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**Letter - R2. San Diego Regional Chamber of Commerce. Signatory - Jessie J. Knight, Jr..**

April 26, 2002

Response to Comment R2-1

Comment noted.

Mr. Bruce D. Ellis  
U.S. Bureau of Reclamation  
Phoenix Area Office  
PO Box 81169  
Phoenix, AZ 85069-1169

Mr. Elston Grubaugh  
Manager, Resources, Mgmt., & Planning  
Imperial Irrigation District  
PO Box 937  
Imperial, CA 92251

Dear Mr. Ellis and Mr. Grubaugh:

On behalf of the San Diego Regional Chamber of Commerce, I would like to take the opportunity to comment on the draft EIR/EIS for the Imperial Irrigation District (IID) – San Diego County Water Authority water transfer project.

The Chamber has been a long-time supporter of the unprecedented IID-San Diego water transfer. This transfer will replace the water that we will lose as a result of California's mandate to reduce its use of Colorado River water to 4.4 million acre feet. According to the Secretary of the Interior, California must implement this mandate, the Quantification Settlement Agreement, by the end of this year or risk the immediate loss of 700,000 acre feet on January 1, 2003. Such a loss would have an enormous detrimental effect on all of California, and especially the San Diego region, which is almost exclusively dependent on imported water, the vast majority of which comes from the Colorado River.

R2-1

The transfer provides much-needed diversification of the San Diego County Water Authority's supply, in addition to serving as replacement water. The Authority is aggressively pursuing other sources such as seawater desalination, additional conservation measures and recycling, but these will not be adequate to replace what we will eventually lose from the Colorado River water entitlement.

The Chamber believes it is critical to the San Diego region, and to all of California, that the Imperial Irrigation District transfer comes to fruition this year. Our economy and livelihood depend on it.

Sincerely,

Jessie J. Knight, Jr.  
President & CEO

JJK:av



**MWD**  
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

April 26, 2002

Mr. Bruce D. Ellis  
U.S. Bureau of Reclamation  
Phoenix Area Office (PXAO-1500)  
P.O. Box 81169  
Phoenix, AZ 85069-1169

Mr. Elston Grubaugh  
Manager of Resources,  
Management, and Planning Department  
Imperial Irrigation District  
P.O. Box 937  
Imperial, CA 92251

Gentlemen:

January 2002 Draft Environmental Impact Report/Environmental Impact Statement  
for the Imperial Irrigation District Water Conservation and Transfer Project  
and Draft Habitat Conservation Plan



**Letter - R3. Metropolitan Water District of  
Southern California. Signatory - Laura J.  
Simonek.**

**Response to Comment R3-1**

Comment noted.

**Response to Comment R3-2**

IID does not agree that in the absence of the QSA, IID and SDCWA must receive approval of CVWD and MWD before a transfer from IID to SDCWA could occur. This difference of opinion does not impact the environmental analysis. Any legal objections to such a transfer can be resolved by agreement or in the appropriate forum. As noted in the Draft EIR/EIS, IID and SDCWA have filed a petition seeking SWRCB approval of the water transfers, including a determination that the Project is in furtherance of SWRCB Decision 1600, SWRCB Order WR 8820, Article X, Section 2 of the California Constitution, and Sections 100 and 109 of the Water Code. Reclamation's agreement to implement the change in diversion required for a transfer to SDCWA, in a form similar to the IA anticipated for the QSA, would also be needed.

R3-1

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to review the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the Imperial Irrigation District (IID) Water Conservation and Transfer Project (Project) and Draft Habitat Conservation Plan (HCP). Metropolitan is submitting comments as a potentially affected public agency.

Metropolitan strongly supports efforts to facilitate long-term shifts of water made available voluntarily from agriculture to beneficial urban uses. Metropolitan in conjunction with the IID, Coachella Valley Water District (CVWD), and the San Diego County Water Authority (SDCWA) are undertaking cooperative efforts to reduce the State of California's consumption of Colorado River Water to its annual apportionment under the proposed Quantification Settlement Agreement (QSA) and California's Colorado River Water Use Plan. The IID Water Conservation and Transfer Project is an important part of California's effort to reduce its current use of approximately 5.2 million acre-feet of Colorado River water to the 4.4 million acre-foot normal year levels.

**Colorado River Water Rights**

R3-2

In the description of the proposed project, there is a discussion indicating that the IID-SDCWA transfer could proceed in the absence of the execution of the QSA. The QSA provides the

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**Response to Comment R3-3**

See response to comment R3-2.

**Response to Comment R3-4**

IID maintains that because conservation of water is a valid agricultural use, any mitigation required for creating the conserved water is also a valid agricultural use. One way to mitigate for reduction in drainage inflow to the Salton Sea is to fallow certain agricultural fields and provide the water that would otherwise be used on those fields to the Salton Sea. The ancillary use of water for required mitigation necessary to utilize an allowed agricultural use is itself an agricultural use. Thus, the fallowing is a valid beneficial agricultural use. The comment uses the term "transitional evapotranspiration land fallowing", a term that has no commonly understood meaning in the context of the creation of conserved water. "Transition" is defined in Merriam Webster's Collegiate Dictionary as "1. a passage from one state, stage, subject, or place to another; 2. a movement, development, or evolution from one form, stage, or style to another..." The comment suggests that water be run through a field that is not under cultivation and then released into the drains which in turn lead to the Salton Sea. All this would accomplish is a significant loss of water because of evaporation.

institutional and legal framework that would allow the parties to implement the various water transfers, conservation projects and storage programs that constitute California's Colorado River Water Use Plan (California Plan). The use, allocation and movement of Colorado River water is governed by federal law known as The Law of the River, which includes statutes, acts of Congress, an inter-state compact, United States Supreme Court decrees, and an international treaty. The allocation of Colorado River water among California water agencies is specifically governed by the water rights priority system established by the 1931 Seven Party Agreement. The Seven Party Agreement established a priority system in which water unused in one priority becomes available for use by the next priority. Under this cascading priority system, water transferred by IID to the SDCWA must flow through the priorities of the CVWD and Metropolitan. Accordingly, the proposed transfer must have the permission of both CVWD and Metropolitan for the water to reach the SDCWA. The QSA, among a number of other things, would provide the approval of both CVWD and Metropolitan to the IID-SDCWA transfer. In the absence of the QSA, the transfer parties must seek and receive approval of CVWD and Metropolitan before the transfer can occur and the environmental documentation should reflect that fact.

**Water Conservation Strategies**

The Draft EIR/EIS evaluates two primary methods for conservation water – (i) on-farm and distribution systems conservation methods and (ii) fallowing. Metropolitan concurs with the conclusion of the Draft EIR/EIS that implementation of a fallowing conservation strategy would significantly reduce potential environmental effects. As outlined in the Draft EIR/EIS, fallowing is evaluated as a method to provide conserved water to meet the water transfer goals of the Project and to minimize or offset the temporal impacts of increased salinity of the Salton Sea.

Water made available to offset impacts to the Salton Sea could be made available through transitional evapotranspiration land fallowing and would include voluntary fallowing of land for an interim period, such that the Project would have no effect on Salton Sea inflows and salinity for the transition period. This could be accomplished by initially making available for transfer or acquisition, the amount of water that would have been lost to on-farm evapotranspiration while permitting the remaining amount to be used for farmland management and maintenance before being discharged to agricultural drains, the New or Alamo rivers, or the Salton Sea. The water used for farmland management and maintenance would be an application of water to a recognized contract purpose within an existing contract service area. The receipt of such water in the agricultural drains, the New or Alamo rivers, and the Salton Sea would be incidental to contract water use purposes. It should be noted that while the Salton Sea receives drainage from Coachella Valley, Imperial Valley, and Mexicali Valley occurring as the result of the use of Colorado River Water in those valleys, the Salton Sea has no Colorado River water right nor a Colorado River water contract for the use of Colorado River as required under The Law of the

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**Response to Comment R3-5**

Refer to the Master Response on *Socioeconomics—Crop Type Assumptions for Socioeconomic Analysis of Fallowing* in Section 3 of this Final EIR/EIS.

**Response to Comment R3-6**

Refer to the Master Responses on *Socioeconomics—Crop Type Assumptions for Socioeconomic Analysis of Fallowing, Hydrology—Development of the Baseline* and *Hydrology—Selenium Mitigation* in Section 3 of this Final EIR/EIS.

**Response to Comment R3-7**

Please refer to the Master Responses on *Hydrology—Development of the Baseline and Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 3 in this Final EIR/EIS.

R 3-4

River. Once the transition period has ended, transitional land fallowing could be replaced by either on-farm/distribution system conservation or voluntary direct fallowing wherein all water that otherwise would have been applied to the land is transferred.

**Economic Analysis of the Proposed Program**

R 3-5

Metropolitan acknowledges that while a fallowing conservation strategy would reduce the potential environmental effects of the proposed transfer, additional socioeconomic or third party impacts may result. In evaluating socioeconomic effects of fallowing, the Draft EIR/EIS states the historical crop pattern was used because the actual future participants in a voluntary fallowing program cannot be identified in advance with certainty, and IID believes it is reasonable to assume that the program will involve a range of crops through the IID Water Service Area. The Draft EIR/EIS acknowledges that if the actual mix of fallowed lands includes a higher percentage of less valuable crops, the impacts could be less than what are reported. This conclusion has been verified by two additional studies that have been prepared that evaluated the economic effects associated with fallowing in the IID Water Service Area.<sup>1</sup> Thus, it appears that a fallowing program could be crafted to minimize the socioeconomic effects by limiting participation to low value crops or lands having low productivity. Such a focused fallowing program should be included in the Final EIR/EIS and the results of these studies factored into any decision on the proposed program.

**Overstated Effects**

R 3-6

In reviewing the Draft EIR/EIS, it appears that the Draft EIR/EIS in presenting a "worst case" assessment has resulted in an overly conservative estimate of potential effects in a number of resource areas. This overstatement of effects can be seen in the analysis of potential socioeconomic effects, in the estimates of inflows to the Salton Sea and in the estimated increased selenium concentrations on aquatic resources. A wide range of information on the effects should be included in the Final EIR/EIS. Metropolitan encourages the development of adaptive management techniques in order to adjust mitigation plans adopted for the proposed Project as necessary to reflect actual impacts as they become known.

**Effects on the Salton Sea**

R 3-7

Measures proposed in the Draft EIR/EIS to mitigate impacts to Salton Sea aquatic resources are based on the difference in years at which Salton Sea salinity reaches 60,000 mg/L compared to the baseline. These respective differences are shown in Figure 3.1-29 of the Draft EIR/EIS. The

<sup>1</sup> These studies are: *Economic Impacts of Fallowing Irrigated Land in the Imperial Irrigation District*, prepared by the U.S. Bureau of Reclamation, and *Independent Analysis of the Economic Impact Studies in the IID Water Conservation and Transfer Project EIR/EIS*, prepared by CIC Research.

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methodology utilized by the Draft EIR/EIS overestimates the number of years from which a proposed action would cause the Salton Sea salinity to reach 60,000 mg/L as compared to the baseline. This overestimation is principally due to the assumption of projected inflows that are too high. Specifically, projected drainage from Mexico into the Imperial Valley was based on the average annual drainage from 1989 through 1999. During this period the annual flow of the Colorado River received by Mexico at the Northerly International Boundary (NIB) exceeded two million acre-feet in four or those 11 years. There is a strong correlation between flows in the Colorado River at NIB and drainage from the Mexicali Valley into the Imperial Valley. Considering that the future frequency of flood control releases at Hoover Dam resulting in excess flows reaching the NIB would be less than what occurred from 1989 through 1999, it follows that future annual average inflow from Mexico would likely be less than the 1989 through 1999 average. Further projected runoff to the Salton Sea from areas not tributary to the Imperial and Coachella valleys is overestimated.

R 2-7

Irrespective of the projected inflow, it appeared that consideration was not given to the effects of the loss of lower trophic level species at salinities lower than 60,000 mg/L. This would lead to a significant decline in the Salton Sea fishery. As a result the quantification of impacts to Salton Sea aquatic resources is conservative.

R 2-8

Effects on Increased Selenium Concentrations in Rivers and Drains on Aquatic Resources

The evaluation of effects of increased selenium concentrations in the Alamo River, New River, and irrigation drains presumes that significant bioaccumulation also occurs in aquatic species associated with these rivers and drains. As a result the Draft EIR/EIS concludes that the projected increases in selenium concentrations in these water bodies would have a significant impact on aquatic species using these environs and proposes measures to mitigate the estimated impact. Based on a review of studies completed by the Department of the Interior (Setmire *et al.* 1996<sup>2</sup>, Skorupa 1998<sup>4</sup>.) Metropolitan believes that the impact to aquatic resources of the rivers and drains is overestimated. As acknowledged in the Draft EIR/EIS, the Department of the Interior has concluded that sediments beneath the Salton Sea are the dominant source for exposure to aquatic organisms in the Salton Sea region (Setmire *et al.* 1993; Setmire and Schroeder 1998<sup>5</sup>).

R 2-9

Response to Comment R3-8

Tilapia were the focus of the analysis of the potential impact to fish-eating birds because available information indicates that tilapia are the predominant prey of these species. Recent investigations have found that tilapia of the Salton Sea have a diverse diet, of which pileworms is only one component (Costa-Pierce and Riedel 2000b). In the nearshore and deltaic areas of the Sea where tilapia abundance is highest, Costa-Pierce and Riedel (2000b) found tilapia to have a very diverse diet that includes a substantial amount of sediment and detrital matter. Thus, tilapia would not be expected to be lost at the lower salinity at which pileworms are expected to be impacted.

Response to Comment R3-9

The estimates of risk to fish and wildlife in the drains and rivers are conservative, but not overly so. We have used 5 ppb selenium in water as a threshold for chronic toxicity (the current state and national water quality criterion) instead of a value of 2 ppb, as suggested by USFWS as their lowest threshold value for toxicity from water-borne selenium.

We acknowledge that the Salton Sea sediments are the primary source of selenium exposure in that ecosystem and that exposure in the Sea accounts for much more bird exposure than does exposure through the drains and rivers. However, we must also acknowledge projections of water-borne concentrations exceeding threshold values if they occur in areas with known bird (or other receptor) use. In addition, some birds (e.g., rails) are more likely to experience exposure from their drain and river habitats than from the sea.

<sup>2</sup> Both of the cited documents are included in the list of references contained on page 9-26 of the Draft EIR/EIS.

<sup>3</sup> This document is included in the list of references contained on page 9-26 of the Draft EIR/EIS.

<sup>4</sup> Skorupa; 1998; "Selenium Poisoning of Fish and Wildlife in Nature: Lessons from Twelve Real-World Examples"; pages 315354 in: W.T. Grankenberg, Jr. and R.A. Engberg (eds.); *Environmental Chemistry of Selenium*; Marcel Dekker, Inc., New York.

<sup>5</sup> Both of the cited documents are included in the list of references contained on page 9-26 of the Draft EIR/EIS.

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**Response to Comment R3-10**

The commenter correctly notes that the water balance used in the IIDSS estimates higher volumes of tailwater and lower volumes of tilewater than those noted in the referenced report. In responding to this comment we are not clear on how the magnitude of the differences were computed. The following table shows the average annual volumes of tailwater and tilewater discharge we find in IIDSS historical model output and in the report referenced by the commenter:

	Reclamation (1)	IIDSS	Difference
Tailwater - KAFY	415,584	389,951	25,633
Tilewater - KAFY	323,042	394,165	71,123
<b>Total - KAFY</b>	<b>738,626</b>	<b>784,116</b>	<b>45,490</b>

Note: (1) Includes values for both reclamation and crop leaching.  
 Source: Jensen and Walter (1997) (Special Report prepared for the Bureau of Reclamation).

The historical distribution between tailwater and tilewater developed for the IIDSS relied on tailwater studies performed by the IID Irrigation Management Unit and other entities, analyses of tilewater sump discharges versus delivered water volumes carried out by the EIR/EIS team, and various other studies. Therefore, we are confident in the analyses used to develop our estimates of tailwater and tilewater discharge.

However, from the standpoint of the water quality issues being raised in this comment, these differences in water balances are largely beside the point. The Reclamation study and the IIDSS agree closely with respect to the volume of water delivered to farms and, by extension, would be in agreement on the mass of TDS and selenium conveyed to farm fields. To maintain salt balance in the field, these masses are removed, largely by tilewater but partly by tailwater. Therefore, as long as both the Reclamation study and the IIDSS assume that TDS and selenium conveyed to the fields are discharged to the drains and that there is not an accumulation of these constituents in the soil profile, the contribution of the IID irrigation system to mass loadings to the Sea is governed by the masses of these constituents imported into the district and not by the volumes of tailwater and tilewater that convey these loadings to the Sea. Moreover, because the tilewater volumes computed in the IIDSS are higher than those used in the Reclamation study, the mean TDS and selenium concentrations would be lower because the mass loads would be distributed over a large volume of tilewater as well as a larger total volume of drainage water.

R3-10

Impacts to aquatic resources using rivers and drains are further overestimated as a result of the IID Service Area water balance. Specifically, the projected baseline amounts of tailwater and tilewater entering IID's drainage system as depicted on Figure 3.1-16 of the Draft EIR/EIS do not agree with previous estimates made by the U.S. Bureau of Reclamation.<sup>6</sup> The estimated amount of tilewater assumed in the Draft EIR/EIS exceeds the Bureau of Reclamation's estimate by approximately 156,000 acre-feet. The estimated amount of tailwater assumed in the Draft EIR/EIS is less than the Bureau of Reclamation's estimate by approximately 94,000 acre-feet. As tilewater is highly concentrated with the constituents of concern (including selenium) relative to tailwater, larger proportions of tilewater in the blended drainage results in higher concentrations of the constituents of concern. Accordingly, if the Draft EIR/EIS assumed the relative amounts of tailwater and tilewater were similar to that previously estimated by the Bureau of Reclamation, the projected increases in selenium would be less than reported.

**Projected Future Leaching Requirements**

R3-11

The Draft EIR/EIS assumes that salinity of the Colorado River above Imperial Dam would increase from the present level of approximately 700 mg/L to 879 mg/L for the life of the Proposed Project. Accordingly, the Draft EIR/EIS assumes that lands irrigated with Colorado River water would require additional water to leach increasing amounts of salts that would otherwise collect in the crop root zone. With respect to irrigation practices in the Mexicali Valley, the Draft EIR/EIS projection of drainage into the Imperial Valley and thus the Salton Sea incorporates a three percent increase to account for increased leaching in the Mexicali Valley. The Draft EIR/EIS does not provide or cite technical studies that demonstrate that the present level of leaching in the Imperial and Coachella valleys would not be adequate to manage the assumed future increased salinity in Colorado River water. Page 3-17 of the Draft HCP states that higher salinity in the Colorado River will require that IID and CVWD divert more water from the Colorado River to leach salt from the agricultural fields for crop production. However, the Draft HCP appropriately acknowledges that enforcement of California's Colorado River agricultural entitlements to 3.85 MAFY would limit additional diversions from the Colorado River for this required additional leaching. The Draft HCP describes one possible scenario as to how farmers may manage land to address increases in salinity levels such as choosing to idle some agriculture ground to allow for additional leaching of other more productive ground. Another possible scenario is that farmers may choose to conserve water on their own rather than take land out of production. Irrespective of the many responses a farmer may take to deal with reduced water availability to IID and CVWD, the projected reductions in IID baseline drainage to the Salton Sea from IID's historical drainage, as documented in Appendix F to the Draft EIR/EIS, is appropriate.

<sup>6</sup> June 1997 Special Report prepared by Marvin E. Jensen and Ivan A. Walter for Reclamation entitled, *Assessment of 1987-1996 Water Use by the Imperial Irrigation District Using Water Balance and Cropping Data*

### **Response to Comment R3-10 (continued)**

In conclusion, it appears that the comment does not fully capture the relation between tilewater and tailwater volumes and water quality in IID drains. As can be computed through mass balance and has been observed in field studies of IID drain discharges, higher tilewater volumes correspond to lower concentrations of TDS and selenium in tilewater. Similarly, for similar volumes of delivered water, higher drainage flows composed of combined tilewater and tailwater discharges would be expected to have lower TDS and selenium concentrations than would lower flows.

### **Response to Comment R3-11**

In development of the IIDSS, an analysis was made of existing leaching practices at IID and of how these practices would change in response to an increase in Colorado River salinity. Based on the analysis, and its application in IIDSS modeling, an average district-wide annual increase of 3 percent was computed for the volume of water required for leaching under the Baseline salinity regime. In the IIDSS Baseline simulations, additional leaching water was provided at gates when the increased salinity of delivered water would result in a long-term failure to satisfy leaching requirements defined by historic soil salinity levels, but not at gates where historical deliveries provided adequate water for leaching under the Baseline's assumption of increased salinity. Thus, the average 3-percent increase was developed from a gate-by-gate analysis of whether or not historical deliveries provided adequate water to meet Baseline leaching requirements.

The increased leaching requirement computed by the IIDSS was then used as the basis for our assumptions of future leaching practices in the Mexicali Valley.

As noted in the comment, while the impact of the increased leaching requirement under the Baseline would be an increase in discharge to the Salton Sea, because the Baseline also includes consideration of other factors (refer to Master Response on *Hydrology—Development of the Baseline* in Section 3 in this Final EIR/EIS), such as the IID/MWD Water Conservation Agreement, the Baseline flow to the Sea is predicted to be lower than historical flows.

Mr. Bruce D. Ellis  
Mr. Elston Grubaugh  
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**Inadvertent Overrun and Payback Program**

R3-12 [ The proposed Inadvertent Overrun and Payback Program was developed to address unintentional use in excess of a water user's Colorado River entitlement. The Draft EIR/EIS implies that this is "planned over use" by identifying a level of fallowing that would be necessary to offset a planned over use amount. This should be clarified in the Final EIR/EIS along with identifying other means to address unintentional over use.

**State Water Resources Control Board Approval**

R3-13 [ Finally, the discussion starting on page 1-44 of the Draft EIR/EIS indicates that approval is required from the State Water Resources Control Board (SWRCB) to implement the proposed water transfer from IID to SDCWA. Metropolitan disagrees with the position that the SWRCB has jurisdiction over conservation of water by IID for transfer to SDCWA or acquisition by MWD and CVWD. However, Metropolitan along with IID, CVWD, and SDCWA have agreed that any decision or order, finding of fact, or conclusion of law by the SWRCB related to the petition to the SWRCB for approval of the IID/SDCWA Transfer should have no precedential effect and cannot be used by any party in any future state or federal matter.

We appreciate the opportunity to provide input to your planning process and request to receive any future documentation on the proposed project. If we can be of further assistance, please contact me at (213) 217-6242.

Very truly yours,



Laura J. Simonek  
Manager, Environmental Planning Unit

cc: Ms. Maureen A. Stapleton  
General Manger  
San Diego County Water Authority  
4677 Overland Avenue  
San Diego CA 92123

Mr. Tom Levy  
General Manager-Chief Engineer  
Coachella Valley Water District  
P.O. Box 1058  
Coachella, CA 92236

**Response to Comment R3-12**

IID recognizes that the IOP is available only for inadvertent overruns of a water user's Colorado River entitlement. The terms of the IOP were established by Reclamation and are not controlled by IID. The Proposed Project includes a new contractual cap on IID's total diversions of Colorado River water of 3.1 MAFY, which would be further reduced by the conserved water that IID would be committed to transfer to others under the IID/SDCWA Transfer Agreement and/or the QSA. The Draft EIR/EIS predicted future water use, based on historical usage, to identify whether overruns may inadvertently occur with application of this new diversion cap. The modeling indicated that IID's total diversions would exceed the cap in certain years and in other years would be under the cap. Since the IOP requires repayment of all inadvertent overruns and does not "credit" under-use in prior or subsequent years to offset an overrun, IID must have a means of conserving water to pay back such overruns if and when they occur. An average annual payback amount was identified to reflect the potential for this additional level of conservation. Because the amount of conservation required to generate water for the transfer is quite substantial, IID anticipates that measures such as fallowing would be required to produce additional conserved water for the payback. Because of concern over the impacts of fallowing, the Draft EIR/EIS made every effort to identify this additional level of conservation.

**Response to Comment R3-13**

This comment does not address the adequacy of the EIR/EIS; therefore, no response is required.



# South Coast Air Quality Management District

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April 26, 2002

## Letter - R4. South Coast Air Quality Management District. Signatory - Mike A. Nazemi.

### Response to Comment R4-1

Responses to SCAQMD comments will be provided as requested and in accordance with Public Resources Code Section 21092.5, prior to certification of the Final EIR/EIS.

**FAXED: APRIL 26, 2002**

Mr. Elston Grubaugh  
Manager of Resources, Management and Planning Department  
Imperial Irrigation District  
333 East Barioni Blvd.,  
P. O. Box 937  
Imperial, CA 92251

Dear Dr. Grubaugh:

**Draft Environmental Impact Report (DEIR)/Environmental Impact Statement (EIS)  
Imperial Irrigation District Water Conservation and Transfer Project and  
Draft Habitat Conservation Plan**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report/ Environmental Impact Statement.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The AQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Transportation Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Mike A. Nazemi  
Manager  
Planning, Rule Development & Area Sources

Attachment

MN:JL:CB

RVCO20305-01

R4-1

**IMPERIAL IRRIGATION DISTRICT WATER CONSERVATION AND TRANSFER PROJECT, DEIR/EIS AND DRAFT HABITAT CONSERVATION PLAN (DEIR)**

**Response to Comment R4-2**

R4-2

1. **Air Quality Data:** Although the title to Table 3.7-5 on page 3.7-18 states Ozone Data Summary for the Imperial, Riverside and San Diego counties for 1994-1999, the table does not show any data for 1999. Please note that the air quality data for Riverside County for 2000 is currently available. See the attached. Indeed, Tables 3.7-6 and 3.7-7 on pages 3.7-20 and 3.7-21 show the 1999 data for the three counties. Please correct the text on page 3.7-17 and also update the tables to reflect current data.

R4-3

2. **Fugitive Dust Emissions:** On page 3.7-22 the DEIR states, "Construction emission estimates prepared for this...analysis did not include fugitive dust emissions associated with soil disturbance, because normal operations at farms involve so much soil disturbance that installation of the conservation measures is assumed to be within the range of typical activities."

Regardless of other emission sources unrelated to this project, the project proponent must quantify project emissions, and compare them to the significance thresholds. Furthermore, CEQA Guidelines do not assume that mitigation or conservation measures will be undertaken where project emissions are determined to exceed significance thresholds. In such a case, specific mitigation measures must be identified and implemented to reduce those emissions to less than significance.

R4-4

3. **Exhaust Emissions from Employees Vehicles:** Again on page 3.7-22, the DEIR states that the analysis does not "include exhaust emissions for employees commuting to the farms for construction of the on-farm measures." The reason given for this exclusion is that "normal operations at farms involve employee and owner vehicle commute activities not substantially different than those proposed for construction of the on-farm measures." It goes on to state that the "analysis assumed that any construction-related increases in emissions of fugitive dust and exhaust from employee commute vehicles would be temporary and localized." This statement is repeated on page 3.7-29 in discussing probable emissions from the Water Delivery System measures.

Please note that under CEQA Guidelines, both construction and operational emissions include exhaust emissions not only from employee vehicles but also from customer trips to and from the project site. Consequently it is important to estimate these emissions and to propose mitigation measures to reduce them should the emissions exceed the significance thresholds.

R4-5

Regarding the temporary and localized nature of construction-related exhaust emissions, it is true that construction emissions may be temporary. However, nonattainment designations, either at the federal or state level, are based on *daily* exceedances of the ambient air quality standards. As indicated in comment # 7 below, CO and NO<sub>x</sub> emissions exceed the significance thresholds. Further, construction activities spreading

Commenter notes that Table 3.7-5 in the Draft EIR/EIS provides an ozone data summary for 1994 through 1998, rather than 1999 as noted in the Draft EIR/EIS. The Draft EIR/EIS has been revised to reflect this concern. This change is indicated in this Final EIR/EIS in subsection 3.7 under Section 4.2, Text Revisions.

Tables 3.7-6 and 3.7-7 provide ambient monitoring summary data for PM10, CO, NO2, and SO2 for 1994 through 1999. Commenter provides updated air quality data for Riverside County, current through the year 2000, and requests an update of Tables 3.7-5, 3.7-6, and 3.7-7. Unlike the data presented for Riverside County, which are specific to a particular monitoring site in Indio, the data presented for Imperial County and San Diego County reflect county-wide summary information published by the California Air Resources Board (ARB). As indicated in the Draft EIR/EIS, Imperial County operates and maintains 8 monitoring sites and San Diego County operates 10 stations throughout the western two-thirds of the county. Research into the availability of comparable county-wide summary information for Imperial County and San Diego County to allow the tables to be updated for the year 2000 revealed that this information is no longer published by ARB, and is not available on their web site. While it is noted that more recent summary data would be desirable, it is not available in the format presented in the Draft EIR/EIS. Therefore, the tables could not be updated to reflect year 2000 (or more recent) data. The information presented in the Draft EIR/EIS on ambient air quality conditions is sufficient to allow the air quality impacts of the project to be evaluated, and the conclusions of the Draft EIR/EIS remain unchanged.

If the reader would like to access more recent ambient air quality monitoring data for any specific monitoring site or limited summary data for any air basin, this information is available on the following ARB and EPA websites:

<http://www.arb.ca.gov/adam/welcome.html>  
<http://www.epa.gov/air/data/reports.html>