TULARE LAKE BASIN WATER STORAGE DISTRICT

ESTABLISHED SEPTEMBER 1926

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August 1, 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

RE: Draft ILRP General Order for the Tulare Lake Basin

Dear Ms. Creedon:

The Tulare Lake Basin Water Storage District (TLBWSD) has been an active participant in the Southern San Joaquin Valley Water Quality Coalition's efforts as a stakeholder in the development of the draft Waste Discharge Requirements (WDRs) and 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 on the Central Valley Board (Board) web page, Board staff will consider written comments submitted prior to 5 pm on August 10, 2012. The proposed General Order includes regulation of groundwater for the first time that will impact growers not previously covered under the Conditional Waiver.

TLBWSD appreciates the effort of Board staff to prepare the proposed documents. However, we are concerned about the limited time to perform a meaningful review. Our reservations are based upon the complexity of the program documents, the magnitude of the geographic area, the monitoring and reporting requirements, and the anticipated resources to reach all existing and new Members and Commodity Groups potentially covered by the General Order. We, therefore, respectfully request an extension to September 30, 2012 for submittal of comments.

We believe a time extension will permit the regulated community a more meaningful opportunity to submit comments and include issues presented at the August 21, 2012 Board hearing in Tulare.

Thank you for your consideration. If you have any questions or would like to discuss this further please contact me.

Sincerely,

Mark Gilkey
General Manager

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

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