California Regional Water Quality Control Board
Colorado River Basin Region

Winston H. Hickox
Secretary for Environmental Protection

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Gray Davis
Governor

February 22, 2000

ATTN: Mr. Dirk Reed
Metropolitan Water District
Water Resource Management Group
P.O. Box 54153
Los Angeles, CA 90054

ATTN: Mr. James Williams
Bureau of Land Management
California Desert District
6221 Box Springs Blvd.
Riverside, CA 92507-0714

S3

Dear Messrs. Reed and Williams:

SUBJECT: SCH NO. 99021039 CADIZ GROUNDWATER STORAGE AND DRY-YEAR SUPPLY PROGRAM DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT

Thank you for the opportunity to comment on the subject document.

Regarding the proposed project, we are primarily concerned about the overall water quality impact that may result from recharging an aquifer of high water quality with water of lesser quality. This includes maintaining the drinking water standards for all constituents. Also, we are concerned about salts and perchlorate that are present in the source water, as addressed in the EIS/EIR. The presence of MTBE would be an additional concern since it does not readily degrade when introduced to groundwater. S3-1

Our first comment is in regards to the following statement (page 5-95),

> "No Colorado River water is anticipated to migrate to the Bristol or Cadiz dry lakes during the Cadiz project. As a hypothetical scenario, however, because Colorado River water contains more sodium and calcium than the indigenous groundwater, any Colorado River water that migrated to the dry lakes and evaporated would contribute even more sodium and calcium to these dry lakes for the production of calcium chloride and sodium chloride. The availability of chloride in the brine underlying the dry lakes would facilitate production of these compounds, and be beneficial."

S3-2

It is unclear why increased production of calcium chloride and sodium chloride would be beneficial to the Bristol or Cadiz dry lake systems.

Further, we believe the EIS/EIR should address the likelihood that the proposed project has for increasing the hydraulic continuity/connectivity between the Cadiz aquifer and the saline aquifers underlying the Bristol and Fenner dry lakes; and the potential for an increase in salinity in the Cadiz Aquifer should hydraulic continuity be an issue. S3-3

Please contact Summer Bundy at (760) 776-8937 should you have any questions regarding these comments.

Sincerely,

JOSE L. ANGEL, P.E.
Chief of Basin Planning

JLA:sb

CC: State Clearinghouse

File: ER WDA