KERN COUNTY
WATER AGENCY

OCT 31 2002

WtrRes/Planning
Assoc/SWC Plan

October 28, 2002

Ms. Katherine Kelly
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Ms. Kelly,

This letter provides comments on DWR's draft SWP Delivery Reliability Report, dated August 2002. Overall, the report is well written, explaining complex water supply and delivery issues in simple language. The Department should be congratulated for producing this report, which will no doubt be invaluable to water districts in the SWP service area in their implementation of responsibilities under SB 221 (Kuehl) and SB 610 (Costa). The Agency would like DWR to consider the following points in development of the final report.

- Some individuals and organizations have requested the Department evaluate the potential impacts of climate change in this reliability report. The Agency feels this first report should focus on the reliability of the SWP without climate change. The merits of including climate change in subsequent report updates can be debated later. We understand that the California Water Plan (Bulletin 160-03) will undertake some evaluation of the potential impacts of climate change on the state's water system. That information may be useful for subsequent updates of the reliability report. The report should state that the potential impacts of climate change are not factored in, but that the future time frame being analyzed (2021) is still short-term enough that climate change is not expected to have significant influence. (1)

- When comparing the 2001 run with the 2021A and 2021B runs, the 2021 runs show the system can deliver more water (expressed as a percentage of entitlement) than under 2001 conditions in over 40 years out of 74 years of hydrology. Intuitively, it seems that the system should be able to provide less water in 2021 than in 2001, because the demands on the system and the upstream depletions are both higher. It may be that the modeling results are correct. If so, the report should explain why this is so. (2)

- A stated reason for the apparent reduction in average water delivery reliability over previous studies is the belief by DWR technical staff that a "new method" for calculating Delta outflow requirements is better than the "old method." While this represents a more conservative study, the one-line explanation of why DWR chose this new method is insufficient and needs expansion. (3)

- The simulation period was 1922-1994, which concludes at the end of the 1987-1994 drought. The subsequent wet period of 1995-2000 is very important for evaluating the rebound of groundwater projects from the 1987-1992 dry cycle. The Agency would like to see the simulation period extended to the year 2000. (4)

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- The 2001 simulation was done using the variable demand feature of the CALSIM model. The Agency would like to see a 2001 simulation added which uses the fixed demand feature of the model. The fixed demand level should be the current demands for entitlement (roughly 3.6 MAF). This will allow comparisons to be made of both 2001 and 2021 availabilities under both assumptions. The Agency understands that the variable demand feature attempts to reduce SWP demands in wet years, when local supplies depress demands on the SWP. This has implications for carryover storage and Article 21 availability. However, when expressed as a percentage as done in the draft report, it also has the tendency to understate actual SWP entitlement availability. In a wet year, the SWP has the capability of delivering 100% of entitlement, even if demands for entitlement are less. Comparing the 2021A and 2021B simulation results bears this out. The Agency has the ability to import and beneficially use large amounts of SWP water even in wet years, due to our extensive groundwater recharge facilities. Therefore, fixed demand simulations generally make more sense for the Agency's uses.

Thank you for the opportunity to provide comments on the draft reliability report. If you have any questions, feel free to contact Lloyd Fryer of my staff at (661) 634-1446.

Sincerely,

Thomas N. Clark
General Manager

cc: Member Unit Managers