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March 8, 2000

R4

Mr. Dirk Reed

Metropolitan Water District of Southern California
Water Resource Management Group
P.O. Box 54153
Los Angeles, CA 90054-0153

Subject: DRAFT EIR/EIS for CADIZ GROUNDWATER STORAGE AND DRY YEAR SUPPLY PROGRAM

Dear Mr. Reed:

The Municipal Water District of Orange County has reviewed the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Cadiz Groundwater Storage and Dry-Year Supply Program (Cadiz Project) and offers the following comments for further consideration.

Our comments relate to either (1) assumed amounts of surplus Colorado River and/or native waters available; (2) description of project need and project alternatives; or (3) potential environmental issues associated with operation of the spreading basins and well field.

R4-1

The comments are meant to result in improved descriptions of Project Need and Project Alternatives, as well as an improved discussion of potential impacts and mitigation measures related to operation of the spreading basins and well field.

Comment 1: Need for Project (ES-5 and Section 2)

- The discussion on Project Need should include additional information regarding the efforts currently underway to develop a California 4.4 Plan for Colorado River use. The availability and permission to store surplus Colorado River water, as part of the terms of a California Plan is an important assumption for the conjunctive use storage feature of the project.

R4-2

- The estimated shortfall of 170,000 AF in 2020 assumes no additional long-term or dry-year option transfers from Imperial Irrigation District, Palo Verde Irrigation District (PVID), or other parties on the River. In particular, we do not understand why a PVID dry-year option arrangement would not be one of the potential alternatives to a portion of the dry year yield generated in the Project. Metropolitan completed a successful demonstration project with PVID in 1995, which conserved 186,000 AF over a two-year period, at a cost of \$135/AF.

R4-3

- Without the project or any of the listed alternatives what would the impact be on interruptible water sales programs Metropolitan operates for Agriculture and Groundwater Replenishment? Would interruptions be more frequent?

R4-4

- Could some of the surplus Colorado River water be stored in local groundwater basins within the Metropolitan service area and retrieved during future shortages?

R4-5

Comment 2: Operations and Maintenance – Project Spreading Basins (ES-16):

R4-6

- How will excess fine materials, silt and scum, which can accumulate in spreading basins over time, be removed and disposed of? What are the possible impacts and what mitigation measures are proposed for these operations?

- Will the spreading basins create new wetlands type habitat or attract *species of interest* when in the wet mode of operation? What impacts may occur, and what mitigation measures are proposed when the basins are taken from a wet mode to a dry mode?

R4-7

Comment 3: Operations and Maintenance - Project Well Field Facilities (ES-16)

R4-8

- *"Routine inspection would be performed weekly and/or monthly."* More frequent site visits may be required to verify security, public safety and operational integrity of the well field and spreading basins. However, the proposed mitigation measures would appear appropriate even with higher frequency of site visits.

In reviewing the EIR/EIS we noted that several potential Project impacts would require mitigation through a Groundwater Monitoring and Management Plan (mitigation measure WR-1). While this appears to be an appropriate mitigation strategy, implementation of this mitigation measure may result in reduction of anticipated Project performance (i.e. - yield, recharge, storage, and/or pumping withdrawal capabilities). Since this is not an issue directly within the scope of the EIR/EIS, we will communicate our concerns about the implications of potential reduced project performance in a separate letter.

R4-9

We appreciate the opportunity to comment on the EIR/EIS.

R4-10

Sincerely,



Matthew G. Stone, PE
Associate General Manager, Planning

cc: Stan Sprague