances, even without specific evidence that the individual discharger actually discharged the pollutants causing or contributing to the exceedance. To avoid such liability without evidence, dischargers will be compelled to turn inward and focus only on their discharges.



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capital or operating costs of the Airport.⁵ Violation of this federal requirement, which prohibits airport “revenue diversion,” may result in severe penalties, including withholding of payments under existing grants, modification of existing grants, withholding approval of future grants and civil penalties.⁶ Thus, although the Airport Authority may spend Airport revenue to address storm water discharges at the Airport, it may not spend such revenue to develop plans, implement activities and to otherwise address discharges in the broader San Diego Bay watershed. Any RWL language compliance option developed by the State Board must therefore allow for implementation on the jurisdictional level, and be sensitive to the unique spending limits applicable to the Airport Authority.

II. Why the Receiving Water Limitations Language Can and Should be Revised

The current RWL language, particularly as embodied in the San Diego Regional Permit, thus presents both fiscal and water quality challenges for the Airport Authority. Revising the RWL language could alleviate these challenges. Of course, the Authority must still be held accountable through specific, enforceable requirements. However, the State Board should use this opportunity to make meaningful revisions to the RWL language that continue to hold discharges accountable for their actions but also allow for flexible compliance approaches.

The State Board has the power to make such changes, and should do so through a state-wide precedential order. The legal support for the revisions to the RWL language is briefly set forth below.

A. Initial Development of the RWL Language

The current RWL language was originally developed based on what courts have subsequently made clear was a fundamental misunderstanding of requirements of the Clean Water Act. In 1991, the State Board concluded that Section 402(p)(3)(B) of the Act required MS4 permits to contain effluent limitations based on water quality standards in accordance with Section 301 of the Act.⁷ The State Board reasoned that Section 402(p)(3)(B) of the Act only modified the technology-based requirements of Section 301, and left in place the water quality-based requirements of Section 301, even if those requirements were more stringent than the maximum extent practicable (“MEP”) standard.

Subsequent State Board decisions expressly confirmed that the State Board intended the RWL language to implement Section 301(b)(1)(C)’s requirement that NPDES permit include technology-based requirements and more stringent effluent limitations necessary to meet water

⁵ 49 U.S.C. §§ 47107, 47111 and 47133(a); 64 Fed.Reg. 7696 (Feb. 16, 1999).

⁶ 49 U.S.C. §§ 47109, 47107, 47111.

⁷ State Board Order No. WQ 91-03.



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quality standards.⁸ Based on this misinterpretation of the Act, the State Board promulgated “the strongest and clearest possible language to protect water quality.” In 1999, the State Board refined its approach and issued the RWL language that currently applies to all MS4 permits.⁹

The confusion about whether Section 301 applied to Section 402(p)(3)(B) was understandable prior to 1999 because no precedential legal decision had yet addressed the question. In 1999, however, the 9th Circuit Court of Appeals unequivocally resolved this question.¹⁰ The 9th Circuit held that Section 402(p)(3)(B) was unambiguous and completely replaced the requirements of Section 301 for MS4 permits. Therefore, neither the technology-based nor water quality-based requirements of Section 301 applied to MS4 permits. In other words, the legal premise on which the State Board’s RWL language was based was wrong.

B. Clarification in the State Board’s 2001 BIA Order

In 2001, the State Board had the opportunity to clarify its RWL language in light of the 9th Circuit’s decision in *Browner*.¹¹ As the State Board acknowledged, it had not previously addressed the implications of *Browner* and the holding that MS4 permits did not need to require strict compliance with water quality standards. The State Board then properly interpreted its RWL language in a manner consistent with *Browner* and found that the language “does not require strict compliance with water quality standards.” Rather, compliance with water quality standards “is to be achieved over time, through an iterative approach requiring improved BMPs.”

The State Board declined to eliminate, as it could have done under *Browner*, the need to address water quality standards at all in MS4 permits in California. The State Board found that a technology-based standard alone would ignore the impacts urban runoff was having on receiving waters. The State Board thus pursued a middle course in which strict compliance with water quality standards would not generally be required, but where water quality standards would still be addressed through an iterative approach, which seeks compliance over time. This approach, the State Board found, “is protective of water quality, but at the same time considers the difficulties of achieving full compliance through BMPs that must be enforced throughout large and medium municipal storm sewer systems.”

The State Board’s 2001 precedential interpretation of the RWL language remains the State Board’s last precedential order on the subject. Had the iterative approach as articulated in the State Board’s 2001 Order been uniformly applied, many of the Airport Authority’s current concerns would have been ameliorated. Such an iterative approach establishes a high bar—the ultimate achievement of water quality standards—but also recognizes the difficulties faced by

⁸ State Board Order No. WQ 98-01.

⁹ State Board Order No. 99-05.

¹⁰ *Defenders of Wildlife v. Browner* (9th Cir. 1999) 191 F.3d 1159.

¹¹ State Board Order No. 2001-15.



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MS4s in achieving those standards because of the open nature of MS4 systems, significant variability in rainfall and technical and financial feasibility.

Unfortunately, not all the Regional Boards, nor the courts and third parties applied this language uniformly. Ultimately, the RWL language was interpreted based on the original misapplication of Section 301 to MS4 permits, and was applied to require strict compliance with water quality standard, as most recently reflected in the 9th Circuit's 2011 and 2013 decisions involving the 2001 LA permit.

C. The NRDC Case

The 9th Circuit in 2011 issued an opinion, subsequently reversed on other grounds, that interprets the State Board's RWL language to require strict compliance with water quality standards, uncoupled from the iterative process as expressed in the State Board's 2001 Order.¹² The 9th Circuit's opinion appears to turn the State Board's 2001 precedential decision on its head. Rather than finding the iterative process to be an integral part of the State's effort to achieve compliance with water quality standards over time through improved BMPs, the 9th Circuit held that strict compliance with water quality standards was required and was subject to independent enforcement separate from the iterative process.

The 9th Circuit's decision appears rooted in the same misunderstanding of Section 402(p)(3)(B) and Section 301 of the Act that existed at the time of the original development of the RWL language. The 9th Circuit quoted with support from non-MS4 cases that are based on the strict application of water quality standards. For example, the 9th Circuit noted that "[o]nly by enforcing the water-quality standards themselves as the limits could the purpose of the CWA and the NPDES system be effectuated." The 9th Circuit rejected the notion (which, of course, it previously had supported in *Browner*) that Section 402(p)(3)(B) was a "lesser standard." The 9th Circuit reasoned that "Defendants' position that they are subject to a less rigorous or unenforceable regulatory scheme for their storm-water discharges cannot be reconciled with the significant legislative history showing Congress's intent to bring MS4 operators under the NPDES-permitting system."

Although the 9th Circuit's decision was reversed by the United States Supreme Court on other grounds, its interpretation of the RWL language was not addressed by the Supreme Court. The 9th Circuit's decision can thus be interpreted as a fundamental shift away from the State Board's approach in its 2001 precedential order. To make matters worse, the 9th Circuit on August 8, 2013, on remand from the Supreme Court, reconsidered its previous opinion and again held the Los Angeles Flood Control District liable for the quality of the receiving water, even though

¹² *Natural Resources Defense Council v. County of Los Angeles* (9th Cir. 2011), 673 F.3d 880, *rev'd on other grounds by* 133 S.Ct. 710 (2013).
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there was no evidence of a discharge of the standard exceeding pollutants from the Flood Control District's MS4.¹³ The 9th Circuit's new decision emphasizes even more the need for RWL reform because it appears to hold permittees liable for the quality of the receiving waters absent any evidence of an individual contribution to the problem.

The Airport Authority acknowledges that some at the State Board and at the various Regional Board may believe that the 9th Circuit's decisions are consistent with the current RWL language and do not reflect a change in approach. However, this position appears hard to reconcile with an objective comparison of the statements in the State Board's 2001 precedential order (in which the State Board stated that its RWL language does not require strict compliance with water quality standards) with the 9th Circuit's decisions (in which the Court held that the RWL language requires strict compliance with water quality standards, apparently even absent evidence of an individual discharge).

D. The Current Situation and the State Board's Authority to Revise the RWL Language

The 9th Circuit's decisions have resulted in significant concerns from municipal discharges, who have requested that the State Board address the issue through a reconsideration of its current RWL language. The issue has been raised directly with the State Board in connection with the Caltrans Permit and the Phase II Permit. The issue was also the crucial policy issue raised in connection with the LA Permit and the San Diego Regional Permit, both of which are subject to pending petitions to the State Board. Resolution of the RWL language issue by the State Board is the most important pending MS4 policy question.

Some have asserted that the State Board lacks the legal authority to consider changes to its current RWL language. The Airport Authority believes that the State Board has discretion on the question and that neither the anti-backsliding nor the anti-degradation provisions of the Act or state law preclude the State Board from addressing the RWL language, as briefly explained below.

1. Anti-Backsliding

Some have asserted that the anti-backsliding provisions of the Act and federal regulations preclude any changes to the RWL language. A careful reading of the Act and the regulations demonstrate otherwise.

¹³ In its 2011 opinion, the 9th Circuit had rejected the contention that the mass-emissions monitoring station data conclusively established the Flood Control District's liability. The 9th Circuit held that there must be some additional proof of the Flood Control District's individual contribution to the water quality exceedance. However, on August 8, 2013, the reconsidered this argument and held that the monitoring data only established liability, even absent evidence of the District's individual contribution.



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Section 402(o) of the Act provides that for specific effluent limitations established on the basis of specific sections of the Act, a permit may not be renewed or reissued that contains effluent limitations which are less stringent than the comparable effluent limitations in the previous permit. There are several reasons why Section 402(o) has no application to the RWL language.

First, the RWL language is not an “effluent limitation” as defined in the Act. An “effluent limitation” is “any restriction established by a State or the Administrator on quantities, rates, and concentrations of chemical, physical, biological, and other constituents *which are discharged from point sources* into navigable waters, the waters of the contiguous zone, or the ocean, including schedules of compliance.”¹⁴ An “effluent limitation” is thus a limit measured at the point of discharge from a point source. In contrast, the RWL language measures compliance in the receiving water.

Second, even if the RWL language could be characterized as an “effluent limitation,” it is not (and could not be) developed in accordance with the specific sections listed in Section 402(o). It is not a technology-based effluent limitation established based on best professional judgment in accordance with Section 402(a)(1)(B). Rather, it derives its legal authority from Section 402(p)(3)(B). Moreover, as *Browner* makes clear, the RWL language is not (and could not be) a technology-based or water-quality based effluent limitation established on the basis of Section 301(b)(1)(c) because Section 301 has no application to MS4 permits. This is true because Section 402(p)(3)(B) replaces in its entirety the requirements of Section 301. Finally, the RWL language is not an effluent limitation developed under Section 303(d) or (e), which involve the continuing planning process and TMDLs. The RWL language is, at its core, an exercise of the State Board’s discretion under the “such other provisions” language of Section 402(p)(3)(B)(iii) and is not subject to Section 402(o).

The federal regulations also contain anti-backsliding provisions.¹⁵ These regulations must be addressed in NPDES permits “when applicable.” Due to the unique nature of MS4s and the special standards Congress created in Section 402(p)(3)(B) for such systems, these regulations are not “applicable” to MS4 permits. The regulations provide that “interim effluent limitations, standards or conditions” of renewed or reissued permits must be at least as stringent as the final effluent limitations, standards or conditions in the previous permit. For the same reasons as discussed above regarding Section 402(o), these regulations do not apply to MS4 permits. It is commonly recognized that these regulations do not govern requirements based on state water quality standards.¹⁶ Because the RWL language is, at its core, intended to protect state water quality standards, these regulations have no application to the RWL language.

¹⁴ 33 U.S.C. §502(11)(Emphasis added).

¹⁵ 40 CFR § 122.44(l).

¹⁶ See, e.g., NPDES Permit Writers’ Manual, page 7-4.



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2. Anti-Degradation

EPA's regulations require that each state develop and adopt a statewide anti-degradation policy and identify the methods for implementing such policy.¹⁷ California adopted its anti-degradation policy in 1968.¹⁸ The State Board has issued guidance on its policy through Administrative Procedures Update ("APU") 90-004.

As APU 90-004 makes clear, the State's anti-degradation policy does not apply when a discharge "will not be adverse to the intent and purpose of the state and federal anti-degradation policies." Likewise, APU 90-004 provides that if there is "no reason to believe that existing water quality will be reduced due to the proposed action, no anti-degradation analysis is required." As noted above, revisions to the RWL language will allow MS4s through-out the State to better address water quality problems and will lead to better water quality outcomes. Thus, there is no reason to believe that revisions to the RWL language will reduce existing water quality. Therefore, the anti-degradation policy does not apply.

This analysis is consistent with recent case law regarding anti-degradation. In a recent case, the court acknowledged that the anti-degradation policy might not apply if it can be shown that the discharge of waste will not degrade the quality of the receiving water.¹⁹ To support such a conclusion, a water board must ensure that the regulatory action includes sufficient requirements, including an effective monitoring program, to demonstrate that the discharge will not degrade the quality of the receiving water. MS4 permits contain such requirements, including an effective monitoring program. Therefore, the anti-degradation provisions do not apply.

III. Responses to Two Questions

With the above legal framework in mind, the Airport Authority has the following responses to the two questions posed by the State Board. In the Airport Authority's view, the RWL language must be amended to include a compliance program option that includes the following key elements: it must be voluntary; it must allow for a jurisdictional approach that would address the unique spending limits placed on the Airport Authority; it must allow for a best management practices approach; it must allow for prioritization of pollutant-water body combinations; it must permit adaptive management; and it must provide that good faith compliance with the program constitutes compliance with receiving water limitations and discharge prohibitions. The Airport Authority's answers below are based on these key elements.

¹⁷ 40 CFR 131.12.

¹⁸ State Board Resolution No. 68-16.

¹⁹ *Asociacion De Gente Unida Por El Agua v. Central Valley Regional Water Quality Control Board* (2012) 210 Cal.App.4th 1255.



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A. General Support for Compliance Approach in the LA Permit

The Airport Authority generally supports the LA Permit's compliance approach as a good first step toward revising the RWL language. The approach is properly an optional one that allows permittees to decide whether the current language or a different approach works best for the Airport Authority. The approach can be implemented on a jurisdictional level that would address the unique spending limits placed on the Airport Authority. It also contains sufficient rigor to provide measurable and enforceable requirements that permittees must meet. Although somewhat cumbersome, the Airport Authority views the LA approach as a good first step and commends the Regional Board for its attempt to address the RWL issue. To fully address the issue, however, additional language rooted in the iterative process is required.

B. Support for CASQA's Improvements to the LA Permit's Approach

Although the Airport Authority views the LA Permit's approach as a good first step, the Airport Authority believes that the language requires further refinement. The Airport Authority also supports the RWL language put forward by CASQA in its response to the State Board's two questions as an additional step toward true RWL reform. CASQA's refinements to the LA approach makes the compliance program process more usable and comprehensive.

Moreover, the State Board should additionally consider including in the revised RWL language a mechanism to address those situations where, despite good faith efforts, achievement of water quality standards, including interim and final wasteload allocations/effluent limitations, proves to be currently infeasible. Building such a mechanism into the RWL compliance process now will avoid future disputes and will establish a comprehensive structure through which the State and Regional Boards can work collaboratively with MS4s to achieve water quality standards.

IV. Conclusion

The Airport Authority appreciates the opportunity to provide these comments to the State Board and looks forward to the State Board workshop on the topic. It urges the State Board to use this opportunity to make meaningful revisions to the RWL language.

Very truly yours,

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cc: Lee S. Kaminetz, Senior Attorney
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**SWRCB/OCC FILE NOS. A-2236(a) through (kk)
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<p>[via U.S. Mail and email] Liz Crosson, Esq. Tatiana Gaur, Esq. Los Angeles Waterkeeper 120 Broadway, Suite 105 Santa Monica, CA 90401 liz@lawaterkeeper.org tgaur@lawaterkeeper.org</p>	<p><u>City of Lynwood [A-2236(ff)]:</u></p> <p>[via U.S. Mail and email] Fred Galante, Esq., City Attorney David D. Boyer, Esq., Special Counsel Wesley A. Millband, Esq., Special Counsel Aleshire & Wynder, LLP 18881 Von Karman Avenue, Suite 1700 Irvine, CA 92612 dboyer@awattorneys.com wmillband@awattorneys.com fgalante@awattorneys.com</p>

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<p>[via U.S. Mail and email] City of Gardena c/o Mr. Mitch Lansdell, City Manager 1700 West 162nd Street Gardena, CA 90247 mlansdell@ci.gardena.ca.us</p>	<p>[via U.S. Mail and email] City of Irwindale c/o Mr. Kwok Tam, City Engineer Public Works Department 5050 North Irwindale Avenue Irwindale, CA 91706 ktam@ci.irwindale.ca.us</p>
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<p><u>City of Westlake Village [A-2236(p)]:</u></p> <p>[via U.S. Mail and email] Lisa Bond, Esq. Candice K. Lee, Esq. Andrew J. Brady, Esq. Richards, Watson & Gershon 355 South Grand Avenue, 40th Floor Los Angeles, CA 90071 lbond@rwqlaw.com clee@rwqlaw.com abrady@rwqlaw.com</p>	<p><u>City of Signal Hill [A-2236(iii)]:</u></p> <p>[via U.S. Mail and email] David J. Aleshire, Esq., City Attorney David D. Boyer, Esq., Special Counsel Wesley A. Miliband, Esq., Special Counsel Aleshire & Wynder, LLP 18881 Von Karman Avenue, Suite 1700 Irvine, CA 92612 daleshire@awattorneys.com dboyer@awattorneys.com wrmiliband@awattorneys.com</p>
<p>[via U.S. Mail and email] City of Westlake Village c/o City Manager 31200 Oak Crest Drive Westlake Village, CA 91361 ray@wlv.org beth@wlv.org</p>	<p>[via U.S. Mail and email] City of Signal Hill c/o Mr. Kenneth Farfing City Manager 2175 Cherry Avenue Signal Hill, CA 90755 kfarfing@cityofsignalhill.org</p>
<p><u>City of La Mirada [A-2236 (a)]:</u></p> <p>[via U.S. mail and email] Lisa Bond, Esq. Candice K. Lee, Esq. Andrew J. Brady, Esq. Richards, Watson & Gershon 355 South Grand Avenue, 40th Floor Los Angeles, CA 90071 lbond@rwqlaw.com clee@rwqlaw.com abrady@rwqlaw.com</p>	<p><u>City of Redondo Beach [A-2236(ii)]:</u></p> <p>[via U.S. Mail and email] Lisa Bond, Esq. Candice K. Lee, Esq. Andrew J. Brady, Esq. Richards, Watson & Gershon 355 South Grand Avenue, 40th Floor Los Angeles, CA 90071 lbond@rwqlaw.com clee@rwqlaw.com abrady@rwqlaw.com</p>
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<p><u>City of Manhattan Beach [A-2236(r)]:</u></p> <p>[via U.S. Mail and email] Lisa Bond, Esq. Candice K. Lee, Esq. Andrew J. Brady, Esq. Richards, Watson & Gershon 355 South Grand Avenue, 40th Floor Los Angeles, CA 90071 lbond@rwqlaw.com clee@rwqlaw.com abrady@rwqlaw.com</p>	<p><u>City of West Covina [A-2236(kk)]:</u></p> <p>[via U.S. Mail and email] Anthony Marinaccio, Esq. Alvarez-Glasman & Colvin 13181 Crossroads Parkway North West Tower, Suite 400 City of Industry, CA 91746 amarinaccio@agclawfirm.com</p>

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<p>[via U.S. Mail and email] City of Covina c/o City Manager 125 East College Street Covina, CA 91273 vcastro@covinaca.gov</p>	<p>Additional Interested Party By Request:</p> <p>[via U.S. Mail only] Andrew R. Henderson, Esq. General Counsel Building Industry Legal Defense Foundation 17744 Sky Park Circle, Suite 170 Irvine, CA 92614 ahenderson@blasc.org</p>
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City of Norwalk
c/o Daniel R. Garcia, City Engineer
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City of Palos Verdes Estates
c/o Allan Rigg, Director of Public Works
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City of Paramount
c/o Christopher S. Cash
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City of Pasadena
c/o Stephen Walker
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c/o Art Cervantes
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City of Pomona
c/o Julie Carver
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City of Rancho Palos Verdes
c/o Ray Holland
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City of Redondo Beach
c/o Mike Shay
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City of Rolling Hills
c/o Greg Grammer
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City of Rolling Hills Estates
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City of Rosemead
c/o Chris Marcarello
Director of Public Works
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City of San Dimas
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City of San Fernando
c/o Ron Ruiz
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City of San Gabriel
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City of San Marino
c/o Chuck Richie
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City of Santa Clarita
c/o Travis Lange
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City of Santa Fe Springs
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City of Santa Monica
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City of Sierra Madre
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City of South El Monte
c/o Anthony Ybarra, City Manager
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City of South Gate
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City of Walnut
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City of Westlake Village
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City of Whittier
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Director of Public Works
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County of Los Angeles
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Los Angeles County Flood Control District
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