

fish farms in the area. Efforts to extend the tilapia fishery in the Salton Sea will also have a negative impact on fish farms in the area. **Why doesn't the EIR/EIS and HCP address this potential impact on area fish farms?**

#### PUPFISH

Another issue with the proposed tilapia hatchery deals with desert pupfish. An elaborate species-specific conservation plan is found in Section 3.7.2 of the HCP. This plan proposes to maintain ready access for movement of desert pupfish between the Salton Sea and certain IID drains and between various IID drains. Page 3-121 of the HCP contains the following sentence: **"Pupfish populations also influenced by interactions with exotic species."**

**These exotic species are not identified nor are these interactions properly discussed.** Why not! Why is that significant? Perhaps it is because the purpose of the proposed tilapia hatchery is to maintain an exotic tilapia fishery in the Salton Sea as long as possible. Perhaps it is because the exotic tilapia compete with desert pupfish for food and habitat, eat small fish, and are probably a greater threat to the desert pupfish in these drains than other wildlife species, including fish eating birds. Perhaps it is because the proposed hatchery HCP and the proposed desert pupfish HCP are counterproductive to each other. Does it make sense to encourage the survival of exotic tilapia in the Salton Sea to the detriment of native desert pupfish? Does it make sense to promote the hatchery production of tilapia to the detriment of the desert pupfish?

#### AN ALTERNATIVE – MANAGED DELTAS AND ENLARGED MARSH

##### Approach 3.

There may be a more sane and less expensive alternative to the Approach 1 (hatchery) and Approach 2 (conservation) identified in Section 2.2.6.7 in the EIR and Section 3.3 of the HCP (Appendix C of the EIR/EIS).

**Please consider this third approach. Why not, allow the sea to evaporate naturally?** As the shoreline recedes, why not, construct and manage river and stream delta like landforms such as meandering streambeds, islands, marshes, shallow fresh water lakes, and other landforms associated with nearly flat river delta landscapes. As the shoreline recedes, why not, populate these river delta landforms with suitable plant species to attract animal wildlife suitable for this environment -- an environment approximating the environment that once existed in this sea bed not so long ago. On the South end of the basin, the mouths of the New River, the Alamo River, and numerous IID drain canals could be extended and landscaped to better resemble rivers and streams meandering across the bottom of a drying sea. Similarly, the Whitewater flood control ditch and other irrigation and storm drains could be extended to better resemble rivers and streams meandering across the North end of the basin, creating an attractive landforms and useful habitat for many wildlife species. The HCP does propose "mini deltas" (page 3.2-158), this concept should be expand. In other words, **mitigate for and on the receding shoreline!**

This approach will leave Imperial valley with an attractive sustainable wildlife refuge we can be proud of -- a refuge that favors native species over exotic species. This approach can offer a wide variety of sustainable recreational opportunities for valley residents and others. This approach puts to productive use thousands of acres seabed and shoreline the IID or the government already owns. This approach will go a long way in dealing with alleged dust problems that may result as the shore line of the Salton Sea recedes. If done properly, it may

attract funding from a variety of non-profit foundations to further expand and maintain the wildlife habitat.

Best of all, Approach 3 will not leave our valley landscape covered with huge piles of salt, evaporating salt ponds, energy consuming evaporators, and even more idle farmland. Environmental laws and HCPs should have a bias towards sustaining native species and a bias towards returning the environment to its more natural state.

G11-4

The proposed Approach 3 is not a perfect solution, nor is this a perfect world. Whether this approach was previously examined or not, it merits a thorough analysis in the EIR/EIS.

GENERAL OBSERVATIONS

G11-5

The draft EIR/EIS documents are lacking in other respects. For instance, the documents fails to adequately note a water transfer will have far greater environmental consequences on wildlife in the areas receiving the water (because it makes possible further human driven development and habitat destruction) than the proposed water transfer will have on wildlife in the lower Colorado River and the IID service area.

G11-6

Most of the proposed mitigation measures in the EIR/EIS benefit some wildlife species to the detriment of other wildlife species, yet this relationship is neither adequately acknowledged, identified or discussed. An example of this is the relationship between pupfish and efforts to benefit pelicans as discussed above. Another example is the proposal is to plant Tamarisk, an exotic species, as a mitigation measure, yet BLM has an active Tamarisk eradication program in parts of Imperial County. The proposed construction of islands in the Salton Sea clearly favors several bird species over their natural predators, yet this is not acknowledged or discussed. These issues should be discussed.

G11-7

The draft EIR/EIS does not adequately recognize natural fluctuations in wildlife populations or the adaptability and mobility of many wildlife species or how proposed mitigation measures may effect normal animal behavior. Approach 1 of the Salton Sea portion of the HCP is particularly lacking in this regards. For example, how will the production and release of hatchery reared fish for pelicans affect pelican (and other birds) behavior? Will they congregate more than normal making them more susceptible to disease problems? Isn't that a large part of the recent bird health problems at the Salton Sea? Will it affect their normal migration habits?

American white pelican, brown pelican, black-skimmers, and double-crested cormorants.

G11-8

Page 3.2-160 states the primary reason for trying to maintain fish resources in the Salton Sea is to benefit: American white pelican, brown pelican, black-skimmers, and double-crested cormorants. Why single out these species?

G11-9

The "Draft Environmental Impact Statement: Double-crested Cormorant Management" dated 2001 and prepared by the U.S. Department of Interior Fish and Wildlife Service in cooperation with U.S. Department of Agriculture APHIS Wildlife Services found cormorant populations increasing rapidly and were in fact a serious problem – a nuisance species in many areas. The EIR recommended the establishment of a new Depredation Order and other action to reduce cormorant damage and control cormorant populations. Why shouldn't double-crested cormorants be removed from the list of species identified for coverage in the HCP?

Response to Comment G11-5

It is not anticipated that the SDCWA geographic area would experience increased environmental impacts with respect to habitat degradation or further human development as a result of increased growth in the San Diego region because it has been determined that the Proposed Project is not growth-inducing. Please refer to the Master Response on *Other—Growth Inducement Analysis* in Section 3 of this Final EIR/EIS.

Response to Comment G11-6

Please refer to the responses given for Comments G1-4 and G1-5.

Response to Comment G11-7

Approach 1, which included stocking tilapia in the Salton Sea and constructed ponds, has been eliminated from consideration. See Master Response for *Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 3 of this Final EIR/EIS.

Response to Comment G11-8

Regulatory requirements under the ESA and CESA necessitate that priority be given to species listed under the stated or federal Endangered Species Acts. In addition, IID has elected to cover other species in its HCP that are not currently listed to provide long-term certainty with respect to ESA compliance. The conservation measures developed for these species likely will provide ancillary, long-term benefits to other piscivorous birds using the Salton Sea.

Response to Comment G11-9

The double-crested cormorant is a California Species of Special Concern. There is the potential for incidental take of this species under the Proposed Project. IID has included double-crested cormorant in its HCP in order to obtain incidental take authorization and long term-regulatory assurances for take of this species.

**G11-10** [ The HCP acknowledges that brown pelicans will not seriously be impacted by loss of the Salton Sea fishery. They utilize such habitats as the nearby Sea of Cortez (and other ocean areas) and occasionally the lower Colorado River valley. My proposed managed delta and enlarged marsh habit should more than adequately mitigate for the brown pelican -- if mitigation is really justified.

**G11-11** [ 

- Black-skimmers (see page 3.2-153) were not even reported in California until 1962 or the Salton Sea area until five years later. California is not a major nesting area for black-skimmers -- most of them nest in coastal areas along the North coast of the Gulf of Mexico. Now there are several black-skimmer nesting sites along the California coast. Why are black-skimmers singled out for special treatment and mitigation?

**G11-12** [ In recent years there have been serious health problems with the American white pelicans in the Salton Sea area. This may be due, in part, to the large (perhaps abnormal) concentration of pelicans in the area. Surely most of the pelicans will find their way to the nearby Sea of Cortez when the Salton Sea fishery disappears. The EIR/EIS documents do not adequately justify the proposed HCP. Why do American white pelicans receive such a disproportionate share of the mitigation effort proposed for the for the Salton Sea portion of the HCP?

#### ADDITIONAL WATER CONSERVATION

**G11-13** [ If water is diverted at Parker Dam instead of Imperial Dam (143 miles difference), this should result in water conservation because: less evaporation, less loss to infiltration, less loss to transpiration, etc. How much water will be conserved? Shouldn't IID should get conservation credit for this water?

Additionally, by diverting water at Parker Dam there water conservation will occurring in the All American Canal (82 miles) as well because of less evaporation, less loss to infiltration, less loss to transpiration, etc. (with or without lining the canal). How much water will be conserved? Shouldn't IID should get conservation credit for this water?

**G11-14** [ Page 2-50 states "The Salton Sea is an agricultural drainage repository that has no legal entitlement to Colorado River water." Does the Salton Sea have any legal entitlement to agriculture canal or drain water? If so, are their water quality requirements for this water?

#### MISCELLANEOUS

**G11-15** [ Bottom of page 2-49 states "Other approaches that were considered but eliminated from consideration are described in the HCP." Where is this in the HCP? Identify page or section number.

**G11-16** [ Page 2-55, last paragraph -- If the All Canal is lined, who gets the conserved water?

**G11-17** [ Page 3.0-15 Says current salinity of Salton Sea is approximately 46g/L. This is different than elsewhere in the documents.

**G11-18** [ Page 3.2-63 Note: The Arizona Department of Game and Fish stocked tilapia in the canals and tributaries of the Colorado River near Yuma, AZ prior to 1963. Source: "Progress Report of the Culture of Tilapia mossambica (Peters) Hybrids in Southern California," CDFG Administrative Report 66-9, May 1966.

#### Response to Comment G11-10

The comment provides an opinion about issues relating to the brown pelican. See response to Comment G1-12.

#### Response to Comment G11-11

Black skimmers have undergone a natural range expansion in California since 1962. Because black skimmers were not introduced to the Salton Sea and began breeding there without human intervention, they are not considered an introduced species. IID has elected to cover black skimmers in its HCP to provide long-term certainty with respect to ESA compliance.

#### Response to Comment G11-12

IID has elected to cover certain species with special state and/or federal status in its Habitat Conservation Plan. To receive state and federal incidental take permits, IID must minimize and mitigate take of covered species that could occur from covered activities. White pelicans are one of the primary fish-eating bird species covered by the HCP; thus they are a focus of the mitigation strategy of the Salton Sea.

#### Response to Comment G11-13

The amount of water lost to evaporation from open channels, such as the Colorado River and the All American Canal (AAC), is primarily determined by the amount of exposed surface-along with weather variables such as temperature and wind speed. Since the Proposed Project will only result in slightly lower or higher water levels in the Colorado River and the AAC, the actual surface area exposed will be very similar to the conditions that exist without implementation of the Project. Therefore, the changes in evaporation losses will be very small relative to the amount of water proposed for the transfer.

For the same reasons, the difference in seepage losses from the canal and the river will be nearly the same with and without the Project, unless a portion of the canal is lined to prevent seepage, in which case the seepage loss would be credited as water conservation.

**Response to Comment G11-14**

The Salton Sea does not have any legal entitlement to receive surface or groundwater from any source.

**Response to Comment G11-15**

Other approaches considered were described in Section 3.3.3.3 of the Draft HCP. The section has been removed from the Final HCP (Attachment A to this Final EIR/EIS).

**Response to Comment G11-16**

The conserved water from the All American Canal Lining Project would be diverted into the CRA and portions transferred to MWD's service area (56.2 KAFY) and to the San Luis Rey Indian Water Rights Settlement parties (11.5 KAFY).

**Response to Comment G11-17**

The 46 g/L salinity reported on this page is a typographical error. The correct value is 44,918 mg/L or 45 g/L, as reported elsewhere in the document such as in Table 3.1-6. This change is indicated in this Final EIR/EIS in subsection 3.0 under Section 4.2, Text Revisions.

**Response to Comment G11-18**

The section referenced in the comment describes fishery resources in the Salton Sea. It is not appropriate to discuss stocking of tilapia into the Colorado River and its tributaries in this section. Comment noted.

G11-19 [ Page 3.2-90 Fails to note the large number of threatened and endangered species in San Diego County.

G11-20 [ Page 3.2-136 I suggest a larger marsh, but use any drain water (even with high selenium), and locate marsh on drying sea bed as the shoreline recedes. Why? Larger marsh will improve water quality (selenium, silt, etc.) Location on drying sea bed will not take agriculture land out of production.

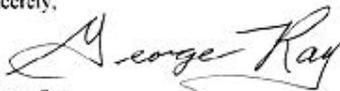
G11-21 [ Page 3.2-152 and Page 3.2-153 -- fails to classify the impact on American white pelican, why?

G11-22 [ 3.2-162 "IID would contribute to the recovery of desert pupfish by constructing and managing a Tier 3 refugium pond to support a population of pupfish consistent with the goals of the Desert Pupfish Recovery Plan (Marsh and Sada 1993)." This may be a good idea, however the amount of contribution is not specified. If the "mini deltas" concept is expanded or if tilapia populations are allowed decrease or if desert pupfish are partly protected from tilapia by allowing the natural direct separation of some drains from the sea, the contribution may not be necessary.

G11-23 [ 3.2-166 Nesting sites – protecting these nesting sites from natural predators means favoring bird species over predators. Why is this justified? Are there other ways to mitigate for this?

G11-24 [ Spokespersons representing The Salton Sea Restoration Authority, the Bureau of Reclamation, US FWS, CDFG, and others have advanced a variety of environmental mitigation proposals regarding the proposed water transfers and restoration of the Salton Sea. Some spokespersons call for the dedication of additional water from IID's entitlement for wildlife. Others call for the abandonment of farm land to permanent fallowing. Some of the proposals regarding the Salton Sea call for the destruction of farm land by building evaporation pond and for the destruction of farm land by accumulating huge piles of salt. This strikes me as substituting an environmental and financial nightmare in place of allowing evaporation to occur in the sea itself. This strikes me as substituting an environmental and financial nightmare for the more natural solution of allowing the Salton Sea basin to return to a state more closely approximating the basin's existence about 100 years ago.

Sincerely,



George Ray

Cc: Mr. Bruce Ellis, Chief  
Environmental Resources Management Division  
USBR, Phoenix Area Office (PXAO-1500)  
Phoenix, AZ 85069-1169

Mrs. Stella Mendoza, President Imperial Irrigation District Board of Directors  
Mr. Mike Cox, President Imperial County Farm Bureau  
Mr. John Hawk, President Imperial Valley Vegetable Growers Association

**Response to Comment G11-19**

On page 3.2-89 the Draft EIR/EIS notes that San Diego County does support a large number of threatened and endangered species.

**Response to Comment G11-20**

During the development of the HCP, consideration was given to forming ponded areas with vegetation as a means to offset Salton Sea impacts. The USFWS and CDFG discouraged this approach because of concerns regarding the development and spread of avian diseases.

**Response to Comment G11-21**

Impacts associated with the Proposed Project on piscivorous birds are discussed in Impact BR-46. Impacts specific to the American white pelican are discussed on Page 3.2-149 and 3.2-150.

**Response to Comment G11-22**

IID's commitment to contribute to the recovery of pupfish includes the creation and maintenance of a refugium pond consistent with the guidance provided in the Desert Pupfish Recovery Plan. The pond would be a minimum of 0.5 acre in size and would be managed to prevent the introduction of competing fish species. We acknowledge that if the factors described in the comment were to occur, the creation of a refugium pond might be unnecessary.

**Response to Comment G11-23**

Black skimmer, double-crested cormorant, gull-billed terns and pelicans currently nest and roost on islands that are currently inaccessible to land-based predators. Water conservation under the Proposed Project would cause islands to become connected with the mainland earlier than under the No Action scenario. IID has elected to cover black skimmers, double-crested cormorants, gull-billed terns, brown pelicans and white pelicans in its HCP. To receive state and federal incidental take permits, IID must minimize and mitigate take of covered species that could occur from covered activities. Under the Salton Sea Conservation Strategy of the HCP, this potential impact of water conservation would be avoided.

**Response to Comment G11-24**

The comment is a criticism of the Salton Sea Restoration Project, which is not part of the Proposed Project. See Master Response on *Other—Relationship Between the Proposed Project and the Salton Sea Restoration Project* in Section 3 in this Final EIR/EIS.

2750 Fourth Avenue  
P.O. Box 3879  
San Diego, CA 92163-1879  
Phone: 619-297-3901  
Fax: 619-297-8402

1-800-LUNG-USA  
www.lungsandiego.org

1275 West State Street  
El Centro, CA 92243  
Phone: 760-353-5864  
Fax: 760-336-3072

Rafael H. Santos  
Chair

Janie Davis  
President/CEO

**AMERICAN LUNG  
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*of San Diego and  
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April 24, 2002

Mr. Elston Grubaugh  
Manager  
Imperial Irrigation District  
Resource Planning & Management Department  
PO Box 937  
Imperial, CA 92251

Dear Mr. Grubaugh:

The American Lung Association of San Diego and Imperial Counties would like to provide comments to you regarding the Imperial Irrigation District Water Conservation and Transfer Project and Draft Habitat Conservation Plan - Draft Environmental Impact Report/Environmental Impact Statement. Please find our comments below.

**Who We Are**

The American Lung Association of San Diego and Imperial Counties (ALA SD/IC) is an affiliate of the national American Lung Association, which was founded in 1904. We have served the San Diego community since 1946 and established an office in Imperial County in 1977. The ALA SD/IC is a 501 (c) 3 nonprofit health organization and our mission is to prevent lung disease and promote lung health. Toward that end, we conduct education, public policy and research programs in the areas of tobacco prevention, asthma, tuberculosis and environmental health.

**Our Concerns about the Water Transfer Project**

The ALA SD/IC has read the IID Water Conservation Transfer Project EIR/EIS and we have serious concerns about the respiratory health consequences that will occur through the Proposed Water Transfer Project and Alternatives 2, 3 and 4. Specifically, we have concerns that:

1. Unhealthful levels of airborne dust (Particulate Matter 10) will be generated from the proposed fallowing of farmland.
2. Unhealthful levels of airborne dust (Particulate Matter 10) will be generated from the proposed plan to remove so much water from the Salton Sea that it will shrink by about one-third of its current size and thus expose a significant amount of shoreline.
3. Exposure of Imperial County residents to toxic carcinogenic particles such as selenium, cadmium and arsenic which are contained in the soil of the sea bottom (due to pesticide-laden farm irrigation runoff) and would become airborne and thus inhaled into the lungs.

**Letter - G12. American Lung Association.  
Signatory - Jan Cortez.**

**Response to Comment G12-1**

Please refer to the Master Responses on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan*, *Air Quality—Air Quality Issues Associated with Fallowing*, and *Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 3 of this Final EIR/EIS.

**Response to Comment G12-2**

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

**Response to Comment G12-3**

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 G12-4**

Please 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.

G12-1

G12-2

G12-3

G12-4

**When You Can't  
Breathe,  
Nothing Else  
Matters®**

ALA SD/IC IID Water Transfer Project EIR/EIS Comment Letter  
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G12-5

The American Lung Association has serious concerns that the dust impacts of the project can be fully mitigated. However, if the project is approved it is essential that mitigation take place in order to protect the lung health of residents. Mitigation of the Salton Sea and related dust impacts is a priority concern of the American Lung Association because of the large extent of PM-10 pollution and toxic air impacts that could occur from this source. Imperial County already does not meet Federal and State clean air standards for particulate matter and has the highest asthma hospitalization discharge rates in California.

G12-6

**The EIR/EIS Urges Caution**

The IID Water Conservation and Transfer Project EIR/EIS states in Table 3.7-1 Summary of Air Quality Impacts that "Potentially significant and unavoidable impacts" will occur in the Salton Sea sub region of the Proposed Project and Alternative 2, 3 and 4 if mitigation does not occur. Dust emissions generated from the Salton Sea sub region will also impact Imperial County.

The EIR/EIS also states that within the IID Water Service Area the Proposed Project and Alternatives 3 and 4 will "have less than significant impacts with mitigation".

**Mitigation**

If the project is approved in a form that results in fallowing of farmland and related increased dust emissions, it will be essential to mitigate these emissions. The EIR/EIS recommends certain mitigation steps. The ALA SD/IC agrees with these as a starting point, other additional mitigation measures may be needed to further reduce dust levels in order to protect public health. Further, the EIR/EIS states that only one of these mitigation measures will be needed to reduce dust. We disagree with this, and recommend that as many of these mitigation measures as possible be implemented to reduce dust to the lowest levels possible.

\*Implement conservation cropping sequences and wind erosion protection measures as outlined by the US Department of Agriculture Natural Resources Conservation Service, such as:

- Plan ahead to start with plenty of vegetation residue, and maintain as much residue on fallowed fields as possible. Residue is more effective for wind erosion protection if left standing.
- If residues are not adequate, small grain can be seeded about the first of the year to take advantage of the winter rains and irrigated with a light irrigation if needed to get adequate growth.

**Response to Comment G12-5**

Comment noted. Mitigation of potential dust impacts is also a priority concern of the IID.

**Response to Comment G12-6**

Please refer to the Master Responses on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan*, *Air Quality—Air Quality Issues Associated with Fallowing*, and *Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 3 of this Final EIR/EIS.

-Apply soil stabilization chemicals to fallowed lands.  
ALA SD/IC IID Water Transfer Project EIR/EIS Comment Letter  
April 24, 2002, Page 3

G12-6

-Reapply drain water to allow protective vegetation to be established.  
-Reuse irrigation return flows to irrigate windbreaks across blocks of land including many fields to reduce wind fetch and reduce emissions from fallowed, farmed, and other lands within the block. Windbreak species, management and layout should be optimized or achieve the largest feasible dust emissions reduction per unit water available for their irrigation. Windbreak corridors could provide ancillary aesthetic and habitat benefits.  
-Install air pollution monitors to determine if mitigation measures are adequately reducing dust levels from fallowed lands.

**Response to Comment G12-7**

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 G12-8**

Comment noted.

**Salton Sea**

The ALA SD/IC recommends these mitigation actions to reduce dust emissions from a shrinking Salton Sea resulting from the proposed water transfer project.

G12-7

-Slow draining of water from this source and replenish whenever possible.  
-Stabilize and/or encapsulate exposed sea bottom and shoreline so that dust cannot easily become airborne.  
-Utilize other dust mitigation methods, which have proven to be effective for reducing airborne dust from projects such as Owens Lake.  
-Install air pollution monitors to determine if mitigation measures are adequately reducing dust levels from Salton Sea water transfer impacts.

**How Much Will Dust Mitigation Cost?**

Based on data collected from the American Lung Association to date, the anticipated cost of dust mitigation due to the shrinking Salton Sea related to the lifetime of the project is a minimum of \$200,000,000. While still under investigation, mitigation of fallowed lands is anticipated to be \$50,000,000 over the lifetime of the project. Thus, the total minimum appropriation needed for dust mitigation that would protect public health would be \$250,000,000 over the lifetime of the project. Therefore, it is very important to ensure that adequate levels of funding are made available to mitigate dust impacts from the proposed project if approved.

G12-8

Thank you for your consideration of the American Lung Association's comments to the EIR/EIS. Should you have any questions, please do not hesitate to contact me at (619) 297-3901.

Sincerely,



Jan H. Cortez, M.P.H.

Vice President, Research and Environmental Health



New Mexico Field Office  
824 Gold Avenue, SW  
Albuquerque, NM 87107  
Telephone: 505-248-0116  
Fax: 505-248-0187

April 25, 2002

Mr. Bruce Ellis, Chief  
Environmental Resources Management Division  
Bureau of Reclamation  
Phoenix Area Office  
P.O. Box 81169  
Phoenix, AZ 85069-1169

*Via Fax (602-216-4006) and Mail*

Dear Mr. Ellis:

Defenders of Wildlife (Defenders) submits the following comments on the proposed Imperial Irrigation District Water Conservation and Transfer Project and Draft Habitat Conservation Plan, Draft Environmental Impact Report/Environmental Impact Statement (Transfer DEIS) on behalf of its approximately 470,000 members and supporters. This letter supplements another letter submitted by Defenders and other organizations on the Transfer DEIS. Defenders has also submitted comprehensive comments on the Implementation Agreement and Inadvertent Overrun Payback Policy DEIS, and Quantification Settlement Agreement (QSA) DEIR, and submits these comments as applicable to the environmental review in each of these documents.

First, we want to reiterate the Defenders supports all efforts aimed at reducing California's reliance on Colorado River water. We agree that the benefits of reductions in California's consumption of river waters will accrue to the entire basin. However, as currently constructed, each of the elements of the QSA will result in immediate, adverse impacts to much of the basin, extending into the delta. Reallocation or surplus or conserved water and reoperation of Bureau of Reclamation (BOR) facilities must not result in significant environmental and socioeconomic impacts. Individual letters on these projects illustrate the failure to adequately assess environmental impacts and identify mitigation measures. One of the primary causes of the inability to give a hard look at the impacts of these actions is the unacceptable practice of segmenting these environmental analyses, thereby deferring and/or isolating the impacts that are individually and cumulative significant.

By contracting the scope of the NEPA review for this, and for related, projects, BOR has failed to afford the public a meaningful analysis of the cumulative and synergistic effects of the proposed project, and those related to it.

As it issues separate EISs for the All-American Canal lining, the Coachella Canal lining, the Interim Surplus Guidelines, the Implementation Agreement and Inadvertent Overrun and Payback Policy, and the Imperial

**Letter - G13. United Farm Workers of America, AFL-CIO. Signatory - Kara Gillon.**

**Response to Comment G13-1**

Comment noted.

**Response to Comment G13-2**

Please refer to the Master Response on *Other—Relationship Between the Proposed Project, QSA, IA, IOP, and CVWD Groundwater Management Plan* in Section 3 of this Final EIR/EIS.

G13-1

G13-2

National Headquarters  
1101 Pennsylvania Avenue, NW  
Suite 1400  
Washington, DC 20005  
Telephone: 202-682-9400  
Fax: 202-682-1311  
www.defenders.org