



DESERT TORTOISE COUNCIL

4654 East Avenue S #257B
Palmdale, California 93552

www.deserttortoise.org
eac@deserttortoise.org

20 March 2018

Mr. Tom Love, General Manager
Upper San Gabriel Valley Municipal Water District
602 East Huntington Drive, Suite B
Monrovia, California 91016
info@usgvmwd.org

RE: Do not sign Letter of Intent for the Cadiz Pipeline

Dear Mr. Love,

The Desert Tortoise Council (Council) is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of this species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council routinely provides information to individuals, organizations, and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges.

Herein the Council urges Board of Directors Mr. Chavez, Mr. Fellow, Mr. Treviño, Mr. Contreras, and Mr. Urias of the Upper San Gabriel Valley Municipal Water District (Water District) to not enter into a Letter of Intent for the proposed Cadiz Pipeline project. The project will predictably affect numerous natural resources by drawing from the regional water table at rates faster than it could naturally recharge. Vegetation and wildlife communities in the region would be affected by this action, and we are most concerned that the project will adversely affect the state- and federally-designated Threatened Agassiz's desert tortoise (*Gopherus agassizii*). Surveys completed by several of our Board members in 1998 and again in 2010 revealed that tortoises are found along the proposed pipeline route between the community of Cadiz and State Route 62 to the south. Implementation of the Cadiz Water Project would both directly and indirectly affect tortoise populations in the region. Of particular concern is the aquifer's adjacency to the Chemehuevi Critical Habitat Unit for Agassiz's desert tortoise, where tortoise populations declined by an estimated 65% between 2004 and 2014 (USFWS 2015). The Cadiz Water Project would likely contribute to this decline, pushing tortoise populations in the region further toward extirpation.

As you may be aware, the proposal to install the Cadiz Pipeline has been reviewed by the public on two separate occasions, with the Bureau of Land Management (BLM) serving as the Federal Lead Agency. Both in 1999 and again in 2011, the public opposed the proposed pipeline and the BLM issued statements that it would not issue the right-of-way grant and other authorizations to the Cadiz Water Company. In spite of this opposition, the current Administration has decided to side-step the federal government's public process and authorize the project with no requirement to mitigate the loss of public resources.

We believe the Water District has an excellent opportunity to support the public's opposition of this environmentally harmful project by not signing the Letter of Intent for the Cadiz Pipeline. Rather, the Water District should continue to collaborate with local water projects and conservation measures that address local infrastructure needs, create local jobs, and conscientiously increase water supply. Our communities expect the Water District to make decisions that support the protection of our water, parks, and wildlife. Herein, the Council urges you to not endorse the Letter of Intent.

Regards,



Edward L. LaRue, Jr., M.S.
Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson

Literature Cited

U.S. Fish and Wildlife Service. 2015. Range-wide Monitoring of the Mojave Desert Tortoise (*Gopherus agassizii*): 2013 and 2014 Annual Reports. Report by the Desert Tortoise Recovery Office, U.S. Fish and Wildlife Service, Reno, Nevada. 44 pages.