

February 25, 2000

Metropolitan Water District of Southern  
California, Post Office Box 54153, Los Angeles, CA  
90054-0153, Attn. Jack Safely.

P6

To whom it may concern,

I would like to submit these comments on the CADIZ VALLEY GROUNDWATER STORAGE EIS. Me and my wife own 400 acres of land in the area and demand the "No Action Alternative" for the following reasons. All we are left with are unanswered questions.

P6-1

The Metropolitan Water District of Southern California wants too much native or "fossil" groundwater lying under the Fenner, Cadiz, and Bristol Valleys in the Mojave Desert south of the Mojave National Preserve and north of Joshua Tree National Park.

Presented as an underground storage and retrieval plan, taking water in wet years from the Colorado River, percolating it underground, and retrieving it for use only in dry years, it sounds good at first. But the somewhat confusing details, as put forward in the EIR last November, show a different story.

P6-2

Of up to 1,000,000 acre-feet of stored water how much can be retrieved for use in subsequent dry years? We don't know, its not indicated in the EIR. Obviously significantly less than the amount put in as evaporation in the percolation ponds and underground flow to the Bristol and Cadiz Dry Lakes. The Met staff say they will get back to us with that data later.

P6-3

Where is the Colorado River water going to come from for the remaining 35 years of this project after 2015 when disbursement falls under the control of the Secretary of the Interior? There is no data on this issue at all in the EIR, just an assumption that water will be available when needed. Perhaps that is why all EIR-presented scenarios show a large groundwater deficit and a very little storage in the later half of the project.

P6-4

Why does the EIR show up to 2,000,000 acre-feet of native groundwater being extracted when this is far above the project-supplied estimate of any available sustainable groundwater level? Because they clearly do not intend to keep the extraction at a sustainable level. They expect a 22 inch subsidence in the valley floor and a 190 foot groundwater drop from the current levels.

P6-5

How did the project come up with their figure of 30,000 acre-feet per year as a sustainable annual groundwater removal amount when more recent estimates show a much less figure? This water is "fossil" water, that is, it was put there by rains and snows at the end of the ice age 10,000 years ago. If it is taken out it is gone forever, the land subsides, and the water table drops. Springs dry up, vegetation changes, and another non-renewable natural resource is squandered for short-term gain. Why is there no data on the effect of a 190 foot groundwater drop on springs in nearby BLM wilderness areas? The Met staff say they don't think it will affect the springs so no study was done.

P6-6

Why is there no comprehensive groundwater monitoring plan with agency oversight which includes both the agricultural usage and the project usage so a sustainable regime can be maintained? The Met staff says they are working on some sort of plan but its not finished yet so its not in the EIR and we can't evaluate it.

P6-7

Why is the BLM taking a backseat on this project? Why are they not insisting on complete, well thought-out plans for this project? What we have got here is sloppy work. It is inconsistent, incomplete and as it stands unworkable except as a blank check for a total grab of the native groundwater in Cadiz Valley.

P6-8

Why is the manager of Cadiz Land Company the "unofficial" water policy advisor to Governor Gray Davis, and does that have anything to do with a multi-million dollar public subsidy for this project to be voted on in the March election? Does that have anything to do with the "rush-to-approval" attitude that the BLM seems to have for this proposal?

P6-9

In the BLM's press release there is NOTHING mentioned about drawing out native groundwater in connection with this project. The summary page of the EIR says up to 2,000,000 acre-feet of native groundwater could be taken over and above the 1,000,000 acre-feet of "stored" water put in. Furthermore, since an unspecified percentage of the "stored" water will actually run off into two dry lakes, this project truly is more about groundwater removal than it is about storage and retrieval.

P6-10

The USGS (United States Geological Survey) has prepared a report criticizing the groundwater removal figures. It is now in draft form and will not be available to comment upon as things stand now. San Bernardino County planning staff has reviewed the EIR and has prepared a report critical of the groundwater removal figures. We are hoping that it will become available after it has been presented to their Board of Supervisors in late February.

P6-11

The EIR states that the purpose of the project is to meet dry year needs for the growing six-county Southland in 2020. There is time to look at ALL the facts. There is no need for a quick cover-up. We want a supplemental EIR which will provide a full disclosure of the groundwater pumping element and its impacts on the surrounding public lands.

P6-12

The project proponents, Metropolitan Water District (MWD) and Cadiz, Inc., propose to construct a 35-mile long, six-foot diameter underground pipeline to transport water from the Colorado River to Cadiz property in the Cadiz and Fenner Valleys. The water would be stored underground and withdrawn by MWD as needed to meet current and future water needs of Southern California. This will impact wilderness values and sensitive wildlie species like the desert tortoise and Mojave fringe-toed lizard.

P6-13

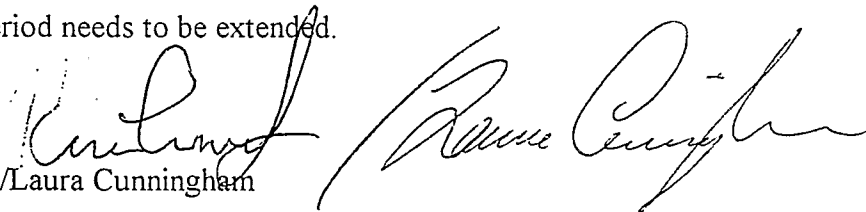
If approved, the BLM would issue a right-of-way permit for construction of the pipeline and necessary pumping facilities on BLM-managed public lands. The proposed project also would require a plan amendment to the California Desert Conservation Area Plan to allow the pipeline to be constructed outside an existing utility corridor.

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The comment period needs to be extended.

Thank you,

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