

**DEPARTMENT OF FISH AND GAME**

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Mr. Dirk Reed, Project Manager  
Metropolitan Water District  
P.O. Box 54153  
Los Angeles, California 90054

February 22, 2000

S4

Dear Mr. Reed:

The Department has reviewed the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Cadiz Groundwater Storage and Dry-Year Supply Program. The project proposes to construct a conveyance facility and spreading basins to deliver Colorado River water to the aquifer underlying the Cadiz and Fenner Valleys. The water will be stored in wet years and withdrawn in dry years. Indigenous groundwater will also be withdrawn during the dry years. In addition, a well field for extracting Project water from the Cadiz/Fenner aquifer, and associated power poles and lines will also be constructed. The project area is located in eastern San Bernardino County in the Cadiz and Fenner Valleys.

The Department commented on the Notice of Preparation for the project and raised several issues. These included the impacts to the natural water table and how this will affect the natural springs in the surrounding mountains; the potential for botulism outbreaks at the spreading basins; and the potential for raptor electrocution on the power line. These issues were not adequately addressed in the Draft EIR/EIS. In addition, the Department does not support the Eastern/Canal Alternative due to the large number of impacts to wildlife associated with this alternative.

S4-1  
S4-2  
S4-3

The Draft EIR/EIS discusses the springs in the Clipper Mountains and how there will be no impacts to them from the project, but does not discuss the springs in other surrounding mountain ranges such as the Old Woman Mountains. These are critical water sources for bighorn sheep and other wildlife and are located within the Fenner and Cadiz watersheds as described on page 5-66. An analysis of any impacts, along with appropriate mitigation must be included. The Department recommends that monitoring of these springs be done as part of mitigation measure WR-1.

S4-4  
S4-5

The Draft EIR/EIS does not discuss the length of time water is anticipated to be present in the spreading basins. It does indicate that this could be a benefit, but does not discuss the potential for botulism outbreaks. In addition, depending upon the length of time the water is expected to be present, it could create a dependency by wildlife on a water source that will eventually disappear.

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Guidelines are available on power line construction methods that can reduce the potential for electrocution of raptors. These should be included in the document as a mitigation measure. : ]

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Thank you for the opportunity to comment on this document. Please direct any questions to Kimberly Nicol, Associate Biologist, at (760) 251-4827.

Sincerely,



Glenn Black  
Supervisor  
Habitat Conservation - South

cc: G. Walker, USFWS, Barstow