

SIERRA CLUB
CAL/NEV REGIONAL CONSERVATION COMMITTEE
BLM LANDS COMMITTEE

230 Larkspur St, Ridgecrest, CA 93555

Bureau of Land Management
California Desert District
6221 Box Springs Blvd.
Riverside, CA 92507-0714
Attn: James Williams
Re: Cadiz Project SEIS

G41

1/4/01

Dear Sir:

G41-1 We are very concerned with the proposed Cadiz water project. First, we find that the authority of the Bureau of Land Management (BLM) to limit or deny water withdrawals which will impact public land administered by BLM is not defined in the Supplemental Environmental Impact Statement (SEIS). As we understand it, the BLM's authority will be defined in meetings not open to the public, and therefore subject to political pressure. We believe that it is both immoral and illegal for a matter of this importance not to be addressed in the SEIS, and to be decided outside of public view and comment. The BLM, acting as our agent to protect our public lands, has the responsibility to protect the Wilderness Areas and other public lands which may be impacted by this project. We have the right to oversee the BLM's stewardship of our land. We have the right and the duty to protect the water that lies under our land. It is ours; it does not belong to the project proponents.

G41-2 Second, all of the monitoring and mitigation is controlled by the project proponents. These proponents have a great incentive to maximize water withdrawals regardless of collateral damage to other resources. Monitoring and mitigation must be controlled by the agencies that administer the public lands that may be impacted, the BLM and the National Park Service. The criteria that will be used to shut this project down before it causes irreversible damage must be spelled out in the SEIS, and the decision left to completely unbiased, objective decision makers (not Cadiz and MUD). A plan similar to that used for the Viceroy Mine project water pumping might be used here.

G41-3 Third, the actual need for the project must be addressed along with alternatives to this project. These alternatives must include water conservation measures and other existing, planned and or feasible water storage projects.

G41-4 Forth, the quality of the water to be injected and the quality of the water in the aquifer must be addressed. The groundwater may contain high levels of chromium 6, and both sources of water may contain high levels of arsenic, radon, MITBE and perchlorates. Does this water need treatment before it is used for domestic purposes, and if so, at what cost? Is this cost economically feasible?

G41-5 Thank you for your attention to these comments. Please keep us informed regarding your decisions in these matters.

Sincerely,

Stan Haye
Stan Haye, Co-Chair

CALIFORNIA DESERT DISTRICT
RIVERSIDE, CA
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