



# CITY OF INDIO

VIA FACSIMILE & US MAIL

October 10, 2002

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Victoria Whitney, Program Manager  
Hearings and Special Projects Section  
Division of Water Rights  
State Water Resources Control Board  
P.O. Box 2000  
Sacramento, CA 95812-2000

Re: Petition of Imperial Irrigation District and San Diego County Water Authority

Dear Ms. Whitney:

The City of Indio would like to submit a written protest against the conclusions of the environmental document and the planned water transfer between San Diego and the Imperial Irrigation District.

We support the arguments and conclusions of both the Coachella Valley Association of Governments (CVAG) and the Coachella Valley Water District (CVWD), both of which have submitted written objections.

Both of the proposed methods of reducing water usage (Conservation through the use of "Pump-Back Systems" – which capture water and recycle it; and the long-term Fallowing of Agriculture Land – taking farm land out of production) by the Imperial County farmers will result in harsh and significant unavoidable impacts on the Salton Sea.

Irrigation runoff is the only thing keeping the Salton Sea alive. Cutting off the runoff would cause the sea's surface to shrink much faster than it already is. This would expose more and more of the sea's bed to the wind, blowing dust and the harmful residues of pesticides from irrigation runoff into the air, where it could make residents living in Coachella and Imperial Valleys very sick. The air quality impact greatly concerns us, as we cannot support a proposal that would induce unhealthy air quality degradation arising from either an exposed Salton Sea shoreline or a programmatic fallowing of agriculture land. The Coachella Valley is already in a non-attainment PM-10 status; this will only increase the problem.



Other areas of Southern California, as well as the San Diego area need supplemental water supplies and water supply reliability for present and future customers. This proposed transfer could subvert the priority system among other water agencies, and should be subjected to alternative analysis and environmental documentation. IID's Colorado River water entitlement is limited to water that has been put to actual reasonable and beneficial use within the IID service area. IID has no right to divert the water proposed to be transferred, because it is not now being put to reasonable use (i.e., if a portion can be conserved, then that portion is presently being wasted). Agreements dating from 1931 (the Seven Party Agreement dated August 18, 1931,) and 1934 (the Compromise Agreement between IID and CVWD dated February 14, 1934,) gave IID a prior right to water over CVWD "exclusively for the use in the Imperial service area"; and the Seven Party Agreement requires water to become available for reasonable and beneficial use by the next priority holder (in this case CVWD) when it is not put to reasonable and beneficial use by the preceding priority holder (IID).

CVWD and the Indio Water Authority (as well as other municipal water companies in the Coachella Valley) currently share from the same groundwater system. We believe that this decision to export water significantly impacts the CVWD, which would result in increased usage of a limited shared groundwater source within the Coachella Valley.

Sincerely,



Ben Godfrey  
Mayor

cc: Tom Ramirez, City Manager  
Terry Hagen, Director of Public Works/City Engineer