

DEPARTMENT OF WATER RESOURCES

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March 29, 2013

Ms. Heather Halsey, Executive Director
Commission on State Mandates
980 9th Street, Suite 300
Sacramento, California 95814

Received
March 29, 2013
Commission on
State Mandates

Re: Test Claim Nos. 10-TC-12 *Water Conservation Act of 2009* and 12-TC-01
Agricultural Water Measurement

Dear Ms. Halsey:

The Commission has in the past graciously granted several extensions on this test claim to the Department of Finance and the Department of Water Resources (department). The Commission recently scheduled April 8, 2013 as the deadline for submitting comments. The department now seeks a 60-day extension of that date.

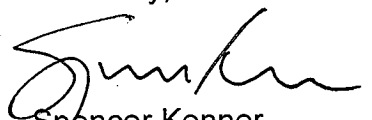
Two of the original four claimants, Richvale Irrigation District and Biggs-West Gridley Water District, recently filed an additional claim on February 28, 2013 based exclusively on the Agricultural Water Measurement Regulation. (CA Code of Regulations, Title 23, Div. 2, Chptr 5.1, Art. 2, Sections 597 et seq.) Although the issues are somewhat related to the original test claim, the new 181-page filing raises new issues and matters that will demand extensive agency resources on top of the existing issues contained in the original test claim. Given that, the department will be unable to properly review, analyze and submit timely comments on the recent submission given the short deadline and newly added scope, breadth, and complexities of the issues raised despite its best efforts.

As the Commission has consolidated the two test claims, the department will be jointly submitting its comments to both. Also, the department is aware that the Commission staff may begin work on this matter in May and that time is of the essence so the department will endeavor to submit its comments as soon as practicable.

The department would very much appreciate the Commission granting another 60-day extension. I look forward to your prompt response since the deadline is approaching.

If you have any questions or need additional information, please contact me at (916) 651-0874 or spencer.kenner@water.ca.gov. Thank you.

Sincerely,


Spencer Kenner
Assistant Chief Counsel