



United States Department of the Interior



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In Reply Refer To:
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The Honorable Dianne Feinstein
 United States Senate
 331 Senate Hart Office Building
 Washington, D.C. 20510

Dear Senator Feinstein:

As requested by the Department of the Interior, I am pleased to respond to your specific questions in your October 30, 2001, letter regarding the proposed Cadiz Groundwater Storage and Dry-Year Supply Program. The answers to these questions, like our responses to your August 1 letter, have been prepared in cooperation with National Park Service (NPS) Regional Director John Reynolds, U.S. Geological Survey (USGS) California District Chief Mike Shulters, County of San Bernardino Assistant County Administrator John Goss, and Metropolitan Water District's Chief Executive Officer Ron Gastelum.

The following responses are provided to the answers posed in your letter:

Question 1: "It was not clear to me how much native groundwater the proponents of this project seek to take out over the 50-year life of the project. The Final EIS does not seem to indicate the target or projected quantity of native groundwater to be extracted. Can the BLM and the general public determine whether the project will make economic sense and the likelihood of environmental impacts without this information?"

Answer: The draft environmental impact statement (EIS) and environmental impact report (EIR) stated that the transfer of up to two million acre-feet of indigenous groundwater over the 50-year project life could occur, and evaluated potential impacts to the environment based on modeling using this assumption. The public review of the draft EIS/EIR revealed that there was disagreement in the scientific community over the amount of groundwater that could be transferred under the proposed program. Therefore, the BLM, cooperating Federal agencies, and the County of San Bernardino prepared a comprehensive Groundwater Monitoring and Management Plan (which is included in the Final EIS/EIR) that provides for protection of critical environmental resources and circulated it for public review. Potential impacts to the environment were evaluated assuming implementation of the

management plan and the restrictions that are placed on water extraction from the groundwater basin by the plan. The Final EIS/EIR states that the amount of groundwater that could be transferred from the groundwater basin would be determined through implementation of the management plan. We believe the management plan will provide us the necessary means to assess and monitor the project's impacts and take corrective actions before any adverse impacts to critical Federal resources are likely to occur. If all corrective actions have been taken, and adverse impacts are still determined likely to occur, BLM would have the authority to limit the project solely to conjunctive use (i.e., Colorado River water storage and retrieval). As for whether the project will make economic sense under this plan, Metropolitan and its board of directors have the public responsibility of making that determination.

Question 2: "What are the proposed mitigation measures for the project's potential environmental impact? Is this consistent with what is required by NEPA?"

Answer: The proposed mitigation measures are described in detail in the Final EIS/EIR, Volume I. The Groundwater Monitoring and Management Plan is contained in Volume IV of the document. Additional mitigation measures, such as the terms and conditions to be set by the Fish and Wildlife Service in its biological opinion to BLM required by the Endangered Species Act, as well as other standard mitigating measures routinely required by BLM for such land use authorizations, will also be required as conditions of any project approval in the Record of Decision. The proposed mitigation measures are consistent with the requirements of the National Environmental Policy Act.

Question 3: "At least one geologist that I have heard from claims that the recharge rate is a necessary piece of information to truly assess the likelihood and severity of impacts from this project on the aquifer and overlying lands. What leads you to believe that such information is not vital before beginning the project?"

Answer: We agree that the recharge rate is important information, but credible hydrologists representing both Metropolitan and the USGS are unable to agree on the amount of recharge to the groundwater basin. Therefore, BLM, NPS, USGS, and the County of San Bernardino agree that the Groundwater Monitoring and Management Plan they have developed in cooperation with Metropolitan will require extensive scientific study and monitoring facilities to more precisely determine the recharge into the groundwater basin.

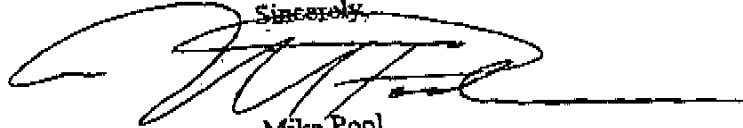
Question 4: "Given the scientific and public criticism of the monitoring system and the preponderance of evidence that the recharge rate is no more than 5,000 acre-feet/year, why doesn't BLM simply limit the project to Colorado River water storage and no more than 5,000 acre-feet/year of groundwater mining?"

Answer: If the project pumps more water than it stores, there will be less groundwater discharge at Bristol and Cadiz Dry Lakes. With time, this imbalance could cause groundwater levels to decline beneath the dry lakes. This decline in groundwater levels could potentially impact critical resources. The management and monitoring plan is designed to protect the critical resources no matter what the natural recharge rate is, by providing "early warning" of potential adverse impacts to critical resources. With such early warning, adverse impacts would

be prevented by implementation of corrective actions. The plan and BLM's absolute authority through the right-of-way grant over transfer of water both into and out of the Cadiz project area provides the necessary protections we believe are needed to ensure protection of critical Federal resources.

I hope you find these answers responsive to your questions. Thank you for your interest. I will continue to keep your staff informed of BLM's decisionmaking process on this project.

Sincerely,



Mike Pool
State Director

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