

# PEOPLE AGAINST RADIOACTIVE DUMPING

424 "E" Street  
Needles, CA 92363  
760/326-4318

January 8, 2001

Governor Gray Davis  
State Capitol  
Sacramento, California

Mr. Tim Salt, District Manager  
California Desert District, Bureau of Land Management  
United States Department of the Interior  
6221 Box Springs Boulevard  
Riverside, CA 92507-0714  
Attention: Mr. James Williams

CERTIFIED MAIL NO. 7099-3220-0001-1262  
VIA FAX 1 909/697-5299

Ms. Molly Brady, Area Manager  
Needles Field Office  
Spikes Road  
Needles, CA 92363

VIA FAX 1 760/326-7099

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Mr. Stephen N. Arakawa, Manager  
Water Resource Management Group  
Metropolitan Water District - a California Public Agency  
P. O. Box 54153  
Los Angeles, CA 90054-0153  
Attention: Mr. Dirk Reed, Mr. Jack Safely

CERTIFIED MAIL NO. 7099-3220-0001-1255  
VIA FAX 1 213/217-6119

San Bernardino County Supervisors  
County of San Bernardino, Planning Division  
385 N. Arrowhead Ave  
San Bernardino, California 92415-0181

VIA FAX 1 909/387-3223

Re: COMMENTS AND ALLEGATIONS WITH REGARD TO THE PROPOSED "CADIZ GROUNDWATER STORAGE AND DRY-YEAR SUPPLY PROGRAM DRAFT ENVIRONMENTAL IMPACT REPORT DRAFT ENVIRONMENTAL IMPACT STATEMENT SCH. No. 99021039" AKA THE

## "DILUTION OF RADIOACTIVE COLORADO RIVER WATER"

Dear Governor Davis and Supervisor Davis, Mr. Tim Salt, Mr. Stephen N. Arakawa, San Bernardino County Board of Supervisors, and Ms. Brady;

We object to the continued misuse of public funds to process the subject project proposal and application for use of public lands. The EIS/R and Supplement are inadequate and deficient under the National Environmental Policy Act and the California Environmental Quality Act in that the documents fail to adequately address the impact of the proposed project upon the environment down stream on the Colorado River from the proposed delivery system diverting water to the Cadiz Farm and fail to address the impact of injecting water from the Colorado River with relatively high levels of radioactive elements

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into the pristine water aquifer in the Cadiz basin.

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Further, People Against Radioactive Dumping (PARD) objects to the injection of Colorado River water contaminated with radioactive elements into natural and pristine desert aquifers such as the subject Fenner Basin groundwater basin. Public record has shown that the Colorado River is contaminated with radiation from the Atlas Mine, bomb testing fall out, and sewerage discharges from industrial and medical wastes upstream (Las Vegas, Laughlin, Bullhead, Needles). The subject EIS/R is deficient in that it does not provide an analysis of the radioactive elements in water samples taken from the Colorado River, and thus inadequately describes the effect of injecting radioactive elements included in Colorado River water into the groundwater basin at Fenner. Further, not analyzed, is the effect that such radioactive materials injected into the ground water basin at Fenner would have upon existing basin mineral deposits which are being used for beneficial purposes, such as those at the chloride mines around Bristol Lake. Further testing and analysis of Colorado River water samples is needed to determine the total volume and type of radioactive isotopes which are in Colorado River water proposed to be mixed with pristine desert aquifers.

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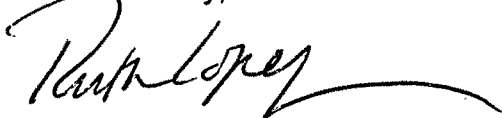
PARD is concerned that the Environmental Protection Agency may not be aware of the subject proposal. Strict EPA regulations prohibit/govern the injection of contaminated water into groundwater basins—is this the reason why the EIS/R never uses the word "injection" but instead refers to the proposed "spreading basins." Whether the mixing is accomplished through "injection" or through "spreading," the spirit of the law and good stewardship is violated when radioactively contaminated water is mixed with pristine desert aquifers in the California Desert Conservation Area.

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PARD represents 25,000 San Bernardino County residents who have signed our petitions to 1) require the responsible management of nuclear materials and 2) rewrite the nuclear waste management laws to reflect an honest classification of what is really being proposed for management, 3) manage nuclear waste according to longevity and level of toxicity/radioactivity—not by who produces/generates it or by where it comes from. In other words, it does not matter who makes it or where it comes from, the waste needs to be classified and managed according to how dangerous it is and how long that danger will last.

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Submitted by,



Ruth Lopez  
Director

People Against Radioactive Dumping  
760/326-4318 or 760/326-2519