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Sent: Thursday, October 14, 2021 5:40 PM

To: Delta Council ISB <DeltaCouncilISB@deltacouncil.ca.gov>

Cc: Nomellini, Grilli & McDaniel PLCs <ngmplcs@pacbell.net>

Subject: Review of Water Supply Reliability Estimation

Delta Independent Science Board

Re: Review of Water Supply Reliability Estimation
Related to the Sacramento San Joaquin Delta
Public Review Draft dated 1September 2021

Thank you for the opportunity to comment on the above.

And congratulations on being able to produce an important report during the period in which the ISB was working under such reduced financial resources. We are pleased that that problem has been addressed by the recent enactment of SB 821.

That being said we must also comment that the draft report falls considerably below what is now needed and what one might have anticipated. The current drought has demonstrated what close observers have long known: Current water supplies to the Delta fall well short of being able to supply the existing needs of the Delta itself under the historic operations of the Central Valley Project and the State Water Project even without consideration of climate change and increasing demands in the Projects' service areas. The continuous destruction of endangered species dependent on the Delta and its tributaries and the recurring pattern of reduction of water standards meant to protect the Delta during dry and critical years by "emergency" declaration are witness to this observation. We should not forget that the Central Valley Project never intended to supply all the needs of its customers and the State Water Project never constructed the facilities that would have increased its "firm" supplies by five million acre feet across the critically dry historic period.

The Report does an excellent job of surveying methodologies for estimating supplies and managing demands and forms the basis for future analysis. But what is needed urgently now is a stark recognition of the inadequacy of the existing supplies available for export once the lawful priorities for those supplies are met.

We are not writing on a blank slate here. Commitments have been made under water rights, watershed priority laws, environmental protection laws, and commitments to reduce reliance on the Delta which must be respected in assessing water supply availability for use elsewhere. We had hoped that the Review would illustrate this problem in addition to advice on how further study it.

It is certainly ironic that the State Water Project with the apparent concurrence of the Central Valley Project continues to press forward on the tunnel project in the face of a dire current shortage of water to put in it and in the face of further shortages likely to occur as the climate warms.

We had hoped that your Review would have highlighted this problem more forcefully.

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