

# AGUA DULCE TOWN COUNCIL

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March 17, 2023

Mr. Philip Wyels, Esq.  
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Via Email to: [Philip.Wyels@waterboards.ca.gov](mailto:Philip.Wyels@waterboards.ca.gov)

**RE:** AGUA DULCE TOWN COUNCIL COMMENT LETTER AS AN INTERESTED PARTY REFERENCED IN THE PETITION OF CYNTHIA GRIMES, JOHN BRUNOT, AGUA DULCE NEIGHBORS, SUSAN TURNER, AND MARCY AND GLEN WINTER FOR REVIEW OF WASTE DISCHARGE REQUIREMENTS ORDER NO. R4-2022-066 FOR THE AGUA DULCE RESIDENTIAL DEVELOPMENT PROJECT, AGUA DULCE, LOS ANGELES COUNTY; ISSUED BY THE LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD: **SWRCB/OCC FILE A-2799**

Dear Mr. Wyels:

The Agua Dulce Town Council (The Council) appreciates the opportunity to submit comments on the above captioned petition. The petition highlights a number of concerns regarding the manner in which certain approvals have been granted by the Los Angeles Regional Water Quality Control Board for the Agua Dulce Residential Project (TR-50385) in view of the terms and conditions that are spelled out in the approved 1994 Environmental Impact Report and the approved 2007 Supplemental Environmental Impact Report. The Council agrees with these concerns and supports the petition. Please accept these comments as well as all previous comments sent by The Council to the Los Angeles Water Quality Control Board (copies attached) into the public record regarding SWRCB/OCC file A-2799.

**1. Construction of the Wastewater Treatment Plant is a condition precedent for the entire project as a result of the approval of the 2007 Supplemental EIR**

The Council's view is that the submission of approved plans for, and the construction of the onsite wastewater treatment plant became a condition precedent to the approvals related to the grading and construction of all phases of the project (both recorded and unrecorded) upon the approval of the 2007 Supplemental Environmental Impact Report (SEIR).

This view is based on clear, unambiguous statements contained in the approved 2007 SEIR and also the verbal statements made to The Council by the then developer's representative at the February 14<sup>th</sup> 2007 meeting of the Agua Dulce Town Council where the developer was seeking the community of Agua Dulce's support for the revised project.

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Pursuant to the California Environmental Quality Act (CEQA), the 1994 EIR and the 2007 SEIR form a singular description of the project's impact on the environment and the two do not operate independently of each other.

When the Agua Dulce Residential Project was first approved in 1994, it was to have used an offsite wastewater treatment plant at the proposed Rio Dulce Project, located to the southwest of the Agua Dulce Residential Project site. Twelve construction phases of the Agua Dulce Residential Project were contemplated at the time. The project-wide wastewater entitlement laid out in the 1994 EIR permitted the construction of the first three phases totaling 68 homes with both on-site septic systems and dry sewer lines for subsequent connection to the offsite wastewater treatment plant. The 1994 EIR prohibited the issuance of permits for any further phases of the project beyond the first 68 homes until the connection to the offsite wastewater treatment plant had been made.

The developer recorded the first three phases of the Agua Dulce Residential Project in 2002 however no construction activity on the first 68 homes occurred between 2002 and 2022.

After the Rio Dulce project was abandoned, the developer of the Agua Dulce Residential Project was required to revise the waste disposal and treatment plans, resulting in the Supplemental Environmental Impact Report that introduced an on-site wastewater treatment plant. The project-wide wastewater entitlement described in the 2007 SEIR is one whereby the onsite wastewater treatment plant will operate "**instead of**" the previously approved onsite septic systems and the offsite wastewater treatment plant. This is clearly described in the 2007 SEIR and its supporting documents in the planning record.

Furthermore, when the then developer's representative, Vice President Mr. Dennis Bushore, appeared before the Agua Dulce Town Council on February 14<sup>th</sup> 2007 seeking the community's support for the revised project, the video of his presentation clearly captures the intent to construct the wastewater treatment plant in parallel with the first three phases of the project and not to use septic systems at all on the project site. At the time this presentation was made in February 2007, the approved wastewater entitlement from the 1994 EIR allowed the construction of the first 68 homes with on-site septic systems, however upon approval of the 2007 SEIR a couple of months later in April 2007, the project wide wastewater entitlement was changed to an onsite wastewater treatment plant instead of the previously proposed on-site septic systems and the offsite wastewater treatment plant.

The wastewater treatment entitlement expressed in the 2007 SEIR is not some misinterpretation of the developer's true intent; it is an accurate reflection of what the developer explained to the community and The Council to elicit support for the revised project. The excerpt of the February 14<sup>th</sup> 2007 Agua Dulce Town Council meeting video can be downloaded from this link (<https://1drv.ms/f/s!Ahebbn1twn7CiSiulq-YN8UegxKn?e=dGMIYe>) and we respectfully request that this video be made part of the record since it clearly validates the developer's stated intent with respect to project-wide wastewater treatment for the Agua Dulce Residential Project shortly before the 2007 SEIR was approved.

## **2. The plans for the Wastewater Treatment Plant remain 'conceptual' at this time**

The 2007 SEIR contains an letter from the Los Angeles County Department of Public Works noting that "*due to **incomplete and inadequate Treatment Plant Feasibility Study and treatment plant plans, during the design stage review, additional requirements to the treatment plant facility, the treatment process, and/or methods of disposal may necessitate a change to the environmental documents and/or a revision to the tentative map.***"

Since the proposed Wastewater Treatment Plant is located within the as-yet unrecorded portion of the project site, the developer has sought to extend the unrecorded map as allowed under the State's Subdivision Map Act.

At the meeting of the Los Angeles County Department of Regional Planning Hearing on January 6<sup>th</sup> 2015, it was noted that the Los Angeles County Department of Sanitation estimated that it would take 5 years to

review and approve the onsite wastewater treatment plant plans. Consequently, a five year map extension until April 11th 2021 was granted.

At the February 10th 2022 meeting of the Los Angeles Regional Water Quality Control Board, board Member David Nahai sought to clarify the status of the wastewater treatment plant with the developer's legal representative under oath. Around 2 hours and 36 minutes into the meeting, the developer's legal representative indicated that 'I honestly don't know when that permit [for the wastewater treatment plant] will be submitted to this board for consideration, but that will be its own lengthy process and will involve a similar, much grander process that we went through today. It does require more analysis.'

At the September 20<sup>th</sup> 2022 meeting of the Los Angeles County Department of Regional Planning Hearing, the sixth and final extension of the unrecorded map was granted until October 11th 2023. During this meeting, the legal representative for the developer stated that the developer had engaged a civil engineering company who has worked on similar wastewater treatment system projects in the Santa Clarita area. The legal representative was circumspect as to whether any such plans could or would be completed before the unrecorded map expires for the final time in October 2023.

Given the history outlined above, it is difficult to envisage that a wastewater treatment project plan that was estimated would take 5 years to complete by the Department of Sanitation can be completed within the next 7 months before the unrecorded map expires for the final time on October 11th 2023. A wastewater treatment plant has been a critical and necessary component both for this project and for the treatment of wastewater from the adjacent 61 homes in the Sierra colony development (Tract 48786) since it was first approved in 1994. Evidently the wastewater treatment plant is of such importance that the necessary plans for it along with a description of its environmental impact are still not produced and approved nearly 29 years later!

Should the unrecorded map where the proposed wastewater treatment plant and an additional 247 homes are located expire, as seems increasingly likely, there can be no guarantee that a subsequent Environmental Impact Report would be approved, particularly in view of the State Attorney General's recent track record of blocking similar subdivision development in rural areas around California. Any such EIR would need to conform to 21<sup>st</sup> century regulations for the construction of subdivisions in high fire hazard severity zones. In its April 12<sup>th</sup> 1993 comment letter that is part of the record for the approved 1994 EIR, The Council noted that the wastewater treatment plant may not be built and that the environmental impact of such an outcome on the local groundwater needed to be addressed in the original EIR (the potential impact of permanent septic systems was never addressed).

### **3. The Supplemental EIR DOES APPLY to Phase 1 of the Agua Dulce Residential Project**

Around 52 minutes into the February 10th 2022 meeting of the Los Angeles Regional Water Quality Control Board, staff member Celine Gallon states as part of her presentation to the board that 'The Los Angeles Board, in its capacity as a responsible agency, has considered the EIR and concluded no additional analysis is required. We have reviewed and considered the 2007 Supplemental EIR, but it was developed for Phase 2 of the Agua Dulce Project. It does not apply to Phase 1 of the project and the tentative WDR is related to Phase 1.'

Later in the meeting, at around the 2 hour 25 minute mark, the developer's legal representative further endorsed this falsehood by stating that the staff's responses to comments were entirely correct!

This is an egregious misrepresentation of the facts by a staff member. In the March 2007 Staff Recommendation to the Planning Commission in support of the Supplemental EIR (which is part of the public planning record for the SEIR that Ms. Gallon indicated had been reviewed), in the section entitled 'Environmental Documents' on Page 6, it clearly states that "The Draft Supplemental EIR addresses the changes proposed by RVTM 50385, **which affect both the previously recorded and currently unrecorded portions of the project.**"

The theory advanced by staff and the developer's legal counsel that the recorded portion of the project was unaffected by the Supplemental EIR is baseless and appears to have been intended to mislead the board members over the extent to which the 2007 SEIR had fundamentally changed the entire project's wastewater entitlement. The board reached their decision in no small part due to the representations by staff (Ms. Celine Gallon and Tamarin Austin Esq.) that the 2007 Supplemental EIR had no bearing on the developer's right to construct the first three recorded phases of the project with individual septic systems.

**4. The Los Angeles Regional Water Quality Control Board has previously expressed concerns over the impact of the Agua Dulce Residential Project on the local groundwater**

On February 12<sup>th</sup>, 1993, Ms. Debbie Smith, Chief of the Planning Unit of the Los Angeles Region of the California Regional Water Quality Control Board wrote to the Los Angeles County Department of Regional Planning raising the following concerns related to the proposed project:

- The Regional Board had identified the project area as an area of potentially impaired groundwater. Therefore, a hydrogeologic study may be required which addresses cumulative as well as local effects on groundwater
- The Regional Board disagreed with the statement in Table 1-1 that no significant impacts and no degradation in the quality of the groundwater will occur with the use of septic systems serving the project site. The Regional Board stated that **the entire twelve phase development project will likely have a significant local and cumulative negative impact to water quality in the Agua Dulce groundwater basin.**

On page/section 4-3-3 of the Response to Comments that accompanied the 1994 EIR, the record reflects that the applicant and the County had subsequently agreed to utilize the regional sewage treatment plant, thereby precluding significant local and cumulative impacts on groundwater.

Consequently, no hydrogeologic study that addressed the cumulative and local impacts on the groundwater of the septic systems was ever conducted since the assumption was made that the groundwater from all phases of the project would be treated in the wastewater treatment plant, as approved in the 2007 Supplemental EIR.

Since the wastewater treatment plant remains conceptual at the time of writing this letter, and the unrecorded map on which it is located will expire for the final time in 7 months on October 10th 2023, it is entirely conceivable that any septic systems installed on the first three phases of the project may become permanent and therefore a hydrogeologic study and an accompanying environmental impact report is required before any such systems could be permitted as was identified by the Regional Water Quality Control Board in February of 1993.

**5. There is no longer a wastewater entitlement under which septic systems can be permitted**

At the time of recording the first three phases of the project in 2002, the developer had secured a permit from the Regional Water Board to install septic systems for the wastewater treatment of the first 68 homes on the project (Order No. 91-94, CI No. 7185, Global ID. WDR 100000261, WDID NO. 4A196500013).

Following approval of the Supplemental EIR in 2007 that restated the project's wastewater entitlement and replaced the septic systems with the onsite wastewater treatment plant, the developer formally terminated the septic permit in April 2012 since, in the developer's own words; they no longer needed the septic system WDR. This was noted by staff member Ms. Celine Gallon during the February 10th 2022 meeting when she indicated around 48 minutes into the meeting that since the developer was proposing to install individual septic systems on the first 68 homes that they would need to secure authorization from the Los Angeles County Department of Public Health.

In light of the restatement of the entire project's wastewater entitlement by virtue of the approval of the 2007 Supplemental EIR that applied to both the recorded and unrecorded phases of the project, there is

no longer an approved wastewater entitlement to install onsite septic systems anywhere on the recorded or unrecorded portions of the project.

As such, should the developer plan to construct the first 68 homes with individual onsite septic systems, a Supplemental Environmental Impact Report is required under CEQA that addresses the environmental impact(s) of the use of septic systems on the local groundwater and mitigates the concerns identified by the Regional Water Control Board and The Council in 1993.

## **6. The Regional Water Quality Control Board's decision to issue the dredge and fill WDR permit is not consistent with the terms of the Porter-Cologne Water Quality Control Act**

According to Section § 106.3 of the Porter-Cologne Water Quality Control Act, the established policy of the state is that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. All relevant state agencies, including the state water resources control board, shall consider this state policy when revising, adopting, or establishing policies, regulations, and grant criteria.

Pursuant to Section § 13000 the Legislature finds and declares that the people of the state have a primary interest in the conservation, control, and utilization of the water resources of the state, and that the quality of all the waters of the state shall be protected for use and enjoyment by the people of the state. It is the intent of the Legislature that the state board and each regional board shall be the principal state agencies with primary responsibility for the coordination and control of water quality.

According to Section § 13050, "Quality of the water" refers to chemical, physical, biological, bacteriological, radiological, and other properties and characteristics of water which affect its use.

"Water quality control" means the regulation of any activity or factor which may affect the quality of the waters of the state and includes the prevention and correction of water pollution and nuisance.

"Contamination" means an impairment of the quality of the waters of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of disease. "Contamination" includes any equivalent effect resulting from the disposal of waste, whether or not waters of the state are affected.

"Pollution" means an alteration of the quality of the waters of the state by waste to a degree which unreasonably affects either of the following:

- (A) The waters for beneficial uses.
- (B) Facilities which serve these beneficial uses.

"Pollution" may include "contamination."

"Nuisance" means anything which meets all of the following requirements:

- (1) Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.
- (2) Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
- (3) Occurs during, or as a result of, the treatment or disposal of wastes.

According to Section § 13169, the state board is authorized to develop and implement a groundwater protection program as provided under the Safe Drinking Water Act, Section 300. Pursuant to § 13225, each regional board, with respect to its region, shall coordinate with the state board and other regional boards, as well as other state agencies with responsibility for water quality, with respect to water quality control matters, including the prevention and abatement of water pollution and nuisance.

With respect to individual onsite waste disposal systems, Section § 13281(a) requires the regional board to consider all relevant evidence related to the discharge including the possibility of unsuitable hydrogeologic conditions. According to Section § 13283, in reviewing any determination that discharge of waste from new individual disposal systems should not be permitted, the state board shall include a preliminary review of possible alternatives necessary to achieve protection of water quality and present and future beneficial uses of water, and prevention of nuisance, pollution, and contamination, including, but not limited to, community collection and waste disposal systems which utilize subsurface disposal,

and possible combinations of individual disposal systems, community collection and disposal systems which utilize subsurface disposal, and conventional treatment systems.

In this instance, as noted in Section 4 of this letter, a hydrogeologic study that would satisfy the requirement of § 13281 has never been performed, even though it was identified as being necessary by the Regional Water Quality Control Board in their 1993 comment letter. As such, there is no information available that could be used to determine whether the developer's stated goal of using individual onsite septic systems would not further impair the quality of the groundwater with contamination that becomes a nuisance for other property owners who currently use the same groundwater as their primary source of drinking water. Under Section § 13169, it is the responsibility of the Los Angeles Regional Water Quality Control Board to prevent and abate water pollution and nuisance and they have failed in their duty to do so in this case.

In Section § 13300, whenever a regional board finds that a discharge of waste is taking place or threatening to take place that violates or will violate requirements prescribed by the regional board, or the state board, the board may require the discharger to submit for approval of the board, with such modifications as it may deem necessary, a detailed time schedule of specific actions the discharger shall take in order to correct or prevent a violation of requirements.

In this instance, the developer's sworn testimony before the regional board in February 2022 confirms their intent to construct the first three phases of the project totaling 68 dwellings using individual onsite wastewater septic treatment systems which are outside the scope of the approved 2007 wastewater entitlement for the entire project. Since the revised wastewater entitlement approved in 2007 includes an as yet unspecified onsite wastewater treatment plant, the water board would have every right to deny the use of individual septic systems since a viable alternative is already part of the approved 2007 wastewater entitlement. Given that the developer has yet to provide any concrete plans for the onsite wastewater treatment plant, the board is permitted under Section § 13300 to request a detailed time schedule of specific actions the developer will take in order to prevent a violation of requirements by submitting the necessary plans and securing approval of the accompanying environmental documents for the construction of the onsite wastewater treatment plant.

Finally, Section § 13381 allows that waste discharge requirements or dredged or fill material permits may be terminated or modified for cause, including, but not limited to, all of the following:

- (a) Violation of any condition contained in the requirements or permits.
- (b) Obtaining the requirements by misrepresentation, or failure to disclose fully all relevant facts.
- (c) A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge.

In this instance, it appears that both regional water quality control board staff and the developer's legal representative failed to fully disclose all the relevant facts to the regional board prior to and during the February 2022 meeting, and therefore the dredge and fill permit may be terminated for cause under Section § 13381(b).

#### **7. The water supply agreement for the unrecorded portion of the project that includes the proposed wastewater treatment plant has not been secured**

In November 2018, the then-developer of the project submitted the attached Form WW-172 application for a new metered water service connection in a Los Angeles county waterworks district. Section B of the Form WW-172 includes Request #2 that states "Critical to confirm the availability of water supply for the remainder of the project."

Over three years after this critical issue had been identified by the County of Los Angeles, during the February 2022 Los Angeles Regional Water Quality Control Board meeting, board member David Nahai sought to clarify the status of the water supply for the project. Around 2 hours 30 minutes into the meeting, during an exchange under oath with the developer's legal representative, the legal representative indicated that the agreement to supply water had only been obtained for the first three

phases of the project (totaling 68 units) and that the developer had not applied for the water supply for the further unrecorded phases of the project.

The Council submitted a public records request to the Los Angeles County Department of Public Works in February 2023 seeking “All information provided by the previous and current project owner(s) that confirm the availability of water supply for the remainder of the project (the 247 homes that are planned for the as-yet unrecorded portion of the project) that was requested pursuant to 'critical' Request #2 at the bottom of page 1 of the November 2018 Form WW-172”. The response received on March 16<sup>th</sup> 2023 to this PRR (Reference Number 5431) was that the Los Angeles County Department of Public Works could find no records responsive to this request.

It is now almost four and a half years since the need to confirm the availability of potable water supplied via Waterworks District 37 from the Antelope Valley East Kern Water Agency for the unrecorded portion of the project was flagged by Los Angeles County as a ‘critical’ issue. This includes the water supply for the proposed wastewater treatment plant that is to be sited on the unrecorded portion of the project. The fact that this water supply issue remains unresolved, despite being previously identified as a ‘critical’ issue, underscores The Council’s previously expressed concern that the unrecorded portion of the project may expire in October 2023 leaving the project without the necessary wastewater treatment plant.

## **8. The petitions appear to have been timely filed and the state board has authority to act**

The Council received a copy of the January 6<sup>th</sup> 2023 letter from the firm of Mitchell Chadwick in response to the petitions. The Council does not agree with the assertion that the petitions were not timely filed as they appear to conform to the requirements of Section § 13320(a) that states that within 30 days of any action or failure to act by a regional board under subdivision (c) of Section 13225, Article 4 (commencing with Section 13260) of Chapter 4, Chapter 5 (commencing with Section 13300), Chapter 5.5 (commencing with Section 13370), Chapter 5.9 (commencing with Section 13399.25), or Chapter 7 (commencing with Section 13500), an aggrieved person may petition the state board to review that action or failure to act. In case of a failure to act, the 30-day period shall commence upon the refusal of the regional board to act, or 60 days after request has been made to the regional board to act. The state board may, on its own motion, at any time, review the regional board’s action or failure to act.

It is The Council’s understanding that the initial grievance petitions were submitted electronically within the 30 day deadline following the February decision by the Los Angeles Regional Water Quality Control Board and additional information was subsequently requested of the petitioners. Furthermore, as noted, Section § 13320(a) provides the state board with the authority to review the regional board’s action or failure to act *at any time*.

The Council also notes that the January 6<sup>th</sup> 2023 letter refers to the project as a ‘68-unit Agua Dulce Residential Development Project’. The Agua Dulce Residential Project (TR-50385) as approved is a 315 unit project approved in 1994 and modified in 2007 of which only the first three phases totaling 68 units have thus far been recorded as previously noted. The fact that the developer’s legal representatives are referring to this as a 68-unit project adds further credence to the concern outlined in Section 2 of this letter that the developer has no intent to perform the necessary steps needed to plan and construct the onsite wastewater treatment plant, resulting in any septic systems becoming permanent.

## **9. Summary**

In light of the above, The Council’s view is that the decision that the Los Angeles Regional Board should have reached at the February 10th 2022 meeting was to have taken ‘No Action’ and required the developer to complete the necessary supplemental environmental report if they wish to revert to construction of the first three recorded phases of the Agua Dulce Residential Project with on-site septic systems.

Whether or not the developer has performed any of the grading work allowed under the dredge and fill permit that was approved in February 2022 is moot as it does not change the fundamental facts of the

matter that the developer's planned actions are to build the first three phases of the project with individual septic systems which is outside the scope of the approved 2007 wastewater entitlement for the project and contrary to the requirements of the Porter-Cologne Water Quality Control Act.

The Council has also raised concerns with the Los Angeles Regional Water Quality Control board regarding the financial instrument that was ultimately accepted as security for the permitted grading and we are also submitting this letter (attached) into the record as we never received any response from the LA RWQCB staff.

We ask that you carefully review our comments and include this response and the attachments in the documents that are considered as part of the record.

Respectfully,

*Don Henry*

Don Henry, President  
Agua Dulce Town Council – 2023

Attachments:

1. February 19, 1993: California Regional Water Quality Control Board-Los Angeles Region letter to Los Angeles County Regional Planning with Comments on Draft Environmental Impact Report, Valley Sage Development: 387 lots on 908 acres-Agua Dulce, Vesting Tentative Tract No. 50385, SCH. No. 91031100
2. March 10, 2022: Agua Dulce Town Council letter to Los Angeles Regional Water Quality Control Board with Comments on Approval of Discharge Requirements File 20-105
3. March 14, 2022: Agua Dulce Town Council letter to Los Angeles Regional Water Quality Control Board with Response to LA RWQCB Correspondence dated March 11, 2022: Water Quality Order No. R-4-2022-066 (February 10, 2022) File 20.105
4. October 24, 2022: Agua Dulce Town Council letter to Los Angeles Regional Water Quality Control Board with Concerns on Financial Assurance Instrument used for Order No. R4-2022-066 Section 13.J.
5. November 5, 2018: Form WW-172 Information sheet and application for a new metered water service connection in a Los Angeles county waterworks district

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