

May 3, 2010

Jennifer D. Lammers
Chief Compliance Officer
Clearwater Investment Trust
2000 Wells Fargo Place, 30 East 7th Street
Saint Paul, Minnesota
55101-4930

Re: Clearwater Investment Trust (the "Registrant")
File Number: 811-05038

Dear Ms. Lammers

We have reviewed the Notification of Late Filing on Form 12b-25 (the "Form") filed March 2, 2010 on behalf of the Registrant related to the Form N-SAR for the fiscal period ended December 31, 2009.

Based on our review, we have the following comments:

- We have evaluated your response to Part III of the Form and have found your reasons for the extension of time, or lack thereof, to be insufficient.

Based upon the reason stated above, we do not consider the Registrant's Form N-SAR to have been filed timely. We expect you to discuss this matter, including our letter, with the Registrant's Board of Directors.

Please respond to each of the points raised in this letter and file your response as EDGAR correspondence. Before you file in response to this letter or file any new information with the Commission, please notify me at (202) 551-6963 so that we may better coordinate our review of your filing/information. Please direct any questions you have regarding this letter to me at the number indicated above or at diangeloc@sec.gov.

Sincerely,

Christina L. DiAngelo
Senior Staff Accountant

cc: Frank Donaty
Assistant Director
Division of Investment Management
U.S. Securities and Exchange Commission

Louis P. Becka
Assistant Director
Office of Compliance Inspections and Examinations
U.S. Securities and Exchange Commission

Richard F. Sennett
Chief Accountant
Division of Investment Management
U.S. Securities and Exchange Commission