LAND USE SERVICES DEPARTMENT

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ECONOMIC DEVELOPMENT
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MICHAEL E. HAYS
Director of Land Use Services

RECEIVED
APR 24 2002
RESOURCES PLANNING & MANAGEMENT DEPARTMENT

April 22, 2002

Mr. Bruce D. Ellis
Bureau of Reclamation
Phoenix Area Office
P. O. Box 81169
2222 West Dunlap Avenue, Suite 100
Phoenix, AZ 85021-2801

Mr. Elston Grubaugh, Manager
Imperial Irrigation District
Resource Planning & Management Dept.
P. O. Box 937
333 East Barioni Boulevard
Imperial, CA 92251

RE: IMPERIAL IRRIGATION DISTRICT WATER CONSEVATION AND TRANSFER PROJECT, DRAFT HABITAT CONSERVATION PLAN (HCP) – DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)/ENVIRONMENTAL IMPACT STATEMENT (EIS)

Dear Sirs:

L4-1 Thank you for providing our office a copy of the above-stated document for review and comment. Our office has no comment regarding this proposed project at this time. Please continue to forward any future applicable relevant environmental documents to our office at the address above.

Sincerely,

MATTHEW W. SLOWIK, MURP
Senior Associate Planner
Advance Planning Division

MWS:dja

Env Team\Comment Letters\ID Draft EIR_EIS Comment Ltr.doc

Letter - L4. County of San Bernardino Economic Development and Land Services Department. Signatory - Matthew W. Slowik.

Response to Comment L4-1

Comment noted.

CITY OF HOLTVILLE

121 WEST FIFTH STREET
CIVIC CENTER • HOLTVILLE, CALIFORNIA 92250-1298 • (760) 356-2912
"THE CARROT CAPITAL OF THE WORLD"

April 22, 2002

Attention: Elston Grubaugh
Manager of Res./Management/Planning
Imperial Irrigation District
P.O. Box 937
Imperial, CA 92251

RECEIVED
APR 25 2002
RESOURCE PLANNING
& MANAGEMENT DEPARTMENT

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

Regarding: Comments on the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed Quantification Settlement Agreement between the Imperial Irrigation District (IID) and the San Diego County Water Authority, the Coachella Valley Water District (CVWD) and the Metropolitan Water District (MWD).

BACKGROUND

L6-1

In 1998 the IID and the SDCWA entered into a transfer agreement for 300,000 acre feet (AF) of water. This agreement was replaced by the Quantification Settlement Agreement (QSA) that was expanded to address issues raised by four (4) agencies: the Imperial Irrigation District (IID), the San Diego County Water Authority (CWA), the Coachella Valley Water District (CVWD), and the Metropolitan Water District (MWD). The QSA transfers up to 300, 000 AF of water to each of the agencies in the following allotments; CWA (200,000 af), CVWD (100,000 af of which any portion not taken by CVWD can be taken by MWD). As a result of the proposed water transfer agreement CH2M Hill, Inc. was engaged to complete an environmental review on several alternatives. The alternatives are: 1) do not transfer the water, 2) transfer conserved water by making improvements to the IID system of canals and holding laterals (on-system improvements), 3) transfer water conserved from improvements made to farm infrastructure, or 4) fallow land and use that water to transfer.

The agreement seeks to settle a long-standing dispute among several Colorado River Basin states as well as water agencies in California. Currently, California is entitled to use 4.4 million-acre feet (MAF) of water. However, it is using around 5.2 MAF, which is an overdraft of 800,000 AF. The

Letter - L6. City of Holtville. Signatory - Allen Bailey.

Response to Comment L6-1

Comment noted.

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basin states are insisting the Department of the Interior enforce the law of the river and have California live within its allotment. If the agreement is signed California will have 15 years to reduce its consumption to within its allotment. If it does not it is said that the Department of the Interior, which has jurisdiction, will order an immediate cutback to the 4.4 MAF. This event, if it occurs, would be significant. The QSA is for an initial term of 45 years and may be extended for up to 30 years by mutual agreement of the parties.

ORGANIZATION

The comments in this report focus on the following areas:

L6-1

I. Environmental Justice

II. Economic Growth and Development.

III. Socio Economics and Third Party Impacts.

IV. The Salton Sea

V. Fallowing or Water Conservation

VI. Air Quality

VII. Archeological Resources

DISCUSSION

I. Environmental Justice

Environmental Justice plays a key role in any of the deliberations regarding the transfer between Imperial Irrigation District and the San Diego County Water Authority. Environmental Justice, which is enforced by the Environmental Protection Agency, became a factor in any federal project through Executive Order 12898 signed in 1994 by President Clinton.

L6-2

The goal of environmental justice is to ensure that all people, regardless of race, national origin or income, are protected from disproportionate impacts of environmental hazards. To be classified as an environmental justice community, residents must be a minority and/or low income group; excluded from the environmental policy setting and/or decision-making process; subject to a disproportionate impact from one or more environmental hazards, and experience a disparate implementation of environmental regulations, requirements, practices and activities in their communities.

L6-3

Comment 1

It is unreasonable for Imperial Valley residents and farmers to risk their businesses, livelihoods or

Response to Comment L6-2

Comment noted.

Response to Comment L6-3

Refer to response to Comment L9-3.

farms to transfer water to other users as a result of political pressure brought to bear by federal and state governments. In fact, this is the crux of the issue of environmental justice. The Imperial Valley meets the criteria for a stringent environmental justice review. The IID should deem it is essential that we have indemnity against surprises in the form of an order to mitigate or pay for impacts to the persons, property or the environment resulting from good-faith fulfillment of the water transfer. Also, the IID must be "held harmless" from any future costs of litigation or judgments stemming from environmental problems caused by the transfer which potentially would be passed along to ratepayers. L6-3

Comment 2

The thoroughness of the Environmental Justice review has been questioned by several agencies. Many have concluded that the water transfer EIR-EIS erroneously dismissed environmental justice as a factor in the transfer.

L6-4 The economist employed by the Community Advisory Commission, CIC Research, explained this error: "In general the Environmental Justice analysis performed by the consultant (the EIR/EIS) is superficial and inappropriately applied. Specifically, the community-level impact analysis was inappropriate for this project. The Consultant on the Draft EIR/EIS for the Proposed IID Water Conservation And Transfer Project should redo the environmental justice analysis based on the potential region-wide disproportional impacts to minority and low-income households resulting from the water transfer program. Furthermore, the Consultant should then provide recommendations for informational outreach to the impacted population and possible mitigation measures."

II. Economic Growth and Development

L6-5 The Land Use Element of Holtville's General Plan recites in its Key Principles and Programs "...Encourage the development of recreation and regional oriented commercial to expand the City's economy..." The General Plan continues "Developing a Local Tourism Plan/ Five Year Development Strategy with the assistance of the Regional Economic Development, Inc. taking into account the regions' unique natural and cultural resources." It then seems very likely that the transfer of water will eliminate future opportunities to implement the General Plan of the City.

Comment 3

L6-6 No matter how water is ultimately transferred, the decision boils down to an evaluation of the impacts and mitigation factors if there is on-farm and system conservation or fallowing—or a combination of those alternatives An independent study by CIC Research has found flaws in the assumptions used in the EIR/EIS. As a result, the costs of the selected alternative and the impacts to the valley may not be reliable. The studies for example, have used data on the economy of the Salton Sea community that is 15 years old. In fact, the Sea has been projected to "die" several times in the past 40 years and therefore to predict a time and date of demise is, at best, premature.

Comment 4

L6-7 The Imperial Valley agricultural community currently rotates its crops and land depending upon market conditions. All of the alternatives contain fallowing, however, some are temporary until

Response to Comment L6-4

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.

Response to Comment L6-5

Refer to response for Comment L9-5.

Response to Comment L6-6

Refer to response to Comment L9-6.

Response to Comment L6-7

Refer to response to Comment L9-7.

L6-7 conservation measures are implemented or conservation inducing infrastructure is built. However, if fallowing becomes the recommended program because it has the least job losses of 500 versus up to 1400, what is the ability of the Imperial Valley to sustain its economic growth in light of losses of 15 to 20% of farmland under a fallowing alternative?

L6-8 **Comment 5**
The EIR/EIS does not account for the possibility that the Sea will survive (such as a tropical rainstorm which provided needed fresh water in the recent past) and the economic opportunities to the Valley that would be available if it does survive.

L6-9 **Comment 6**
The EIR/EIS does not address the impacts to the rest of the Imperial Valley if the Sea should be allowed to die prematurely, as is projected under some of the conservation alternatives. What is the loss of economic opportunity to the rest of the Imperial Valley as a result of a smaller Sea, particularly if the exposed lakebed causes air quality issues or exacerbates dust storms?

L6-10 **Comment 7**
The EIR/EIS does not address the growth inducement of available water to the San Diego region. According to San Diego Dialogue, the San Diego/Baja region will increase its population by 2.2 million in 20 years, increasing its water consumption from 780,000 AF to 980,000 AF. What would be the impacts to the Imperial Valley if the water transfer did not occur and the San Diego region acquired its water reliability objectives via desalinization, re-use of wastewater, and/or declaring a moratorium on building of new homes?

L6-11 **Comment 8**
The EIR/EIS does not address the potentially positive impacts to the Imperial Valley of limiting growth in the San Diego region and redirecting the growth to the Imperial Valley. What would be the impacts of declaring a moratorium in the San Diego Region?

L6-12 **Comment 9**
The EIR/EIS does not take into account collateral damage as a result of any transfer of water for the future growth and development of the Imperial Valley. It also does not address how the San Diego Region will provide for the next 20 years of need from 2020 to 2040.

L6-13 **Comment 10**
The EIR/EIS does not examine the current efforts of northern California cities to reclaim water rights transferred to MWD, nor does it address the cost to MWD of putting 25,000 AF of water on Owens Lake to mitigate air quality violations resulting from dust migration. Several cities have already claimed some 31,000 AF to revert back to the original stakeholders. The EIR/EIS does not address the fact that water is beneficially reused to mitigate air quality emissions at Owens Lake but dismisses air quality concerns at the Salton Sea without any reliable scientific evidence.

L6-14 **Comment 11**
While non-fallowing may produce potentially positive impacts and certainly avoid the negative economic fallout from pure fallowing for the core area of Imperial Valley, it carries the potential for

Response to Comment L6-8
Refer to response to Comment L9-8.

Response to Comment L6-9
Refer to response to Comment L9-9.

Response to Comment L6-10
Refer to response to Comment L9-10.

Response to Comment L6-11
Please refer to the response given for Comment L9-11.

Response to Comment L6-12
Please refer to the response given for Comment L9-12.

Response to Comment L6-13
Please refer to the response given for Comment L9-13.

Response to Comment L6-14
Comment noted.

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L6-14 serious environmental and socio economic consequences to the Salton Sea and the surrounding communities. The non-fallowing alternatives also raise significant questions regarding air quality and health that have yet to be resolved and the aesthetic aspects of a much-reduced Sea could create disincentives for regional economic development.

L6-15

Comment 12

L6-16 The economic incentives appear to be far less than they are portrayed in the EIR/EIS. According to CIC Research, lower prices paid by Coachella and the Metropolitan Water District under the Quantification Agreement, coupled with state and federal taxes, would substantially reduce net revenue from the transfer. CIC calculated that an average $87.2 million in annual revenue would dwindle to $1.5 million to cover IID Program costs with 300,000 acre feet conserved from generic non-fallowing plans. As for conservation of the minimum to meet the QSA--230, 000 acre feet (100,000 acre feet to CVWD and MWD and 130,000 acre feet to San Diego) "(With) $50.5 million in average annual revenue and the CH2M Hill analysis of $35.8 million in annual conservation costs plus $18.4 million in annual farmer payments, the program ends up $3.7 million short of paying for itself." (CIC page 5)

Comment 13

L6-17 The CH2M Hill Study does not adequately analyze the benefits, if any, to the economy from Salton Sea Recreation. A study by the CIC, commissioned in the late 1980s by the State Fish and Game, found that there was an $80 million annual contribution from recreation on the lake. According to Norm Niver, of the West Shores Chamber of Commerce, the revenue from the transfer should be compared to that study.

"That's (when the study was completed) when State Park Headquarters had only 80,000 visitors. We are and have been growing in visitor days at the State Park," Niver said. He said there are nearly 1 million visitor days there currently. The study, which was based upon 1987 data, should be updated. If relevant, the updated data should be factored in to the impacts if the transfer results in killing the Sea.

Comment 14

L6-18 Other parties (i.e. San Diego County Water Authority, federal and/or state government) should bear any costs to mitigate any impacts due to the transfer, including property in communities along the Salton Sea that are impacted due to the transfer.

Specifically, Imperial County residents, including public agencies such as cities, the county and the IID, should not be financially responsible for any air quality, biological, or economic impacts due to physical changes in the Salton Sea. The major negative socio-economic impact would be to Salton Sea-area residents and to the recreation industry in that region.

Comment 15

L6-19 Revenues from the water transfer would presumably go to the landowners, many of whom live out of Imperial Valley, thereby reducing the total amount of transfer revenue to the Imperial Valley economy.

Response to Comment L6-15

Refer to responses to Comment L9-15 and Comment L9-16.

Response to Comment L6-16

Refer to response to Comment L9-17.

Response to Comment L6-17

Refer to response to Comment L9-18.

Response to Comment L6-18

Comment noted.

Response to Comment L6-19

Refer to response to Comment L9-20.

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Pure fallowing, especially permanent fallowing, has the potential for producing the most negative direct socio-economic impacts of any alternative with very few corresponding direct positive impacts in the Imperial County. The only exception is the Salton Sea, and communities around the Sea, which would not be significantly impacted.

Pure fallowing does not discriminate between marginal or highly productive land, does not ensure that the revenues would be used in capital investment in Imperial Valley and could create adverse impacts on land values, and because land is fallowed for up to 75 years could create air quality and health issues. Additionally, economic forces and the participants would dictate what land is fallowed. There is no assurance that the land taken out of production would be marginal, low crop value ground.

L6-19 With the exception of the Farm Bureau Plan (discussed above) that temporarily takes land out of production to build capital for long-range on farm conservation measures, the only realistic reason to fallow ground would be to prevent environmental impacts to the Salton Sea. The cost in jobs in the central portion of the Valley has been estimated to range from 500 to 1,400 jobs.

Comment 16

L6-20 The Draft EIR/EIS concludes that the water transfer will simply change the distribution of existing California water supplies from the Colorado River and will not be changing the existing land use or water supply in San Diego County. The Draft EIR/EIS should especially make note of this important issue in light of the new legislative bills being passed, S.B. 221 and S.B. 601 imposing stricter requirements for new development to be founded on assured drought-year supplies. The San Diego County Water Management Plan also shows that this water transfer is vital in order to maintain San Diego's current "expectation" of serving a population that is continuing to grow and will rise to over 3.8 million by the year 2020.

Comment 17

L6-21 The San Diego Region is expected to add more than 500,000 new jobs and the population is expected to increase by more than a million people by 2020 (SANDAG, "Measuring the San Diego Region's Livability"). San Diego will also have to provide more than 400,000 new houses and expand its infrastructure to accommodate the new jobs and people. An important aspect of this "infrastructure" is making enough water available to San Diego to provide this type of "build out" for San Diego to accommodate the addition of over one million people over the next 20 years. The most important infrastructure items (as noted by SANDAG) include a more secure water supply. The final EIR/EIS should address this growth and the need for water resources beyond the 20-year horizon

Comment 18

L6-22 More than 90% of the San Diego region's water is imported from the Colorado River and northern California in any given year. And, last year the San Diego region used approximately 620,000 acre-feet of water. Increasing population and jobs within the San Diego region will require the development of additional water supplies and should include water conservation, water recycling and brackish groundwater recovery. The viability of each of the options should be addressed as alternatives to transferring Imperial Valley water.

Response to Comment L6-20

Please refer to the Master Response on *Other—Growth Inducement Analysis* in Section 3 of this Final EIR/EIS.

Response to Comment L6-21

Please refer to the Master Response on *Other—Growth Inducement Analysis* in Section 3 of this Final EIR/EIS.

Response to Comment L6-22

Please refer to the Master Response on *Other—Desalination in SDWCA Service Area and Comments Calling for Increased Conservation* in Section 3 of this Final EIR/EIS.

III. Socio Economics

L6-23

Comment 19
In a 1999 Board Resolution, the Imperial Irrigation District Board stated, "...The terms of any final comprehensive settlement agreement must not unfairly impose burdens on the agricultural economy of the Imperial Valley in order to benefit the nonagricultural economy of the Coachella or MWD's service area". We concur with this IID statement of policy for protecting the agricultural economy of Imperial County.

L6-24

Comment 20
The EIR/EIS states that the water transfer is an "economic stimulus to the Imperial Valley." The concept of removing a portion of the limited water supply to another community is counter-productive to future growth and development in the community, and it is arguable whether the revenue received will actually stimulate the economy of the Imperial Valley because virtually half of all payments will be taken by landowners who reside outside of the Valley. An analysis with up to date data should be performed on the project to provide comparable information.

L6-25

Comment 21
The transfer of water will result in a reduction of available water, which will either result in removing farmland from production or the installation of expensive conservation methods. In the first case, fallowing takes farmland out of production and makes it idle causing the loss of jobs, aggravates air quality from increased dust emissions, and dismisses the federal environmental justice standards. In the second case of on farm conservation proposal, the use of tailwater is not recognized as a beneficial use for maintenance of the Salton Sea, the financial investment is lopsided for the return on investment, and the financial risk of the plan is placed on the farmers for the first few years. These impacts must be seriously studied and mitigated since it is very likely either of the proposed projects will have serious consequences for the Imperial Valley.

L6-26

Comment 22
The proposed projects and alternatives all use fallowing to some degree. However, there are about 500,000 acres currently under agricultural production. Of these, some 5% is always being fallowed for business purposes. Additional land has been taken out of the land bank as a result of the Williamson Act of about 100,000 acres. Some of the proposals, which consider up to 100,000 acres being fallowed meeting the transfer requirements and the maintenance of the Salton Sea, would have dire economic impacts on agricultural production and indirectly on farm-related support businesses, as well as the housing and commercial sectors. The result will have serious impacts on the Imperial Valley's economy. Farming communities tend to be interdependent, so impacts on one community could be felt by a number of surrounding communities. Taking 20 – 25% of the farmable land out of production, while not providing any quantified benefit would surely damage and may even destroy the economy and have a "ripple effect" on the surrounding communities.

L6-27

Comment 23
Section 5.1.2.7 ("Socioeconomic"), under ("Cumulative Impacts, under Section 5 "Other CEQA/NEPA Considerations), of the Draft EIR/EIS states that there are expected potential impacts

Response to Comment L6-23
Comment noted.

Response to Comment L6-24
Refer to response to Comment L9-25.

Response to Comment L6-25
Refer to response to Comment L9-26.

Response to Comment L6-26
Refer to response to Comment L9-27.

Response to Comment L6-27
Refer to response to Comment L9-28.

from implementation of the Proposed Project as follows:

> "A reduction in employment opportunities may result depending on the specific type and amounts of water conservation methods that are selected. Employment opportunities may decline if the amount of land that is fallowed increases, while jobs would be created by the construction and operation of either on-farm irrigation system water conservation measures. Depending on the relative proportion of the conservation measures, an impact or benefit may accrue through implementation of the Proposed Project. The other projects identified above could also result in construction and operational demands that increase employment opportunities in Imperial County".

L6-27 In essence, no one really knows whether this will result in a benefit because the implementation of the selected alternative may have severe consequences to the current and future economic health of the Imperial Valley. It is clear from the Draft EIR/EIS, within its "Alternatives" that a water transfer would limit future agricultural growth in Imperial County due to less acres being farmed and therefore fewer agricultural-related jobs would be created and therefore less demand for secondary agriculture-related purchases/services. What mitigation measures are planned to offset this event?

L6-28 **Comment 24**
The proposed project must take into account the unique aspects of the agricultural community and recognize its fragile nature. Third party impacts, as a result of loss of jobs, impacts to the Salton Sea, fallowing (temporary and permanent) have not been sufficiently detailed to determine with reasonable certainty that the economy will be sustained. Analysis by independent experts to construct such information should be included as part of the implementation plan.

L6-29 **Comment 25**
If the conservation method of "fallowing" is used to facilitate the water transfer, not only will farm laborers lose employment, but also secondary employment in the farm service industry.

IV. The Salton Sea

L6-30 **Comment 26**
The death of the Salton Sea will also have a significant impact on the economy of Imperial County. These impacts include transient recreational use dollars attributed to the Sea, permanent reduction in residential property values of communities closet to the Seas such as Salton City, Bombay Beach, Desert Shores and Salton Sea Beach. A complete scientific assessment must be conducted into the
L6-31 health and air quality issues that have been raised due to potential exposure of the Salton Sea lakebed.

L6-32 **Comment 27**
The socioeconomic impacts to low income populations as a result of the reduction in water flow to the Sea will affect the communities living around the Salton Sea. What mitigation measures are proposed to offset the loss of employment, decline in sales tax revenues, and population?

Response to Comment L6-28
Refer to response to Comment L9-29.

Response to Comment L6-29
Refer to response to Comment L9-30.

Response to Comment L6-30
Refer to the Master Response on *Socioeconomics—Property Values and Fiscal Impact Estimates* in Section 3 of this Final EIR/EIS.

Response to Comment L6-31
Refer to response to Comment L9-32.

Response to Comment L6-32
Refer to response to Comment L9-33.

Comment 28

L6-33 The EIS/EIR "No Project Alternative" notes that the Salton Sea will decrease in size and eventually fail to support the many activities that are currently in place including, fishing, birding, recreational water sports and camping. The last two years have seen resurgence in the visitors to the Sea and a consequent increase in residential, retail and commercial development. Further, several studies have provided insight into how to save the Sea and the Salton Sea Authority has established clear goals on maintaining or improving the Sea for a variety of purposes.

Comment 29

L6-34 Other parties (i.e. San Diego County Water Authority, federal and/or state government) should bear any costs to mitigate any impacts due to the transfer, including property in communities along the Salton Sea that are impacted due to the transfer.

Comment 30

L6-35 Desalination plants are a very important viable option that is never mentioned in the Draft EIR/EIS as a possible future source of water for San Diego region. Projects currently being developed in Florida indicate that the cost of these plants may have decreased to such a point where it now can be considered a potential option for coastal areas including San Diego.

Comment 31

L6-36 Instead of solely relying on water transfers to meet infrastructure needs resulting from future growth demands in San Diego region, San Diego should be working to implement water conservation, recycling and groundwater recovery programs, desalinated seawater, local groundwater source known as the "San Diego Formation" and also, to encourage citizens to proactively conserve water.

V. Fallowing or Water Conservation

Comment 32

L6-37 The Agriculture and Soils Conservation Element of the City's General Plan recites in its Key Principles and Programs "To coordinate programs of action between the City, County, and State, to insure the effective conservation of agricultural land uses within the region."

In a climate where crop rotation and fallowing is the exception to the rule having farmland fallowed will result in an alteration of the existing aesthetic green vistas. The Draft EIR/EIS states, page 3.11-20 (Section 3.11.4.3 "Aesthetics"), "Although the additional fallowed acreage could be three times the current amount, it would be distributed through the sub region and would not become an obvious physical feature on the landscape." In this desert environment any fallowing of the land will cause visual impacts to the aesthetic character of Imperial Valley. Currently, many farms idle the field for part of the year, so the landscape is constantly changing from cropped to fallow acreage. However, fallowing of the land will in fact cause visual impacts to the aesthetic character of Imperial Valley. Large patches of bare land for extended periods of time created due to fallowing will certainly create an impact in otherwise agricultural areas and degrade the visual character of the area. Therefore, there are indeed some measurable impacts on the aesthetic character of the Valley.

Response to Comment L6-33

See Master Responses on *Hydrology—Development of the Baseline* and *Other—Relationship Between the Proposed Project and the Salton Sea Restoration Project* in Section 3 of this Final EIR/EIS.

Response to Comment L6-34

Comment noted.

Response to Comment L6-35

Refer to response to Comment L9-36.

Response to Comment L6-36

Please refer to the Master Response on *Other—Desalination in SDWCA Service Area and Comments Calling for Increased Conservation* in Section 3 of this Final EIR/EIS.

Response to Comment L6-37

Refer to response to Comment L9-38.