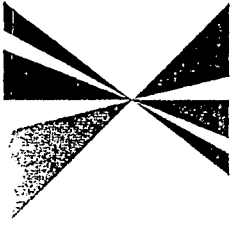


SOUTHERN CALIFORNIA



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February 17, 2000

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

R1

RE: Comments on the Draft Environmental Impact Report / Environmental Impact Statement for the Cadiz Groundwater Storage and Dry-Year Supply Program - SCAG No. I 19990538

Dear Mr. Reed:

Thank you for submitting the Draft Environmental Impact Report / Environmental Impact Statement for the Cadiz Groundwater Storage and Dry-Year Supply Program to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties and other agencies in reviewing projects and plans for consistency with regional plans.

R1-1

The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. If you have any questions regarding the attached comments, please contact Jeffrey Smith, Senior Planner, at (213) 236-1867. Thank you.

Sincerely,

J. DAVID STEIN  
Manager, Performance Assessment and Implementation

**COMMENTS ON THE  
DRAFT  
ENVIRONMENTAL IMPACT REPORT  
ENVIRONMENTAL IMPACT STATEMENT  
FOR THE  
CADIZ GROUNDWATER STORAGE AND DRY-YEAR SUPPLY PROGRAM  
SCAG NO. I 19990538**

**PROJECT DESCRIPTION**

The proposed Project consists of the construction and operation of an approximate 35-mile pipeline for conveying water between the Iron Mountain Pumping Plant on the Colorado River Aqueduct and the Cadiz/Fenner area, and a Cadiz Pumping Plant at the Metropolitan Water Districts' existing Iron Mountain Pumping Plant facility. In addition, the proposed Project will also include 390 acres of spreading basins for percolation of Colorado River water into the groundwater basin in the Cadiz/Fenner area, a wellfield for extracting stored and indigenous groundwater, and associated power poles and lines along the conveyance pipeline in the wellfield.

R1-2

The proposed Project would involve storage of a minimum of 1.0 million acre-feet depending on availability of Colorado River water for storage, storage or extraction at a rate of approximately 150,000 acre-feet per year, and transfer of up to 2.0 million acre-feet of indigenous groundwater depending on the natural recharge of the groundwater basin over the 50 year term of the proposed Project. Alternatives to the proposed project include the Western Alternative, Combination Alternative, Eastern Alternative, Eastern/Canal Alternative and No Project Alternative.

The proposed Project is located in the eastern Mojave Desert region of San Bernardino County in the Cadiz and Fenner valleys and crosses federal land administered by the Bureau of Land Management.

**INTRODUCTION TO SCAG REVIEW PROCESS**

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Transportation (adopted April 1998), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable

regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Transportation Plan (RTP) constitutes the region's Transportation Plan. The RTP policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

R1-2

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the Project with those policies.

**General SCAG Staff Comments**

The Draft EIR/EIS, in Sections 2.0 (Assessment of Project Need and Purpose), 5.3 (Socioeconomics) and 5.6 (Air Quality) addresses the relationship of the proposed project to **applicable regional plans** as required by Section 15125 [d] of *Guidelines for the Implementation of the California Environmental Quality Act*.

R1-3

**CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES**

**The Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to The Cadiz Groundwater Storage and Dry-Year Supply Program.

R1-4

**Core Growth Management Policies**

3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

R1-5

SCAG staff comments. The Draft EIR/EIS in Sections, 2.0 (Assessment of Project Need and Purpose) and 5.3 (Socioeconomics) discusses the relationship of the proposed Project to SCAG's population, housing and employment forecasts. The proposed Project will not have an impact on population, housing and employment.

The Project is consistent with this core RCPG policy.

R1-5

- 3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

R1-6

SCAG staff comments: The Draft EIR/EIS, on page 4-9, includes a discussion on the construction schedule for the proposed Project. Elements included in the construction schedule are the pumping plant, water conveyance facility, power distribution facilities, spreading basins and wellfields. Each item has a unique time frame for construction. However, a schedule for each specific item is not included in the Draft EIR/EIS. According to the Draft EIR/EIS, the proposed Project would be completed by the Winter of 2000/2001. The Project is consistent with this core RCPG policy.

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers

R1-7

- 3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

R1-8

SCAG staff comments. The Draft EIR/EIS in Sections 5.12 (Public Services) and 5.13 (Utilities and Service Systems) identifies public services, utility and service facilities to serve the proposed Project. The Project would not have an adverse impact on public services, phone, natural gas, electricity, water, stormwater, and solid waste facilities. Mitigation measures, however, are proposed to address coordination with emergency service providers and construction activities around the aforementioned utility and service systems. The Project is supportive of this ancillary RCPG policy.

- 3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

R1-9

SCAG staff comments. The Draft EIR/EIS in Section 1 (Introduction)

acknowledges that the proposed Project, "...would be required to obtain permits and approvals from federal, state and local/regional agencies...". Table 1-1 lists those agencies and the possible permits and approvals required. The Project is supportive of this ancillary RCPG policy.

R1-9

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPRVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

R1-10

3.18 *Encourage planned development in locations least likely to cause adverse environmental impacts.*

SCAG staff comments. The proposed Project is located in the eastern Mojave Desert region of San Bernardino County. The Project is designed in a manner, which will minimize identified environmental impacts. The mitigation measures included in the Draft EIR/EIS have been developed to address the identified environmental impacts; and to identify implementation procedures, responsibilities and timing for each mitigation measure. The Project is supportive of this ancillary RCPG policy.

R1-11

3.19 *SCAG shall support policies and actions that preserve open space areas identified in local, state and federal plans.*

SCAG staff comments. The Draft EIR/EIS in Section 5.17 (Wilderness/Recreation) addresses the potential impacts of the proposed Project related to wilderness and recreation facilities. The Project is adjacent to the Old Woman Mountains and Cadiz Dunes Wilderness Areas and the Johnson Valley to Parker Race Route. The Project would not conflict with any established wilderness and recreational uses. Mitigation REC-1 addresses construction activity in the vicinity of the Johnson Valley to Parker Race Route. In addition, mitigation measures in Sections 5.11 (Noise) and 5.14 (Aesthetics) address construction related noises, project views and lighting related to wilderness and recreation facilities. The Project is supportive of this ancillary RCPG policy.

R1-12

3.20 *Support the protection of vital resources such as wetlands, groundwater recharge*

R1-13

*areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

SCAG staff comments. The Draft EIR/EIS in Section 5.8 (Biological Resources) includes a discussion on plant and wildlife communities, special interest species and habitats (desert tortoise), and wildlife movement corridors. The proposed Project will have impacts on the aforementioned items. There are over 30 mitigation measures that specifically address these items. The Project is supportive of this ancillary RCPG policy.

R1-13

- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resource and archeological sites.*

SCAG staff comments. The Draft EIR/EIS in Sections 5.15 (Cultural Resources) and 5.16 (Paleontological Resources) identifies a number of cultural, archeological and paleontological resources. Mitigation measures outlined in each section have been developed to address identified impacts. Despite the mitigation measures, impacts to paleontological resources would be substantially reduced. However, the impacts may not be mitigated to below a level of significance. The Project is supportive of this ancillary RCPG policy.

R1-14

- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

SCAG staff comments. The Draft EIS/EIR in Section 5.4 (Topography, Geology, Seismicity and Soils) identifies potential impacts related to seismic ground shaking, liquefaction, soils, slope stability, erosion, drainage and flooding sedimentation and subsidence. Mitigation measures included in this section have been developed to address identified impacts through the implementation of building codes and specific requirements and/or project design. The Project is supportive of this ancillary RCPG policy.

R1-15

- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

SCAG staff comments. See SCAG staff comments on policies 3.09, 3.18, 3.20, 3.21 and 3.22. The Draft EIR/EIS in Section 5.11 (Noise), identifies noise impacts due to construction and operation related activities. Mitigation measures described in this section have been developed to address the identified impacts. The Project is supportive of this ancillary RCPG policy.

R1-16

## AIR QUALITY CHAPTER CORE ACTIONS

The Air Quality Chapter (AQC) core actions that are generally applicable to the Project are as follows:

- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

R1-17

SCAG staff comments. The Draft EIR/EIS in Section 5.6 (Air Quality) addresses air quality impacts related to construction and operation activities. Mitigation measures outlined in this section will address the identified impacts. Despite the mitigation measures, the identified impacts cannot be mitigated to below a level of significance. The Project is partially consistent with this core RCPG policy.

## WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters. The core recommendations and policy options that are particularly applicable to Project include the following:

R1-18

- 11.02 *Encourage "watershed management" programs and strategies, recognizing the primary role of local government in such efforts.*

R1-19

SCAG staff comments. The Draft EIR/EIS does not address the subject of "watershed management" programs and strategies. It would be helpful if the Final EIR/EIS would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine whether the Project is consistent with this core RCPG policy.

- 11.03 *Coordinate watershed management planning at the subregional level by (1) providing consistent regional data; (2) serving as a liaison between affected local, state, and federal watershed management agencies; and (3) ensuring that watershed planning is consistent with other planning objectives (e.g., transportation, air quality, water supply).*

R1-20

SCAG staff comments. See SCAG staff comments on policy 11.02. . It would be helpful if the Final EIR/EIS would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy. Based on the information provided in the Draft EIR/EIS, we are unable to determine whether the Project is consistent with this core RCPG policy.

R1-20

- 11.05 *Support regional efforts to identify and cooperatively plan for wetlands to facilitate both sustaining the amount and quality of wetlands in the region and expediting the process for obtaining wetlands permits.*

SCAG staff comments. The Draft EIR/EIS does not address the subject of regional efforts to identify and cooperatively plan for wetlands. It would be helpful if the Final EIR/EIS would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy. The Draft EIR/EIS, on page 1-11, includes a short discussion on project approvals and permits. However, based on the information provided in the Draft EIR/EIS, we are unable to determine whether the Project is consistent with this core RCPG policy.

R1-21

- 11.06 *Clean up the contamination in the region's major groundwater aquifers since its water supply is critical to the long-term economic and environmental health of the region. The financing of such clean-ups should leverage state and federal resources and minimize significant impacts on the local economy.*

R1-22

SCAG staff comments. The Draft EIR/EIS, in Section 5.5 (Water Resources) includes a discussion on groundwater. Mitigation measures in this section calls for the establishment and implementation of a Monitoring and Management Plan to, "...monitor, maintain and regulate all groundwater extraction and storage operations within the Project area..." (page 5-105). The Project is consistent with this core RCPG policy.

- 11.07 *Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

R1-23

SCAG staff comments. The Draft EIR/EIS does not address the issue of water reclamation. It would be helpful if the Final EIR/EIS would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy. Based on the information provided in the Draft EIR/EIS, we are unable to determine whether the Project is consistent with this core RCPG policy.



**CONCLUSIONS AND RECOMMENDATIONS:**

1. As noted in the staff comments, Cadiz Groundwater Storage and Dry-Year Supply Program is consistent with or supports many of the core and ancillary policies, actions and goals in the Regional Comprehensive Plan and Guide (RCPG), and Regional Transportation Plan (RTP).
2. Based on the information in the Draft EIR, we are unable to determine whether the Project is consistent with core policies 11.02, 11.03 and 11.05. The Project is partially consistent with core policy 5.11.
3. The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide and discuss any inconsistencies between the proposed project and applicable regional plans. The response should also discuss any inconsistencies between the proposed project and applicable regional plans. We suggest that you identify the specific policies, by policy number, with a discussion of consistency or support with each policy.
4. All mitigation measures associated with the project should be monitored in accordance with CEQA requirements.

R1-24

R1-25

R1-26

R1-27

## SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

### *Roles and Authorities*

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, the Association is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). Among its other mandated roles and responsibilities, the Association is:

R1-28

Designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. 134(g)-(h), 49 U.S.C. 1607(f)-(g) et seq., 23 C.F.R. 450, and 49 C.F.R. 613. The Association is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.

Responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). The Association is also designated under 42 U.S.C. 7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

Responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. 7506.

Responsible, pursuant to California Government Code Section 65089.2, for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. The Association must also evaluate the consistency and compatibility of such programs within the region.

The authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

Responsible for reviewing, pursuant to Sections 15125(b) and 15206 of the CEQA Guidelines, *Environmental Impact Reports* of projects of regional significance for consistency with regional plans.

The authorized *Areawide Waste Treatment Management Planning Agency*, pursuant to 33 U.S.C. 1288(a)(2) (Section 208 of the Federal Water Pollution Control Act)

Responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

Responsible (along with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.