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Comments to The State Water Project Delivery Reliability Report 2002
October 28, 2002

To: Thomas Hannigan
Director, California Department of Water Resources

Cc: Steve Macaulay
Deputy Director, California Department of Water Resources

Katherine Kelly
Chief, Bay-Delta Office

The California Water Network, a public advocacy group dedicated to the promotion of the equitable and environmentally sensitive uses of California's water, submits these comments to the Department of Water Resources 2002 Draft of The State Water Project Delivery Reliability Report. Our organization believes that accurate and realistic calculations and assumptions for water availability are vital to the economic health and quality of life of California's citizens.

Simulation Model

Models are only as good as their input. By not calculating historical deliveries in this Draft Report, the model will produce a less than accurate scientific analysis for future water deliveries.

Methods of calibration should be explained in the document, and should be reviewed and commented upon by experts outside of DWR. Peer review is essential for publishing an acceptable scientific document. We note in the comments from Robert Wilkinson on this Report his concerns that the model used may be totally inappropriate and unsatisfactory for this work. We believe DWR should carefully consider his remarks.

Reliability

Reliability in the Report is based on generalities that lead to less than accurate conclusions. Reliability is based on frequency calculations that are not conservative enough because they do not take into account actual historical deliveries and worst case scenarios. The Report should state exactly what basic water rights the SWP can rely upon and differentiate those from appropriated, surplus water that may not be available if all legal rights are claimed.

Misstating reliability also occurs because the Report does not address the issue of the ability of local purveyors to take and store water. The Report assumes that all contractors for State Water can receive and store water when it is available; this is not a logical assumption. The definition of "reliability" in the document as the ability to deliver a certain amount of water at a certain time to a certain place cannot provide a true representation of reliability because of the issues stated above.

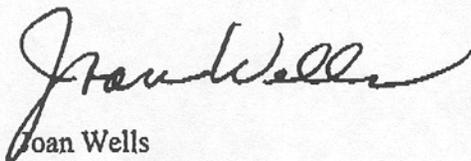
Summary

In order to properly plan for orderly development in California, the Report should conservatively estimate how much water will be available in the future using the best available technology and expertise in its calculations and hypotheses. Wishing data to be true will not deliver more water. The Department of Water Resources has a responsibility to the people of California to present the most accurate interpretation possible.

CWN has reviewed the comments by Robert Wilkinson and Dennis O'Connor and agrees with them and incorporates them by reference in this letter.

We request the Department of Water Resources review and extensively revise this Report. We further request that these comments, along with other comments submitted, and the responses to comments by DWR become a part of the SWP Delivery Reliability Report as an appendix.

Respectfully Submitted,



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