

L1-66

The DEIS should address the potential for reducing water use through reducing evaporation, rather than just reducing seepage.

10. The discussion in the DEIS of why the Salton Sea would not become emissive due to the water recession increasing the exposed area of the lakebed is based on unverified assumptions and some erroneous data. Exposed shoreline at the Salton Sea has the potential to result in an emissive area as seen at Owens Lake and Mono Lake. As stated in the discussion on page 3.7-34 of the DEIS, the proposed project would expose 50,000 acres (78 mi²) of currently submerged lakebed bottom. This compares to an Owens Lake total area of 110 mi² with an emissive area of 35 mi². Thus, the area being exposed by the proposed project is only slightly less than the area of Owens Lake.

Three reasons are given in the DEIS on page 3.7-35 as to why the exposed areas of the Salton Sea would not create an emissive source like Owens Lake or Mono Lake: 1) the soil chemistry is different than that at Mono or Owens Lake, 2) wind speeds at the Salton Sea are less than Mono or Owens Lake, and 3) the recession rate is slower than that of Owens or Mono Lake. As discussed below, some errors in the provided data, and some generalizations do not provide sufficient assurance that the exposed shoreline will not generate dust storms in the area. This section fails to substantiate the premise that the Owens and Mono Lake experiences will not be repeated at the Salton Sea.

L1-67

Although the salts and soils at the Salton Sea may not contain as much carbonate as the salts and soils at Mono and Owens Lake, the salts and soils do contain substantial amounts of sulfate and some carbonate salts as well. The conditions exist at the Salton Sea to allow an unstable salt crust to form from sulfate salts. When some sulfate salts form crust at temperatures below 60°F, an unstable form of the salt is produced. Although the surface temperature is more moderated than the air temperature, the air temperature at the southern end of the Salton Sea is below 60°F roughly 25% of the time, based on data from the Salton Sea East (#128) California Irrigation Management Information System (CIMIS) meteorological station. Any precipitation when the surface temperatures fall below 60°F during the year would produce conditions conducive to forming unstable sulfate salts. The DEIS should address the specific salts at the Salton Sea to evaluate emissivity, rather than to simply claim that, because they are different from the salts at Owens Lake, they are not likely to form an emissive crust.

L1-68

11. The meteorological data that was presented in the DEIS and used to assert that wind speeds near the Salton Sea can not result in wind storms was incorrect and incomplete. The wind data that was used and included in the DEIS were the CIMIS Salton Sea West (#127) and Salton Sea North (#154) sites. These sites are not representative of where the

Response to Comment L1-67

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 L1-68

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

greatest shoreline exposure will occur. This is discussed further below. Moreover, the wind data presented in the DEIS for the Salton Sea North (#154) site are clearly incorrect. The County's consultant, ENVIRON, obtained data from the California Irrigation Management Information System (CIMIS) and prepared wind roses for comparison to those found in the DEIS. A comparison of the two sets of wind roses can be found in Attachment A (ENVIRON's data) and Attachment B (DEIS data). For comparison, those from the DEIS are in Attachment D. The DEIS should correct the meteorological data that is presented.

L1-68

12. As noted above, the meteorological data presented in the DEIS is not representative of meteorological data that will be the most important when considering impacts on the newly exposed shoreline at the Salton Sea. Over three-quarters of the potentially exposed shoreline around the Salton Sea lies within Imperial County, and the bulk is at the southern and south-eastern end of the Salton Sea. As a result, wind data from the Salton Sea East (#128) site near Niland would be the most representative for understanding whether there would be high winds that could create dust storms. Niland is also the closest Imperial County PM10 monitor to the Salton Sea, and is aligned with the predominant winds that would advect dust from the Salton Sea to the PM10 monitor. The DEIS should include this data in its analysis and discussion.

L1-69

13. The DEIS discussion on wind speed threshold velocities on page 3.7-35 is incomplete. The discussion compares threshold velocities with hourly average wind speeds measured at various monitoring sites. The relevant data to consider is wind speed gusts that may take place over periods far shorter than one hour. The DEIS should consider data on wind speed gusts in its discussion of threshold velocities and the potential for emissions from the newly exposed shoreline.

L1-70

14. The DEIS contains several apparent errors in its discussion on the meteorology in the area near the Salton Sea on page 3.7-14. The amount and timing of data reported available for the two sites appear to be incorrect according to our database. In addition, we found many more hours with wind speeds greater than 7 m/s than was reported in the DEIS. The wind monitor anemometer height stated in the DEIS (366 cm) is different than the one stated on the CIMIS website (2 m = 200 cm). Finally, as noted above, the wind rose for the #154 Salton Sea North site given in Figure 3.7-5 is incorrect. The errors in the wind speeds reported, the error in anemometer height, failure to use the Salton Sea East (#128) winds combined with an overstatement of the threshold wind velocity needed for dust suspension all bias the results toward understating a potential new PM10 emission sources. The DEIS should correct the discussion of the meteorology and revise its evaluation of the impacts of winds in potential new PM10 sources.

L1-71

Response to Comment L1-69

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

Response to Comment L1-70

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

Response to Comment L1-71

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

- L1-72
15. The DEIS's third argument for why Salton Sea would not become another Owens Lake involves the argument that the recession rate of the Salton Sea will be much slower (only 20% as fast) than for Owens Lake that went "dry" over several years. However, when Mono Lake recessed over a longer time its exposed shoreline was emissive and caused violations of the PM10 standard. Thus, based on recession rate, the Mono Lake situation is comparable to what the proposed project will do to the Salton Sea. The DEIS should revise its discussion on the relationship between recession rate and the potential to form emissive surfaces.
- L1-73
16. As noted above, contrary to what is stated in the DEIS, the information available in the DEIS is insufficient demonstrate that the air quality impacts can be mitigated to a level of insignificance, based on the assumptions in the DEIS. If the air quality impacts can not be mitigated to a level of insignificance, then the air quality in Imperial County may be degraded and public health will be impacted.

ENVIRON INTERNATIONAL CORP.

EIRComments-Attachment A

Response to Comment L1-72

Emissive surfaces and recession rates will be studied as part of the Monitoring and Mitigation Plan. Also, 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 L1-73

Please refer to the following Master Responses in Section 3 of this Final EIR/EIS: *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan*, *Air Quality—Health Effects Associated with Dust Emissions*, and *Air Quality—Consistency with the State Implementation Plan for PM10*.

Attachment B

COMMENTS ON THE SOCIOECONOMIC SECTION OF THE DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT FOR IMPERIAL IRRIGATION DISTRICT WATER CONSERVATION AND TRANSFER PROJECT AND DRAFT HABITAT CONSERVATION PLAN

**BY ECONOMICS RESEARCH ASSOCIATES
April 24, 2002**

Economics Research Associates (ERA) has been retained by Imperial County to conduct an investigation of the socio-economic impacts of the proposed IID-SDCWA water transfer. This report presents the results of ERA's initial review of documents pertaining to the proposed transfer of water from IID to SDCWA in the form of comments on the Draft EIR/EIS.

Summary Comment

(1) The overriding conclusion ERA has reached from review of the Draft EIR/EIS is that the socioeconomic sections (Section 3.14 and Appendix G) have valiantly attempted to define the impacts from a proposed water transfer plan that is poorly defined. Socioeconomic impacts are projected to range from significantly positive to significantly negative without being able to be precise about even the direction, let alone the magnitude, of the impacts. As described in the comments below, ERA concludes that the most positive end of the range is unachievable. In summary, ERA finds the Draft EIR/EIS to be inadequate in its analysis of socioeconomic impacts, but this is due primarily to an inadequate definition of the water transfer plan rather than any defect in analysis methods. Notwithstanding the competence of the analysis of impacts on jobs and incomes, however, the Draft EIR/EIS also stops short of an adequate treatment of the fiscal impacts that will be felt by Imperial County and the municipal jurisdictions within the county.

Specific Comments on the Draft EIR/EIS

(2) According to the Draft EIR/EIS analysis the aggregate socioeconomic impacts of the proposed action could produce 250 additional jobs or could cause the loss of 2,460 jobs (Tables 3.14-10 and -11). There is a significant difference between these outcomes. This range of continuing uncertainty indicates an inadequate treatment of the subject to date.

(3) IID policy is to make water available for transfer without any fallowing, through development of on-farm and system conservation measures. The stated plan is to use payments received for water transferred to pay for the physical improvements required to install and operate the conservation measures. Prices scheduled to be paid by SDCWA should be sufficient to pay for these improvements if the funds are directed properly. Under the terms of the QSA, however, CVWD and MWD are able to pay lower amounts for water. As was demonstrated on pages 4 and 5 of the CIC Research review of the Draft EIR/EIS, these payments are not sufficient to fund the

Response to Comment L1-74

Refer to the Master Response on *Socioeconomics—Property Values and Fiscal Impact Estimates* in Section 3 of this Final EIR/EIS.

Response to Comment L1-75

The specific conservation methods to be implemented under the Proposed Project have not been determined. As noted in the Draft EIR/EIS in Section 2.2.3.1, the conservation program could include a potentially broad and varying range of conservation measures to provide maximum flexibility to the IID Board to adopt the program to changing circumstances, methods, and participants over the lengthy Project term. Assumptions were made for modeling purposes that would capture the full range of potential impacts. The impacts of the conservation program ultimately adopted will fall somewhere within this range. The beneficial and adverse impacts of the Proposed Project and Alternatives are included in the Draft EIR/EIS in Section 3.14, Socioeconomics.

Response to Comment L1-76

The EIR/EIS presents the type and magnitude of estimated third-party socioeconomic impacts associated with the Proposed Project and each alternative evaluated in the EIR/EIS. As described in the Draft EIR/EIS, depending on the eventual implementation of the water conservation program, there could either be beneficial or adverse impacts to the regional economy. If water is conserved using on-farm and water delivery system improvements, it is anticipated that there would be beneficial effects to regional employment; therefore, there would not be any adverse effects to mitigate. If fallowing is used to conserve all or a portion of the water to be transferred, there would be adverse effects to the regional economy and farm workers as identified in the Draft EIR/EIS.

The IID Board will consider whether to implement socioeconomic mitigation measures when it considers whether to approve the Proposed Project or an alternative to the Proposed Project.

needed improvements. As a consequence, the Proposed Project is economically infeasible. If the Proposed Project has no chance of being implemented, it is inadequately defined.

L1-76

(4) The proposed transfer plan states that SDCWA and the other water agencies may take "up to" certain amounts of water per year. There is no guarantee, however, that the water will be transferred. This in turn implies that the revenue to IID from transferring water is also not guaranteed. Without a guaranteed income stream, third-party financing of on-farm or system conservation infrastructure will be impossible out of cash flow. The most likely response will be a "pay as you go" strategy, where farmers will fallow land and stockpile cash from payments for a number of years until sufficient funds are accumulated to start installing conservation measures. The no-fallowing policy of IID is thus unattainable, and the positive economic impacts of developing and operating conservation infrastructure will be reduced by the negative economic impacts resulting from fallowing. The net socioeconomic impact remains unknown without a more adequate plan, and could be positive or negative.

L1-77

(5) The socioeconomic analysis assumes that all transfer funds not utilized by IID for conservation or environmental mitigations will be paid to farmers. Of the after-tax income realized by farmers, 50% is assumed to leak out of the county and 50% is assumed to be spent locally, further generating multiplier expansion effects (pages 3.14-13 and G-12). No justification is given for this 50%/50% assumption. In the case where on-farm and system conservation improvements are made, there may not be a significant amount of funds left over for farmer discretion, but in the cases of all fallowing, the majority of transfer funds become subject to this 50%/50% assumption. A 10%/90% or 90%/10% alternative assumption could generate dramatically different economic impacts. If fallowing is to be allowed in the transfer plan, further analysis will be needed to more accurately model farmer use of the income gained through transfer payments to adequately estimate impacts in the Final EIR/EIS.

L1-78

(6) In the cases of fallowing, the Draft EIR/EIS analysis assumes crops will be fallowed in proportion to the historical pattern of crops grown in the valley. The CIC Research review notes that selectively fallowing fields by type of crop based on water consumption and crop value could be used to mitigate some of the socioeconomic impacts. In other words, instead of historical ratios of crop types, value/acre or labor(jobs)/acre could be used to make fallowing decisions. Such possible mitigation strategies are complicated by the practice of crop rotation in the valley whereby virtually all crops are grown on all fields at different times, and by the resource management need to fallow on occasion. Left to their own decision-making, farmers would be more likely to fallow based on profit/acre or profit/acre-foot of water, which may or may not be correlated with jobs/acre and could lessen or magnify adverse economic impacts.

L1-79

Fiscal Impacts

(7) Over the long run, fallowing will reduce property values. Even temporary fallowing programmed into crop rotation will reduce income derived from a field, ultimately reducing its value as farmland. Permanently fallowing a field will dramatically reduce its value. Perhaps farmers will be adequately compensated for reduced farm

L1-80

Response to Comment L1-77

See response to Comment L1-75.

Response to Comment L1-78

As described in Appendix G to the Draft EIR/EIS, IID has indicated that the on-farm portion of the water conservation program will involve contracts with landowners. IID estimated that 37 percent of the farmland within the IID water service area is owned by out-of-county residents. In addition to considering leakage of transfer revenues to out-of-county landowners, it is reasonable to assume that the transfer revenues will be used to pay down existing debt and accumulate savings. In order to avoid overestimating the beneficial impact to the regional economy of transfer revenue expenditures, it is reasonable to assume a 50-percent reduction in after-tax transfer revenues when estimating disposable income levels for the impact analysis.

Response to Comment L1-79

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 L1-80

Refer to the Master Response on *Socioeconomics—Property Values and Fiscal Impact Estimates* in Section 3 of this Final EIR/EIS.

values through transfer payments, but the community at large will also suffer through a reduction in property tax revenue. School districts, municipalities, and Imperial County will be the hardest hit by declining revenues. The reduction in fiscal revenue was not adequately treated in the Draft EIR/EIS.

L1-80

(8) The EIR/EIS identifies a potential job loss of 1,400 due to transfer and conservation by following, even before considering the additional job losses associated with following for IOP impacts, HCP impacts within the IID water service area, and the economic decline of the Salton Sea area. Socioeconomic impacts cannot be fully measured by just the loss of jobs affecting those who were formerly employed. The entire community in Imperial County will bear some increased burden through the governmental costs of providing job training and public assistance payments, and potentially through the costs of dealing with increased crime, domestic stress, and other social problems derived from high unemployment. The Draft EIR/EIS ignores this set of socioeconomic impacts.

L1-81

(9) Any reduction in air quality will have socioeconomic costs as well as environmental costs. The household sector of the economy will suffer costs associated with health problems and costs of mitigating airborne particles in their homes and workplaces. The public sector will suffer reduced revenues from declining property values, and increased costs of public health. These costs have not been adequately treated to date in the Draft EIR/EIS.

L1-82

Response to Comment L1-81

A discussion of the fiscal impacts directly related to unemployment is provided in the Master Response on *Socioeconomics—Property Values and Fiscal Impact Estimates* in Section 3 of this Final EIR/EIS. The indirect effects of unemployment mentioned by the commenter are not addressed because they are uncertain and speculative.

Response to Comment L1-82

Refer to the Master Responses on *Air Quality—Health Effects Associated with Dust Emissions*, *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan*, and *Socioeconomics—Property Values and Fiscal Impact Estimates* in Section 3 of this Final EIR/EIS.

Documents Reviewed

Ch2M Hill, "IID Water Conservation and Transfer Project/Draft Habitat Conservation Plan: Draft EIR/EIS, Sections 1, 2, 3.6, 3.14, Appendix G."

CIC Research, Inc., Independent Analysis of the Economic Impact Studies in the IID Water Conservation and Transfer Project EIR/EIS, Draft March 15, 2002.

Cordova, Ralph Jr., Yeager, Joanne L., McLaughlin, Bryn C., Rossmann, Antonio, Moore, Roger B. "Policy Statement of Hank Kuiper, Chair Imperial County Board of Supervisors", April 2002.

Dornbusch Associates, "Evaluation of IID Grower Market Power," February 20, 2002, (and written testimony of James P. Merchant).

Eckhardt, Dr. John, and Harnish, Laura, "Written Testimony in Support of IID-Authority Joint Long-Term Transfer Petition, to the State Water Resources Control Board."

Gomez, Santos and Steding, Anna, "California Water Transfers: An Evaluation of the Framework and A Spatial Analysis of the Potential Impacts." Pacific Institute, April 1998.

Horvitz, Steve, "Written Testimony for California State Water Resources Board Hearing Regarding Salton Sea."

Loh, Penn and Steding, Anna, "The Palo Verde Test Land Fallowing Program: A Model for Future California Water Transfers?." Pacific Institute, March 1996.

Loh, Penn and Steding, Anna, "Water Transfers in California: A Framework for Sustainability and Justice." Pacific Institute, March 1996.

Silva, Jesse P., "Written testimony in support of IID-SDCWA Joint Long-Term Transfer Petition, to the State Water Resources Control Board."

Smith, Rodney, "Written Testimony in Support of IID-SDCWA Joint Long-Term Transfer Petition, to the State Water Resources Control Board"

Summary of IID/SDCWA Transfer Agreement, Revised as of 12/18/01.

Sunding, David, Zilberman, David, Howitt, Richard, Dinar, Ariel and MacDougall, Neal. "Measuring the Costs of Reallocating Water from Agriculture: A Multi-Model Approach." *Natural Resources Modeling*, July 1999



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April 22, 2002

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Elston Grubaugh
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Imperial Irrigation District
P.O. Box 937
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Re: Draft Environmental Impact Report/Environmental Impact Statement for Imperial Irrigation District Water Conservation and Transfer Project and Draft Habitat Conservation Plan

Gentlemen:

The City of Westmorland wishes to make comments regarding the above-named DEIR/EIS as follows:

1. Environmental Justice

In light of the current requirement to address environmental justice issues, this impact needs to be fully addressed. The City of Westmorland is a community that will be affected in a substantial manner due to the impacts of any transfer or reduction of water to the agricultural industry as well as impacts due to fallowing. Our community's employee sector is occupied largely in agriculture, and the businesses in our city derive a large percentage of their income from these employees and farm-type activities. If fallowing occurs, farm employment will inevitably suffer. If water is sold through a transfer agreement, the cost for water to cities in our area will most surely increase. The citizens of our low-income community of a population of about 2000 recently had to shoulder the burden of improving our water treatment and wastewater treatment facilities to comply with state and federal regulatory requirements. The total cost of the improvements came to \$10 million in round figures with about \$1.7 million being the debt carried by our community. Additional costs to our community due to the impacts of this proposed Project could well become unbearable.

Environmental justice is violated when those who have more and are more powerful take water by force or craft from those who have less and are less powerful.

2. Economic Growth and Development of both Imperial County and San Diego County and others

The primary focus in the DEIR/EIS should be placed on Imperial County since we are the ones being put in the position of having to give up water. Reasonable growth in this county should not be affected by any water conservation/transfer plan. Mitigation measures need to be identified to accomplish that goal. It should be made abundantly clear that the need to develop conservation measures is incumbent on the counties and communities on the receiving end of water transfers to a much greater degree than it is on the Imperial County who is giving up the water.

It seems to be quite clear that San Diego and MWD are intent on securing adequate reliable sources of water that will ensure their ability to continue their current growth trends. It is also evident that their economic plans for their future include more water from the Colorado River via transfers from Imperial County. Therefore, strong emphasis should be placed on the need for those counties, areas, and communities to develop conservation methods and other new sources of water to meet their growth needs. **A mitigation measure should be set forth in the DEIR/EIS that requires those entities to develop new water sources to meet all new growth demands for water.** It appears that the most accessible and logical sources of new water are ocean water (desalination) and underground aquifers in their areas.

Imperial County does not have an alternative water source. The Colorado River water is the **only water source available in this area.** The Basin Plan for our region recognizes that **our groundwater is not usable for any purpose.** It is of the utmost importance that our water supply be protected from demands by other entities if we are to survive.

Letter - L3. Westmorland, City of. Signatory - Lawrence Ritchie.

Response to Comment L3-1

IID is not anticipated to increase its water rates under Proposed Project. Any borrowing related to the conservation and transfer of water would be funded by the contract payments made by SDCWA, CVWD, and/or MWD. In addition, IID would be reimbursed from the contract payments for any loss of revenues due to reduced water sales. Also note that the second implementation scenario for the Proposed Project (QSA Implementation) includes the more restrictive limit on IID's future diversions of Colorado River water on IID's Priority 3 diversions. Under the maximum transfers provided for under the QSA, IID would retain the ability to divert in excess of 2.6 MAFY of Colorado River water for agricultural, industrial, and domestic use within the IID water service area. This amount is anticipated to be sufficient for continued growth in these sectors at Baseline levels.

Response to Comment L3-2

In response to the comments, "Reasonable growth in this county should not be affected by any water conservation transfer plan. Mitigation measures need to be identified to accomplish this goal" and "Imperial County does not have an alternate water source": the Proposed Project involves implementation of agricultural water conservation measures only. Under the terms of the second implementation scenario for the Proposed Project (QSA Implementation), IID will retain the ability to divert in excess of 2.6 MAFY for agricultural, industrial, and domestic use within the current IID water service area. In addition, at the end of the initial 45-year term, the IID/SDCWA Transfer Agreement potentially allows IID to reclaim up to 34 KAFY of transfer water for M&I use within the Imperial Valley. This amount is twice the expected growth in M&I use within the IID water service area over the next 45 years. Therefore, the Proposed Project and alternatives as described in the Draft EIR/EIS can be implemented without compromising the Imperial Valley's urban water supply. IID will continue to make water deliveries reasonably required for municipal and industrial beneficial uses, including current use and expected growth in these sectors.

In response to the comment "It should be made abundantly clear that the need to develop conservation measures is incumbent on the counties and communities on the receiving end of water transfers": please refer to the Master Responses on *Other—Desalination on the SDWCA Service Area and Comments Calling for Increased Conservation and Other - Growth Inducement Analysis* in Section 3 of the Final EIR/EIS.

"Gateway City to Imperial Valley"

L3-1

L3-2

Response to Comment L3-2 (continued)

In response to the comment "It is also evident that their economic plans for their future includes more water from the Colorado River via transfers from Imperial County": IID is not contemplating additional transfers beyond those stated in the terms of the QSA and the IID/SDCWA Transfer Agreement. Any future transfers will be subject to the same public and environmental review as the current Proposed Project. Please refer to the Master Response on *Other—Desalination on the SDWCA Service Area and Comments Calling for Increased Conservation* in Section 3 of the Final EIR/EIS.

In response to the comment "The issue of Mexico's water use and demands as it affects this project should be addressed in the EIR/EIS": Mexico's use of Colorado River water is governed by "Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande" (the 1944 Mexican Treaty). The potential reduction in New River flows due to increased use of return flows in Mexico has been addressed in the Master Response on *Other—Cumulative Impacts (Mexicali Wastewater System Improvements)* in Section 3 of the of the Final EIR/EIS.

L 3-2

In addition to the Colorado River water allocations to the various states and entities, Mexico undoubtedly will bring their needs and growth expectations to the international table. This will further complicate water negotiations and deplete future reserves. The issue of Mexico's water use and demands as it affects this project should be addressed in the DEIR/EIS.

3. Socioeconomic Impacts

L 3-3

We disagree with the concept that Imperial Valley will benefit due to an economic stimulus as a result of the sale of water. On the contrary, the ultimate effect will create a negative net result since there is an interlinkage between the farming activity and businesses in our area. While secondary and indirect effects are nearly impossible to predict accurately, the impacts will most certainly be felt by all sectors of the community.

At present, the farm owners/operators are experiencing severe difficulties just keeping their businesses in operation. If more regulatory demands and costs are added to their burden, more farm businesses will be forced to cease operation. Much of the agricultural activity has already been relocated to Mexico and China. Additional regulatory demands will speed their exodus which will immediately be followed by the demise of our area.

L 3-4

We have been informed that the water itself does not cost anything, but the transport/delivery of the water is what provides the basis of the charges to farmers, cities, and other users. It should be self evident to all parties that, since water has become a marketable commodity, the market will dictate the cost for transport/ delivery of water. If water is transferred, an increase in the cost of the water delivered to our farmers and communities cannot be far behind. Because of this, the City is highly supportive of requiring the coastal communities to live within their specified allotment of Colorado River water (which we understand would amount to a reduction of 600,000 acre feet to their current usage).

Please furnish the City of Westmorland your response to our comments as well as the Final DEIR/EIS.

Yours truly,



Lawrence Ritchie
Mayor

- cc President George W. Bush
Vice President Richard Cheney
Secretary of the Interior Gail Norton
Senator Dianne Feinstein
Senator Barbara Boxer
Congressman Bob Filner
Governor Gray Davis
Lieutenant Governor Cruz Bustamante
Senator Jim Battin
Assemblyman Dave Kelly
County Supervisor Gary Wyatt
City Council
City Attorney

Response to Comment L3-3

The socioeconomics section of the Draft EIR/EIS (Section 3.14) address the beneficial and adverse affects of the Proposed Project and Alternatives. The comment regarding regulatory demands is noted.

Response to Comment L3-4

Comment noted.