COMMENTS OF
WHEELER RIDGE-MARICOPA WATER STORAGE DISTRICT

CALFED PUBLIC MEETING
BAKERSFIELD, CALIFORNIA
April 18, 1996

INTRODUCTION. The Wheeler Ridge-Maricopa Water Storage District is a Member Unit of the Kern County Water Agency. We have a contract for some 250,000 acre feet of State Project entitlement. This makes us the largest contractor for State Project water except for the Metropolitan Water District of Southern California and, of course, the Kern County Water Agency itself. This also makes our District is the largest agricultural user of State Project water. We have been delivering this water for twenty five years. This includes the drought of 1977 and the drought of the early 90's. During several years we received a short supply. In 1991 we received absolutely no State Project water. We still, however, had the opportunity to pay full project costs.

Since maintaining an adequate water supply is critical from our viewpoint, since our water supply must now pass through the Sacramento-San Joaquin Delta, and since the Delta is a most inefficient water transfer facility causing much of the water released from Oroville Dam to be lost in the process of transfer, we are vitally interested in the CALFED activities and I must say somewhat disappointed in the results to date as set forth in the Information Package for the April 15 workshop held in Sacramento. This one inch thick document was received just one week ago so it is hoped that there will be a chance to make further comments if additional study indicates that to be appropriate.

MISSION STATEMENT. The CALFED mission statement is:

> "To develop a long term comprehensive plan that will restore ecological health and improve water management for the beneficial uses of the Bay-Delta system".

This is followed by "Objectives" which are listed as follows:

1. Ecosystem Quality.
2. Water Supply Reliability.
3. Water Quality.
4. System Vulnerability (Levees).

Since the Bay-Delta "provides two-thirds of the water for California's homes and businesses, besides irrigating the state's billion dollar agricultural industry" (CALFED news release), and since Bulletin 160 projects shortages of several million acre feet,

Presented By: Arnold S. Rummelsburg
District Consultant

we would assume both the mission statement and the objectives to be interpreted to include an improvement in water supply for areas south of the Delta. As we review the ten alternatives, and specifically the "Core Actions" and "essential Elements", however, both of which are considered in the information package as the first two stages in each of the ten alternatives set forth, we feel that solving water supply problems is taking a back seat to other purposes. There is, however, substantial emphasis on "demand management", or how to use less water.

ECOSYSTEM RESTORATION. Throughout the report are items dealing with Delta Ecosystem Restoration, However, we are unable to find a definition as to just what this means. Surely the intent cannot be to restore the Delta and its wildlife to those conditions which prevailed 150 years ago before significant impacts occurred from mining, levee construction, Delta farming, urbanization, commercial and sport fishing, introduction of non-native species, both intentional and unintentional and water diversions for export. There should be developed some reasonable standard or goal. Perhaps instead of ecosystem restoration we should be talking about ecosystem management. Goals and objectives should be set in recognition of and consistent with the multitude of competing Delta activities, past and present, and their respective impacts on the Delta environment.

CORE ACTIONS. The first stage of each of the ten alternatives are the "core actions" and these are listed as follows:

1. Bay-Delta Habitat Restoration.
2. Upstream Habitat Restoration.
3. Reductions in the Effects of Diversions.
4. Management of Anadromous Fish.
5. Reduction in Export Reliance.
6. Increasing Water Supply Predictability.
7. Management of Water Quality.
8. Improvements to System Reliability.

Within these "core actions" there are proposed 46 separate activities. 26 of these activities deal directly with habitat and fish management, 4 with water quality, 5 with levees, and 11 deal with ways to use less water (which we will discuss later). We find nothing in the "core actions", the first stage of each of the alternatives, to improve our water supply or to increase its dependability.

ESSENTIAL ELEMENTS. "Essential elements" are listed as the second stage of each of the ten alternatives being considered. These include the following:

A. Physical and Structural Features.
   1. Habitat Restoration.
   2. Fish Protection and Transport.
   3. Flood Protection and Levee Stabilization.

B-002402

B. Operation and Management Features.
   1. Water Supply Management.
   2. Water Diversion Management.
   3. Fisheries Management.
   4. Water Quality Management.
   5. Management of System Vulnerability.

C. Institutional and Policy Features.
   1. Habitat Programs.
   2. Water Supply Management.

Of the 27 separate activities listed under the "essential elements", 12 deal predominantly with habitat and fish management, 5 with water quality, 3 with levees and 7 generally with demand management. As in the case of the "core actions", we see nothing in this second stage of all of the alternatives to improve our water supply picture.

It was our understanding that the various activities associated with the four objectives would be developed somewhat in parallel so that none of the objectives developed farther ahead than the others. As we look at the ten alternatives, and the proposed staging, we find that not to be the case. For those alternatives which do provide a water supply benefit, that benefit does not come into the picture until Stage 3 at best, later stages in some, and some provide no water supply benefits that we can see whatsoever.

DEMAND MANAGEMENT. One of the major items proposed for the first two stages of all of the alternatives, and for additional stages of some, is Demand Management. The notion that demand management can be considered as a part of a solution, at least with respect to the agricultural sector, is simply unrealistic.

As previously noted, the Wheeler Ridge-Maricopa Water Storage District has been

delivering State Project water for twenty five years - through drought and shortage, including one year with a zero project water supply. In addition our water costs have continually risen (without a comparable rise in comodity prices).

Of necessity we have developed our own "demand management" programs. Our farmers have an average efficiency of over 80%. In the drought year of 1991 about 40,000 acres of the previously farmed 102,000 acres was left fallow, and only about half of that has now come back into production. The marginal land has already been retired. We are involved in ground water programs (and are now a 24% participant in the Kern Water Bank). In 1991 we tried to be a participant in the State Drought Water Bank but found the cost to be so high that our farmers couldn't afford it. We've squeezed the lemon about as much as it can be squeezed.

B-002403

Of particular interest is the fact that our District is not unique in the above activities. Those which are appropriate are an integral part of the programs of substantially all agricultural districts taking State Water Project water. We believe you will find this also to be true with respect to those districts served by the Federal CVP. In fact, efficient operation is demanded of those districts as a result of the CVPIA.

Following are comments on specific demand management items, all of which are a part of both the "core actions" and the "essential elements, stages one and two of all alternatives.

WATER CONSERVATION. Greater efficiencies in water use are included as a part of a Delta solution with emphasis on BMP's for the urban sector and EWMP's for the agricultural sector. We find it interesting, however, that there is no effort to encourage efficient use of water for environmental purposes. In an atmosphere of shortage, is it not appropriate that all uses be held to the same standards? A parallel program for efficient environmental use is essential - we suggest it be called SMEW, Superior Management of Environmental Water.

With respect to the agricultural sector, we believe that efficient irrigation practices are the rule in the San Joaquin Valley. If there is any further demand reduction as a result of additional improved irrigation practices, however, it will simply help overcome existing shortages and will not reduce the overall requirements for Delta diversions. In the Tulare Basin, farm water efficiencies are so high that the Department of Water Resources has estimated a total basin efficiency of about 95%, far greater than desirable for salt balance purposes.

LAND RETIREMENT. We find the concept of taking additional land out of production as a means for reducing water demands completely unacceptable. Reduction in irrigated acreage has already taken place. In the San Joaquin Valley portion of Kern County, irrigated acreage is down from about 975,000 acres in 1984 to approximately 800,000 acres ten years later. In our District alone about 23,000 acres of previously irrigated land went out of production during this same period. Further reductions, either permanent or temporary, simply cannot be tolerated. As in the case of water conservation, if any further reductions in irrigated land do occur, we do not believe they would reflect any reductions in the need for Delta diversions.

With respect to the impacts of this item, in our area it is estimated that one man-year of direct labor is required to farm 40 acres. Thus retiring 800,000 acres as proposed by one of the alternatives would eliminate 20,000 basic jobs (with a multiplying factor of from 3 to 5 for related activities). The environment of those folks who no longer have work will be significantly affected. and this should be reflected in the CALFED EIR/EIS process.

B-002404

CONJUNCTIVE USE AND GROUND WATER BANKING. These items are included in both the "core actions" and "essential elements" as steps in solving Delta problems. Conjunctive use has been practiced by local entities for many decades, and these activities will no doubt be expanded. This is necessary to cope with current shortages, let alone those which will occur in the future. The one effort of the State to undertake a major conjunctive use program did not meet with a great deal of success, and we expect any ground water activities to remain a local agency enterprise.

WATER TRANSFERS. Although we support voluntary water transfers, and in fact have participated in them, we would object to any mandate on this issue. Neither do we believe that water transfers are a reasonable tool to solve problems of the Delta. In this current era of Statewide shortage of developed water, transfers simply move the shortage from one place to another. Transfers are taking place, and will continue to do so, but not as a part of a Delta solution.

DROUGHT WATER BANK. Neither do we believe that the drought water bank is an appropriate part of a Delta solution. A drought water bank was developed in 1991 by the Department at the urging of the State Water Contractors and was subsequently expanded to include anybody needing water in the State, and we believe that such a program will of necessity be continued.

COMMENTS ON SPECIFIC ALTERNATIVES. The "core actions" and "essential elements", the first two stages of all alternatives have previously been discussed. The following brief comments deal with the further stages of the ten alternatives.

We cannot support any alternative that does not provide an improvement in water supply. Key to this is a positive improvement in the capability of the Delta as a transfer facility. Since an improved transfer facility is needed, the question is whether it will be through the Delta , an isolated facility, or a combination of the two. Therefor alternates C (Dual Delta Facility), D (Through Delta Conveyance) and J (East Side Conveyance) should be combined for future study purposes.

Alternative E (Delta Channel Habitat and Conveyance) appears incomplete and could be combined with the above three for future study purposes. Alternative A (Extensive Demand Management) is completely unacceptable. Neither alternative B (New Storage to Improve Delta Flow) nor alternative F (Extensive Habitat Restoration with Storage) appear to provide any meaningful improvement in water supply. Alternative G (Eastside Foothill Conveyance and I (West Side Conveyance and River Restoration) should be deleted on the basis of implementability because of both costs and environmental impacts. Alternative H (Chain of Lakes) would probably fall in the same category although it does present a novel idea.

B-002405

Any Delta programs must address fishery and environmental problems. Unfortunately the causes of these problems are not well established. Likewise the levee items must be addressed.

COST OF DELTA ALTERNATIVES. Before any meaningful decisions can be made on the "preferred alternative" information on costs, allocation of costs among beneficiaries and repayment must be developed. Since one of the CALFED principles is that a Bay-Delta solution be affordable, it is essential that this be accomplished as early as possible. Although concern has been expressed that bad decisions can be made of costs are focused on too early, equally bad decisions can be made if cost information is delayed too long. Thus it is essential that costs, allocation of costs among beneficiaries and repayment analyses be developed before a "preferred alternative is selected. To do otherwise could result in a program which is at best meaningless and at worst detrimental to a true solution. We appreciate the fact that a financial strategy is being developed which includes the concept of cost allocation. We are concerned that under your present schedule adequate cost information will not be available in sufficient time to make proper judgements.

PARALLEL IMPLEMENTATION OF MEASURES TO MEET STATED OBJECTIVES. The implementation of measures to meet stated objectives must proceed in a manner to assure that all stated objectives will be met. This will require that measures to improve water supply be implemented simultaneously with measures to improve ecosystem quality, water quality and reduce system vulnerability. This principle is absent from the stated solution principles and we believe it must be added to assure that all of the stated objectives are met.

We have learned through past experience that there can be no assurance strong enough to guarantee implementation of water supply measures after ecosystem measures are implemented. The most recent example of this is in the December 1994 Bay-Delta Accord which provided substantial additional water for ecosystem management. We were led to believe that this water was to be replaced as a part of the CALFED Bay-Delta process. Yet we see nothing in the stated objectives which address this issue.

We cannot support any program which does not assure increased water supply reliability at acceptable quantity levels, and affordable replacement water for those quantities taken through previous Delta decisions.

B-002406