Received
December 9, 2011
Commission on
State Manadates

BURHENN & GEST LLP
624 SOUTH GRAND AVENUE
SUITE 2200
LOS ANGELES, CALIFORNIA 90017-3321
(213) 688-7715
FACSIMILE (213) 688-7716

WRITER'S DIRECT NUMBER
(213) 629-8788

WRITER'S E-MAIL ADDRESS
dburhenn@burhenngest.com

December 8, 2011

Sent Via E-File

Mr. Drew Bohan
Executive Director
Commission on State Mandates
980 Ninth St., Suite 300
Sacramento, CA 95814

Re: *Santa Ana Region Water Permit – Riverside County,* 10-TC-07, California Regional Water Quality Control Board, Santa Ana region, Order No. R8-2010-0033, Effective January 29, 2010

Dear Mr. Bohan:

This office represents the Riverside County Flood Control & Water Conservation District, the County of Riverside, and the Cities of Beaumont, Corona, Hemet, Lake Elsinore, Moreno Valley, Perris and San Jacinto, Claimants in the above-noticed Test Claim. I am writing on behalf of the Claimants to respectfully request an additional extension of the time for submittal of Claimants' Rebuttal to the comments of the Santa Ana Water Board and the Department of Finance on the Test Claim. Claimants seek an extension to March 1, 2012 from the current due date, which is December 23, 2011.

Such extension is required due to the need to address the lengthy comments filed by these agencies, and particularly the Water Board, whose comments are 44 pages in length and includes 56 exhibits totaling hundreds of additional pages. The issues raised by the agencies' comments are complex and require not only detailed legal analysis but also factual inquiry of the Claimants and potentially factual responses. In addition, counsel for Claimants has been required to schedule a medical procedure for December 23. I have discussed this requested extension with counsel for the Water Board, David Rice, and he has no objection. Claimants thank Mr. Rice for his consideration.

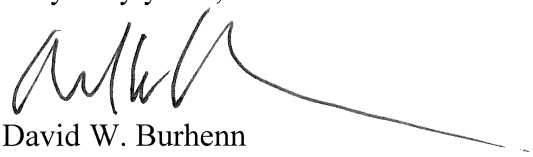
Pursuant to 2 Cal. Code Reg. § 1183.01(c), an extension may be granted by the Executive Director for "good cause" shown. Such good cause includes, *inter alia,* the number and complexity of the issues. 2 Cal. Code Reg. § 1181.1(h). Claimants also note

Received
December 9, 2011
Commission on
State Manadates

that the agencies requested, and were granted, multiple extensions to file their comments. Claimants had no objection to such extensions.

Claimants therefore respectfully request that you grant the requested extension to March 1, 2012. Thank you in advance for your consideration of this request.

Very truly yours,



David W. Burhenn

cc: Mailing List via E-File