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February 29, 2000

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

P7

RE: DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT
CADIZ GROUNDWATER STORAGE AND DRY-YEAR SUPPLY PROGRAM

Dear Sirs:

Thank you for the opportunity to comment on the Draft Environmental Impact Report/Environmental Impact Statement ("DEIR/S") for the Cadiz Groundwater Storage and Dry-Year Supply Program ("Project").

P7-1

Due to a lack of critical information in the areas noted below, I am requesting that a Supplement to the DEIR/S be issued, with subsequent appropriate public comment period, before a Final EIR/S is issued. As the DEIR/S currently stands, it does not provide an adequate basis for making a reasonable assessment of potential environmental effects of the Project. It also does not adequately address issues raised in the scoping process.

P7-2

I request that in the Supplement the following issues be addressed and, as well, I request that you also incorporate by reference the issues raised by Christine Carraher's letter of March 16, 1999 to Debra Mann of Metropolitan Water District of Southern California ("MWD") in response to the Project scoping process and not fully addressed in the DEIR/S.

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First, we do not understand how the Metropolitan Water District qualifies as the lead agency on its own project, with the responsibility of certifying the adequacy of its own EIR/S. Please explain this in detail, with references to the applicable sections of CEQA.

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Second, in the sections Assessment of Project Need and Purpose, Cumulative Impacts, and Short Term Versus Long Term Productivity Impacts, the DEIR/S does not consider meaningful conservation measures for within MWD districts, nor potential impacts on non-

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Cadiz desert areas outside of the MWD member areas. The Project proposes to remove indigenous desert ground water for a period of at least 50 years. The DEIR/S dismisses the loss of the use of this resource to desert districts by stating that the Cadiz area is remote, with little development, infrastructure, etc. In the desert areas water is so scarce that all sources are important - even if they are 50 or 100 miles away. The Cadiz water resource is potentially usable to many desert communities. Therefore, the EIR/S needs to assess the impacts of the loss of the use of this resource for a 50-year period on all the area desert communities (for instance, Ludlow, Barstow, Needles, the Morongo Basin, Amboy, etc.), including but not limited to socioeconomic impacts.

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Additionally, as this is desert water that is being removed, the proponents should demonstrate that they are meeting the conservation and use-restriction standards of the strictest of these desert communities and water districts - including limitation on issuing of water meters. The DEIR/S submits that water restriction measures do not affect growth, but if the number of new water meters issued annually in MWD member areas was as severely restricted as it is in some desert communities, growth would most certainly be limited - and the Need equation would change.

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Third, the Groundwater Monitoring and Management Plan ("WR-1") is the single most important reason for issuing a Supplement. The public must have more details of this measure before being able to assess the potential environmental impacts of the Project. The extreme vagueness of this vital measure as it stands now has left a disturbing amount of "wobble room", as we detail more below.

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We have been told elsewhere that this Measure and its critical components will be administered and overseen by a committee to be made up of essentially just MWD and Cadiz Inc. - the proponents of the Project ('Proponents'). Because of the "wobble room", it is crucial to build in to WR-1 a mechanism for full public oversight and participation. Water is a resource for the people of this state and this nation. It cannot be the sole province of merchants. It is vital to human - and environmental - survival.

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Therefore, we propose that if there is to be a committee to administer WR-1, it include the following:

1. a member of a local (S.B. county desert area) environmental or specifically desert environmental organization;

2. a member of a regional or national environmental organization with more expertise on broad water issues;
3. a civic representative of the desert communities, to be chosen by lot; and
4. a representative of a desert water district, non-MWD.

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We propose that these persons have full membership rights in this committee or, if that is prohibited by state law, that they have membership priveleges with full access to meetings and information involving the committee, but without voting rights.

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We also propose that there be specific mechanisms for general public access and comment to the administration of WR-1, including access to all data generated.

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Regarding specific water issues, in the DEIR/S there is no analysis of the possible effects of potential future contaminants in Colorado River quality, including toxics and radioactivity, even though with the river's long course through several states such contamination may reasonably be expected to occur over the life of the project. Such analysis is needed. Also, WR-1 includes no provisions for monitoring and remediation of Colorado River water quality before it is placed in the groundwater, at a time when pollution of the groundwater would be easy to prevent, as opposed to the unproven fantasy of clean-up of the groundwater basin after it is has been polluted.

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There is also not adequate analysis in the DEIR/S on the effects to surface conditions of increases and decreases in groundwater elevation, and WR-1 is vague and lacking in specifics regarding monitoring and remedial actions of subsidence effects outside the Project wellfield area.

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Perhaps most importantly, WR-1 is also vague and lacking in specifics as to how extraction and recharge are to be measured. In terms of quantity, it says only that wells will be monitored at least annually and if it is determined that this is causing adverse effects, etc., etc. However, it gives no specifics or numbers on total amount of extraction. Trigger thresholds are not specified but are left up to the judgement of the Proponents ("wiggle-room"). Clearly, measuring recharge rates to the groundwater basin is the crux of the matter. The DEIR/S does not demonstrate conclusively what those rates are, nor are we told how they will be measured. How can it be shown there will be no overdraft, if those rates are not reliably known? Trigger thresholds are not specified.

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And finally, we need, again, specifics: What will be the levels and conditions remaining at the end of the project?

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Thank you for your consideration of these comments.

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Sincerely,



Christine Carraher


Jerry Smith

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

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March 16, 1999

Debra Man, Chief
Planning and Resources Division
Metropolitan Water District of
Southern California
P.O. Box 54153
Los Angeles, CA 90054-0153

RE: Cadiz Groundwater Storage and Dry-Year Supply Program

Dear Ms. Man:

Thank you for the opportunity to respond to the Notice of Preparation of a Draft Environmental Impact Report for the Cadiz Groundwater Storage and Dry-Year Supply Program ("Project").

P7-18

I believe there are a number of critical areas that must be addressed in the Environmental Impact Report ("EIR") in order for the public to make an informed assessment of the Project. The following issues need to be covered and fully analyzed in the EIR:

I. **WATER QUALITY**

1. Colorado River quality, not only total dissolved solids but also specific chemical composition (including all potential toxics) and radioactivity.
2. Present water quality in the aquifer system ("Aquifer System") underlying the Cadiz and Fenner valleys.
3. Overall quality effects of mixing Colorado River water with Aquifer System water.

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II. **WATER SUPPLY**

1. Colorado River water claims and allocations, including those of Mexico, and projections of potential changes over the next 50 years.
2. Present and future water supply and demand in the Southern California area. This should include analysis of supplies and demands for all of Southern California, not solely the service area of Metropolitan Water District of Southern California ("MWD"), with additionally a specific analysis of supplies

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- and demands in Mojave desert ("Desert") areas that could conceivably be served by Aquifer System supplies. P7-21
3. Specific amounts and regulatory requirements regarding any indigenous Aquifer System water that potentially would be removed. P7-22

III. DEVELOPMENT/POPULATION ISSUES

1. The possibility of reciprocal regulation of rampant housing/commercial/industrial/transportation development ("Development") in Southern California and MWD service areas so as to discourage continued suicidal increase in demand for water, an increase for which this Project has the potential to serve as an enabler and thereby help foster the ultimate disaster of utter depletion and destruction of resources - not a favor to anybody. P7-23
2. The possibility of the institution of strict water conservation measures in MWD service areas in reciprocity for tampering with and depleting water resources in the Desert. P7-24
3. Effects on Development in Desert areas through loss of potential water supply, and attendant Environmental Justice issues. P7-25

IV. LOCAL ENVIRONMENTAL EFFECTS

1. Effects of spreading basins and potential canal-type conveyance facilities on local ambient humidity. P7-26
2. Effects of facilities on biological resources, particularly of physical-plant obstruction on species mobility; human intrusion on species health; water quality and quantity changes on species health, including impacts on access and use; subsidence, erosion and other soil and geological impacts on individual species and the integrity of the entire local biosystem. P7-27
3. Effects of subsidence, erosion and other soil and geological impacts on the integrity of the entire local ecosystem, including hydrological and seismic aspects. P7-28

V. AESTHETICS

1. Visual changes from all local viewpoints, including those approached on foot and not just those easily accessed by motor vehicles. P7-29

VI. LAND USE AND PLANNING

1. Any and all potential impacts to designated Wilderness Areas, including vistas and other effects from extra-Area activities. Note: There is a confusing typographical error in the NOP under "Land Use and Planning" in the Potential Environmental Effects section, to wit: "The Project traversing these Wilderness Areas." [sic]

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It should be noted that all analyses should examine effects projected to at least the next 50 years - the life-term of the project.

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Again, thank you for the opportunity of responding. I look forward to receiving all future public documents issued on this Project.

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Sincerely,



Christine Carraher