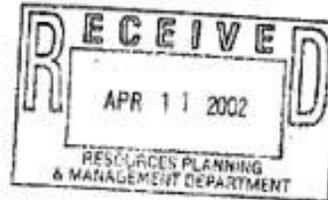


Anna Mae Jarvis-Turner  
P.O. Box 1208  
Rosamond, CA 93560  
April 8, 2002



Mr. Elston Grubaugh,  
Manage Resources Planning  
& Management Department  
Imperial Irrigation District  
P.O. Box 937  
Imperial, CA 92251

Greetings Mr. Grubaugh,

- C22-1** [ As a property owner in Salton Sea, I urge you not to approve any plan that harms the Salton Sea or the wildlife that depend on it for survival.
- C22-2** ■ **In short: Please protect "Salton Sea"**

Sincerely,

A handwritten signature in cursive script that reads "Anna Mae Turner".

Anna Mae Jarvis Turner  
P.O. Box 1208  
Rosamond, CA 93560

**Letter - C22. Signatory - Anna Mae Jarvis  
Turner.**

**Response to Comment C22-1**

In the absence of the Proposed Project, the salinity of the Salton Sea is projected to continue to increase with consequent reductions in the abundance of fish and changes in the invertebrate community at the Salton Sea. These changes would affect biological resources of the Salton Sea as described in Section 3.2 of the Draft EIR/EIS. Water conservation and transfer under the Proposed Project would accelerate the occurrence of these changes but would not result in different effects than would ultimately occur in the absence of the Proposed Project. Implementation of the Habitat Conservation Plan component of the Proposed Project would avoid or mitigate the effects to biological resources of the Salton Sea that are attributable to water conservation and transfer. See Master Response for *Biology-Approach to the Salton Sea Conservation Strategy* in Section 3 of this Final EIR/EIS.

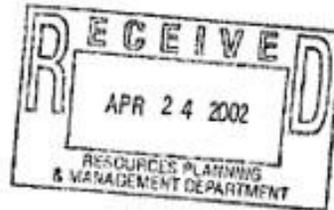
**Response to Comment C22-2**

Comment noted.

**Letter - C23. Signatory - John M. Gaffin.**

April 12, 2002

Mr. Elston Grubaugh, Manager  
Resources Planning and Management Department  
Imperial Irrigation District  
P.O. Box 937  
Imperial, CA 92251



Re: Water Conservation and Transfer Project Draft EIR/EIS  
and Draft Habitat Conservation Plan

Dear Mr. Grubaugh

C23-1

It appears that your district is considering a dangerous water transfer from the Salton Sea for the benefit of increased development in San Diego.

C23-2

The Salton Sea is one of the most important stops along the Pacific flyway for millions of migratory birds, and it provides habitat for numerous imperiled species, including the brown pelican. But the water transfer would destroy the sea and could even threaten public health by creating dust storms.

C23-3

C23-4

It is already well recognized that the Salton Sea is already experiencing significant environmental challenges. This proposal will only make the situation that much worse. Please say no.

Sincerely,

A handwritten signature in cursive script that reads "John M. Gaffin".

John M. Gaffin  
10985 Dyerville Loop  
Myers Flat, CA 95554

**Response to Comment C23-1**

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

**Response to Comment C23-2**

In the absence of the Proposed Project, the salinity of the Salton Sea is projected to continue to increase with consequent reductions in the abundance of fish and changes in the invertebrate community at the Salton Sea. These changes would affect biological resources of the Salton Sea as described in Section 3.2 of the Draft EIR/EIS. Water conservation and transfer under the Proposed Project would accelerate the occurrence of these changes but would not result in different effects than would ultimately occur in the absence of the Proposed Project. Implementation of the Habitat Conservation Plan component of the Proposed Project would avoid or mitigate the effects to biological resources of the Salton Sea that are attributable to water conservation and transfer. See Master Response for *Biology-Approach to the Salton Sea Conservation Strategy* in Section 3 of this Final EIR/EIS.

**Response to Comment C23-3**

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 C23-4**

Refer to the Master Responses on *Air Quality--Salton Sea Air Quality Monitoring and Mitigation Plan* and *Biology - Approach to Salton Sea Habitat Conservation Strategy* in Section 3 of this Final EIR/EIS.

April 11, 2002

Mr. Elston Grubaugh, Manager  
Resource Planning and Management Department  
Imperial Irrigation District  
P.O. Box 937  
Imperial, CA 92251



Re: IID EIR/EIS NEPA and CEQA Response

Dear Mr. Grubaugh:

This is my formal response to the EIR/EIS on the proposed transfer of water from the Imperial Irrigation District to the Metropolitan Water District and San Diego County Water Authority.

c28-1

1. **The EIR/EIS does not consider viable alternatives to transferring water.**

2. Greywater Irrigation.

As explained in an April 9, 2002 letter to you and your counterpart at the US Bureau of Reclamation timely sent via the US Mail from ReWater Systems, Inc., greywater irrigation in new residential settings would provide enough water to eliminate the need for this transfer, and it would not have the negative environmental impacts of the transfer. The studies and data cited in that letter are hereby cited by reference.

b. Drip Irrigation.

Drip irrigation has been available for more than 20 years, and it is highly evolved these days. All the countless studies on drip irrigation have shown that drip is 30%-60% more efficient than sprinklers, yet sprinklers are what almost all new landscapes use for irrigation. The Irrigation Industry Association reports that only 4% of irrigation products sold are drip related. It is no more than that in Southern California.

**Letter - C28. ReWater Systems, Inc.. Signatory - Stephen Wm. Bilson.**

**Response to Comment C28-1**

Comment noted. Please refer to the Draft EIR/EIS, Appendix D, Alternatives Analysis, Alternative 8, Maximize Local Supplies in SDCWA Service Areas and Develop 200 KAFY Desalination Facility. Alternative 8 considered the degree of conservation that was predicted to be feasible for SDCWA by the year 2020, as reported in SDCWA's 2000 Urban Water Management Plan. Many of the conservation methods suggested by the commenter are recommended by SDCWA through its conservation outreach programs, which are described below.

**Agricultural Water Management Program.** The Agricultural Water Management Program provides free irrigation system evaluations to agricultural properties with 2 or more acres of irrigated crops or groves. The evaluator observes plant material, soil, and irrigation systems. Emission uniformity and pressure readings are taken for the irrigation system, and recommendations, crop data, and technical information about the particular type of irrigation equipment in use are all provided.

**Professional Assistance for Land Management (PALM) Program.** The PALM Program audits, at no cost, the irrigation system and landscape at sites with 1 or more acres of irrigated landscape. Using methodology developed by the Irrigation Training and Research Center at California Polytechnic State University at San Luis Obispo, the PALM surveyor performs catch-can tests and numerous soil and plant observations and calculates an irrigation schedule.

**Residential Survey Program.** The Residential Survey Program surveys water conservation opportunities for target single-family homes as well as multi-family properties with fewer than 2 acres of irrigated landscape. SDCWA member agencies may also refer other residential customers who request water conservation assistance. The customer receives a review of indoor and outdoor water-saving opportunities and a packet of educational literature. Toilets are checked for leaks, and opportunities to retrofit with ultra-low-flush models are assessed. Customers are shown how to read their water meters. Landscape and irrigation systems are thoroughly examined, and a watering schedule is calculated.

**Response to Comment C28-1(continued)**

**Commercial Industrial Institutional Voucher Program.** This program provides point-of-purchase vouchers to customers replacing water-inefficient equipment in commercial, industrial, or institutional settings.

The degree of conservation expected to be achieved through these programs was incorporated into the Urban Water Management Plan.

Also, please refer to the Master Responses on *Other—Desalination on SDCWA Service Area and Comments Calling for Increased Conservation* in Section 3 of this Final EIR/EIS.

Drip irrigation has the added benefit of drastically reducing irrigation run-off. Irrigation run-off carries animal feces, fertilizers, and silt, and is a huge source of water pollution in Southern California; it may be the single largest source. Reducing the amount of pollutants in water is highly desirable and is mandated by numerous state and federal laws.

The San Diego County Water Authority has published data claiming a new single-family home uses .24 acre feet of water per year to irrigate their landscape. Some homes in Southern California use less than this and some inland homes use far more, so this number is a fair average of water use for new homes.

According to the Construction Industry Research Board, 50,000 new homes are proposed to be built per year in Southern California. Therefore, they will use 12,000 AF for landscape irrigation if allowed to be built using sprinklers. The 1,000,000 new homes in Southern California to be built over the next 20 years will use 240,000 AF by the 20<sup>th</sup> year if allowed to be built using sprinklers.

If those 1,000,000 new homes were to use drip irrigation, instead of using .24 AF, they would use from .168 AF to as little as .096 AF for landscape irrigation. This means those homes would use .072 AF - .144 AF less than if they used sprinklers. This extrapolates out to a savings of 72,000 AF - 144,000 AF by the 20<sup>th</sup> year.

Multi-family residences also use large quantities of water for landscape irrigation. The estimated number of such residences to be built, if they used drip irrigation, when combined with savings from single-family residences, could save from half to the full balance of the amount of water proposed to be transferred.

c. Less Turf.

Turf is by far the biggest consumer of water in any landscape. Virtually all current Southern California landscape plans, thus water use projections, are predicated on the existing standard of using up to 80%

of the evapo-transpiration (ET) needs of a landscape that used only turf.

This 80% maximum is a result of Assembly Bill #325, which was a result of this state's 1987-1994 drought. This mandate effects Northern California and Southern California equally. It results in a higher than "necessary" use of water in Southern California, as water in Southern California must be imported from elsewhere.

What is "necessary" for landscape irrigation is a consequence of what type of landscape is planted. If turf is planted, then more water is "necessary" for irrigation. If less turf is used, then less water is "necessary". Landscapes in Southern California are notorious for using vast areas of turf for landscaping. Turf is the choice of most home builders because it is cheap and easy to install and irrigate.

Ironically, it is considered an "upgrade" when homes have less turf and more shrubs and flower beds, which use 20%-50% less water than turf. If new Southern California homes upon construction were to automatically be "upgraded" to more shrubs and flower beds and less turf, Southern California's water demand would be dramatically reduced.

If the 1,000,000 homes to be built over the next 20 years had such upgrades, they would use 48,000 AF - 120,000 AF less water than if the current amount of turf is allowed, plus multi-family savings. Arizona homes use less than this amount of water for landscaping. Surely Southern California homes can use this little.

### 3. Modern Irrigation Controllers

Almost all of the irrigation controllers now used on residential landscapes provide regular irrigation scheduling, but they do not account for changes in the most important irrigation factors, such as precipitation, temperature, and humidity. Many studies have shown that few homeowners manually change the settings on their controllers to account for these factors, thus these controllers cause over-watering in the neighborhood of 25% - 35%.

Some companies have produced irrigation controllers which have seasonal changes built into their irrigation programs. By automatically increasing run times of irrigation valves during the spring and again even more in the summer, and vice versa in the fall and winter, these controllers remove the human factor.

There are also irrigation controllers available that communicate with the California Department of Water Resources' CIMIS weather stations. There are CIMIS stations located throughout Southern California. Each CIMIS station records and transmits local evapo-transpiration needs. Controllers that can access such information then adjust their irrigation programs according to the transmission, thus are quite responsive to local irrigation requirements.

One study out of Orange County found that such ET controllers can reduce water usage on a normal, existing single family landscape by about 17% or more, and that study relied on volunteers who already possessed a water conservation ethic. That would mean that the 1,000,000 new homes could reduce their water needs by 40,800 AF or more, plus multi-family savings.

#### 4. Rain Gauges

Irrigation is not required or wanted on a rainy day, as water applied during a rain will simply run off. Seeing sprinklers run during a rain also sends the wrong signal to people. Neither conventional controllers or ET controllers prohibit irrigation when it rains, unless they have a rain gauge attached. Rain gauges can be attached to virtually any controller to prohibit irrigation while raining. These "gauges" collect rain in a small container, causing water to short out the irrigation signal from an otherwise fully functioning controller.

These inexpensive gauges decrease the amount of excess water used for irrigation by the frequency of rain received by any location. In Southern California, where it might measurably rain 10-20 times a year, with the current state of no human intervention of irrigation occurring,

this can account for up to 5% of all water used for irrigation, or up to 12,000 AF per year, plus multi-family savings.

5. Creation of a Southern California Landscape Irrigation Ordinance

Currently, the only standard for landscape irrigation in Southern California is what is imposed on the Signatories of the California Urban Water Conservation Council's Memorandum of Understanding. That MOU requires signatories to implement the Best Management Practices (BMPs) that have been agreed upon, after years of debate and study, as useful to all signatories.

However, Northern California has vastly different irrigation requirements than Southern California. Most parts of Northern California do not even irrigate in the winter, when almost all of Southern California irrigates year-round. Therefore, there is nothing in the MOU that requires any measure for single-family landscapes, which receive about *half* of all water used in Southern California. A landscaping ordinance will reduce their dependence on importing water from far away places such as Imperial Valley.

C28-1

**2. The EIR/EIS does not consider the foreign policy and/or the foreign human rights impacts of transferring water.**

The EIR/EIS fails to consider that the US/Mexican Border Water treaty requires consultation with the Mexican government when planning to impact border water. The EIR/EIS does, however, note that the USG asked the Bureau of Reclamation not to disclose the full impacts of this transfer to the Mexicans, as such would complicate foreign policy. The Mexican government has formally protested the USG's lack of consultation in this matter.

The water to be transferred is designated as "surplus" for the purpose of transferring it, but it is the same water that is well documented to historically flow into aquifers located in Mexico, pumped up, and used by farmers in the Mexicali Valley. It is not surplus to them.

C28-2

**Response to Comment C28-2**

Refer to Section 3.16 of the Draft EIR/EIS, which evaluates the transboundary impacts of the Proposed Project. In addition, the effects of the federal actions required to implement the transfer of water from IID to SDCWA and/or MWD under the Proposed Project, assuming implementation of the QSA (the second scenario for implementation of the Proposed Project), including the change in the point of delivery, are assessed in the Draft IA EIS prepared by Reclamation, which is incorporated into this Draft EIR/EIS by reference. The Draft EIR/EIS relies upon the assessment developed in the Draft IA EIS and provides an assessment of the federal actions required to implement the transfers to SDCWA under the Proposed Project, assuming that the QSA is not implemented (the first scenario for implementation of the Proposed Project).

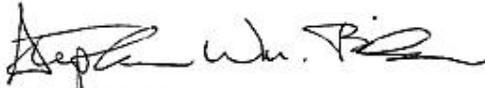
The commenter is incorrect in stating that Reclamation decided not to include the full impacts of the Project to Mexico in the EIR/EIS. The commenter is also incorrect in stating that the Draft EIR/EIS notes that the USGS asked Reclamation not to disclose the full impacts of the Project to Mexicans.

Those farmers have no other source of water. Studies show that, without the historical flows into their aquifers, their wells will soon become so saline that they will not be able to grow their crops. They rely on this water for their sole source of family income - farming.

Without this water continuing to enter their aquifers, these farmers, their families, and all the community they support around them, will very quickly find themselves facing permanent unemployment. With no social safety net as found in the US, with only farming skills, they will have to choose between starving, finding work in Mexico, or attempting to illegally immigrate to the US for work. The latter option is the most likely.

For all these reasons, the EIR/EIS is defective and the proposed transfer should be canceled.

Sincerely,



Stephen Wm. Bilson  
2085 Waterbury Circle  
Chula Vista, CA 91913

C28-2

Salton Sea Authority meeting Brawley California April 18<sup>th</sup> 2002

Tim Krantz, Ph.D. Professor of Environmental Studies, Salton Sea Data base program manager at the University of Redlands was authorized by Congress to summarize all the air quality control studies and put them on one data base to help those making the decision to transfer or not transfer water to San Diego from the Imperial Irrigation District. Dr. Krantz made a presentation at the Salton Sea Authority meeting held 4/18/02 that makes the decision a no brainer. Just say no!

I will try to cover some of the major factors that he presented that should be considered and mitigated before any water transfer can take place. The size of the Sea at one time was three times as large as the present Salton Sea. This body of water has risen and receded over a twelve million year period. It has been up to 300 feet deep and it has dried up. Each rise and fall of the water level deposits toxic materials on the exposed surface. When not covered by water these toxic materials are blown by the wind over thousands of miles. This toxic air quality is probably responsible for Imperial Counties having the highest hospitalization rate in the State for young people with air borne diseases. The present level of the sea is 227 feet below sea level. With the transfer of 300,000 acre feet of water and the attendant loss of an additional 200,000 acre foot caused by the water transfer the Sea the level would fall to 253 feet below sea level. With this 500,000 acre foot loss of water, an area of 85,000 to 105,000 square miles of land covered with toxic material is exposed to the areas high winds. I live in San Diego County and Santa Ana winds have been clocked over sixth to seventy miles per hour. As long as these toxic materials are covered by water there are no harmful effects.

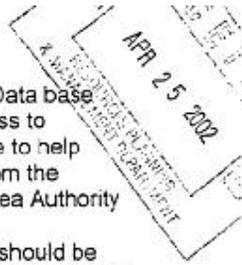
Since L.A. dried up the Owens Valley lake area they have developed the worst air quality in the state. Authorities have spent \$400 million to date trying mitigating this problem and plan to spend an additional 10 to 20 millions each year to wet the exposed lake bed to keep these toxic materials from becoming air borne. Owens Valley dust has been identified and Owens Valley's toxic particles have been detected as far east as the Grand Canyon and as far south as Riverside county. The exposed lake bed area won't re-grow vegetation. Their only hope is to keep the area wet to prevent the wind from blowing these toxins over California and adjacent states.

Authorities are having similar problems in Washington State and Oregon lakes that have accumulated lead and other toxic material which has settled to the bottom of their lakes and streams. As long as water covers these toxic deposits there is no problem, they use their lakes for tourist attractions, recreation, fishing and farming to grow the economies of these areas.

Another scientific study states that the proposal to divert 300,000 acre feet of water per year from the Salton Sea would cause the sea to shrink by up to 105 square miles, exposing nearly a third of the 300 square mile sea. As long as the current Salton Sea boundary of 360 square miles is maintained there is no air bore toxins. This study shows with the transfer taking place every year, the future size of the Sea would shrink to 255 square miles. By comparison the volume of toxic material now being generated at the dry Owens lake bed would be small when compared to the toxic material exposed by drying up the Salton Sea. This toxicity from the dry Salton Sea bed would increase exponentially because the Owens Valley had no history of drying up and flooding to install progressive layers of toxic material over thousands of years. Air borne Health problems would be drastically increased in Southern California and Arizona.

If San Diego wants more water for growth, they should be talking to Arizona and Nevada about buying some of the surplus water they are receiving from the Colorado River. They don't have current needs for this water and are storing part of their allotment in underground aquifers for future use. Jack Allen Jdallen74@aol.com

*Jack Allen*



## **Letter - C29. Signatory - Jack Allen.**

### **Response to Comment C29-1**

Comment noted.

### **Response to Comment C29-2**

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 C29-3**

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 C29-4**

In response to concerns expressed regarding growth in San Diego, please refer to the Master Response on *Other-Growth Inducement Analysis* in Section 3 in this Final EIR/EIS. In addition, the comment suggests that San Diego should talk with Arizona and Nevada about purchase of surplus water that those states receive from the Colorado River. Even if the water were available from Nevada and Arizona, it is highly questionable whether, under the Law of the River, SDCWA could contract with those states for an interstate transfer of Colorado River water. In any event, Nevada and Arizona are now taking at or near their full entitlements. The Secretary of the Interior has recently promulgated regulations that would allow Arizona to establish a water banking program under which water could be made available to water users in Nevada and California. However, under the regulations, participation would be limited to entities that currently have water delivery contracts with the Secretary, and the amount of water that could be delivered would also be limited. SDCWA is not a Colorado River contractor and could not participate. MWD is a Colorado River contractor and has discussed participation in a banking program with the Arizona authorities. If MWD entered into such a banking program, the water acquired would be utilized to help assure a full Colorado River Aqueduct. It must be remembered that the IID/SDCWA Water Transfer and other QSA actions will not by themselves ensure a full Colorado River Aqueduct. Other programs such as an Arizona/MWD water banking program will also be required.