

**Westlands Water District**

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July 18, 2018

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

Felicia Marcus, Chair  
 Felicia.Marcus@waterboards.ca.gov

Dorene D'Adamo, Member  
 Dorene.Dadamo@waterboards.ca.gov

Steven Moore, Vice-Chair  
 Steven.Moore@waterboards.ca.gov

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,

A handwritten signature in black ink, reading "Thomas W. Birmingham". The signature is written in a cursive style with a large, prominent initial 'T'.

Thomas Birmingham, General Manager

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:** Jon D. Rubin <jrubin@westlandswater.org>  
**Sent:** Wednesday, July 18, 2018 11:41 AM  
**To:** Felicia.Marcus@waterboards.ca.gov; Steven.Moore@waterboards.ca.gov; Tam.Doduc@waterboards.ca.gov; Dorene.Dadamo@waterboards.ca.gov; Joaquin.Esquivel@waterboards.ca.gov; WQCP1Comments  
**Cc:** chris.carr@waterboards.ca.gov; timothy.nelson@waterboards.ca.gov; 'Thomas Birmingham'; kclark@westlandswater.org; LSJR-SD-Comments@waterboards.ca.gov; Eileen.Sobeck@waterboards.ca.gov  
**Subject:** Bay Delta Plan - Phase 1 Proposed Update and Final SED  
**Attachments:** 2018-07-18 WWD to SWRCB re Bay Delta Plan Extension of Time to Comment.pdf

Attached please find a letter from Thomas W. Birmingham, General Manager of Westlands Water District, on the above referenced subject.

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