

Alan Siraco
Amanda K. Roze

March 3, 2000

Jack Safely
Metropolitan Water District of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153

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Re: Cadiz Water Storage and Dry Year Supply Program

Dear Mr. Safely:

This letter is submitted in response to the District's invitation to the public to comment on the Draft EIS/EIR for the above-captioned proposed project. We are active desert hikers and have several concerns about the environmental impacts of the proposed project. While we feel that water storage and retrieval is a sound policy in theory, the preferred alternative in the DEIS/DEIR is grounded in a lack of information that makes any reasonable determination of the potential impacts impossible. **Therefore we request that the District call for additional information and promulgate an amended or supplemental DEIS/DEIR to fully disclose the environmental impacts of the project.**

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We question the purpose and need for the specific project proposed. The DEIS/DEIR projects a 170,000 acre-feet dry year deficit by the year 2020. While the 150,000 acre-feet maximum draw per year will meet a large percentage of this need, the need is based upon a growth projection that should not be assumed. If growth requires drastic measures to meet a water need, then the growth should be regulated rather than increasing resource extraction. By analogy: a projected growth in the demand for jewelry would not, in itself, justify a gold mining operation that disturbed pristine lands. The need for the project must be analyzed in context. Growth must be addressed in order to justify the need for the project.

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We are also opposed to the construction of the water pipeline outside the existing utility corridor. The described project does not provide sufficient justification for the encroachment on undisturbed lands. The existing right of way possessed by the railroad is preferable to disturbing pristine lands in Cadiz and Sheephole valleys. In addition, the project calls for the construction of a road and 4-story power line through what is currently a 100,000 acre roadless

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area. This is not justifiable given the existing right of way available for the construction of such infrastructure.

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The project calls for the extraction of underground water that exceeds the volume of water being diverted from the Colorado River, and it expects a substantial land subsidence as a result. Groundwater, such as that available in the aquifer must be recognized as an extremely valuable "resource" for future generations. The drawdown of the groundwater in the Cadiz aquifer and the resulting land subsidence will have wide-ranging environmental impacts that have not been analyzed or fully studied. Until that is done, no rational determination can be made of the environmental impacts of the project or the mitigation measures necessary.

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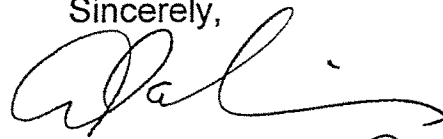
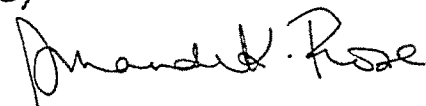
Indeed, the recent findings and opinions submitted by the USGS, at BLM's request, and those contained in a report of an independent San Bernardino County groundwater study suggest that the project must be re-evaluated for its purpose and need, and its environmental impact with respect to the drawdown of the groundwater in the region. If groundwater recharge rates are not accurately calculated, then the availability of water in the aquifer during dry years may obviously not be sufficient to justify the impacts this project will have — those presently known, and those expressly deferred by the Met. In addition, knowledge of the impacts to the surrounding region is dependent on an accurate hydrology study.

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Please take the time necessary to review all the data before presenting this project for approval. There is no rush. The water needs identified in the project are 20 years away. Surely several more months of study will not jeopardize the rate of growth in the southern California counties. Thank you for your attention to these matters.

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Sincerely,

Alan Siraco
Amanda K. Roze