



Desert Survivors
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BUREAU OF
LAND MANAGEMENT
NEEDLES RESOURCE AREA
NEEDLES, CA

G17

Molly Brady
Needles Field Office Manager
Bureau of Land Management
101 West Spikes Road
Needles, CA 92363

**RE: CADIZ Groundwater Storage EIR -
Supplemental EIR, Extension of Comment Period Requested**

Dear Ms Brady:

Desert Survivors recently received the Draft Environmental Impact Report for the Cadiz Groundwater Storage and Dry-Year Supply Program. We have completed an initial review of the material, formulated some questions, and have called and talked to staff of both the Metropolitan Water District and the Bureau of Land Management regarding the proposed project. There are several disturbing features:

G17-1

Significant Native Groundwater Overdraft at End of ALL Scenarios

G17-2

No Overall Groundwater Monitoring Program or Agency Accountability

G17-3

Lack of Data or Monitoring Plan for Nearby BLM Wilderness Springs

G17-4

Inconsistent and Missing Groundwater Balance Data in Scenarios

G17-5

Vague and Missing Data on the Percentage of "Stored" Water which is Retrievable

G17-6

No Coordination Plan for Simultaneous Groundwater Removal by Agriculture

G17-7

No Supporting Evidence for 30,000 acre-feet as Sustainable Groundwater Removal

G17-8

We need more time to react to this. This document is incomplete, inconsistent and does not present a plan which will allow a sustainable native groundwater regime. I understand from the Metropolitan Water District staff that they are currently working on a groundwater monitoring plan which may answer some of these deficiencies. I believe the public should have an opportunity to comment on a complete document. Either issue a supplemental EIR or release the monitoring plan as an appendix and allow an extension of the comment period so we can make reasonable comments on a better developed plan; not on the confusing, incomplete material available at present.

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G17-11

Groundwater issues have not so far been a large concern of the BLM in public lands management. However as our population builds and the pressures to consume increase, the schemes to extract the contents of these ancient natural reservoirs will increase as well. Desert Survivors supports efforts made by agency land managers to defend these natural resources in a sustainable manner for future generations. Lets have a full study of these groundwater issues. Using groundwater basins for storage may be a good idea if handled responsibly with full study and complete disclosure. This is NOT the case so far with the Cadiz Project. Don't yield to the temptation to give away this water for short-term gain; some of the effects will stay forever.


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G17-15

Sincerely yours,



Bob Ellis, Director at Large
bobellisds@earthlink.net
Desert Survivors

cc: Tim Salt, BLM Desert District Manager
Al Wright, State BLM Director