

October 3, 2016

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

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Re: Request for Extension of Time to Comment - Cachuma Project Draft Order

Dear Ms. Townsend:

The Cachuma Conservation Release Board ("CCRB") hereby requests 45-day extension of time to comment on the Draft Order Amending Permits 11308 and 11310 ("Draft Order"). The Draft Order presents complex technical issues of hydrology and biology, and its resolution of those issues rests upon a massive administrative record spanning sixteen years of testimony and evidentiary submissions.

Evaluating the Draft Order's conclusions with respect to those issues by 12 Noon on October 25, 2016 as required by the Cover Letter for the Draft Order would be an extremely daunting challenge. The complexity of these issues and the size of the supporting administrative record mean that granting a 45-day extension of time will not prejudice the public, other parties to the Cachuma Project Hearing, or the State Water Resources Control Board. Accordingly, CCRB requests an additional 45 days to provide its comments on the Draft Order.

Thank you for considering this request. This message is electronically served upon the parties indicated in the updated service list of September 7, 2016.

Very truly yours,

DOWNEY BRAND LLP



Kevin M. O'Brien