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616 Lido Drive
Boulder City, NV 89005
January 4, 2001

U.S. Bureau of Land Management
6221 Box Springs Blvd.
Riverside, CA 92507

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Attn: Mr. James Williams

Subject: Supplement to Draft EIR/EIS for Cadiz
Groundwater Storage & Dry-Year Supply Program

Dear Mr. Williams:

This letter is written to comment on several different aspects of the subject document and the program to which it pertains.

First, I would like to state that I believe the Cadiz Program is an innovative and environmentally responsible solution for significant problems of water-supply availability, conservation and management. These problems are endemic to all of the southwestern United States, and I hope that the Cadiz Program will serve as a guide for other conjunctive use programs throughout the region. Further, the proposed Groundwater Monitoring and Management Plan is, to the best of my knowledge, unique in its scope and consistent with the highest goals of natural resource management and protection. It too can serve as a valuable guide for groundwater monitoring and management, not only in the arid West, but also wherever groundwater depletion or pollution poses significant risks.

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Secondly, I would like to state that I have reviewed the two-volume "Environmental Planning Technical Report - Groundwater Resources" (Report no. 1163) that was prepared for MWD and the BLM by Geoscience Support Services, Inc. I have also visited the site of the proposed Cadiz Program and observed the spreading basin test and the production and observation wells used in the collection of site-specific data employed in the analyses presented in the Technical

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Report. The presentation of these data and the clear discussion of analytical methods employed in interpretation of these data are hallmarks of good science and professionalism. I know of no other hydrological studies of comparable depth and detail anywhere else in the desert regions of eastern California.

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Thirdly, I would like to state that I have reviewed the so-called "comment letter" submitted by the U.S. Geological Survey (James F. Devine, February 2000)¹ in response to the Draft EIR/EIS for the Cadiz Program. I have worked professionally in government science for more than 40 years and have never encountered a document of comparable arrogance and vituperation. This document is totally lacking in site-specific data and any documentation for the analytical methods allegedly employed in reaching its dubious conclusions. It is not science. It is a screed of unsupported accusations.

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In my search of the U.S. Geological Survey web sites I have learned that Mr. Devine is not a hydrologist, and that his record of publication has no relevance to the issues addressed in the "comment letter".² Upon further inquiry, I have learned that Mr. Devine is not actually the author of this document, and that the identities of the actual authors, and their qualifications, has not been publicly disclosed. This "Star Chamber" approach to government science - to any science - is unacceptable.³

Upon further search of the U.S. Geological Survey web sites I found a formal statement of policies and professional practices, many of which are clearly violated by the "comment letter".⁴ Among these violated policies and professional practices are the following:

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¹ Devine, James F., Feb 23, 2000, Review of the Cadiz Groundwater Storage and Dry-Year Supply Program Draft Environmental Planning Technical Report, Groundwater Resources, Volumes I and II: Memorandum to Molly S. Brady, Field Manager, Bureau of Land Management, Needles, California.

² A listing of Mr. Devine's professional publications may be found at: <http://search.usgs.gov/query.html>

³ The 17th century English tribunal and inquisition notorious for its secret deliberation and arbitrary judgements.

⁴ The U.S. Geological Survey Manual may be found at: <http://www.usgs.gov/usgs-manual/>

The results of USGS investigations are made available in an impartial manner that will best service all the public, rather than the interests of any special group or individual. Approval by the Director is the final step in the processing of a report before it is released for production and publication either in a USGS series or in an outside format. The objectives of Director's review are to provide the final check on the technical integrity of the report, to ensure that all the appropriate processing steps have been followed, that USGS publications standards have been maintained, and that the report is consistent with USGS and Department policies and positions. (500.9-3)

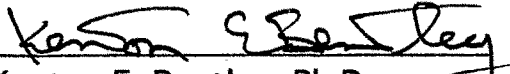
- A. Integrity. The data collected are accurate and precise and the methods of collection are documented. The interpretations are presented as honestly and straightforwardly as possible, without apparent bias. The tone of the report is reasonable; derogatory remarks of a personal nature are avoided... (500.9-5)*
- B. Objectivity. The conclusions are based on accurate data interpreted with sound scientific reasoning. Department and USGS policies and positions are not compromised or deliberately contradicted. (500.9-5)*
- C. Impartiality and Nonadvocacy. The report presents facts and interpretations impartially for others to use for their own purposes. Alternatives are evaluated rather than solutions recommended. Advocacy positions are avoided; so are preaching and lecturing. There is no implied adverse criticism of other agencies, State or Federal, or of the private sector. (500.9-5)*
- D. Public Benefit. Information in the report has broad applicability to the user community rather than favoring a restricted sector. The study does not imply competition with the private sector, nor do the results favor a special private entity. (500.9-5)*

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I hereby request that the United States Department of the Interior reconcile the document signed by James F. Devine with the stated policies of the U.S. Geological Survey.

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Respectfully,


Kenton E. Bentley, Ph.D.

cc: Secretary
U.S. Department of the Interior
1849 "C" Street, NW
Washington, D.C. 20240