

MASTER RESPONSE NO. 7 - FORMULATION AND SCREENING OF POTENTIAL PROJECTS

Comments were received that questioned the scope of formulation and screening of potential projects considered in the environmental documents, or suggested additional “alternative projects” such as limiting the project to storage operations or using water conservation measures to meet the project purpose and need.

CEQA and NEPA both require that an EIR/EIS discuss a reasonable range of alternatives that would feasibly attain most of the basic project goals and would substantially lessen or avoid its environmental impacts. (Title 14, California Code of Regulations, section 15126.6; Title 40, Code of Federal Regulations, section 1502.14) There is no minimum number of alternatives that must be discussed, although inclusion of a "no project" or "no action" alternative is required. In addition, the EIR/EIS should include a discussion of alternatives that were considered but eliminated from detailed analysis.

Section 3 of the Draft EIR/EIS described the process of formulating and evaluating formulation and screening of potential projects to meet the project need of providing dry-year water supply from the Colorado River resource area. This process included an initial review of potential projects, and a subsequent evaluation of alternative alignments for the Cadiz Project. To avoid confusion between the screening of potential projects and the selection of alternative alignments, the discussion of this process has been clarified in the Final EIR/EIS. Section 3 describes the screening of potential projects that lead to the selection of the combined Cadiz Storage and Transfer projects for further analysis. Section 4 discusses the selection of alternative alignments for the combined Cadiz Storage and Transfer project.

The formulation and evaluation of potential alternatives was conducted in a series of increasingly detailed studies. Each alternative was formulated and reviewed in light of the project goal of developing storage and dry-year water supplies in the Colorado River area. As described in Section 3.4, a total of thirteen potential projects were initially identified, including ten groundwater storage projects, one water transfer project, and two projects that would desalt agricultural drainage water. For the reasons described in Section 3.5, all of the potential projects except the Cadiz Valley Groundwater Storage Project, the Cadiz Valley Dry-Year Transfer Project, and the Hayfield Valley Groundwater Storage Project, were eliminated from detailed analysis because of technical or environmental considerations that rendered the other alternatives infeasible. The Hayfield Project was separately analyzed and is being implemented by Metropolitan.

The two projects located at Cadiz Valley were combined into one project. All project operations at the Cadiz Valley site will be governed by and subject to the provisions of the Groundwater Monitoring and Management Plan (Final EIR/EIS, Volume IV). Both storage of Colorado River water and withdrawal of Colorado River water and indigenous groundwater must be monitored and managed to avoid adverse impacts to critical resources. The amount of water that may be withdrawn will be determined in compliance with the requirements of the Management Plan and, if indigenous water cannot be taken without adverse impacts to critical resources, then the project will be operated as a “storage-only” project. With the implementation of the Management Plan, critical resources will receive the same level of protection regardless of whether the project is operated as a “storage only” project or for both storage and transfer of water. Therefore, all of the potential environmental impacts which could result from a "storage only" project have been evaluated.

There is no set amount of indigenous groundwater that may be transferred under the Cadiz Project, and therefore, the Final EIR/EIS does not evaluate the potential impacts from the transfer of a set

amount of water. Rather, the project will be implemented in accordance with the Management Plan that requires operation of the aquifer so that no adverse impacts occur to critical resources. Therefore, any project definition that is based on a specified amount of indigenous water for transfer is not appropriate. The project may only transfer an amount of water that meets the requirements of the Management Plan.

Conservation was not considered an alternative to the Cadiz Project because a wide variety of conservation methods are already being implemented by Metropolitan and its member agencies. (Final EIR/EIS, Volume I, Sections 2.3.3 and 2.4.4) Even with these conservation methods in place, and including all other known projects for meeting the dry-year demand, including the Cadiz and Hayfield Projects, there will still be an unmet demand for water in Metropolitan's service area. Thus, a conservation alternative would not achieve the project goals. More information on Metropolitan's conservation efforts is provided in Master Response "Water Conservation."

The formulation and selection of site-specific formulation and screening of potential projects for the Cadiz Groundwater Storage and Dry-Year Supply Program is described in Sections 3.6 and 4. Further information regarding the selection of alternative alignments for the Cadiz Project is discussed in Master Response "Alignment Alternatives."