



MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

March 12, 2008

Ms. Cynthia Pierson
California Department of Water Resources
SWP Delivery Reliability Report- Attn: Cynthia Pierson
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Ms. Pierson:

State Water Project Delivery Reliability Report 2007—December 2007 Draft

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Department's December 2007 draft of the State Water Project Delivery Reliability Report. The report updates estimates of the current (2007) and future (2027) State Water Project delivery reliability and incorporates (i) the December 2007 Federal Court ruling for Delta exports and (ii) potential impacts of future climate change. The utility of the draft Reliability Report could be enhanced if it is amended to include a second future conditions analysis that omits the projected effects of climate change.

The draft Reliability Report presumes that the restrictions on exports from the Delta put in place by the Federal Court for water year 2008 to protect the delta smelt are similar to the operational requirements that will result from the adoption of new federal biological opinions. While the Court ruling is only applicable until September 2008, when the new biological opinion is due to be issued, Metropolitan believes this to be a prudent assumption at this time. The forthcoming incidental take permit will incorporate operational requirements that may or may not be more stringent than the Wanger interim operations rules. Regardless, the present decrease in supply reliability underscores the need to provide improvements to the conveyance of Project water across the Delta.

The incorporation of projected effects due to climate change introduces a level of uncertainty in the assessment of the reliability of the State Water Project through 2027. While the draft Reliability Report states that, "Potential changes in climate patterns are becoming better defined..." (second paragraph, page 7), it also states that the potential effects of climate change in the future are "evolving" and that, "Incorporating climate change into future projections is difficult because of the many ways the patterns of rain, snow and temperature could shift" (second full paragraph, page 10). The analysis made use of the results of a 2006 report from the Department in which "broad-brush estimates are made of the potential impact upon the SWP around the year 2050...". The analysis converted the year 2050 conclusions contained in the

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2006 report to year 2027 through interpolation. Given the high degree of uncertainty, it is unclear how the results should be used.

Recently, Metropolitan has joined with other major water agencies within the United States to form the Water Utility Climate Alliance (WUCA). Top among WUCA's list of research needs is to reduce the uncertainty in projections related to how climate may change by improving and refining global climate models and applying them at the regional or local level. To facilitate incorporation of continued research and refinements of the projected effects of climate change, Metropolitan requests that the final version of the Reliability Report include a second analysis of future conditions without the climate change assumptions. This would provide a baseline analysis for future conditions to which refined projections of the effects of climate change could be applied.

Very truly yours,



Stephen N. Arakawa
Manager, Water Resource Management

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