



Elden Hughes  
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March 7, 2000

Metropolitan Water District  
Water Resource Management Group  
P.O. Box 54153  
Los Angeles, CA 90054  
Attn: Dirk Reed

G9

Bureau of Land Management  
California Desert District  
6221 Box Springs Blvd  
Riverside, CA 92507  
Attn: James Williams

RE: DEIS/DEIR Cadiz Groundwater Storage and Dry-Year Supply Program

These comments are made in behalf of the Sierra Club.

] G9-1

The Sierra Club supports the off-stream aquifer storage of water; however, this project as set forth in the DEIS/DEIR raises grave concerns and does not have our support. We are concerned that the draw down of the aquifer would have grave consequences for the natural resources of the nearby Bureau of Land Management (BLM) Wilderness Areas and the National Park Service Mojave National Preserve, and the Public Land resources of the project area. We further believe that the DEIS/DEIR is inadequate, and that it should be revised and recirculated for additional public review and comment.

] G9-2

We have reviewed the report of the United States Geological Survey and the Durbin/Foster report prepared for the County of San Bernardino. We are not hydrologists, but the above two reports raise enough questions that the recharged numbers used in the DEIS/DEIR are not to be trusted. Rather than total redundancy, we incorporate these reports by reference.

] G9-3



We believe the DEIS/DEIR is inadequate for the following reasons:

The DEIS/DEIR makes numerous references to a monitoring and mitigation plan in the documents, but fails to contain such;

G9-4

The DEIS/DEIR fails to consider an existing utility corridor (the railroad right-of-way) from the MWD Aqueduct to Cadiz, but rather considers two other alternatives. It thus fails to contain a reasonable range of alternatives. The BLM should not be considering a new corridor, nor is it required to grant such a right-of-way. The proposed corridor will impact the wilderness areas and the Class L lands that the BLM is charged with protecting.

G9-5

While the DEIS/DEIR mentions that the Trilobite Wilderness is only 3.5 miles away from the project, it fails to discuss the project's effects on the springs in that Wilderness or even that it has springs and the fact that historically that Wilderness has been the home of the second largest herd of bighorn sheep in the Mojave Desert.

G9-6

The USGS and San Bernardino County have reviewed the water recharge model and data and find it seriously flawed. It appears to greatly overestimate the recharge and much of the value of the project is based on such overestimated values. In light of these reviews, it is imperative that Cadiz and MWD redo the studies and reevaluate the project.

G9-7

Lowering the water table which the DEIS/DEIR acknowledges it will do, can have disastrous effects on the surrounding Wilderness Areas and potentially the Mojave National Preserve. In the case of the Cadiz Sand Dunes it could deprive the dunes of their under surface water. Virtually all small animals on the dunes are dependent on moist sand one-half inch below the surface. It is to this they dig to escape the heat. Lack of this moisture means they dig to death. In the case of Clipper Mountains Wilderness and Trilobite Wilderness the drying of the springs would decimate the bighorn herds and the wildlife dependent on the springs. It is unbelievable that the Mojave National Preserve is unmentioned in this context.

G9-8

Lowering the water table and thus depriving the "dry" lakes of Danby, Cadiz, and Bristol of their under surface moisture could make the lakes enormous sources of PM10 particles. This possibility does not seem to be acknowledged.

G9-9

The Sierra Club is concerned with impacts to the night sky by the projects lighting. Light pollution is pollution and is a concern of ours.

G9-10

The statement is made in the DEIS/DEIR that the potential effects of subsidence are insignificant because they are spread over a large area. Any subsidence is significant. To further assume that subsidence is uniform is an assumption which needs much further study. The subsidence once occurring in Long Beach Harbor was from a much deeper liquid withdrawal yet it was far from uniform.

G9-11

The BLM should consider the purity of the water in the aquifer as one of the resources it is charged with protecting. The impacts of releasing 1,015,532 tons of salt and 12.2 tons of perchlorate into the groundwater is a significant impact. If we ignore these impacts there is still the question of which aquifer. The environmentally preferred alternative would be to take out the water that is put in from the aquifer it was put in. This is not given as an alternative, all pumping is from a lower aquifer, all storage is in the upper aquifer

G9-12

G9-13

We are commenting on a project DEIS/DEIR that had its public meetings in Needles and 29 Palms. These communities may have proximity, but not the affected population. They become the affected population only if large dust storms result from the project. There should have been more public hearings in the affected communities. Maps, such as Figure 4-8 on page 4-19, are incomplete by showing only some of the Wilderness Areas within the mapped area, but not all. The Cadiz land holdings are displayed, but not the land tenure of the proposed rights-of-way. The DEIS/DEIR says the present agricultural water extraction has not significantly affected water levels, but never defines "significant" or the method by which non significance is determined. The DEIS/DEIR tells us less than we need to know to make intelligent comments.

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The no action alternative is the appropriate alternative based on the present DEIS/DEIR, otherwise a reanalysis and rewrite of the DEIR/DEIS or significant supplement is needed.

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Sincerely,



Elden Hughes  
Chair  
Sierra Club  
California/Nevada RCC  
Desert Committee