



September 21, 2016

**Sent via email to:**

Katheryn Landau ([katheryn.Landau@waterboards.ca.gov](mailto:katheryn.Landau@waterboards.ca.gov))  
Timothy Nelson I ([timothy.Nelson@waterboards.ca.gov](mailto:timothy.Nelson@waterboards.ca.gov))  
Jeanine Townsend ([jeanine.townsend@waterboards.ca.gov](mailto:jeanine.townsend@waterboards.ca.gov))  
Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

**Subject: Request for 76-day extension of comment period, Amendment to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and Supporting Draft Revised and Recirculated Substitute Environmental Document (Phase 1)**

Dear Ms. Landau, Mr. Nelson, and Ms. Townsend:

Our organizations write to request that the State Water Resources Control Board extend the comment period on the above referenced revision to the Bay-Delta Water Quality Control Plan and its Recirculated Draft Substitute Environmental Document. Currently,

Request for 76-day extension of comment period - Phase 1 Draft SED  
September 21, 2016

the Board's notice states that submission of written comments must be received by the Board no later than 12:00 noon on November 15, 2016.

We request an additional 76 days to review and comment on these documents. Their issuance comes at a time when many organizations like our own are also engaged in either monitoring or actively participating in hearings concerning the change petition on the proposed California WaterFix project. As important, the Board's revised amendment and recirculated Draft SED contains significant new information that our organizations will need additional time to review and consider before commenting. This new information includes the Board's new considerations of economics, drought factors, other flow and non-flow actions, management options, and several hundred pages of modeling methodology and results.

In 2012, the initial environmental review on the Phase 1 amendment to the Water Quality Control Plan provided for a comment period of December 31, 2012, through March 5, 2013, a total of 64 days for review. Upon request, the Board provided an extension of that comment period to March 29, 2013, for a total of 88 days for review. The documents released at that time contained just 2,100 pages. The Board has expanded the scope and size of these documents to nearly 3,600 pages, a 71 percent increase over the size of the 2012 documents. This year, the Board provides just 61 days for reviewing a larger set of documents. Further, release of these documents coincides with our groups' participation as protestant parties in the California WaterFix change petition proceeding before the State Water Board. An additional 76 days in which to comment would be proportionate to the size of the documents now at hand and fair to all parties. We ask that the comment period for the above referenced documents close on January 30, 2016.

Thank you for considering this request for additional time to comment. We recognize the importance of the Board's work to revise the Bay-Delta Plan, and we seek to provide it with thorough and useful comments for the Board's next steps.

Sincerely,



Barbara Barrigan-Parrilla  
Executive Director  
Restore the Delta



Tim Strohane  
Policy Analyst  
Restore the Delta

 <p>Bill Jennings Executive Director California Sportfishing Protection Alliance</p>	 <p>Tim Sloane Executive Director Pacific Coast Federation of Fishermen's Associations/Institute for Fisheries Resources</p>
 <p>Barbara Vlamis Executive Director AquAlliance</p>	 <p>Conner Everts Environmental Water Caucus Southern California Watershed Alliance</p>
 <p>E. Robert Wright Senior Counsel Friends of the River</p>	 <p>Carolee Krieger Executive Director California Water Impact Network</p>