July 18, 2018

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

Felicia Marcus, Chair  
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Dorene D’Adamo, Member  
Dorene.Dadamo@waterboards.ca.gov  

Steven Moore, Vice-Chair  
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E. Joaquin Esquivel, Member  
Joaquin.Esquivel@waterboards.ca.gov  

Tam Doduc, Member  
Tam.Doduc@waterboards.ca.gov  

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:

Westlands Water District (“Westlands”) requests additional time to prepare written comments on the 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, which the State Water Resources Control Board (“State Water Board”) released on July 6, 2018.

The State Water Board set a deadline of July 27, 2018 for written comments and announces that oral comments would be allowed during the State Water Board meeting set for August 21 and 22, 2018. The Proposed Final Amendments and SED include substantial changes that warrant additional analysis and careful consideration. Given the substantial changes in the proposed final versions, the twenty-one day comment period allowed for review and preparation of comments is inadequate.

Westlands proposes that the State Water Board: (1) provide the public at least an additional thirty-one days to comment on the Proposed Final Amendments and SED, to at least Monday,
August 27, 2018; and (2) delay the public meeting for oral comments and consideration of adoption at least to the State Water Board’s meeting set for September 18 and 19, 2018.

Westlands recognizes the State Water Board’s desire to bring this process to a close. It began in 2009, and the proposed revised objectives and SED have been through multiple drafts and rounds of comment. But given all the work and time that has gone into this effort to date, by the State Water Board and commenters alike, it would be unfortunate to rush this last opportunity for comment before the State Water Board members consider them for adoption. A relatively modest investment of additional time will allow for better informed and considered comments.

Thank you for your consideration of this request.

Regards,

Thomas Birmingham, General Manager

cc: Jeanine Townsend, Clerk to the Board, LSJR-SD-Comments@waterboards.ca.gov
    Eileen Sobeck, Executive Director, Eileen.Sobeck@waterboards.ca.gov
Attached please find a letter from Thomas W. Birmingham, General Manager of Westlands Water District, on the above referenced subject.

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