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JOHN V. "JACK" DIEPENBROCK  
KAREN L. DIEPENBROCK  
KEITH W. McBRIDE  
BRADLEY J. ELKIN  
EILEEN M. DIEPENBROCK  
MARK D. HARRISON  
GENE K. CHEEVER  
LAWRENCE B. GARCIA  
ANDREA A. MATARAZZO  
JOEL PATRICK ERB  
JON D. RUBIN  
JEFFREY K. DORSO  
JENNIFER L. DAUER  
SEAN K. HUNGERFORD  
CHRIS A. McCANDLESS  
DAVID A. DIEPENBROCK

JEFFREY L. ANDERSON  
LEONOR Y. DICICAN  
JULIE V. REISER  
DAVID P. TENBLADOR  
DAN M. SILVERBOARD  
LAMONT T. KING, JR.  
JONATHAN R. MARZ  
VALERIE C. KINCAID  
RACHEL A. COLES  
COURTNEY K. FRIEH  
ANTHONY J. CORTEZ  
BRADLEY B. JOHNSON

MICHAEL A. MANLEY, Of Counsel

R. JAMES DIEPENBROCK  
(1929 - 2002)

May 15, 2009

**Via e-mail: [bay-delta@waterboards.ca.gov](mailto:bay-delta@waterboards.ca.gov)**  
**and U.S. Mail**

Mr. Chris Carr  
State Water Resources Control Board  
Division of Water Rights  
P.O. Box 2000  
Sacramento, CA 95812-2000

**Re: *Comment Letter – Southern Delta Salinity/San Joaquin River Flows  
WQCP Workshop***

Dear Mr. Carr:

Diepenbrock Harrison submits this letter on behalf of the San Luis & Delta-Mendota Water Authority ("Authority") and its member agencies, in response to the "Second Revised Notice of Public Staff Workshop and Additional Opportunity to Comment on Proposed Modeling Alternatives ("Second Revised Notice"). This comment letter is intended to provide input and suggestion on the modeling approach utilized by the State Water Resources Control Board ("State Water Board") in its consideration of potential amendments to the Water Quality Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary related to southern Delta salinity and San Joaquin River flow objectives.

Simply put, the flow-based modeling approach identified in the Second Revised Notice is too narrow. To develop the range of information needed to make reasoned and informed decisions, the State Water Board should employ additional analytical tools. Specifically, the State Water Board should utilize modeling approaches that consider the effects of changes to all factors that could impact water quality, as well as approaches that compare the costs and benefits of providing different levels of protection to fish, agriculture, and water supply.

400 CAPITOL MALL  
SUITE 1800  
SACRAMENTO, CA 95814

WWW.DIEPENBROCK.COM

916 492.5000  
FAX: 916 446.4535

Chris Carr  
State Water Resources Control Board  
Division of Water Rights  
May 15, 2009  
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The Authority looks forward to continuing to work with the State Water Board and other stakeholders in this effort.

Very truly yours,

DIEPENBROCK HARRISON  
A Professional Corporation



*BRAD JOHNSON  
FOR*

Jon D. Rubin  
Attorneys for the San Luis & Delta-Mendota  
Water Authority

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