

California Native Plant Society

January 8, 2001

Bureau of Land Management
California Desert District
6221 Box Springs Boulevard
Riverside, CA 92507-0714
Attn: Mr. James Williams

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Metropolitan Water District
Water Resources Management Group
P.O. Box 54153
Los Angeles, CA 90054-0153
Attn: Mr. Jack Safely

RE: Comments on Cadiz Groundwater Storage and Dry-Year Supply Program, Supplement to the Draft Environmental Impact Report, Draft Environmental Impact Statement SCH No. 99021039.

Dear Mr. Williams and Mr. Safely,

The California Native Plant Society (CNPS) is a non-profit organization of more than 10,000 laypersons and professional botanists organized into 32 chapters throughout California. The mission of the California Native Plant Society is to increase the understanding and appreciation of California's native plants and to preserve them in their natural habitat through scientific activities, education, and conservation.

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In that context, CNPS has several comments, that when fully addressed, will significantly improve the document and add to the overall evaluation of the feasibility of the project. The Supplemental EIR/EIS still does not fully examine the potential problems that could result from draining a desert ecosystem of its precious and scarce water supply, and specifically the effect that fluctuation in the water table and quality will have on the plant communities. Some of these plant communities are sensitive to elevated levels of total dissolved solids while others (halophytes) require saline conditions to persist. Many of the halophytic chenopod communities (Desert Iodine Bush Scrub, Greasewood, and others) are considered "rare and worthy of consideration" [under CEQA] communities by the California Department of Fish and Game (NDDDB 2000), and could be impacted through groundwater/TDS fluctuations. No halophytic communities were addressed in the SEIR/EIS (or the DEIR/EIS), despite the fact that their occurrences in the area of influence of this project should be documented and an analysis of impacts should be provided.

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Dedicated to the preservation of California native flora

The Groundwater Monitoring and Management Plan is not adequate to evaluate the potential impacts to the natural water sources. The 28+ existing springs are identified to be monitored once in pre-operational frequency, and then never again. What is the basis for the presumption that monitoring 2 existing springs continuously and 6 other springs semi-annually will provide adequate data to evaluate what's going on at the other 28+ springs? As you know, desert springs are oases for many species including special plant species. CNPS supports a more comprehensive effort to monitor the effect of the project on all the springs, plus more reasonable "Triggers - Action Criteria", and much more specific "Corrective Measures". In Table 3-4, the "Triggers - Action Criteria" for adverse impact to springs allows "measured water level change in excess of 1 ft in any S-series observation wells". A less than one-foot change in water level has the potential to eliminate many of these springs, and cause significant environmental impact. What are the "modifications of project extraction operations" that are proposed to "prevent adverse impacts"? These details are of the utmost importance in preventing adverse impacts and need to be disclosed.

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Furthermore, under this plan, all monitoring and decision-making will be by the project proponents and the County, and the project proponents have built-in incentives to favor continued groundwater extraction. In order to protect the public interest, we request that independent monitoring be done, and that the decision-making process have full representation by the interested public.

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The environmental analysis for this project is still incomplete: An alternative still needs to be included that uses previously disturbed areas and existing energy corridors, that would "1) minimize the number of separate right's of way by utilizing existing rights-of-way... and 2) encourage joint use of corridors for transmission lines, canals, pipelines and cables" as identified in the California Desert Conservation Area Plan as amended (1980). This alternative would use the existing transmission line corridor from the Iron Mountain Pumping Station across Danby dry lake, to Cadiz Road, and then along the All American Pipeline right-of-way or the railroad right-of-way. These right's-of-way are previously disturbed, provide easy access for maintenance and eliminate impacts to undisturbed vegetation communities that would happen in all proposed alternatives. This alternative would prevent further fragmentation of plant communities and the habitat they provide, decrease the spread of exotics and retain the values of undisturbed habitat.

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Another issue that is still not addressed is weed abatement, especially for tamarisk (*Tamarix* sp.). With the creation of inundation basins, we anticipate a likely environment for the establishment of tamarisk. This highly invasive weed whose tiny seeds are dispersed by wind will establish wherever water is available, such as the spreading basins

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proposed in this project. MWD desert facilities currently support catastrophic tamarisk infestations (Copper Mountain reservoir as seen on Huell Howser). Large-scale abatement projects near the proposed project site (Camp Cady, Afton Canyon) are currently funded at taxpayer expense to eradicate tamarisk. A tamarisk abatement program needs to be addressed, established and implemented for all MWD desert projects to minimize the spread of tamarisk in the California deserts. These issues still need to be addressed and publicly disclosed in another environmental impact statement.

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We trust that you will address these comments, and consider them in the context of the overall project feasibility. Please contact me with any questions at (323) 654-5943.

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Sincerely,



Ilene Anderson

Southern California Botanist - CNPS

Renewable Resources Rep. - Desert Advisory Council, BLM



Steve Hartman

Desert Committee, Chair - CNPS

Cc: Emily Roberson, Senior Land Management Analyst, CNPS
David Chipping, Conservation Chair, CNPS
CNPS State Office