



PARAMOUNT FARMING



July 30, 2014

VIA E-MAIL

Jeanine Townsend (E-Mail: commentletters@waterboards.ca.gov)
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comment Letter - Tulare Lake Basin Plan Amendments

Dear Ms. Townsend:

These comments are submitted on behalf of Paramount Farming Company and Paramount Citrus and their related entities ("Paramount"). Paramount is a grower and processor of almonds, pistachios, pomegranates, and citrus with lands throughout the Central Valley and California. Paramount has a significant interest in participating in the regulatory processes of the State Board and Regional Boards which greatly impact and influence our operations and the economy of the state.

On March 27, 2014, the Central Valley Regional Water Quality Control Board ("Central Valley Board") in Resolution No. R5-2014-0038 adopted amendments to the Water Quality Control Plan for the Tulare Lake Basin to Edit and Update Language (2014 TLB Basin Plan Amendments). The 2014 TLB Basin Plan Amendments, which were presented by the Central Valley Board as updates and corrections to the basin plan, we believe substantially alter the ability of interested parties to meaningfully participate in future basin plan amendment processes. Although others and Paramount submitted comments to this effect (please see attached comment letter from Paramount dated February 14, 2014) no changes to this language were made prior to the Central Valley Board's adoption of the 2014 TLB Basin Plan Amendments.

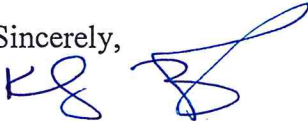
The significant impact of State Board and Regional Board actions, such as basin plan amendments cannot be understated. Economic and practical considerations of stakeholders should be fully understood and vetted prior to board actions. Water quality requirements, beneficial use designations and other actions impact all users in a basin.

Language included in the 2014 TLB Basin Plan Amendments appears to circumvent future public input processes by incorporating State Board policies "including future revisions" into the basin plan. Paramount feels this language reduces the importance of future basin plan amendments and denies stakeholders a meaningful public input process. As stated above, although these comments were shared in our February 14, 2014 comment letter, no changes to this language were made prior to the Central Valley Board's adoption of the 2014 TLB Basin Plan Amendments. We respectfully ask the State Board to remove language to "include future

amendments” or to remand the 2014 TLB Basin Plan Amendments to the Central Valley Board with direction.

Paramount appreciates the opportunity to submit comments and hereby joins in and incorporates those comments submitted by the Southern San Joaquin Valley Water Quality Coalition. If you have any questions, please do not hesitate to contact me at the contact information listed above.

Sincerely,

A handwritten signature in blue ink, appearing to be 'KB' followed by a stylized flourish.

Kimberly Brown
Director, Water Resources

cc: Mr. Darrin Polhemus, Darrin.Polhemus@waterboards.ca.gov
Ms. Dee Dee D'Adamo, Board Member, Dorene.Dadamo@waterboards.ca.gov
Mr. William D. Phillimore, wdp@paramountfarming.com
Pam Buford, pbuford@waterboards.ca.gov