California Citrus Mutual

July 31, 2012

Ms. Pamela C. Creedon, Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

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RE: DRAFT WASTE DISCHARGE REQUIREMENTS GENERAL ORDER FOR MEMBERS OF A THIRD-PARTY GROUP WITHIN THE TULARE LAKE BASIN, EXCLUDING THE AREA OF THE WESTLANDS STORMWATER COALITION

Dear Ms. Creedon:

California Citrus Mutual (CCM) is requesting that the comment period on the above referenced Draft Order be extended.

CCM has been an active participant as a stakeholder, along with the Southern San Joaquin Valley Water Quality Coalition, in the development of the draft waste discharge requirements (WDRs) and a draft monitoring and reporting program (MRP) for discharges from irrigated lands within the Tulare Lake Basin, excluding the area of the Westlands Stormwater Coalition.

As posted, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff will consider written comments submitted by 5:00 P.M. on August 10, 2012. CCM has an appreciation for time and efforts put forth by staff in the development of the program. However, as a stakeholder in the process, we find the complexity of the program documents, the attachments, and numerous code cross-references extremely complicated and time consuming to evaluate. Additionally, analyzing the proposed monitoring and reporting requirements, in the context of the potential impact on our grower members, the citrus industry, its employees, and the communities supported by the citrus industry, will be very difficult for us to complete and then be able to draft comments in any meaningful manner by August 10. CCM therefore respectfully requests an extension to September 30, 2012.

In our judgment, this extension will allow a more informed comment submittal that would also take into consideration the issues addressed at the August 21, 2012 Board hearing in Tulare.

Thank you for your consideration of this request.

Sincerely,

Bob Blakely, Director of Industry Relations

cc: Senator Michael Rubio
Mr. Joe Karkoski, jkarkoski@waterboards.ca.gov
Mr. Clay Rodgers, crodgers@waterboards.ca.gov
Mr. David Sholes, dsholes@waterboards.ca.gov
George Soares, gsoares@kscsacramento.com

512 North Kaweah Avenue • Exeter, CA 93221 • 559-592-3790 • FAX 559-592-3798 • www.cacitrusmutual.com