

March 6, 2000

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Mr. Dirk Reed  
Mr. Jack Safely ✓  
Metropolitan Water District  
Water Resource Management Group  
P.O. Box 54153  
Los Angeles, CA 90054-0153

G7

Mr. James Williams  
Bureau of Land Management  
California Desert District  
6221 Box Springs Boulevard  
Riverside CA 92507-0714

Re: CADOZ GRPIMDWATER STPRAGE AND DRY-YEAR SUPPLY PROGRAM,  
Draft Environmental Impact Report/Draft Environmental Impact Statement, SCH. No.  
99021039.

Mr. Reed, Safely and Williams:

The San Bernardino Valley Audubon Society (SBVAS) respectfully submits the following comments in opposition to the above EIR/EIS.

] G7-1  
] G7-2  
] G7-3  
] G7-4  
] G7-5

- (1) A much more intensively focused and sensitive survey of plant and animal species should have been conducted for all species, in particular the desert tortoise, American badger, Yuma mountain lions and Nelson's bighorn sheep.
- (2) There needs to be a thorough analysis of the significant negative impacts to desert species when all the springs and other water sources fed by the underground water basins in this area are depleted by this and other associated water mining projects. The impact of water depletion on desert species has effectively been ignored in the EIR/EIS.
- (3) The potential for the spreading basins to create avian cholera and avian botulism that will significantly impact migratory bird and other wildlife species has also been ignored.
- (4) The Growth-inducing impacts for all of the MWD service area (much of Southern California) has also been ignored. Obviously, if ample water can be supplied by this project for dry years, then many tens of thousands more homes and

businesses can be built than would be possible without this project. Merely quoting SCAG or other population projections is not sufficient analysis of the significant growth inducing impacts of this massive water mining project.

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(5) The cumulative impacts, in addition to the cumulative growth inducing impacts, have also been ignored. As more and more water is mined by this and related projects (such as the Cadiz farming project) there will be increasing negative impacts both to wildlife and to nearby human water users.

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(6) The impacts on the progress of the San Bernardino Valley MSHCP and the Western Mojave Regional Plan have also been ignored.

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(7) The watershed model utilized in the EIR/EIS to analyze and verify the high recharge rate alleged is inherently flawed for reasons which have been thoroughly outlined in comments submitted by other experts and public agencies. In fact, it appears that there will be little or no recharge of the groundwater and that this is simply and purely a water extraction project. That water extraction scenario has not been analyzed in the EIR/EIS. (see letter from Wes Reeder to John Goss and various USGS reports submitted as part of this administrative record.)

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(8) The draft EIR/EIS fails to take into account the current allotment given to the CADIZ Agricultural Company in 1993 for farming. Without an accurate disclosure of the amount of water already allotted to Cadiz and other users in the area, there can be no meaningful discussion of the further significant impacts of this ground-water extraction project.

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The SBVAS requests that this EIR/EIS be withdrawn and redrafted to include the above missing information and analysis, so the public can be fully informed of the significant negative environmental impacts of this water mining project.

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Sincerely,

*Susan L. Nash*

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Conservation Chair  
San Bernardino Valley Audubon Society