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August 13, 2025

Via Drop Box

Juliana F. Gmur
Executive Director
Commission on State Mandates
980 9th Street, Ste. 300, Sacramento, CA 95814

**Re: Request for Extension of Time to Respond to July 15, 2025
Comments from San Francisco Bay Regional Water Quality Control
Board and July 21, 2025 Comments from Department of Finance on
Order No. R2-2022-0018; Pending Test Claim No. 22-TC-07**

Dear Ms. Gmur:

Our office represents the Alameda Countywide Clean Water Program and its members, the City of Dublin, and claimant Union City, who have incurred costs related to the San Francisco Bay Regional Water Quality Control Board's municipal regional stormwater permit, Order No. R2-2022-0018. On July 18, 2025, a copy of the Regional Board's July 15, 2025 comments on Order No. R2-2022-0018 were served on parties. On July 21, 2025, the Department of Finance filed late comments on the Test Claim to concur with the Regional Board's comments. We would like to seek a 60-day extension of time to respond to the July 15, 2025 Regional Board comments as well as the July 21, 2025 comments from the Department of Finance, so that our new response deadline is October 21, 2025, instead of August 20, 2025.

Normally, written rebuttals to written comments concerning a test claim may be filed within 30 days of service of the written comments. (Cal. Code Regs., tit. 2, § 1183.3.) The Regional Board's comments consist of approximately 11,926 pages and due to the complexity of the comments, we reasonably require 60 days' time to respond.

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Juliana F. Gmur
August 13, 2025
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This request is supported by good cause because of the number and complexity of the issues, our inability to obtain essential testimony, documents, or other material evidence. Our request does not involve postponement of the January 23, 2026 hearing nor would it cause prejudice to the Regional Board which on numerous occasions sought similar extensions of time to file comments. (See Regional Board's Requests for Extension on July 8, 2024, September 6, 2024, November 6, 2025, January 3, 2025, March 10, 2025, May 6, 2025.)

We submit this document, under penalty of perjury, and hereby declare that the information in this correspondence is true and correct to the best of the personal knowledge, information, or belief of the undersigned. The undersigned's title, address, telephone number, and email address are reflected on page one.

Sincerely,

DUANE MORRIS LLP

A handwritten signature in blue ink, appearing to read "Viviana L. Heger", written over a horizontal line.

Viviana L. Heger
Special Counsel

VLH

cc: Jill Magee

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On August 15, 2025, I served the:

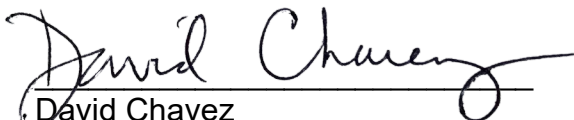
- **Current Mailing List dated August 14, 2025**
- **Notice of Extension Request Approval issued August 15, 2025**
- **Claimants' (City of Dublin, City of Union City) and Alameda Countywide Clean Water Program's Request for Extension of Time filed August 13, 2025**

*California Regional Water Quality Control Board, San Francisco Bay Region,
Order No. R2-2022-0018, 22-TC-07*

California Regional Water Quality Control Board, San Francisco Bay Region,
Order No. R2-2022-018, as modified by Order No. R2-2023-0019; NPDES
Permit No. CAS612008; Provisions C.3.b.ii(4), C.3.b.ii(5), C.3.j.ii(1)(a)-(g),
C.3.j.ii(4), C.3.j.ii(2)(a)-(j), C.5.f, C.8.d, C.8.e, C.8.f, C.10.a.i, C.10.a.ii, C.10.e,
C.11.c, C.12.a, C.12.c, C.15.b.iii, C.17.a, C.20.b, C.21.b, issued May 11, 2022,
effective July 1, 2022
Union City, Claimant

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on August 15, 2025 at Sacramento, California.


David Chavez
Commission on State Mandates
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 8/14/25

**Claim
Number:** 22-TC-07

Matter: California Regional Water Quality Control Board, San
Francisco Bay Region, Order No. R2-2022-0018

Claimant: Union City

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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