



**NCWA**  
Northern California Water Association



**TCCA**  
Tehama Colusa Canal Authority



July 18, 2018

**VIA EMAIL AND U.S. MAIL**

Felicia Marcus, Chair

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Dorene D'Adamo, Member

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State Water Resources Control Board

1001 I Street, 24th Floor

Sacramento, CA 95814

Re: Revisions to Proposed Bay-Delta Plan Amendments and Substitute Environmental Document – Lower San Joaquin River Flows and Southern Delta Salinity

Dear Chair Marcus, Vice-Chair Moore, and Board Members Doduc, D'Adamo, and Esquivel:

The San Luis & Delta-Mendota Water Authority, Tehama-Colusa Canal Authority, Friant Water Authority, Northern California Water Association, and San Joaquin River Exchange Contractors Water Authority (collectively, the "Water Authorities") have reviewed the Notice and proposed amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and the supporting proposed Final Substitute Environmental Document ("SED") for the Lower San Joaquin River and its tributaries that the State Water Resources Control Board ("State Water Board") released on July 6, 2018. The Notice sets a deadline for comments on the Proposed Final Amendments on July 27, 2018.


The Water Authorities join in the request by the San Joaquin Tributaries Authority for the State Water Board to (1) provide the public an additional thirty days to comment on the Proposed Final Amendments and SED, and (2) delay the public hearing an additional thirty days. The Proposed Final Amendments and SED include substantial changes that warrant careful consideration and comment. The State Water Board's responses to the various Water Authorities' March 2017 comments letters alone take up more than sixty-five pages, and reference "Master Responses," which themselves number in the hundreds of pages.

In this instance, a twenty-one day comment period is inadequate. To allow interested parties an adequate time to review the regulatory approach propounded in the Proposed Final Amendments and SED, we request the time extensions described above. Thank you for your consideration.

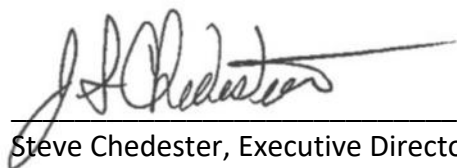
Regards,



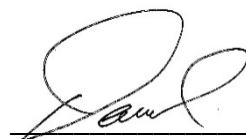
Frances C. Mizuno, Interim Executive Director  
San Luis & Delta-Mendota Water Authority



Jeffrey P. Sutton, General Manager  
Tehama-Colusa Canal Authority



Steve Chedester, Executive Director  
San Joaquin River Exchange Contractors Water  
Authority



David Guy, President  
Northern California Water Association



Jason Phillips, CEO  
Friant Water Authority

cc: Jeanine Townsend, Clerk to the Board, [LSJR-SD-Comments@waterboards.ca.gov](mailto:LSJR-SD-Comments@waterboards.ca.gov)  
Eileen Sobeck, Executive Director, [Eileen.Sobeck@waterboards.ca.gov](mailto:Eileen.Sobeck@waterboards.ca.gov)

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**From:** Rebecca R. Akroyd <rebecca.akroyd@sldmwa.org>  
**Sent:** Wednesday, July 18, 2018 1:37 PM  
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**Cc:** lsjr-sd-comments@waterboards.ca.gov; eileen.sobeck@waterboards.ca.gov; Frances Mizuno; David Guy; schedester@sjrecwa.net; Jeff Sutton; Jason R. Phillips  
**Subject:** Bay Delta Plan - Phase 1 Proposed Amendments and SED  
**Attachments:** 2018-07-18 Ltr to SWRCB re Bay Delta Plan Comments.docx.pdf

The attached letter is sent on behalf of the San Luis & Delta-Mendota Water Authority, Tehama-Colusa Canal Authority, Friant Water Authority, Northern California Water Association, and San Joaquin River Exchange Contractors Water Authority, on the above referenced subject.

Thank you for your consideration.



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