the Sea come from the Los Angeles County area. Some 80% of the people that visit the Salton Sea State Recreation Area come from L.A. County. This is significant when one understands that if the Sea fails it will be the huge southern California population base of L.A. County that will be affected most (Horvitz 2002).

G17-67

2. The Salton Sea has a huge recreational importance to California, particularly to Southern California, which has few recreational venues and a growing population demographic that favors aquatic recreation. Lakes and rivers in Southern California fill with boaters quickly. In fact Lake Perris, that rests a short hour an a half west of the Salton Sea, fills to capacity with boaters early each summer weekend day. It fills to the degree that park staff directs boaters to line up at the entrance gates waiting for room on the lake. The lower Colorado River is heavily and dangerously impacted by a huge number of boaters from California. Due to this compaction, many accidents, injuries, and deaths occur on the river each season. The number one cause of vessel accidents in California is compaction: boats operating in close proximity to each other. Southern California is in need of aquatic recreation venues and the Salton Sea can accommodate that need. It is the largest lake in the state with some 360 square miles of water surface. Because of its recreational potential, from its creation through today and hopefully into the future the Sea has been, and will be, the site of human recreation and enjoyment (Horvitz 2002). Please explain why this was not taken into account in the IID EIR/EIS.

G17-68

3. In 1971, the California Department of Fish and Game recorded recreational fish catches at the Salton Sea at 1.88 fish per angler hour, one of the highest catch rates recorded in the state. (Ralph Riedel et al., "Final Report: Fish Biology and Fisheries Ecology of the Salton Sea, p. 3.) The 9-fish limit for corvina was frequently attained, and many times exceeded 100 pounds of fish, with corvina over 20 pounds common. Now you would think, that with fisheries of this abundance, the IID EIR/EIS would provide some mitigation for anglers. The IID EIR/EIS acknowledges that as many as 400,000 anglers fish at the Salton Sea every year, but there is no mitigation at all for the impacts the transfer may have on sportfishing. Consider what those impacts could be. If the transfer speeds up the day when the Sea can no longer sustain fish by five years, less than most estimates, that's 2 million angler days lost - with no mitigation. If the transfer will speed up the day when the Sea can no longer support fish by approximately 10 years, which is a more common estimate, that is 4 million angler days lost - with no mitigation (Karr 2002). Please explain.

G17-69

4. The IID EIR/EIS does not give enough emphasis to the private facilities that anglers use at the Sea. In fact, there are days when hundreds of anglers line up alongside the Cleveland Street drain in North Shore catching tilapia. And exactly the same thing occurs at Red

G17-70

Response to Comment G17-68

The implementation of HCP Approach 2 (now referred to as Salton Sea Habitat Conservation Strategy) will avoid impacts from the Project to fish and to fish-eating birds. For additional information see the Master Response on *Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 3 of this Final EIR/EIS.

Response to Comment G17-69

The implementation of HCP Approach 2 (now referred to as Salton Sea Habitat Conservation Strategy) will avoid impacts from the Project to fish and to fish-eating birds. For additional information see the Master Response on *Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 3 of this Final EIR/EIS.

Response to Comment G17-70

The implementation of HCP Approach 2 (now referred to as Salton Sea Habitat Conservation Strategy) will avoid impacts from the Project to fish and to fish-eating birds. For additional information see the Master Response on *Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 3 of this Final EIR/EIS.

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Hill, Black Rock, the Steam Wells, the Navy Base, The Keys, Salton City, Lido Palms, Salton Sea Beach, Desert Shores, Whitewater and the Johnson Street drain. Most boaters, in fact, launch from the private boat ramps--not at the State Park (Karr 2002). Where will those millions of angler days be spent if the Sea is dead? Where will the additional millions of angler days be spent in the future if we lose the best fishing in the state, and lose what could be a huge playground only a few hours drive from Metropolitan Los Angeles and San Diego? How would you replace the huge and thriving ecosystem that is Salton Sea after the devastating ecological loss of millions of fish and habitat that is host to over 400 species of birds in Southern California, threatened and endangered species, and a recreation area that can offer untold fishing, boating and recreation for the population masses in Southern California?

G17-70

5. The IID EIR/EIS acknowledges that the current surface area of the Salton Sea (364 square miles) will be reduced to 261 square miles with completion of the proposed project. Despite the reduction of over 100 square miles of surface area, the IID EIR/EIS concludes that this will not significantly impact water-related recreation. Instead of recognizing the obvious decrease of over 1/3 of the surface area of the lake and the clear impacts that will have on water related recreation, the IID EIR/EIS comes to its conclusion by relying on an average number of visitors per day divided by square miles of surface area. What this fails to recognize is that the 475,000 people that visit the Salton Sea yearly do not visit the sea at the rate of 1,300 visitors per day. Instead, those 475,000 visitors are concentrated on weekends and holidays and only at certain times of the year. In order to determine impact, the analysis should have looked at high-season usage of the sea and the likely impacts of a reduction of over a third of the surface area. Clearly this entire analysis needs to be redone and appropriate mitigation measures established for the clearly significant environmental impacts.

G17-71

6. The IID EIR/EIS acknowledges that the project will significantly impact sport fishing opportunities but concludes that this impact is unavoidable. Clearly, the impacts are not unavoidable if appropriate mitigation measures are implemented. The IID EIR/EIS indicates that the HCP Approach 2 (Salton Sea Portion) is the only effective mitigation measure to reduce this impact to insignificance. Since this mitigation is clearly feasible, there is no reason not to require it as part of project approval. Failure to do so would violate the CEQA requirement that all feasible mitigation that reduces significant impacts to insignificant must be employed.

G17-72

Response to Comment G17-71

With the implementation of the Salton Sea Habitat Conservation Strategy as described in the Master Response on *Biology—Approach to Salton Sea Habitat Conservation Strategy* (in Section 3 of this Final EIR/EIS), the elevation of the Salton Sea will not begin to decline until at least the Year 2030, and the ultimate elevation under the Proposed Project would be approximately -240 ft msl, reducing the surface area of the Salton Sea by approximately 16,000 acres (or 25 square miles). This is one-quarter of the reduction that was projected under HCP Approach 1. As the commenter states, primary recreation use of the Sea is associated with the fishery. The Salton Sea Habitat Conservation Strategy mitigates Project impacts to fish. Since it can be assumed that recreation use would decline under the Baseline once fish are no longer able to reproduce, the Project impacts associated with the decline in surface area are still not considered to be significant.

Response to Comment G17-72

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

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Bruce D. Ellis
Bureau of Reclamation
Elston Grubaugh
Imperial Irrigation District

K. **Air Quality.**

G17-73

1. Many of the sediments encountered within the Salton Sea, especially the upper most layers of sediments, consist of very fine grained sediments comprised of high percentages of silt and clay sized particles. If elevated wind conditions occur, the sediment could become air borne and travel great distances. Exposure to these sediments would not only become a health issue as a result of PM-10 values but also as a result of exposure to the organic and inorganic contaminants that have been accumulating in the Salton Sea sediments from agricultural runoff. Increased exposure from inhalation may occur with respect to arsenic, cadmium, copper, lead, molybdenum, nickel, selenium, zinc, DDT, DDD, DDE, and dieldrin. In addition, typically some of these particulates containing these constituents will not be inhaled directly into the lungs of those exposed but may fall out in the air passage and be later ingested with mucus. In addition, the maximum arsenic concentrations observed at the Sea if airborne at PM-10 levels of greater than 150 micrograms per cubic meter could result in ambient concentrations of arsenic of 0.001065 micrograms per cubic meter which are well in excess of the EPA Region 9 PRGs for arsenic in ambient air of 0.00045 micro grams per cubic meter (Vogl 2002). Why is this not addressed in more detail in the IID EIR/EIS?

G17-74

2. The EPA has established PM_{10} and $PM_{2.5}$ (ultra-small particles less than 2.5 microns) standards for air quality. Both Imperial County and recently the Coachella Valley have been deemed "non-attainment" zones, failing to meet the air quality criteria for PM_{10}. No air quality model or detailed analysis of potential dust emission has been completed at the Salton Sea. However, given the magnitude of exposure of sediments resulting from water transfers and other reductions of inflow to the Sea (86-140 square miles for the Salton Sea, compared with 31 square miles of dust emitting surface at Owens Dry Lake), if even a fraction of the Salton Sea lake bottom generates windborne dust, PM_{10} levels would be expected to worsen relative to the basin's already poor air quality. The health effects of PM_{10} are well documented. The basin's nonattainment status for PM_{10} is reflected by some of the worst incidence of respiratory disease in the State. Imperial County leads the State in childhood asthma hospitalizations of children aged 0-14 by more than twice the state average (CDHS 2000). This may be correlated to the already high levels of PM_{10} experienced in the dry desert environment of the region. Suffice to say, any additional impacts of reduced air quality on human health will only exacerbate this problem (Vogl 2002). Why are these not considered significant effects?

G17-75

3. Much of what has happened at Owens Lake could happen at the Salton Sea, if the Sea's water supply is simply diverted. Although there are a number of differences between the two lake basins, there are enough close similarities to be concerned. The IID

Response to Comment G17-73

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 G17-74

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 G17-75

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

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EIR/EIS inadequately addresses the potential problems-it devotes less than three pages to the potential air quality impacts-and concludes that there would be potential significant unavoidable environmental impacts, but it provides no real mitigation measures. The IID EIR/EIS admits that the proposed water transfer would cause at least 50,000 acres (78 square miles) of sea bed sediments to be exposed and that this newly exposed area would have the potential for dust suspension. But it goes on to say that the many variables "prevent any reasonable quantitative estimate of emissions and associated impacts from the exposed shoreline." It then goes on to state that a "qualitative assessment' will be provided. A "qualitative assessment" was inappropriate for the Water Board during their Mono Lake decision; it was also inappropriate for the California Air Resources Board and the USEPA during the development of the air plans for Mono and Owens Lakes. In those cases, extensive research, testing and modeling allowed for a reduction in the uncertainties regarding the many variables that affect dust emissions. With uncertainties reduced, it was possible to construct air quality models that closely matched actual conditions (Schade 2002). There is absolutely no reason why such an effort cannot take place for the proposed Salton Sea sediment exposure. Even a crude modeling effort would give an indication of the potential magnitude of the problem.

G17-75

4. The IID EIR/EIS states that factors such as moisture, dried algal mats, effloresecent salt crust and the presence of sulfate salts would inhibit the suspension of dust. These are precisely some of the factors that make the dust problem at Owens Lake so bad. High levels of soil moisture transport saline shallow groundwater to the surface where the water evaporates and a puffy, emissive salt crust can form (St.-Amand 1987). Algal mats are often not stable when they dry, crack and curl. Then in addition to salt and soil, the dust contains algae particles. The sodium sulfate salts present form a very unstable surface when they form at temperatures below about 50 °F (St.-Amand 1987, Fig. 7). This means that stable crusts will form during the heat of summer, but puffy, unstable crusts will form during the colder temperatures of winter, when winds typically are stronger and more frequent.

G17-76

5. The IID EIR/EIS also states that the "low frequency of high wind events... would inhibit the suspension of dust." Then in the next paragraph, "On occasion, existing concentrations of PM-10 in the Salton Sea area violate national and state ambient air quality standards". These violations are caused by the wind. The Salton Sea area has a serious nonattainment status of both the federal and state PM-10 standards. The largest component in the PM-10 emission inventory is "fugitive windblown dust". Research at Owens Lake has shown that unstable lake bed surfaces typically begin emitting dust at about 17 miles per hour (7.5 meters per second) (GBAPCD 1998, pg. 4-6). The windrose diagrams in the IID EIR/EIS

G17-77

Response to Comment G17-76

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 G17-77

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

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(figs. 3.7-6 and 3.7-6) (which according to the Imperial County APCD's consultant are incorrect) both show that there are winds present above the typical threshold wind speed used at Owens Lake. Even if these winds are infrequent, they may well be sufficient to cause dust emissions-local winds certainly cause dust emissions elsewhere in the air basin, as evidenced by the emission inventory. Adding 70 square miles of potentially emissive surface in an area that already experiences violations of the PM-10 Standard due to wind is not a potential significant environmental impact to be "qualitatively" explained away.

G17-77

6. The IID EIR/EIS compares the Salton Sea to Owens Lake and states, "Fortunately, conditions found to produce dust storms on dry salt lake beds, such as Owens Lake, were not found to be present at the Salton Sea." It then presents one page of semi-technical discussion arguing why Owens Lake is not like the Salton Sea. Only one reference is provided and much of the information is simply incorrect. With regard to soil chemistry, it argues that because the types of salts are different at each lake, Salton Sea will not form the unstable crusts found at Owens Lake. While it may be true that Owens Lake salts tend to fog very emissive surfaces, there is no indication that the salt crusts that will form on Salton Sea sediments will be completely stable. The sodium sulfate salts present at Salton Sea can also form emissive crusts under the correct conditions (the presence of soil moisture and low temperatures). The IID EIR/EIS states that "the frequency of high wind events at the Salton Sea is less than at Owens Lake." That may be true, but winds strong enough to cause dust emissions must occur at the Salton Sea. The fact that windblown fugitive dust makes up the largest component of the local PM-10 emission inventory means that the wind does blow often enough and strong enough to make the area nonattainment for the PM-10 Standard. Finally, the EIR/EIS attempts an argument that the predicted slower rate of Salton Sea recession "may" allow natural processes to control dust emissions. The development of "relatively stable dunes" and "relatively stable crusts" are vaguely predicted. This is unsubstantiated. Owens Lake has been dry for almost 80 years. Natural processes are acting to stabilize the surface, but this will probably take hundreds of years to make a difference.

G17-78

7. An issue completely ignored in the IID EIR/EIS air quality discussion is the possibility of air toxics that could be contained in the dust. Elevated levels of PM-10 are considered to be a health risk not because of what the dust is made of, but rather because the very small particles lodge deeply in the lungs (Schade 2002). Toxic materials in the dust only add to the health risk. Elevated levels of naturally-occurring arsenic and cadmium in the sediment at Owens Lake increase the lifetime cancer risk from those toxics by 24 per million (GBAPCD 1998, pg. 3-12). Sediment analyses at the Salton Sea indicates that dust emissions there could

G17-79

Response to Comment G17-78

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 G17-79

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.

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G17-79 potentially contain many more toxic materials, including pesticides and uranium (LFR Levine-Fricke 1999).

G17-80 **8.** At least 78 square miles (50,000 acres) of lake bed would be exposed if water is diverted from the sea. This is over twice as much potentially emissive area as Owens Lake's 35 square miles (GBAPCD 1998, Ch. 4). Assume that, for all the unsubstantiated reasons presented in the IID EIR/EIS, an acre of sediment at the Salton Sea is only one-hundredth to one-tenth (1% to 10%) as emissive as an acre at Owens Lake. This means that instead of peak 24hour concentrations of 15,000 to 20,000 ug/m^3 like those at Owens Lake, the Salton Sea area would see concentrations of between 300 and 4,000 ug/m^3. These potential concentrations are well above the Federal Standard of 150 ug/ m^3 (Schade 2002). No one can say that the water diversions will not cause a serious air quality problem at the Salton Sea without significantly more study, analysis, research, modeling and testing. And if this work indicates that there could be an air quality problem, a plan to take care of it must be in place before the IID EIR/EIS is certified.

G17-81 **9.** The IID EIR/EIS acknowledges that wind blown dust from the exposed Salton Sea shoreline will cause a significant air quality impact. It also acknowledges that HCP Approach 2 (Salton Sea Portion) is the only effective mitigation measure. However, it concludes that until an HCP approach for the Salton Sea is selected, the impact will remain potentially significant and unavoidable. Again, as noted above, CEQA requires that all potentially significant impacts must be mitigated if there are feasible mitigation measures. Clearly, HCP Approach 2 is a feasible mitigation measure and thus it, or some other similar mitigation, must be implemented as part of the project approval.

G17-82 **10.** In discussing construction methodology under Section 3.7.4, the IID EIR/EIS indicates that construction emission estimates prepared for this air quality analysis did not include fugitive dust emissions associated with soil disturbance. According to the discussion, this is because normal operations at farms involve so much soil disturbance that installation of the conservation measures is assumed to be within the range of typical activity. Your analysis therefore fails to evaluate the cumulative impacts of fugitive dust emissions caused by soil disturbance activities from the proposed project added to the baseline of normal operations at farms. Similarly, you have failed to evaluate the cumulative impacts of operation and maintenance activity expected for on-farm conservation measures added to the normal activities in the area.

Response to Comment G17-80

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

Response to Comment G17-81

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 G17-82

Please refer to the Master Responses on *Air Quality—Emissions from Construction of Conservation Measures* and *Air Quality—Aggregate Emissions from the Salton Sea, Fallowing and Construction* in Section 3 of this Final EIR/EIS.

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G17-83 **11.** The significance criteria for air quality ignores de minimis impacts caused by construction and operation. The deminimis approach is contrary to establish caselaw holding the contribution by a proposed project to an existing cumulative impact may be cumulatively considerable even if it is relatively minor and could be characterized as insignificant. (*Kings County Farm Bureau v. The City of Hanford* (1990) 221 Cal.App.3d 692).

G17-84 **12.** Table 3.7-12 estimates a range of annual equipment exhaust emissions for construction depending upon the type of conservation measure used. However, the combination of conservation measures likely to occur would likely result in compounded emissions rather than a straight proportion to the amount of water conserved. The upper range of emissions is likely to be considerably higher than the highest emissions related to one particular conservation measure.

G17-85 **13.** BMPs applied under Mitigation Measure AQ-2 includes watering excavated soil twice daily. Please evaluate the impacts of water use hydrology and water quality associated with this wetting process.

G17-86 **14.** Mitigation Measure AQ-3 includes light irrigation for small grain growth. Impact HCP-AQ-5 includes a temporary increase in PM10 emissions, temporary increases in soil erosion and increase in traffic and transportation impacts from construction activities. The temporary nature and long-term benefit does not resolve the potentially significant interim impacts.

G17-87 **15.** Impact HCP2-AQ-6 indicates emissions would be about 60% of those shown in tables 3.7-12 and 3.7-13. You have failed to evaluate the cumulative impacts of the 12 KAFY from the HCP added to the 20 KAFY from the proposed project. Assuming cumulative impacts of 160% of those emissions shown on tables 3.7-12 and 3.7-13, non-attainment pollution exceeds the de minimis threshold (assuming the deminimis threshold does not violate case law). This same comment applies to all of the alternatives relying on HCP Approach 2.

G17-88 **16.** Under Impact AQ-7 regarding indirect air quality impacts due to windblown dust from the exposed shoreline of Salton Sea, you have failed to explore other feasible mitigation beyond the HCP Approach 2. For example, sprinkler and irrigation systems to moisten exposed shoreline are used in other receding lakes in California.

G17-89 **17.** Impact AQ-8 concludes that objectionable odors would not affect a substantial number of people. However, the recreation portion of the IID EIR/EIS acknowledges

Response to Comment G17-83

Please refer to the Master Responses on *Air Quality—Emissions from Construction of Conservation Measures* and *Air Quality— Aggregate Emissions from the Salton Sea, Fallowing, and Construction* in Section 3 of this Final EIR/EIS.

Response to Comment G17-84

Please refer to the Master Response on *Air Quality—Emissions from Construction of Conservation Measures* in Section 3 of this Final EIR/EIS.

Response to Comment G17-85

Watering of excavated or exposed soil during construction activities is a widely accepted and effective measure for reducing dust emissions. Since the water volumes involved are quite small, significant runoff or associated water quality impacts are unlikely.

Response to Comment G17-86

Please refer to the Master Responses on *Air Quality—Emissions from Construction of Conservation Measures* and *Air Quality— Consistency with the State Implementation Plan for PM10* in Section 3 of this Final EIR/EIS.

Response to Comment G17-87

Equipment exhaust emissions estimated for construction of conservation measures for transfer (maximum estimated annual amount for conservation of 20 KAFY) should not be summed with potential equipment exhaust emissions for construction of conservation measures for HCP Approach 2 (now referred to as Salton Sea Habitat Conservation Strategy) (maximum estimated annual amount for conservation of 12 KAFY). Make-up water for HCP Approach 2 will not be produced through conservation measures.

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Response to Comment G17-88

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

Response to Comment G17-89

As stated in the Draft EIR/EIS, odors in the Salton Sea are most likely primarily associated with the effects of eutrophication. Eutrophication occurs as a result of nutrient inflows from agricultural drainage. In this process, algae production is limited by the availability of phosphorus. When the algae respire, dissolved oxygen is consumed from the Sea. Dissolved oxygen deficits are thought to be responsible for fish die-offs which contribute to odor problems at the Salton Sea. Decomposition and sulfate reduction processes are also likely contributors to odors. TMDLs for phosphates in the New and Alamo Rivers are expected to be proposed to reduce loading of phosphates in the Salton Sea. Implementation of these TMDLs could be expected to result in reduced odor occurrences. Refer to the on *Hydrology—TMDLs* in Section 3 of this Final EIR/EIS.

With the Proposed Project, implementation of the Salton Sea Conservation Strategy will maintain Baseline inflows into the Sea until about 2035. Depending on the source water used for mitigation water, the loading of phosphates could remain the same as the Baseline or be improved. After 2030, when IID's obligation to maintain salinity levels in the Salton Sea at Baseline conditions ceases, inflows to the Salton Sea will fall below Baseline levels. At that point, unless a Restoration Project has been successfully implemented, it is expected that the fishery will have ceased to reproduce and will no longer exist. Thus odors from fish die-offs will not be a factor. Also, after 2035, inflows to the Sea will be reduced, also reducing the loading of phosphorus into the Salton Sea. Although the Sea will be decreasing in size at the same the time flows are reduced, the effects of the implementation of the TMDLs could result in an improved condition in terms of the loading of TMDLs in relationship to the amount of water in the Sea.

Given the complexity of the interrelationship of phosphate inputs, water quantity and water quality, it is not possible to quantify a change in odor that could be expected from implementation of the Project. However, compared to the existing condition and projected ongoing eutrophication conditions at the Salton Sea, the effects of the Proposed Project on odors is expected to be less than significant, as stated in the Draft EIR/EIS.

G17-89 up to 750,000 visitors per year to the Salton Sea. Please explain how 750,000 visitors to the Salton Sea do not constitute a substantial number of people.

L. **Aesthetics.**

G17-90 1. As noted before, CEQA requires that all feasible mitigation measures be employed to reduce potentially significant impacts to less than significant impacts. The IID EIR/EIS acknowledges that there will be significant impacts on aesthetics resulting from the project-related decrease in the elevation of the Salton Sea. However, the only mitigation measures proposed involve a relocation of recreation facilities closer to the water's edge rather than addressing the full scope of aesthetics impacts from the project. The only mitigation measure that will fully mitigate against the impacts on aesthetics is implementation of HCP Approach 2 (Salton Sea Portion). This should be included in the IID EIR/EIS as a mitigation measure for this impact.

G17-91 2. The IID EIR/EIS acknowledges that the reduction of water flowing into the Salton Sea will increase odors near the sea. However, it concludes that the increases in odors will not be significant because, under baseline conditions, there will be other fish kills that will contribute to odor emissions. This conclusion makes little sense. The question should be whether the proposed project will result in or contribute to odors that will have a negative aesthetic impact on the surrounding community. The answer to that question is clearly yes and therefore should be considered a significant impact subject to mitigation measures. As noted before, the only mitigation measure that will fully mitigate for this impact is implementation of HCP Approach 2 (Salton Sea Portion).

G17-92 3. Under HCP Approaches 1 and 2, the IID EIR/EIS failed to evaluate the visual impacts of fish ponds and the concentration of feeding birds.

M. **Cumulative Impacts.**

G17-93 1. An EIR must discuss a cumulative impact if the project's incremental effect combined with the effects of other projects is "cumulatively considerable." 14 Cal. Code Regs. § 15130(a). The purpose of the cumulative impacts analysis is to avoid considering projects in a vacuum because failure to consider cumulative harm may risk environmental disaster. Without this analysis, piecemeal approval of several projects with related impacts could lead to severe environmental harm. The cumulative impact from several projects is the change in

Response to Comment G17-90

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

Response to Comment G17-91

See response to Comment R5-6.

Response to Comment G17-92

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

Response to Comment G17-93

The comment correctly characterizes the description of cumulative impacts under CEQA. No response required.

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G17-93 the environment that results from the incremental effect of the project when added to other closely-related past, present and probable future projects.

G17-94 2. The CEQA guidelines set forth two methods for satisfying the cumulative impacts analysis requirement: the list of projects approach, and the summary of projections approach. Under either method, the EIR must summarize expected environmental effects of the project and related projects, provide a reasonable analysis of cumulative impacts, and examine reasonable options for mitigating or avoiding the project's contribution to any significant cumulative impacts.

G17-95 3. As noted above, in numerous instances the IID EIR/EIS fails to adequately assess or note significant cumulative impacts or provide for appropriate mitigation.

N. **Public Services and Utilities.**

G17-96 1. Impact PSU-1 indicates that the proposed diversion of water at Parker Dam will result in a decrease in power generation of nearly 19.5 mWh per year. The IID EIR/EIS concludes that this impact is less than significant because the loss in power generation is small when compared with the fluctuation in gross generation over the last 15 years. This is an inappropriate and arbitrary threshold of significance. The historical fluctuations over the last 15 years is irrelevant to the fact that the diversion of 300 KAFY will forever prevent Parker Dam from maximizing its power generation capability. 19.5 mWh is roughly equivalent to the electricity needed to supply 15,000 to 20,000 homes in Southern California. Please explain how the loss of power generation to at least 15,000 homes is a less than significant impact, particularly at a time when the state is in an energy crisis.

G17-97 2. Similarly, Impact PSU-5 acknowledges a loss of 24,000 kWh in annual power generation from the AAC which you dismiss because it is less than 10% of the overall power generated from the AAC. Again, this threshold of significance is arbitrary and irrelevant.

G17-98 3. You failed to evaluate the impacts of replacing the lost power generation due to the diversion at Parker Dam. This lost power generation would likely have to be compensated by increased power from fossil fuels rather than the clean renewable energy source at Parker Dam.

G17-99 4. Under Impact PSU-2, you failed to quantify the lost energy at Headgate Dam except to indicate it is approximately 5.37% of the gross generation capacity. Again, the

Response to Comment G17-94

The comment correctly characterizes the methods for describing cumulative impacts under CEQA. No response is required.

Response to Comment G17-95

With the exception of the significant, unavoidable cumulative impact to agricultural resources, which was identified in Chapter 5 of the Draft EIR/EIS, the cumulative impact analysis did not find any new significant impacts that are not already significant impacts of the Proposed Project by itself, and are being mitigated by the Lead Agencies to the extent feasible. Implementation of the HCP, and other mitigation measures set forth in the Draft and Final EIR/EIS, will reduce Proposed Project-related significant impacts to a level that is less than cumulatively considerable. Significant, unavoidable impacts will, however, remain significant and unavoidable. Please refer to Comment S5-48.

Response to Comment G17-96

We do not agree with the comment that the proposed water diversion of 300 KAFY will forever prevent Parker Dam from maximizing its power generation capability. Reclamation will continue to daily maximize generation at Parker Dam as it has in the past. During average year conditions Parker would be affected by the 300 KAF of water diversions but this does not mean that Parker Dam would be prevented from maximizing its power generation.

Improvements to generation facilities at Parker Dam are planned that will largely mitigate the loss of generation. These improvements will move forward regardless of the outcome of the proposed water transfers.

The 19.5 MWh Parker Dam generation decrease number cited in your comment should be 19,200 MWh as stated in Section 3.12.4.3 in the Draft EIR/EIS. The 19,200 MWh is in reference to all the generation produced at Parker Dam. Parker Dam generation is split 50/50 between Reclamation and MWD. Reclamation's share of energy is part of the Parker - Davis Project (P-DP) and is used for Project Use Power and preference power sold to firm electric contractors in Nevada, Arizona and a small percentage to California. MWD's share of Parker Dam energy is used to pump Colorado River water through the Colorado River Aqueduct.