

Eagle Mountain Pumped Storage Project, FERC Project 13123

Comments on Draft EIR

Noel Ludwig, BLM Hydrologist, California Desert District

Peter Godfrey, BLM Hydrologist, California Desert District

October 7, 2010

Comment Number	Location	Comment
1	Section 2.4.1, Page 2-11	The existing low point of the Upper Reservoir pit rim is listed as being at both 2380 feet and 2440 feet.
2	Section 2.6	List of Approvals and Permits Required should include a Bureau of Reclamation determination of whether or not groundwater produced will be Colorado River water.
3	Figures 2-2 and 3.0-1	These figures need to have legends.
4	Page 3.1-31, Impact 3.1-7	Monitoring of groundwater levels in—and prevention of seepage into—alluvium and earthen dam material, as described in PDF GW-1, MM GW-4, and Section 3.3.3.3.8, would be a measure to further reduce the risk of project-induced saturation that could cause liquefaction during a seismic event.
5	Section 3.2.2	The statement “hydrologically disconnected” is misleading. These springs provide recharge to the Pinto and Chuckwalla Groundwater Basins. Impact to them would be an impact to the basins.
6	Section 3.2.3.2, Page 3.2-7	Thresholds of significance should be expanded to include any impacts on springs or seeps in the area, as described in the previous section. Eagle Tank and Buzzard Springs are both on Federal land, at lower elevations than (and thus likely downgradient of) the proposed upper reservoir. This issue should also be addressed in Section 3.2.3.3 and in the mitigation measures in Section 3.2.4.
7	Pages 3.2-14 and 3.2-18	References to mitigation measure PDF GW-1 apparently should refer to PDF GW-2.
8	Section 3.2.4, Page 3.2-16	Measure PDF GW-2 should include measures to buffer pH levels if these are found to be outside acceptable limits. Acceptable limits should be stated.
9	Section 3.16	This section should include two measures (perhaps as PDFs, though the hazard is deemed less than significant): (a) preparation of a plan for storing hazardous materials used onsite, such as caustic chemicals and acids used for RO membrane cleaning (Section 2.4.9), to reduce potential hazards due to spills or other sources of human contact; and (b) creation of a spill response plan (that includes notifying the BLM authorized officer) in case the former measure fails.

10	Section 3.3.3.3.4	<p>Groundwater within the Chuckwalla Groundwater Basin IS hydrologically connected to the Colorado River through the Palo Verde Mesa Groundwater Basin and the Palo Verde Valley Groundwater Basin. As such, ANY withdrawal will have an effect on the Colorado River at some time in the future. This impact should not be ignored.</p> <p>The Colorado River Basin is fully adjudicated. The Accounting Surface Methodology is used by the U.S. Supreme Court’s designated watermaster to determine water that IS Colorado River Water. Water above the accounting surface is water that would otherwise flow into the Colorado River and the use / diversion of this water would have an impact on the River.</p>
11	Figure 3.3-20	<p>The location of the Water Supply Image Wells may not reflect the true geometry of the basin. The results may underestimate drawdown over time.</p>
12		
13		
14		
15		
16		
17		