

John E. Hiatt
8180 Placid Street,
Las Vegas, NV 89123

January 6, 2001

Mr. James Williams
Bureau of Land Management
6221 Box springs Blvd.
Riverside, CA 92507

P71

Re: Cadiz Groundwater and Dry-Year Supply Program Draft DEIS and Supplement

Dear Sirs:

The DEIS and the Supplement to the DEIS both fail to seriously address the major issue involved with large scale water withdrawal from the Cadiz-Fenner aquifer system. Namely, what is the perennial yield of the aquifer and what will be the result of pumping in excess of the average annual recharge?

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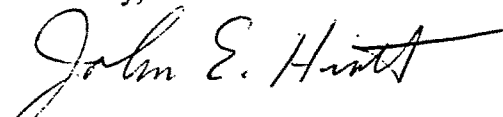
The Supplement to the DEIS is a plan of operations but nowhere but nowhere does it state that water withdrawal will be reduced or curtailed if higher elevation in the basins go dry. Previous history would suggest that the monitoring program will document declining water tables and adverse impacts but demand for water by the Metropolitan Water District (MWD) will override concerns for wildlife and the desert ecosystem. The financial investment in wells, pumps and pipe will be so large that the political pressure to "make good" on the investment will outweigh all other concerns. The Mono Lake and Owens Valley projects are prime examples of how arid land water resources have been overexploited for the benefit of the urban population of Coastal California. The only avenue for relief in the above cases has come as a result of long and protracted battles in the courts.

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At a minimum the DEIS and its' Supplement should address the very different estimates of the average annual recharge in the Cadiz-Fenner aquifer made by the U.S.G.S. and the project proponents. When recharge estimates differ by a factor of ten it is absolutely imperative that the issue of recharge be thoroughly explored and resolved prior to issuing permits and constructing infrastructure. Once hardware is in place and pumping starts no politician or bureaucrat will have the fortitude to admit that a mistake has been made and shut-off the pumps and abandon the \$50-100 million dollars that have been invested. The issue of perennial yield must be resolved prior to any permits being issued.

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Sincerely,


John E. Hiatt

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