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Thank you very much for your time and consideration in this matter.

Sincerely,



Bill Karr

CHAIRMAN

Inland Wetlands Coalition

cc: Salton Sea Fish and Wildlife Club
Cal. Dept of Fish and Game
Coachella Valley Audubon Society
San Bernardino Valley Audubon Society
So. Cal. Chapter Wildlife Society
U.S. Fish and Wildlife Service

SEE FOLLOWING RESPONSE.

RESPONSES TO COMMENTS

(not entered directly on comment letters)

3. SDG&E

No. 1: Figure No. 6 has been changed as suggested. No. 2: comment incorporated. No. 3 is a suggested policy change. No. 4: "Will" has been changed to "may", but the rest of the suggested language has not been incorporated. Commentor cites no evidence to support the contention that the impacts of the change in land use will be confined to the Salton Sea area. The projected ten power plants in the Heber area, for example, cannot avoid changing the general ambiance and visual character there.

7. PUBLIC WORKS (comments on the Plan)

Numbers 1,2,4,5,6,7,8,10,14,15,16,17 and 18 have been incorporated.

Number 3: "Regional Equity" is part of BLM's list of categories, which we reproduced, but don't presume to interpret.

Number 9: Comment noted. In most cases injection would be required, but minor projects, or projects in remote areas might not necessarily require injection.

Numbers 11,12, and 13: Comment noted.

Number 21: The "Participating Staff" has been moved to the title page.

Number 22: A number of changes to the "Glossary" have been made.

8. PUBLIC WORKS (comments on the EIR)

Number 1 and 2 have been incorporated. Number 3: heading corrected; first sentence - comment noted. The second sentence should have read:

"World-wide experience with petroleum and geothermal production tends to

indicate that subsidence serious enough to require remedial attention has occurred only where little or no injection was practiced, and then only occasionally." Although demonstrably a true statement, commentors "disagreement" appears to be on the propriety of its inclusion. It and the third sentence have been deleted from the section. The suggested revision from sentence 4 on has been incorporated. Number 4: comment noted. Number 5: has been incorporated.

10. SIERRA CLUB

Numbers 1,3,4, and 5: Comments noted. Number 2: Although the Plan does not specifically exclude "on-site dumps", no geothermal application has yet requested such a facility, nor have any developers indicated such plans for the future. Any on-site dump would have to meet all of the requirements for an off-site class II-I facility.

12. DEPARTMENT OF WATER RESOURCES

These comments tend to suggest provisions more specific than is appropriate for a General Plan or policy document. The County does have an implementing regulation, "Terms, Conditions, and Standards for Geothermal Development" which generally reflects the suggestions. It is scheduled for revision upon adoption of the Plan. These comments will be reconsidered at that time. All projects receive environmental review, which usually results in such protective provisions. The comments also cover areas where the RWQCB and CDOG have primary responsibility or actually preempt the County. The following responses are nevertheless offered:

- a. The Plan Implementation section requires all applicants to demonstrate how the environment will be protected. This is reflected, among other provisions, in a condition on all geothermal permits that an emergency plan be prepared covering all anticipated events, including spills. Bonding and insurance is also required for all operators under geothermal permits. The Division of Oil and Gas has taken steps to establish a Valley-wide Spill Contingency Plan including both operational and financial provisions.
- b. Comment noted. Generally subsurface data must await drilling rather than precede it.
- c. We understand both RWQCB and DOG keep records of events that might contaminate surface or subsurface waters.
- d. Comment noted. These provisions are reflected in the standards.

14. DEPARTMENT OF CONSERVATION

Subsidence: Comment noted. The Plan section describing CDOG includes the statement: "DOG preempts local agency surface regulations which might interfere with state subsurface regulations." The preeminence of the State in regulating subsurface operations is so clear that no mention was felt necessary. Changes have been made to the text (pages 66-67) to provide that County injection standards be consistent with the requirements of CDOG.

Agriculture: No response required.

15. ENVIRONMENTAL HEALTH DIVISION

Comment noted. The Noise "Element" of the General Plan contains noise guidelines. The County's "Terms, Conditions, and Standards for Geothermal Development" contain precise and detailed noise criteria for geothermal projects, including both spectra and db level. The specific

EIR's each contain detailed noise analysis. We appreciate the Division's offer of assistance and will consult with them in the revision of the "Standards."

16. DEPARTMENT OF FISH AND GAME

No. 1 a. The estimate of 34 acres per typical plant (2040 acres for full development) is for permanent conversion of land use for plant, well sites, and pipelines. Although a well drill site may disturb 2 acres, it is temporary. The residual well head will require about 1/100 of an acre.

b. The best data on spills to date, their probability, and possible magnitude is on p. 62-63 of the South Brawley EIR (document 6, Vol 1). We believe the "generalized statement" best represents what is presently known.

c. The Department's past request that the County undertake studies desired by CDF&G (and perhaps best performed by them) is acknowledged. CDF&G has failed to demonstrate the need for the type of study apparently sought.

d. Items 9a - 9H in CDF&G's letter of March 13, 1984 are cast as specific permit conditions (or prohibitions). Most of them have appeared on permits issued by the County, and are included among mitigation measures listed in the incorporated documents. They are thus available for future application, as appropriate.

e. The 7120 pages "incorporated" into this EIR is a small portion of the "literature on the subject." The "referenced," but not officially incorporated documents (Nos. 26 - 79) are also precise, useful, geothermally related, Imperial County specific documents.

Both together are still a small part of the literature. See responses to the Wildlife Society's comments.

f. The maps did not properly show the areas corresponding to the documents. They have been corrected.

2. The suggestion would be appropriate to consider in connection with a specific project application.
3. See Response to the Wildlife Society Comments.
4. See Response to the Wildlife Society Comments.
5. Comment noted.
6. Comment noted.
7. The "County Overview" portion of the General Plan circulated with the August draft is not included with this document. The change will be incorporated in the "Overview."

17. THE WILDLIFE SOCIETY

General Response

The Conservation Element of the County's General Plan addresses (as the Geothermal Plan is not intended to address) the protection and enhancement of habitat and biological resources. Pages 79 and 80 of that document are reproduced here. They illustrate the County's strong interest in these resources and the Salton Sea in particular. The Conservation Element was prepared in 1973. It is currently being revised. Commentor should first determine if the emphasis on biological resources they seek in the Geothermal Plan does not already exist in the Conservation portion of the General Plan; and if not, then make suggestions as appropriate.

Based upon the extensive studies conducted of Imperial County and geothermal technologies, we believe that overall the projected geothermal

development is compatible with biological resources. Normal geothermal energy production is essentially benign. It's principal effluent is water. The potential hazards stem almost entirely from the risk of accidents. The bulk of analysis in EIR's for geothermal plants and the bulk of permit conditions deal with the impacts that only might happen. And, if the very worst things happened, they would be serious, but not irreparable - and certainly not disasterous. We believe the intensity of concern expressed by this comment letter is excessive.

No. 1. Comment noted.

No. 2. The comment expresses an opinion about the intentions of the County. No response is appropriate.

No. 3. Comment noted.

No. 4. See response to comment No. 18.

No. 5. Comment noted.

No. 6. The comment asks for a policy commitment to require geothermal projects to use the lowest quality water available. In addition to this being a policy matter, the Plan noted that the assignment of water rights rests with other agencies. Use of "desalinized water" is discussed in the literature on the Salton Sea. The anticipated two-thirds of the projects being water self-sufficient does in fact constitute using "the lowest quality water available." See also No. 10..

No. 7. Comment noted. Transmission lines are permitted by other agencies which would determine specific design standards. We concur with using the appropriate design for the diverse environments.

No. 8. See response to No. 7.

No. 9. See response to comment No. 18.

No. 10. An EIR must analyze the project proposed. This project does not anticipate the availability of significant amounts of condensate (desalinized brine) for disposal into the Salton Sea. Although discussed and considered, it should not be anticipated. (1) The balance of water and solids remains the same. Water evaporated in the cooling towers, if not condensate, would likely be drain, canal, or other water diverted from the Sea. The annual tonnage of solids to the Sea would remain the same. (2) The disposal in the geothermal reservoir of solids in addition to those produced from the reservoir, although possible in some cases, does not appear viable on a significant scale. See Salton Sea MEIR pp. 3.2 - 30 - 34.

No. 11. Comment noted.

No. 12. Comment noted.

No. 13. Comment noted. The designations of priority for "saved" water is a policy decision.

No. 14. The "biological assessments" in this EIR were made by qualified biologists. The comments on CEQA are noted. The Salton Sea MEIR does discuss some ways in which geothermal development might enhance habitats in the Salton Sea area.

No. 15. Comment noted. The important language in this section is: "In all events, an initial study or project evaluation will be performed and a decision made, pursuant to CEQA and Imperial County's CEQA implementing procedures, as to the proper environmental documentation needed for each project permitted."

No. 16. The "increasing salinity of the sea, lowering of sea levels, destruction of wetlands, and decreasing supplies of fresh water in the county are all cumulative impacts . . ." that will occur with or without geothermal development. The "cumulative effects" of

geothermal in these areas will be insignificant. See also comment 18.

No. 17. The statement on page 78 (of the August draft) said "It is anticipated that this EIR will. . .provide environmental documentation for all or most, exploratory, test facility, minor and intermediate geothermal projects. . ." In other words, not including projects likely to have impacts. See also response to No. 15. Otherwise, we concur.

No. 18. This Plan proposes no development not anticipated in the previous Plan and the incorporated EIR's. Those documents considered more development than this Plan. Preliminary analysis determined there had been no significant changes in the environment. Of concern were possible changes in geothermal developers' plans and in technology. Thus, consultation with industry was necessary and resulted in the sharply reduced development scenario from 4500 MW to 3000 MW. What technological changes had occurred indicated no new impacts but possibly some reduction. The incorporated documents are more than adequate in assessing the impacts and suggesting mitigation measures for this project. No comments received assert that there have been significant changes in the environment, nor (except for the following comment) do any comments point out inadequacies in any of the incorporated documents. CEQA requires notification of interested parties that a draft EIR has been prepared. CEQA does not require that copies be provided to all interested parties - only that they be made available for public review. In this case, both the Plan and the supporting EIR was provided to commentor. All of the twenty-five incorporated documents have been available for review. Commentor has made no attempt to review them, here. The tenor of the comments strongly suggests that commentor has not reviewed them. The lack of any specific reference to a page or section of any of the incorporated

documents supports this suggestion. We believe the repeated comment to "beef up" various sections simply reveals commentor's being unaware of the material already available.

If, in fact, commentor has reviewed the incorporated documents, then most of these comments are unreasonable requests for study and elaboration which is inappropriate for an EIR for a policy document which itself permits no development without subsequent permits and environmental review.

No. 19. Commentor's understanding is incorrect. The court found the Salton Sea MEIR adequate for the Salton Sea "G" Zone. It was because of the thoroughness and adequacy of the MEIR, that the court found the "findings" in support of the rezoning inadequate because they did not cite all of the impacts identified in the MEIR.

No. 20. See Response No. 18.

No. 21. See Response No. 18. The Salton Sea MEIR is part of this document.

No. 22. See Response No. 18.

No. 23. The introductory paragraph of the "Alternatives" section identifies this project as "establishing policies that will facilitate geothermal development while imposing reasonable restrictions." The closing paragraph repeats this. The various alternatives to this are discussed.

No. 25 We believe this EIR is adequate in all respects under CEQA.

We cannot understand commentor's wish that they be consulted when they have been sent a draft and asked to comment. That commentor may not approve of the document produced does not in itself indicate a failure of the public review process. We believe the "incorporation"

used here is fully within the intent of CEQA. A site specific project which depended entirely on other EIR's prepared for general area or policy documents might be inadequately assessed, but such is not the case here.

We believe that although most of the "suggested changes" put forth by commentor are vague, at best, they are probably all satisfied by the incorporated documents. For commentors to insist that the incorporation of documentation which meets their requests is "illegal" is puzzling to say the least.

Finally, the Salton Sea MEIR (for an example of most interest to commentor) does identify various sensitive biological areas. Their identification (as is all of the information in any EIR) is a guide to decision makers - not a mandate.

Imperial County and the Salton Sea is a multiple resource area - no one resource merits use to the exclusion of the others. Historically the Colorado River has flowed into the Salton Sink a number of times cyclically forming fresh water lakes, which then became saline, and eventually dried up. The present ecological system - the Sea, the wetlands, the canal and drainage systems, the agricultural land, and the New and Alamo Rivers--is artificial and artificially maintained. It is all less than 100 years old. The geothermal resource was not imported into the Valley as most of the biological community was. It has taken millions of years to evolve and it not any wetland, flora or fauna must be used where it occurs. Siting recreational areas and sensitive habitats away from prime geothermal resources is an alternative that should be considered.

CHAPTER IX. BIOLOGICAL RESOURCES

ISSUES

1. Loss of riparian habitat or "wetlands" resulting from flood control or water management programs is a major concern of wildlife management.
2. Loss of protective cover and habitat resulting from practices of intensive agriculture, particularly the burning of river bottom areas.
3. Degradation of water habitat by irrigation waste and untreated or inadequately treated sewage.
4. Habitat quality is threatened by urbanization and human encroachment.

OBJECTIVES

1. Recognize the fragile character of plant and wildlife resources and their dependence upon quality habitat.
2. Recognize that biological resource values are integral and worthwhile factors in the overall decision-making process.

RESOURCES OR RESOURCE AREAS OF STATEWIDE SIGNIFICANCE OR CRITICAL CONCERN

The State of California is charged with primary responsibility for the enhancement, control, and utilization of fish and wildlife. The California Department of Fish and Game designates habitats of great importance that are significant for the perpetuation or management of various species. These habitats are of statewide significance and include riparian habitat, fresh and saltwater marshes, tidal mudflats, sloughs and lagoons, and critical specialized habitat for other wildlife, including all rare and endangered species. Significant habitat areas also include those areas where wildlife from a large surrounding region depend on a relatively small acreage of specialized habitat during some period of their existence.

(From Conservation Element page 79)

Areas of critical concern within the broader "significant habitat" areas either provide critical animal needs, such as water or nesting sites, or possess significant concentrations of rare or endangered species. Critical habitats also include areas adjacent to National Co-operative Wildlife Areas, National and State Waterfowl Refuges, and extraordinary fishery and wildlife waterways as identified by the Resources Agency as Class I Premium Waterways.

The Office of Planning and Research has identified the following areas within Imperial County which are of potential statewide significance or critical concern.

- Salton Sea
- Colorado River (Topock Gorge and Parker Dam to Imperial Dam)
- Algodones Dunes
- Imperial Reservoir - Imperial Dam
- Yuma Island

The County may submit petitions to the Office of Planning and Research for the deletion or inclusion of resources or resource areas which may be of statewide significance or critical concern. Areas which the County feels may qualify for inclusion should be carefully examined and documented. The San Felipe Creek area was not identified in the First State Report and may warrant consideration.

WILDLIFE RESOURCES AND HABITAT AREAS

Plants and wildlife are of important scientific value because of their uniqueness and their adaptation to particular environmental conditions.
(From: "Conservation Element" page 88)

SALTON SEA COORDINATING COMMITTEE

The only substantive comment to which a response might be made is that "sensitive ecological and recreational areas should be identified and protected." (fifth paragraph) We believe the existing environmental documentation accomplishes this adequately for this portion of the General Plan. (See also Response to the Wildlife Society letter.) We anticipate that all major projects, wherever located, will have an EIR, and that any project requiring it (such as one in a very sensitive area) may also have an EIR. Commentor implies that he has maps and lists of areas of "significant ecological and recreational importance," but declines to make them available at the present time. We are at a loss as to how to respond.

The County has supported, and continues to support, efforts towards enhancing the beneficial uses of the Salton Sea. We applaud the "Coordinating Committee's" interest and concern in this respect. We do not believe Imperial County has primary responsibility for initiating or carrying out such efforts. We do not believe that the significant concerns regarding the Salton Sea are geothermal development related, nor that any studies, or environmental documentation beyond that already done is necessary to support this Plan for permitting future, as yet unapplied for, geothermal projects, which will each be subject to individual environmental review.

INLAND WETLANDS COALITION

The EIR is a fully adequate document under CEQA. Commentor apparently has not taken the trouble to review it entirely. It is also understandable that commentor may not appreciate that this Plan does not authorize any specific development. Each subsequent project will be subject to the CEQA environmental review process.