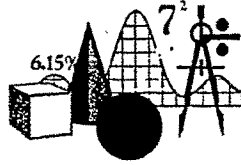


Ramon A. Mendoza



20 January, 2000

P2

Dirk Reed
MWD of Southern California
P.O. Box 54153
Los Angeles, CA 90054-1053

Having completed reviewing the Draft Environmental Impact Report/Statement (EIR/EIS), I want to provide the following for the record:

P2-1

- Review of Public Comments, Table 2, Summary of February 25, 1999, Ramon Mendoza

P2-2

- 2nd Bullet; Are we creating a vacuum taking from other basins?
 - This refers to the question asked about concern for water sources that may be interconnected with the Ward Valley and Chemehuevi Valley aquifers, into the Fenner/Cadiz project area. The point as documented seems lost in the mix of nonessential comments that were apparently said during the discussion in which the main point is as stated herein.

- 4th Bullet; Requests that a study be done on the effects on all adjacent basins [those that surround Bristol, Cadiz and Fenner watersheds with those, such as Ward Valley. This too refers to the 2nd Bullet, specifically that at a minimum electro-resistivity tests be conducted, perhaps as part of the monitoring program.

P2-3

Other points are, (Taken from the Environmental Planning Technical Reports, Vol. I & II):

P2-4

Section 5.2:

The average thickness of the upper aquifer at the Fenner Gap is approximately 500 feet (page 39, Vol. I) The maximum thickness of the lower aquifer is unknown but may reach over 6000 feet in the vicinity of Bristol Dry Lake (Maas1994)

Neither upper or lower aquifer water yield (% extraction) from a volume is projected. The same is true of the 3rd aquifer, "Based on findings during recent drilling work in the Fenner Gap area...located beneath the lower aquifer, contains groundwater and is considered a third aquifer unit (page 40, Vol. I)."

Section 5:

P2-5

As discussed in Section 6, estimates of the average amount of recoverable water (surface runoff plus ground water recharge) available to the Project area range from approximately 15,000 to 37,000 acre ft./yr. Based on the results of testing and analysis described in Section 7 and groundwater flow modeling described in Section 8, the amount of groundwater available to the Project area on an annual basis is estimated to be approximately 30,000 acre ft./yr. (page 41, Vol. I)

Section 5.7:

The mountain ranges that define the boundaries of the watersheds as well as the aquifer systems that underlie the Project area are composed primarily of impermeable granite and metamorphic bedrock (see Figure 13). Accordingly, the aquifer system occurs within contained area from which groundwater cannot escape.[how determined?] (page 45, Vol. I) Thus, a hydraulic connection between Bristol, Cadiz and Fenner watersheds and the neighboring groundwater basins is not likely [an assumption].

P2-5

Note: Section 8, subsections 8.5.2 and 8.6 provide that the system would provide on/off initiates to the wells to maintain a constant 200 cfs flow rate. Further, historically, smaller amounts of water are recorded withdrawn since 1910. All amounts, totaling about 85,000 acre feet.

Given the project will store water taken from the Colorado Water Aqueduct and withdraw water from the Cadiz aquifer (150,000 ac-ft. during dry years)[a San Bernardino resource], it seems important to monitor the following:

P2-6

- 1) Rate of withdrawal from the Cadiz aquifer, based on safe yield [to be determined]
- 2) Radioactive contamination/Ward Valley (threat from the proposed low-level nuclear dump)
- 3) Science of aquifer interconnection with other surrounding basins [test]
- 4) Determine volume of Project aquifers and that of surrounding basins, especially, should testing (electro-resistivity) show interconnection
- 5) Additionally, neighboring San Bernardino communities should receive allotment of water from this project, transferable credits on dry-years based on withdrawal of water by MWD

P2-7

P2-8

P2-9

P2-10

P2-11

Cordially,

Ramon Mendoza

C: Molly Brady/BLM Area Manager, Needles