

IMPERIAL IRRIGATION DISTRICT

ENVIRONMENTAL, REGULATORY AND EMERGENCY PLANNING • P.O. BOX 937 • IMPERIAL, CA 92251
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GS-EREP

July 19, 2010

Ms. Kimberly Nicol,
Project Manager
California Department of Fish and Game
78078 Country Club Drive, Suite 109
Bermuda Dunes, CA 92203

SUBJECT: Notice of Intent To Prepare a DEIS/DEIR for a Permit Application for the Proposed Salton Sea Species Conservation Habitat Project at the Salton Sea, in Riverside and Imperial Counties, CA

Dear Ms. Nicol:

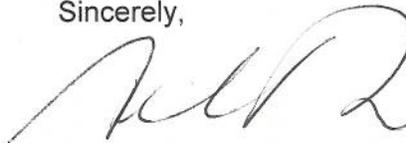
In regards to the Notice of Intent to Prepare a Draft Environmental Impact Statement/Environment Impact Report (DEIS/DEIR), dated June 14, 2010, that the California Natural Resources Agency is preparing in conjunction with the U.S. Army Corps of Engineers (Corps), the Imperial Irrigation District (IID) has the following comments:

1. IID understands that the emphasis is on fish habitat (to provide forage for birds), but strongly encourages the development of the habitat project to provide as much habitat as practical for additional species that also utilize the Salton Sea.
2. IID would like to coordinate with the state on the location of the habitat project. To the extent it is practical, given the habitat goals of the project; the habitat should be located in a manner than will maximize mitigation of dust emissions from the Salton Sea playa. Additionally, the project should be compatible with the mitigation planned for the Quantification Settlement Agreement water transfer and other projects.
3. The project should be designed to accommodate other land uses such as alternative energy development, agricultural use and recreational use.
4. The project and its water conveyance systems should be designed to minimize impacts to the water delivery and drainage infrastructure in place around the rivers, drain and other agricultural facilities. Any increase in water surface elevations, in the drains or rivers will impact field irrigation infrastructure and drainage. Impounded areas (habitat ponds) may raise water table elevations in the surrounding areas and impact the tile drainage systems in the farm fields.

5. IID appreciates the opportunity to provide input at the recent stakeholder workshop and encourages the state to have additional stakeholder group meetings to discuss the project as the design progresses.
6. The project should be planned and implemented to avoid impacts to area farmers and to productive agricultural land.
7. The project should evaluate the potential to harvest shallow groundwater for use in the cells.
8. On page 3, Attachment A, Section 1.0 Description of the Project Overview, contained in the NOP of the Draft EIS/EIR distributed by the California Natural Resources Agency on June 21, 2010, the ninth sentence states "Figure 1 shows generalized location of where the SCH Project could be constructed." Shallow pond and wetland complex site locations are not specified. Once the shallow pond and wetland complex site locations are determined, the IID Water Department will need to be notified directly.
9. Proposed shallow ponds and wetlands will impact IID's property in the Salton Sea area. Any construction or operation on IID property or within its existing and proposed rights of way or easements, including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities will require an encroachment permit. No foundations or buildings will be allowed within the right of way. A copy of the encroachment permit application is included in the IID 2008 Developer Project Guide. This guide can be found at: <http://www.iid.com/Media/Developer-Project-Guide-2008.pdf> website. For more information regarding encroachment permits, the IID Real Estate Section at (760) 339-9239 should be contacted.

Should you have any questions, please do not hesitate to contact me by phone at 760-482-3609 or by e-mail at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Sincerely,



Donald Vargas
Environmental Specialist I

cc. Ms. Lanika Cervantes - U.S. Army Corps of Engineers, Los Angeles District, Regulatory Division, San Diego Field Office.