



Westlands Water District

3130 N. Fresno Street, P.O. Box 6056, Fresno, California 93703-6056, (209) 224-1523, FAX: (209) 241-6277

July 1, 1998

JUL 01 1998

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

Dear Mr. Snow:

Subject: Comments on the Draft Programmatic Environmental Impact Statement/Report (PEIS/R) for the CALFED Bay-Delta Program

Westlands Water District hereby joins in the comments of the San Luis & Delta-Mendota Water Authority (SLDMWA) and the Ag/Urban Water Caucus (Ag/Urban) regarding the draft PEIS/R and incorporates them by reference. Because we played a role in the development of those comments, we believe they reflect the most significant of Westlands concerns regarding the document. Of course, we will continue to remain actively engaged in the development of the program throughout the process because it is so important to our future water supplies. We will, therefore, attempt to save a tree or two and simply emphasize, and ask that you pay particular attention to, those comments that relate to analysis of Trinity River flows under the CVPIA (SLDMWA comments), analysis of water transfer potential, analysis of water supply opportunities (SLDMWA comments) and treatment of water use efficiency (SLDMWA comments).

Based on recent conversations with CALFED staff, an additional comment is warranted regarding the water supply objective of the CALFED Bay-Delta Program. Since the earliest workshops on development of the Program objectives and initial alternatives, we have maintained that the Water Supply Objective to "reduce the mismatch between Bay-Delta water supplies and the current and projected beneficial uses dependent on the Bay-Delta system" would be misinterpreted to allow reductions in export supplies to be considered consistent with the objective. In spite of language that expands on that statement on page 1-7 of the PEIS/R reflecting what we were verbally told when the comments were originally made regarding the need to improve export water supplies, it appears that our concerns have been validated. We were recently informed that EPA has indicated that because the Water Supply Objective is stated in that manner, any action that "reduces the

Y:\admin\dpeisr2.wpd

C - 0 1 5 9 1 9

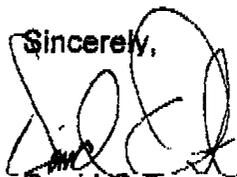
C-015919

Mr. Lester Snow
Page 2
July 1, 1998

mismatch" must be considered in the 404(b)(1) analysis for storage or conveyance, including reducing export supplies. If that is the case, the Objective must be revised to reflect its true intent.

Thank you for the opportunity to comment on this important document. Although it is sometimes difficult, we continue to be optimistic that the CALFED process will yield a solution that works for all users of the Bay-Delta system.

Sincerely,



David Orth
General Manager

cc: Dan Nelson

Y:\admin\dpeier2.wpd

C - 0 1 5 9 2 0

C-015920