SECTION 1.0

Introduction

1.1 Overview of the Final EIR/EIS

The complete Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Imperial Irrigation District (IID) Water Conservation and Transfer Project and Habitat Conservation Plan (HCP) consists of the following:

- Imperial Irrigation District Water Conservation and Transfer Project and Draft Habitat Conservation Plan Draft EIR/EIS (Volume 1: Draft EIR/EIS and Volume 2: Appendices).
- Imperial Irrigation District Water Conservation and Transfer Project and Habitat Conservation Plan Final EIR/EIS (Volumes 1 and 2).

In addition, the following related environmental documents are incorporated into this EIR/EIS by references:

- Final Environmental Impact Statement Volume I and Appendix I of the *Implementation Agreement, Inadvertent Overrun and Payback Policy, and Related Federal Actions*, dated June 2002 by U.S. Department of the Interior Bureau of Reclamation.
- Final Program EIR for *Implementation of the Colorado River Quantification Settlement Agreement*, State Clearinghouse Number 200061034, June 2002. Prepared by Coachella Valley Water District, Imperial Irrigation District, The Metropolitan Water District of Southern California, and San Diego County Water Authority.
- Biological Opinion for Interim Surplus Criteria, Secretarial Implementation Agreements, and Conservation Measures on the Lower Colorado River, Lake Mead to the Southerly International Border of Arizona, California and Nevada. January 12, 2001.

The following subsections detail the environmental review process for this document, describe each section of the Final EIR/EIS that is contained in the two new volumes, and summarize the Project's evolution and environmental compliance.

1.2 Environmental Review Process

On January 17, 2002, IID filed a Notice of Completion with the Governor's Office of Planning and Research, State Clearinghouse, indicating that the Draft EIR/EIS had been completed and was available for review. On January 25, 2002, the Bureau of Reclamation (Reclamation) filed a Notice of Availability (NOA) with the Federal Register, also indicating that the Draft EIR/EIS was complete and available for review. IID and Reclamation made the Draft EIR/EIS available for public review and comment for 90 days, from January 18, 2002 to April 26, 2002. The Draft EIR/EIS was distributed to Responsible and Trustee Agencies pursuant to the California Environmental Quality Act (CEQA) and to Cooperating Agencies pursuant to the National Environmental Protection Act (NEPA) and was made available to members of the public at public libraries and on the Internet.

On April 2, 3, and 4, 2002, IID and Reclamation held public hearings in La Quinta, El Centro, and San Diego, California, respectively, to receive oral comments on the Draft EIR/EIS. Written comment letters were accepted by both Lead Agencies, IID and Reclamation, until the close of the review period on April 26, 2002. This Final EIR/EIS contains copies of all written and oral comments received on the Draft EIR/EIS and responses to those comments in Section 5.0 Responses to Comments Received on Draft EIR/EIS.

IID will review the EIR/EIS for adequacy and consider it for certification pursuant to the requirements of Section 15090 of the CEQA Guidelines. The IID Board of Directors (IID Board) will consider whether or not to approve the Proposed Project or an Alternative. Prior to such approval, the IID Board will: (1) adopt appropriate findings regarding the significant environmental effects identified in the Final EIR/EIS, the availability of feasible alternatives and mitigation measures to reduce or avoid significant environmental effects, and other matters pursuant to Public Resources Code Sections 21002, 21002.1, 21081, and 21081.5 and CEQA Guidelines Sections 15002, 15021, 15064 and 15091; (2), if necessary, adopt a statement of overriding considerations pursuant to Public Resources Sections 21002 and 21081 and CEQA Guidelines Section 15093; and (3) adopt a mitigation, monitoring, and reporting program pursuant to Public Resources Section 21081.6 and CEQA Guidelines Sections 15091 and 15097. After the IID Board certifies the adequacy of the EIR, approves the Project, and adopts the appropriate Findings and Statement of Overriding Considerations and required Mitigation Monitoring and Reporting Program, it will file a Notice of Determination (NOD) with the State Clearinghouse pursuance to CEQA Guidelines Section 15094. Certification of the EIR/EIS by the IID Board is scheduled to take place in June 2002. Project approval is not expected to be considered by the IID Board until the 4th quarter of 2002 after completion of the California State Water Resources Control Board (SWRCB) approval process for the water transfers (see Section 1.7.2.1 of the Draft EIR/EIS) and issuance of Incidental Take Permits pursuant to the state and federal Endangered Species Acts (ESAs) (see Sections 1.7.1.2 and 1.7.2.2 of the Draft EIR/EIS).

Reclamation will file the Final EIR/EIS with the United States Environmental Protection Agency (US EPA) following the IID Board certification. However, the Record of Decision (ROD) by Reclamation is not expected to be completed until after Project approval by the IID Board. Currently, the ROD is expected to be completed in December 2002, to meet the deadlines imposed by the Interim Surplus Guidelines

1.3 Report Organization of the Final EIR/EIS

1.3.1 Report Contents

This Final EIR/EIS is organized as follows:

- Section 1.0 Introduction
- Section 2.0 List of Commenters
- Section 3.0 Master Responses
- Section 4.0 Errata
- Section 5.0 Responses to Comments Received on Draft EIR/EIS
- Section 6.0 References

Sections 2.0 to 5.0 are described in detail below.

1.3.2 List of Commenters

Section 2.0 includes a complete list of federal, state, regional and local agencies, tribes, organizations, and individual citizens that submitted comments on the Draft EIR/EIS.

1.3.3 Master Responses

More than 200 letters, which presented more than 1,700 individual comments, were received on the Draft EIR/EIS. Although these comments reflect various concerns regarding the Project and EIR/EIS, many of the commenters expressed concerns on similar issues. In an effort to avoid redundancy in responses to individual comments and to provide a thorough response that addresses related issues, Master Responses were prepared for a number of issues that were raised by multiple commenters. The Master Responses are organized according to the following environmental resource categories:

- Hydrology
- Biology
- Recreation
- Air Quality
- Socioeconomics
- Other

Within each category, there are Master Responses on specific topics. The advantage of the Master Responses is that they are comprehensive: all the clarifying information provided on a particular subject area can be found in one place, and multiple cross-referencing between individual comments is not necessary. Each individual comment to which a Master Response applies is addressed with a cross reference to the appropriate Master Response.

1.3.4 Errata

Section 4.0 of the Final EIR/EIS contains errata and revisions to the Draft EIR/EIS and figure replacements to the Draft EIR/EIS. These are shown as redline/strikeout versions of pages from the Draft EIR/EIS along with the text that replaces the redline/strikeout sections. Most of the errata represent minor modifications to the text of the Draft EIR/EIS made in response to comments received or initiated by the preparers of the Draft EIR/EIS. In addition to the minor modifications, the Sections 3.9, Indian Trust Assets, and 3.15, Environmental Justice, have been revised and replaced in their entirety. Because these two NEPA sections rely on the impact determinations of each of the other resource areas, and because additional mitigation measures have been provided for some of those resource areas and additional information has been provided as well, it was determined that complete replacement of those sections would be more readable than showing the changes in redline/strikeout form in the Errata section. Also, Table ES-1, Summary of Significant Impacts and Mitigation Measures, and Table 3-2, Impacts in the Coachella Valley Water District (CVWD) and Metropolitan Water District of Southern California (MWD) Service Areas, have been revised and included in the Errata section of this Final EIR/EIS; these tables replace the corresponding versions in the Draft EIR/EIS in their entirety.

1.3.5 Comments and Individual Responses

Section 5.0 contains a complete copy of all comments received on the Draft EIR/EIS and responses to those comments. The section is presented in landscape format with each comment letter on the left and the corresponding response on the right.

Each comment letter is assigned a code (based on the category to which a commenter belongs—agency, tribe, organization, or citizen), and each separate, specific comment made within a letter is given a unique identifying number. The letter codes and comment numbers are shown on the left side of each letter. Responses to each comment are shown on the right and labeled with the corresponding letter code and comment number.

As described above, many of the comments are addressed by the Master Responses. When appropriate, these comments are referred to in the applicable Master Response.

1.4 Evolution of the IID Water Conservation and Transfer Project

1.4.1 Project Description

No significant changes have been made to the water conservation and transfer component of the Proposed Project since the issuance of the Draft EIR/EIS. The Proposed Project involves implementation by IID of a long-term water conservation program within the IID water service area in Imperial County, California to conserve up to 300 thousand acre-feet per year (KAFY) of Colorado River water for transfer to the San Diego County Water Authority (SDCWA), CVWD, and/or MWD, which IID would otherwise divert for use within its water service area.

Under the Proposed Project, water conservation would be accomplished in the IID water service area using one or more of the following measures:

- On-farm irrigation system improvements, including on-farm irrigation management techniques, which would be implemented by landowners and tenants within IID's water service area.
- Improvements by IID to its water delivery system.
- Subject to certain contractual limitations set forth in the IID/SDCWA Transfer Agreement, fallowing measures to conserve water.

The Proposed Project could be implemented under either of the two following scenarios:

- 130 to 300 KAFY to SDCWA (All Conservation Measures)(IID/SDCWA Transfer Agreement Implementation Only).
- Up to 200 KAFY to SDCWA and up to 100 KAFY to CVWD and/or MWD (All Conservation Measures) [Quantification Settlement Agreement (QSA) Implementation].

The Proposed Project also includes an HCP to avoid, minimize, and mitigate the impacts of any take of certain covered species, and to support issuance of Incidental Take Permits

under the state and federal ESAs in connection with the Proposed Project and IID's routine, water-related operations and maintenance (O&M) activities.

Additional details of the Proposed Project are included in Section 2.0 of the Draft EIR/EIS.

1.4.2 Selection of an HCP Approach for the Salton Sea

The Draft HCP included two approaches to address the effects of the covered activities on the Salton Sea. These approaches focused on mitigating the increased rate of salinization and the decline in Sea elevation associated with the Proposed Project, which is projected to affect the fish source on which piscivorous birds forage.

HCP Approach 1: Hatchery and Habitat Replacement – Under this approach proposed by the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG), IID would implement a phased approach for maintaining fish to provide foraging opportunities for piscivorous birds at the Salton Sea. In the first phase, IID would construct a hatchery to ensure continued availability of tilapia as a forage base for piscivorous birds. It is expected that as salinity in the Salton Sea increases, tilapia reproduction would be affected before adult survival is threatened. IID would stock tilapia in the Salton Sea when CDFG determines that natural reproduction of tilapia has ceased in the Salton Sea based on annual young of year abundance surveys conducted by CDFG. IID would continue stocking tilapia in the Salton Sea for as long as they could continue to survive and grow or until the Salton Sea Restoration Project was funded and its implementation initiated, whichever occurred first. If the Salton Sea Restoration Project was initiated, that project could fund continued operation of the stocking program until the salinity level of the Salton Sea was low enough to allow fish to reproduce naturally.

The second component of the approach would be initiated if a long-term Salton Sea Restoration Project was not implemented before the Sea could no longer support fish. Under this component of the approach, IID would create 5,000 acres of ponds at the Salton Sea that would support fish and provide a forage base for piscivorous birds. The purpose of these ponds would be to maintain some foraging opportunities at the Salton Sea for piscivorous birds for the remainder of the Project term.

This approach was investigated for more than a year by IID in consultation with representatives of USFWS and CDFG. Because considerable uncertainty remained about the ultimate success of this approach, it was concluded that the necessary Incidental Take Permits could not be issued for the approach as defined. As a result, and because of the large number of comments received from agencies and members of the public expressing concern regarding biological impacts to the Salton Sea, the Proposed Project has been changed to eliminate HCP Approach 1 from further consideration as mitigation for potential impacts to biological resources at the Salton Sea.

HCP Approach 2: Use of Conserved Water for Mitigation – Approach 2 would avoid Project effects on salinity and mitigate Project impacts on piscivorous birds by providing water inflow to the Salton Sea to offset inflow reductions caused by the Proposed Project. This mitigation strategy would maintain salinity and elevation changes at or above the projected Baseline trajectory, thereby avoiding salinity increases and elevation decreases resulting from the Proposed Project. Under this approach, water for mitigation purposes could be provided from fallowing, from any available water source, or a combination of sources.

Because HCP Approach 1 was eliminated from further consideration, HCP Approach 2: Use of Conserved Water for Mitigation, which is referred to in this Final EIR/EIS as the Salton Sea Habitat Conservation Strategy, is the sole proposed approach for mitigating biological impacts associated with reduced inflows to the Salton Sea resulting from the Proposed Project. Additional details about the implementation of the Salton Sea Habitat Conservation Strategy are included in Master Response in Section 3.5 for *Biology—Approach to Salton Sea Habitat Conservation Strategy*.

The major components of the HCP for the IID Water Service Area Portion remain the same as those evaluated in the Draft EIR/EIS. The Final HCP is included as Attachment A of this Final EIR/EIS.

1.4.3 Effects of Salton Sea Habitat Conservation Strategy (HCP Approach 2)

Implementation of the Salton Sea Habitat Conservation Strategy will minimize or avoid many of the impacts on other environmental resources that could have occurred had HCP Approach 1 been selected to mitigate impacts to biological resources at the Salton Sea. Table 1-1 summarizes the projected elevation, salinity [year at which 60 parts per trillion (ppt) is reached], and exposed areas under the Baseline as well as the Proposed Project with and without the Salton Sea Habitat Conservation Strategy. Table 1-2 summarizes the effect of implementing the Salton Sea Habitat Conservation Strategy on other environmental resources in the Salton Sea subregion. Additional details are provided in the Master Responses. Figure 1-1 shows the elevation of the Salton Sea under the projected Baseline and for the Proposed Project, with and without the Salton Sea Habitat Conservation Strategy.

TABLE 1-1
Proposed Project Elevation, Salinity, and Exposed Area

	Without Implementation of the Salton Sea Habitat Conservation Strategy			**With Implementation of the Salton Sea Habitat Conservation Strategy**		
	Elevation (2077)	Year 60 ppt is reached	Exposed Area (in excess of exposure under Baseline)	Elevation (2077)	Year 60 ppt is reached	Exposed Area (in excess of exposure under Baseline)
Projected Baseline	**-235 msl**	**2023**	**0**		**N/A**	
300 KAFY to San Diego (Assumes on-farm and water delivery system conservation measures)	-250 msl	2012	66,000 acres		N/A[1]	
300 KAFY to San Diego (Assumes fallowing)	-241 msl	2017	32,000 acres	-240	2030	16,000 acres

[1] Implementation of the Salton Sea Habitat Conservation Strategy in concert with on-farm and system-based conservation measures is not currently considered to be practicable. These so-called efficiency conservation measures require a 1-to-1 ratio of mitigation water to the Sea. That is, for every acre-foot (AF) of water conserved for transfer, an AF would need to be provided to the Sea in order to meet the obligations of the Salton Sea Habitat Conservation Strategy. This mitigation water would be provided by additional fallowing or water from other sources. The combination of conservation required to produce 300 KAFY for transfer plus conservation by fallowing to produce the related amount of mitigation water to meet the obligations of the Salton Sea Habitat Conservation Strategy has not been assessed in this Draft EIR/EIS. It is noted, however, that the source of mitigation water to implement the Salton Sea Habitat Conservation Strategy is not limited to fallowing or other Colorado River water provided by IID. If IID elects to pursue implementation of efficiency conservation together with the Salton Sea Habitat Conservation Strategy, additional environmental analysis may be required, depending on the quantity and source of mitigation water. However, some combination of efficiency conservation measures and fallowing could be implemented with the Salton Sea Habitat Conservation Strategy although the amount of each that would be required to satisfy the Salton Sea Habitat Conservation Strategy has not been determined.

Insert Figure 1.1 Bathymetric Elevations at the Salton Sea for the Proposed Project

TABLE 1-2
Comparison of Effects of HCP 1 and HCP 2 (Salton Sea Habitat Conservation Strategy) on Proposed Project Impacts (Salton Sea resources only)

Resource Area	With HCP Approach 1	With Salton Sea Habitat Conservation Strategy (HCP Approach 2)
3.1 Hydrology and Water Quality	No significant impacts to water quality; however increased salinity in the Salton Sea results in Biological and Recreation impacts.	Salinity levels are maintained at or below Baseline levels until at least 2030, avoiding associated Biological and Recreation impacts.
3.2 Biological Resources	Significant Impacts found in the Draft EIR/EIS to be mitigable with HCP implementation; however, HCP 1 has been determined to be infeasible and has been eliminated as an HCP approach.	Impacts to Biological Resources avoided and maintained at Baseline levels.
3.3 Geology and Soils	No significant impacts.	No significant impacts.
3.4 Land Use	No significant impacts.	No significant impacts.
3.5 Agricultural Resources	Significant and unavoidable impacts to farmland if non-rotational fallowing is used.	Significant and unavoidable impacts to farmland if non-rotational fallowing is used.
3.6 Recreation	Significant unavoidable impacts to sport fishing.	Impacts to sport fishing are avoided and maintained at Baseline levels.
3.7 Air Quality	Significant and unavoidable impacts from dust emissions from exposed shoreline.	Significant and unavoidable impacts from dust emissions from exposed shoreline avoided until 2030. Air quality impacts after 2030 remain potentially significant and unavoidable, as described in Master Response 3.9.
3.8 Cultural Resources	No significant impacts with mitigation.	Significant Impacts avoided until 2030.
3.9 Indian Trust Assets	Impacts associated with Air Quality.	Impacts avoided until 2030.
3.10 Noise	No impacts.	No impacts.
3.11 Aesthetics	No significant impacts with mitigation.	Significant impacts avoided until 2030 and minimized after 2030.
3.12 Public Services and Utilities	No significant impacts.	No significant impacts.
3.13 Transportation	No significant impacts.	No significant impacts.
3.14 Socioeconomics	Socioeconomic effects from Recreation impacts.	Recreation losses associated with loss of sport fishery avoided. Socioeconomic effects if non-rotational fallowing is implemented.
3.15 Environmental Justice	Impacts associated with Air Quality, and Recreation Impacts.	Impacts avoided until 2030 and minimized after 2030.

A revised version of Table ES-1, Summary of Significant Impacts and Mitigation Measures, is included in Section 4.0 Errata.

1.5 Environmentally Superior Alternative

Chapter 4, Alternatives Comparison, includes a detailed analysis and comparison of the Proposed Project with each of the alternatives. As required by CEQA this Chapter also identifies the environmentally superior alternative. CEQA Guidelines (Section 15126.6(e)2), Consideration and Discussion of Alternatives to the Proposed Project, state, "If the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." For this Project, Alternative 2, the No Project Alternative, is environmentally superior to the others; therefore, the following discussion regarding the next environmental superior alternative is provided.

For the Proposed Project and each of the Project Alternatives, the Salton Sea Habitat Conservation Strategy would effectively avoid the significant recreation impact to the Salton Sea sportfishery and would delay the potentially significant unavoidable air quality impact of dust emissions from the exposed Salton Sea shoreline until 2030 by providing mitigation water to the Sea at a level equal to or greater than the Baseline. After 2030, the magnitude of impacts is driven by the extent to which the Sea would decline by the end of the Project term (2077), as a result of the Project. Elevation decline is driven first by the method of conservation and secondly by the amount of conservation. Alternatives that utilize fallowing have the least impact on elevation. Alternative 2 (130 KAFY – On-farm irrigation improvements only), is the only alternative which does not include the use of fallowing to generate the conserved water for transfer. The 2077 elevation for Alternative 2 with implementation of the Salton Sea Habitat Conservation Strategy is anticipated to be about -242 msl. The Proposed Project, if implemented using fallowing to conserve the transferred water, would have a projected Sea elevation of –240 msl in 2077 as would Alternative 4. Alternative 3 (230 KAFY – All Conservation Measures), if implemented using fallowing to conserve the transferred water, would have an projected Salton Sea elevation in 2077 of between –235 and –240 msl.

Implementation of the Salton Sea Habitat Conservation Strategy would not avoid significant, unavoidable impacts on water quality (selenium impacts to the drains and the New and Alamo Rivers) or to agricultural resources (conversion of prime farmland and farmland of statewide importance or conversion of other agricultural lands to non-agricultural use). None of the alternatives are able to avoid water quality impacts, however, Alternative 2 would reduce them compared to the other Alternatives. To minimize impacts on agricultural resources, the method of conservation is the determining factor. Use of fallowing has the greatest impact on agricultural resources, therefore, alternatives with the greatest amount of fallowing have the greatest impact on agricultural resources. With implementation of the Salton Sea Habitat Conservation Strategy the Proposed Project and Alternatives 3 and 4 would include fallowing.

Therefore, the environmentally superior alternative would be one that minimizes impacts to the elevation of the Sea while also minimizing the amount of water conserved to reduce impacts to drains and minimizing the amount of conservation by non-rotational fallowing to reduce impacts to agricultural resources. Alternative 2, because it can only be implemented with on-farm irrigation system improvements would result in greater impacts to the elevation of the Salton Sea by 2077.

Alternative 3, (230 KAFY—All Conservation Measures), if implemented using fallowing, would result in the least amount of elevation reduction to the Salton Sea and would reduce water quality impacts to the IID drains and the Alamo River and impacts to agricultural resources compared to the Proposed Project and Alternative 4 (300 KAFY), and is therefore the environmentally superior alternative. Although socioeconomic impacts are not a consideration in the determination of the environmentally superior alternative under CEQA, it should be noted that Alternatives that rely on fallowing for conservation would result in greater socioeconomic effects than Alternatives that do not.

1.6 CEQA/NEPA Compliance

This Final EIR/EIS includes additional information that is intended to clarify and expand the information in the Draft EIR/EIS. After a careful review of the comments received on the Draft EIR/EIS, the responses to comments, and the information added to the Final EIR/EIS, the Lead Agencies have determined that recirculation of the document for additional public review and comment is not required. Although the new documentation issued as part of this Final EIR/EIS is extensive, it constitutes a good-faith effort to provide a detailed and thorough response to public comments and to improve the overall environmental analysis.

Section 15088.5 of the CEQA Guidelines governs recirculation of a Draft EIR prior to certification. Recirculation is only required when "significant new information" is included in the Final EIR, such as information showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningfully public review and comment were precluded.

NEPA Regulations Section 1502.9(c) similarly require the preparation and circulation of a supplement to a Draft EIS if:

(1) Substantial changes to the proposed project are made.

(2) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed project or its impacts.

None of the criteria described above as grounds for recirculation have been met, based upon the following:

The Final EIR/EIS does not identify new significant environmental impacts resulting from the Proposed Project or the Alternatives or from a new mitigation measure proposed to be implemented. The Final EIR/EIS does not identify a substantial increase in the severity of an environmental impact over that described in the Draft EIR/EIS unless mitigation measures are adopted that reduce the impact to a level of insignificance.

- Claims made by commenters to the effect that significant Project-related impacts were overlooked or will be more severe than disclosed in the Draft EIR/EIS are addressed in the Master Responses in Section 3.0 and the responses to specific comments included as Section 5.0 of this Final EIR/EIS.

- Although questions were raised concerning the use of a projected Baseline for the Salton Sea and the assumptions used to develop the Baseline, and although claims were made that use of this Baseline resulted in an underestimation of Project impacts, we have re-examined those issues and performed a sensitivity analysis to determine whether changes in key assumptions would significantly alter the impact analysis set forth in the Draft EIR/EIS. The Baseline purpose, rationale, assumptions, and methodology as well as the sensitivity analysis are described in detail in the Master Response in Section 3.3, *Hydrology—Development of the Baseline*. We have concluded that the use of a projected Baseline and the assumptions that were challenged is reasonable and appropriate, and the sensitivity analysis has confirmed that use of the Baseline has not resulted in an underestimation of Project impacts. This information validates the assessment set forth in the Draft EIR/EIS and provides additional detail to support the assessment.

- At the request of commenters, we have added information regarding the effect of implementation of the Project on total maximum daily loads (TMDLs). This information expands the discussion in the Draft EIR/EIS and does not identify any new significant impacts.

- As discussed above and in the Master Response in Section 3.5, *Biology—Approach to the Salton Sea Habitat Conservation Strategy*, the Proposed Project has been modified to delete HCP Approach 1 as a conservation strategy for the Salton Sea. This change eliminates the need to address issues raised by commenters regarding the implementation details, potential significant impacts, and effectiveness of this Approach. Although additional details have been provided the Master Response, this Approach has not been substantially modified, and no new significant impacts have been identified.

- We have provided additional details to support the determination that the impact on fish resources at the Salton Sea is not a significant impact to Biological resources in the Master Response in Section 3.6, *Biology—Impact Determination for Fish in the Salton Sea*, but the impact determination has not been changed. We have confirmed that implementation of the Salton Sea Habitat Conservation Strategy (HCP Approach 2) will avoid two significant impacts which were identified in the Draft EIR/EIS as impacts of the Project with implementation of HCP Approach 1: the significant Biological impact on piscivorous birds who rely on fish as a food source and the significant Recreation impact associated with loss of the sport fishery (see the Master Response in Section 3.8,

Recreation—Mitigation for Salton Sea Sport Fishery). These determinations are consistent with the Draft EIR/EIS.

- We have expanded the discussion of Socioeconomic impacts in the Draft EIR/EIS with two Master Responses that respond to issues raised by commenters. The Master Response in Section 3.17, *Socioeconomics—Property Values and Fiscal Impact Estimates*, describes impacts on property values as well as fiscal impacts to Imperial County. This discussion supplements the information in the Draft EIR/EIS. As noted in Section 3.14.3.1 of the Draft EIR/EIS, CEQA does not require assessment or mitigation of Project impacts that are purely economic or social unless there are related physical effects. Nevertheless, IID has chosen to describe these impacts in the EIR/EIS because of the widespread public concern over socioeconomic impacts of the Project. This information is also intended to assist the IID Board in evaluating the overall benefits and disadvantages of the Proposed Project and in determining how proceeds from the Project should be applied. The Master Response in Section 3.18, *Socioeconomics—Crop Type Assumptions for Socioeconomic Analysis of Fallowing*, provides additional information on the assumptions regarding cropping patterns used in the Draft EIR/EIS to describe the socioeconomic impacts of a fallowing program in Imperial County. This analysis responds to claims that the Draft EIR/EIS overstated the socioeconomic impacts of fallowing, and it explains that other cropping assumptions could result in reduced impacts. No change in the substantive assessment in the Draft EIR/EIS has been made, however, based upon IID's interest in disclosing the worst-case scenario so that interested parties and the IID Board will be appropriately informed.

- Additional information has been included in the Master Response in Section 3.20, *Other—Growth Inducement Analysis* to support the conclusion in the Draft EIR/EIS that the Proposed Project is not growth-inducing. The Final QSA Programmatic Environmental Impact Report (PEIR) also addresses comments challenging the conclusion in the Draft QSA PEIR that the QSA would not induce growth in the service areas of SDCWA, CVWD, and/or MWD, the water agencies who would receive conserved water from transfers provided for under the QSA. The information included in the Final QSA PEIR has been reviewed and is incorporated into this Final EIR/EIS. In addition, because this EIR/EIS addresses the water transfers to SDCWA under two scenarios (under the IID/SDCWA Transfer Agreement or, if the QSA is implemented, under the QSA) and is intended to provide project-level compliance for the transfers to SDCWA, the supplemental information in Section 3.20, *Other—Growth Inducement Analysis* regarding the SDCWA service area and growth issues has been provided. This information is consistent with and supports the conclusions of the Draft EIR/EIS.

- At the request of commenters, we have provided information on salinity concentration, elevation, and surface area associated impacts to the Salton Sea for the QSA Implementation Scenario. The predicted salinity concentration, elevation, and surface area for the Salton Sea presented in the Draft EIR/EIS are based on the IID/SDCWA Transfer Agreement Implementation Only scenario, which is a "worst-case" scenario for the Salton Sea, to ensure that impacts to the Sea were not underestimated. The analysis for the QSA Implementation Scenario is presented in the Master Response in Section 3.2, *Hydrology—Water Transfers to CVWD (QSA Implementation Scenario)*. No change in the substantive assessment in the Draft EIR/EIS has been made, however, based upon IID's

interest in disclosing the worst- case scenario so that interested parties and the IID Board will be appropriately informed.

The Final EIR/EIS does not identify a feasible Project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the Project and that the Project proponent refuses to adopt.

- At the request of commenters, we have re-examined the availability and feasibility of measures to mitigate selenium impacts in IID drains and the Alamo River, as set forth in the Master Response in Section 3.1, *Hydrology—Selenium Mitigation*. These selenium effects are identified in the Draft EIR/EIS as significant and unmitigable. Based upon the analysis in the Selenium Mitigation Master Response, the Final EIR/EIS confirms the conclusion in the Draft EIR/EIS that there are no available, feasible mitigation measures for this impact.

- Because of the level of concern about potential Air Quality impacts, as reflected in the comments received on the Draft EIR/EIS, we have included additional information to support the Air Quality assessment included in the Draft EIR/EIS. The Master Response in Section 3.9, *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* provides additional information regarding the impacts of dust emissions from exposed Salton Sea shoreline, which were identified in the Draft EIR/EIS as significant and unmitigable. It describes the potential differences between the Salton Sea shoreline exposure scenario and conditions at Owens Lake. We have also included a 4-step plan for monitoring, identifying and mitigating Air Quality impacts associated with emissive dust from exposed shoreline. This plan will also be used to monitor, identify, and mitigate health-based effects of dust emissions, as further described in the Master Response in Section 3.13, *Air Quality—Health Effects Associated with Dust Emissions*. As a result of implementation of the Salton Sea Habitat Conservation Strategy (HCP Approach 2), Air Quality impacts from exposed shoreline caused by the Project will not occur prior to at least 2030. Implementation of this Approach will avoid the significant Air Quality impacts anticipated in the Draft EIR/EIS with implementation of HCP Approach 1. The effect of HCP Approach 2 as a mitigation measure for Air Quality impacts was identified in the Draft EIR/EIS. The 4-step plan described in Section 3.9, *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan,* provides a methodology for identifying and implementing mitigation measures that should substantially reduce Air Quality impacts from emissive shoreline after 2030. However, the Final EIR/EIS retains the finding from the Draft EIR/EIS that these impacts are significant and unmitigable, for the reasons described in Section 3.9, *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan*.

- We have provided additional details regarding the anticipated Air Quality impacts of fallowing farmland in the Imperial Valley in the Master Response in Section 3.10, *Air Quality—Air Quality Issues Associated with Fallowing*. This Master Response also identifies standard best management practices (BMPs) that will reduce these impacts to a less than significant level. This discussion is consistent with and supports the conclusions of the Draft EIR/EIS.

- Additional Air Quality impact analysis is included in the Master Responses in Section 3.11, *Air Quality—Emissions from Construction of Conservation Measures,* regarding

emissions from construction of conservation measures, in Section 3.12, *Air Quality—Aggregate Emissions from the Salton Sea, Fallowing, and Construction,* regarding aggregate emissions from fallowing and conservation measures, and in Section 3.14, *Air Quality—Applicability of General Conformity Requirements to the Proposed Project or Alternatives,* regarding the applicability of general conformity requirements to the Project. This information is consistent with and supports the conclusions of the Draft EIR/EIS.

- Additional information regarding implementation of desalination and conservation projects in the SDCWA service area has been provided in the Master Response in Section 3.21, *Other—Desalination in the SDCWA Service Area and Comments Calling for Increased Conservation*. This information identifies conservation measures that have been and will continue to be implemented, but confirms that desalination and conservation projects do not provide a feasible alternative to the Proposed Project.