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Bureau of Land management
California Desert District
6221 Box Springs Blvd.
Riverside
California, 92507-0714

P44

Attn: Mr. James Williams

Re: Supplement to Draft EIR/EIS for Cadiz Groundwater Storage & Dry-year Supply program

1 January 2001

Dear Mr. Williams:

I am writing with regard to the proposed project and the related EIR/EIS documentation for it.

I am a graduate from the University of California, having majored in geology. After graduation in 1958, I spent three years as a commissioned officer in the US Coast and Geodetic Survey, doing hydrography and oceanography at sea. I have a long interest in the geology of California, particularly the Sierra Nevada range and the Mojave desert. Over the past three decades I have spent a great deal of time exploring the Mojave and doing some mapping in our wonderful desert. I have concluded a two decade-long career at McDonnell Douglas, where I was program engineer on several remote sensing instrumentation programs. Some of these programs were tested in the region under discussion, where ground-truth information was easily obtained by our science teams.

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For some years I have followed the developments regarding the Cadiz operation, most recently the proposed groundwater storage plans with the Metropolitan Water District. I have studied the Draft EIR/EIS, the Supplement to the Draft EIR/EIS, and the USGS "Comment Letter" written by James Devine, dated 23 February 2000. I wish to make some comments that I think pertinent.

I believe that the original concept of the dry-year storage makes considerable sense. The population of Southern California is still expanding, and in spite of excellent achievements in water conservation, the region is facing serious water shortages. Alternate water storage plans involving increased storage in open lakes or increased aqueduct flows seem to me to involve huge evaporation losses, losses that any conservationist must consider with horror. What better way to deal with this situation than by underground temporary storage during water-rich years?

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I realize there is a controversy regarding the proposed program and the EIR/EIS documentation submitted for evaluation. Some of this seems politically motivated to me. I have reviewed the technical documentation for the proposed project and I have visited the site several times over the years. Much of the controversy seems spurious to me. I am impressed by the volume of data acquired for the project and with the analysis of those data by the various project consultants. To the best of my knowledge, the "Groundwater Monitoring & Management Plan is unique in proposing state-of-the-art technology for providing advanced warning of potential environmental impacts long before any impacts would be significant, thereby allowing implementation of appropriate mitigation measures.

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I worry that major decisions are being made on this project that are not based on adequate science. I am very concerned about the USGS "Comment Letter" of 23 February 2000. I am particularly concerned that the comments by Devine are to be taken seriously. It seems to me he presents no data that are *specific* to the Cadiz location, but relies upon studies done elsewhere. How can we draw conclusions from them? I see little in the way of documentation regarding analytical methods used to reach conclusions about the Cadiz site. I have to tell you that I am even more suspicious of these Comments because I know nothing of the author's credentials. *Is* he a geologist or hydrologist? Does he have a bibliography of his own publications that concern the issues involved here? I see none.

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This USGS "Comment Letter" appears to me to have brought a long delay in implementation of this interesting project.

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If documents with spurious information or lack of good hard science can have such an impact, I must assume that they are politically motivated.

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Good science is mandatory for the decisions before us. If good science is not presented, I have to ask myself what the goals are of those who fail to live up to the responsibility of good science?

I hope you will consider these and other statements with an especially critical eye and an open mind. A great deal depends upon it.

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Sincerely,

Will Connell
Will Connell

cc: Secretary, Dept. of Interior