

## San Luis & Delta-Mendota Water Authority



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Mr. Joe Grindstaff  
Executive Officer, Delta Stewardship Council  
980 Ninth Street, Suite 1500  
Sacramento, CA 95814

### **Subject: Fifth Staff Draft Delta Plan**

Dear Mr. Grindstaff:

The Delta Stewardship Council has a rare opportunity to counter the misinformation and folklore that surrounds Delta discussions with a landmark planning document that accurately describes the estuary and existing water project operations. However, the fifth staff draft of the Delta Plan contains numerous inaccurate statements about the operations of the State Water Project (SWP) and the Central Valley Project (CVP) that add up to a false portrayal of these two water systems. Though representatives of our agencies are working to prepare detailed comments to the fifth draft Delta Plan, we feel compelled to briefly address a few of the more egregious examples.

Three examples:

1. *"More water is exported by the SWP and CVP in average or dry years than in wet years."* (Page 75). This is precisely the reverse from existing patterns. Over the past two decades, public water agencies have spent hundreds of millions of dollars developing a network of reservoirs and groundwater banks to capture surplus waters in wet years. As a result, the last five-year cycle of drought (lower deliveries) and recovery (higher deliveries) accurately reflect existing diversion patterns. The draft Delta Plan inaccurately portrays present-day operations by reviewing one previous dry year (2001) and one unusual wet year (1998), when flood and near-flood conditions compromised the ability of some agencies to import supplies. Basing generalizations on single years have led to wrong conclusions. **Figure 1**, below, is the Department of Water Resources (DWR) "reliability curve" that further illustrates the increased availability of water as precipitation increases.
2. *"2011 is the first wet year in which exports have exceeded 6 million acre-feet (Page 75).* This is not true. Exports in 2006--a wet year--exceeded 6 million acre-feet.

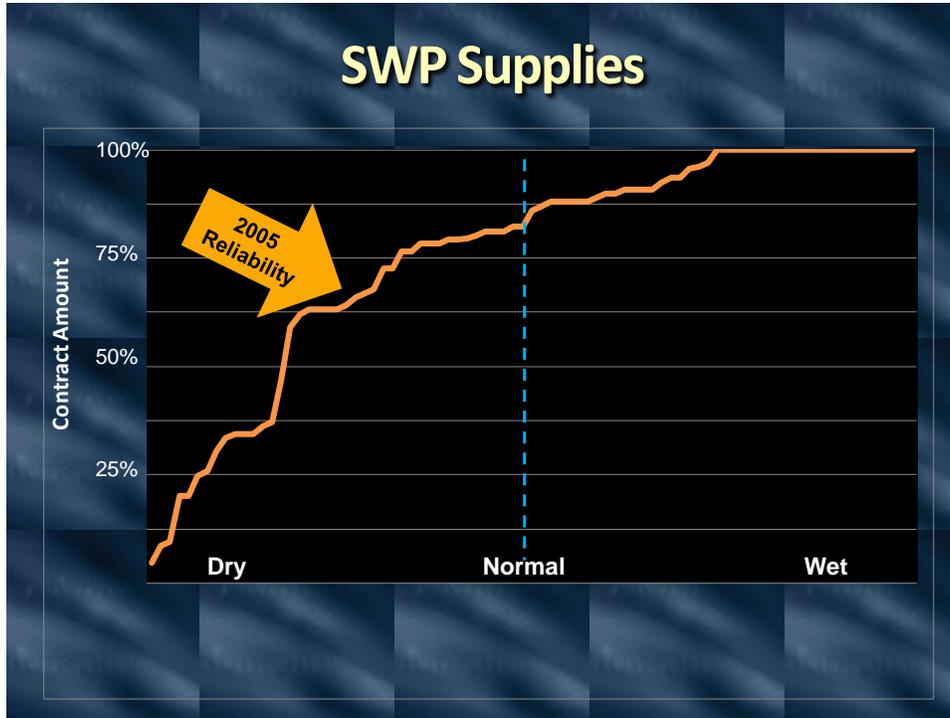


Figure 1. DWR "reliability curve"

3. "The expectation that each year--wet, dry or average--should yield the same quantity of water exported from the Delta watershed is unrealistic..." (Page 5) There is no such expectation. Rather, agreements anticipate varying supply availability. For example, in 2003 SWP contractors signed a Water Supply Contract amendment with DWR. It states: "The annual Table A Amounts and the terms of this contract reflect an expectation that under certain conditions (emphasis added), the District will receive its full Table A Amount; But that under other conditions, only a lesser amount, allocated in accordance with this contract, may be made available to the District." CVP customers also have water supply shortage provisions in their contracts that allow for changes in the amount of water made available for a variety of reasons.

Unfortunately, similar versions of these inaccuracies are repeated in the document. The result is an overall portrayal of Delta water project operations that is false. Wrong conclusions appear to be leading to wrong solutions. Representatives of our agencies will provide a more detailed response to the fifth draft Delta Plan at a later date. In the meantime, we offer our assistance to provide any information that you or your staff would find helpful.

Very truly yours,

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