

State Water Contractors

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October 31, 2002

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

Dear Ms. Kelly:

State Water Contractors' Comments on Draft State Water Project Delivery Reliability Report

The purpose of this letter is to provide comments from the State Water Contractors on the August 2002 Draft State Water Project Reliability Report. The State Water Contractors organization consists of 27 public agencies¹ that hold contracts or rights for water delivered by the State Water Project ("SWP"). Member agencies of the State Water Contractors supply SWP water for drinking, commercial, industrial and agricultural purposes to nearly 22 million people (approximately two-thirds of California's population) residing in Northern California, the San Francisco Bay Area, the Central Valley, the Central Coast and Southern California. SWC members also provide water to irrigate approximately 750,000 acres of farmland in the San Joaquin Valley.

Overall, the State Water Contractors would like to compliment DWR on their preparation of an easy to understand presentation of a highly technical topic. The report's information on SWP supply reliability will be extremely useful to individual water agencies in documenting their water supplies for purposes of local planning, as well as for meeting requirements of Senate Bills 221 and 610. The report also does an outstanding job of describing complex computer modeling studies in terms that can be understood and used by a broad spectrum of the public.

Although the CALSIM-II model has sometimes been criticized, the report accurately describes why direct comparison of model results (that are developed to a specific set of assumptions for

¹The public agencies that comprise the State Water Contractors are the following: Alameda County Flood Control and Water Conservation District, Zone 7, Alameda County Water District, Antelope Valley-East Kern Water Agency, Casitas Municipal Water District, Castaic Lake Water Agency, Central Coast Water Authority, City of Yuba City, Coachella Valley Water District, County of Kings, Crestline-Lake Arrowhead Water Agency, Desert Water Agency, Dudley Ridge Water District, Empire-West Side Irrigation District, Kern County Water Agency, Littlerock Creek Irrigation District, Metropolitan Water District of Southern California, Mojave Water Agency, Napa County Flood Control and Water Conservation District, Oak Flat Water District, Palmdale Water District, San Bernardino Valley Municipal Water District, San Gabriel Valley Municipal Water District, San Geronimo Pass Water Agency, San Luis Obispo County Flood Control and Water Conservation District, Santa Clara Valley Water District, Solano County Water Agency, and Tulare Lake Basin Water Storage District

Ms. Katharine Kelly

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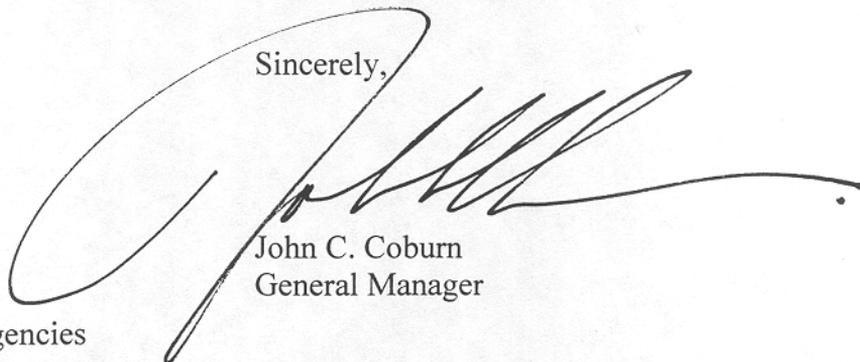
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historical hydrology, regulatory criteria and demands) to actual historical deliveries will normally not be possible. As described in the report, actual deliveries to SWP contractors will vary in part depending on the amount used by individual contractors. As these amounts have grown in recent years, the difference between CALSIM-II reported reliability and actual deliveries will be reduced, when assumptions for regulatory requirements, hydrology and other factors are similar. The data contained in the reliability report does indicate that actual deliveries have increased in recent years and were at 3.2 million acre-feet in 2000. The process being proposed in the Reliability Report and the California Water Plan update for evaluating the CALSIM-II model appear to be a reasonable response to concerns about CALSIM-II usage, and should serve as a useful means for considering the kinds of ongoing improvements that all models need.

The primary comment of the State Water Contractors on the Reliability Report is related to the tables summarizing reliability, which are currently presented as percent of Table A deliveries for SWP contractors. Especially for the 2001 condition, this presentation has the effect of indicating reduced SWP supply availability for most contractors in many years that water supply and capacity would actually have been available. At the 2001 level of development, most contractors request full Table A entitlement in all years. The CALSIM-II studies used a variable demand that reflects reduced demands for SWP deliveries by some contractors, resulting in less than 100-percent deliveries being reported for all contractors. While the CALSIM-II studies themselves would contain information indicating that most contractors received 100-percent of their requested entitlement, the reporting of delivery probability for the SWP as a whole (in Figure 1 as well as several tables in the report) would frequently indicate that they received less than their requests. This concern could be resolved by presenting report conclusions in terms of percent of SWP entitlement requested, in addition to percent of Table A, for the 2001 and 2021 simulations. An alternative would be to present the CALSIM-II assumed SWP demands used for the 2001 and 2021A simulations in a report appendix.

We appreciate the opportunity to review the SWP reliability report and would be happy to assist you in follow-up activities if needed. If you have any questions about our comments, please call Terry Erlewine at (916) 447-7357.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'John C. Coburn', is written over the typed name and title.

John C. Coburn
General Manager

Cc: SWC Member Agencies