

UNITED STATES GYPSUM COMPANY EXPANSION/MODERNIZATION PROJECT

IMPERIAL COUNTY, CALIFORNIA

FINAL ENVIRONMENTAL IMPACT REPORT/ ENVIRONMENTAL IMPACT STATEMENT

Volume I

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Lead Agencies:

CEQA
County of Imperial
El Centro, California

NEPA
Bureau of Land Management
El Centro Field Office

JANUARY 2008

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JANUARY 2008

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Executive Summary

ES.1 Introduction

This Final Environmental Impact Report/Environmental Impact Statement (Final EIR/EIS) has been prepared in compliance with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) to inform the public and to meet the needs of local, State, and Federal permitting agencies to consider the project proposed by United States Gypsum Company (USG). Its purpose is to address the environmental impacts of the expansion/modernization of the existing USG gypsum processing and wallboard manufacturing facility and gypsum quarry in the Imperial County, California.

ES.2 CEQA/NEPA Compliance

The final processes for completion of CEQA and NEPA are described separately below:

CEQA

The County of Imperial (County) is the CEQA Lead Agency. To certify the Final EIR/EIS, the County must find that:

- the Final EIR/EIS has been completed in compliance with CEQA; and
- the Final EIR/EIS was presented to the decision-making body of the lead agency, and the decision-making body considered and reviewed the information contained in the Final EIR/EIS prior to approving the project; and
- the Final EIR/EIS reflects the lead agency's independent judgment and analysis (State CEQA Guidelines, Section 15090).

After the County certifies the Final EIR/EIS, the County may decide whether and how to approve the Project and must adopt findings of fact regarding the significant effects identified in the Final EIR/EIS (State CEQA Guidelines, Sections 15091-15093).

NEPA

The Bureau of Land Management (BLM) is the NEPA Lead Agency. The Final EIR/EIS will be filed with the U.S. Environmental Protection Agency (EPA), and the Notice of Availability (NOA) will be published in the Federal Register announcing the availability of the Final EIR/EIS. After a minimum 30-day waiting period, BLM will issue a Record of Decision (ROD) stating the decision and describing the alternatives considered; the environmentally preferred alternative; the factors considered with respect to the alternatives, environmental commitments, and mitigation measures to be applied to the action; any monitoring and enforcement program to be established; any significant comments received on the Final EIR/EIS; and responses to those comments.

ES.3 Public Review and Consultation Process

In accordance with both the specific requirements and the intent of CEQA, the environmental review process for the proposed Project has included substantial opportunities for public and agency review and comment on the environmental evaluations. As a result of the degree of public interest in the Project, a substantial number of comments were submitted on the Draft EIR/EIS during the public review period. Approximately 557 comment letters were submitted. In addition, commenters presented verbal comments at the scoping meeting. Written comments are contained in Section 5.0, Response to Comments, of this Final EIR/EIS.

The public comments received did not change the analyses or conclusions regarding environmental impacts of the Project presented in the Draft EIR/EIS. Instead, the input resulted in the adoption of some modification of mitigation measures described in the Draft EIR/EIS. These modified mitigation measures are included in Table ES-1.

The majority of submitted comments were general in nature and expressed concern regarding traffic, hydrology, air quality, and noise, as well as potential effects on area roads and compatibility of the Project with agricultural use and biological concerns. Few of these commenters asked questions that had not already been evaluated in the Draft EIR/EIS. Individual responses are in Section 5.0 and are also cross referenced to specific collective responses in Section 4.0 for clarification and consistency.

These general concerns are collectively addressed as summarized responses in Section 4.0, Collective Responses. Clarification on the environmental evaluations and recommendations in the Draft EIR/EIS is provided.

A number of agencies, organizations, businesses, and individuals submitted specific comments or opinions based on review of the Draft EIR/EIS. The majority of these comments requested clarification on specific points addressed, while some provided suggestions on the evaluation of impacts and determination of specific mitigation measures. Replies to comments from agencies, businesses and organizations are provided in Section 5.0. Responses to individuals whose concerns were representative of public comment or who had detailed questions or suggestions regarding the Project are presented in Table 5.0-2, Private Citizens.

ES.4 Proposed Project

The proposed Project is modernization/expansion of USG's manufacturing facilities at its Plaster City Plant (Plant) and gypsum quarrying operations at its Plaster City Quarry (Quarry) that supports the Plant. A new 10-inch diameter water pipeline 8.5-miles long would replace the worn 8 inch water pipeline from the wells at Ocotillo to the Plant. The new 10-inch pipe would provide a more reliable water supply, minimizing line surges and associated leaks/ruptures, providing a quicker water system recovery after waterline breaks/leaks or maintenance, and improving fire protection at the Plant. Installation of an approximate 14.4 megawatt (MW) cogeneration unit is also proposed to provide heat to the Plant to dry wallboard as well as provide electrical power for the Plant. This unit would be sized to provide electrical power for the entire Plant while delivering waste heat to the No. 3 kiln to assist in drying wallboard, reducing the amount of heat needed by the kiln. The natural gas would be delivered through the existing pipeline.

Part of the modernization/expansion Project includes an off-specification material recycling system. This system is designed to chop up out-of-specification wallboard from the Inert Material Storage Area (IMSA) and feed it back into the Plant production process with raw gypsum rock.

The proposed Project at the Quarry consists of the improvements already made to the crushing and loading facilities plus additional components identified here. A new production water well (for on-site activities), proposed Well No. 3, would be drilled and water transported by a pipeline installed alongside of the existing alignment of the narrow-gauge railroad to the Quarry facilities. In conjunction with the development of the pipeline, USG would install an electric supply to serve the well pump. The proposed Project also includes a reclamation plan for the extent of USG mineral holdings.

Federal policy favors maintaining a viable mining industry for the development of domestic mineral resources. To help assure satisfaction of the nation's industrial and security needs, federal policies encourage private enterprise in the economic development of domestic mineral resources. The Mining Law of 1872 (20 USC 22 *et seq.*) opened the public lands to exploration and development, granting a person who discovers valuable mineral deposits the right to extract and sell these minerals. This policy was reaffirmed in the Mining and Minerals Policy Act of 1970 and the National Materials and Minerals Policy, Research and Development Act of 1980. The 1970 Legislation stated that an "economically sound" mining industry was important for both economic and national security reasons. The 1980 Act noted the need to encourage mineral exploration. Quarrying of gypsum has been occurring at the Plaster City Quarry since 1921. USG has been quarrying gypsum at the site since 1946.

ES.5 Project Location

Regional Location

Imperial County is within the Colorado Desert, marked by land with relatively low elevations, some areas even below sea-level. The western portion of Imperial County is characterized by a series of low lying mountain ranges opening to the Salton Sea and Imperial Valley.

Plant

USG produces wallboard and related gypsum products at the Plaster City Plant located at 3810 West Highway 80, Plaster City, California, approximately 18 miles west of the City of El Centro. Access to the Plant is via Highway 80, immediately north of Interstate 8.

Water Supply

Water for processing and manufacturing purposes at the Plaster City Plant is currently delivered via an 8-inch diameter pipeline from a well field located approximately 8 miles west of Plaster City in the Ocotillo-Coyote Wells Groundwater Basin (Basin). USG proposes the replacement of this existing aging pipeline with a new pipeline.

Quarry

The Quarry and ore crushing facilities supplying the raw material to the Plant are located approximately 26 miles north of Plaster City, at the Plaster City quarry.

Lands used for mining by USG encompass approximately 1,640 acres of private lands and 380 acres of claims on federal lands currently administered by the BLM and 28 acres of mill sites. USG has applied for patenting of these claims.

The Quarry is located at 7801 Split Mountain Road near Ocotillo Wells. Access to the Quarry is via State Highway 78 from San Diego County and Imperial County. The Quarry is approximately 9 miles south of the intersection of Highway 78 and Split Mountain Road.

Transport of ore from the Quarry and crushing operation to the Plant is via a USG owned narrow-gauge railroad.

ES.6 Project Objectives

USG's Objectives

The overall goals of the Proposed Action are to:

- Maximize use of known resources;
- Expand production facilities, equipment and personnel; and
- Maximize the return on capital investment.

The Proposed Action consists of three (3) general components: (1) the Plaster City Plant upgrade and expansion; (2) the increased water usage for quarrying and processing purposes; and (3) the expansion of the mining operation at the Plaster City Quarry. The applicant's objectives in these three areas are as follows:

Plant

- Meet current and future residential and commercial building products demand in the southwestern United States.
- Fulfill estimated operational design life of the Plant.
- Replace an older, less-efficient production line with a new state-of-the-art high speed wallboard line.

- Provide continued employment for people in a sparsely populated County where industrial jobs are limited.

Water Supply

- Obtain an adequate water supply for operations.
- Potentially replace an old and leaky pipeline.
- Increase water usage to up to 767 acre-feet annually.

Quarry

- Secure permits and approvals on the Quarry containing high quality gypsum resources.
- Provide for an annual production level of 1.92 million tons per year (TPY).
- Maximize recovery of known gypsum reserves needed for the Plant to fulfill its estimated operational design life.
- Develop Quarry operations to limit disturbed areas.
- Implement a reclamation plan designed to minimize erosion, reestablish vegetation, reduce aesthetic impacts, and eliminate public safety concerns.
- Reclaim Quarry for post-mining uses including open space.

ES.7 Alternatives Considered

CEQA Guidelines Section 15126.6(c) provides for the selection of a range of reasonable alternatives. The range of potential alternatives to the Proposed Action included those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.

Similarly, NEPA requires that an EIS identify and objectively evaluate a reasonable range of alternatives to a proposed action. Under both CEQA and NEPA, the selection of alternatives for discussion is governed by a “rule of reason.” The following alternatives to the Proposed Action were considered:

No Action Alternative

The No Action Alternative assumes that no element of the Proposed Action would be implemented. Specifically, no expansion/modernization of the Plant or Quarry, and no replacement of the existing water pipeline, would occur.

Partial Use of Water from Imperial Irrigation District

This alternative would supply the Plant with a portion of the water needed for operations from USG's existing wells in Ocotillo. The balance of the water needed for operations would be supplied by the Imperial Irrigation District (IID).

Under this alternative, water from IID would be blended with water from Ocotillo as needed to achieve the level of water quality and consistency necessary for use in manufacturing wallboard without the need for further treatment of the process water. As stated below, the quality of Colorado River water varies over time. Thus, the amount of water that USG would need to extract from the well at Ocotillo would vary over time. However, this alternative assumes that over the life of the Project, the amount of water extracted from the existing wells at Ocotillo would average 400 acre-feet per year (AF/Yr). Water in excess of 400 AF/Yr would be provided by IID under a water service agreement with USG (assuming such a water service agreement can be obtained).

This alternative would entail the construction and operation of a new water pipeline extending from the Westside Main Canal to the Plaster City Plant a distance of approximately 5.5 miles. The likely routes for the pipeline include: (1) along the north or south side of Evan Hewes Highway (S-80), or (2) the north side of the commercial railroad tracks that parallel Evan Hewes Highway.

In addition to the pipeline itself, this alternative would require the construction of a pumping station near the canal, access roads for the pipeline, and water storage facilities at the Plant. Storage and treatment facilities at the Plant would include two settling/storage basins such as 150 foot by 150 foot reservoirs on USG property to settle out silt and solids from the water prior to use. These settling/storage basins with a total capacity of about 1 million gallons would be located adjacent to the USG manufacturing facility on Plant property, most likely south of the Plant. From the settling ponds the water would be pumped to the manufacturing facility, blended with Ocotillo well water to further dilute impurities and used in the manufacturing process.

Under this alternative, once all of the approvals and improvements necessary to convey IID water to the Plant are completed, USG would continue to use water from the existing wells at Ocotillo at pre project levels. Assuming that all necessary approvals can be obtained to implement this alternative (including a service agreement with the IID), the process of obtaining these approvals would likely require a minimum of 1 to 3 years. Additionally, the construction of the pipeline and related improvements would require a minimum of 2 additional years. Thus, for purposes of evaluating the potential

environmental effects of this alternative, it is assumed that IID water would not be available for use at the Plant until at least 2010 or 2012.

Full Use of Water from Imperial Irrigation District

This alternative is similar to the partial use alternative discussed above, except that 100 percent of the water needed for Plant operations would be supplied by IID under a water service agreement with USG. This alternative would entail the construction and operation of a new water pipeline as described above in the Partial Use alternative extending from the Westside Main Canal to the Plant.

Water/settling storage facilities would be larger than that described above under the partial use alternative to provide the Plant with a 7 day on-site storage in the event of water delivery interruptions. Under this alternative, it is anticipated that there would be two settling/storage reservoirs, each would be about 225 feet by 225 feet. The storage capacity of each reservoir would be about 4.5 million gallons. Settling ponds would be utilized to settle solids out of the water and sized to store a 7 day supply of water for Plant operations. Water would also need to be filtered and treated to provide the Plant with potable water.

The quality of Colorado River water varies significantly over time. This variation in salinity creates a problem in the process of making wallboard. While a range of salinity can be managed by changing formulations to account for salinity changes, this cannot be accomplished quickly. In other words, the water used to manufacture wallboard must be maintained with a constant salinity or solids. In short, USG would need to treat Colorado River water not only if salinity levels are high, but simply because the levels vary. At times when the salinity levels are relatively low, it may be possible to use Colorado River water to manufacture wallboard in both the existing No. 1 board line and the new high speed No. 3 board line without further treatment. However, when salinity levels are relatively high, the water would not be suitable for use in the manufacture of wallboard unless it is first treated by Reverse Osmosis (RO). The treatment process would require the construction of a desalinization facility, along with wastewater treatment facilities to handle the wastewater from the RO process. It is assumed that the RO units could be limited to about one quarter of the flow and that the treated water would be blended with settled canal water to reach the acceptable levels of purity. For example, if the supply from IID were to be 866 AF/Yr it would be necessary to take in about 266 AF to the RO plant to produce 200 AF/Yr of low salinity water. This water would be blended with about 600 AF/Yr of settled canal water to

produce water acceptable for board manufacture. The waste stream would be 66 AF/Yr, which would require on-site evaporation ponds of about 11 acres.

In addition to the RO unit, a treatment facility would be needed to supply potable water for the Plant. While the quantity of water needed for this purpose is relatively small, the unit would require attention and service. The Plant would also be required to isolate the potable system from the industrial use supply system.

ES.8 Summary of Impacts and Mitigation Measures

The impacts of the proposed Project, proposed mitigation, and significance conclusions are discussed in detail in the Draft EIR/EIS, as revised in this document. Table ES-1 summarizes the revised impacts, mitigation measures, and levels of significance identified in this document (strike out and underlined).

**Table ES-1
Summary of Revised Potential Impacts and Mitigation Measures**

Potential Impact	LOS Before Mit	Mitigation Measures	LOS After Mit
Hydrology and Water Quality			
Increased pumping of USG wells could reduce water levels, increasing the cost of pumping groundwater and, causing some wells to go dry.	S	<p>Mitigation Measure 3.3-1: If the water level in a <u>an existing</u> well in the Ocotillo area decreases at a rate faster than one foot every eight years and the average water levels in the surrounding wells also decrease for more than two years in a row due to the Proposed Action, as measured from the interpolated linear of one foot every eight years with a starting reference point being the date that pumping by USG increases above the baseline rate, and there is a documented reduction in the available water to the affected user, then USG, at its election will:</p> <ol style="list-style-type: none"> 1. Rehabilitate the well and/or install a new pump to restore the prior pumping rate; or 2. Provide an incremental replacement of water equivalent to the amount of the reduced rate of pumping by the affected party, of a like quantity and quality, and provide reimbursement for the incremental increase for the affected party to pump the remaining available groundwater; or 4. Provide a full replacement water supply to the affected party of a like kind and quality, at a cost that does not exceed the cost to the affected party at the time the impact occurred; or 3. Deepen the existing well or provide a new replacement well to the affected party, drilled to a depth that will not be affected by existing or future Project-related declines in the water table, and capable of providing an equivalent quantity and quality of water that existed prior to the impact, and provide reimbursement for incremental increase in cost for the affected party to pump the available water. 	LS

Potential Impact	LOS Before Mit	Mitigation Measures	LOS After Mit
		<p>The extent to which the Proposed Action will be as contributing to cause the decrease in water levels in the Ocotillo area will be determined only after a review of the water level data and a decision by the Imperial County Planning Commission.</p> <p>The baseline condition in the Basin includes a declining water table, and existing data suggests that water levels recover slowly after significant drawdown occurs. Therefore, if USG elects to provide replacement water or a replacement water supply, arrangements must be made to provide this mitigation until groundwater levels stabilize at return to a level equal to the projected baseline condition or ten years after USG reduces its pumping from the Basin to the baseline rate, whichever first occurs.</p>	
<p>Increased pumping from USG wells could degrade water quality in individual wells due to lateral migration of higher-TDS water located to the east of Coyote Wells, lateral migration of higher-TDS water from areas near outcrops of Tertiary sediments, or vertical migration of water from or near Tertiary sediments underlying the alluvial aquifer throughout most areas of the basin.</p>	S	<p>Mitigation Measure 3.3-2: USG will provide an alternative or replacement source of water if the water quality significantly deteriorates in any <u>existing</u> well in the Ocotillo area and such deterioration is caused by the Proposed Action. As discussed above, the secondary drinking water standard for TDS is 500 mg/L and water with a TDS level in excess of 1,000 mg/L is considered non-potable. Therefore, if the <u>Proposed Action causes the</u> TDS level in any <u>existing well to</u> exceed 500 mg/L, or <u>causes</u> the concentration of any other measured parameter sulfate, chloride or boron, as described in the <u>Mitigation Groundwater</u> Monitoring Program below, to exceeds the drinking-water standard that is in force at the time of the measurement, <u>the Proposed Action is approved,</u> then USG will provide the affected party or parties with an alternative supply of water for drinking and cooking, at no cost to the affected party or parties. This alternative supply could be bottled water or a hookup to a replacement water source. If the TDS level in any well exceeds 1,000 mg/L and is caused by the Proposed Action, then the water quality will be such that use of the water for any domestic purpose will be significantly affected due to scale buildup, damage to plumbing, corrosion, and other similar impacts. If the TDS level exceeds 1,000 mg/L and is caused by the Proposed Action, USG will provide the affected party or parties with a hookup to a replacement supply of water. This replacement supply may be a hookup to an existing municipal district or other appropriate drinking water supply system. USG will bear the full cost of the hookup. The affected party or parties, however, would only be responsible for the annual cost of the replacement water equivalent to their costs to pump water prior to the occurrence of the impact. If the annual cost of water for the replacement supply exceeds the affected party or parties costs to pump water prior to the occurrence of the impact, USG will pay the incremental difference.</p> <p>The extent to which the Proposed Action will be considered as contributing to be the cause of the decrease in water quality in the Ocotillo area, will be determined only after a review of the water quality data and a decision by the Imperial County Planning Commission.</p>	LS

Potential Impact	LOS Before Mit	Mitigation Measures	LOS After Mit
		<p>The existing data from Ocotillo and Yuha Estates indicates that, once the water quality decreases, it may take many decades for the water quality to recover once the pumping causing the impact has ceased. Therefore, If USG will need is required to provide the alternative and/or replacement water supply pursuant to the terms of this mitigation measure, it must continue to do so until (1) concentrations of the above-listed constituents in excess of applicable water-quality standards return to levels below such standards or until the water quality parameters, for which there is data that currently exists, return to pre-Proposed Action levels, (2) ten years after USG reduces its pumping from the Ocotillo/Coyote Wells Groundwater Basin to the baseline rate, whichever first occurs.</p>	
<p>Increased pumping from USG wells could degrade water quality in the groundwater Basin due to lateral migration of higher-TDS water located to the east of Coyote Wells, lateral migration of higher-TDS water from areas near outcrops of Tertiary marine sediments, or vertical migration of water from or near Tertiary marine sediments underlying the alluvial aquifer throughout most areas of the basin.</p>	S	<p>As part of the Proposed Project, USG will implement the Groundwater Monitoring Program described below. The data from the groundwater monitoring program will provide an indication of a trend of progressively decreasing information concerning water quality in individual wells and throughout the basin, if such a trend occurs and is a result of the increased pumping for the Proposed Project. If such a trend is identified the data indicates a trend of progressively decreasing water quality in only a few wells in close proximity to the USG pumping wells, and an impact subsequently occurs in any or all of those few wells, then USG can mitigate the impacts in the individual wells as discussed above for Impact 3.3-2A: Water Quality Degradation at Plant Affecting Individual Well Owners. If, however, such a trend is identified in a larger number of wells, and these wells are located over a broader area of the basin and not just in the area of the USG pumping wells, it would not be possible to restore the Basin-wide water quality once it is degraded to concentrations at which the groundwater is no longer suitable for its current uses. There is insufficient recharge to restore the Basin and dilute the salts in the saline water. Therefore, it is not possible to mitigate the Basin-wide degradation of water quality. If such trends are detected by the Groundwater Monitoring Program, the only way to halt or reverse these trends would be to curtail pumping by reducing production at the Plant, or by implementing one or more Alternatives that reduce or eliminate withdrawals from the basin, prior to the groundwater quality being degraded to the point where it was no longer suitable for its current uses.</p>	S
Wildlife			
<p>Increased activity at the Quarry could disturb additional desert upland and wash habitats possibly having a negative impact on wildlife in the area.</p>	S	<p>Mitigation Measure 3.5-1d: Peninsular bighorn sheep: USG, in coordination with the BLM, shall initiate formal consultation with the US Fish and Wildlife Service under Section 7 of the Federal Endangered Species Act and implement the terms and conditions of the incidental take statement authorizing the project. The consultation process will result in the development of a Biological Opinion by the USFWS that will: (1) provide a statement about whether the proposed project is “likely or not likely to jeopardize” the continued existence of the species, or result in the adverse modification of critical habitat; (2)</p>	LS

Potential Impact	LOS Before Mit	Mitigation Measures	LOS After Mit
		<p>provide an incidental take statement that authorizes the project; and (3) identifies mandatory reasonable and prudent measures to minimize incidental take, along with terms and conditions that implement them.</p> <p><u>Mining shall be conducted only as approved in the Plan of Operation and the Mine Reclamation Plan. Reclamation shall be conducted concurrently with mining and it shall be initiated within each phase as soon as is feasible. Reclamation shall include slope contouring and revegetation with native plant species as specified in the Reclamation Plan.</u></p> <p><u>USG shall instruct its employees and other visitors to the mine to avoid peninsular bighorn sheep. Access to undisturbed lands by humans on foot shall be restricted, and usually would include only biologists and mining personnel. USG shall establish a training program, including new-employee orientation and annual refresher, to educate employees regarding bighorn sheep and the importance of avoidance.</u></p> <p><u>USG shall not allow domestic animals (cattle, sheep, donkeys, dogs, etc.) onto the mine site or any lands under USG control. Training for mine employees shall include instructions to report observations of domestic animals to the quarry's environmental manager. Upon receiving any such reports, the environmental manager shall contact the appropriate authorities for removal of domestic animals.</u></p>	
Cultural Resources			
The Proposed Action may affect unique prehistoric sites or artifacts in the potential impact area.	LS	<p>None required. If any archaeological resources are encountered during implementation of the Proposed Action, construction or any other activity that may disturb or damage such resources shall be halted, and the services of a qualified archaeologist shall be secured to assess the resources and evaluate the potential impact. Such construction or other activity may resume only after the archaeological resources have been assessed and evaluated and a plan to avoid or mitigate any potential impacts to a level of insignificance has been prepared and implemented.</p>	
The Proposed Action may affect historic sites or artifacts in the potential impact area.	S	<p>If any archaeological resources are encountered during implementation of the Proposed Action, construction or any other activity that may disturb or damage such resources shall be halted, and the services of a qualified archaeologist shall be secured to assess the resources and evaluate the potential impact. Such construction or other activity may resume only after the archaeological resources have been assessed and evaluated and a plan to avoid or mitigate any potential impacts to a level of insignificance has been prepared and implemented. An archaeologist qualified by the Society of Professional Archaeologists (SOPA) shall be deemed "qualified" for purposes of this mitigation measure. The services of a qualified archaeologist may be secured by contacting the Center for Public Archaeology — California State University, Fullerton or a member of SOPA.</p>	

Potential Impact	LOS Before Mit	Mitigation Measures	LOS After Mit
<u>Global Warming</u>			
<u>The proposed project will result in cumulative impacts to climate change.</u>	<u>S</u>	<u>USG has already acquired approximately \$1.6 million in emission credits for the Project to meet applicable air quality standards. Similarly, to the extent necessary, USG will acquire recognized carbon credits to offset the Project's increased GHG emissions.</u>	<u>LS</u>
LOS = Level of Significance S = Significant or Potentially Significant LS = Less than Significant			

1.0 Introduction

1.1 PURPOSE

This Final Environmental Impact Report/Environmental Impact Statement (Final EIR/EIS) has been prepared to describe the disposition of environmental issues raised in the comments received on the Draft EIR for the United States Gypsum Company (USG) Expansion/Modernization Project (U.S. Gypsum Project). The evaluation and response to public comments is an essential part of the full disclosure environmental review process for the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) and has been completed in accordance with California Public Resources Code Section 21000 *et seq.*, and 42 U.S.C. §4321 *et seq.*

1.2 FINAL EIR/EIS REQUIREMENTS

The Final EIR/EIS for the U.S. Gypsum Project has been prepared to provide responses to comments received. The response to comments may take the form of a revision to the Draft EIR or may be a separate section in the final document. In this case the Final EIR/EIS includes both.

The CEQA Guidelines (14 CCR Section 15132) require that the Final EIR/EIS shall consist of:

- The Draft EIR/EIS or a revision of the draft;
- Comments and recommendations received on the Draft EIR/EIS either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft EIR/EIS;
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

This Final EIR/EIS has been prepared in a format in accordance with CEQA Regulations (40 CFR 1503.4(c)). This document should be used in conjunction with, rather than in place of, the Draft EIR/EIS. Therefore, this document, together with the Draft EIR/EIS,

fulfills State and County CEQA requirements for a complete Final EIR and Federal NEPA requirements for a Final EIS.

1.3 USE OF FINAL EIR/EIS IN DECISION-MAKING PROCESS

The EIR/EIS is an informational document designed to inform the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

The final processes for completion of CEQA and NEPA are described separately below:

CEQA

The County of Imperial (County) is the CEQA Lead Agency. To certify the Final EIR/EIS, the County must find that:

- the Final EIR/EIS has been completed in compliance with CEQA; and
- the Final EIR/EIS was presented to the decision-making body of the lead agency, and the decision-making body considered and reviewed the information contained in the Final EIR/EIS prior to approving the project; and
- the Final EIR/EIS reflects the lead agency's independent judgment and analysis (State CEQA Guidelines, Section 15090).

After the County certifies the Final EIR/EIS, the County may decide whether and how to approve the Project and must adopt findings of fact regarding the significant effects identified in the Final EIR/EIS (State CEQA Guidelines, Sections 15091-15093).

NEPA

The Bureau of Land Management (BLM) is the NEPA Lead Agency. The Final EIR/EIS will be filed with the U.S. Environmental Protection Agency (EPA), and the Notice of Availability (NOA) will be published in the Federal Register announcing the availability of the Final EIR/EIS. After a minimum 30-day waiting period, BLM will issue a Record of Decision (ROD) stating the decision and describing the alternatives considered; the environmentally preferred alternative; the factors considered with respect to the alternatives, environmental commitments, and mitigation measures to be applied to the action; any monitoring and enforcement program to be established; any significant comments received on the Final EIR/EIS; and responses to those comments.

The Final EIR/EIS will be used by the County and the BLM together with economic, social, and technical information, to decide on the discretionary entitlements requested. This Final EIR/EIS is being made available prior to hearings on project approval or denial to provide an opportunity for agency and public review of the complete Final EIR before decisions are made.

Mining activities on private land are regulated by the County in accordance with the Imperial County General Plan and other requirements. The County reviews proposed mining use permits and reclamation plans prior to considering approval of a project. The County is responsible for regulating the reclamation of mining operations, in accordance with the California Surface Mining and Reclamation Act of 1975 (SMARA) (California Public Resources Code Section 2710 *et seq.*).

Mining activities on federal lands are regulated under the Federal Land, Policy and Management Act (FLPMA), and in the California desert, subject to the California Desert Conservation Area (CDCA) Plan. In order to avoid duplication of effort, approval of a mining reclamation plan subject to SMARA is the responsibility of the County, subject to a Memorandum of Understanding between the BLM and the Department of Conservation.

The Project Application for a Plan of Operations and Mine and Reclamation Plan and related technical documents that were, in part, used in the preparation of the Draft EIR/EIS, and this Final EIR/EIS, were submitted by the Applicant to the County in 2003 and 2004. The Application and supporting documents are on file and available for public review at the Imperial County Planning Department. This Final EIR/EIS reviews the environmental consequences of the proposed activities on the Project sites, as described in the Application.

Upon review of the Final EIR/EIS, and prior to rendering decisions on the discretionary actions, the County must certify that:

- The Final EIR/EIS has been completed in compliance with CEQA;
- The Final EIR/EIS was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information contained in the Final EIR/EIS prior to approving the Project; and
- The Final EIR/EIS reflects the Lead Agency's independent judgment and analysis.

Should applicable permits and Reclamation Plan approvals be granted by the County, a statement of findings would be made for each significant environmental effect of the Project, accompanied by a brief explanation of the rationale for each finding. Possible findings are that:

- Changes or alterations have been required in, or incorporated into, the Project to avoid or substantially lessen the significant environmental effects as identified in the Final EIR/EIS;
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency; and/or
- Specific economic, social, or other considerations make infeasible the mitigation measures or Project alternatives identified in the Final EIR/EIS.

In addition, the County would have to make a statement of overriding considerations if, in choosing to grant the Reclamation Plan and other approvals for the Project, it determines that significant environmental impacts remain. The statement of overriding considerations would set forth the specific reasons why the benefits of the Project outweigh the unavoidable significant environmental impacts. The statement of overriding considerations (if any) and the findings will be issued by the Imperial County Planning Commission concurrently with its decision at a public hearing.

At the time of its decision, the BLM will prepare a concise public ROD in accordance with the Council on Environmental Quality (CEQ) regulations at 40 CFR 1505.2. The record as appropriate, will:

- State the decision.
- Identify all alternatives considered by the agency in reaching its decision, specifying the alternative or alternatives that were considered to be environmentally preferable.
- Identify and discuss relevant factors, including economic and technical considerations, agency statutory missions, and considerations of national policy that were balanced by the agency in making its decision.
- State whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and if not, why they were not.
- Adopt a mitigation monitoring and enforcement program.

The ROD for the U.S. Gypsum Project will be issued by the BLM at least 30 days following publication of the Final EIR/EIS NOA in the Federal Register.

2.0 Public Review and Consultation Process

2.1 CIRCULATION OF DRAFT EIR/EIS

2.1.1 Purposes of Public Review

CEQA views public participation as an essential part of the environmental impact evaluation process. The purposes of public circulation and review of EIRs include:

- Sharing expertise;
- Disclosing agency analyses;
- Checking for accuracy;
- Detecting omissions;
- Discovering public concerns; and
- Soliciting counter proposals.

CEQA explains that the focus of the review should be on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project may be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. Reviewers should therefore explain the basis for their comments, and whenever possible should submit data or references in support of their comments (CEQA Guidelines, Section 15204).

CEQA (Cal. Pub. Res. Code Section 21082.2(b)) explains that, “Statements in an environmental impact report and comments with respect to an environmental impact report shall not be determinative of whether the project may have a significant effect on the environment.” According to CEQA, it is the responsibility of the decision makers of the Lead Agency to “determine whether a project may have a significant effect on the environment based on substantial evidence in the record.” “Substantial evidence” is defined as facts, fact-related reasonable assumptions, and expert opinion. Substantial evidence does not include arguments, speculation, unsubstantiated opinion or narrative, clearly erroneous evidence, or socioeconomic impacts not related to the

physical environment (Cal. Pub. Res. Code Section 21080(e), 21082.2(a), 21082.2(c), and Guidelines Section 15384).

2.1.2 Public Review Period and Notifications

In accordance with both the specific requirements and the intent of CEQA, the environmental review process for the U.S. Gypsum Project has included substantial opportunities for public and agency review and comment on the environmental evaluations. This extensive public review process is briefly summarized in the following paragraph.

The Draft EIR/EIS process included the following:

- An EIR/EIS Notice of Preparation (NOP) was distributed to the State Clearinghouse, responsible agencies, interested groups and individuals, and surrounding property owners for a 30-day comment period;
- Two Public Scoping Meetings were held;
- The Draft EIR/EIS was circulated for review;
- Copies of the Draft EIR/EIS were sent directly to responsible, trustee, and other State, Federal, and local agencies expected to have expertise or interest in the resources that may be affected by the proposed Project;
- In addition, copies were sent to organizations, businesses, and individuals with special expertise on environmental impacts and/or who had expressed an interest in this particular project, or other activities; and
- The Notice of Completion was filed with the State Clearinghouse.
- The comment period was extended by the County and BLM to July 17, 2006.

Notice of the availability of this Final EIR/EIS has been provided to agencies, organizations, and the public, who have expressed an interest in the project.

2.2 PUBLIC INPUT ANALYSIS

As a result of the degree of public interest in the Project, a substantial number of comments were submitted during the public review period. Approximately 557 comment letters were submitted. In addition, commenters presented verbal comments at the scoping meeting. Written comments (received as letter correspondence) are contained in Section 5.0, Response to Comments, of this Final EIR/EIS.

The public comments received did not change the analyses or conclusions regarding environmental impacts of the Project presented in the Draft EIR/EIS. Instead, the input

resulted in the adoption of some modification of mitigation measures described in the Draft EIR/EIS. These modified mitigation measures, along with other corrections to the Draft EIR/EIS, are included in Section 3.0, Draft EIR/EIS Errata, as well as being included in the appropriate comment responses in Section 5.0, Response to Comments.

As is common with Draft EIR/EIS circulation and review, many of the comments submitted were general in nature, and asked questions already answered in the Draft EIR/EIS evaluations. Other commenters asked for clarification on points addressed in the environmental evaluations, while some provided suggestions on the evaluation of impacts and determination of specific mitigation measures.

Comments received indicated that some reviewers disagree with the Draft EIR/EIS conclusions. Where specific points of disagreement were expressed by commenters concerning environmental issues, detailed responses have been prepared in this document.

2.3 APPROACH TO RESPONSES

2.3.1 General Issue Comments

The majority of submitted comments were general in nature and expressed concern regarding traffic, hydrology, air quality, and noise, as well as the potential effects on area roads and the compatibility of the Project with agricultural use and biological concerns. Few of these commenters asked questions that had not already been evaluated in the Draft EIR/EIS. Most of these general concerns were voiced in conjunction with opinions on project approval/denial. These concerns were anticipated, as these are the same issues that have been the focus of public interest since the initial public scoping process. Clarification on the environmental evaluations and recommendations in the Draft EIR/EIS is provided. Individual responses are in Section 5.0. They are also cross referenced to specific collective responses in Section 4.0 for clarification and consistency.

2.3.2 Specific Comments

The Draft EIR/EIS was circulated to numerous agencies, many having jurisdiction over natural resources that could be affected by the proposed Project, or having expertise or interest in environmental resources. In addition, interested organizations, individuals, and businesses received the documents or were noticed of their availability. A number of agencies, organizations, businesses, and individuals submitted specific comments or opinions based on review of the Draft EIR/EIS. The majority of these comments requested clarification on specific points addressed, while some provided suggestions on the evaluation of impacts and determination of specific mitigation measures. Replies

to comments from agencies, businesses, individuals, and organizations are provided in Section 5.0. Comments received are organized and numbered in their chronological order of submittal and are listed in Table 5.0-1. Table 5.0-2 is a list of private citizen comments and a copy of the standard form letter. A general response was prepared and is referenced for each of those submitted. In many cases other letters were so similar in content that the reader is referred to the form letter response. These individual letters and responses follow Table 5.0-2.

2.3.3 List of Commenters and Index to Responses

A list of issues raised in the comment letters and public hearings is compiled in Table 2.0-1, Index to Information Regarding Issues Raised in the Draft EIR/EIS. Since most of the comments raised are issues that had already been addressed in the Draft EIR/EIS, the table indicates where in that draft commenters may find the evaluation.

Table 2.0-2, List of Commenters and Index to Responses, is a list of each commenting agency, organization, business, and individual. The list indicates the commenter, a reference to Table 2.0-1 where the requested information can be found and the identification number designated to the letter. Since many of the comments were general in nature, they were expanded on and referenced in Section 4.0, Collective Responses. Where specific comments were submitted and required a detailed response, the commenter is referred to the Sections of this Final EIR/EIS containing the response. Where commenters raised issues that have been previously addressed in the Draft EIR/EIS, they are referred to Table 2.0-1 for the location of that information.

**Table 2.0-1
Index to Information Regarding Issues Raised¹**

Issue/Topic	Draft EIR/EIS
1. ADMINISTRATIVE	
a. EIR Adequacy/ Requirements	1.1.1, 1.1.2
b. Other Documents/ Information	1.1.3.1, 2.4.4.3
c. Applicable Laws	1.1.1
d. Need for the Project	1.2.1, 1.2.2, 1.2.3
e. Socioeconomics	
2. ACOUSTICS/NOISE	
a. Noise Pollution at Quarry and Plant Sites	3.12.3.1, 3.12.3.2, 3.12.3.3, 3.12.3.4
b. Noise Pollution at Plant Site	3.12.3.1
c. Noise Pollution Along Railroad Right-of-Way	3.12.3.2, 3.12.3.3, 3.12.3.4
3. AIR QUALITY	
a. Increased PM ₁₀ and/or Dust Emissions at Quarry	3.6.3.2, 3.6.3.3, 3.6.3.4, 3.6.3.5
b. Increased Exhaust Emissions at Quarry	3.6.3.2, 3.6.3.3, 3.6.3.4, 3.6.3.5
c. Increased PM ₁₀ and/or Dust Emissions at Well Site and Pipeline	3.6.3.2, 3.6.3.3, 3.6.3.4, 3.6.3.5
d. Increased Combustion Emissions at Plant	3.6.3.2, 3.6.3.3, 3.6.3.4, 3.6.3.5
e. Increased PM ₁₀ and/or Dust Emissions at Plant	3.6.3.2, 3.6.3.3, 3.6.3.4, 3.6.3.5
f. Increased PM ₁₀ and/or Dust Emissions at 10" Replacement Pipeline	3.6.3.2, 3.6.3.3, 3.6.3.4, 3.6.3.5
g. Increased Exhaust Emissions Along Railroad Right-of-Way	3.6.3.2, 3.6.3.3, 3.6.3.4, 3.6.3.5
4. APPROVAL AND DENIAL	
a. Approval and Denial	
5. CULTURAL RESOURCES	
a. Prehistoric Cultural Resources	3.8.3.3, 3.8.3.4, 3.8.3.5, 3.8.3.6
b. Ethnic Cultural Resources	3.8.3.3, 3.8.3.4, 3.8.3.5, 3.8.3.6
c. Historic Cultural Resources	3.8.3.3, 3.8.3.4, 3.8.3.5, 3.8.3.6
6. CUMULATIVE IMPACTS	
7. GEOLOGY	
a. Quarry Slope Stability	3.2.3.2, 3.2.3.3, 3.2.3.4, 3.2.3.5
b. Loss of Paleontological Resources	3.2.3.2, 3.2.3.3, 3.2.3.4, 3.2.3.5
8. HAZARDS AND HAZARDOUS MATERIALS	
a. Groundwater Contamination Hazards at Plant and Quarry	3.10.3.2, 3.10.3.3, 3.10.3.4, 3.10.3.5
b. Explosive Hazards at Quarry	3.10.3.2, 3.10.3.3, 3.10.3.4, 3.10.3.5
c. Asbestos Exposure from 8" Pipeline	3.10.3.2, 3.10.3.3, 3.10.3.4, 3.10.3.5
9. HYDROLOGY AND WATER QUALITY	
a. Water Depletion at Plant Affecting Individual Well Owners	3.3.3.7, 3.3.3.8, 3.3.3.9, 3.3.3.10
b. Water Depletion at Plant Affecting the Groundwater Basin	3.3.3.7, 3.3.3.8, 3.3.3.9, 3.3.3.10

¹ Table 2.0-1 identifies each topic raised in comments submitted on the Draft EIR/EIS. For each topic, the chapter/section of the Draft EIR/EIS containing the appropriate information is indicated.

Issue/Topic	Draft EIR/EIS
c. Water Quality Degradation at Plant Affecting Individual Well Owners	3.3.3.7, 3.3.3.8, 3.3.3.9, 3.3.3.10
d. Water Quality Degradation at Plant Affecting the Groundwater Basin	3.3.3.7, 3.3.3.8, 3.3.3.9, 3.3.3.10
e. Water Depletion at Quarry	3.3.5.2, 3.3.5.3, 3.3.3.4, 3.3.3.5
f. Water Quality Degradation at Quarry	3.3.5.2, 3.3.5.3, 3.3.3.4, 3.3.3.5
g. Surface Water Flow at Quarry	3.3.5.2, 3.3.5.3, 3.3.3.4, 3.3.3.5
h. Cumulative Reduced Water Levels	3.3.6
i. Cumulative Water Quality Degradation	3.3.6
10. LAND USE AND PLANNING	
a. Compatibility with Existing Land Uses	3.9.3.2, 3.9.3.4, 3.9.3.5
b. Compatibility with Adopted Land Use Plans	3.9.3.2, 3.9.3.4, 3.9.3.5
11. OPERATIONAL CONSIDERATIONS	
12. PUBLIC HEALTH AND SAFETY	
a. Industrial Facility Safety	3.13.3.2, 3.13.3.3, 3.13.3.4, 3.13.3.5
b. Reclaimed Quarry Site Safety	3.13.3.2, 3.13.3.3, 3.13.3.4, 3.13.3.5
c. Health and Safety Impacts to the Public and Plant Employees	3.13.3.2, 3.13.3.3, 3.13.3.4, 3.13.3.5
13. RECLAMATION	
14. TRAFFIC AND CIRCULATION	
a. Truck Traffic Increases	3.11.3.2, 3.11.3.3, 3.11.3.4, 3.11.3.5
15. VEGETATION	
a. Loss of Vegetation at Quarry	3.4.3.2, 3.4.3.3, 3.4.3.4, 3.4.3.5
b. Loss of Vegetation at Well Site and Pipeline	3.4.3.2, 3.4.3.3, 3.4.3.4, 3.4.3.5
c. Loss of Vegetation at Plant	3.4.3.2, 3.4.3.3, 3.4.3.4, 3.4.3.5
d. Loss of Vegetation at 10" Replacement Pipeline	3.4.3.2, 3.4.3.3, 3.4.3.4, 3.4.3.5
16. VISUAL RESOURCES	
a. Aesthetic Degradation from Quarry Lighting and Glare	3.7.3.3, 3.7.3.4, 3.7.3.5, 3.7.3.6
b. Temporary and Permanent Aesthetic Degradation	3.7.3.3, 3.7.3.4, 3.7.3.5, 3.7.3.6
c. Aesthetic Degradation at Wallboard Storage Pile	3.7.3.3, 3.7.3.4, 3.7.3.5, 3.7.3.6
17. WILDLIFE	
a. Loss of Wildlife at Quarry	3.5.3.2, 3.5.3.3, 3.5.3.4, 3.5.3.5
b. Loss of Wildlife at Well Site and Pipeline	3.5.3.2, 3.5.3.3, 3.5.3.4, 3.5.3.5
c. Loss of Wildlife at Plant	3.5.3.2, 3.5.3.3, 3.5.3.4, 3.5.3.5
d. Loss of Wildlife at 10" Replacement Pipeline	3.5.3.2, 3.5.3.3, 3.5.3.4, 3.5.3.5
e. Loss of Wildlife Along Railroad Right-of-Way	3.5.3.2, 3.5.3.3, 3.5.3.4, 3.5.3.5

**Table 2.0-2
List of Commenters and Index to Responses**

Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
A. AGENCIES		
1. Imperial County Air Pollution Control District (June 7, 2006)	--	14
2. California Regional Water Quality Control Board (July 14, 2006) (part of D. Tisdale, Exhibit 4)	9a, 9b, 9c, 9d	28
3. Imperial Irrigation District (May 12, 2006)	9a, 9b, 9e	2
4. State of California, Department of Conservation (July 14, 2006)	7a, 15	24
5. State of California, Department of Parks and Recreation (June 8, 2006)	5c, 7, 7b, 15, 15a, 16b, 17	16
6. State of California, Department of Toxic Substances Control (May 1, 2006)	8, 8c	1
7. State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (May 24, 2006)	--	5
8. State of California, Public Utilities Commission, (May 22, 2006)	12, 14	4
9. United States Department of the Interior (June 8, 2006)	1, 9, 9a, 9c, 18g	15
10. United States Department of the Interior (July 31, 2006)	7, 9, 9a, 9b, 9c, 9d, 18g	31
11. United States Environmental Protection Agency (July 14, 2006)	3a, 3c, 3e, 3f, 9b, 9c, 9e, 9f, 9g, 9h	25
B. ORGANIZATIONS		
1. California Wilderness Coalition (July 9, 2002)	2, 3, 7, 9, 9d, 9f, 13, 15, 17, 18g, 18h	20
2. California Wilderness Coalition (July 17, 2006)		30
3. Center for Biological Diversity (July 9, 2002)	2, 3, 7, 9, 9d, 9f, 13, 15, 17, 18g, 18h	20
4. Center for Biological Diversity (May 16, 2006)	9, 17	3
5. Center for Biological Diversity (July 17, 2006)		30
6. Defenders of Wildlife (July 10, 2002)	3, 9, 17, 18g	21

2.0 Public Review and Consultation Process

Commenter		Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
7.	Desert Protective Council (July 8, 2002)	2, 3, 5, 13, 14, 15, 16a, 17, 18h,	19
8.	Desert Protective Council (July 9, 2002)	2, 3, 7, 9, 9d, 9f, 13, 15, 17, 18g, 18h	20
9.	Desert Protective Council (May 24, 2006)	--	6 and 7
10.	Desert Protective Council (July 17, 2006)	--	30
11.	Sierra Club, San Diego Chapter (July 9, 2002)	2, 3, 7, 9, 9d, 9f, 13, 15, 17, 18g, 18h	20
12.	Sierra Club, San Diego Chapter (July 17, 2006)	9, 9a, 9b, 9c, 9d, 9e, 9f, 9h, 9i, 18g	29
13.	Sierra Club, San Diego Chapter (July 17, 2006 [2])	1, 1a, 1c, 1e, 2, 3, 9, 15, 17, 18b, 18g	30
14.	Southern California Association of Governments (June 8, 2006)	1b	17
C. BUSINESSES			
1.	Bookman-Edmonston (GEI Consultants) (July 11, 2006)	9c, 9i	26
2.	Coyote Valley Mutual Water Company (June 12, 2006)	9b, 9h, 9i	18
3.	United States Gypsum Company (July 14, 2006)	9, 9b, 9d	26
4.	Wiedlin & Associates (July 15, 2006)	9, 18g	27
D. INDIVIDUALS			
1.	Abela, Alice	Form Letter	
2.	Acerro, Theresa	See Response	32
3.	Agee, Jesse	Form Letter	
4.	Allaback, Mark	Form Letter	
5.	Allen, Laura	Form Letter	
6.	Althiser, Kenneth	Form Letter	
7.	Andrews, Alison	Form Letter	
8.	Anshin, Judith	Form Letter	
9.	Armstrong, Marilee	Form Letter	
10.	Bach, Margaret	Form Letter	
11.	Baker, Bryan	See Form Letter Response	
12.	Barber, Janet	Form Letter	
13.	Barber, Jennifer	Form Letter	
14.	Barnes, John	Form Letter	
15.	Barrows, Michael	Form Letter	
16.	Bartl, Alan	Form Letter	
17.	Baumann, Alan & Janet	Form Letter	

2.0 Public Review and Consultation Process

Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
18. Baur, Saskia	Form Letter	
19. Beck, Connie	Form Letter	
20. Beck, Diane	Form Letter	
21. Becker, Sue	Form Letter	
22. Beer, Julie	Form Letter	
23. Behrakis, Deborah	Form Letter	
24. Belt, Annie	Form Letter	
25. Bennett, Edward L. & Mildred J.	Form Letter	
26. Bernardi, Nancy	Form Letter	
27. Berne, David	Form Letter	
28. Berry, Vanessa	Form Letter	
29. Bertles, Martha	Form Letter	
30. Beuchat, Carol	Form Letter	
31. Blumeneau, Audrey	Form Letter	
32. Bogert, Reid	Form Letter	
33. Bolman, Diane	Form Letter	
34. Bolt, Mitchell	Form Letter	
35. Bond, Monica	Form Letter	
36. Bordenave, Michael	Form Letter	
37. Boren, Gary	Form Letter	
38. Bottorff, Ron	Form Letter	
39. Branch, Steve	Form Letter	
40. Breiding, Joan	Form Letter	
41. Brettillo, Joseph	Form Letter	
42. Brink, Kim F.	Form Letter	
43. Brinkerhoff, Aaron	Form Letter	
44. Britton, Kathryn	Form Letter	
45. Brooker, Catherine	Form Letter	
46. Brown, Daniel	Form Letter	
47. Brown, Jim	Form Letter	
48. Brown, Joel	Form Letter	
49. Brown, Michael	Form Letter	
50. Brown, Steve	Form Letter	
51. Brumbaugh, Diana	Form Letter	
52. Brussmann, Peter	Form Letter	
53. Burford, Martha	Form Letter	
54. Burk, Joyce	Form Letter	
55. Burns, Robert	See Response	33
56. Burns, Vicki	Form Letter	
57. Camarena, Megan	Form Letter	
58. Campbell, Alicia	Form Letter	
59. Campbell, Tomas	Form Letter	
60. Campbell, Velene	Form Letter	

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Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
61. Cant, John	Form Letter	
62. Carnahan, Walt	Form Letter	
63. Carroll, Jacqueline	Form Letter	
64. Carroll, Kathryn	Form Letter	
65. Carter, Marian	Form Letter	
66. Cass, Lorraine	Form Letter	
67. Cassidy, Margaret	Form Letter	
68. Caudill, Rich & Maya	Form Letter	
69. Chacalos, Payton	Form Letter	
70. Chapman, Zoe	Form Letter	
71. Chermak, Douglas	Form Letter	
72. Chichlar, Gerald	Form Letter	
73. Chien, Benny	Form Letter	
74. Christiana, Verna	Form Letter	
75. Christianson, Steve	Form Letter	
76. Clark, Jason	Form Letter	
77. Clark, Sally	Form Letter	
78. Close, Dan	See Response	34
79. Cluster, Mike	Form Letter	
80. Cohen, Howard	Form Letter	
81. Comisar, Gerald	Form Letter	
82. Confectioner, Vira	Form Letter	
83. Conly, Leonard	Form Letter	
84. Conroy, Thomas	Form Letter	
85. Cooper, Richard	Form Letter	
86. Costa, Francisco	Form Letter	
87. Cottingham, Brian	Form Letter	
88. Counseller, Erik	Form Letter	
89. Cousins, Catharine	Form Letter	
90. Crawford, David	Form Letter	
91. Cunningham, Debra	Form Letter	
92. Dane, William	Form Letter	
93. Dapore, Wendy	Form Letter	
94. Davidson, Davy	Form Letter	
95. Dayton, RuthAnne	Form Letter	
96. De Costanzo, Danielle	Form Letter	
97. Denneen, Bill	Form Letter	
98. Denison, James	See Form Letter Response	
99. Denison, Joyce (June 6, 2002)	9b, 9d, 9h, 9i, 17	12
100. Denison, Michael (June 1, 2002)	9b, 9d, 9h, 9i, 17	13
101. Denison, Richard (June 6, 2002)	9, 9h, 9i, 15, 17	11
102. Dennis, Larry	Form Letter	
103. Desilets, Michelle	Form Letter	

2.0 Public Review and Consultation Process

Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
104. Dexter, Ken	Form Letter	
105. Diaz, Israel	Form Letter	
106. Diaz, L.	Form Letter	
107. Diaz, Marisa	Form Letter	
108. Dickinson, Rebecca	Form Letter	
109. Doe, Crosby	Form Letter	
110. Doman, Geoffrey	Form Letter	
111. Domingos, Ananda	Form Letter	
112. Doncaster, Jeane J.	Form Letter	
113. Downing, Steve	Form Letter	
114. Duncan, Mike	Form Letter	
115. Duquette, Thomas	Form Letter	
116. Easter, Margaret	Form Letter	
117. Ecoman, Brett	Form Letter	
118. Edwards, Dylan	Form Letter	
119. Eger, Grace	Form Letter	
120. Emerson, Linda	Form Letter	
121. Engle, Ned	No Response Required	
122. English, Roger	Form Letter	
123. Ennis, Karen	Form Letter	
124. Epperson, Diane (May 30, 2006)	9b, 9d	9
125. Erwin, Cherie	Form Letter	
126. Evans, Linda	Form Letter	
127. Evans, James	Form Letter	
128. Fahlgren, Vivian	Form Letter	
129. Falberg, Gregory	Form Letter	
130. Feldman, Mark	Form Letter	
131. Field, Michael	Form Letter	
132. Fiklin, James	Form Letter	
133. Filipelli, DeBorah	Form Letter	
134. Fiore, Mark J.	Form Letter	
135. Fischer, Douglas	Form Letter	
136. Fisk, Linda	Form Letter	
137. Flietner, David	See Response	35
138. Fleming, Alan	Form Letter	
139. Floyd, Kim	Form Letter	
140. Foley, Fran	Form Letter	
141. Ford, Julie C.	Form Letter	
142. Fordice, John	Form Letter	
143. Fortner, Suzanne	Form Letter	
144. Foss, Janice	Form Letter	
145. Foster, Linda	Form Letter	
146. Fowlks, Dan	Form Letter	

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Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
147. Frappier, Alexandra	Form Letter	
148. Frasier, Forest	Form Letter	
149. Freedlund, Ali	Form Letter	
150. Frewin, Terry	Form Letter	
151. Frugoli, Greg	Form Letter	
152. Fullam, Peter	See Form Letter Response	
153. Gagomiros, Keith	Form Letter	
154. Galvin, Peter	Form Letter	
155. Gan, Monica	Form Letter	
156. Garber, Dennis	Form Letter	
157. Garcia, Christine	Form Letter	
158. Gardner, Kyle	Form Letter	
159. Garrels, Sharon	Form Letter	
160. Garrett, Katherine	Form Letter	
161. Garrett, Kelley	Form Letter	
162. Garvin, Michael	Form Letter	
163. Gaul, Ron	See Form Letter Response	
164. Gerratana, Carol	See Form Letter Response	
165. Gibson, James	Form Letter	
166. Gierson, Ellen	Form Letter	
167. Goggins, Alan	Form Letter	
168. Gooch, Nancy	Form Letter	
169. Gottesman, Judith	Form Letter	
170. Gottscho, Andrew	Form Letter	
171. Graham, Kimberley	Form Letter	
172. Grant, Linda	Form Letter	
173. Greenberg, Corinne	Form Letter	
174. Greenblatt, Karl	Form Letter	
175. Gregor, Dorothy	See Form Letter Response	
176. Grenland, Dianne	Form Letter	
177. Griffith, Jeremiah	Form Letter	
178. Grobe, Nicola	Form Letter	
179. Guerreiro, Mike	Form Letter	
180. Hagen, Andrew	Form Letter	
181. Hagler, Douglas	Form Letter	
182. Hall, Robert	Form Letter	
183. Hamilton, Van & Lois	Form Letter	
184. Hampton, Susan	Form Letter	
185. Harkins, Joanne	Form Letter	
186. Harkins, Lynne	See Form Letter Response	
187. Harmon, Ben	Form Letter	
188. Harrington, Sue	Form Letter	
189. Harris, Victoria	Form Letter	

2.0 Public Review and Consultation Process

Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
190. Hartwick, Nancy	Form Letter	
191. Haskins, Bill	Form Letter	
192. Hawthorne, Anne	Form Letter	
193. Hayes, Sara	Form Letter	
194. Healy, Patricia	Form Letter	
195. Hein, Claudia	Form Letter	
196. Heinzig, Dennis	Form Letter	
197. Henry, Lyle	Form Letter	
198. Hensley, Gordon	Form Letter	
199. Hidy, Ross	Form Letter	
200. Hill, Kirsten	Form Letter	
201. Hillery, Karie	Form Letter	
202. Hodges, Herman	Form Letter	
203. Hoffman, Jeff	Form Letter	
204. Hofman, Diana	Form Letter	
205. Holcomb, Susan	Form Letter	
206. Holmes Fatooh, Audrey	See Form Letter Response	
207. Holz, Dennis	Form Letter	
208. Hoon, Daryl	Form Letter	
209. Hopkins, Thomas	Form Letter	
210. Huard, Nicholas	Form Letter	
211. Hubbs, Earl	Form Letter	
212. Huebner, Julie	Form Letter	
213. Hughes, Brendan	Form Letter	
214. Hughes, Nan	Form Letter	
215. Jacobs, David	Form Letter	
216. Jaeger, Diana	Form Letter	
217. Janson-Smith, Toby	Form Letter	
218. Jensen, Nancy	Form Letter	
219. Jessler, Darynne	Form Letter	
220. Johnson, Christina	Form Letter	
221. Johnston, Timothy	Form Letter	
222. Jones, Dayvid	Form Letter	
223. Jones, Kathleen	Form Letter	
224. Junak, Steve	Form Letter	
225. Kahn, Patricia	Form Letter	
226. Kandel, Cheryl	Form Letter	
227. Karlsson, Kent	Form Letter	
228. Karp, Michael	Form Letter	
229. Kaufman, I. Charles	Form Letter	
230. Kaufman, Kimberly	Form Letter	
231. Kaufman, Murray	Form Letter	
232. Kay, Joni	Form Letter	

2.0 Public Review and Consultation Process

Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
233. Kelly, Carol	Form Letter	
234. Kennedy, Arthur	See Form Letter Response	
235. Kiger, Mary Ann	Form Letter	
236. Kimball, Charlotte	Form Letter	
237. Kirk, Keith	Form Letter	
238. Klein, Karin	Form Letter	
239. Klein, Leslie	Form Letter	
240. Klopp, Basey	Form Letter	
241. Klosterman, Peter	Form Letter	
242. Kotte, Merry Brook	Form Letter	
243. Kraemer, Melissa	Form Letter	
244. Krakow, Jessica	Form Letter	
245. Kritzer, Sherry	Form Letter	
246. Kuelper, Carol	Form Letter	
247. Kulenovic, Minka	Form Letter	
248. Kummel, Julie	Form Letter	
249. Kutcher, Celia	See Form Letter Response	
250. Kwan, Mei	Form Letter	
251. Kwinter, Dave	Form Letter	
252. La Brie, Jon	Form Letter	
253. LaBrie, T.M.	Form Letter	
254. Laffey, John Kevin	Form Letter	
255. LaManna, Joseph	Form Letter	
256. Lange, Trent	See Form Letter Response	
257. Lariz, Mondy	Form Letter	
258. Laursen, Patti	Form Letter	
259. Lee, David	Form Letter	
260. Levine, Ross	Form Letter	
261. Lewis, Tryphena	Form Letter	
262. Lieber, Kurt	Form Letter	
263. Lilly, David	Form Letter	
264. Lin, Stephanie	Form Letter	
265. Linarez, Karen	Form Letter	
266. Linder, Lorin	Form Letter	
267. Linsley, Stephen	Form Letter	
268. Little, Eko	Form Letter	
269. Little, James	Form Letter	
270. Litvak, Jay	Form Letter	
271. Litwin, Julie	Form Letter	
272. Logsdon, Jimi	Form Letter	
273. Lotz, Elizabeth	Form Letter	
274. Lowell, Jacquie	Form Letter	
275. Lynch, Dennis	Form Letter	

2.0 Public Review and Consultation Process

Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
276. Lynn, Georgia	Form Letter	
277. Lyons, James	Form Letter	
278. Mack, Callie (July 14, 2006)	3, 9, 9b, 9d, 15, 16, 17	23
279. Mark, Marie	Form Letter	
280. Marshall, Ilona	Form Letter	
281. Marszal, Jeffrey G.	Form Letter	
282. Masarik, Charlotte	Form Letter	
283. Mason, Ken	Form Letter	
284. Matthews, Mark	Form Letter	
285. Maxwell, Jane	See Form Letter Response	
286. Mayer, Norman	Form Letter	
287. McAfee, Stephanie	Form Letter	
288. McClure, Roger & Judith	Form Letter	
289. McGowan, Cathy	Form Letter	
290. McKnight, Shoshanah	Form Letter	
291. McLaughlin, Janet H.	Form Letter	
292. Meier, Robert	Form Letter	
293. Meissner, Gregory	Form Letter	
294. Meril, Rick & Joan	Form Letter	
295. Merilatt, George	Form Letter	
296. Meyers, M.S.	Form Letter	
297. Miller, Jamie	Form Letter	
298. Miller, Laura	Form Letter	
299. Miller, Lee	Form Letter	
300. Miranda, Lara C.	See Response	36
301. Miranda, Luciana	Form Letter	
302. Mitchel, William	Form Letter	
303. Mitchell, Joyce	Form Letter	
304. Montoliu, Raphael	Form Letter	
305. Morris, Peter	Form Letter	
306. Morris, Todd	Form Letter	
307. Morris, Virginia	Form Letter	
308. Morrow, Mr. & Mrs. Jack L.	Form Letter	
309. Moser, Rich	Form Letter	
310. Mount-Sartor, Joanne	Form Letter	
311. Mundy, Kenneth	Form Letter	
312. Munoz, Jeanne	Form Letter	
313. Munson, Jacob	Form Letter	
314. Murphy, J.	See Form Letter Response	
315. Murphy, Virginia G.	Form Letter	
316. Napier, Sabrina	Form Letter	
317. Neuhauser, Alice	Form Letter	
318. Nguyen, Thanh-Lam	Form Letter	

2.0 Public Review and Consultation Process

Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
319. Nicodemus, Sharon	Form Letter	
320. Nogare, John	Form Letter	
321. Nogare, Susan	Form Letter	
322. Novotny, Michael & Sally	Form Letter	
323. O'Donnell, Kelly	Form Letter	
324. Ogella, Edith	Form Letter	
325. Olander, Chris	Form Letter	
326. O'Leary, Cathy	Form Letter	
327. Olin, Christopher	Form Letter	
328. Olin, Milton	Form Letter	
329. Olson, Tarin	Form Letter	
330. Omura, Kathy	Form Letter	
331. Orenstein, Susan E.	Form Letter	
332. O'Shea, Denis (July 11, 2006)	9, 9b	22
333. Painter, Elizabeth	See Form Letter Response	
334. Pan, Pinky Jain	Form Letter	
335. Parker, Angus M.	Form Letter	
336. Parker, Reece	Form Letter	
337. Parker, Ronald C.	Form Letter	
338. Parrish, Larry	Form Letter	
339. Patitz, Tatjana	Form Letter	
340. Patton, Carol	Form Letter	
341. Peer, William	Form Letter	
342. Pellicani, Andrea	Form Letter	
343. Penner, Marsha	See Form Letter Response	
344. Petersen, John	Form Letter	
345. Peterson, Janice	Form Letter	
346. Peterson, Morgan	Form Letter	
347. Pewthers, Cale	Form Letter	
348. Pickering, Steve	Form Letter	
349. Pillsbury, Cheri	See Form Letter Response	
350. Polesky, Alice	Form Letter	
351. Pomies, Jackie	Form Letter	
352. Preston, Mar	Form Letter	
353. Price, Lynn	Form Letter	
354. Prola, Jim & Diana	Form Letter	
355. Proteau, Mary	Form Letter	
356. Pruitt, Richard	Form Letter	
357. Puga, Shirley	Form Letter	
358. Qualls, Mike	Form Letter	
359. Quong, Angela	Form Letter	
360. Rabens, Robin	Form Letter	
361. Ratcliffe, John W. & Joanne E.	Form Letter	

2.0 Public Review and Consultation Process

Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
362. Raya, Art & Sharon	Form Letter	
363. Raymond, MariaElena	See Form Letter Response	
364. Reed, Cynthia	Form Letter	
365. Reed, Kristin	Form Letter	
366. Reed, Robert R.	Form Letter	
367. Reinberg, Don	Form Letter	
368. Remington, Stephanie	Form Letter	
369. Reyes, Fran	Form Letter	
370. Riddell, John	Form Letter	
371. Riley, Bill	Form Letter	
372. Ritter, Amy	Form Letter	
373. Robinson, Debra K.	Form Letter	
374. Robinson, Richard	Form Letter	
375. Robison, Anne	Form Letter	
376. Rocco, David	Form Letter	
377. Rochford, Dan	Form Letter	
378. Rojas, Teresa	Form Letter	
379. Root, Charlene	Form Letter	
380. Roper, Erik	Form Letter	
381. Rose, Barbara R.	Form Letter	
382. Rosen, Z'ava	Form Letter	
383. Rousselot, Patrik	Form Letter	
384. Ruane, Catherine	Form Letter	
385. Rubin, Gene & Lorraine	Form Letter	
386. Rubin, Michael	Form Letter	
387. Russell, James	Form Letter	
388. Russell, Phyllis	Form Letter	
389. Sacco, Thomas	Form Letter	
390. Sahagun-Norte, Yolanda M.	Form Letter	
391. Salzman, Richard	Form Letter	
392. Saufley, Harold	Form Letter	
393. Saverio, R.	Form Letter	
394. Schlecker, Rose	Form Letter	
395. Schlegel, Ed	Form Letter	
396. Schleimer, Sylvia	Form Letter	
397. Schmitt, Richard	Form Letter	
398. Schneider, Anna	Form Letter	
399. Scholl, Florence	Form Letter	
400. Schuett, Greg	Form Letter	
401. Schulte, Dawne	Form Letter	
402. Schwick, Keplin	Form Letter	
403. Scott, Joan	Form Letter	
404. Scully, Patricia	Form Letter	

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Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
405. Senour, Jon C.	Form Letter	
406. Shapira, Susan	Form Letter	
407. Shapiro, Susan	Form Letter	
408. Shemwell, Misty	Form Letter	
409. Sheppard, Jacob	Form Letter	
410. Shields, Kelli	Form Letter	
411. Siegel, Kassie	Form Letter	
412. Silan, Sheila	Form Letter	
413. Silver, Jack	Form Letter	
414. Simon, Philip	Form Letter	
415. Simons, Anita	Form Letter	
416. Smallwood, Spencer	Form Letter	
417. Smith, Adam	Form Letter	
418. Smith, Brian	Form Letter	
419. Smith, Dmitra	Form Letter	
420. Snyder, Renee	Form Letter	
421. Sondrini, Dennis O.	Form Letter	
422. Sonoda, Charlotte	Form Letter	
423. Sonoquie, Mo	Form Letter	
424. Sorenson, John F.	Form Letter	
425. Spenger, Constance	Form Letter	
426. Stadler, Scott	Form Letter	
427. Starks, Les	Form Letter	
428. Stearns, Geoffrey	Form Letter	
429. Steele, Mary	Form Letter	
430. Steinbach, Ann	See Form Letter Response	
431. Steiner, John	Form Letter	
432. Stephens, Josh	Form Letter	
433. Sternberg, Justin	Form Letter	
434. Stevens, Thomas N.	Form Letter	
435. Stewart, Dana L.	Form Letter	
436. Stewart, Glenn R.	See Form Letter Response	
437. Stillman, Jon	Form Letter	
438. Stoilov, Luben	Form Letter	
439. Stovin, Ed	See Response	37
440. Stowe, David	Form Letter	
441. Strauss, Howard	Form Letter	
442. Strickler, Jean	Form Letter	
443. Stringer, Lewis	Form Letter	
444. Strobel, Jeanine	Form Letter	
445. Stromberg, Mark	Form Letter	
446. Stuckey, Marci	Form Letter	
447. Suzuki, Mika	Form Letter	

2.0 Public Review and Consultation Process

Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
448. Sweel, Greg	Form Letter	
449. Swift, Kevin	See Response	38
450. Taber, Lucile J.	Form Letter	
451. Taiz, Lee	Form Letter	
452. Talamo, Dave	Form Letter	
453. Tankenson, Ethel	Form Letter	
454. Thomas, Dennis	Form Letter	
455. Thomas, Joseph	Form Letter	
456. Thomas, Kevin	Form Letter	
457. Thomas, Marilyn	Form Letter	
458. Thomas, William	Form Letter	
459. Thorburn, Linda	Form Letter	
460. Tiarks, Daniel	Form Letter	
461. Tisdale, Donna (May 24, 2006)		8
462. Tisdale, Donna (July 16, 2006)	1, 3, 9, 9b, 9d, 12c, 14a, 16b, 17, 18e, 18g	28
463. Tomczyszyn, Michael	Form Letter	
464. Tomlinson, Mike	Form Letter	
465. Torgan, Burt F.	Form Letter	
466. Torres, Luz	Form Letter	
467. Trapp, Gene R.	Form Letter	
468. Travis, Annabelle	Form Letter	
469. Triplett, Tia	Form Letter	
470. Turek, Gabriella	Form Letter	
471. Turner, Shirley	Form Letter	
472. Tyler, Steve & Jill	Form Letter	
473. Vaden, Marcia	Form Letter	
474. Van Bloemen, Dona	Form Letter	
475. Vandersloot, Jan D.	Form Letter	
476. Vandrags, Brady	Form Letter	
477. VanVoorhis, David	Form Letter	
478. Varga, John L.	Form Letter	
479. Varvas, Jason	Form Letter	
480. Velyvis, Stephen	Form Letter	
481. Voss, Randall	Form Letter	
482. Warenycia, Dee	Form Letter	
483. Warenycia, Paul	Form Letter	
484. Watt, Mark	Form Letter	
485. Watts-Rosenfeld, Susan	Form Letter	
486. Weatherman, John	Form Letter	
487. Weaver, Judy	Form Letter	
488. Weaver, Kenneth	Form Letter	
489. Weeden, Noreen	See Form Letter Response	
490. Weikel, Wendy	Form Letter	

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Commenter	Issues (Refer to Table 2.0-1 for Issue Description)	Response (Letter No.)
491. Weinberg, Amanda	Form Letter	
492. Weisz, Russell	Form Letter	
493. Welsch, Bill	See Response	39
494. Welsh, Deborah	Form Letter	
495. Werner, Scott	Form Letter	
496. Werninghaus, Karla	Form Letter	
497. Weyer, Linda	Form Letter	
498. White, Kat	Form Letter	
499. White, Michael	Form Letter	
500. Whitnah, Claudia M.	Form Letter	
501. Wikle, Victoria	Form Letter	
502. Wild, Kathryn	See Form Letter Response	
503. Wilder, Jenny	Form Letter	
504. Wiley, Carol	Form Letter	
505. Williams, Margie	Form Letter	
506. Williams, Mark	Form Letter	
507. Williams, Nicholas	Form Letter	
508. Wilson, Mary Ann	Form Letter	
509. Winslow, Lynda	Form Letter	
510. WinterSun, P-A	Form Letter	
511. Wisti, Mike	Form Letter	
512. Wolf, Rachel	Form Letter	
513. Wolfe, Gerry & Vicki	Form Letter	
514. Wood, Wendell	Form Letter	
515. Woodcock, Charlene	See Form Letter Response	
516. Woodcock, William E.	Form Letter	
517. Woods, James L.	Form Letter	
518. Worthy, Crista	Form Letter	
519. Wright, Pam	Form Letter	
520. Wright, Sharon	Form Letter	
521. Wuhrmann, Karin	Form Letter	
522. York, Mark	Form Letter	
523. Youhas, Sara	Form Letter	
524. Yuen, Lois	Form Letter	
525. Yurkovsky, Alexandra	Form Letter	
526. Zarkowski, De Ann	Form Letter	
527. Zivian, Anna	Form Letter	
528. Zukoski, Katie	Form Letter	