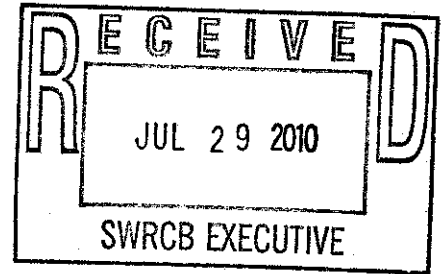




July 29, 2010



By Electronic Mail: commentletters@waterboards.ca.gov
and U.S. Mail

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

**Re: COMMENT LETTER – DRAFT DELTA FLOW CRITERIA
REPORT**

Ms. Townsend:

The San Luis & Delta-Mendota Water Authority supports the comments submitted by the State and Federal Contractors Water Agency and Westlands Water District on the Draft Report on the Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem ("Draft Flow Report"). The Draft Flow Report presents flow criteria that are not consistent with the State Water Board's obligations under the public trust doctrine and that are not supported by the best available science. Unfortunately, the Draft Flow Report was not developed with the scientific rigor that management decisions within the Delta ecosystem demand. It also fails to advance the scientific understanding of the Delta. Those limitations represent serious deficiencies for State Board staff missed an important opportunity to help inform the planning decisions that have to be made for the Delta Plan and Bay Delta Conservation Plan.

The Draft Flow Report does demonstrate the failures of the flow-centric approach that has over the past two decades devastated the ecosystem and water supply of the Authority's member agencies. The Draft Flow Report demonstrates that such an antiquated approach to management of the Delta is not feasible and will not meet the co-equal goals for management of the Delta. The criteria outlined in the Draft Flow Report would sacrifice water supply necessary to sustain environmental protections, as well as the water supply

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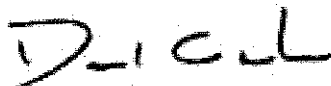
upon which the economy of California was built for no identified environmental benefit. As the State Water Board states:

"The water supply costs of the flows identified in this report illustrate to the State Water Board the need for an integrated approach to management of the Delta", and

"[P]ublic trust resource protection cannot be achieved solely through flows – habitat restoration also is needed."

Those are important lessons learned.

Sincerely

A handwritten signature in black ink, appearing to read "Daniel Nelson". The signature is written in a cursive, slightly stylized font.

Daniel Nelson
Executive Director