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Submission via Email to: david.nahai@waterboards.ca.gov

November 10, 2025

Chair David Nahai
Los Angeles Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013-2343

RE: CII Coalition Comments – Request to Reject Adoption of Draft Permit

Dear Chair Nahai:

On behalf of the signatories to this letter, we urge the members of the Los Angeles Regional Water Quality Control Board (Board) to reject the adoption of the draft proposed Commercial, Industrial & Institutional Permit (CII Permit) and instead direct staff to work directly with stakeholders to resolve outstanding concerns and lack of clarity with the CII Permit provisions and compliance options.

Despite submission of robust written comments over the past few years and efforts to work with the Board, significant concerns remain with the CII Permit including overly burdensome, duplicative, costly and unclear requirements and compliance details. Hundreds of prospective permittees across commercial, industrial and institutional sectors in the designated watersheds will be affected, many of whom have never had to comply with such a permit before. Although staff has made a few changes to address some of the concerns, the changes do not go far enough to address the concerns, ambiguities, and significant costs that will be borne by prospective permittees.

Further, while we appreciate the inclusion and creativity associated with Compliance Option 1, the option lacks meaningful and important details to enable prospective permittees to assess and determine whether it is a workable option and at what cost. Absent additional details and clarity, we are highly concerned it will not be a compliance option that can be utilized. Additionally, while it is helpful that the timeline for choosing and implementing a compliance option has been extended, the process for the watershed management groups to establish a legal entity to collect fees and administer the compliance option and associated details could take the entire timeframe, hindering it as a real option for compliance purposes – not to mention little clarity for prospective permittees to make an informed decision whether to utilize the option and at what cost.

Finally, this is the first permit of its kind in California. In this regard, it is critically important that the Board get this CII Permit right rather than advance a permit that continues to have significant issues. Failure to address these significant concerns could very well lead to an appeal or challenge on the CII Permit before it gets off the ground for implementation.

In this regard, we urge the Board to direct staff to work on addressing the outstanding issues and concerns with stakeholders prior to adoption of the CII Permit.

Sincerely,

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