



California Regional Water Quality Control Board Colorado River Basin Region



Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

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

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

Dear Mr. Ellis and Mr. Grubaugh:

RE: IMPERIAL IRRIGATION DISTRICT WATER CONSERVATION AND TRANSFER PROJECT
DRAFT HABITAT CONSERVATION PLAN/DRAFT ENVIRONMENTAL IMPACT
REPORT/ENVIRONMENTAL IMPACT STATEMENT

Thank you for providing us the opportunity to comment on the subject document.

The EIR/EIS as now written presents a very limited scope of impacts from water conservation and transfer, particularly pertinent to the Salton Sea. The primary concern is its failure to weigh the impacts of various water transfer alternatives with reasonable Salton Sea restoration alternatives, such as utilization of constructed evaporation basins to stabilize the Sea's salinity. The subject document appears to either presuppose that there will be no Salton Sea restoration or simply ignore the question. The important question is not how much faster the Salton Sea's demise will be with a water transfer, but rather how a Salton Sea restoration project can be successfully accomplished in conjunction with water transfer and conservation implementation. The document inadequately responds to that topic.

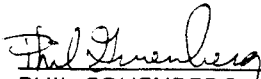
Although a preferred Salton Sea restoration project has not been selected or funded, the potential has not been eliminated either, and the research by the Salton Sea Authority, U.S. Bureau of Reclamation, and others seems very close to a decision point on a restoration project. The transfer of water and the Salton Sea restoration are interconnected and should not be considered independently.

The EIR/EIS presents a Habitat Conservation Plan as an alternative to mitigate the impacts from the demise of the Salton Sea, but the mitigation largely focuses on only one of the Sea's many beneficial uses—threatened and endangered species. All the other beneficial uses of the Sea are essentially ignored—boating, fishing, wildlife habitat, water sports, the local economy etc. In general, this approach seems unbalanced, and biased against wholly restoring the Sea and all its beneficial uses.

California Environmental Protection Agency

Regional Board staff are undergoing a careful review of the subject document, and their much more detailed comments should be forthcoming shortly. If you have any questions, please contact me at (760) 346-7491.

Sincerely,


PHIL GRUENBERG
Executive Officer

PG/kg

cc: Region 7 Board Members
Celeste Cantu-SWRCB
Lori Okun-SWRCB-OCC
Eugenia McNaughton-USEPA
Tom Kirk-Salton Sea Authority, La Quinta
Michael Walker-U.S. Bureau of Reclamation
Basin Planning Interested Parties List

File: BP WT