## Tate & Associates

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February 21, 2000

Mr. Dirk Reed, Project Manager Metropolitan Water District P.O. Box 54153 Los Angeles, CA 90054 **B**5

Dear Mr. Reed.

I am writing on behalf of the Arizona & California Railroad regarding the Cadiz Groundwater Storage & Dry-Year Supply Program Environmental Impact Statement. We have read the EIS and would like to make known a number of concerns the line has regarding the impacts the proposed pipeline will have on the line's business and track. Those concerns specific to the line include:

B5-1

## 1. Increased maintenance cost to the line.

B5-2

On page 5-133 under the heading <u>Rail Transportation</u> the EIS reads as follows "To ensure that disruption of rail service due to liquefaction...does not occur, a Groundwater Monitoring and Management Program will be established". Further its is established elsewhere in the EIS that subsidence caused by liquefaction might be as great as almost 2' feet at some locations.

It is important that the monitoring system be tied into the railroad's operating center and that regular monitoring reports be provided to the railroad's engineering department. Even changes in track elevation as small a 3 inches can require expensive reballasting and retamping of track for a considerable distance on either side of the affected area. The project must provide some guaranteed method of reimbursing the railroad should track realigning be required due to project-related elevation changes.

-185-3

## 2. Pipeline crossing of railroad.

An easement agreement and approved plans to cross the railroad right-of-way with the project pipeline must be agreed upon. In addition to an engineering and construction plan approved by the railroad, the railroad will require certain safety measures during the survey and construction process including flagging and coordination with train schedules. If you have any questions of comments I may be reached at (425) 481-8756.

Stephen M. Tate
Stephen M. Tate

Principal Tate & Associates

On behalf of the ARZC

C.c. David Parkinson John Scott