



# Morongo Basin Conservation Association, Inc.

POSTOFFICE BOX 218

TWENTYNINE PALMS, CALIFORNIA 92277

February 18, 2000

Metropolitan Water District  
Water Resource Management Group  
P. O. Box 54153  
Los Angeles, CA 90054-0153  
Attention:  
Mr. Dirk Reed (213) 217-6163  
✓ Mr. Jack Safely (213) 217-6981

Bureau of Land Management  
California Desert District  
6221 Box Springs Boulevard  
Riverside, CA 92507-0714  
Attention:  
Mr. James Williams (909) 697-5390

G2

RE: Draft EIR/EIS Cadiz Groundwater Storage and Dry-Year Supply Program

As stated within the Draft EIR/EIS, the purpose and scope of the documentation is to provide public agencies and the general public a detailed project description and analysis for evaluation of the potential environmental impacts and mitigation measures for the proposed project.

G2-1

Due to the massive volume of the report, the analysis and evaluation done by members of the Morongo Basin Conservation Association (MBCA) identified issues we consider vague, not addressed or possibly overlooked. Accordingly, we request a Supplement to the EIR/EIS be issued that will respond to concerns already received, special emphasis placed to detailing the Groundwater Monitoring & Management Plan (WR-1) plus our particular concerns listed below. Distribution of the Supplement would provide information for agency and public comment relative to the potential or actual environmental impacts.

G2-2

I. How was Metropolitan Water District of Southern California (Met), a proponent, chosen to be the California Environmental Quality Act (CEQA) Lead Agency and approving authority when the project is located in non-Metropolitan water districts?

G2-3

II. Taking into consideration our understanding that California law allows an owner of land over a basin to pump water for the reasonable and beneficial use on his property, what is the rationalization that water in the Cadiz project can be for Met use?

G2-4

III. Please provide the following information in the Supplement:

G2-5

How were the water rights for the Colorado River allocated in the past, including Mexico?

Are there projected changes to this allocation over the life of the project -- 50 years?

G2-6

What are the potential needs of and impacts on non-Cadiz desert water areas as well as other states with water rights?

G2-7

IV. Figure 2-2, Metropolitan Member Agencies, is illegible and therefore cannot serve as an information document. Replacement is requested.

G2-8

V. Considerable verbiage was included in the EIR/EIS relative to conservation methods used or to be implemented by Metropolitan. Specifics appear to be missing. It is our

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hope and desire that desert community standards and limitations on water conservation will be met and exceeded wherever possible. Of the enhanced water conservation programs covered, what is the time line for implementation, how are or will these practices be enforced, and discuss the current or future status of:

- Water meter limitation
- Building restriction(s)
- Car washing restrictions
- Pricing increments when average residential consumption is exceeded.

G2-9

Are financial incentives for conservation beyond those offered to Met member agencies available to any other customers? If not, are any planned with a firm or projected implementation date?

G2-10

What is the status of public information, education and major media campaigns as a result of Met's urging water conservation?

G2-11

At what stage is implementation relative to residential retrofit, home audit, leak detection, and landscape water audit programs?

G2-12

VI. Reference Page 5-4, Report No. 1157:

**Williamson Act Contracts Lands**

There are no Williamson Act contract lands in the Cadiz Project area.

What are Williamson Act contract lands? Please include a definition in the Supplement along with the affect or relationship to the storage project.

G2-13

VII. Is there a purchase requirement for comparable parcels of land in exchange for biologically sensitive parcels that will be affected by the project? If so, include the status of the exchange.

G2-14

VIII. Due to the unknown status of WR-1, and our subsequent opportunity to comment being unknown at this time, here are some concerns we ask be considered for incorporation in the plan, and as appropriate, inclusion in the Supplemental EIR/EIS:

G2-15

Of primary concern to WR-1 is a commitment regarding the quantity of water taken from storage and that Metropolitan will not transfer more than the annual storage input. Please provide your position and how WR-1 will monitor the process.

Is it known how much of the aquifer water is fossil and how much is recharge water?

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How can the public be assured the lower limits of the recharge estimates will not be exceeded to preclude overdrawing of the aquifer?

G2-17

Will there be a definite depth limit to which the aquifer will be drawn? Will it be the top of the aquifer? How many wells will be used for monitoring and how will they be selected?

G2-18

If the saline migration from Cadiz Dry Lake shows movement toward Cadiz desert land, will pumping cease until the aquifer recharges enough to stop the migration? Please include in your discussion and plan how this monitoring will be done.

G2-19

What are the built-in factors (triggers) that would stop this project temporarily and/or permanently? Will these triggers be in place at the beginning of the project? If not, when will they be placed? Once the triggers are in place, are they changeable or unchangeable? What authority would have power to make changes?

G2-20

With the many opportunities for toxic pollution along the course of the Colorado River, what monitoring methods will be devised to analyze future potential constituents in the river, i.e., toxins, radioactivity, etc.? Subsequently, what control methods would be used?

G2-21

Are there conditions whereby water will be transferred on an emergency basis? If so, please explain.

G2-22

It is assumed Met, BLM, Cadiz, county representatives, and water agency members are/were part of the WR-1 oversight committee. Please identify the committee used in planning to date. If not included now, we ask your consideration for the following representation:

G2-23

Representative from a desert water district, non-MWD,  
County Flood Control Department,  
Civic representative from a desert community, to be chosen by lot, and  
A member of a local or specific desert environmental group.

Will the composition of the WR-1 committee remain constant? Is there time for the additional requested personnel to participate if planning is not complete? We request these additional participants be full members with voting privileges. If prohibited by law, we request they be ex officio members with full access to all meetings and information involving the committee.

G2-24

Please provide information on public meetings held by the committee. Examples: How often will they meet, will meetings be rotated to different locations, etc.? Will the public be invited to meetings and given the opportunity to comment?

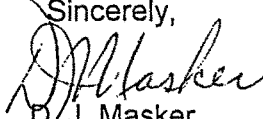
G2-25

We ask you to include all other known facts of this nature to allow the public to participate.

G2-26

Please contact me at 760 367-7004 if you have questions regarding these comments

G2-27

Sincerely,  
  
D. J. Masker  
Director