CADIZ GROUNDWATER STORAGE & DRY-YEAR SUPPLY PROGRAM

COMMENT CARD

PLEASE PRINT

Do you want to speak?

☐ Yes ☒ No ☐ Did not attend meeting

Name John Smith

Address

City, State, Zip 29 Palms

Phone No. (optional)

Organization (if applicable)

Comments Why is the life of the project so short term. And what source will replenish when there will be a likelihood of an ever greater need for water from MWD.

T4-1

Thank you. Please return this card or call Jack Safely, Metropolitan Water District, at 213-217-6981, or James Williams, Bureau of Land Management, at 909-697-5390 by January 8, 2001.

CADIZ GROUNDWATER STORAGE & DRY-YEAR SUPPLY PROGRAM

COMMENT CARD

PLEASE PRINT

Do you want to speak?

☐ Yes ☒ No ☐ Did not attend meeting

Name Robert BORDSCEN

Address 42286 Monterra Cir

City, State, Zip Palm Desert CA 92260

Phone No. (optional) 1-760-773-4720

Organization (if applicable) LEE CHEMICAL INC

Comments What do the shut down procedure in event of excess Fluoride drawn & Chromo #6

T4-2

Thank you. Please return this card or call Jack Safely, Metropolitan Water District, at 213-217-6981, or James Williams, Bureau of Land Management, at 909-697-5390 by January 8, 2001.

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COMMENT CARD

PLEASE PRINT

Do you want to speak?

☒ Yes ☐ No ☐ Did not attend meeting

Name D J MASKEA

Address PO Box 3879

City, State, Zip 29 Palms CA 92278

Phone No. (optional)

Organization (if applicable)

Comments TRT EIR/EIS COMPOSITION

"A" "J" "V"

Public Comments in the Supplemental

II

T4-3

Thank you. Please return this card or call Jack Safely, Metropolitan Water District, at 213-217-6981, or James Williams, Bureau of Land Management, at 909-697-5390 by January 8, 2001.

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COMMENT CARD

PLEASE PRINT

Do you want to speak?
☒ Yes ☐ No ☐ Did not attend meeting

Name M. J. "MAC" DUBE
Address CITY HALL (COUNCIL MEMBER)
City, State, Zip 29 PALMS, CA. 92277
Phone No. (optional) (760) 367-6799
Organization (if applicable) MAYOR PRO-TEM

T4-4 Comments (1) QUESTION IN RE LOCAL PARTNERSHIPS

T4-5 (2) LOWERING OF CHROM 6 STDS IN FUTURE?

T4-6 (3) GUARANTEES OF AQUIFER STABILITY - i.e. NO OVERDRAFT — 1 MIL IN = 1 MIL OUT!

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CADIZ GROUNDWATER STORAGE & DRY-YEAR SUPPLY PROGRAM
COMMENT CARD

PLEASE PRINT

Do you want to speak?
☒ Yes ☐ No ☐ Did not attend meeting

Name Peter Kiriakos
Address 29421 Sionharbor Court
City, State, Zip Lake Elsinore CA 92530
Phone No. (optional) (909) 245-2304
Organization (if applicable) Sierra Club - San Gorgonio Chapter

T4-7 Comments We are totally opposed as an organization

Thank you. Please return this card or call Jack Safely, Metropolitan Water District, at 213-217-6981, or James Williams, Bureau of Land Management, at 909-697-5390 by January 8, 2001.

COMMENTS BY
THE ASSOCIATION OF CALIFORNIA WATER AGENCIES
ON THE
SUPPLEMENT TO THE DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT
FOR THE
PROPOSED CADIZ GROUNDWATER STORAGE AND DRY-YEAR SUPPLY PROGRAM

My name is Krista Clark and I am with the Association of California Water Agencies or ACWA. ACWA appreciates the opportunity to submit comments on the Supplement to the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Proposed Cadiz Groundwater Storage and Dry-Year Supply Program. ACWA consists of over 440 public water agencies in California. Our members serve nearly 90% of the delivered water in California for residential, industrial and agricultural uses. T4-8

Two of ACWA's goals are to promote the use of good science in water management decisions and to provide the public and policy leaders with the most accurate information about the quality of California's drinking water. It is in this capacity that I present these comments today. ACWA would like to take this opportunity to provide the lead agencies with current information on the subject of chromium VI and also to briefly comment on the groundwater monitoring and management plan proposed for this project.

CHROMIUM

There has been a significant amount of media attention shown to the discovery of chromium VI in the proposed project area and in Southern California drinking water supplies. Although this media attention has been limited mostly to Southern California, testing of groundwater wells has discovered chromium VI in Northern and Central California supplies as well. These findings are not altogether surprising considering that chromium is the 11th most common element in the earth's crust. In fact, chromium is more commonly found in soils than mercury, zinc, or uranium.

That said, the concern that has been expressed by the public, media, and policy leaders over chromium VI is valid. Chromium VI is a known carcinogen when inhaled and the

perception of any potentially cancer-causing element in our water supplies is naturally disturbing. It is this perception of risk, coupled with some misleading assumptions and reporting, that we would like to address today. We do not appear here today as opponents or proponents of this project. The future of this project is a decision appropriately made by the lead agencies, qualified engineers and local stakeholders. However, we are here today to reinforce that this project should not be decided based on the presence or absence of chromium VI. Despite the implication in recent media reports that chromium VI may be a deciding factor for this project, the truth is that chromium VI is a statewide issue, not a local issue, and its potential impacts will be felt by water suppliers everywhere.

T4-8

The California Department of Health Services and California's water suppliers concern themselves first and foremost with the protection of public health and are deliberately working to understand the full impact of this contaminant. Active sampling of water supplies throughout the state is underway and the results of this sampling will assist all involved parties in taking appropriate and immediate action.

But this sampling is just one part of the process established by the state legislature for the setting of new drinking water standards. Several other considerations must be taken into account during this process such as health risks, treatment options, treatment costs, and laboratory capability. Unfortunately, at this time the health risks are highly debatable, treatment options and costs are still unknown and there are no labs currently certified to perform the correct analysis. In order to provide the lead agencies with the most current information available on chromium VI, I would like to provide a bit more detail on each of these components.

Health Effects

Rightfully of highest priority is the evaluation of the health effects of chromium VI. As mentioned earlier, when inhaled, certain forms of chromium VI are known to cause cancer. However, what is currently being debated in scientific circles is whether or not chromium VI in drinking water can also cause cancer by ingestion. Scientific experts at the state Office of Environmental Health Hazard Assessment last year came to the conclusion that chromium VI in drinking water can cause cancer. And yet, scientists at the U.S. Environmental Protection Agency (EPA) and the World Health Organization, upon evaluating the exact same studies, concluded there is currently no evidence that chromium VI in drinking water causes cancer. In fact, EPA actually raised its total chromium standard based on review of these studies. The

EPA's conclusion about chromium is similar to the health conclusions drawn for asbestos; it is a carcinogen when inhaled but not when ingested.

It is not our intention here today to determine which of these experts is right or wrong. Merely, it is our intent to point out that major health discrepancies exist which must be resolved immediately. While it may be easy to justify an immediate standard based on the "better safe than sorry" principle, it is important to remember that any action will come with a price tag. The additional cost to treat chromium VI, especially if the chromium is naturally occurring, will likely be substantial and will be passed on to water ratepayers. In order to continue providing affordable water to all consumers, it is our responsibility to ensure that every treatment facility constructed and paid for by consumers is providing healthful benefits and not simply alleviating "perceived" threats.

T4-8

Treatment

Of course, in order to construct treatment facilities, a mode of treatment must be determined. This is another step in the standard setting process developed by the legislature and employed by the Department of Health Services. It does absolutely no good to set a standard for a contaminant when there is no way of removing it from the water supply to that level. Although there are likely treatment options available that will effectively remove chromium, there is currently no such system in place in California.

Despite media reports that any such treatment will cost anywhere from $50 an acre foot to $500 an acre foot, these figures are obviously just speculation. There is currently no way to know how much treatment will cost without any determination of effective treatment options. ACWA, its member agencies, and the Department of Health Services are all actively investigating an appropriate treatment method and the associated costs if it is determined that chromium levels should be reduced. This process is underway but will likely take at least three to six months to complete the proper engineering estimates.

Lastly, the Department of Health Services has begun the process of certifying laboratories for chromium VI drinking water analysis. Although a few laboratories are currently performing chromium VI analysis, the techniques used for this analysis are complex and expensive. The quality of the data and the capability of the labs to handle the volume of samples needing analysis will need to be resolved prior to the adoption of any drinking water standard. As mentioned, this process is underway and several labs should be certified in the near future.

Standard Setting

I would also like to take a moment to clarify the "proposed standards" that are frequently referred to in the press and provide a bit of history on the current standards for chromium and the processes used to set them.

In 1991, U.S. EPA performed a review of its current total chromium standard, which at the time was 50 ppb. Based on the health effects data mentioned earlier, EPA decided to raise its chromium drinking water standard from 50 ppb to 100 ppb, the first and only time EPA has raised a drinking water standard. California has long maintained the more restrictive standard of 50 ppb. T4-8

In 1999, OEHHA adopted the public health goal or PHG for total chromium at 2.5 ppb. The PHG is a health risk assessment, not unlike those done routinely for other environmental regulations. The PHG is defined as the level below which no adverse health effects will occur over a lifetime of exposure. In essence, this is the zero risk number. OEHHA developed the PHG for total chromium by determining the zero risk numbers for chromium VI and chromium III and essentially adding them together. The zero risk number for chromium VI was found to be 0.2 ppb.

I want to reinforce here that the PHG is NOT a proposed standard. Although the PHG is a very important part of the standard setting process, it is only ONE part of the process and the ultimate standard may not equal the PHG once technology and costs are considered.

I also want to clarify that, despite reports to the contrary, OEHHA did not develop the PHG because of any specific concerns about chromium or chromium VI at the time. The PHG was developed in accordance with legislation passed in 1996 that required PHG development for ALL 84 drinking water standards. OEHHA was given three years to complete all the PHGs in groups of 25, starting in 1997 and ending in 1999. The PHG for chromium was among the second set of PHGs developed, which occurred in 1998. On a side note, this process proved far too burdensome for OEHHA to complete on time and thus the legislature has granted it additional time to complete the PHGs yet to be developed.

As evidenced here, there is much we know about chromium VI and still much we don't know about this element. Fortunately, the legislature has recognized that evaluating drinking water contaminants and resultant actions is complex business. That is why it enacted a thorough process to determine risks and implement precautions. The legislature has acknowledged that a

standard truly protective of public health must be thoroughly understood and possible to achieve both technically and financially. Any rush to set a standard due to perceived threats could greatly strain public resources, while providing little true benefit to public health.

T4-8

CADIZ MONITORING PROGRAM

I now briefly want to comment on the primary subject of today's hearing which is the groundwater monitoring plan proposed for the Cadiz project. This monitoring program is one of the most, if not the most, comprehensive plan ever designed for a groundwater storage project in California. Understandably, this program is designed to protect vital groundwater resources, surface water resources, and eliminate any potential related air quality problems. The degree of detailed and thorough oversight that this program will provide is impressive and the project's proponents should be applauded.

T4-9

That said, this project is being watched closely by water managers and regulators throughout the state due to its potentially precedent-setting nature. As the lead agencies are surely aware, CALFED has identified groundwater banking and conjunctive use projects as vital to ensuring the future water needs of California. Several projects have already begun operation and many more are targeted for investigation. We realize that there are sensitivities in this region that distinguish it from other targeted banking areas, and yet we also become concerned about the potential to require the level of monitoring envisioned for the Cadiz project on a statewide basis.

This sort of state-of-the-art monitoring program will be very expensive to construct and operate. A monitoring plan this comprehensive, applied to every conjunctive use project in the state, would likely price many of those projects out of feasibility. While this level of oversight is admirable in this case, it is possibly unnecessary for many groundwater banking projects in other locations. We simply want to reinforce that the extraordinary circumstances involved with this project may warrant extra caution but that this project should in no way define a new standard for conjunctive use monitoring. We feel it's important that all involved parties know that the rest of the state is watching the development of this project and specifically this monitoring program.

We appreciate the opportunity to submit these comments and are open to answering any questions on these subject matters. Thank you.

Lawrence Livermore National Laboratory

December 14, 2000

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

Dear Sir,

Recharge estimates in desert groundwater basins often generate intensive discussion and occasional disagreement. Much of this appears to be due to the misconception that visibly dry landscapes are the result of negligible recharge of annual precipitation. However, in the past 20 years many groundwater recharge studies in arid and semi-arid environments have shown that a significant portion of annual precipitation recharges deep into groundwater aquifers. Among these are studies by Stephens and Knowlton (1986), Barnes et al. (1994), Stephens (1994), Gee et al. (1994), and Davisson et al. (1999), who have shown that desert recharge occurs by diffuse infiltration of sustained rainfall, concentrated pulses from melting snow packs, and focussed recharge through sandy-bottom washes. The results are undeniable and have been validated for several desert environments where measurements were made.

T4-10

The recent hydrogeological assessment by Geoscience Support Services Inc. for the Cadiz Groundwater Storage and Dry-Year Supply Program Draft EIR estimated recharge rates to the Bristol, Cadiz, and Fenner basins. Their rates were consistent with recharge rates measured for similar basins in the above cited references. The Geoscience estimates show no evidence for being unreasonably high, and their results using several independent approaches were based on sound scientific methodologies.

For the past one and a half years, I have been making observations on groundwater in the Fenner basin. My independent recharge assessment using isotopic analysis on collected groundwater and Maxey-Eakin estimates, yield similar results to Geoscience. In particular, my observations of groundwater tritium occurrence imply that a significant quantity of groundwater annually recharges in the New York and Providence Mountains. Furthermore, two independent groundwater age determinations in the Fenner Gap, using methods of helium-4 accumulation and radiocarbon of dissolved *organic* carbon, show consistently young ages for this groundwater. My data suggests that groundwater age determinations using radiocarbon of *inorganic* carbon or by the chloride mass balance approach as proposed by others yield erroneously old ages, which subsequently underestimate recharge.

The groundwater monitoring plan outlined in the Draft Supplement to the EIR appears to be designed to effectively detect potential impacts to the Fenner groundwater basin during operation of the Cadiz Groundwater Storage and Dry Year Supply Program.

Given the convincing evidence that recharge rates to the Fenner basin are adequate to support the storage and supply project goals, and that the monitoring plan is thorough in its design, any concerns raised for potential, irreversible damage to the Fenner Basin water supplies at this point in time would appear to be unfounded.

T4-10

Sincerely,

M. Lee Davisson

Group Leader
Environmental Chemistry and Toxicology
Lawrence Livermore National Laboratory

Cc: Dennis Williams
Mark Liggett

References

Barnes, C.J., Jacobson, G., Smith, G.D., 1994, The distributed recharge mechanism in the Australian arid zone. *Soil Sci. Soc. Am. J.*, 58, 31-40.

Davisson, M.L., Smith, D.K., Kenealley, J., Rose, T.P., 1999, Isotope hydrology of southern Nevada groundwater: stable isotopes and radiocarbon. *Water Resour. Res.* 35, 279-294.

Gee, G.W., Wierenga, P.J., Andraski, B.J., and others, 1994, Variations in water balance and recharge potential at three western desert sites. *Soil Sci. Soc. Am. J.*, 58, 63-72.

Stephens, D.B., 1994, A perspective on diffuse natural recharge mechanisms in areas of low precipitation. *Soil Sci. Soc. Am. J.*, 58, 40-48.

Stephens, D.B. and Knowlton, R., 1986, Soil water movement and recharge through sand at a semiarid site in New Mexico. *Water Resour. Res.*, 22, 881-889.

COMMENTS BY
THE ASSOCIATION OF CALIFORNIA WATER AGENCIES
ON THE
SUPPLEMENT TO THE DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT
FOR THE
PROPOSED CADIZ GROUNDWATER STORAGE AND DRY-YEAR SUPPLY PROGRAM

My name is Melinda Rho and I am representing the Association of California Water Agencies or ACWA. ACWA appreciates the opportunity to submit comments on the Supplement to the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Proposed Cadiz Groundwater Storage and Dry-Year Supply Program. ACWA consists of over 440 public water agencies in California. Our members serve nearly 90% of the delivered water in California for residential, industrial and agricultural uses. T4-11

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We appreciate the opportunity to submit these comments~~, and are open to answering any questions on these subject matters.~~ Thank you.

Metropolitan Water District
700 N Alameda Street
Los Angeles, California

Monday, December 18, 2000
Public Meeting Record

This letter is in support of the proposed Cadiz ground water storage project. The concept of storing supplemental water for use in critical times is a wise management decision for all of Southern California. The underground storage concept would have an innocuous impact on the desert environment. There would be no adverse impacts to our desert area.

As the closest incorporated community to the Cadiz Basin area we are always greatly interested in any proposal that may impact our city. The careful and far-sighted management of water resources is a goal we encourage. All communities in Southern California currently mine ground water for their quality of life. Storing additional resources should be supported.

T4-12

Every issue in the California Desert appears to attract opposition from urban-based political organizations that feel they have a mandate to dictate policies to the desert areas. These outside political organizations with perpetual obstructionist agendas would spend their time better proposing conservation measures in their own metropolitan areas.

No credible scientific argument for opposition to the proposal by Metropolitan Water District for their dry year storage supply program has come forward. The project remains a desirable wise resource management mechanism. This project should become a reality to help serve the needs of Southern California.

Jim Bagley, Council-member