



MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

February 17, 2006

Brian Amme
Bureau of Land Management
P.O. Box 12000
Reno, NV 89520-0006

Dear Mr. Amme:

Draft Programmatic Environmental Impact Statement for
Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States

1

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Draft Programmatic Environmental Impact Statement (Draft PEIS) for Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States (Project). This letter contains Metropolitan's response to the Draft Programmatic EIS/EIR as a potentially affected agency.

2

Metropolitan provides half of the water used by the 18 million residents of the six-county southern California coastal plain. The infrastructure to supply this critical resource includes Metropolitan-owned aqueducts, pipelines, tunnels, reservoirs, treatment plants, electrical transmission lines and other facilities located in the California counties of Los Angeles, Orange, San Bernardino, Riverside, and San Diego, and Clark County, Nevada. Metropolitan also relies on water delivered through the State Water Project operated by the California Department of Water Resources (CDWR). The State Water Project transports water from Lake Oroville in northern California to water agencies located throughout California.

3

The Draft PEIS and attached maps do not provide specific locations for the application of herbicides. Without this information, Metropolitan cannot determine potential impacts to its or CDWR's facilities. Therefore, our comments at this time will be of a general nature and will focus on the areas in the lower Colorado River Hydrologic region, which would affect the Colorado River.

4

Metropolitan owns and operates the 242-mile Colorado River Aqueduct (CRA) and associated features. Most of the CRA is located in the rural, desert regions of San Bernardino and Riverside counties. The CRA consists of tunnels, open canals and buried pipelines. The CRA also includes large electrical pumping plants, above and below ground reservoirs and aquifers, access and patrol roads, communication facilities, and residential housing sites.

5

The Preferred Alternative (Alternative B) will triple the current herbicide coverage to over 900,000 acres. The sheer increase in area and the additional herbicides being proposed suggests that this alternative may have an increased risk to water quality. The other alternatives (except for the no action alternative [A] and the no herbicide alternative [C]) will also increase the acreage of coverage from current practices.

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- 6 The Preferred Alternative (B) and the other alternatives (excluding C), include herbicide application to aquatic and terrestrial areas for vegetation management. The aquatic herbicide application includes wetlands and riparian areas. The Draft PEIS does not specify the location, inclusion, or proximity of these areas to the Colorado River. Metropolitan is concerned about herbicide application directly to aquatic areas that are hydrologically connected to the Colorado River.
- 7 Metropolitan is also concerned about the terrestrial herbicide application that could occur close to the Colorado River. The Standard Operating Procedures in the Draft PEIS specify buffer zones of 100 feet for aerial, 25 feet for vehicle, and 10 feet for hand spray applications. These buffer zones should be adequate to avoid overspray but aerial applications may be more prone to error. However, the mechanism to ensure compliance with these procedures has not been specified.
- 8 Monitoring to evaluate the impacts on water quality is briefly discussed in Chapter 2. The Draft PEIS states that water quality monitoring should be conducted within 2 years after herbicide treatment to determine the effectiveness of buffer strips and the impact on water quality. For moving bodies of surface water, such as the Colorado River, anything less than immediate monitoring after the application would be inadequate to evaluate the effects on surface water sources. The monitoring plan should include sampling immediately after and at timed intervals after each application for surface water sources. Ground water sources should be monitored for an extended period to account for the time for water percolation and infiltration into the groundwater aquifer. Aquifer hydrology should be evaluated to determine the proper locations and depths for groundwater sampling. Metropolitan recommends that a more comprehensive water quality monitoring plan be developed.
- 9 The Preferred Alternative (Alternative B) presents a substantial increase in herbicide application, which poses a concurrent increased risk to water quality. Metropolitan is concerned about these risks. The specific impacts to the lower Colorado River and watershed are not clearly delineated in the Draft PEIS. The Colorado River represents a major source of water for Southern California, as well as Nevada and Arizona. Metropolitan requests that practices that can impact drinking water sources be monitored carefully. Thus the monitoring plan must include evaluation feedback to direct, halt, or change herbicide applications that are deleteriously affecting water quality or other resources.
- 10 We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation, including a copy of the Final PEIS, for this project. If we can be of further assistance, please contact me at (213) 217-6242.

Very truly yours,



Laura J. Simonek

Manager, Environmental Planning Team

BK/lim

(Public Folders/EPU/Letters/16-FEB-06A.doc - Brian Amme)