

California Regional Water Quality Control Board, San Diego Region

April 4, 2016

VIA E-MAIL

Ryan Mallory-Jones, Attorney
Office of Chief Counsel
State Water Resources Control Board
1001 I Street, 22nd Floor
Sacramento, CA 95812
Ryan.Mallory-Jones@waterboards.ca.gov

Dear Mr. Mallory-Jones:

Re: SWRCB/OCC FILE A-2456(a)-(I); REQUEST FOR EXTENSION OF TIME TO FILE RESPONSES TO PETITIONS AND TO FILE THE ADMINISTRATIVE RECORD

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) received the March 15, 2016, Complete Petition letter for the above-referenced petitions. The Complete Petition letter requires that any responses to the petitions be filed within 30 days and requests that the San Diego Water Board file the administrative record within the same time period.

For the reasons set forth below, the San Diego Water Board requests a minimum of thirty (30) additional days to file responses to the petitions and to file the administrative record in this matter.

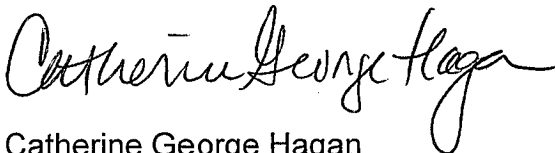
The above-referenced SWRCB/OCC File includes twelve separate petitions for review of San Diego Water Board Order No. R9-2015-0100. Order No. R9-2015-0100 amends the San Diego Water Board's Regional MS4 Permit, Order No. R9-2013-0001, adopted by the Board in May 2013. Order No. R9-2013-0001 was subsequently amended in February 2015 by adoption of Order No. R9-2015-0001. Numerous petitions for review of both prior Orders were also filed but remain in abeyance. (See SWRCB/OCC File A-2254(a)-(p) and SWRCB/OCC File A-2376(a)-(i).) In addition to raising new issues, many of the petitions in SWRCB/OCC File A-2456(a)-(I) specifically incorporate issues and related legal arguments identified in previously filed petitions. Therefore, it is time consuming to determine the universe of issues and arguments to which the San Diego Water Board may want to respond and then to prepare those responses. Moreover, the San Diego Water Board intends to prepare an electronically searchable administrative record and index similar to the one prepared for SWRCB/OCC File A-2239(a)-(c) (Eastern San Joaquin River Watershed Agricultural Order) to facilitate State

Water Board review of the petitions. Because Order No. R9-2015-0100 amends the previously amended Regional MS4 Permit, the administrative record for this matter spans several years and the task of preparing a user-friendly administrative record is likewise time-consuming.

California Code of Regulations, title 23, section 2050.5(a) provides that the State Water Resources Control Board may extend the time for filing a response to a petition or the time for filing the administrative record. For the reasons set forth above, the San Diego Water Board requests that the time for filing responses and the administrative record be extended by a minimum of thirty days. The Board appreciates your consideration of its request.

Please contact me by phone or e-mail if you have any questions. I can be reached at (619) 521-3012 or by e-mail at Catherine.Hagan@waterboards.ca.gov.

Sincerely,



Catherine George Hagan
Senior Staff Counsel
Office of Chief Counsel
State Water Resources Control Board

cc: Distribution List for SWRCB/OCC File A-2456(a thru l)