

## 5.4 Comments and Responses for Local Agencies

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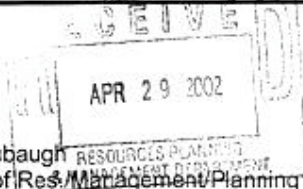


PLANNING/BUILDING DEPARTMENT  
IMPERIAL COUNTY

PLANNING / BUILDING INSPECTION / PLANNING COMMISSION / A.L.U.C.

JURG HEUBERGER, AICP CEP  
PLANNING/BUILDING DIRECTOR

CERTIFIED MAIL



April 25, 2002

Bruce D. Ellis  
Bureau of Reclamation  
Phoenix Area Office (PXAO-1500)  
P. O. Box 81169  
Phoenix, AZ 85069-1169

Elston Grubaugh  
Manager of Resource Planning  
Imperial Irrigation District  
P. O. Box 937  
Imperial, CA 92251

7000 1670 0011 5374 3843

7000 1670 0011 5374 3850

Subject: Response to the "Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS)" for Imperial Irrigation District Water Conservation and Transfer Project and Draft Habitat Conservation Plan

Dear Sirs:

The Planning/Building Department received the Draft EIR/EIS on Thursday, January 24, 2002, for review and comment. The "Abstract" indicates that there is a public review period and a deadline for response of **April 26, 2002**. The County previously submitted comments on the Imperial Irrigation District (IID) and Department of Interior/Bureau of Reclamation (BOR) Notice of Preparation (NOP) and Notice of Intent (NOI) in October 1999.

**INTRODUCTION**

(1) The County of Imperial provides these comments on the proposed IID/SDCWA (San Diego County Water Authority) water transfer and the Draft EIR/EIS to assist both IID and BOR in meeting their obligation to protect the economy and the environment of Imperial Valley. We appreciate the tremendous pressure that is being exerted upon the IID, BOR and the Imperial County residents to transfer water from Imperial Valley to other urban and municipal users in the Colorado River Basin. However, IID and Bureau of Reclamation must improve their assessment of the following water transfer-induced impacts including but not limited to:

- a. the loss of available water supply in Imperial County to meet the County's own reasonable future needs;

**Letter - L1. Imperial County California Planning, Building Department. Signatory - Jurg Heuberger.**

**Response to Comment L1-1**

The second implementation scenario for the Proposed Project (QSA Implementation) includes the more restrictive limit on IID's future diversions of Colorado River water on IID's Priority 3 diversions. Under the maximum transfers provided for under the QSA, IID would retain the ability to divert in excess of 2.6 MAFY of Colorado River water for agricultural, industrial, and domestic use within the IID water service area. In addition, at the end of the initial 45-year term, the IID/SDCWA Transfer Agreement potentially allows IID to reclaim up to 34 KAFY of transfer water for M&I use within the Imperial Valley. This amount is twice the expected growth in M&I use within the IID water service area over the next 45 years. Therefore, the Proposed Project and Alternatives described in the Draft EIR/EIS can be implemented without compromising the Imperial Valley's urban water supply. IID will continue to make water deliveries reasonably required for municipal and industrial beneficial uses, including current use and expected growth in these sectors. Also please see the Master Response on *Socioeconomics—Property Values and Fiscal Impact Estimates*.

L1-1

L1-1 c. economic distress not only to individual farmers but also to the County's secured and unsecured tax revenues, and to social service programs and agencies must be addressed and refined.

L1-2 (2) According to the summary document in "Appendix A" of the Draft EIR/EIS the IID/SDCWA Water Transfer Agreement was initially executed by these parties on April 29, 1998, and then revised again on December 18, 2001. The water transferred for IID to SDCWA will originate in Imperial County. Therefore, the environmental effects created by the water transfer greatly impact the County, its farming community, and its citizens. The final DEIR/EIS should include sufficient and much more detailed information to provide the political consensus to support the water transfer. It is imperative that all of the agencies, their governing boards and staff work together to create a dialogue that will create a positive outcome for all parties involved.

L1-3 (3) The DEIR/EIS attempts to address the impacts of the water transfer on agriculture in Imperial County. However, the document does not address the impacts that will occur to the County's future needs outside the agriculture realm. Imperial County will in the next twenty (20) years be doubling its population from 142,000 to 294,000 (June 2000 – California Department of Finance "Interim County Population Projections"). Furthermore, according to the IID's "2000 Urban Water Management Plan", the urban areas within the County have grown rapidly, e.g. approximately 42 percent in the past ten (10) years. Page 14 of the Plan, indicates that the existing urban areas in the County represent 63,700 acres. The Draft EIR/EIS must identify how this transfer and future projects will ensure enough water to remain in Imperial County to meet future needs of both domestic and urban water users or, in the alternative, at least propose adequate mitigation measures in order to achieve these objectives.

#### **GROWTH INDUCING IMPACTS**

L1-4 (5) Throughout the DEIR/EIS, the document concludes that the water transfer is solely a "replacement" of water that could be lost due to the federal enforcement of California's 4.4 allotment. However, according to SDCWA's 2000 Urban Water Management Plan (UWMP) indicates that water transfers are the "greatest potential to meet their future demands". Therefore, much of the analysis and certainly the conclusions are flawed because the "baseline" is significantly different. Additionally, the UWMP has quite dramatically left the door open for San Diego region to request further water transfers from Imperial Valley to meet their anticipated increase in demands. The UWMP also mentions that there is going to be a need for increased water supplies and that the 4.4 directive will reduce San Diego's ability to get surplus Colorado River Water and to create a more stable and diverse supply to off-set dry years.

L1-5 (6) The Draft EIR/EIS concludes that the water transfer will simply change the distribution of existing California water supplies from the Colorado River and will not be changing the existing water supply in Southern California. However, the transfer will change future supply and will change use from agricultural (Imperial Valley) to urban (San Diego). The

#### **Response to Comment L1-2**

We believe the EIR/EIS is a good faith and reasonable effort to identify and assess the environmental impacts of the Project and feasible mitigation measures, based upon available information and assessment methods. The Lead Agencies will consider all public comments on the EIR/EIS and evaluate the risks and costs of the Project before committing to proceed, and farmers will evaluate the advantages and disadvantages in the voluntary on-farm program before deciding whether to participate in the water conservation program.

#### **Response to Comment L1-3**

The Proposed Project involves implementation of agricultural water conservation measures only. Under the terms of the Quantification Settlement Agreement, IID will retain the ability to divert in excess of 2.6 MAFY for agricultural, industrial, and domestic use within the current IID water service area. In addition, at the end of the initial 45-year term, the IID/SDCWA transfer agreement potentially allows IID to reclaim up to 34 KAFY of transfer water for municipal and industrial use within the Imperial Valley. This amount is twice the expected growth in municipal and industrial use within the IID water service area over the next 45 years. Therefore, the Proposed Project and Alternatives as described in the Draft EIR/EIS can be implemented without compromising the Imperial Valley's urban water supply. IID will continue to make water deliveries reasonably required for municipal and industrial beneficial uses, including current use and expected growth in these sectors.

#### **Response to Comment L1-4**

Please refer to the Master Response on *Other — Growth Inducement Analysis* in Section 3 of this Final EIR/EIS for a discussion of the potential growth inducement impacts in the SDCWA Service Area. In response to the comment concerning additional water transfers from the Imperial Valley, the Water Conservation and Transfer Agreement between IID and SDCWA stipulates a transfer amount of up to 300 KAFY for a period of up to 75 years. Any additional water transfer agreements between IID and SDCWA or any other water purveyor would require a separate agreement and corresponding environmental documentation.

### **Response to Comment L1-5**

While the Proposed Project proposes to change the use of Lower Colorado River water conserved and transferred from IID to SDCWA from agricultural to M&I use, a change in future water supply to SDCWA would not occur. Please refer to the Master Response on *Other—Growth Inducement Analysis* in Section 3 of this Final EIR/EIS for a discussion of the potential growth inducement impacts in the SDCWA service area. The Proposed Project would not provide new water for new development in the San Diego region, but would only secure more reliable water supplies for existing customer demand. In addition, the Proposed Project does not involve construction of any new SDCWA facilities, and no new water pipelines or aqueducts are proposed. The water transferred from IID would be transported via the existing MWD Colorado River Aqueduct and other existing transmission facilities. No new delivery systems are proposed that would provide water to currently undeveloped lands.

Draft EIR/EIS should make note of this important issue in light of the newly enacted legislation (SB 221 and SB 601) imposing stricter requirements for new development to be founded on assured drought-year supplies. As stated above, this transfer is not a redistribution of existing water supplies, but in actuality, is considered to be a "new water" source by the San Diego County Water Authority, memorialized in a memo from Marureen Stapleton (SDCWA General Manager). The current SDCWA urban management plan projects a fixed 303,630 AFA "firm" supply from Metropolitan from now to 2020 based on MWD's represented 2.1 MAF "firm" supply. But as the QSA EIR indicates, without the SQA and IA projects, MWD would lose approximately 650,000 AFA from the Colorado, reducing its "firm" supply from that source and the State Water Project to a combined total of approximately 1.6 MAF (660,000 AFA from the Colorado, plus approximately 50 percent of MWD's 2.1 MAF SWP "entitlement"). (These expectations reflect normal deliveries; in time of drought the MWD supply would be even smaller.) Not surprisingly, the San Diego County 2000 Urban Water Management Plan also shows that this water transfer is vital in order to maintain San Diego's current "expectation" of serving a population that is continuing to grow and will rise to over 3.8 million by the year 2020. This gain represents an annual increase of about 50,000 people, for an annual growth rate of about 1.5%. The future growth will be enhanced by the transfer. The Final EIR/EIS must recognize and quantify the growth inducing impacts of the water transfer in the water-receiving communities.

L1-5

(7) The San Diego Region is expected to add more than 500,000 new jobs and the population is expected to increase by more than a million people by 2020 (SANDAG, "Measuring the San Diego Region's Livability"). San Diego will also have to provide more than 400,000 new houses and expand their infrastructure to accommodate the new jobs and people. An important aspect of this "infrastructure" is making enough water available to San Diego to provide this type of "build out" for San Diego to accommodate the addition of over one million people over the next 20 years. The most important infrastructure items (as noted by SANDAG) include a more securing a more reliable water supply than the existing condition. Even the communities surrounding San Diego County are growing. For instance, Riverside County grew by 3% and to the south Tijuana grew by 5%, all increasing the dependence of imported water.

L1-6

(8) More than 90% of the San Diego region's water is imported from the Colorado River and northern California in any given year. And, last year San Diego region used approximately 620,000 acre-feet of water. Increasing population and jobs within the San Diego region will require the development of additional water supplies and should include water conservation, water recycling and brackish groundwater recovery. All of these options should be analyzed and quantified as part of an overall strategy. Conservation measures must include implementing Urban Water Conservation Best Management Practices (BMPs) and Agricultural Efficient Water Management Practices (EWMPs) (Regional Report on Water Supply and Infrastructure, November 2001).

L1-7

### **Response to Comment L1-6**

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

### **Response to Comment L1-7**

Please refer to the Master Response on *Other—Desalination in SDWCA Service Area and Comments Calling for Increased Conservation* in Section 3 of this Final EIR/EIS.

L1-8 (9) Desalination offers a viable alternative to the water transfer. Desalination is never mentioned in the Draft EIR/EIS as a possible future source of water as an alternative source of water for San Diego region. Projects currently being developed in Florida indicate that the cost of desalination plants may have decreased such to a point where it now can be considered a potential option for coastal areas including San Diego. This is especially promising as desalination feasibility increases over time and thereby enabling the water transfer to decrease over time.

L1-9 All alternatives that are reasonably possible should be addressed in the Final EIR/EIS. SDCWA considered several sources to identify projected imported and local resources to meet future water demands. These factors included: projected water demands utilizing SANDAG 2020 Cities/Count Forecast; local agency input into future projected water recycling and groundwater supplies; technical evaluations of potential new supplies (i.e. seawater desalination); and, previous actions taken by Board of Directors regarding imported supplies. (Page 14, Regional Report on Water Supply and Infrastructure, November 2001). The Draft EIR/EIS does not identify the potential of these alternative sources of water in order to meet the demands of the San Diego region. These appear to be viable options, which may lessen the need for large amounts of water to be imported from outside San Diego to meet its need at the cost of the region from which the water is originating.

L1-10 (10) Instead of solely relying on water transfers to meet infrastructure needs resulting from future growth demands in San Diego region, San Diego should be working to implement, recycling and groundwater recovery programs, desalinated seawater, local groundwater source known as the "San Diego Formation" and also, to encourage citizens to pro-actively conserve water. In summary, the Final EIR/EIS needs to develop, analysis and consider these different alternatives in contrast to the transfer as currently proposed.

#### AIR QUALITY

L1-11 (11) Imperial County's concerns lie in fact that the potential air quality impacts that might result from long term water transfer described in the Draft EIR/EIS would interfere with the attainment of the National Ambient Air Quality Standard (NAAQS) for PM-10s. Recently, the USEPA have issued a determination that Imperial County would be in attainment of the NAAQS Standards form PM-10, but for transportation emanating from Mexico (66 Fed. Reg. 53106, October 2001). Thus, the current levels of particulate matter in the air in Imperial County exceed the NAAQS because the particulate matter is transported from Mexico. Additional, particulate matter generated from within Imperial County as a result of the water transfer could further increase the concentration of particulate matter in Imperial County and could jeopardize "attainment designation" under the Clean Air Act.

#### Response to Comment L1-8

Please refer to the Master Response on *Other—Desalination in SDWCA Service Area and Comments Calling for Increased Conservation* in Section 3 of this Final EIR/EIS.

#### Response to Comment L1-9

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

#### Response to Comment L1-10

Please refer to the Master Response on *Other—Desalination in SDWCA Service Area and Comments Calling for Increased Conservation* in Section 3 of this Final EIR/EIS.

#### Response to Comment L1-11

Refer to the Master Response on *Air Quality—Consistency with the State Implementation Plan for PM10* in Section 3 of this Final EIR/EIS.

L1-12 [ (12) There are two effects of water activities that lead to the increases in PM-10 emissions that should be mitigated. These include emissions from fallowed land and emissions from exposed portions of the Salton Sea.

L1-13 [ (13) The County believes that the IID/SDCWA water transfer will result in new PM-10 emissive areas in Imperial County which in turn will lead to an exceedance of the PM-10 standard. County would like to see these concerns addressed in the EIR/EIS and how the EIR/EIS plans to mitigate these new emissives.

L1-14 [ It is apparent from the DEIR/EIS that water conservation is the key component. The County is most interested in minimizing evaporation or transpiration of water into the air. The DEIR/EIS fails to mention any mitigation to offset evaporation/transpiration of water. The DEIR/EIS should more closely examine: issue of covering canals and whether that would result in reductions in evaporation; ranking of farming conservation measures and which reduce evaporation loss; and, evaluation of other evaporation reduction measures.

L1-15 [ (14) Adequate discussion in the Final EIR/EIS should revolve around mitigation measures to ensure that fallowed lands are not emissive as a result of the water transfer. Specifically, it should address the possibility of fallowing fields of crop such as alfalfa or other grain which would result in more stabilized ground leading to less emission than other crops.

L1-16 [ The air quality discussion surrounding the effects of the Salton Sea and increased exposure of the lakebed due to water recession is inadequate and also based upon some erroneous data.

L1-17 [ (15) The arguments explaining why the exposed areas of the Salton Sea would not create an emissive source are unconvincing. The document's main arguments on this issue center around soil chemistry, meteorology and recession rate. First, there are definite disturbed and undisturbed portions of the desert adjacent to the Salton Sea that could initiate dust emissions from the exposed portion of the lakebed. Second, also problematic in the EIR/EIS is the discussion with regard to the wind roses for the Salton Sea area. In a separate study done by an outside consultant, the wind speeds are higher and the wind roses contained in the Draft EIR/EIS Figures 3.7-5 (page 3.7-14) for Salton Sea North site are incorrect. The Draft EIR/EIS does not adequately represent the highest wind speed sites around the Salton Sea area. More accurate sites should have been used to collect this data and should have been accounted for in the mitigation measures discussion of the Draft EIR/EIS. Specifically, wind data from the Salton Sea East (#128) should have been used and correct data from Salton Sea North (#154) numbers are flawed. Also flawed is the discussion on page 3.7-35 regarding dust suspension because it only considers hourly winds and does not account for wind gusts that can suspend dust. Third, the discussion surrounding recession rate in the Salton Sea Emissive issues section, is inadequate. The argument that Salton Sea will not become another Owens Lake revolved around the argument that the recession rate of the Salton Sea will be much slower than Owens Lake which went dry over several years.

#### **Response to Comment L1-12**

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

#### **Response to Comment L1-13**

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

#### **Response to Comment L1-14**

Evaporative losses from IID canals are estimated to be less than 40 AFY. The amount of water that could be conserved versus the high cost of pipelining canals (\$1.8 to \$2.6 million/mile) makes covering canals neither reasonable nor feasible. Over 1,100 of IID's 1,465 miles of canals are lined with concrete. Lining reduces seepage losses and also reduces canal bank vegetation, there by reducing phreatophyte evapotranspiration losses.

Transpiration refers to the movement of water from the crop root zone through the plant and release to the atmosphere through the leaf stomata. Deficit irrigation, and associated yield and quality losses, and fallowing are the only feasible methods of reducing crop transpiration.

#### **Response to Comment L1-15**

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

**Response to Comment L1-16**

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 L1-17**

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.



L1-17 However, the EIR/EIS fails to take into account the fact that when Mono Lake recessed slowly over a number of years, its exposed shoreline was emissive and causes violations of PM-10 standards.

L1-18 (16) Where fallowing permanently removes land from agricultural use due to the perched groundwater in Imperial County, fields fallowed will degrade as a result of salt seepage from the perched groundwater via capillary effects. This phenomenon known as "souring" will result in the effective destruction of farmlands that have been fallowed from more than five (5) years. The Draft EIR/EIS does not address these impacts resulting from long term fallowing.

L1-19 (17) Overall, the specific issues which should be addressed in relation to the Air Quality impacts should include: the Final EIR/EIS should consider the whole spectrum of water conservation measures in addition to fallowing; fallowing mitigation measures should be strengthened to adequately address the air quality impacts associated; meteorological analysis should correct the errors in their calculations; and, the conclusion that the Salton Sea will not be an emissive source should be corrected and adequate mitigation measures should be set forth for this issue in the Final EIR/EIS; the Draft EIR/EIS does not address the monetary mitigation of air quality impacts; the amount of water that mitigation of air quality impacts from fallowed lands will require; how to determine whether mitigation of air quality impacts is effective; or, who will ensure that mitigation measures are properly carried out. The Draft EIR/EIS does not provide assurances that the emissions that result from fallowed lands can be mitigated to a level of insignificance.

L1-20 (18) Within Appendix B, page 3-5, "Final Scoping Summary Report", March 10, 2000, Section 3.2.5 Air Quality, it states that "...land fallowing...(may result in)...potential increases in particulate matter caused by...land fallowing..." There is a need to establish an air quality baseline to monitor any increases in PM-10 emissions from any agricultural lands that are "fallowed" (permanent or temporarily), e.g., from fugitive dust emissions, weed proliferation and/or wind-borne seed/pollen impacts on neighboring landowners and County residents.

L1-21 (19) When dealing with air emissions and pollutants, there is no recognition of international borders and any future PM-10 emissions from exposed Salton Sea shoreline will further degrade the already impacted air quality of the Salton Sea Air Basin. The Imperial County APCD's statutory duty is to protect and enhance the quality of the air resources within its jurisdictional limits. Any proposal, whether by a public entity or special district, that creates the possibility of environmental damage to local air quality, must be closely reviewed and the cumulative impacts must conform to federal, state and local laws and regulations.

L1-22 (20) Additionally, we incorporate by reference the comments and analysis provided for in the attached report by Environ International Corporation. (Attachment "A")

### **Response to Comment L1-18**

Water users within IID use water diverted from the Colorado River to irrigate crop land. On average, Colorado River water contains approximately one ton of salt per acre-foot of water. As water is transpired by crops, the salt remains in the soil. In order to maintain the productivity of the land, the accumulated salts must be leached from the root zone. IID water users apply a small amount of additional leach water to carry accumulated salts below the crop root zone. Approximately 96 percent of farmed fields within the IID water surface area are underlain by tile drainage lines. These tile drainage lines collect the leach water and dissolved salts and convey them to the IID drainage system.

Tile lines are normally placed at depths of 5 to 7 feet below the land surface and maintain the groundwater level at that depth, even in areas with high water tables or poor natural drainage. For all Imperial Valley soils, that depth is sufficient to prevent groundwater, and any salt it may carry, from seeping to the surface. Therefore, should the water conservation and transfer program ultimately include a rotational or short term fallowing component, groundwater will not impact the stability of the soil surface, nor will the land "sour" due to excessive salt build up.

### **Response to Comment L1-19**

Please refer to the following Master Responses in Section 3 of this Final EIR/EIS: *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan*; *Air Quality—Air Quality Issues Associated with Fallowing*, and *Air Quality—Wind Conditions at the Salton Sea*.

### **Response to Comment L1-20**

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

### **Response to Comment L1-21**

Please refer to the following Master Responses in Section 3 of this Final EIR/EIS: *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan*, *Air Quality—Air Quality Issues Associated with Fallowing*, and *Air Quality—Wind Conditions at the Salton Sea*.

### **Response to Comment L1-22**

Comment noted. See the referenced attachment for full response.

**SOCIOECONOMICS**

L1-23 (21) In a 1999 Board Resolution, the Imperial Irrigation District Board stated, "...The terms of any final comprehensive settlement agreement must not unfairly impose burdens on the agricultural economy of the Imperial Valley in order to benefit the nonagricultural economy of the Coachella or MWD's service area". We concur with this IID statement of policy for protecting the agricultural economy of Imperial County.

L1-24 (22) Page 1-29 of the DEIR/EIS states that the water transfer is an "economic stimulus to the Imperial Valley". The concept of removing a portion of the limited water supply to another community appears counter-productive to future growth and development in the community. The transfer of water will result in a reduction of available water. This transfer will either result in removing farmland from production or require the installation of expensive conservation methods on fields, both of which could have a negative economic impact on Imperial County.

L1-25 (23) The economic impact of removing farmland from production could have a significant direct impact on agricultural production and an indirect affect on farm-related support businesses; the housing and commercial sectors. The result will be that Imperial Valley's economy could be devastated. Farming communities tend to be interdependent, so impacts on one community could be felt by a number of surrounding communities. Taking nearly a fifth (20%) of the farmable land out of production, while not providing any quantifiable benefit would surely damage and may even destroy the economy and have a "ripple effect" on the surrounding communities. The Draft EIR/EIS does not quantify how these impacts would be mitigated. Any mitigation needs to analyze the impacts of land fallowing with regard profit per acre or profit per acre foot of water, when assessing value per acre and labor (jobs) per acre.

L1-26 (24) Section 5.1.2.7 ("Socioeconomics"), under ("Cumulative Impacts, under Section 5 "Other CEQA/NEPA Considerations), of the Draft EIR/EIS states that there are expected potential impacts from implementation of the Proposed Project as follows:

"A reduction in employment opportunities may result depending on the specific type and amounts of water conservation methods that are selected. Employment opportunities may decline if the amount of land that is fallowed increases, while jobs would be created by the construction and operation of on-farm irrigation system water conservation measures. Depending on the relative proportion of the conservation measures, an impact or benefit may accrue through implementation of the Proposed Project. The other projects identified above could also result in construction and operational demands that increase employment opportunities in Imperial County".

Further, the statement is made that "The Proposed Project would therefore, have no or a minor impact to the socioeconomic resources and would not contribute to a cumulative impact". As discussed previously, the "permanent fallowing" of agricultural lands in Imperial County, no matter what "water conservation methods that are selected" could be

**Response to Comment L1-23**

Comment noted.

**Response to Comment L1-24**

Page 1-29 of the Draft EIR/EIS states, "IID anticipated that the proceeds from the sale of conserved water would provide economic benefits to cooperating landowners, tenants, and IID, and an economic stimulus to the Imperial Valley." This statement is true with regard to the anticipated socioeconomic effects of the Proposed Project, unless a substantial portion of the conserved water is generated by fallowing. The adverse effects of fallowing are described in Section 3.14 of the Draft EIR/EIS. Regarding the availability of water for agricultural production, see response to Comment L1-3.

**Response to Comment L1-25**

The socioeconomic effects of fallowing are described in Section 3.14 of the Draft EIR/EIS. As described in the Draft EIR/EIS, depending on the eventual implementation of the water conservation program, there could either be beneficial or adverse impacts to the regional economy. If water is conserved using on-farm and water delivery system improvements, it is anticipated that there would be beneficial effects to regional employment; therefore, there would not be any adverse effects to mitigate. If fallowing is used to conserve all or a portion of the water to be transferred, there would be adverse effects to the regional economy and farm workers as identified in the Draft EIR/EIS.

The IID Board will consider whether to implement socioeconomic mitigation measures when it considers whether to approve the Proposed Project or an alternative to the Proposed Project.

**Response to Comment L1-26**

No cumulative socioeconomic effects would result from implementation of the Proposed Project and/or Alternatives in conjunction with the other projects included in the cumulative impact analysis because all of the other projects in the analysis would add jobs, in connection with construction and operation of project facilities, in Imperial County. There is no cumulative impact unless the adverse impacts of the Proposed Project and/or Alternatives are exacerbated by implementation of one or more of the projects included in the cumulative impact analysis.