

January 8, 2001

Metropolitan Water District
Water Resources Management Group
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Attention: Jack Safely, Kathleen Kunysz

Bureau of Land Management
California Desert District
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Attention: James Williams

Comments of Clean Water Action

G36

Re: Supplement to the Draft Environmental Impact Report/ Environmental Impact Statement Cadiz Groundwater Storage and Dry-Year Supply Program San Bernardino County, California

The following brief comments are submitted on behalf of Clean Water Action with regard to the above project. While we share a number of the concerns raised by Desert Citizens Against Pollution, the Sierra Club and others with regard to ecosystem impairments that may result from the project our comments will be limited to water quality and project timing relative to the MWD's water supply master plan process.

G36-1

The overall point of view expressed within the document is that water quality impacts either to the indigenous groundwater or to the water in the Colorado River Aqueduct (CRA) are not significant. The basis for this claim appears to be whether the resulting water quality will still meet state and federal standards. While this is clearly an important benchmark, consumer satisfaction/confidence must also be considered. Does the project have the potential to improve or degrade public health protection vis a vis drinking water quality and at what expense is the real question.

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1. On page 2-24 in section 2.6.9 the water quality in the project area is described only in terms of Total Dissolved Solids and is termed relatively good. This statement while accurate with regard to TDS ignores the presence of arsenic, chromium, nitrates and other constituents of concern in the groundwater basin. These constituents appear to occur at levels that may necessitate treatment and thereby cause the project to incur additional expense.

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2. Section 6.2.1 9 (page 6-2) describes the potential for degradation of the indigenous groundwater by perchlorate and TDS from the CRA, both of which are termed less than significant. It is assumed that both constituents will remain primarily in the area of groundwater mounding and extracted for use outside the area, and that mixing would be minimal. Provisions are made to include these constituents in the monitoring plan and mitigate impacts as they arise. Perchlorate levels in the CRA have reached as high as 9 micrograms per liter. The document makes reference to the state's provisional maximum contaminant level of 18 micrograms per liter. This is not in fact an MCL (provisional or otherwise) but is rather an action level—more research is necessary into health effects before an MCL can be established. Accordingly there is no way to properly gauge the risk of perchlorate contamination. Many communities with perchlorate contamination have opted to close sources rather than expose themselves to unknown but potentially high risks. While MWD's levels

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have not been exceedingly high, they are exploring treatment alternatives. Exposing a new source to contamination seems unwise.

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3. Also in section 6.2.1 on page 6-3 it is stated that little is known about the quality of the deeper aquifer. Given the recent discovery of chromium and the long know presence of arsenic in the shallower basin, it seems at least these constituents and possibly other metals may be present at levels that would be problematic if this water migrated upwards in response to pumping operations.

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4. Section 6.4 (page 6-11) minimizes the significance of potential increases in arsenic and nitrates exposure and fails to mention MTBE and chromium that have been detected. While the attendant levels may be in accordance with Ca standards, most consumers would not be pleased to learn that these constituents were being added to their drinking water. The document makes an assumption that these impacts would be balanced out by the improvements in supply reliability and reductions in TDS.

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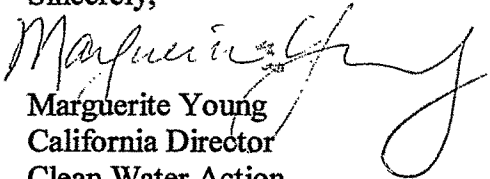
Achieving a water quality objective based on maintaining equivalent public health protection for those who use the water locally and MWD's customers will require investments in treatment for constituents in both sources. This analysis appears to be missing from the document.

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Finally, commitment to this project seems to be out ahead of the MWD's process for determining the best mix of reliability and water quality options for the future. This project may in fact be more expensive than other option still under exploration, and not yield any improvements in water quality. MWD should postpone further commitments to this project until completion of its urban water supply master plan and until it has found answers to the questions regarding water quality and the concerns raised by others with regard to habitat, ecosystem and air quality.

G36-8

Sincerely,



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