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Subject: Monterey Agreement EIR

Having access to but the first volume of the document, I may be commenting on topics covered in volume two. Perhaps, that document consists of all acronyms, if the first volume trend continued that is a standard. If a term is used rarely, an acronym be not necessary or appropriate other than to make the user feel "in" while actually being a fool.

Much of the brouhaha concerning the document is of a policy matter rather than environmental and I will only discuss policy in so far as it has environmental impacts, saving my rants for the use of acronyms. Actually, the baseline of the original document shows how it has become dated do to changes in the environment and water supply and quality. I would suggest that the agreement is part project and part programmatic. As both baselines will change, as will their interactivity, it would appear beneficial to have more updating. Could there be a sunset, or rather a tie in with the state water plan (Bulletin 160)? The Water Bank< which will receive much of my emphasis, must surely be a vital part of the Integrated Regional Water Plan. Unfortunately there is a hold out agency to doing an Integrated plan-Integration even being a disliked term with our local schools. Also, DWR staff should not see this as an onerous increase in workload, but as a chance to truly initiate adaptive management.

There will be a decrease in anticipated water deliveries as snowpack decreases

There will be an increase in pumping and other energy costs

Population will have impacts

An example of a situation that did not exist when the Accords were reached is a health and safety issue. There was no West Nile Virus when the agreement was made which resulted in delays in control of the mosquitoes while it was argued who had the financial responsibility. for vector control. Arguably, there is possibly a nexus between the postponed spraying and the fact that the kern area has more West Nile cases that the rest of the State combined. I see updates as better for mitigation which is preferable to litigation.

There are already introductions of exotic species and many of them will continue to be noxious. Could not regional planning aid in control of those occurrences which impact health and safety as well as those impacting efficiency? A local ranch converted to water bank was the Tumbleweed Farms, a term not romantic but descriptive; Some even feel this is a native species. Russian Thistle? Also, there is aquatic weed such as arundo and hyacinth being grown in the county park on the river. By the time of the next Water Plan, they should be totally out of control. Good for County employment, especially kinfolk, but not so good for water transport, Tamarisk, gleefully a product of the DWR, I will later discuss.

Growth inducing impacts

As you may remember, I was on the advisory group to the Kern water bank when it was under DWR control. Speaking of acronyms, it was then that I found out what DWR stood for- delays while rewriting. I feel this delay syndrome may impact opposition to growth. At the time I was an advisor, the Sierra Cult, (this term is an evaluation , not a typo of which there are in abundance) wished to develop the ten section oil field. As the ten section is one of the last bastions of an endangered species, it can be assumed that the Sierra cult will continue in its program of species endangerment. Current operators have voiced opposition to development in this area which is a virtual inholding. Would the DWR be as vocal?

If the water bank is operated by the State, would it cave in to political pressure from LA? The Southland area is quite profligate in water use and conservation measures as severe tiered pricing, reuse, etc are not prone to general acceptance. Note even AB 320, regarding landscaping, was a committee drag out during a drought, but it was never enforced when water returned. Water taken from ag for urban use will allow for municipal abilities to serve with resultant sprawl. Option 5 is a preferred mitigation as it will force urban areas to bite the bullet eventually.

When the Accords were instigated, much of the area was in row crops. As water prices have increased there has been a conversion to specialty crops, While these crops may be not considered as a basic need, with World Trade Organization etc protesting subsidies they may be here to stay. However out of basin transfers need not be mandated; Would the DWR pay in lieu fees? Tax base loss often encourages counties to zone for dollars. The County of Kern, being one of the nations top bureaucracies when measuring bureaucrats to populace, will zone for development anyway.

Could the water bank be grazed for not only weed control, but also for Williamson act subventions? Would subventions apply if the area was cropped to aid infiltration and weed control?

Recreation

In the Document, there is discussion of Castaic Lake and Perris but Kern does not seem to exist. There was to be hunting on the water bank but this has not occurred for waterfowl. How much has to do with the incompetents of Fish & Game in Fresno, who state it can't be done, contrary to Fish and Game in Sacramento, who state it can easily be done. Fresno is not a location to attract competent outdoorsy types. These are the people who declared the DWR weed patch and reservoir at Huron a wildlife area.

It can be assumed that if the State operated the Water Bank, they would have the adjoining State Park involved with disastrous results. One only has to see the Grasslands State Park to verify this. Also the Parks operate many water related facilities, poorly and without cost effectiveness. Self guided tours are not Parks forte when the objective is to show a profit for use elsewhere. Could State parks keep the water bank up when they are notorious for inability to get their own toilets to flush. It is the misappropriation and waste of watershed funds with the Park system that will continue to be a major cause of a diminished water supply.

The lack of waterfowl hunting has been a complaint of the local duck clubs. Their claim is that the Water Bank being a sanctuary impacts hunting and their income. The clubs are adjuncts to local farming operations, and while I cannot speak for them, I am impressed with the success of hunting benefits to wildlife and air quality in the rice growing areas which is a win-win situation. Would it not be beneficial to give first rights to water to the wildlife friendly water users?

- this would be an incentive for participation in easement programs such as the proposed Tulare Basin Wildlife Management Area
- their could be some recharge in areas not on the Corcoran clay
- As State agencies, such as Caltrans, are already purchasing easements on land they transferred, wouldn't water preference be part of their mitigation?
- At the least, this proposal would determine if the protest over the Agreement is driven by environmental or transfer, of water or title, issues.
- Feral cats, ferrets etc which are destructive of wildlife, yet beloved of the CSUB environmental club, should be eliminated. Shallow moats may be required here as they are in Davis

Air Quality

The document discusses air quality as a product of construction. As a resident, let me assure the Department that the southern San Joaquin Valley's air rating is not solely from project construction.

The switch to permanent crops should lessen air pollution especially during the mandated plow down which occurs during Santa Ana wind time. Nut harvest is blamed for dust, but does this dust originate in row crops or fallow lands. Can palliatives be tested on these crops? Does the concept of fallowing contribute to deterioration of air quality and the carbon sequestration come to nil when the fallowed lands are again cropped or weeds eliminated?

There is a program to replace diesel operated pumps, but they do wear out and the air situation returns. The current local water community is to be commended for going solar. Were these lands to revert to the State, does the DWR have any plans to develop solar on Its lands before the incentives run out or the sun extinguishes?

There is a problem with agricultural waste burning being an inconvenience. More generation using watershed biomass as well as orchard and vineyard fuels would help the energy shortage. As I noted in my oral statements, on stream storage and hydro is a ways off- if possible.

Is there going to be a consideration of tying water availability to air quality mitigation? Is it even feasible?

Remember in the Kern area dust has a nostalgic attraction to our transplanted Mid-south heritage. Dust can also be a safety issue for the area has a number one listing for fatal pile ups which occurred during a dust storm at plow down.

Solid Waste. The current operators have contracted private security. Would the State have it? There is already some problem with the Water Bank being seen as the West Side Sanitary Landfill. Would other agencies do any better? With a shortage of underpaid wardens, could they do environmental/cultural resource patrolling and prevent poaching?

Downstream Impacts and social Justice

The raison d'être for water banking was to replenish the local water table as the pumping costs rise exponentially to water table drop. Out of basin transfers ignore this fact, and it becomes an EJ issue. Some transfers are to the north in actuality.

- How does one determine that the water being sent out is not from the local water bank or has migrated from it?
- Metro Bakersfield pays a subsidy through Benefit Zone #7; will loss of the benefits result in a rebate of the subsidy?
- If minorities are laid off from farm labor due to fallowing, who will make them whole?

Preferred mitigations

Supply

Watershed restoration

Brackish water desal at the Delta or at the turnouts

Eliminate saltcedar from DWR properties and its 4' of ETR

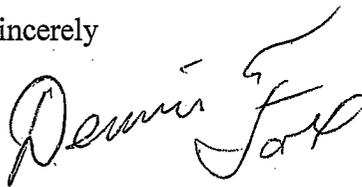
Other

No out of basin transfers

Participation in area wide mitigation

Participation in area wide planning and process.

Sincerely



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