Com No.	Page Number	Figure, or Table No.	Comment
			provided. Those emissions could then be compared to Table 3.7-4 and other information to assess whether or not current air quality planning efforts are adequately anticipating the extent of construction-related fugitive dust that would be generated by the proposed project.
82.	Page 3.7-31		The EIS/EIR concludes that impact AQ-3 would be less than significant with mitigation. The discussion of Mitigation Measure AQ-3 states that as lands are fallowed, at least one of four basic BMPs "must" be implemented. But the discussion fails to identify the parties responsible for implementing the mitigation measures or any mechanisms for ensuring that the measures are properly implemented. Without such details, it is not possible to determine that any mitigation would be implemented, let alone effective in addressing this impact.
83.	Pages 3.7-31 through 3.7-32		Impact AQ-4 addresses IID and landowner actions. Mitigation Measure AQ-4 reiterates the requirements of the general conformity rule. How do federal agencies (and which federal agencies?) become responsible for mitigating this impact? There is no clear connection between this mitigation measure and impact AQ-4. Without a specific conformity analysis, it is not at all clear that federal agency actions would mitigate impact AQ-4.
84.	Page 3.7-33		The mitigation measure for impacts associated with HCP2 (mitigation measure HCP-AQ-6) depends on implementing mitigation measures AQ-2 and AQ-3. As noted above, responsibilities for implementing mitigation measure AQ-3 are not identified, nor are any mechanisms identified for ensuring effective implementation of that measure. The EIS/EIR needs to describe the basis for assuming actual implementation of mitigation measures.
85.	Pages 3.7-34 through 3.7-36		Although impact AQ-7 is characterized as potentially significant, much of the discussion gives readers the general impression that fugitive dust emissions from exposed lakebed areas will be minimal. Comparisons with Owens Lake can be misleading because conditions there are so unusual compared to other desert basins in the US. Other factors deserve mention to provide a more balanced perspective on the potential for windblown dust from exposed shoreline areas. The large size of the area that would be exposed by lowered lake levels and the variability of conditions around the Salton Sea deserve more emphasis. The absence of air quality monitoring stations near shoreline areas of the Salton Sea means that localized episodes of significant windblown dust can go undetected. Staff of the Salton Sea Science Office recently photographed a localized but relatively intense dust storm along the south shore of the Salton Sea. Many of the accessible shoreline areas are disturbed by dune buggies and similar off-road vehicles, which would increase the wind erosion potential on exposed lakebed areas.
86.	Page 3.7-34		The discussion of impact AQ-7 mentions natural desert soils and vehicle travel on unpaved roads as the predominant sources of fugitive dust emissions around the Salton Sea. Natural desert soils typically have a low wind erosion rate; disturbed desert soils, on the other hand, can be a significant source of fugitive dust.
87.	Page 3.7-34		The dust situations at Owens Lake and Mono Lake provide insight into dust storm mechanisms under conditions where there are extensive deposits of sodium sulfate and sodium carbonate salts. They do not, however, provide a general indication of conditions required to produce windblown dust events. There are differences in climactic and soil conditions and other factors that could make the conditions at the Sea either worse or better than at either of these lakes. For example, the Salton Sea is generally more accessible to greater numbers of people than Owens Lake. If the exposed area were used for off-road vehicle use, surface crusts would be damaged and excessive dust could be created that would exceed conditions at Owens Lake. A more in-depth analysis of possible dust formation needs to be provided. It is important to recognize that salt deposits are not required to create a windblown dust problem. Any barren sediment or soil area with surface conditions susceptible to wind erosion can be a source of windblown dust. Phoenix gets periodic national news

R5-96 R5-97 R5-98 R5-99 R5-100 R5-101 R5-102

Response to Comment R5-97

Please refer to the Master Response on *Air Quality—Air Quality Issues Associated with Fallowing* in Section 3 of this Final EIR/EIS.

Response to Comment R5-98

Impact AQ-4 is no longer predicted to occur, so this comment is no longer applicable. Water for compliance with the IOP will not be produced through conservation measures.

Response to Comment R5-99

Please refer to the following Master Responses in Section 3 of this Final EIR/EIS: *Air Quality—Air Quality Issues Associated with Fallowing;* and *Air Quality—Emissions from Construction of Conservation Measures*.

Response to Comment R5-100

Please refer to the Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 3 of this Final EIR/EIS.

Response to Comment R5-101

Comment noted.

Response to Comment R5-102

Please refer to the Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 3 of this Final EIR/EIS.

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	Com No.	Page Number	Figure, or Table No.	Comment
R5-102				coverage for occasional massive dust and sand storms that originate in surrounding desert areas without the presence of anything like Owens Lake or Mono Lake If comparisons are going to be made to Owens Lake or Mono Lake, one of the important comparisons is the size of the area involved in producing dust storms. Although the total playa area at Owens Lake is about 100,000 acres, only about 30,000 acres (47 square miles) are involved in generating dust storms. More importantly, the area producing individual dust storm events is a small fraction of that 30,000 acres at any one time. The primary source of dust storms at Moro Lake is only about 5,000 acres, and individual dust storms arise from only limited portions of that area. Although it may take unusual circumstances (such as those at Owens Lake) to produce dust storms of regional significance, it does not take a huge area to generate localized dust storms.
R5-103	88.	Page 3.7-35		The discussion of soil chemistry and salt crusts has a serious error. Sodium salfate salts undergo the same type of mineralogical phase changes as do sodium carbonate and sodium bicarbonate salts. And sodium sulfate salts undergo these phase changes over a broader range of substrate temperatures than do the sodium carbonate and sodium bicarbonate salts. The localized dust storm photographed by staff from the Salton Sea Science Office appears to have been produced from a localized deposit of sodium sulfate salts. It is unclear whether that local area of salt deposits resulted from Salton Sea waters, general groundwater conditions, or localized geothermal conditions. But the high sodium sulfate content of Salton Sea waters is an indicator that there is the potential for localized deposits of highly erosive salts.
R5-104	89.	Page 3.7-35		Most of the threshold wind speeds mentioned in this discussion do not represent normal conditions. The typical threshold wind speeds identified by portable wind tunnel studies at Owens Lake and Mono Lake are 15 to 17 mph, which is consistent with most of the literature on wind erosion processes. Major dust storms typically involve stronger winds, but the wind erosion process is typically initiated at wind speeds of between 12 and 20 mph. Cemented soils or moist soils would exhibit threshold wind speeds of about 30 mph, but those would not be typical conditions. Moreover, most of the accessible shoreline areas around the Salton Sea show evidence of off-road vehicle activity, indicating that there is a significant potential for disturbance of exposed lakebed areas. The fact that PM_{10} standards are exceeded throughout the Salton Sea air basin is clear evidence that local wind speeds are high enough to initiate wind erosion processes.
R5-105	90.	Page 3.7-35		The discussion of recession rate issues is misleading in its implications that there will be extensive vegetation establishment on exposed lakebed area or the formation of extensive nonerosive salt crusts. Natural vegetation establishment is a slow process in desert areas and is even slower if soils or local groundwater are saline or alkaline. It is also uncertain if stable sand dunes should be expected in an area where there is off-road vehicle activity. Any such activity would further inhibit vegetation establishment and would rapidly destroy any stable salt or calcium carbonate crust that might form on exposed lakebed sediments.
R5-106	91.	Page 3.7-36		Mitigation measure AQ-7 is described as selecting and implementing HCP Approach 2. As noted, fallowing additional agricultural land and using the conserved water to maintain the level of the Salton Sea would avoid air quality impact AQ-7. Since HCP2 has been presented as an option in the HCP, it is not an infeasible option. Consequently, impact AQ-7 should not be categorized as unavoidable because it is an impact for which feasible and effective mitigation has been identified. Failure of the project proponent to implement identified and feasible mitigation measures should not be disguised by calling the impact "unavoidable."
R5-107	92.	Page 3.7-36		The third paragraph under mitigation measure AQ-7 suggests that IID negotiate a monitoring and mitigation plan with SCAQMD and ICAPCD. Monitoring may be an essential component of mitigation, but by itself monitoring does not mitigate anything. And saying that agencies should find a way to mitigate the problem is not

Response to Comment R5-103

Please refer to the Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 3 of this Final EIR/EIS.

Response to Comment R5-104

Please refer to the Master Responses on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* and *Air Quality— Wind Conditions at the Salton Sea* in Section 3 of this Final EIR/EIS.

Response to Comment R5-105

Please refer to the Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 3 of this Final EIR/EIS.

Response to Comment R5-106

Please refer to the Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 3 of this Final EIR/EIS.

Response to Comment R5-107

Please refer to the Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 3 of this Final EIR/EIS.

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	Com No.	Page Number	Figure, or Table No.	Comment
R5-107				mitigation either. Is there any commitment on the part of IID to actually develop the suggested agreement with SCAQMD and ICAPCD? Have any practical approaches to mitigating windblown dust been identified?
R5-108	93.	Page 3.7-37		The last sentence of the top paragraph (end of no project impact discussion) cross-references impact AQ-3. AQ-7 appears to be the more relevant impact discussion
R5-109	94.	Page 3.7-38		Mitigation A2-AQ-2 is essentially the same as mitigation AQ-7. The previous comments on mitigation AQ-7 apply to mitigation A2-AQ-2 also.
	95.	Page 3.7-39		Mitigation A3-AQ-2 is essentially the same as mitigation AQ-3. The previous comments on mitigation AQ-3 apply to mitigation A2-AQ-2 also.
R5-110	96.	Page 3.7-40		Mitigation A3-AQ-3 is essentially the same as mitigation AQ-7. The previous comments on mitigation AQ-7 apply to mitigation A3-AQ-3 also.
R5-111	97.	Page 3.7-41		Mitigation A4-AQ-1 is essentially the same as mitigation AQ-3. The previous comments on mitigation AQ-3 apply to mitigation A4-AQ-1 also.
R5-112	98.	Page 3.7-42		Mitigation A4-AQ-2 is essentially the same as mitigation AQ-7. The previous comments on mitigation AQ-7 apply to mitigation A4-AQ-2 also.
R5-113	99.	3.11-22		The discussion of Impact A-1 notes that "the exposed area (from the receded shoreline of the Salton Sea) would look like the existing beach and would eventually revegetate..." How long would it take for these 78 square miles of exposed Seabottom to revegetate? Not all of the current shoreline has positive aesthetic value; an increase of the proportion described in the EIS/EIR would result in vast expanses of unattractive salt flats. If revegetation is depended on to reduce the impact, there should be a discussion of such revegetation—how long would it take, would any local entities plant vegetation, and so forth.
R5-114	100.		Section 3.11	Aesthetic impacts in general appear to be limited to the changes perceived from scenic viewpoints and public roadways. While these are important elements of a visual analysis, local residents can also be considered sensitive receptors, and scenic viewpoints have little relevance in any discussion of odor impacts. The discussion should therefore include the visual impact on local residents, many of whom are low-income and/or minority (see EJ comments above), as well as the odor impacts on both local residents and visitors. Odor impacts would not be restricted to particular scenic viewpoints, of course, but would be endemic wherever Sea bottom would be exposed or individuals could approach the coastline.
R5-115	101		Section 3.11	The odor impact analysis is difficult to analyze, as the copy of the EIS/EIR on the CH2M Hill Web site appears to have about 12 blank pages in the middle of it. Thus it's difficult to determine whether analysis is missing.
R5-116	102	3.11-26		Odor impacts are substantially understated and should be considered adverse and significant. Odor impacts are presumed to be caused only by water quality problems increasing animal die-off and algae bloom. While these do in fact affect odor, another odor source is exposed Salton Sea sediments, which would be measurably greater under the proposed project than under the no action alternative. Additionally, the rapid decline and shrinkage of the Sea under the proposed action would cause all the fish in the Sea to die-off over a period of perhaps 10 to 15 years. During this same time frame, all nutrients and other constituents in the Sea would concentrate, probably by a factor of two or more, thus increasing the extent and number of algal blooms. In addition, because odor is such a subjective issue, the difference may be sufficient to cause controversy, which should be examined more closely. Therefore, the impacts to odor should be considered significant, unless additional analyses are provided to demonstrate otherwise.
R5-117	103.		Section 3.11	Odor impacts often depend on prevailing wind and weather conditions. In addition, particular areas of the Salton Sea have greater odor issues than others. This discussion should be amended to address possible seasonal variations in odor, particular if the water transfer project would effect seasonal variations in inflow to the Salton Sea. In addition, the Science Office Committee on eutrophication in the Sea concluded that loss of the fishery may increase algal activity. Therefore, accelerating the decline of

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Response to Comment R5-108

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.

Response to Comment R5-109

Comment noted.

Response to Comment R5-110

Comment noted.

Response to Comment R5-111

Comment noted.

Response to Comment R5-112

Comment noted.

Response to Comment R5-113

With the implementation of the Salton Sea Habitat Conservation Strategy, the elevation of the Salton Sea would not begin to decline until some time after 2030, and the ultimate elevation of the Sea under the Proposed Project in the year 2075 would be about -240 ft msl, reducing the surface area of the Sea by about 16,000 acres (about 25 sq. miles). Aesthetic impacts at this elevation are reasonably represented by the visual simulations in the Draft EIR/EIS shown for Alternative 4 (which had a projected Sea elevation of -241 ft msl). These aesthetic impacts are still considered to be less than significant. The determination of less than significant is not dependent on revegetation; however, any revegetation that may occur would reduce these impacts.

Response to Comment R5-114

Please see the response to Comment R5-113 with regard to visual impacts. Odor impacts are discussed in the response to Comment R5-6. Compared to the projected ongoing eutrophication of the Sea, the effect of the Proposed Project, with implementation of the Salton Sea Conservation Strategy, on odors is expected to be less than significant, as discussed in the Draft EIR/EIS. Consideration of environmental justice issues is not applicable to less than significant impacts. See the revised Environmental Justice section in subsection 3.15 under Section 4.2, Text Revisions, in this Final EIR/EIS.

Response to Comment R5-115

To improve document download times from the IID public web site, the aesthetics section of the EIR/EIS (Section 3.11) is posted on the web site in four separate sections (3.11a through 3.11d). The blank pages referenced in your comment are part of Section 3.11d and encompass Figures 3.11-5a through 3.11-5l. These figures were omitted from this section of the document because of file size constraints and are instead posted under the "Figures" heading on the same page of the website. To reduce confusion and facilitate web site access to these existing figures, a link to Figures 3.11a through 3.11l has been created and placed immediately beneath the Section 3.11d text. During examination of the website, no document text was determined to be missing from Section 3.11. In addition, it should be noted that complete hard-copy versions of the Draft EIR/EIS (containing all document text and figures) were also made available at local public libraries and hard copies and CD-ROMS were available by request from IID and the Bureau of Reclamation throughout the 90-day public comment period.

Response to Comment R5-116

See response to Comment R5-6.

Response to Comment R5-117

See response to Comment R5-6.

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			the fishery could increase algal activity and associated odors and could decrease the ability the restoration project to control eutrophication
104.		3.14.	The Salton Sea is a recreation resource for both visitors and residents, but these recreationists tend to be low income or minority. EO 12898 would require that recreation impacts be analyzed with an eye to the demographic and income makeup of the community in question. This has not been done. Additionally, aesthetic impacts should be evaluated in the light of EJ concerns. Low-income residents and recreationists of the Salton Sea would experience disproportionately the impacts to the aesthetic value of the Salton Sea (both visual and olfactory) . The aesthetic impacts on the Torres Martinez Tribe specifically should be addressed. The visual simulations indicate that 78 square miles of Salton Sea bed would be exposed as a result of reduced water flow into the Sea; this would have significant impacts on the aesthetic value of the Sea to local residents and recreationists, many of whom would be low income or minority.
105.		3.15 Environ-mental Justice	The assumption that all revenue from the transfer would go to the farm community has EJ consequences. Benefits of the program would go to farmers, while lower income residents near the Sea would bear the worst of the impacts. This factor needs to be included in the EJ section. The transfer EIS/EIR states that "all transfer revenues not spent by IID on water delivery system improvements, program administration, or environmental or mitigation measures pursuant to the final EIR/EIS or HCP will be passed on to participating farmers." This assumes that whether or not the IID pursues farm conservation measures or fallowing, no transfer revenue will go to the community at large. The effects of these payments going to one class of people compared to the community at large should be considered in the EJ section. Preferably the analysis would include alternatives that assume various shares of the transfer revenue being distributed to the community under farm conservation versus fallowing alternatives.
106.	3.15-3	Environ-mental Justice	There are no demographic breakdowns or income data provided in the EJ section. While EO 12898 does specify "minority and low-income," it would be helpful for reviewers to know the demographic and income-related breakdown of the community, in comparison with the greater community within the ROI.
107.		3.15.4.2, Salton Sea discussion	The EJ analysis focuses solely on fallowing leading to loss of jobs. What about the impact of reduced water levels in the Salton Sea, which would reduce tourism/recreation (the services industry is likely to be staffed by primarily minority/low income) as discussed in the socioeconomics section? The Draft EIS/EIR for the Salton Sea Restoration Project identifies an EJ impact from the no action alternative deriving from the loss of recreation related jobs. This document does not presume the Salton Sea Restoration Project would be implemented; therefore, it is logical that EJ impacts would be aggravated by this proposed project.
108.		3.15.4.2, Salton Sea discussion	The EJ analysis also doesn't mention the impact of reduced fishing opportunities for low-income recreationists and low-income residents who eat fish from the Salton Sea. Reduced inflow into the Salton Sea would damage the fishery through the increase in salinity, particularly if the Salton Sea Restoration Project were not implemented (as assumed by this analysis). This would have significant adverse impacts on the Sea's ability to sustain a fishery, and thus on the opportunities for local residents and visitors to catch fish that are safe to eat.
109.		3.15.4.2, Salton Sea discussion	The analysis indicates that fallowing would inevitably lead to a loss of jobs, but the EIS gives no indication of what type of jobs would be lost and under which circumstances.
110.		3.15.4.2, Salton Sea discussion	The EIS claims effects "would generally impact all communities along the shoreline in an equal fashion" and therefore would not implicate EJ concerns. This argument seems flawed. A significant percentage of the shoreline of the Salton Sea is occupied by minority or low-income communities. The impact to each minority or low-income resident along the shores of the Salton Sea is not greater than the impact to each

R5-117 R5-118 R5-119 R5-120 R5-121 R5-122 R5-123 R5-124

Response to Comment R5-118

The purpose of the environmental justice analysis is to determine whether or not disproportionately high and adverse human health or environmental effects of the Proposed Project or Alternatives are likely to fall on minority and/or low-income populations. This analysis focuses on the locations of high and adverse impacts (as reported in the various environmental analysis sections of the Draft EIR/EIS) and examines the racial and income characteristics of the populations affected by these impacts. As reported in the Draft EIR/EIS, aesthetic impacts were not determined to be significant (i.e., high and adverse). And, as reported in this Final EIR/EIS, the only significant impact related to recreation in the Salton Sea subregion, impacts to the sport fishery, will be mitigated to a less than significant level (see Master Response on *Recreation—Mitigation for Salton Sea Sport Fishery* in Section 3 in this Final EIR/EIS.)

In addition, the environmental justice section of the previous Draft EIR/EIS has been revised. This change is indicated in this Final EIR/EIS in subsection 3.15 under Section 4.2, Text Revisions. The revised section discusses the disproportionate impacts to minority and low-income populations from impacts that were determined to be high and adverse.

Response to Comment R5-119

The precise distribution methods and recipients of transfer revenue payments have not been determined by the IID Board of Directors. Indeed, the IID Board of Directors is free to voluntarily distribute such payments as part of the program implementation. The assumption made in IMPLAN PRO in Section 3.14 of the Draft EIR/EIS with regard to the receipt of transfer revenue payments by farmers was made for modeling purposes only.

Response to Comment R5-120

In response to comments, the text of Section 3.15 has been revised. The changes are indicated in subsection 3.15 in Section 4.2, Text Revisions in this Final EIR/EIS.

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Response to Comment R5-121

Refer to the Master Responses on *Biology—Approach to Salton Sea Habitat Conservation Strategy and Recreation—Mitigation for Salton Sea Sport Fishery* in Section 3 of this Final EIR/EIS. In addition, the construction activities associated with the HCP and the Project's mitigation measures will create jobs in the Salton Sea and IID water service area subregions.

Response to Comment R5-122

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

Response to Comment R5-123

Section 3.14, Socioeconomics, in the Draft EIR/EIS contains information about the job sectors that would be effected if fallowing was implemented for conservation of water under the Proposed Project or alternatives.

Response to Comment R5-124

In response to comments, the text of Section 3.15 has been revised. The changes are indicated in subsection 3.15 in Section 4.2, Text Revisions in this Final EIR/EIS.

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R5-124				nonminority resident, but the impact felt by the minority community *as a whole* is greater than the impact to the nonminority community as a whole. The document should address impacts on the Torres Martinez Tribe specifically, whose members are disproportionately of lower income households.
R5-125	111.		3.15.4.2, Salton Sea discussion	The area around the Salton Sea is heavily minority and low income, in comparison to other communities in the overall ROI, which extends from the Colorado River to San Diego County. These demographic distinctions should be recognized in the EIS and impacts analyzed to account for EJ issues The scale of this project is large enough that it could be argued that the Salton Sea /Imperial Valley area is receiving all the environmental damage of a project that primarily benefits the San Diego area. The demographic differences between the Salton Sea and Greater San Diego should not be glossed over, as this is precisely the sort of situation EO 12898 was designed to address.
R5-126	112.		3.15.4.3, 3.15.4.4, 3.15.4.5, 3.15.4.6	Salton Sea discussions do not acknowledge the impact of the reduced water flow to the Salton Sea. Again, the implication is that the only impacts of interest are fallowing and loss of farm employment, but there are impacts as a result of the reduced Sea elevation deriving from changes in recreational opportunities, loss of fishery resources, increased odors, aesthetic impacts, and decline of property values.
R5-127	113.	Chapter 5	Cumulative Impacts/ Hydrology	It is not clear, in some cases, which related projects have been accounted for in the EIR/EIS under existing conditions (presumably anything implemented through 1999), or the baseline, presumably any projects that have been implemented since the end point for existing conditions but prior to the implementation of the IID/SDWCA transfer project. For example, it is not clear how the EIR/EIS accounts for the transfers and conservation measures in the 1988/89 IID/MWD transfer agreements (see general comments).
R5-128	114.	5-14	Cumulative Impacts	The cumulative impacts section implies that because no specific restoration measures have been identified for the Salton Sea Restoration Project, "any conclusions regarding potential cumulative impacts would be speculative." This appears to be an overstatement; as of April 2002, the Salton Sea Restoration Project EIS/EIR is at the public draft stage, and therefore the project itself should be considered reasonably foreseeable, even if specific measures have not been identified as yet. CEQ guidelines say that "cumulative impacts" include incremental impacts of the proposed project "when added to other past, present, and reasonably foreseeable future actions..." (40 CFR 1508.7). Under this definition, the water transfer EIS/EIR should consider the incremental effect of the proposed project on the Salton Sea restoration, inasmuch as the more probable elements of the Salton Sea Restoration Project can be identified. One of the major issues in the Salton Sea restoration is the level of salinity in the Sea, which influences the feasibility and cost of the restoration effort. Any reduction in inflow to the Salton Sea as a result of the water transfer project would inevitably have an adverse impact on the restoration project and the survival of the Salton Sea fishery. A significant reduction in inflow would increase salinity to the point that the Restoration effort would require purchasing more water to reduce salinity or implementing other highly expensive methods to reduce salinity sufficient to keep the fishery alive. (See the *Assessment of Salinity and Elevation Control for Varied Inflow* [Salton Sea Authority 2002] for a detailed discussion.) Additionally, the life of the Salton Sea fishery depends on maintaining the delicate balance between inflow and evaporation. If inflow were reduced, evaporation would outstrip inflow, salts would be concentrated, and the fishery would be threatened. Cumulative impacts of the proposed project, therefore, should reflect how the reduced inflow to the Salton Sea would adversely affect the Salton Sea Restoration Project and the fishery (and habitat) it is designed to preserve.

Response to Comment R5-125

In response to comments, the text of Section 3.15 has been revised. The changes are indicated in subsection 3.15 in Section 4.2, Text Revisions in this Final EIR/EIS.

Response to Comment R5-126

Executive Order 12898 was designed to address only high and adverse impacts. The previous Draft EIR/EIS has been revised to reflect this concern. This change is indicated in this Final EIR/EIS in subsection 3.15 under Section 4.2, Text Revisions in this Final EIR/EIS. Also, see Master Response on *Socioeconomics—Property Values and Fiscal Impact Estimates* in Section 3 in this Final EIR/EIS.

Response to Comment R5-127

Please refer to the Master Response on *Hydrology—Development of the Baseline* in Section 3 of this Final EIR/EIS.

Response to Comment R5-128

Refer to the Master Response on *Other—Relationship Between the Proposed Project and the Salton Sea Restoration Project* in Section 3 of this Final EIR/EIS.

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R5-129	115.	5-14	Cumulative Impacts	A more complete discussion of cumulative impacts of the transfer project with the Salton Sea Restoration Project should be provided. The cumulative impact section states that there would be no cumulative impact because the individual impacts on water quality, air quality, or hydrology would be "less than cumulatively considerable." However, as noted in the CEQ guidelines, cumulative impacts "can result from individually minor but collectively significant actions taking place over a period of time." A 110 KAFY reduction in inflow to the Salton Sea over 75 years, during which period the Salton Sea Restoration Project would be underway, could have a significant impact on water quality in the Salton Sea, hydrology in the general area, and air quality as a result of exposed bottomland in the Sea and the interaction between the reduced inflow and the restoration project.
R5-130	116.	5-49,	Section 5.6.1	The discussion of irreversible commitment of resources is inadequate. Under recent historic inflows or even the baseline proposed in the document, the Salton Sea could be restored. Under the proposed action for the transfer program, the Sea would deteriorate so rapidly and severely that there is little likelihood that a restoration program would be feasible. The unique habitat with its life forms that are specially adapted to high saline conditions of the Sea would be lost. The food source for the millions of fish-eating birds that use the Sea as a food source would be lost. Salinity of the Salton Sea can be controlled by using one of several methods to remove salty water, evaporate the water, and dispose of the salt residue. The least expensive of these methods appears to be on-land solar ponds. Solar ponds at the Salton Sea would be similar to the evaporation ponds that are used to produce salt in San Diego Bay, San Francisco Bay and at the Great Salt Lake. While solar ponds on land would be the least expensive, constructing ponds on land would not assist in maintaining the water surface elevation, if the inflow to the Sea is reduced in the future. Constructing solar ponds within the Sea would help maintain water surface elevation but would be significantly more expensive than on-land ponds. In-Sea ponds would reduce the evaporative surface area of the Sea and thus would compensate for reduced inflow. With a reduced surface area, a new balance between inflow and evaporation could be achieved without a decline in elevation. For historic inflows, an on-land solar pond system could be constructed to reduce the salinity to about 43,000 mg/L in 30 years, with about a five foot drop in elevation. The cost of this action, could be less than $250 million. With the addition of some in-Sea ponds, salinity could be reduced to 40,000 mg/L and elevation could be maintained at –230 feet msl, just three feet below the Sea's current level, for about $400 million. Under the proposed transfer project, the shrinking Sea would cause the salts to concentrate. To understand how this would happen, consider the top five to six feet of the Sea, which contain about 100 million tons of salt. If the Sea were to drop by just five or six feet, these 100 million tons would concentrate in the remaining waters of the Sea. The proposed action for the transfer project would cause the Sea to drop over 15 feet. The rate of rise in salinity would increase by more than a factor of about five. In other words, instead of rising by one part per thousand over four years, it would rise that much in less than a year. With the baseline condition in the transfer EIS/EIR, salinity and elevation can still be controlled, but it would be more difficult and more expensive. The draft EIS/EIR suggests that under this inflow condition, the elevation in the Sea would ultimately drop about 7 feet, and about 25 square miles of sediments would be exposed. With the proposed action, the average inflows to the Sea would be reduced to 0.93 million acre-feet per year, compared to the present inflow of 1.34 million acre-feet

Response to Comment R5-129

The cumulative impact analysis did not find any new significant impacts that are not already significant impacts of the Proposed Project by itself. Implementation of the HCP, and other mitigation measures set forth in the Draft and Final EIR/EIS, will reduce Proposed Project-related significant impacts to a level that is less than cumulatively considerable. Significant, unavoidable impacts will, however, remain significant and unavoidable. For additional information on the relationship between the Proposed Project and the Salton Sea Restoration Project, refer to the Master Response of that title. For a response to the request for a cumulative impact analysis of the Project and the Salton Sea Restoration Project, refer to the response to Comment R5-128 above.

Response to Comment R5-130

Section 5.6.2, Irreversible Commitments of Resources, in the Draft EIR/EIS recognizes that the primary area that would experience the most likely irreversible change is the Salton Sea and the lands adjacent to the Sea. With implementation of the water conservation and transfer component of the Proposed Project and/or alternatives, the surface elevation of the Sea would decrease and salinity would increase more rapidly than under the No Project Alternative after 2030. Such environmental effects would adversely affect the environmental resources associated with the Salton Sea irreversibly. For additional information on the relationship between the Proposed Project and the Salton Sea Restoration Project, refer to the Master Response of that same title. The comment makes the unsupported assertion that the Proposed Project would cause the Salton Sea to deteriorate so rapidly and severely that the restoration project would become infeasible. This ignores the fact that the recent Restoration Planning Update reports that under the current salinity trend (without projects), fishing collapse will begin as early as 2015. It also plans to assume that the entire maximum amount of transfer of 300 KAFY will begin immediately. In fact, the transfer quantitatively ramp up. Refer to Section 2.2.4.1 of the Draft EIR/EIS for a detailed explanation.

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			per year. At this inflow level on-land evaporation pond systems would not be effective in controlling salinity. Even with very large systems, occupying over 100 square miles, the peak salinity would exceed 60,000 mg/L, which would cause at least a temporary loss of the fishery. Eventually the salinity level could be returned to a healthy level for fish, but the Sea would shrink by more than a third in area and by two-thirds by volume. The Sea elevation would drop about 20 feet without any restoration actions, and with on-land ponds, it would drop about 30 feet. About 140 square miles of bottom sediments would be exposed to possible wind erosion. An in-Sea pond system could control salinity at an estimated present value of nearly $2 billion, but there would be an 18-foot drop in elevation. With additional in-Sea ponds, salinity could be reduced to 40,000 mg/L and elevation could be maintained at –230 ft, msl, but the present value cost would rise to about $3.4 billion. At this level, the in-Sea construction project would become so large that a number of technical and environmental issues would render it at least impractical and possibly infeasible. Whether restoration costs start at $250 million or $500 million or some other amount, reduced inflows have a dramatic effect on restoration costs; a Sea that is made smaller and saltier is very difficult to restore. That difference between restoring the Sea under current inflows and restoring the Sea under reduced inflows is staggering. Put another way, the impact of reducing inflows on restoration costs range between $200 and $300 per acre-foot of water reduced per year. The EIR/EIS makes little allowance for accounting for this incremental impact. There is some discussion about applying the estimated costs for the proposed project's habitat conservation plan, assumed in the transfer EIR to be between $350 million and $800 million, to the restoration project, if a restoration project is authorized. More recent estimates of the proposed project's environmental costs have been quoted in the low one hundred million dollars. Federal legislation has been introduced to fund the environmental costs associated with the proposed project; the legislation caps those costs at $60 million (refer to H.R. 2764, Colorado River Quantification Settlement Facilitation Act) and provides a mechanism to apply that funding to restoring the Sea, if restoration is authorized. Whether the proposed project's contributions or legislative financial contributions to restoration are $60 million or $160 million, if the proposed project's impact on the Sea is well over $1.5 billion, who will pick up the difference? At this time it unlikely that Congress and the State of California are willing to fund a multibillion dollar restoration project. Even if the federal and state governments fund such a project, restoration is unlikely under a significantly reduced inflow scenario. It will take time to marshal the necessary massive authorizations and appropriations from government. And it will take time to design and permit an enormous project, as described above, to address a Sea that is becoming much smaller and saltier requires ever larger restoration responses. And it will take time to build a large, complicated project and probably to do so in the deepest, most expensive, and most seismically risky areas of the Sea. Even if all of the political and financial support were available within a few years, it is unlikely that restoration could occur in time to preserve a fishery at the Sea and the values that the fishery supports. These facts should be addressed and either fully mitigated or acknowledged as irreversible commitments of resources.
117.	Appendix F	SSAM, Table 4.2	Table 4.2 in the SSAM report in Appendix F contains a column headed "Inflow Reduction Due to Entitlement Enforcement," with 56.856 KAFY deducted each year beginning in 2000. The footnote for this column says that this value was provided by IID. The development of the deducted value should be discussed in the text. A

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R5-131

Response to Comment R5-131

Please refer to the Master Response on *Hydrology—Development of the Baseline* in Section 3 of this Final EIR/EIS.

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R5-131			reduction by 56,856 KAFY in the amount of agricultural drainage to the Salton Sea implies a larger reduction in the diversion from the Colorado River or some methods of conservation that are not discussed. Also, the beginning year of 2000 seems inappropriate because it is already 2002. Are these the actual values for 2000 and 2001 or are they out-of-date projections? This issues should be clarified or corrected in the text.
118. R5-132	Appendix F	Figure 3.1-30; Table 4.2 of SSAM; and Figure 3.1-16	The average values shown in Figure 3.1-30 do not correspond very closely to average values reported in Table 4.2 of the Salton Sea Accounting Model (Appendix F). For example, Table 4.2 indicates that the average combined net baseline discharge from Mexico and IID would be 1,154 KAFY. Figure 3.1-30 shows the average net inflow from Mexico, groundwater, IID drains, and the New and Alamo Rivers, as 1,100 KAFY. The difference is 54 KAFY. If Figure 3.1-30 were derived from the average values in Table 4.2, then it would appear that the "Inflow Reduction Due to Entitlement Enforcement" in Table 4.2 must account for the difference in the inflows to the Sea shown on Figure 3.1-30 versus those in Table 4.2. If the amounts shown in Figure 3.1-30 are actually based on the model results in Table 4.2, then losses due to evaporation and phreatophyte use applied to the inflow from Mexico must account for about 8.4 KAFY. Removing the Mesa Storm Inflows and the inflow from Mexico (and its portion of the evaporative losses), the net discharge to the Salton Sea derived from surface drain discharge from IID is about 916 KAFY. This represents about 32.7 percent of the water measured at Lateral 5 (2,803 KAFY). Comparison of figures 3.1-16 and 3.1-30 indicates that 52 KAFY less water on average are assumed to be delivered to the AAC under the baseline than under existing conditions. The figures indicate that this would reduce drainage to the Salton Sea by 49 KAFY. Thus, the figures imply that the reduced delivery expected under the future baseline results in nearly a one-to-one reduction in discharge to the Salton Sea. Based on Figure 3.1-30, drainage to the Salton Sea represents about 33 percent of the deliveries at Lateral 5 under the baseline (see previous comment). If this is the case, then a decrease in deliveries of 52 KAFY should result in a reduction in drainage to the Salton Sea of 17 KAFY, not a reduction of 49 KAFY. In any case, the entitlement enforcement should be better defined.
119. R5-133	Apperdix F	SSAM, Table 4.2; Table 3.1-16	In Table 4.2, the column headed "Baseline Aquifer Flows from CVWD" contains negative values averaging –2.45 KAFY. A negative value here has the effect of reducing the volume of the Sea, so it appears that the assumption is made that there is salt water intrusion to the aquifer from the Sea in this amount. The magnitude of the aquifer flows appears to be inversely proportional to the value of the CVWD baseline discharge to the Sea. This suggests that, as the CV aquifer is drawn down by pumping, not only does the amount of water pumped from the aquifer decrease, but the inflow from the aquifer increases. CVWD apparently provided the values used in the model. Additional explanation for the derivation of these numbers should be provided in the EIR/EIS.

Response to Comment R5-132

Please refer to the Master Response on *Hydrology—Development of the Baseline* in Section 3 of this Final EIR/EIS.

Response to Comment R5-133

Tables 4.1 and 4.2 of Appendix F make no inferences and/or conclusions about the amounts of water pumped from the Coachella Aquifer. The best available information, provided by CVWD, was used for this analysis. Additional information is not available to IID or the Reclamation relative to Baseline discharges to the Salton Sea by CVWD.