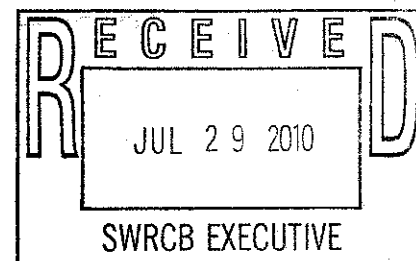


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July 29, 2010

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



Subject: Comment letter – Draft Delta Flow Criteria Report
FSI 064136

Dear Ms. Townsend:

Flow Science, on behalf of the City of Antioch, appreciates the opportunity to provide comments on the July 20 Draft Delta Flow Criteria Report (Draft Report).

The City of Antioch is supportive of the process the SWRCB has followed in developing the Draft Report, including the convening of experts for a range of subject areas. We are encouraged that the SWRCB has considered and evaluated detailed scientific information regarding the importance of flows to the protection of key species and the overall health of the Delta. Indeed, the recommended flow criteria are in many respects consistent with our testimony and written submittals suggesting that the SWRCB should use historic flow and salinity data to establish a baseline of water quality and flows for the Delta, and that future flows should not be reduced, nor salinity increased, beyond current levels.

We recognize that significant uncertainty exists in some of the scientific information upon which the draft flow criteria were based, and that the SWRCB has not yet “balanced” the recommended criteria with the public interest needs for water. As we have in the past, we offer to work with SWRCB staff to refine flow criteria in light of new scientific information and the constraints of the current system, system operations, and other beneficial uses.

Sincerely,

A handwritten signature in cursive script that reads "Susan C. Paulsen".

Susan C. Paulsen, Ph.D., P.E.
Vice President and Senior Scientist

cc: Phil Harrington