

Response to Comment L9-34

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 L9-35

Comment noted.

Response to Comment L9-36

Desalination is discussed in Appendix D of the Draft EIR/EIS, Alternative 8, Maximize Local Supplies in SDCWA and Develop 200 KAFY Desalination Facility. This Alternative is also summarized in Section 4, Alternatives of the Draft EIR/EIS, Table 4-4. For additional information, refer to the Master Responses on *Other—Desalination in SDCWA Service Area* and *Other—Comments Calling for Increased Conservation* in this Final EIR/EIS.

Comment 31

L9-37

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

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.”

L9-38

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.

Comment 33

L9-39

On page 3.4-12, it states, “...Under the proposed project, fallowing could be implemented as a conservation measure. If fallowing were the sole conservation measure implemented, up to 50,000 acres could be fallowed to conserve water for transfer...Fallowed acreage is not expected to be permanently taken out of production; however, permanent fallowing of agricultural land could be used to conserve water for transfer.”

Therefore, it is conceivable that those willing farmers who are currently cultivating their lands could utilize this environmental document for its stated purpose, i.e., “...permanent fallowing of agricultural land could be used to conserve water for transfer...” If this is the case, then the decision-makers and the public have been forewarned by this document of future water transfers using “permanent fallowing”.

Comment 34

L9-40

Opposition to fallowing as a method of implementing the water transfer has been stated numerous times in several documents; however, the Draft EIR/EIS also states that fallowing may be a desirable component of the IID water conservation program for a number of reasons. Some of these include: used as a way to reduce farmers’ financial risk of participation in conservation programs; easier to

Response to Comment L9-37

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 L9-38

The fallowing of additional acreage within the IID water service area is not considered to be a significant visual impact. The fallowed acreage will likely be similar in color to the surrounding desert habitat as well as lands that are currently fallowed and farms that are between cropping periods. As such, the fallowed lands will not introduce a new visual element that would be disruptive to the existing landscape and will not constitute a substantial degradation of the visual quality of the area. No mitigation is necessary.

Response to Comment L9-39

The Draft EIR/EIS is limited to an analysis of the Proposed Project and Alternatives, not speculative future water transfers. The document identifies that the IID/SDCWA Transfer Agreement could be modified to allow fallowing, rotational or non-rotational, as a conservation measure. (In the context of this analysis, rotational fallowing is defined as fallowing for less than 4 years, and non-rotational fallowing is defined as fallowing for greater than 4 years). The adverse effects of the use of fallowing as the exclusive conservation measure are described in Section 3.5 of the Draft EIR/EIS. Section 3.5 also identifies the effects of non-rotational fallowing as a potentially significant impact to agricultural resources. Modifications to this text are indicated in subsection 3.5 under Section 4.2, Text Revisions of this Final EIR/EIS.

Response to Comment L9-40

We agree with the comment that the pros and cons of fallowing must be evaluated. The purpose of the EIR/EIS is to evaluate the impacts of different conservation methods so that the Lead Agencies can compare the relative impacts and make an informed decision on whether and how to proceed with the Project. The Lead Agencies must evaluate the information contained in the Final EIR/EIS before making any decision, including information provided through the public comment process, and must support its decision by written findings.

implement and manage than other conservation measures; and, that it would preserve the soil. It appears that the IID Board will also have to change its policies.

Note that on page 2-31 of the Draft EIR/EIS in relation to IID board adopting policies regarding fallowing as part of guidelines intended to govern IID's water transfer policy and negotiation of the IID/SDWCA Transfer Agreement, it states "any no fallowing rule should preclude a participating landowner from receiving compensation if he/she fallows land for the purpose of transferring water". The Draft EIR/EIS also states that, fallowing is not in keeping with IID Board policies to utilize the water transfer program, "to encourage investment in on-farm irrigation system improvements that increase irrigation efficiency" regarding fallowing and the various conservation methods.

L9-40

In consideration of the stated impacts of fallowing and the lack of scientific and supportable data that provides verifiable and quantifiable impacts to the Imperial Valley, any conclusion that fallowing is a preferred means of implementing the water transfer must be addressed.

VI. Air Quality

Comment 35

L9-41

The Water Conservation and Air Quality Element of the City's General Plan recites in its objectives "protect and maintain the good air quality of the Imperial Valley region." The Imperial County has been declared a moderate PM-10 non-attainment area under the 1990 Clean Air Act. Currently, children in the Imperial Valley experience significantly higher instances of bronchial maladies. There are two effects of water activities that lead to the increases in PM-10 emissions that should be mitigated. These include emissions from fallowed land and emissions from exposed portions of the Salton Sea.

Comment 36

L9-42

The proposed project by IID appears to create the strong possibility of environmental damage to local air quality and therefore the cumulative impacts must be mitigated and conform to federal, state and local laws and regulations.

Comment 37

L9-43

What are the potential health issues due to air quality deterioration from a reduced lakebed at the Salton Sea?

Comment 38

L9-44

What is the potential for air quality deterioration from fallowing up to 60,000 acres of farmland in the agricultural areas of the Valley? Also, what are the projected impacts on health care of children and senior citizens, in particular?

VII. Archeological Resources

Comment 39

L9-45

The Draft EIR/EIS fails to adequately address the archeological and cultural resources impacts of the water transfer. In the Imperial Valley there are approximately 7,000 prehistoric archaeological and recorded sites as well as approximately 200 historic sites dating back to 1540.

Response to Comment L9-41

Refer to the following Master Responses in Section 3 of the Final EIR/EIS: *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan*; *Air Quality—Air Quality Issues Associated with Fallowing*; and *Air Quality—Health Effects Associated with Dust Emissions*.

Response to Comment L9-42

Refer to the Master Response on *Air Quality—Consistency with the State Implementation Plan for PM10* in Section 3 of this Final EIR/EIS.

Response to Comment L9-43

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

Response to Comment L9-44

Refer to the Master Responses on *Air Quality—Air Quality Issues Associated with Fallowing* and *Air Quality—Health Effects Associated with Dust Emissions* in Section 3 of this Final EIR/IS.

Response to Comment L9-45

The commenter does not specify how the Draft EIR/EIS fails to adequately address the archaeological and cultural resources impacts of the Proposed Project. We believe the EIR/EIS is a good faith and reasonable effort to identify and assess the impacts to archaeological and cultural resources from implementation of the Project based upon available information and assessment methods. Such impacts are included in the Draft EIR/EIS in Section 3.8, Cultural Resources.



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Subject: 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).

Dear Sirs:

L13-1

The City of Brawley is providing these comments on the proposed IID/SDCWA (San Diego County Water Authority) water transfer and the Draft EIR/EIS to support both IID and BOR in meeting their obligation to protect the economy and the environment of Imperial County. The City of Brawley understands that there is enormous pressure that is being applied toward the IID, BOR and the Imperial County residents to transfer water from Imperial Valley to other users in the Colorado River Basin. However, IID and Bureau of Reclamation must improve their assessment of the following issues regarding the water transfer. These issues include but are not limited to, the decrease of water supply that will be available for the Imperial Valley, the bearing to our air quality, and the economic impacts with regards to growth and socio economics.

L13-2

With the origination of the water transfer in Imperial County, it will create environmental and economical impacts on the community. The final DEIR/EIS needs to focus and address sufficient and more detailed information to provide the political consensus to support the water transfer.

L13-3

The DEIR/EIS document does not address the effects that this water transfer will have to the County's future needs with regards to economic development. With the anticipation of the Imperial County doubling its population within the next twenty (20) years, the Draft EIR/EIS needs to identify how this transfer and future projects will ensure enough water to remain in Imperial County to meet future needs of both domestic and urban water users or, in the alternative, at least propose adequate mitigation measures in order to achieve these objectives.

Letter - L13. City of Brawley Economic & Community Development. Signatory - Jerry Santillan.

Response to Comment L13-1

Comment noted. Responses to the individual concerns enumerated in the comment letter are provided.

Response to Comment L13-2

The EIR/EIS addresses the environmental and socioeconomic impacts of the Project, to provide information to the public and to decisionmakers, such as the IID Board. The EIR/EIS is not designed to "provide the political consensus to support the water transfer." The IID Board must decide whether to approve the Project, after considering the Final EIR/EIS and the other information in the record.

Response to Comment L13-3

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. 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 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.

Economic Development Growth/Impacts & Socio Economics

L13-4

(1) The impacts and mitigation factors if there is on-farm and system conservation or fallowing need to be evaluated. The study done by CIC Research has found errors on the assumptions that were used in the EIR/EIS. The flaws in the data that was used make the report unreliable. The data was collected 15 years ago, which makes it outdated.

L13-5

(2) The transfer of water will result in a reduction of available water. This transfer will either result in removing farmland from production or require the installation of expensive conservation methods on fields, both could have a negative economic impact on Imperial County and its residents.

L13-6

(3) On Page 1-29 of the DEIR/EIS, it states that the water transfer is an "economic stimulus to the Imperial Valley". This concept of transferring a portion of our limited water supply to another community seems to be an imposition and burden on the agricultural economy of Imperial County. In a 1999 IID Board resolution, it was stated that "... 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". The City concurs with this IID statement of policy for protecting Imperial County.

L13-7

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

L13-8

Further, the statement is made that "The Proposed Project would therefore, have no or a minor impact to the socioeconomic resources and would not contribute to a cumulative impact". As discussed previously, the "permanent fallowing" of agricultural lands in Imperial County, no matter what "water conservation methods that are selected" could be a very significant cumulative socioeconomic impact and is not a "...minor impact..." on farmers and farm workers in the County's agricultural community.

Response to Comment L13-4

The Executive Summary of the report prepared by CIC Research, dated March 15, 2002 (revised April 9,2002) states: " CIC could find no substantive disagreement with the results as presented in the IID Water Conservation and Transfer Project Draft EIR/EIS."

See the Master Response on *Socioeconomics—Crop Type Assumptions for Socioeconomic Analysis of Fallowing* in Section 3 of this Final EIR/EIS for additional details regarding the assumptions used in the following impact analysis.

Response to Comment L13-5

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. 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 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. The socioeconomic impacts of the Proposed Project and alternatives are described in Section 3.14 of the Draft EIR/EIS.

Response to Comment L13-6

Page 1-29 of the Draft EIR/EIS states, "IID anticipated that the proceeds from the sale of conserved water would provide economic benefits to cooperating landowners, tenants, and IID, and an economic stimulus to the Imperial Valley." This statement is true with regard to the anticipated socioeconomic effects of the Proposed Project, unless a substantial portion of the conserved water is generated by fallowing. The adverse effects of fallowing are described in Section 3.14 of the Draft EIR/EIS. Regarding the availability of water for agricultural production, the Proposed Project involves implementation of agricultural

Response to Comment L13-6 (continued)

water conservation measures only. Under the terms of the Quantification Settlement Agreement, 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 municipal and industrial use within the Imperial Valley. This amount is twice the expected growth in municipal and industrial 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.

Response to Comment L13-7

Comment noted.

Response to Comment L13-8

No cumulative socioeconomic effects would result from implementation of the Proposed Project and/or Alternatives in conjunction with the other projects included in the cumulative impact analysis because all of the other projects in the analysis would add jobs, in connection with construction and operation of project facilities, in Imperial County. There is no cumulative impact unless the adverse impacts of the Proposed Project and/or Alternatives are exacerbated by implementation of one or more of the projects included in the cumulative impact analysis.

L13-9 5) As a farming community, Imperial County has a fragile economy, typically overly dependent on the changing markets. Our unemployment rate is typically higher than in urban areas. If the conservation method of "fallowing" is used to facilitate the water transfer, implications will arise, such as, not only will farm laborers lose employment, but also secondary employment in the farm service industry. The Draft EIR/EIS identifies a potential job loss of 1,400 due to transfer and conservation by fallowing alone. What are the fiscal costs of increased unemployment (e.g. job training, crime, assistance payments)? This reduction in employment will have a devastating "domino effect" on Imperial County's economy. Any reduction in agricultural production could have a serious negative effect on a farming community with direct impacts on laid-off farm laborers, seed, pesticide, and farm implement sellers, and indirect impacts on commercial, housing and educational institutions.

L13-10 (6) 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 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.

L13-11 (7) Our incentives, economically, appear to be far less than they are portrayed in the EIR/EIS. Our net revenue under the Quantification Agreement, coupled with state and federal taxes, would considerably be reduced from this water 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)

L13-12 (8) 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 water supply in Southern California. According to Maureen Stapleton (SDCWA General Manager) this transfer is not a redistribution of existing water supplies, but in actuality, is considered to be a "new water" source. Not surprisingly, the San Diego County 2000 Urban Water Management Plan also shows that this water transfer is vital in order to maintain San Diego's current expectation of a population growth.

L13-13 (9) The DEIR/EIS document concludes that the water transfer is solely a "replacement" of water that could be lost due to the federal enforcement of California's 4.4 portion. The UWMP has also significantly left the door open for San Diego region to request further water transfers from Imperial Valley to meet their anticipated increase needs.

Response to Comment L13-9

The Draft EIR/EIS presents the total jobs that are anticipated to be lost within the Imperial County economy as a result of fallowing. The job loss estimates include job losses in farm support industries.

For additional information on the potential fiscal impacts of the Proposed Project and alternatives, please refer to the Master Response on *Socioeconomics—Property Values and Fiscal Impact Estimates* in Section 3 in this Final EIR/EIS.

Response to Comment L13-10

The Draft EIR/EIS has been revised to better identify the potential socioeconomic impacts to the Salton Sea subregion. This change is indicated in this Final EIR/EIS in subsection 3.14 under Section 4.2, Text Revisions. Also, refer to the Master Responses on *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.

Response to Comment L13-11

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.

Response to Comment L13-12

While the source of the statement attributed to the SDCWA General Manager by the commenter is unknown, it is acknowledged that the IID/SDCWA water transfer has been characterized in different ways by a number of people. As the SDCWA 2000 Urban Water Management Plan indicates, the IID transfer water will replace a portion of the imported water supplies that SDCWA has until now procured solely from MWD. The water transfer will only help ensure that the amount of imported water supplies that have been available to SDCWA in the past will continue to be available. Whether this is considered "new" water or "replacement" water or is given some other name, the effect is the same.

Response to Comment L13-13

The Water Conservation and Transfer Agreement between IID and SDCWA stipulates a transfer amount of up to 300 KAFY over a period of up to 75 years. Any additional water agreements between SDCWA and IID or any other water purveyor would require a separate agreement and corresponding environmental documentation.

L13-14 (10) Just last year, San Diego region used approximately 620,000 acre-feet of water. 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, recycling and groundwater recovery programs, desalinated seawater, local groundwater source known as the "San Diego Formation" and also, to encourage citizens to pro-actively conserve water.

L13-15 (11) Desalination offers a viable alternative to the water transfer, yet it is never mentioned in the Draft EIR/EIS as a possible alternative source of water for San Diego region. This is a possible feasible alternative, which may lessen the need for large amounts of water transfer from outside San Diego.

L13-16 (12) San Diego County's population is expected to increase significantly by 2010 and more than 500,000 new jobs will be developed. San Diego will also have to provide more than 400,000 new houses and expand their infrastructure to accommodate the new jobs and people. The water transfer is an important aspect of this "infrastructure" to make enough water available to San Diego to provide for this type of expansion.

Fallowing

L13-17 (13) According to Page 2-30 under the IID/SDCWA Transfer Agreement, fallowing is not a permitted conservation method, and prohibits farmers from "on-farm" fallowing. Under the Quantification Settlement Agreement (QSA), fallowing is deemed not be a permitted conservation measure by IID and prohibits individual farmers from fallowing. There seems to be some inconsistencies between the QSA and EIR/EIS on this issue and the Final EIR/EIS should clarify these inconsistencies.

L13-18 (14) The Imperial Valley agriculture community currently rotates its crops and land depending on the market conditions. Fallowing, will only increase unemployment in an area that is already a leader in unemployment statistics. People in support industries would be hurt by creating further unemployment because of scale backs. Sales tax and property tax revenues will be affected by taking land out of production.

L13-19 (15) The economic impact of removing farmland from production could have a significant direct impact on agricultural production and an indirect affect on farm-related support businesses; the housing and commercial sectors. The result will be that Imperial Valley's economy could be devastated. Farming communities tend to be interdependent, so impacts on one community could be felt by a number of surrounding communities. Taking nearly a fifth (20%) of the farmable land out of production, while not providing any quantifiable benefit would surely damage and may even destroy the economy and have a "ripple effect" on the surrounding communities. The Draft EIR/EIS does not quantify how these impacts would be mitigated. Any mitigation needs to analyze the impacts of land fallowing with regard profit per acre or profit per acre foot of water, when assessing value per acre and labor (jobs) per acre.

Response to Comment L13-14

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 L13-15

Desalination is discussed in Appendix D of the Draft EIR/EIS, Alternative 8, Maximize Local Supplies in SDCWA and Develop 200 KAFY Desalination Facility. This Alternative is also summarized in Section 4, Alternatives of the Draft EIR/EIS, Table 4-4. For additional information, refer to the Master Responses on *Other—Desalination in SDCWA Service Area and Other—Comments Calling for Increased Conservation* in this Final EIR/EIS.

Response to Comment L13-16

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

Response to Comment L13-17

The QSA does not contain any language prohibiting fallowing as a means to conserve water for transfer. Under the IID/SDCWA Transfer Agreement, fallowing is not permitted as an on-farm conservation measure to generate water for transfer. As indicated in the Draft EIR/EIS, this restriction could be waived by SDCWA prior to Project implementation. For a detailed discussion of implementation of fallowing as a conservation measure, refer to Section 2.2.3.4 in the Draft EIR/EIS.

Response to Comment L13-18

See response to Comment L13-9.

Response to Comment L13-19

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

Response to Comment L13-19 (continued)

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. 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 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.

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.