

C35-75

Page D-2: Paragraph beginning/ending with "The potentially significant impacts following for conservation."

- The identified impacts ARE significant, NOT "potentially" significant. Statement expresses a biased position and does not belong in this document. It is also in conflict with statements later in the same paragraph
- Statement on the implementation of the HCP is FALSE. HCP only mitigate a limited number of the total significant environmental impacts. As stated in the document, the reader is led to believe that HCP is a cure all.

Response to Comment C35-75

The paragraph referred to by the commenter is an accurate depiction of the impacts and the potential effects of the HCP. The impacts resulting from changes in salinity, elevation, and surface area of the Salton Sea are indeed "potentially significant" because the implementation of HCP Approach 2 (now referred to as Salton Sea Habitat Conservation Strategy) would avoid those impacts and assure that flows to the Salton Sea are kept at levels consistent with those anticipated under the predicted Baseline condition. The paragraph does not state that HCP Approach 2 (now referred to as Salton Sea Habitat Conservation Strategy) would avoid all impacts of the Proposed Project, only those associated with changes in salinity, elevation, and surface area of the Salton Sea.

C35-76

Page D-2: paragraph beginning/ending with "On the Lower ... potential impacts."

- Diverting the water at Parker Dam, rather than Imperial Dam does not impact the flow of the water between Parker Dam and Imperial Dam. The water being taken in this transfer replaces water MWD is currently taking in excess of its entitlement. If this were not the case, the CRA would be overfilled, and the Project would require the construction of a new water conveyance between IID and SDCWA.

Response to Comment C35-76

The water transfers would indeed cause a reduction in normal flows between Parker and Imperial Dams. The reduction in flow is driven by reductions in water deliveries to IID, as a result of water conservation actions within the IID water service area. Because less water would be delivered to IID at Imperial Dam, less water would be released from Parker Dam.

C35-77

Page D-6: paragraph beginning/ending with "C6. Can California 4.4 Plan."

- 10 years to develop is an arbitrary criteria which cannot be supported with data. Consider SDCWA water use purchases from MWD shown in Table DD-1: MWD Water Deliveries to SDCWA (source: www.mwd.com) when compared to Annual Rainfall at Lake Henshaw, San Diego County as shown in Table DD-2 (source: www.sdcwa.org). If one compares SDCWA deliveries from MWD to drought periods 1987 to 1991 and 1999 to current, water use has not changed. In 15 years SDCWA water use has essentially been stable. Thus the 10 year criteria is purely arbitrary and cannot be supported by data. Based on the data from Tables DD-1 and DD-2, a period of 15 to 20 years would be appropriate. Anything less, introduces the issue of the water transfer being growth inducing in the SDCWA service area and serves to reduce efforts for conservation and water recycling.

Response to Comment C35-77

Within the context of the Project objectives for both IID and SDCWA, 10 years is an appropriate time frame within which it should be possible to implement a project. In fact, to meet the terms of the QSA and keep the Interim Surplus Guidelines from being suspended, a project would need to be implemented by the end of 2002. For projects that require a longer time frame to develop, there are no assurances in earlier years that they can be implemented; thus, they could not be relied upon to meet the terms of the QSA.

C35-78

Page D-15: Discussion of Proposed Project - 300 KAFY Water Conservation and Transfer paragraph beginning with "EXPLANATION: ..."

- It is stated that the Project is "cost effective." This is not proven and is solely a judgment of the Appendix's author. Given the magnitude of the environmental and social economic problems of the Project, without a full economic analysis, the "cost effective" statement cannot be made. Property owners will lose real estate value, medical problems will become endemic due to airborne dust, lawsuits will likely become rampant, etc. How does one judge these into cost effectiveness?
- Criteria C5 should be marked UNKNOWN, not PASS. Air quality and other issues brought out in the review process will make government approvals problematic.

Response to Comment C35-78

The reference to any alternative being "cost-effective" will be removed from the Alternatives Analysis in Appendix D (refer to the Appendix D, FEIR subsection in Section 4.2, Text Revisions of this Final EIR/EIS). Cost was not a criterion in the evaluation of alternatives. Additionally, criterion C5 for the Proposed Project will be modified to Unknown.

TABLE DD-1: MWD Water Deliveries to SDCWA

Year	Deliveries (KAFY)
1979	285.8
1980	305.0
1981	369.8
1982	415.6
1983	304.2
1984	367.2
1985	434.2
1986	486.6
1987	520.9
1988	525.7
1989	592.2
1990	672.8
1991	559.5
1992	444.6
1993	432.4
1994	403.7
1995	397.7
1996	446.1
1997	497.1
1998	441.1
1999	462.3
2000	600.9
2001	599.2

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Response to Comment C35-79

Please refer to the response given for Comment C35-78.

Response to Comment C35-80

Please refer to the responses given for Comments C35-77 and C35-78.

Page D-15: Discussion of Proposed Project - 300 KAFY Water Conservation and Transfer paragraph beginning with "EXPLANATION: ..."

C35-79

- It is stated that the Project is "cost effective." This is not proven and is solely a judgment of the Appendix's author. Given the magnitude of the environmental and social economic problems of the Project, without a full economic analysis, the "cost effective" statement cannot be made. Property owners will lose real estate value, medical problems will become endemic due to airborne dust, lawsuits will likely become rampant, etc. How does one judge these into cost effectiveness?
- Criteria C5 should be marked UNKNOWN, not PASS. Air quality and other issues brought out in the review process will make government approvals problematic.

Page D-17: Discussion of Alternative 2 - 130 KAFY Water Conservation and Transfer paragraph beginning with "EXPLANATION: ..."

C35-80

- See comment, page D-15 on "cost effective."
- See comment, page D-15 on criteria C5.



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TABLE DD-2

Annual Rainfall at Lake Henshaw, San Diego County

Calendar Year, 1963 - 2000

MWD water De
to SDCWA
(KAFY)

Year	Actual Rainfall (In)	Normal Rainfall (In)	% of Normal
1963	22.54	27.42	82.20
1964	22.97	27.42	83.77
1965	37.08	27.42	135.23
1966	23.32	27.42	85.05
1967	26.54	27.42	96.79
1968	11.79	27.42	43.00
1969	42.60	27.42	155.36
1970	23.38	27.42	85.27
1971	20.93	27.42	76.33
1972	14.62	27.42	53.32
1973	29.26	27.42	106.71
1974	13.72	27.42	50.04
1975	22.41	27.42	81.73
1976	24.65	27.42	89.90
1977	23.20	27.42	84.61
1978	55.08	27.42	200.88
1979	31.53	27.42	114.99
1980	54.41	27.42	198.43
1981	20.69	27.42	75.46
1982	46.96	27.42	171.26
1983	47.35	27.42	172.68
1984	21.77	27.42	79.39
1985	21.45	27.42	78.23
1986	23.33	27.42	85.08
1987	25.57	27.42	93.25
1988	21.32	27.42	77.75
1989	10.47	27.42	38.18
1990	17.67	27.42	64.44
1991	32.77	27.42	119.51
1992	31.62	27.42	115.32
1993	52.61	27.42	191.87
1994	20.65	27.44	75.26
1995	41.92	28.13	149.02

285.8
305.0
369.8
415.6
304.2
367.2
434.2
486.6
520.9
525.7
592.2
672.8
559.5
444.6
432.4
403.7
397.7

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1997	22.20	28.13	78.92	497.1
1998	44.56	28.17	158.18	441.1
1999	10.25	28.13	36.44	462.3
2000	17.95	28.42	63.16	600.9

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Page D-18: Discussion of Alternative 3 - 230 KAFY Water Conservation and Transfer paragraph beginning with "EXPLANATION: ..."

C35-81

- See comment, page D-15 on "cost effective."
- See comment, page D-15 on criteria C5.
- In the sentence "Because this alternative results in a significantly smaller reduction in drainage to the Salton Sea, it has the potential to substantially reduce the significant environmental impacts ..." The use of "significantly" and "substantially" are not appropriate and show the bias of the author and are intended to make the reader feel good about this alternative. From a scientific viewpoint, the definition of significant and substantial is judgmental. Reducing the Project from 300KAFY to 230KAFY has little impact on the environmental problems that occur as a result of the Project.

Page D-19: Discussion of Alternative 4 - 300 KAFY - Fallowing as Exclusive Conservation Method paragraph beginning with "For purposes of analyzing ..."

C35-82

- It should be mentioned that under normal practice, an average of 20,000 acres are fallowed yearly to rest the land, and this 50,000 acres is in addition to the 20,000 acres.
- To mitigate dust and soil erosion, a grass cover crop should be established and then allowed to die and left in-place until the land is restored to crop operations..

Page D-21: Discussion of Alternative 5 - Treatment/Reuse

C35-83

I question this alternate as presented. The concept of Treatment of the agricultural drainage is to reduce the salts before allowing it to enter the Salton Sea, thus reducing the salinity buildup. The Project will still take 300 KAFY away from the sea, thus the sea will still shrink in size. Treatment of the drain water to remove the salts will reduce the rate of Salton Sea salinity buildup and thus prolong the fishery over that of the Project. Brine generated from the treatment facilities can be deposited in evaporation ponds established in exposed seabed areas as the sea recedes. Two mitigating effects occur here; first the fishery is prolonged, and second, the evaporation ponds reduce the amount of exposed sea floor as the sea recedes, thus reducing the airborne particulate problem. This alternative needs to be re-written to reflect the foregoing.

In regards to feasibility, under P.L. 93-320, Colorado River Basin Salinity Control Act, Title I, June 24, 1974 and P.L. 96-336, Amend Colorado River Basin Salinity Control Act, September 4, 1980, the United States Government will be providing salinity control on the Colorado River water delivered to Mexico - see Attachment DD-1: Colorado River Basin Salinity Control Project - Title I. If the United States Government can do it for Mexico, why cannot IID do it for the environment?

CONCLUSION: After re-evaluation, the screening criteria for **Alternative 5** exhibit NO FAILS, thus the alternative should be fully evaluated.

Response to Comment C35-81

Please refer to responses given for Comments C35-77 and C35-78. The potential for Alternative 3 to reduce impacts is not insignificant. The goal of all project alternatives is to reduce impacts compared to the Proposed Project. Alternative 3 would result in either fewer acres fallowed, if fallowing were implemented or lesser impacts to the Salton Sea in terms of elevation and surface area and salinity. Alternative 3 would result in a surface elevation of -247 compared to -250 for the Proposed Project; and a surface area of 178,000 compared to 167,000 acres for the Proposed Project. While these differences may not be considered substantial or significant by the commenter, they do represent a reduction in impact compared to the Proposed Project. Nonetheless, Appendix D in the Draft EIR/EIS will be revised to omit the word "significantly" in reference to the reduction in drainage to the Salton Sea. Changes are indicated in subsection Appendix D under Section 4.2, Text Revisions, of this Final EIR/EIS.

Response to Comment C35-82

Appropriate dust and erosion control measures for fallowed lands are described in the Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 3 of this Final EIR/EIS.

The acres of land required to conserve water for transfer would be in addition to the average 20,000 acres of land currently fallowed on a rotational basis annually.

Response to Comment C35-83

Alternative 5, Treatment and Reuse, would not reduce environmental impacts when compared to the Proposed Project as suggested by the commenter. As described in Appendix D of the Draft EIR/EIS, it cannot be assumed that treatment byproducts can be easily disposed of. Disposal of brine on the shores of the Salton Sea as suggested by the commenter could have significant health effects depending on the concentration of potential pollutants in the brine. Additionally, the inherent difficulty with the Treatment and Reuse Alternative is that the technology is unproven at the scale that would be required to generate the amount of water required for transfer.

Response to CommentC35-83 (continued)

The feasibility of the US controlling salinity at the Mexican border and IID controlling salinity within the District are two completely different challenges. The US obligation relies on a program of salinity control projects authorized by Congress, which can be carried out throughout the basin (although salinity below Imperial Dam is a federal issue). For IID to control salinity is technically a different challenge. IID does not have the opportunity, for example, to eliminate highly saline sources of inflow to the CR.

Colorado River Basin Salinity Control Project - Title I

LOCATION: This project is located in southwestern Arizona in Yuma County and southeastern California in Imperial County.

DESCRIPTION/JUSTIFICATION: The project activities include maintaining the Yuma Desalting Plant; maintaining the U.S. Bypass Drain, the Mexico Bypass Drain; and ensuring desalting/replacement obligations are minimized and Mexican Treaty salinity requirements are maintained.

The project provides for the enhancement and protection of the quality of water available in the Colorado River for the United States and the Republic of Mexico and to comply with the requirements of Minute 242 approved August 30, 1973, under the 1944 Treaty with Mexico. In executing the plan to reduce the quantity and improve the quality of Wellton-Mohawk Division drainage so the majority of it can be credited toward treaty deliveries, several measures were implemented: (1) construction of the Yuma Desalting Plant; (2) construction of the bypass drain in the United States and Mexico; (3) implementation of the Wellton-Mohawk Irrigation Efficiency Improvement Program; (4) Wellton-Mohawk acreage reduction; (5) Painted Rock Reservoir land acquisition and operation schedule modification; (6) construction of the Main Outlet Drain Extension Siphon; and (7) fish and wildlife mitigation measures.

AUTHORIZATION: P.L. 93-320, Colorado River Basin Salinity Control Act, Title I, June 24, 1974, and P.L. 96-336, Amend Colorado River Basin Salinity Control Act, September 4, 1980.

COMPLETION DATA: As of September 30, 2000, the project was 92 percent complete. The Protective and Regulatory Pumping Unit and associated features were completed in FY 1979; 14 wells and associated features on the Protective and Regulatory Pumping Unit were completed in FY 1979; the Coachella Canal Unit Replacement was completed in FY 1984; an additional 7 wells and associated features were completed in FY 1984; and the remainder of the wells and associated features will be completed as required. The Desalting Complex Unit was completed in FY 1991 and test operation of the main facility was completed and production of desalting water began in FY 1992. In FY 1993, the Yuma Desalting Plant was placed in ready reserve status and will continue to operate at this level for the foreseeable future. Construction of the remaining features associated with the Yuma Desalting Complex Unit will be completed as necessary. A new completion date will be determined when the plant is placed in operation.

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Page D-23: Discussion of Alternative 6a - Connect Coachella Canal to the CRA

Connecting the Coachella Canal to the CRA is a viable alternative. Diverting the water transfer at Imperial Dam rather than Parker Dam, increases the flow between Parker and Imperial Dams by the amount of diversion, thus reducing the TDS of the water within that reach. More dilution water for the farming and municipal discharges to the CR within the reach causes the reduced TDS. This is a positive impact, since a reduced TDS means less salt buildup in the discharge to the Salton Sea, thus partially mitigating that impact. Whether there are any other positive impacts to the LCR as a result of the increased flow is unknown without analysis. The increased flow between Parker and Imperial Dams results directly from the take point being moved to Imperial Dam. Whatever is taken at Imperial directly comes from the take at Parker, otherwise the Coachella Canal to CRA pipeline would overflow the CRA.

The paragraph beginning with "EXPLANATION: ..." needs to be modified.

- The sentence "The diversion would avoid the impacts associated with the reduction of flows in the Lower Colorado River caused by the change in diversion point required under the Proposed Project" is incorrect. As explained previously, because MWD will be reducing its take at Parker Dam by the amount of the transfer, there is NO NET CHANGE in the flow in the Lower Colorado River. This alternative actually INCREASES the flow between Parker and Imperial Dams. Because of this increased flow there is a net positive impact to the Lower Colorado River. Whether this positive impact is greater than the negative impact in constructing the pipeline is unknown. Aside from that, there is also a positive impact, in that the TDS of the water delivered to IID will have a lower TDS, thus the drainage water to Salton Sea should have a lower TDS, a net POSITIVE impact. Criteria C3 should thus be rated a MAYBE, not FAIL.
- Criteria C6, short term should be rated a MAYBE, not FAIL. Short-term diversions at Parker can likely be maintained until the pipeline is completed.

CONCLUSION: After re-evaluation, the screening criteria for **Alternative 6a** exhibit NO FAILS, thus the alternative should be fully evaluated.

Response to Comment C35-84

This comment reflects a misunderstanding on the part of the commenter regarding the Proposed Project. The Proposed Project will result in a net reduction in flows between Parker and Imperial Dams. Water transferred to SDCWA (and potentially MWD) would be diverted at Parker Dam rather than at Imperial Dam resulting in a reduction of flows in the reach of the LCR between those two diversion points. This alternative would not result in an increase in that reach (as suggested by the commenter) because the water that would be transferred is currently being diverted at Imperial Dam for use in the IID water service area. It would preserve existing flows but would not increase them.

As described in Appendix D of the Draft EIR/EIS, impacts because of the reduction in flow are considered to be fully mitigated with implementation of biological conservation measures described in Section 3.2 of the Draft EIR/EIS. The construction corridor required for this alternative would be 150 to 200 feet wide and 7 to 10 miles wide and could result in a number of substantial and possibly unavoidable significant impacts to water resources, biological resources, geology, soils and mineral, agricultural resources, air quality, cultural resources, noise, aesthetics, and hazards and hazardous materials. Therefore, this alternative does not potentially reduce impacts compared to the Proposed Project and does not warrant full evaluation in the EIR/EIS.

Response to Comment C35-85

The rationale for excluding Alternative 6b, Extend the AAC to SDCWA System, from further analysis is consistent with that described above for Alternative 6a, Connect the Coachella Canal to the CRA. While it is true that presently LCR water quality would be improved by taking the diversion at Imperial Dam rather than Parker Dam, this Alternative would not improve water quality at the Salton Sea. As part of the Salinity Control Program, each of the seven Basin States adopted a salinity numeric criteria of 879 mg/L at Imperial Dam. As the Basin States use additional LCR water, salinity in the LCR is predicted to increase; however, this criteria will result in the implementation of various salinity control measures to assure the salinity levels will remain at or below 879 mg/L. The criteria was also approved by EPA.

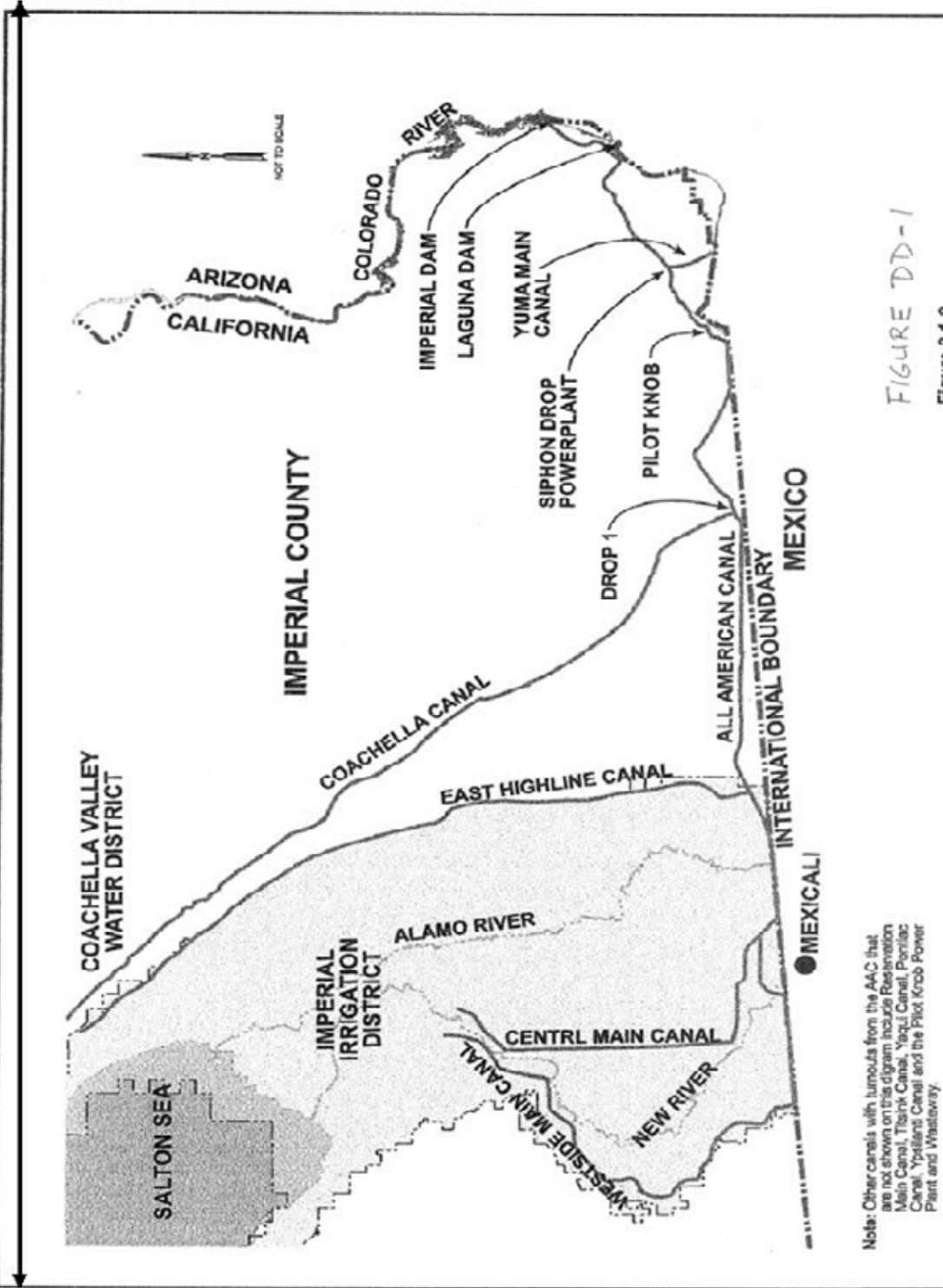
Page D-25: Discussion of Alternative 6b - Extend the AAC to SDCWA System

Connecting the AAC to the SDCWA system via pipeline between the western end of the AAC and the San Vicente Reservoir IS a via alternative. The sentence under the discussion section stating "This alternative may also require a canal parallel to the AAC, from the eastern portion of the extension, east to Imperial Dam because the AAC may not have sufficient capacity to carry transfer water" is questionable. Figure DD-1 (3.1-9) Project Site Features, shows the canal arrangement and Table DD-3 (Table 3.1-3): Annual Average Gross Diversion from Colorado River into AAC (1987-1998) - the water budget. IID/CVWD's take at Imperial Dam has historically been 3.43 MAFY (3.100 MAFY for IID and 0.330 MAFY for CVWD) and at Pilot Knob measured average is 3.292 MAFY after a conveyance loss of 140 KAFY. Under the proposed Project, Imperial Dam take by IID/CVWD is planned to be 3.066 MAFY (2.610 MAFY IID and 0.456 MAFY CVWD - see Table DD-4 (Table 2-1): Annual Colorado River Water Budgets with Implementation of QSA. Flow at Pilot Knob under full Project conditions, after allowing for a conveyance loss of 72 KAFY, is projected to be 2.994 MAFY. Note that conveyance loss has been reduced by 68 KAFY from the historical number to reflect the planned lining of a 23 mile section of the

Response to Comment C35-85(continued)

As described in Appendix D of the Draft EIR/EIS, impacts because of the reduction in flow are considered to be fully mitigated with implementation of biological conservation measures described in Section 3.2 of the Draft EIR/EIS. SDCWA has evaluated several optional alignments to connect the All American Canal facilities within the IID water service area and the SDCWA system at San Vicente Reservoir. The routes generally follow existing roadways and powerline rights-of-way and easements between these two points, primarily Interstate 8. It is anticipated that operation of the new pipeline would have a minimal effect on the diversion and desilting capacity at Imperial Dam. However, the All American Canal capacity below Drop 3 may have to be increased to accommodate year-round transportation of water. Additional storage reservoirs for daily operations may be required in the IID water service area. Storage may also be required at San Vicente Reservoir. The new pipeline would consist of two to three parallel, 5- to 6-foot diameter pipes, mostly above ground because of seismic and soils conditions. The construction corridor would be approximately 150 to 200 feet wide and would range in length from 90 to 150 miles (depending on the alignment selected). Total pumping requirements would be approximately 0.2 to 0.3 million horsepower.

Implementation of this alternative could result in a number of substantial and possibly unavoidable significant impacts to water resources, biological resources, geology, soils and mineral, agricultural resources, air quality, cultural resources, noise, aesthetics, and hazards and hazardous materials. (These impacts are described in greater detail in the Implementation of the Draft Colorado River Quantification Settlement Agreement Program EIR, January 2002, Chapter 5.) Therefore, this alternative does not potentially reduce impacts compared to the Proposed Project and does not warrant full evaluation in the EIR/EIS. Additionally, because this alternative would not reduce the requirements for mitigation at the Salton Sea and would involve extensive additional construction, it would be significantly more expensive than the Proposed Project.



Notes: Other canals with turnouts from the AAC that are not shown on this diagram include Resurrection Main Canal, Thrink Canal, Yagui Canal, Ferris Canal, Yulantis Canal and the Pilot Knob Power Plant and Wasteway.

FIGURE DD-1
EIMRICH 2 1 0