

Bureau of Land Management
California Desert District
6221 Box Springs Boulevard
Riverside, CA 92507-0714

December 22, 2000

P106

Attn: Mr. James Williams

P106-1

These are my concerns regarding the SEIS and Cadiz, Inc., the agricultural company in the California desert that proposes to drain up to 652 billion gallons from an ancient aquifer that underlies the Mojave National Preserve and five Bureau of Land Management wilderness areas.

P106-2

* The SEIS does not fully examine the potential problems that could result from draining a fragile desert ecosystem of its precious and scarce water supply. This is SERIOUS, should not be taken lightly, nor should economic or political pressures drive such a process.

P106-3

* The SEIS does not contain complete information on the water quality of the groundwater or the Colorado River water that would be imported to this aquifer. This is troubling, given the recent discovery of extraordinarily high levels of chromium 6 in the groundwater and the likelihood that one or both of these water sources contain arsenic, radon, MTBE and perchlorates (rocket fuel). This water will be very expensive to treat, likely at the expense of taxpayers and/or water customers in southern California.

P106-4

* This project could endanger the unique and rare plants and animals of this desert community, including the threatened desert tortoise and desert bighorn sheep.

P106-5

* The "monitoring and mitigation" plan is ill-defined and offers questionable management for environmental impacts. Under this plan, all monitoring and decision-making will be dominated by Cadiz, Inc., and its customer, Metropolitan Water District, both of which have built-in incentives to favor continued groundwater extraction. This puts profit-focused decision makers in charge of the protection of our public resources. This does not protect the public interest.

P106-6

* The environmental analysis for this project is still incomplete. There is a plan for monitoring, but not a plan for management of environmental problems. There is also no information on how water quality problems will be addressed. The Bureau of Land Management's authority is not defined in the latest environmental report and instead will be defined in closed-door negotiations. All of these issues need to be addressed and publicly disclosed in another environmental impact statement.

P106-7

* The document needs to examine alternatives that are actually sustainable, safer, and less environmentally destructive, including water conservation measures. The review of such viable alternatives is a requirement under both state and federal law. Alternatives that should be considered include other existing, planned or feasible water storage projects and a host of easily adopted water conservation measures that have successfully reduced water demand in other areas.

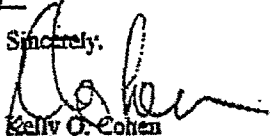
P106-8

* The public lands that could be impacted by this project include two national parks and five wilderness areas managed by the Bureau of Land Management. These lands were set aside by Congress to be permanently protected for their nationally significant natural and cultural resource values. This project is likely to undo that protection for future generations.

P106-9

Please, I behoove you to consider these comments and take seriously the long-lasting repercussions of such actions.

Sincerely,



Kelly O. Cohen
P.O. Box 676
Rim Forest, CA 92378