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SAN BERNARDINO COUNTY DISTRICT
RIVERSIDE, CA.

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

Jack Safely
Water Resources management Group
Metropolitan Water District
PO BOX 54153
Los Angeles, CA 90054-0153

From: The League of Women Voters Environmental Action Committee (ENACT)
John D. Sullivan, Chair
1050 N. Mills Avenue
Claremont, CA 91711

G29

Subj: Supplement to the Draft Environmental Impact Report/Statement
(EIR/S) for the Cadiz Groundwater Storage and Dry Year Supply
Program

Date: January 5, 2001

ENACT, which consists of representatives of Leagues in San Bernardino, Riverside, Orange, and Los Angeles Counties, has reviewed the Supplement to the Draft EIR/S and we have the following comments.

G29-1

In most instances, the EIR/EIS adequately addresses the questions and concerns raised regarding groundwater management issues. If properly implemented, the Groundwater Monitoring and Management Plan could ensure the protection of critical resources identified in the plan. The early warning system is essential to preventing or mitigating adverse impacts which may occur as a result of the project.

We hope that the Technical Review Team and a Basin Management Group proposed in the plan provide a mechanism for cooperative problem-solving. The success of the plan's implementation depends on the willingness of the parties involved to work together to resolve issues in the interest of the environment. Furthermore, in order to ensure that the public interest is protected, we suggest that there be a means of informing and involving the public in the decision making process outlined in the plan and that this should be adopted as part of the plan.

G29-2

Although the role of the Bureau of Land Management has not been determined, we agree that its role as a final arbiter and regulator should preclude it from having an active role in the decision making as a means of avoiding conflicts of interest, but that an appropriate role would be as an observer.

We support conjunctive use programs and nonstructural alternatives to water supply sources; however, we have some concerns about several aspects of this project.

G29-3

*WATER QUALITY: The discovery of the presence of Chromium 6 in the indigenous water, and the presence of other contaminants in Colorado River water. What levels of contamination are there and how much will it cost to treat the water?

*POTENTIAL FOR OVERDRAFT: The lack of definitive data on recharge capabilities of the project area also concerns us. We would oppose the transfer of any water out of the basin if it would cause an overdraft of the water in that basin.

G29-4

*HOW MUCH SURPLUS WATER WILL THERE BE? There seems to be a great deal of uncertainty about allocation of Colorado River water in the future. Is there too much risk involved in the assumptions made in the EIR/EIS about how much water will be available for storage?

G29-5

*IMPACTS ON THE DESERT LANDSCAPE AND WILDLIFE HABITAT: The need to build a 35-mile pipeline and above-ground power transmission lines to connect the project area with the Colorado Aqueduct. This is likely to have greater impacts than are indicated in the EIR/EIS. A major concern is the impact of above-ground transmission lines on the desert tortoise, but so is the impact of building the conveyance facility. Will these impacts be addressed by the Basin Management Group?

G29-6

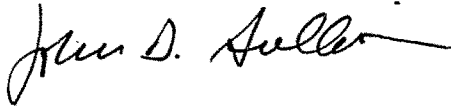
*ALTERNATIVES TO THIS PROJECT: Are there better alternatives? For example, would the other two projects under consideration - the Hayfield/Chuckwalla basin program or the Coachella Valley - be better in terms of fewer impacts as well as achieving the goal of a full Colorado River Aqueduct?

G29-7

We look forward to your responses to these questions. We also want to reiterate our concern for the lack of public participation in the plan. We urge you to take seriously this concern and modify the management process to include public participation.

G29-8

Sincerely,



John D. Sullivan
Chair, ENACT

Phone: 909-607-3072
Email: john_sullivan@pitzer.edu