

United States Department of the Interior



BUREAU OF RECLAMATION
Mid-Pacific Region
2800 Cottage Way, Room E-1604
Sacramento, CA 95825-1898



U.S. FISH AND WILDLIFE SERVICE
Pacific Southwest Region
2800 Cottage Way, Room W-2606
Sacramento, CA 95825-1846

DEC 07 2016

Ms. Felicia Marcus, Chair
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Extension Request for Proposed Amendments to the 2006 Water Quality Control Plan
for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary

Dear Ms. Marcus:

The Bureau of Reclamation and the U.S. Fish and Wildlife Service (Service) have preliminarily reviewed the recirculated Draft Substitute Environmental Document (SED) and the draft Scientific Basis Report issued by the State Water Resources Control Board (SWRCB) on September 15, 2016, and October 19, 2016, respectively, as part of a four-phase process of developing and implementing updates to the *Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary* (Bay-Delta Plan). The SWRCB has indicated it will accept written comments on the recirculated Draft SED (Phase 1) until the deadline of "no later than 12:00 noon on January 17, 2017." The SWRCB has also set a deadline for written comments on the draft Scientific Basis Report (Phase 2) until "no later than 12:00 noon on December 16, 2016."

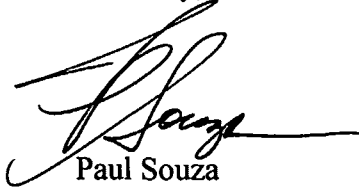
The Bay-Delta Plan was last updated in 2006 and identifies beneficial uses of water in the Bay-Delta estuary, water quality objectives to protect those uses, and a program of implementation to achieve the water quality objectives. In Phase I, the SWRCB is proposing to update the Bay-Delta Plan's San Joaquin River flow and southern Delta salinity water quality objectives and the program of implementation for those objectives. Phase II identifies and proposes the science that the SWRCB will be relying on when determining the potential changes to the Bay-Delta Plan with regards to increasing flows within the Sacramento River basin and the Bay-Delta to protect beneficial uses.

Given the length of time since the 2006 Bay-Delta Plan's last update, the ramifications of proposed changes, the complexity of the documents and appendices, and the restriction of having only a single opportunity to comment prior to changes being implemented, Reclamation and the Service respectfully request that both the comment periods on these documents be extended. We request that the comment period on the recirculated Draft SED be extended for approximately 120 days to May 15, 2017, and the comment period on the draft Scientific Basis Report to be extended for approximately 60 days to February 15, 2017. These extensions would allow the Department of the Interior to sufficiently evaluate the scientific justification and feasibility of the SWRCB's proposed updates to the 2006 Bay-Delta Plan.

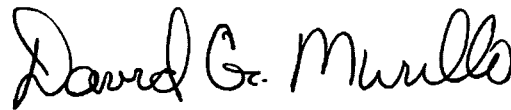
Granting the requested extensions will afford the Department of the Interior the opportunity to coordinate our comments with others to the extent possible, as well as provide the most thoughtful and meaningful information to the SWRCB. These extensions would be similar to those issued by the SWRCB for the California WaterFix, which has equally complex actions.

If you should have questions on this matter, please contact Ms. Carolyn Bragg, Reclamation's point of contact for this review, at 916-414-2433 or cbragg@usbr.gov, or Ms. Kaylee Allen, the Service's point of contact for this review, at 916-930-5632 or Kaylee_allen@fws.gov.

Sincerely,



Paul Souza
Regional Director
Pacific Southwest Region
U.S. Fish and Wildlife Service



David G. Murillo
Regional Director
Mid-Pacific Region
Bureau of Reclamation