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CADIZ, SOUTHERN DISTRICT
RIVERSIDE, CA.

P31

Mr. James Williams
U.S. Bureau of Reclamations
6221 Box Springs Boulevard
Riverside, CA 92507

Dear Mr. Williams:

I am taking this opportunity to comment on the Supplement to the Draft EIR/S for the Cadiz Groundwater Storage Program. I have a few simple thoughts:

- 1. The groundwater monitoring program will need adequate base-case measurements in order to determine what changes are actually taking place. The system should be installed so that they have at least two years of background information prior to the operation of the project. Failing that, any change in groundwater levels that may or may not be caused by the project could erroneously be deemed to be within normal background variations. P31-1
- 2. Water banking is and will become even a more important part of the water management landscape in California's future. However, water banking does not include the mining of indigenous water, particularly from aquifers that could be easily overdrafted and irreparably damaged because of that overdraft. I believe that there is a very stable water balance in that aquifer as we see it today. P31-2
- 3. The original environmental impact report showed that the first water management step would be to add water to storage. That is the way it should be done. Any effort to mine water in order to develop storage capacity is beyond the scope of the EIR/S and the supplement on which I am commenting. P31-3
- 4. The reaction of the monitoring wells at some distance from the production wells will necessarily lag in time. Appropriate groundwater models can anticipate that lag and project conditions well into the future. That capability should be required if, at any time, the groundwater aquifer is drawn down beyond its present condition. P31-4

Sincerely,

Jeff Blake
Jeffrey Blake

note: no return address on this envelope (post mark was Oakland CA)