

SECTION 10.7

Comments and Responses for Citizens

10.7 Comments and Responses for Citizens

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April 6, 2002

Mr. Bruce D. Ellis
Bureau of Reclamation
Phoenix Area Office (PXA001500)
P.O. Box 81169
Phoenix, AZ 85069-1169



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

Dear Mr. Ellis and Mr. Grubaugh:

RE: Imperial Irrigation District Water Conservation and Transfer Project
Draft Habitat Conservation Plan/Draft Environmental
Impact Report/Environmental Impact Statement

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

There are many concerns regarding the Salton Sea that need addressing before transfer of water can be conducted by any of the agencies.

My principal concerns are:

1. Any water transfer shall not undermine efforts to restore the Salton Sea.
2. Should not have a negative impact on the regions surrounding the Salton Sea.
3. Should address alternative method of fresh water intake to the Sea.
4. Should not ignore beneficial uses of the Sea both, economically and recreational.

The EIR/EIS as now proposed has no consideration as to the restoration project of the Salton Sea and ultimately to its demise.

Respectfully,
Rosa Reagles
Rosa Reagles,
P.O. Box 5390
Salton City, CA 92275

Post-It® Fax Note	7671	Date	4-10-02	# of pages	1
To	Laura Harvill	From	Elston Grubaugh		
Co./Dept.	CH2M Hill	Co.	220		
Phone #		Phone #	760-334-9752		
Fax #		Fax #	760-389-9009		

Letter - C2. Signatory - Rosa Reagles.

Response to Comment C2-1

Refer to the Master Response on *Other—Relationship Between the Proposed Project and the Salton Sea Restoration Project* in Section 9 of this Final EIR/EIS.

Response to Comment C2-2

Comment noted. As described in the Draft EIR/EIS, it is anticipated that there will be adverse impacts to the regions surrounding the Salton Sea. Refer to the Master Response on *Socioeconomics-Property Values and Fiscal Impact Estimates* in Section 9 of this Final EIR/EIS for additional description of the socioeconomic impacts to the Salton Sea region. Impacts to other environmental resource areas are described in other sections of the Draft EIR/EIS.

Response to Comment C2-3

Comment noted.

Response to Comment C2-4

Economic resources of the Salton Sea are discussed in Section 3.14 and Recreation Resources are discussed in Section 3.6 of the Draft EIR/EIS.

Response to Comment C2-5

Refer to the Master Response on *Other—Relationship Between the Proposed Project and the Salton Sea Restoration Project* in Section 9 of this Final EIR/EIS.

C2-1

C2-2

C2-3

C2-4

C2-5

February 28, 2002

Letter - C3. Signatory - Walter Holtz.

Board of Directors
Imperial Irrigation District

Via: Hand Delivery @ Water Transfer EIR/EIS Public Workshop

Members of the Board:

Attached please find the document entitled "Salt Distributions in Cracking Soils and Salt Pickup by Runoff Waters" which validates concern over the long-term effect of salt accumulation from Pump Back Systems as a means of water conservation.

C3-1

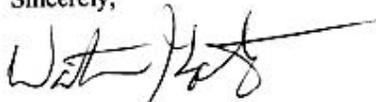
I would like this document to become a part of the public comments regarding the EIR/EIS. I am asking the Board direct their water transfer staff to review this report and provide me with their comments prior to the public hearings to be held by the state regarding the EIR/EIS.

C3-2

I have considerable concern over the District's opinion that these systems are the answer to our water conservation needs. We must consider the long term viability of agricultural production in the Imperial Valley and the impact of reducing or eliminating the quality of the soil here; thus in turn destroying our industry and the infrastructure that goes with it. This study and the salt accumulations have not been given sufficient, if any, attention.

Thank you for your immediate attention to this matter.

Sincerely,



Walter Holtz
102 Ralph Road
Imperial, CA 92251
355-2872

*Received 2.28.02
for
cc WD, RPM, LE*

Response to Comment C3-1

IID has cited and continues to cite the paper entitled, "Salt Distributions in Cracking Soils and Salt Pickup by Runoff Waters (Rhoades et. al. 1997) as support for it's positions on tailwater and leaching, namely:

- a) That horizontal leaching does occur on cracking clay soils.
- b) Therefore, some fraction of tailwater should be considered as reasonable and beneficial use for leaching purposes.
- c) The 11 percent leaching fraction determined to be sufficient by the Jensen report (Jensen 1995) will not allow IID water users to maintain an adequate soil salinity balance.
- d) In fact, taking the IID service area as a whole, IID water users would benefit by increasing, rather than decreasing, their leaching fraction.

However, the long-term effect on soil salinity induced by the use of a tailwater return system cannot be determined from this study alone. Note that the data presented only address elevated salinity levels in tailwater during the first 30 minutes of a runoff event. In addition, no tailwater volumetric data were collected. Therefore the average tailwater salinity over an entire irrigation area cannot be determined. Most of the paper is concerned with demonstrating how insufficient leaching results in increased soil salinity along the length of a field.

IID has collected limited volumetric and salinity data from existing tailwater return systems. These data do give some indication of the potential impacts and challenges associated with the long-term use of such systems. The average tailwater salinity increase over a complete irrigation has typically ranged from 6 to 42 percent, depending on soil type, crop, and tailwater duration. One of the most critical aspects of tailwater return system operation and management is the mix of irrigation and tailwater at the head of the field. The average increase in salinity of the mixed water has typically ranged from 4 to 21 percent, again depending on soil type, crop, and tailwater volume. Depending on the soil type and crop sensitivity to salinity, such increases could require a higher leaching fraction, additional tile drains, and/or increased leaching applications between crops.

As the Rhoades et al. (1997) paper points out, salinity management is always critical, and as IID data show, salinity management is even more critical with the use of tailwater return systems. However, IID staff believes that tailwater return systems can be successfully managed

February 28, 2002

Board of Directors
Imperial Irrigation District

Via: Hand Delivery @ Water Transfer EIR/EIS Public Workshop

Members of the Board:

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C3-1

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C3-2

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Thank you for your immediate attention to this matter.

Sincerely,



Walter Holtz
102 Ralph Road
Imperial, CA 92251
355-2872

Received 2.28.02
for
cc WD, RPM, LE

Response to Comment C3-1 (continued)

over the long term without reducing soil productivity. Successful management of a tailwater return system will, in many if not most cases, require additional leaching. The conservation estimates for existing tailwater return systems are adjusted to account for a higher leaching requirement. Likewise, when we have modeled tailwater return systems as part of the mix of conservation methods for the San Diego agreement, we have accounted for increased leaching requirements as well.

IID staff have long been of the opinion that water users should choose conservation methods best suited to the crops they grow, the soils they farm, and the physical layout of their fields. I do not believe that IID staff have intended to present tailwater return systems as the only answer to the IID's water conservation needs. IID did select tailwater return systems as the pro-forma conservation method during pricing negotiations. They were in use within the IID service area, and many water users had expressed an interest in using tailwater return systems. Therefore, IID wanted to obtain a price for conserved water that would cover the installation and use of a tailwater return system, should a water user wish to adopt that technology as a water conservation method.

Response to Comment C3-2

See response to Comment C3-1.

SALT DISTRIBUTIONS IN CRACKING SOILS AND SALT PICKUP BY RUNOFF WATERS

By J. D. Rhoades,¹ S. M. Lesch,² S. L. Burch,³ J. Letey,⁴ R. D. LeMert,⁵ P. J. Shouse,⁶ J. D. Oster,⁷ and T. O'Halloran⁸

ABSTRACT: Detailed measurements were made of the levels and distributions of salts present in representative soil profiles and fields and associated tailwaters in the Imperial Valley of California. The findings showed that the potential salinity-pickup hazard may be greater in this valley that is dominated by cracking soils than classical theory would predict. Salts that would otherwise be "isolated" in seedbeds or leached downward during irrigations are more "exposed to" and "picked up by" the runoff water than previously recognized as a result of the flow of the irrigation water throughout the beds and horizontally in the topsoil via the extensive network of cracks and fractures that form in the cracking soils. As a result, the pattern of salinity within the beds of such soils is one-dimensional, rather than the expected, classical two-dimensional pattern. Salt content in the tailwater associated with cracking soils was higher and sustained over longer periods of time than in the case of non-cracking soils.

INTRODUCTION

Water is a valuable and scarce resource in arid and semiarid regions where a high percentage is used for irrigation. Runoff of irrigation water ("tailwater") is a common phenomenon from fields irrigated by gravity-flow surface systems. The minimization and the utilization of tailwater is a requisite to the efficient use of water resources for such systems.

Positive utilization of tailwater could include: reuse for irrigation (for the same or other fields), return to surface streams, the creation of wetlands, etc. In the Imperial Valley of California, tailwater drainwater is comingled with the subsurface drainwater and discharged to the Salton Sea. Although some runoff to the sea may be considered beneficial to the maintenance of a suitable elevation and salinity of the sea, excessive runoff in the past has contributed to a rising sea level with negative consequences to surrounding agricultural land and recreational facilities.

One means of reducing runoff to the sea is to install tailwater recovery systems, whereby the water is recirculated on the same field or farm. Generally the value of the "conserved water" will not justify the costs of the recovery system unless fees are imposed against excessive discharges. Because the economic value of water is higher for urban use, and water supplies in California are limited, there is opportunity for a mutually beneficial cooperative agreement between agricultural and urban sectors in this regard. The urban sector can pay for the tailwater recovery system in return for receiving water in an amount equivalent to that conserved.

Such an arrangement has been considered for implementation in the Imperial Valley. However, salinity is an old nemesis there and the farmers are concerned that salinity levels will increase unduly in their soils through the recycling of tailwater for irrigation. The source of water for irrigation is the Colorado River, which has an electrical conductivity (EC) of about 1.3 dS/m. Prevalent "textbook logic" would lead to the conclusion that salt pickup via tailwater flow should be negligible because the "leading edge" of the water that flows over the soil is thought to infiltrate into the soil and to "carry" the readily soluble salt with it. The salt in the soil is not expected to diffuse upward significantly when the water is percolating downward. With this prevalent view of the transport processes, one would not expect to find a significant increase in the salinity of the tailwater compared to the irrigation water other than that which might be derived from the dissolution of suspended sediment gained through furrow erosion. Such were the conclusion and findings of the study of Reeve et al. (1955) into the potential to reclaim saline soils in the Coachella Valley of California by "flushing."

However, one can envision situations where salt could be accumulated in the seedbed region of the soil through convective and capillary flow during early season periods and subsequently exposed to surface flows and redissolved in them when the "integrity" of the bed fails due to soil cracking and fracturing and when the infiltration rate of the furrows is diminished later in the irrigation season as the result of sedimentation and crusting. Most theory and research about salinity transport has been directed to vertical leaching of salts and little attention has been given to the lateral transfer of salts in surface runoff, especially regarding soils of various shrink-swell capacities. In any case, some Imperial Valley farmers were concerned about the possibility of excessive salinity buildup in their soils from recycling of tailwater. For these reasons, this study was undertaken. It was carried out in a set of commercial fields in Imperial Valley selected by local staff of the Imperial Irrigation District to be representative of major soil types, including those with varying shrink swell properties, though much of the area consists of soils that crack considerably upon drying. It was postulated that the dynamic salt transport would be significantly different on soils that have high shrink-swell properties from those without these properties. The study had two goals. One was to measure salinity in the soil and runoff water to obtain evidence of the extent of and the potential for salt pickup in tailwater and of the influence of soil properties in this regard. The other was to obtain information on the dynamics of salt transport in cracking and noncracking soils so that the feasibility of tailwater recycling could be assessed more reliably.

Letter - C3
Page 2

¹USDA-ARS, U.S. Salinity Lab., 450 West Big Springs Rd., Riverside, CA 92507.

²USDA-ARS, U.S. Salinity Lab., 450 West Big Springs Rd., Riverside, CA.

³Imperial Irrig. Dist., P.O. Box 937, El Centro, CA 92251.

⁴Dept. of Soil and Envir. Sci., 2208 Geol., Univ. of Calif., Riverside, CA 92521.

⁵USDA-ARS, U.S. Salinity Lab., 450 West Big Springs Rd., Riverside, CA.

⁶USDA-ARS, U.S. Salinity Lab., 450 West Big Springs Rd., Riverside, CA.

⁷Dept. of Soil and Envir. Sci., 2208 Geol., Univ. of Calif., Riverside, CA.

⁸Imperial Irrig. Dist., P.O. Box 937, El Centro, CA.

Note. Discussion open until March 1, 1998. To extend the closing date one month, a written request must be filed with the ASCE Manager of Journals. The manuscript for this paper was submitted for review and possible publication on April 26, 1996. This paper is part of the *Journal of Irrigation and Drainage Engineering*, Vol. 123, No. 5, September/October, 1997. ©ASCE, ISSN 0733-9437/97/0005-0323-0328/\$4.00 + \$.50 per page. Paper No. 13087.

EXPERIMENTAL PROCEDURES

Nine fields were selected to include a representative set of soil and crop types for the Imperial Valley. The crops selected for investigation were sugar beets (flat beds; furrow-irrigated), border-irrigated alfalfa (no beds), and furrow-irrigated alfalfa (flat beds). For each cropping system, three fields were selected to vary shrink-swell characteristics and to evaluate their effects; one with clay textured soils, one with sandy soils, and one of intermediate texture. The soil classifications for each of the investigated fields are presented in Table 1. The terms "heavy," "medium," and "light" refer to the relative clay content and the expected degree of cracking. Thus, the soil identified as being heavy is one that exhibits high shrink-swell properties, whereas the light soil exhibits relatively little shrink-swell behavior. By employing these nine fields, the effects of beds could also be evaluated along with variation in the soils' shrink-swell properties. The irrigation and other management of these fields were routinely carried out by the farmers. We only monitored the salinity conditions of the soils and tailwaters. A bromide tracer study was conducted on two of the fields and the details of that study are reported elsewhere (Shouse et al. 1997).

Surface water samples were collected during two to five irrigations of one cropping season at the head of each field and at points one-fourth, one-half, three-fourths, and the end of the field. At each sampling point, except the head of the field, water samples were collected when the leading edge (LE) of the water reached the point and then at 5, 15, and 30 min after the leading edge had passed the point. The EC of all samples was measured using a standard, temperature-compensating conductivity meter as an index of the water salinity.

Soil salinity conditions in the soil profiles and beds from the head to tail ends of the nine fields were established using the instrumental methodology and mobilized systems of Rhoades and colleagues (Rhoades 1992, 1993, unpublished paper 1994). Measurements of soil electrical conductivity were obtained along a six-row-wide traverse in each furrow-irrigated field about every meter using a tractor-mounted, mobile, four-electrode system. These measurements were made for two such transects separated by 8 m in the furrow-irrigated alfalfa

fields. Only one transect was made in the sugar beet fields. Analogous measurements were not made in the border-irrigated alfalfa fields to avoid damaging the crop. These data were acquired to determine the trend of average root zone salinity in relation to distance along the path of irrigation. Additional measurements of electrical conductivity were made in the furrow-irrigated fields at sites every 5–10 m along the transects with a mobile, combination electromagnetic-induction/four-electrode system and, in the border-irrigated fields, using hand-held sensors. Exact site spacing varied depending on transect length.

Soil samples were acquired at nine sites in each field. These data, together with the analyses of the soil samples, were acquired to determine the distribution of salinity within various two-dimensional regions of the seedbed and throughout the rootzone to a depth of 1.2 m. Soil salinities were determined for the samples using the laboratory paste procedure of Rhoades et al. (1989). In the six furrow-irrigated fields, three "soil cores" were acquired at each sampling site; one core was centered on the bed, one was centered on the furrow, and one was centered intermediately between the other two. Within the three border-irrigated fields only one "core" was acquired at each sampling site. In all cores, soil samples were obtained from the following depth increments: 0–15, 15–30, 30–45, 45–60, 60–90, and 90–120 cm. This produced 162 soil samples from the furrow-irrigated fields and 54 soil samples from the border-irrigated fields. The soil samples were used as "ground truth" to calibrate the instrumental sensors individually for each field condition using the spatial regression modeling techniques of Lesch et al. (1992, 1995a, 1995b). A user-friendly software package is available in this regard and additionally for portraying the results in maps and various other graphical forms (Lesch et al. 1995c).

RESULTS AND ANALYSIS

Soil Measurements

For eight of the nine fields studied, high correspondence was observed between measured and sensor-predicted salinity values (r^2 levels of 0.84–0.98). These results (not given) suggest that the salinity distributions obtained with the sensor-measurement/regression methodology employed reflected the true nature of the salinity levels, patterns, and distributions across each survey-transect and that the data basis for the interpretations that follow is reliable. The exception was the furrow-irrigated field of medium soil texture, for which the sensor and ground truth data did not correlate well, possibly due to complex changes in soil type within the profile and across the field or, more likely, an instrument glitch that occurred in that field—one that required repairs and that caused delay and confusion about the data at the time. Since no attempt was made to repeat the measurements in this field, these results will not be reported.

The average rootzone soil salinity (expressed in terms of the electrical conductivity of the saturation-paste extract, EC_e) distribution from the head (left side of figure) to the tail (right side of figure), hereafter referred to as "across the field," of the light textured, furrow-irrigated sugarbeet field is presented in Fig. 1. Though the salinity is somewhat higher in the upper one-third of the field, it is relatively low and uniform across the field. The EC_e values ranged from about 1.3 to 2.0 dS/m. These data suggest that considerable leaching occurred relatively uniformly across the field to produce low levels of soil salinity. The ratio of EC_e/EC_w for this field is equivalent to a leaching fraction of about 0.25–0.30, assuming steady-state conditions and an irrigation water electrical conductivity value, EC_w , of 1.3 dS/m for Colorado River water (Rhoades et al. 1992).

TABLE 1. Description of Fields and Soils Used in Study

Crop (1)	Degree of cracking ^a (2)	Soil type and classification (3)
alfalfa (furrow-irrigated)	heavy	Imperial silty clay; fine, montmorillonitic (calcareous), hyperthermic vertic torrifluvents
	medium	Glenbar clay loam; fine-silty, montmorillonitic (calcareous), hyperthermic vertic torrifluvents
	light	Holtville silty clay loam; clayey over loamy, montmorillonitic (calcareous), hyperthermic vertic torrifluvents
alfalfa (border-irrigated)	heavy	Imperial-Glenbar silty clay loam
	medium	Vint loamy very fine sand loam; coarse-loamy over clayey, mixed (calcareous), hyperthermic typic torrifluvents
	light	Meoland very fine sandy loam; coarse-loamy over clayey, mixed (calcareous), hyperthermic typic torrifluvents
sugar beets (furrow-irrigated)	heavy	Imperial-Glenbar silty clay loam/Imperial clay
	medium	Imperial-Glenbar silty clay loam/Imperial silty clay
	light	Rositas fine sand; mixed, hyperthermic typic torripsamments

^aBased on shrink-swell potential ratings provided in the classification of the soils of the Imperial Valley (Zimmerman 1981).

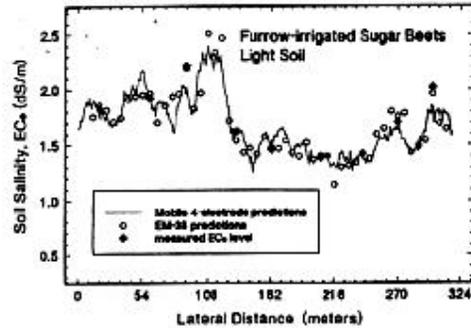


FIG. 1. Relation between Soil Salinity and Distance along Traverse Made across Furrow-Irrigated Sugar Beet Field with Light-Textured Soil

The cross-sectional distribution of salinity within the bed-furrow region of the soil of the furrow-irrigated, light textured sugar beet field is depicted in Fig. 2. This distribution is the classical one depicted in text books wherein soil salinity is lowest beneath the furrow and increases symmetrically towards the center of the bed and with depth. Such a distribution is expected from the flow of irrigation water out of the furrow into the center of the bed, the accumulation of salt in the top of the bed through leaching and evaporation processes, and the increase in salinity with depth through the interactions of leaching and water use by crop transpiration. The salinity level within the bed of this field is low and should not limit seedling establishment of any crop, even salt-sensitive ones (Maas 1990).

The level of average soil salinity increased from the head to the tail of the medium textured sugar beet field (see Fig. 3). The level of salinity in this field is higher than that observed in the analogous light textured field. The EC_e values ranged from about 7 to 12 dS/m; the corresponding leaching fraction would be less than 0.1. The average cross-sectional pattern of salinity in this field is shown in Fig. 4. The salinity distribution across the bed in this soil deviates from the classical distribution. While there is some salinity buildup in the edges of the bed, there is relatively little accumulation of salts in the center of the bed compared to the analogous light textured soil; rather the pattern is indicative of a vertically increasing distribution (one-dimensional pattern).

As the mean salinity of the soil profile increased across the field (Fig. 3), there also occurred a deterministic redistribution

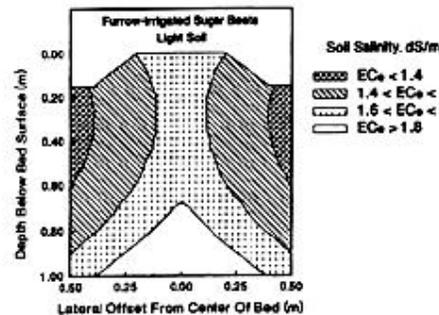


FIG. 2. Average Two-Dimensional Distribution of Salinity within Furrow/Bed Environment of Traverse Made across Furrow-Irrigated, Sugar Beet Field with Light-Textured Soil

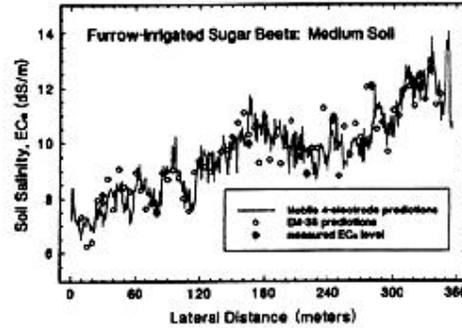


FIG. 3. Relation between Soil Salinity and Distance along Traverse Made across Furrow-Irrigated, Sugar Beet Field with Medium-Textured Soil

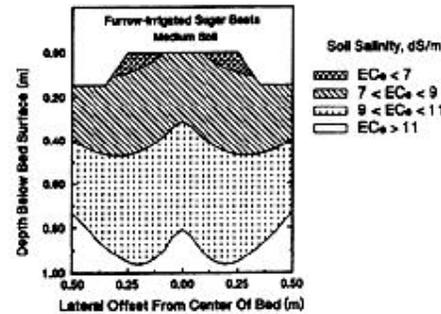


FIG. 4. Average Two-Dimensional Distribution of Salinity within Furrow/Bed Environment of Traverse Made across Furrow-Irrigated, Sugar Beet Field with Medium-Textured Soil

of salinity within the specific depths of the profile. The relative shifts observed in this regard are shown in Fig. 5 in terms of the relative change in salinity per every 100 m of distance across this field traverse, as referenced to the mean distribution for the traverse. These results show that while the average salinity in the profile increased across the field, the salinity in the top 0.5-m depth increased relatively more rapidly and that below 0.5 m increased more slowly with respect to the mean profile of the entire traverse. These results imply that as the

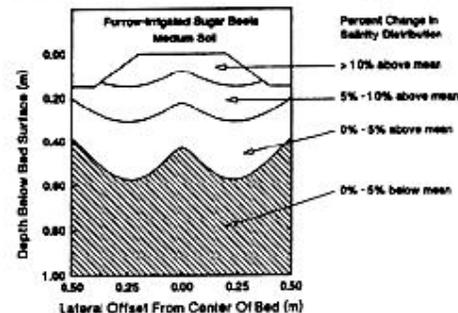


FIG. 5. Relative Changes (Percentage Basis) in Distribution of Salinity, with Reference to Mean Profile, within Soil Profiles Every 100 m along Traverse Made across Furrow-Irrigated, Sugar Beet Field with Medium-Textured Soil

mean salinity increased, relatively more of the salts tended to be concentrated near the soil surface compared to greater depths in the profile. Thus a lateral translation of salts from the head to the tail end of the field appears to have occurred in this medium textured sugar beet field.

Results analogous to that depicted for the medium-textured field in Figs. 3-5 are shown in Figs. 6-8 for the analogous, heavy textured sugar beet field. The mean profile salinity for this field was relatively uniform through the first 350 m; thereafter it decreased and then steadily increased to the tail end of the traverse (Fig. 6). This field had previously been irrigated as two separate fields of about 400 m each in length. Only in the last few years had the separation been eliminated and the field irrigated as one entity 800 m in length. Thus the observed salinity pattern is still indicative of the previous management/field situation. The level of mean salinity is a bit higher in this field than it was in the analogous, medium textured sugar beet field. The EC_e values ranged from about 9-15, indicating a leaching fraction of less than 0.1. The average cross-sectional pattern of salinity observed in this field traverse (Fig. 7) shows that it is, unlike the classical one, entirely one-dimensional and without the appearance of any furrow/bed influence. The level of salinity found in the average bed of the heavy textured sugar beet field would be too high for good stand establishment, as well as too high for good crop growth, of many crops other than salt-tolerant ones. As was the case with the medium textured sugar beet field, the soil salinity tended to redistribute upwards (within the profile) from the head to the tail of the analogous, heavy textured field (Fig. 8).

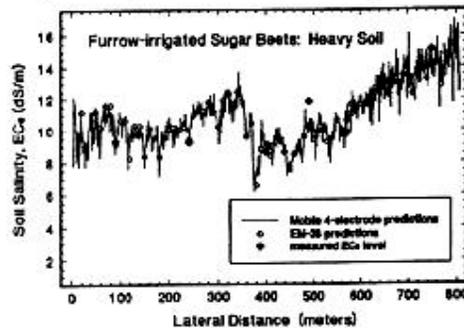


FIG. 6. Relation between Soil Salinity and Distance along Traverse Made across Furrow-irrigated, Sugar Beet Field with Heavy-Textured Soil

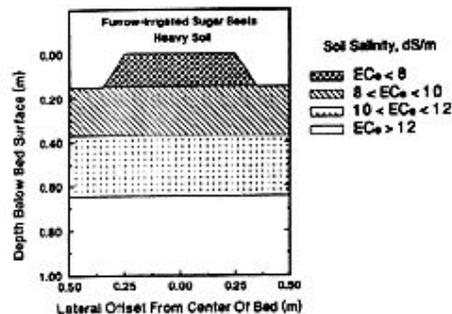


FIG. 7. Average Two-Dimensional Distribution of Salinity within Furrow/Bed Environment of Traverse Made across Furrow-irrigated, Sugar Beet Field with Heavy-Textured Soil

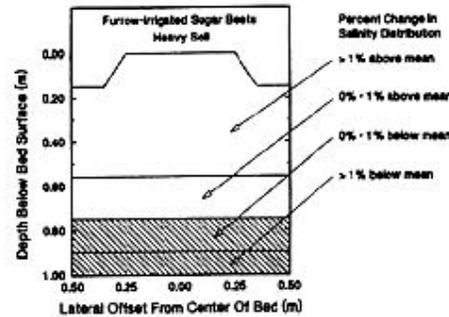


FIG. 8. Relative Changes (Percentage Basis) in Distribution of Salinity, with Reference to Mean Profile, within Soil Profiles Every 100 m along Traverse Made across Furrow-irrigated, Sugar Beet Field with Heavy-Textured Soil

In summary, these data show that soil type markedly affects salinity levels and distributions within the soil profiles of furrow-irrigated sugar beet fields of the Imperial Valley in a very deterministic way. Salinity was relatively low and uniform across fields of light textured soils, suggesting considerable leaching throughout these fields. The salinity accumulation patterns observed within the bed/furrow environment of these fields was of the classical type, with salts increasing towards the center and top of the bed. Average salinity was much higher in analogous, medium textured fields and it was the highest in heavy textured fields. For these types of soils, mean salinity increased towards the tail of the field with a concurrent trend toward redistribution of salt from the lower part of the profile to the top part with distance across the field. The salinity accumulation pattern within the beds of these fields was not of the classical type; rather the pattern was one-dimensional with salinity increasing uniformly with depth beneath both the furrow and bed.

The mean levels of salinity in the soil profiles across the border-flooded, light textured alfalfa field ranged between about 1.0 and 2.5 dS/m, those of the analogous, medium textured field ranged between 2.5 and 5.0 dS/m, and those of the heavy-textured field ranged between 5.0 and 13.0 dS/m. The trend of mean salinity in the soil profile observed across the latter field is shown in Fig. 9. The increase in salinity from the head to the tail observed in this field, like that observed in the other fields with medium and heavy textured soils, re-

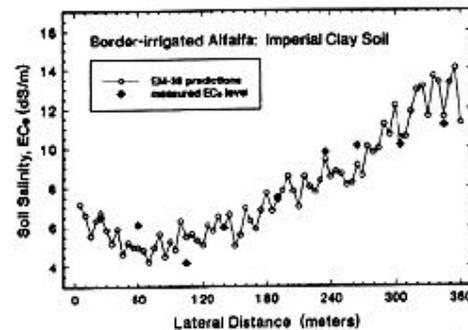


FIG. 9. Relation between Soil Salinity and Distance along Traverse Made across Border-irrigated, Alfalfa Field with Heavy-Textured Soil

ffects the interaction of nonuniformity of water infiltration and leaching and the lateral transport across the field of salts picked up from shallow soil depths. If the field was uniform in soil properties, was irrigated uniformly throughout, and lateral transport did not occur, the mean salinity should be uniform across the field. The areas between the curve shown in Fig. 9, with respect to a straight line set at a value equal to the mean for the entire traverse, provides a measure of the nonuniformity of irrigation/leaching/transport across the field. From such evaluations, we concluded that infiltration uniformity was poor for all of the medium and heavy textured fields studied in the Imperial Valley.

The same trend of relative salinity increasing towards the top of the profile with distance from the head to the tail of the field previously described for the medium and heavy textured, sugar beet fields was also observed in the analogous alfalfa fields. While no bed/furrow patterns existed in the border-flooded alfalfa fields, they did in the furrow-irrigated alfalfa fields, and these patterns were essentially the same as those previously described for the sugar beet fields. These data, as well as the rest of the results obtained in the other five alfalfa fields studied, are not presented since their patterns and trends are similar to the data already presented.

TABLE 2. Differences in Irrigation Water Salinity (dS/m) from Head to Tail of Run

Date (1)	LE* (2)	LE + 5* (3)	LE + 15* (4)	LE + 30* (5)
(a) Sugar beets				
Light soil				
3/8	0.12	0.09	0.08	0.09
4/8	0.18	0.18	0.17	0.16
11/23	0.12	0.07	0.08	0.07
Medium soil				
2/17	0.42	0.34	0.25	0.23
5/12	0.54	0.30	0.27	0.25
9/14	0.95	0.21	0.13	0.09
Heavy soil				
2/24	0.91	0.93	0.91	0.86
11/5	1.37	0.56	0.52	0.50
(b) Alfalfa—border irrigated				
Light soil				
3/22	0.41	0.20	0.22	0.20
7/13	0.48	0.22	0.05	0.05
8/20	0.41	0.18	0.11	0.10
Medium soil				
3/11	0.33	0.01	-0.04	-0.05
Heavy soil				
3/17	0.18	0.11	0.08	0.03
7/10	2.73	0.98	0.86	0.48
8/17	1.31	0.78	0.51	0.40
(c) Alfalfa—furrow irrigated				
Light soil				
3/10	0.12	0.10	0.08	0.08
7/14	0.40	0.20	0.15	0.10
8/20	0.33	0.19	0.07	0.07
9/20	0.40	0.21	0.14	0.11
10/20	0.95	0.09	0.05	0.01
Medium soil				
3/11	0.27	0.19	0.17	0.16
7/14	0.40	0.14	0.11	0.10
8/20	0.29	0.13	0.10	0.10
9/20	0.27	0.12	0.09	0.09
10/20	0.31	0.14	0.11	0.10
Heavy soil				
7/23	0.87	0.23	0.21	0.19
8/15	1.78	0.87	0.73	0.70

*LE = leading edge and + indicates minutes following passage of the leading edge.

Water Measurements

Water sample data from the tail end of each field are shown in Table 2. These data are given in terms of the increases in electrical conductivity observed in the tailwaters, with respect to the applied irrigation water, in the LE and at 5, 15, and 30 min after the runoff had reached the end of the field.

The EC of the LE of the tailwater was always higher than that of the irrigation water and the amount of the increase was, in general, substantially more in the case of the heavier textured soils. For the latter soils, the EC of the LE of the tailwater was double or more that of the irrigation water. The analogous increase for the medium textured soils was usually intermediate between that of the light and heavy textured soils and was somewhat more variable in this behavior. The EC of the tailwater collected 5 min after the passage of the LE was typically substantially lower than that observed in the LE and was relatively constant or slowly decreasing thereafter. For example, on July 10 the EC of the initial runoff from a heavy textured soil, border-flooded alfalfa field was 2.73 dS/m higher than the water applied to the field. Although the EC of the subsequent runoff decreased with time, the increase in EC of the tailwater compared to the irrigation water was 0.98, 0.86, and 0.48 dS/m after 5, 15, and 30 min of runoff, respectively. For the heavy textured soils, the relative increase in the EC of the tailwater from the furrow-irrigated fields was often still very high (~ 0.5 dS/m or greater) after 30 min of continuous runoff.

The amount of salt pickup in the tailwater tended to increase over the irrigation season, especially in the case of the heavy textured soils and the border-irrigated alfalfa field. For the latter soil/field, very little pickup occurred in the March irrigation, whereas very high increases in EC were observed in the July and August irrigations. We speculate that these differences in seasonal effect are caused by the drier and more cracked conditions of the soil existing during the summer period.

CONCLUSIONS

Salinity conditions observed in the selected irrigated fields and associated tailwaters of the Imperial Valley were consistently related to soil type, as were the spatial trends of soil salinity within and across the fields. Salinity increases observed across the fields with heavy textured soils show that irrigation/leaching is markedly nonuniform across such fields, possibly reflecting the major attempt in the Imperial Valley in the recent past decade to reduce irrigation runoff, as well as the phenomenon of lateral solute transport. The magnitude of the salinity levels observed in the medium and heavy textured soils, especially in the lower sections of the selected fields, would be expected to result in substantial losses in alfalfa yield and in significant losses in the yields of sugar beets and other such relatively salt-tolerant crops. The excessive levels of salinity in the lower sections of the fields with heavy textured soils indicate insufficient water application/leaching is being achieved in these areas/fields with prevalent management practices to achieve optimum crop production.

The concentration of salt in the irrigation water increased as it flowed across the field. The increase, however, was much greater for the heavy textured soils, which exhibit large cracks and fractures. We conclude that substantial amounts of salt can be picked up by such lateral flowing water from highly cracking soils and discharged in the tailwater, though the actual amounts could not be quantified in this study since the runoff volumes were not determined. This inference is supported by the very large increases observed in the tailwater ECs, as compared to the EC of the applied water. Increases in EC of 0.5 dS/m or more were almost always observed in the tailwaters emanating from heavy textured soils. Such increases in EC

cannot be explained by evaporation of the water as it flows across the field.

The average profile salinities of the heavy textured Imperial Valley soils were always considerably higher in the tail end portions of the fields compared to the upper sections, and the salinity levels were proportionally higher in the shallow soil depths in the tail end of the fields compared to the upper end. While absolute levels of salinity were always higher in the heavy textured soils compared to the light textured soils, accumulations of salt were not found within the beds of the former furrow-irrigated soils as they were in the analogous light textured ones. These data imply that, as the result of cracking, the salts that otherwise would be expected to accumulate in the beds have been removed as the irrigation has flowed through the beds via the network of fractures and cracks that form during the drying of such heavy textured soils between irrigation events. Whereas classical two-dimensional distributions of salinity were observed in the furrow/bed environment of the light textured soils, only one-dimensional patterns were observed for the heavy textured soils. The fact that salinity increased more rapidly in the upper part of the soil profile compared to the lower sections of the fields of heavy textured soils suggests that significant horizontal salt transport occurred from the head to the tail of such fields.

Thus prevalent concepts of salt movement and leaching described in typical textbooks do not apply to highly cracking soils—certainly not those that dominate the Imperial Valley of California. Similar heavy textured swelling/cracking soils are found in the many other irrigated lands of the world, such as the Nile Delta of Egypt. The leaching patterns of such soils are dictated by the dynamic flow of water in the network of cracks that exist within and throughout the beds. The water that "drops" into the cracks moves horizontally at the bottom of the cracks, gradually filling up to the surface. This process, over time, causes a horizontal and upward transport of salt across the field. The salinity assessment technology of Rhoades and colleagues used in this study is well suited to establishing the levels and patterns of soil salinity within soil profiles and fields and to the evaluation of the adequacy/suitability of irrigation/drainage management of fields with respect to salinity control and to the evaluation of irrigation uniformity. A complementary bromide tracer study undertaken along with

this study confirms these conclusions and is reported elsewhere (Shouse et al. 1997).

APPENDIX. REFERENCES

- Lesch, S. M., Strauss, D. J., and Rhoades, J. D. (1995a). "Spatial prediction of soil salinity using electromagnetic induction techniques. 1: Statistical prediction models: A comparison of multiple linear regression and cokriging." *Water Resour. Res.*, 31, 373-386.
- Lesch, S. M., Strauss, D. J., and Rhoades, J. D. (1995b). "Spatial prediction of soil salinity using electromagnetic induction techniques. 2: An efficient spatial sampling algorithm suitable for multiple linear regression model identification and estimation." *Water Resour. Res.*, 31, 387-398.
- Lesch, S. M., Rhoades, J. D., Lund, L. J., and Corwin, D. L. (1992). "Mapping soil salinity using calibrated electromagnetic measurements." *Soil Sci. Soc. Am. J.*, 56(2), 540-548.
- Lesch, S. M., Rhoades, J. D., Strauss, D. J., Lin, K., and Co, M. A. A. (1995c). "The ESAP user manual and tutorial guide version 1.0." *U.S. Salinity Lab. Res. Rep. No. 138*.
- Maas, E. V. (1990). "Crop salt tolerance." *Agricultural salinity assessment and management*, K. K. Tanji, ed., ASCE, New York, N.Y., 262-304.
- Reeve, R. C., Pillsbury, A. F., and Wilcox, L. V. (1955). "Reclamation of a saline and high boron soil in the Coachella Valley of California." *Hilgardia*, 24, 69-91.
- Rhoades, J. D. (1992a). "Recent advances in the methodology for measuring and mapping soil salinity." *Proc., Int. Symp. on Strategies for Utilizing Salt Affected Lands*, 39-58.
- Rhoades, J. D. (1992b). "Instrumental field methods of salinity appraisal." *Advances in measurement of soil physical properties: Bringing theory into practice*, G. C. Topp, W. D. Reynolds, and R. E. Green, eds., 231-248.
- Rhoades, J. D. (1993). "Electrical conductivity methods for measuring and mapping soil salinity." *Adv. in Agronomy*, 49, 201-251.
- Rhoades, J. D., Kandiah, A., and Marshall, A. M. (1992). "The use of saline waters for crop production." *FAO Irrig. & Drain. Paper No. 48*, Rome, Italy.
- Rhoades, J. D., Manteghi, N. A., Shouse, P. J., and Alves, W. J. (1989). "Estimating soil salinity from saturated soil-paste electrical conductivity." *Soil Sci. Soc. Am. J.*, 53(2), 428-433.
- Shouse, P. J., Lelsey, J., Fargerland, J., Shouse, J. A., Burch, S. L., Oster, J. D., Lozano, E., Rhoades, J. D., and O'Halloran, T. (1997). "Salt transport in soils of various shrink-swell properties: Bromide tracer studies." *J. Irrig. and Drain.*, ASCE, 123(5).
- Zimmerman, R. P. (1981). *Soil survey of Imperial County, California, Imperial Valley area*. USDA, Soil Conservation Service, Riverside, Calif.

Lieutenant Colonel Carl Andrew Lewke, U.S. Marine Corps
68490 Peladora Road
Cathedral City, California 92234

February 14, 2002

Resource Management and Planning Department
ATTN: Elston Grubaugh
Imperial Immigration District
P.O. Box 937
Imperial, California 92251

Dear Ms. Grubaugh:

C4-1

I am a Coachella Valley homeowner. I am forwarding this correspondence to your office to formally register my opposition to the Imperial Irrigation District's proposed plan to transfer water to San Diego and the Coachella Valley. The scientific evidence clearly indicates that such a transfer will trigger an ecological disaster in the Salton Sea; the area will no longer serve as a major fishery and bird habitat. Additionally, the shrinkage of the Sea will most likely create problems for the entire Coachella Valley in terms dust storms and odors.

C4-2

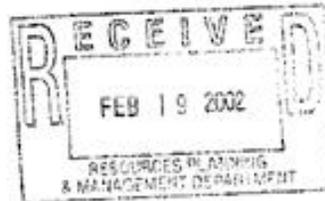
C4-3

I take my young daughters to the Salton Sea coastline at the Mecca State Park on a regular basis to observe the wildlife and pristine environment. In my opinion, it would be the height of irresponsibility to sacrifice the Salton Sea in an effort to obtain new water sources. I respectfully submit that other options must be considered.

Sincerely,



Carl Andrew Lewke



Letter - C4. Signatory - Carl Andrew Lewke.

Response to Comment C4-1

In the absence of the Proposed Project, the salinity of the Salton Sea is projected to continue to increase with consequent changes in the ecological dynamics of the sea. Water conservation and transfer under the Proposed Project would accelerate the occurrence of these changes but would not result in different effects than would ultimately occur in the absence of the Proposed Project. Implementation of the Habitat Conservation Plan component of the Proposed Project would avoid or mitigate the effects to biological resources of the Salton Sea that are attributable to water conservation and transfer. See Master Response for *Biology—Approach to Salton Sea Habitat Conservation Strategy* in Section 9 of this Final EIR/EIS.

Response to Comment C4-2

Dust: Please refer to the Master Response on *Air Quality-Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 9 of this Final EIR/EIS.

Odors: As described in Section 3.11, Aesthetics, in the Draft EIR/EIS, the effect of the Proposed Project or Alternatives would be less than significant, because there will be ongoing objectionable odor episodes at the Salton Sea under Baseline conditions.

Response to Comment C4-3

Comment noted.

Apr. 1. 2002 2:18PM

Post-It* Fax Note	7671	Date	4-1-02	# of pages	▶
To	Laura Harnis	From	Elston Grubaugh		
Co./Dist	Ham Hill	Co.	IID		
Phone #		Phone #	760-339-9751		
Fax #		Fax #	760-339-9009		

P. 2/5

ACTION BY	
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March 27, 2002

31

✓ Bruce Ellis
 Environmental Resources Division
 U.S. Bureau of Land Management
 Phoenix Area Office
 P.O. Box 81169
 Phoenix, AZ 85069

Elston Grubaugh
 Resource Management and Planning Department
 Imperial Irrigation District
 P.O. Box 937
 Imperial, CA 92251

RE: Imperial Irrigation District and San Diego County Water Authority
 Water Conservation and Transfer Project

Dear Mr. Ellis and Mr. Grubaugh:

I have been following the Desert Sun's articles on the proposed Imperial Irrigation District and San Diego Water Authority Water Conservation and Transfer Project. I have also reviewed some of the information on IID's web site. Based on the comments in the Sun's Saturday, March 2, 2002 edition, I hope that the decision has not already been made to move forward with this project. My comments follow:

1. The Ecology of the Salton Sea

I realize that the sea was formed almost a hundred years ago by accident. The lake has been a part of California longer than most of us have been alive. It is an amazing and somewhat strange site like no other in California. It has become a natural environment for wildlife, which after nearly a century, have become dependent on its existence. The idea of allowing the Salton Sea to shrink seems to fly in the face of what most

Letter - C5. Signatory - Craig Smith.

Response to Comment C5-1

The mitigation of the impacts of water conservation and transfer on the Salton Sea has been an important focus of the HCP and the EIR/EIS. Since the release of the Draft EIR/EIS and HCP, IID has removed HCP Approach 1 from further consideration. The revised approach would avoid Project-related reductions in the elevation of the Salton Sea until the year 2030 by providing water to the Sea to offset reductions in inflow. This revised approach also would avoid an acceleration of the rate at which the Sea is becoming saline during that period. The duration over which water would be provided to the Sea (i.e., until 2030) was based on the anticipated period that fish would continue to persist in the Sea under the Baseline. See the Master Response for *Biology -- Approach to the Salton Sea Habitat Conservation Strategy* in Section 9 of this Final EIR/EIS. Providing water to the Salton Sea until 2030 will avoid impacts to fish-eating birds and other biological resources, and avoid precluding options for a possible Salton Sea restoration project in the future.

C5-1



Letter - C5
Page 2

C5-1

Californians and Americans want to see in environmental protection.

C5-2

Has anyone considered that instead of transferring the water to San Diego, it should be transferred to the Salton Sea? Once the sea has reached a predetermined level, any excess could be used to meet other priorities in drought years. With the addition of fresh water in the lake, it seems that the problem of high salt levels in the lake would be solved.

2. Health of the Residents of this Region

C5-3

I am a resident of La Quinta and a diabetic. Diabetes is a chronic disease that requires continuous monitoring of one's health. Exercise is a very important part of my daily routine. When we have dust storms, I cannot exercise and the immediate impact on my health is reflected in higher unsafe sugar levels. The long-term effect to a diabetic with poor control is heart disease, blindness, kidney failure and an assortment of other problems. Exercise is not a cure, but postpones many of these problems.

C5-4

The highest risk groups for diabetes are American Indians, Hispanics and senior citizens. Obviously, I am describing the population of our region.

C5-5

We already have significant air quality problems, i.e. dust. (See the Desert Sun, Saturday, February 9, 2002.) I can't imagine that any action compounding this problem would even be considered. I don't know how anyone with young children, older parents, friends or family with any type of illness would be in favor of the water transfer with the increased potential of dust storms from the shrinking Salton Sea. It also appears to me that this action will not only affect our region but also areas in Arizona and Mexico.

C5-6

If San Diego does not receive the water transfer, it will not suffer from the air quality (i.e. dust) problems that the desert

Response to Comment C5-2

The concept of transferring Colorado River water to the Salton Sea to dilute salinity levels presents several legal obstacles. Primarily, the Salton Sea has no water rights which would allow water to be transferred to the Sea. In addition, the Salton Sea Reclamation Act (1998, Public Law 105-372) specifically forbids the use of excess Colorado River flows for restoration purposes. The HCP-SS in the HCP provides for the delivery of mitigation water to the Sea to offset reductions in inflow caused by the Project (as compared to projected Baseline inflows).

Response to Comment C5-3

Please refer to the Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan and Health Effects Associated with Dust Emissions* in Section 9 of this Final EIR/EIS.

Response to Comment C5-4

In response to comments, the text of Section 3.15 has been revised. The changes are indicated in Section 3.15 of this Final EIR/EIS.

Response to Comment C5-5

Please refer to the Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 9 of this Final EIR/EIS.

Response to Comment C5-6

Please refer to the Master Response on *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 9 of this Final EIR/EIS.