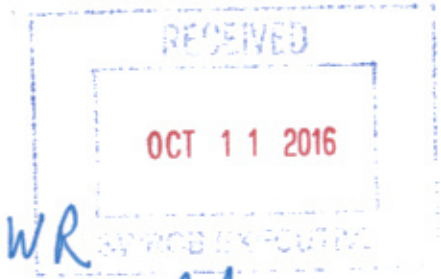
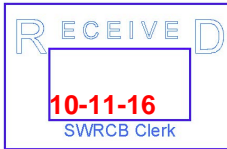




October 6, 2016



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814-0100

Re: Water Quality Control Plan (WQCP)

Dear Ms. Townsend,

The Turlock Irrigation District (TID) has completed a preliminary review of the SWRCB's draft WQCP/SED that was released on September 15, 2016. Based upon this preliminary review and in light of the breadth and scope of the 3,500+ page document, TID requests the SWB to revise the Notice to establish a new deadline to provide written comments. We request that the comment period be extended for an additional 120 days or until March 15, 2017 at 4:00 p.m. TID, its customers and the surrounding communities are adversely impacted by the actions proposed in this draft document, and therefore, we must be allowed adequate time to assess and communicate constructive and relevant comments back to the SWRCB for its decision making.

This WQCP has been ten years in the making, beginning with the SWB's review of the Bay-Delta Plan in 2006. The SWB noticed the Phase 1 WQCP/SED in 2009 and the initial draft of this SED was first released in 2012. In response to comments, the SWB then spent nearly four years and \$70,000,000 to prepare this newly-revised version without meaningful public input. The revised SED was released for recirculation on September 15, 2016 and concludes that there will be significant adverse impacts to the regulated community, and yet TID is provided only 60 days to respond. Sixty days to provide comment is not sufficient to read the draft SED, much less to provide any meaningful analysis. The imposition of this deadline is patently unfair and violates the rights of the regulated community.

We understand that the SWB desires to expedite the comment period due, in part, to the expiration of two Board Members' terms in January of 2017. This, however, is not a reason to deny directly impacted parties or the public their rights to review the document, the information supporting the document and to fully and meaningfully participate in this legislative process. Again, the SWB and its staff took four years to revise and release the re-circulated draft. The party to bear the burden should be the SWB and not the directly impacted parties nor the general public.

Finally, the WQCP/SED appears to have several fundamental deficiencies that hamper any efficient understanding of the information and, therefore, will require additional review and analysis in order for TID to understand and to provide constructive comments. There are references to reports that are 50-200 pages with no page citation. The SED also uses a revised Salsim model and revised Water Supply Effect model with no description of the changes from what was analyzed in the 2012 SED as compared

Ms. Townsend, Clerk to the Board
State Water Resources Control Board
October 6, 2016
Page 2

to the 2016 revised SED. Finally, the SED often uses averages of important water supply and natural resource metrics that mask the impacts of the WQCP.

Sincerely,



Casey Hashimoto, P.E.
General Manager

c: SWRCB Members
Felicia Marcus, Chair ✓
Frances Spivy-Weber, Vice Chair
Tam M. Doduc
Steven Moore
Dorene D'Adamo