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**To:** Delta Council ISB <[DeltaCouncilISB@deltacouncil.ca.gov](mailto:DeltaCouncilISB@deltacouncil.ca.gov)>

**Subject: comments on draft prospectus decision-making under deep uncertainty**

Thank you for the opportunity to submit comments on this important topic. I would like to ask about issues affecting mathematical modeling. In general, discussions about projections under uncertainty start with a proviso about the limitations of modeling, perhaps quipping that "all models are wrong, but some models are useful." And then modeling limitations are forgotten and the results are discussed as if they were facts.

Modeling, especially in a complex system like the bay-delta, always involves numerous assumptions and choices on the part of the modeler. When the modeling party has an interest in the outcome of the modeling, bias in assumptions and choices is an ever present danger. Also, the models themselves have numerous assumptions built in that might tend to skew results one way or the other. Models that use machine learning and/or AI are particularly subject to bias and opaque methodology.

So my question is, how can a rigorous peer review ferret out and/or quantify modeling bias? Can the ISB develop a rigorous, systematic approach to assessing bias in mathematical models and inputs used to model bay-delta outcomes?

Thank you,

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