



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

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Dr, John Zhu

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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". The signature is fluid and cursive, with a large initial "S" and "J".

Steve Jepsen, Executive Director