First, I'd like to thank the Santa Margarita Water District for holding this meeting and allowing members of the public to comment on the Cadiz Valley Water Project. I am a vocal public opponent of this project, and it would be remiss not to remark that the ability of citizens of varying opinions to come together and voice their concerns is at the heart of democracy. The Santa Margarita Water District must be commended for not just rote compliance with CEQA but an act of true citizenship.

I was born in Southern California – I am a fifth generation Californian, the grandchild of orange farmers, and spent my early childhood in Orange County, so I understand the importance of water to everyone in this room. But what has changed from the time I was born in 1956, when there was an expectation of infinite resources, and today, is enormous. Then, water was for the taking. Now it is for the preserving and re-using.

The Cadiz Valley project has been packaged as a conservation effort. Anyone who follows water news knows that this is fanciful. It has one objective at its core: withdrawing 50 to 75,000 acre feet of water a year from the carbonate aquifer underlying the Mojave Desert, then shipping it to Southern Californian cities already amply fed by millions of acre feet of water from local groundwater supplies, the Colorado River, the Eastern Sierra and the Sacramento San Joaquin Bay-Delta.

There is so much water used in landscaping across the service region of the Metropolitan Water District that it's estimated that as much as 100 million gallons a day of largely imported water flows as dry season run-off in the Greater Los Angeles alone. In other words, more than twice the water sought by Cadiz already flows through our gutters as run-off from sprinklers and car washing.

I do not believe that the stakeholders behind this project have demonstrated any where near the required commitment to conservation and beneficial use of that gutter water to warrant seeking new water from beneath the Mojave Desert.

My other concerns with the project involve what appears to be circumvention of federal inspection of a project that has clear potential to gravely impact public land of intense cultural, biological and environmental value to the entire region. During the original Cadiz federal environmental impact survey, recharge estimates were far more conservative than the ones proffered in the new DEIR. The new project hasn't so much as answered those criticisms as shut out the critics by claiming that using a railway line across federal land doesn't require federal review. It purports to use a USGS model, but doesn't invite USGS scientists to review the results.

It does not satisfactorily address water quality problems to do with Chromium VI levels noted in the Mojave, a salt whose acceptability in drinking water is the subject of steeply downward health advisories.

It offers a private consortium as caretakers of public land, while shutting out the respected and vigilant existing public caretakers.

It proposes sinking deep wells whose effects could be wide-ranging and impossible to monitor, or effectively trace back to the project.

Its chief beneficiaries are speculators, not the public.

The Cadiz project was turned down by Metropolitan in 2002 after being put up for full federal scrutiny. Ten years later, its private backers return saying it's safe because there is new branding and less scrutiny.

It also carries grave liability issues for the customers of the Santa Margarita Water District and other partners. The Los Angeles Department of Water & Power announced last year that it has spent more than a billion dollars on dust suppression in the Owens Lake. DWP drained the lake that used to feed its aqueduct and then began pumping the groundwater of a dry playa. The conditions once DWP began pumping from what it reduced to Owens Dry Lake were exactly comparable to those now present in Cadiz Valley. Dust storms and a billion dollar liability was the upshot.

Can the customers of the Santa Margarita Water District afford that billion dollar legacy?

Finally, much has been made of jobs and opportunity. Capturing the water currently wasted, conservation of water already imported to the region, could not only create twice the water of the Cadiz Valley Project, but many times the jobs for everyone from engineers, home builders, landscape companies and home improvement stores. The difference is that these jobs would be longer lasting, more evenly spread out across the population and more beneficial to the cities served and the environments tapped for water.

Thank you for your time.