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File No. 7.10.1

June 30, 1998

Mr. Lester A. Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Attention: Mr. Rick Breitenbach

FAX NO. (916) 654-9780

Re: Comments on Draft Programmatic PEIS/R

Dear Ladies and Gentlemen:

This letter is presented on behalf of Wheeler Ridge-Maricopa Water Storage District and its landowners.

The Wheeler Ridge-Maricopa Water Storage District is located at the extreme Southern end of the San Joaquin Valley encompassing an area of 229 square miles. Nearly all of the water consumed within the District is for the production of a wide variety of agricultural crops. The District contracts for water from the State Water Project and the 238,000 acre-feet of water under contract from that source is the major source of water supply for the District.

We incorporate by reference the comments of Kern County Water Agency, dated June 30, 1998. While we are very supportive of the CALFED process, we wish to emphasize, as delineated in the Agency's comments, that there are many inconsistencies, misconceptions, and what we perceive to be bias in the draft PEIS/R which are not consistent with the actual facts as we know them relative to water usage, alleged environmental problems, and potential solutions.

In particular, we wish to emphasize that there is unrealistic reliance on water conservation and recycling, particularly when compared to the most recent comprehensive review of such matters as set forth in DWR's Bulletin No. 160-98. Furthermore, seemingly absent from the potential mix of measures to protect the environment yet provide sufficient water supplies for the State's cities and farms, is a requirement for good stewardship and conservation of water when used for environmental purposes.

It has been suggested by some high ranking officials in the Federal Administration that global warming is a very real threat which must be seriously considered. While we have no direct knowledge as to the accuracy of these assertions, if they are correct the effects should be considered. In this regard, the CALFED Draft Programmatic PEIS/R fails to consider the progressive impact of global warming on the increasing demand for agricultural and urban water supplies due to the increased evaporation and evapotranspiration resulting therefrom. Global warming if it occurs would also reduce the effectiveness of the existing reservoir system of the State due to reduced snow melt and increased rainfall runoff, thus indicating a need for substantial increasing the reservoir storage capacity within the State.

Mr. Lester Snow
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These comments, and the incorporated comments of the Agency, are submitted, in addition to the verbal comments provided at the April 29, 1998 hearing in Bakersfield by the Engineer-Manager, William Taube, (see attached copy of comments), and the Staff Engineer, Robert Kunde, and our attorney, Ernest Conant.

We understand that CALFED intends to prepare a revised draft Programmatic PEIS/R which will identify a draft preferred alternative and which will be available for public review and comments later this year, before the preparation of a Final Programmatic PEIS/R. Based on our review of the draft now available, it would appear that only Alternative 3 would come close to meeting the water quality and quantify requirements of farms and cities within the State, while at the same time protecting and enhancing the environment. Accordingly, we recommend the next draft focus on flushing out Alternative 3, along with major revisions of the draft, consistent with the referenced Agency comments.

Thank you for your consideration of these views.

Very truly yours,



Wm. A. Taube
Engineer-Manager

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Enclosure