



California Regional Water Quality Control Board

Colorado River Basin Region



Winston H. Hickox
Secretary for
Environmental
Protection

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Gray Davis
Governor

December 5, 2000

S11

Jack Safely
Metropolitan Water District of Southern California
P.O. Box 54153
Los Angeles, CA 90054-0153

RE: RESPONSE TO "SUPPLEMENT TO THE DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT CADIZ GROUNDWATER STORAGE AND DRY-YEAR SUPPLY PROGRAM, SAN BERNARDINO COUNTY, CALIFORNIA"

The Supplement to the Environmental Impact Report/Environmental Impact Statement, Cadiz Groundwater Storage and Dry-Year Supply Program, San Bernardino County, California, prepared jointly by the Metropolitan Water District of Southern California (Metropolitan) and the U.S. Department of Interior, Bureau of Land Management (BLM), was received on October 20, 2000, and was reviewed by Regional Water Quality Control Board (Regional Board) staff.

The proposed action will use and store approximately 15,000 acre-feet of imported Colorado River water per year. It will also provide a total storage of approximately one million acre-feet of water. Storage water would be conveyed from Metropolitan's Colorado River Aqueduct (CRA) to the basins during surplus years (or seasons) and will be used during dry years. The project proposes to transfer the stored indigenous groundwater to the CRA through extraction and delivery.

S11-1

Regional Board reiterates the comments on the draft EIR/EIS contained in a letter dated February 22, 2000 (copy is enclosed).

If you have any questions regarding this matter, please call me at (760) 776-8986.

KOLA OLATUNBOSUN
Sanitary Engineering Associate

KO/gr

Enc.: As stated above

cc: State Clearinghouse, Sacramento

File: ER SB ED



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February 22, 2000

ATTN: Mr. Dirk Reed
 Metropolitan Water District
 Water Resource Management Group
 P.O. Box 54153
 Los Angeles, CA 90054

ATTN: Mr. James Williams
 Bureau of Land Management
 California Desert District
 6221 Box Springs Blvd.
 Riverside, CA 92507-0714

Dear Messrs. Reed and Williams:

SUBJECT: SCH NO. 99021039 CADIZ GROUNDWATER STORAGE AND DRY-YEAR SUPPLY PROGRAM DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT

Thank you for the opportunity to comment on the subject document.

Regarding the proposed project, we are primarily concerned about the overall water quality impact that may result from recharging an aquifer of high water quality with water of lesser quality. This includes maintaining the drinking water standards for all constituents. Also, we are concerned about salts and perchlorate that are present in the source water, as addressed in the EIS/EIR. The presence of MTBE would be an additional concern since it does not readily degrade when introduced to groundwater.

511-1

Our first comment is in regards to the following statement (page 5-95),

"No Colorado River water is anticipated to migrate to the Bristol or Cadiz dry lakes during the Cadiz project. As a hypothetical scenario, however, because Colorado River water contains more sodium and calcium than the indigenous groundwater, any Colorado River water that migrated to the dry lakes and evaporated would contribute even more sodium and calcium to these dry lakes for the production of calcium chloride and sodium chloride. The availability of chloride in the brine underlying the dry lakes would facilitate production of these compounds, and be beneficial."

It is unclear why increased production of calcium chloride and sodium chloride would be beneficial to the Bristol or Cadiz dry lake systems.

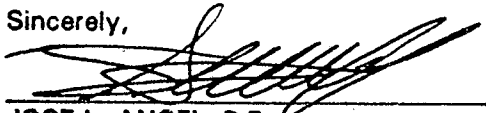
Further, we believe the EIS/EIR should address the likelihood that the proposed project has for increasing the hydraulic continuity/connectivity between the Cadiz aquifer and the saline aquifers underlying the Bristol and Fenner dry lakes; and the potential for an increase in salinity in the Cadiz Aquifer should hydraulic continuity be an issue.

February 22, 2000

Please contact Summer Bundy at (760) 776-8937 should you have any questions regarding these comments.

S11-1

Sincerely,



JOSE L. ANGEL, P.E.
Chief of Basin Planning

JLA:sb

CC: State Clearinghouse

File: ER WDA