



## Westlands Water District

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October 15, 2021

***VIA ELECTRONIC MAIL ONLY***

Delta Independent Science Board

E-Mail: [disb@deltacouncil.ca.gov](mailto:disb@deltacouncil.ca.gov)

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

Dear Members of the Delta Independent Science Board:

Westlands Water District (“Westlands”) appreciate this opportunity to provide written comments on the public review draft of the Delta Independent Science Board’s Review of Water Supply Reliability Estimation Related to the Sacramento-San Joaquin Delta, dated 1 September 2021 (“Draft Review”). Westlands encompasses some 600,000 acres in western Fresno and Kings counties. The lands within Westlands are some of the most highly productive agricultural lands in the world, producing, on average, more than \$1 billion worth of food and fiber annually, which generates approximately \$3.5 billion in farm-related economic activities in local communities.

The Draft Review focuses on a quantitative assessment of the modeling available to estimate water supply reliability. The Draft Review provides an in-depth analysis of the modeling available to assist in the water supply reliability estimate. The Draft Review also draws some very important conclusions such as the need to fully vet and understand the underlying assumptions included in the various models. These are important points.

However, the Draft Review should ensure the components of water supply reliability are differentiated. The Draft Report should be revised to discretely consider on a regional basis: 1) demand, 2) available sources of supply, and 3) tools that are available to allow maximize the ability of the available supply to meet the demand.

As to demand, the Draft Review fails to adequately address that key element of water supply reliability. The Draft Review identifies the definition of a reliable water supply, per the Delta Plan, Chapter 3, as “better matching the state’s demands for reasonable and beneficial uses of water to the available supply.” While the Draft Review provides an in-depth analysis of the modeling available to quantify the supply, it fails to discuss the demand side of the reliability

equation. As part of the legislative mandate, and in order to adequately analyze the “probability of achieving the water system performance objectives,” it is imperative to understand the dynamics of water demand in California. The Legislature provided clear direction California Water Code section 85302. There, it states that “[t]he Delta Plan shall include measures to promote a more reliable water supply”, in part, by “meeting the needs for reasonable and beneficial uses of water.” As the Draft Review acknowledges, it is not always possible to manage the available supply to meet the existing demands. Therefore, understanding those demands and their variabilities will help identify water supply solutions that improve reliability such as managing the system as a watershed, creating new supply, or improving water infrastructure throughout the State.

Additionally, the Draft Review does not adequately capture the water supply reliability considerations for agricultural entities in the Central Valley. The Draft Review, on page 43, identifies diversification as a solution for water supply shortages. However, diversification is often limited by location, economic considerations, and regulatory constraints. Many agricultural agencies simply cannot access alternative supplies and most have not been able to obtain approvals necessary to diversify because of funding challenges and the significant challenges presented by permitting processes.

Further, on page 12, the Draft Review draws the conclusion:

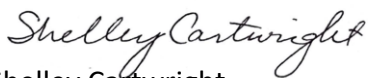
[S]hortages of water to local water users can often be addressed by re-managing local and regional water supplies and demands, including infrastructure re-operation, water market transfers or agreements, and reductions in water use by additional conservation and land fallowing.

This is an important conclusion. However, to improve the information presented and its utility to the water community, the listed management actions should be grouped based on whether they address demand or supply. In addition, additional actions should be listed, particularly associated with addressing shortages in supply, such as adding conveyance facilities, adding surface storage, adding groundwater storage, and shifting the regulatory approach for protecting the aquatic environment from one predominately based on use of water to a holistic approach that address a broader set of conditions. The improvements are important because the type of management action taken to address shortage has significant policy implications. For example, farmers can fallow land when sufficient water does not exist, however, when that number becomes large or when the need to fallow becomes prolonged, that option fails to be a viable, long-term solution.

In sum, given the size of California and the varying landscape, approaches to improve water supply reliability in one area of the State will not necessarily apply elsewhere. Estimating water supply reliability requires regional assessments of 1) demand, or as the California Legislature state “the needs for reasonable and beneficial uses of water”, 2) available options for supply, and 3) tools that are available to allow maximize the ability of the available supply to meet the demand.

Again, Westlands thanks you for the opportunity to provide comments on the Draft Review and we urge the ISB to consider the dynamics of water demand in California as part of a comprehensive estimation of water supply reliability.

Sincerely,

A handwritten signature in black ink that reads "Shelley Cartwright". The signature is written in a cursive style with a loop at the end of the last name.

Shelley Cartwright

Deputy General Manager- External Affairs

Westlands Water District

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