



MONO LAKE

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Mr. Jack Safely
Project Manager
Metropolitan Water District
P.O. Box 54153
Los Angeles, CA 90054

Dear Mr. Safely:

On behalf of the Mono Lake Committee, I am submitting the following comments on the Supplemental Draft EIR/EIS for the Cadiz Groundwater Storage and Dry-Year Supply Program.

637-1

The two points I will make focus on timing and opportunity costs associated with moving forward on the Cadiz project at this time.

Timing

In many other programmatic areas, such as conservation, the Metropolitan Water District is delaying any decisions about investing aggressively in a long-term program until after the completion of MWD's Integrated Resources Plan and the contract negotiations with its member agencies. The argument is that MWD will not have a clear enough picture of its needs without moving beyond these two milestones. If that is true, then these criteria should also apply to a 50-year contract.

637-2

I realize that this agreement is not the final contract and that there are still many hurdles over which to leap prior to signing the contract. I note particularly section 11.2 of the agreement that identifies significant reductions in Metropolitan's projected water demands as an example of a "materially changed condition" under which the agreement could be terminated. This appears to recognize that MWD will not know its needs for water and water storage until later, but there is no definition in the contract of "significant."

Opportunity Costs

With any long-term, expensive decision, the MWD makes a choice about where it wants to concentrate the agency's financial resources to best serve its members. In the case of Cadiz, it is not at all clear that this is the best choice for meeting the 4.4 obligation for the Colorado River or for securing "new" supplies to be used in a drought.

637-3

The recent release of the Southern California Comprehensive Water Reclamation and Reuse Study identifies over 21.5 million AF of additional ground water storage available in Southern California, only one million of which comes from the Cadiz Valley. Will MWD's agreement with Cadiz limit its ability to work with its members to develop and contribute financially to increasing members' local storage capacity?

The same study identified 34 regional water reclamation and reuse projects that have begun or are on the drawing board. These projects have the potential to produce about 450,000 AF per year of new recycled water supply. Again, will MWD's agreement with Cadiz limit its ability to work with its members to develop and contribute financially to increasing this new source of supply?

637-4

MWD's 2000 Urban Water Management Plan underscores the untapped potential in increasing conservation projects in the region. The Plan reports only 1,400,000 toilets have been installed in the region, 800,000 of which were installed in Los Angeles. There is tremendous opportunity to expand this program to other member agencies, such as those in fast-growing areas like San Bernardino and Riverside Counties. There is a landscape pilot program showing early signs of success in Orange County, which could significantly reduce landscape water needs. This program needs \$1 million to complete the test phase, and it could be launched region wide within two to three years. Will MWD's financial obligation to Cadiz reduce its commitment to conservation and the low-cost water that conservation frees up for other uses?

637-5

Finally, as the state and the region begin to sort out responses to the energy crisis, there are many city and county agencies that are looking for ways to reduce both energy and water use. The effect of this move could further reduce Southern California's water demand curve. While it is too early to know what will happen, it is clear that MWD could step in and assume some leadership in promoting this trend. But will MWD be trapped into needing to have higher water use because it has made a 50-year agreement with Cadiz?

637-6

These are examples of how a decision now may limit MWD's opportunities to work with its members on a wide range of projects that could greatly reduce the region's need for imported water. The niche for MWD is to be helping its members stay on the cutting edge of water supply and water quality advancements. The MWD should defer its final decision on a contract with Cadiz until late 2002 when MWD knows more about what its members will need over the next fifty years and what are the highest value technical areas in which MWD could serve as a regional resource to its members.

637-7

Sincerely,



Frances Spivy-Weber
Executive Director, Policy