



## DOWNEY BRAND

April 4, 2019

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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

Dear Ms. Townsend:

Thank you for releasing the Cachuma Project Revised Draft Order and for soliciting written comments on the proposed changes in advance of the Board meeting to consider adoption. In light of the importance and complexity of the changes proposed in the Revised Draft Order, the Cachuma Conservation Release Board (“CCRB”), the Santa Ynez River Water Conservation District (“Parent District”), the City of Lompoc, and the Santa Ynez River Water Conservation District, Improvement District No. 1 (“ID No. 1”), collectively known as the “Local Interests,” hereby request a 45-day extension of time to comment on the Revised Draft Order Amending Permits 11308 and 11310 (“Revised Draft Order”).

In addition to presenting complex technical issues of hydrology and biology, and over a decade’s worth of evidentiary proceedings and submission, the Revised Draft Order contains “substantial changes” from the version the Local Interests evaluated more than two years ago. *See* Cover Letter Transmitting Revised Draft Order, at 1 (March 27, 2019). In particular, the Revised Draft Order contains, among other substantial revisions: (1) a new analysis of its water supply impacts on the Cachuma Member Units based largely on the City of Santa Barbara’s desalination project; (2) extensive new conditions regarding fish passage around Bradbury Dam; (3) substantial new information regarding the 2012 Final Southern California Steelhead Recovery Plan; (4) newly proposed delegation of authority to State Water Resources Control Board staff; and (5) newly proposed requirements that could substantially affect future negotiations over a new Master Contract with the U.S. Bureau of Reclamation (“Reclamation”) for Cachuma Project water supplies—an effort in which the Cachuma Member Units are actively participating.

Closing the comment period for the Revised Draft Order on April 29, 2019 would not provide the Local Interests sufficient time to address the complexity of these issues, given the size of the administrative record, and the substantial changes that have been made to the Draft Order that

was previously circulated by the State Board. 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, the Local Interests respectfully request an additional 45 days to evaluate and comment on the Revised Draft Order.

Thank you for considering this request. This message is electronically served upon the parties indicated in the updated service list of March 26, 2019.

Very truly yours,



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