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April 21, 2014

VIA ELECTRONIC MAIL ONLY

State Water Resources Control Board
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Department of Water Resources
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Regional Solicitor's Office
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U.S. Bureau of Reclamation
c/o Paul Fujitani
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Re: Comments And Objections Regarding The April 9, 2014 And April 11, 2014 Orders Modifying An Order That Approved A Temporary Urgency Change In License And Permit Terms And Conditions Requiring Compliance With Delta Water Quality Objectives In Response To Drought Conditions (In the Matter of Specified License & Permits of the Dept. of Water Resources and U.S. Bureau of Reclamation for the State Water Project and Central Valley Project)

Dear State Water Resources Control Board Members and Agency Staff:

This letter is submitted on behalf of the San Luis & Delta-Mendota Water Authority ("Authority"). The Authority appreciates this opportunity to submit comments and objections in response to the April 9, 2014 and April 11, 2014 Orders Modifying an Order that Approved a Temporary Urgency Change in License and Permit Terms and Conditions Requiring Compliance with Delta Water Quality Objectives in Response to Drought Conditions (hereafter, "April Orders").

The Authority has submitted comments and objectives in response to previous related orders (dated January 31, February 7, February 28, and March 18, collectively "prior orders") regarding this matter and hereby incorporates those prior submittals by reference. In addition,

the Authority has submitted a Petition for Reconsideration of the orders as modified through March 18, 2014.

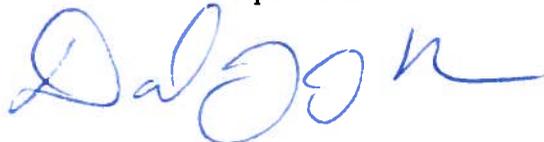
The April Orders make several necessary and appropriate changes to the prior orders, and respond in part to the Authority's prior comments and objections. In particular the Authority commends the State Water Resources Control Board ("Water Board") for extending relief from D-1641's Delta outflow requirements into April and for rebalancing the San Joaquin River flow requirements to help conserve critical stored water supplies and maximize beneficial use of this water as the drought persists.

Respectfully, there is more to be done to address people suffering from water shortages. The Authority continues to believe that the Order should be modified to further enhance opportunities to improve water supply south-of-the-Delta in 2014. To best serve the public interest in 2014, the Central Valley Project ("CVP") should be allowed to take maximum advantage of every reasonable opportunity to capture water available in the Delta for export pumping. The Authority therefore continues to request that the Water Board take additional steps to rebalance requirements to allow for additional export of water south-of-the-Delta. In addition, we renew our request that the Water Board issue Water Diversion Curtailment Notices to prevent illegal diversions under water rights that are unsupported by the current hydrological conditions. A more detailed explanation of these requests is provided in the Water Authority's March 28, 2014 comments.

In sum, the Authority appreciates the actions of the Water Board, DWR, and Reclamation to mitigate the drought's impacts and conserve scarce water supplies. The Authority is encouraged by the changes made in the April Orders and urges the Water Board to make even further changes to maximize the capture, delivery, and use of scarce water supplies, as described above. The current extreme hydrological conditions present challenges for the entire State and the Water Board has the critical task of balancing what is reasonable and in the public interest when so little water is available to support beneficial uses. We respectfully ask that when striking that balance, the Water Board give equal weight to the needs of the farms, families, and communities that depend upon CVP water supply.

Regards,

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation



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