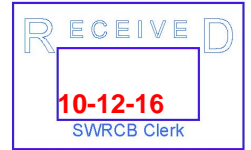




O'Laughlin & Paris LLP

Attorneys at Law

October 12, 2016



Ms. Felicia Marcus, Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95816

Ms. Dorene D'Adamo  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95816

Ms. Frances Spivy-Weber, Vice Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95816

Mr. Steven Moore  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95816

Ms. Tam Dudoc  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95816

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95816

Mr. Tom Howard, Executive Director  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95816

**Re: 2016 Bay-Delta Plan Amendment & SED – Comments**

Dear Board Members, Ms. Townsend, and Mr. Howard:

The San Joaquin Tributaries Authority (SJTA) received the State Water Resources Control Board's (State Water Board) revised notice of October 7, 2016. The SJTA and its individual member entities thank the State Water Board for increasing the comment period with regard to the WQCP/SED.

The SJTA requests the State Water Board accept comments until March 17, 2017. This request is made for the following reasons:

**NOT A RECIRCULATED DRAFT:**

The proposed changes to the Water Quality Control Plan are entirely new, as are the amendments to the SED. The 2012 proposal has grown substantially in length (3,500 pages) and complexity. Due to

vast differences in the proposed regulations and the manner in which these regulations are analyzed, the document is not really a re-circulated draft, but an entirely new proposal and document.

INCOMPLETE REFERENCE DISCLOSURE:

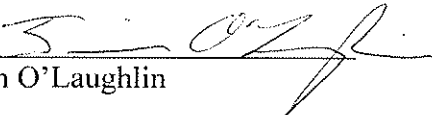
The Draft SED includes numerous referenced assumptions, data and modeling runs the sources for which are not disclosed in the document. In many instances this material forms what appears to be the basis for fundamental conclusions in the SED. The SJTA will be submitting a Public Records Act Request to obtain the undisclosed data, analysis, models and model runs. Without that specific information, neither the SJTA nor its member agencies are able to understand and interpret the SWB impacts analysis, let alone provide a comprehensive set of comments to the analysis.

FOCUSED IMPACTS:

The existing disclosures and information provided in the SED document make clear that the proposed changes will have a significant impact on the SJTA member agencies' operations, rates, reliability of service and customers. These impacts as stated are devastating to the local economy, agriculture, and groundwater aquifers in the region. Because the costs, both water supply and economic, are so dramatic, especially in dry years, the most directly affected community deserves an opportunity to fully understand and comment on the proposed regulation. We believe anything less fails to comply with CEQA and other applicable laws.

The SJTA and its members request an extension on the Comment Period until March 17, 2017. The SJTA may request additional time based on the SWB's response time to the Public Records Act Request and the amount of information provided in the response.

Very truly yours,

  
\_\_\_\_\_  
Tim O'Laughlin

TO/llw

Enclosures

cc: San Joaquin Tributaries Authority