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3/6/00

(submitted by FAX on 3/7/2000)

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

Dear Sir:

The Cadiz Groundwater Storage and Dry-Year Supply Program, as presented in the EIR, seems highly questionable and not clearly defined. Given the immensity of the groundwater depletion, the location near sensitive Wilderness areas, and the lack of clarity as to the percentage of stored water that will actually be recoverable, I feel that this proposal should be denied. At the very least, a supplemental EIR is necessary to fully address the deficiencies of this one. P13-1

To begin with, the touted wet year storage and dry-year supply element of this proposal amounts to only a third of the total water withdrawal applied for in the proposal's preferred alternative. A more accurate title for this EIR would be The Cadiz 2-Million acre-feet Groundwater Removal and (Separate) 1-Million acre-feet Storage and Retrieval Program. This alone is a serious problem with the EIR, if it is truly intended to be a document that the public can understand and respond to. Many who would not approve of this huge a groundwater depletion will not read or respond to this EIR as it appears to be a water storage and retrieval project alone. P13-2

GROUNDWATER REMOVAL: P13-3

The EIR's own figures on groundwater recharge (which are highly disputed by the United States Geological Survey) claim that up to 30,000 acre-feet of native groundwater can be recharged by natural sources each year (assuming there is any rainfall), and that the amount they intend to remove is rechargeable. Yet they propose to remove 150,000 acre-feet of groundwater per year, with an admitted overall land subsidence of 22 inches, and a 190-foot drop in groundwater levels. It is my understanding that once groundwater tables have been lowered and the surrounding rock has compacted accordingly, the previous water capacity can never be restored. Using these figures, each year of pumping groundwater will result in a permanent depletion of 120,000 acre-feet of water which may never be replenished.

There is no point in using non-renewable water sources as a short-term supply to a metropolitan area whose water needs are continually growing. The proposed pumping would drain the groundwater from an area extending vast distances beyond the privately held land of the Cadiz Land Company under many hundreds of thousands of acres of public lands. This groundwater has underlain these valleys for the last 10,000 years, and may have major ecological significance to the whole area (including but not limited to the Cadiz Dunes Wilderness Area, which directly adjoins the project area). It appears that not one study was done to determine what impact this proposed pumping would have on nearby wilderness areas. P13-4

And aside from the obvious impacts to the underground water table and to springs, there may be other impacts we cannot yet anticipate from such major changes to such a huge underground system. This is not a risk worth taking for what is merely a temporary drop in the bucket for the long-range water needs of Los Angeles. P13-5

The above is the scenario using the proposal's own figures of 30,000 acre-feet for annual groundwater recharge. However, the figures in the USGS (United States Geological Survey) report that was just issued on the question of groundwater recharge in this area estimate that only about 3,000 acre-feet can be recharged annually—only a tenth of the amount claimed in the EIR. This is a glaring and unresolved difference that the Bureau of Land Management and the public cannot ignore. If the project is not denied (as I feel it should be) on the basis even of the perhaps inflated claims of the proposal itself, a completely reworked supplemental EIR must be submitted that addresses the issues raised by the USGS report. P13-6

RIVER WATER STORAGE AND RETRIEVAL:

Another problem of the EIR is its inadequate presentation of the Colorado River water storage and retrieval portion of the Cadiz proposal. Specifically, no figures are given for the amount of water that will be lost due to down-slope underground run-off into the deep salt deposits underlying Bristol and Cadiz dry lakes, to the west and south of the storage site respectively. The EIR acknowledges that some of the stored water will do just that (pages 5-100 to 5-103) but it gives no figures or percentages for the total amount that would be lost. The project's diagrams of the underground strata show a definite downward slope of these strata towards the dry lakes. Is all of the "stored" water likely to run off into the deep, salt-filled depressions under the dry lakes? Half of it? A quarter? We have no figures and so no way to evaluate the efficacy P13-7

of storing valuable Colorado river water during wet years for uncertain retrieval during dry years. Nor does the EIR give any figures for annual water loss through evaporation during the percolation process. The EIR proposes taking 100 million acre-feet of water from the Colorado river, but does not tell us how much of that will actually be available for retrieval. This is another deficiency of the present EIR that needs to be corrected. P13-7

Furthermore, how can the Cadiz Land Co. or the Metropolitan Water District be sure that the Colorado River water they propose to store will even be available to them? Control over the disbursement of water from the Colorado River will have switched over to the Secretary of the Interior for the last 35 years that this proposed 50-year storage and retrieval project would be in operation. How can the Met be sure that this project will get, or continue to receive the water necessary for the storage and retrieval portion of this proposal? Unless this is addressed in the EIR, the public cannot evaluate the impact and cost-effectiveness of this proposal. P13-8

The insufficiencies of the EIR with regard to this storage and retrieval plan are particularly troubling in light of the close connections of Kieth Brackpool, the director and chief executive officer of the Cadiz Land Co. with Governor Gray Davis; the considerable campaign contributions the Cadiz Land Co. made to Davis during his gubernatorial bid; and the recent revelations that this project might receive millions of dollars in state subsidies if Prop. 13 passes on Tuesday—this being the result of a mysterious late add-on to the bill that was not widely publicized. Serious questions arise as to whether this water storage and retrieval proposal is truly a feasible project, or just a bottomless pit the state of California will throw money into and never get any water out of. Even in the best light, the whole proposal seems to be less about storing river water than about extracting non-renewable groundwater, which is not something most Californians would want to subsidize. P13-9

CADIZ DUNES WILDERNESS AREA and OTHER BLM DESERT LANDS: P13-10

The Cadiz Dunes Wilderness Area is right next to the proposed project area, and the proposed route for the project's pipeline and associated powerline and road would go right along the border of the wilderness. There is a seldom-used train track that follows the northeast boundary of the wilderness area which is where the project's proposed right of way would be located. I have visited and camped at the Cadiz Dunes, and can testify to the beauty and remoteness of the dunes as well as the surrounding landscape of open desert valleys and colorful mountains. At present, there is only a low, single wire, wood pole-supported electric line

along the railroad, which is about 3 miles away. This "power line" line is barely visible and not even functional—poles missing, and wire broken. This is a far cry from the 3-wire, 42-foot-tall metal power towers that the project proposes to install. In view of the proximity of the Wilderness Area and the unspoiled nature of most of the surrounding lands, this proposal should have included an alternative of burying the powerline underground to prevent negative impacts to the viewshed. P13-10

Elsewhere, the proposed project's right-of-way over public lands leaves the existing railroad corridor and forges across wide expanses of unspoiled desert lands, creating a whole new roadway, pipeline and powerline across a vast, BLM-managed roadless area. This is completely unnecessary. The Cadiz right-of-way should follow the existing railroad corridor whenever it can. This would prevent a redundant road/right-of-way in hitherto roadless open desert, which is an important natural resource in California's Desert Conservation Area. P13-11

According to the Met, this alternative (using the RR corridor) was considered but not incorporated into the EIR because it would be more costly than their proposed new right-of-way through the roadless area. This is not a legitimate reason to leave it out of the EIR. It should have been included as the environmentally preferred alternative. The public has the right to see such an alternative and judge its value for itself. And the Bureau of Land Management, as the manager of these public lands, also has a right to evaluate all the alternatives that may affect the area. P13-12

MONITORING:

The EIR makes no mention of any kind of program to monitor and control the rate of pumping etc, based on the effects on the water table and the environment. The monitoring plan should be explicitly set forth in the EIR so the public can evaluate it. Such a program should have both public and BLM oversight. This is another significant deficiency within this EIR that makes it necessary to call for a supplemental EIR. P13-13

FINAL NOTE:

In March of 1996 Keith Brackpool, director and chief executive officer of Cadiz Land Co. led a successful effort against the proposed Rail Cycle Dump near Cadiz, arguing that we must "...protect and preserve our precious water resources from the threat of contamination..." He now proposes to store a million acre-feet of untreated Colorado river water by mixing it into unpolluted native groundwater. P13-14

I strongly urge the Metropolitan Water District of Southern California to abandon this flawed plan. I urge the Bureau of Land Management to turn down this project and not allow it to deplete the native groundwater of our public lands, or to build new roadways and powerlines over open desert. If this project is not stopped right now, it must at least be required to address the glaring deficiencies and contradictions in its EIR and produce a supplemental EIR which the public can use to come to an informed decision. P13-15

Thank you for the opportunity to comment. P13-16

Sincerely,

Ingrid C. Crickmore