



MORONGO BASIN CONSERVATION ASSOCIATION

POSTOFFICE BOX 218

TWENTYNINE PALMS, CALIFORNIA 92277

January 5, 2001

Mr. Jack Safely
Project Manager
Metropolitan Water District
P.O. Box 54153
Los Angeles, CA 90054
FAX: 909-697-5299

G31

RE: Cadiz Groundwater Storage and Dry-Year Supply Program

Dear Mr. Safely:

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

G31-1

I. Pilot Program

It is conceded in Section 1.1 that there continues to be substantial and important disagreement among experts regarding the natural recharge to the Project area. As the Project is an as-yet-untested enterprise that would require considerable commitment of environmental resources, we see manifest grounds for instituting a smaller-scale pilot program before initiating the full-scale project so as to obtain further data and gauge environmental effects.

G31-2

II. Groundwater Monitoring and Management Plan ("Plan")

In general, our members support the concept of basing a project on ongoing monitoring of environmental data and effects combined with preventive management, with built-in caps and triggers. However, because of the speculative nature of elements of the Plan, the environmental success of the Project is entirely reliant on the oversight and enforcement provided by the Technical Review Team and the Basin Management Group ("TRT/BMG"). And that is where our main concern lies.

G31-3

In Point VIII of our comments on the Project Draft Environmental Impact Report/Environmental Impact Statement ("Draft"), dated February 18, 2000, we suggested composition for a Plan oversight committee. The make-up of the TRT/BMG as specified in Sections 3.9 and 3.10 of the Supplement does not demonstrate that our suggestions were considered. We continue to endorse our original suggestions for the make-up of the committee as detailed in our Feb. 18 comments.

Mr. Jack Safely
January 5, 2001
Page Two

We especially emphasize the need for environmental representation from the public at large, with consideration for appropriate expertise to the particular issue at hand.

G31-3

Also missing from the Plan is any detail on how the general public will participate in the TRT/BMG process. Will all the meetings of the TRT/BMG be open to the public? When will they be held? Where will they be held? Will the public be able to participate in the meetings directly, or respond in writing? In the interests of maximizing public participation we would advocate that all meetings be open to the public and that the locations of the meetings be rotated throughout affected areas, including the desert communities.

G31-4

Furthermore, again because of the speculative nature of elements of the Plan, public access to the technical data is critical to ensure that the triggers and actions are being noted and pursued appropriately. According to Sections 2.0 and 2.2 of Appendix E in the Supplement, access to project data will be "limited". This is not in the public interest. We advocate that not only should access to those files be available to the public but that the data should be posted on a dedicated, regularly updated (every two weeks) Web site.

G31-5

Finally, throughout the Plan there is an overall lack of commitment expressed through the use of, for example, the words "would" and "may" rather than "will" and "shall". Wherever possible the language needs to be definitive, rather than speculative. We are too often left with the question, what trigger will prompt absolute action?

G31-5

III. Potential Impacts to Indigenous Groundwater Quality

Also in our February 2000 comments on the Draft we expressed concern about monitoring methods to analyze the Colorado River water for future potential constituents, i.e., toxins, radioactivity, etc. We have not found in the Plan that there is an intent to monitor the presence/levels of or publish data regarding any constituents except those currently covered by the statutes named in Section 3.7.2. We would like made regularly available to the public a complete analysis of water composition and constituents and their levels, including and beyond those required by law.

G31-6

IV. Emergency Orders

Are there any circumstances under which the state or another authority could declare some sort of emergency situation that would allow the Plan to be superseded or overridden (e.g., water supplies affected by earthquake, etc.)?

G31-7

Mr. Jack Safely
January 5, 2001
Page Three

V. Concurrent Water Projects

In Section 1.4.3 of the Supplement the Coachella and Hayfield/Chuckwalla projects are mentioned. We are not given any information on control of water entitlement when these two projects are combined with the Cadiz project. The environmental and technical data on the Coachella and Hayfield/Chuckwalla projects need to be made available to the public, and we hereby request that action be taken to provide that data.

631-8

We thank you for your consideration of these comments.

Sincerely,



Christine Carragher

For
D.J. Masker
Director