



May 19, 2015

Dear Salton Sea Task Force:

Thank you for taking the time to speak with us about the important challenge you have been tasked with – identifying what the State of California and its partners can do to address the imminent crisis at the Salton Sea. As we discussed, we see a number of excellent opportunities for the State to meet its obligations under the Quantification Settlement Agreement (QSA), protect public and environmental health, and improve water reliability for Southern California.

We describe several key points and recommendations in the following:

- **Success at the Salton Sea is achievable and would generate a notable victory for the State.**
- **Success at the Salton Sea should be achieved over several phases, starting this year.**
- **Focused attention on the Salton Sea will benefit public health and environmental health.**
- **Planning for the next phases of work should begin now.**
- **Committing to fixing the problems at the Salton Sea will greatly improve water reliability for Southern California and the State as a whole.**
- **A governance structure for longer-term Salton Sea activities should build upon the consensus structure developed five years ago.**

While the challenges at the Salton Sea are immense, a key message should be that ***success is achievable***. Unlike most of the water-related ecosystem challenges facing California and the West generally, the more than 700,000 acre-feet of annual inflows that will continue to drain into the Salton Sea for the foreseeable future provide many opportunities to create successful wetland habitats and effective dust control measures, without diminishing the amount of water going to existing users and transfer beneficiaries. This can be accomplished by implementing a comprehensive habitat plan that addresses how water will be spread atop exposed lakebed in a way that controls dust, creates habitat, and does not preclude the development of renewable energy facilities. The Bureau of Reclamation/USGS 100-acre shallow wetland habitat near the Alamo River delta at the Salton Sea, active from 2006-2010, demonstrated that such habitats can be constructed in a timely manner and that they attract and sustain significant numbers and species of birds while minimizing or eliminating dust emissions.

A solution at the Salton Sea needs to coordinate actions to achieve five major, related goals:

1. protect public health by controlling dust,
2. efficient water use,
3. protect wildlife and biodiversity by preserving or creating habitat,
4. timely implementation, and
5. cost-effectiveness.

One of our groups initiated and has been engaged in the creation of a conservation planning effort at Owens Lake in the eastern Sierra since 2008. A stakeholder process was initiated to develop a plan for the entire lakebed of Owens Lake that abated dust, conserved habitat, and saved water. A blueprint is now in place that will provide a matrix of habitats to support the current bird populations while reducing the amount of water used at Owens Lake. Currently more than 90% of the dust that was emitted from the Owens Lake bed has been abated, and bird populations are rebounding. We can use this experience to prevent more serious dust problems at the Salton Sea while providing for important bird habitat.

***Public health and environmental health will benefit from focused attention to the Salton Sea.*** The impacts of both fine and coarse particulate matter from lakebed exposed as the Salton Sea shrinks will be felt region-wide. Local air districts should be included in efforts to address Salton Sea management and encouraged to coordinate efforts to reduce air pollution impacts from the Sea.

***Success at the Salton Sea can be achieved over several phases.*** In the very near term, the presence of existing funding, permits, plans, and authorization should be leveraged to quickly initiate construction of the State's Species Conservation Habitat (SCH) project. Similarly, the State should support the rapid implementation of the Red Hill Bay project, using existing funding and working with the federal Bureau of Reclamation to facilitate construction and coordination with federal regulators. Together, these two projects will create more than 1200 acres of new wetland habitat at the Salton Sea. Expediting the implementation of these two projects would be a welcome demonstration of the State's commitment to Salton Sea actions, requiring little in the way of new state funding.

***Planning for the next phases of work should begin now.*** Work should begin now to plan the expansion of the SCH within its existing permitted footprint so that the next phase may be initiated immediately upon completion of the first phase. Coordination with the Imperial Irrigation District (IID) on a master planning document and permit for the implementation of their Salton Sea Restoration and Renewable Energy Initiative would enable the rapid implementation of additional habitat and air quality management projects atop exposed Salton Sea playa, again reducing lag times between completion of one phase and initiation of the next. The strong commitment and coordination of various state agencies would expedite project implementation and demonstrate the state's interest in protecting the Salton Sea and the health of those in the airshed.

Such ***state activity would improve water reliability for Southern California and for the state as a whole.*** Meeting existing state obligations would ensure the delivery of more than 200,000 acre-feet

of high-reliability Colorado River water to Southern California, reducing pressure on the Bay-Delta and northern California supplies. Such activity would provide assurance that state commitments to protect environmental resources are reliable going forward, potentially facilitating transfer agreements among other parties in California to further strengthen water reliability within the state.

Committing to ***developing a credible governance structure*** would reinforce such assurances. We encourage you to begin this process quickly by building on the agreement of a partnership between the Salton Sea Authority and Natural Resources Agency as embodied in Assembly Bill 71 (Perez 2013) and expanding it to include a format similar to that described in Senate Bill (SB) 51 (Ducheny 2010). We have attached SB 51 as enacted, as background. As you may recall, Salton Sea stakeholders worked together for more than two years to negotiate a preferred governance structure. The Salton Sea Restoration Council was never staffed and was terminated a year later, never having convened. We urge you to revive the Council, but to configure it more closely to the membership outlined in earlier versions of SB 51 (also attached) in which there was more balance between the local and State representatives instead of the final version of the council, which had a disproportionate number of State representatives. We believe that reviving the Council as initially configured would save months of duplicative discussions and would create a viable forum for determining a longer-term, holistic Salton Sea project that includes habitat, air quality management, renewable energy, and recreational components that can be phased in over the next decade or more, as well as increased accountability to ensure that planning and work proceeds expeditiously at the Sea.

We also recommend that the Task Force work with the Department of the Interior to draft an MOU that documents joint interests in moving forward, including a coordinated plan to develop a strategy for addressing state and federal permitting and environmental compliance requirements. In order to ensure the expeditious implementation of much-needed habitat and air-quality projects at the Salton Sea, we encourage you to finalize this MOU and begin work on the coordinated plan by the end of this year.

While the Salton Sea has been widely regarded as a conundrum, the reality is that the solutions for the Sea actually are relatively straightforward and do not require unproven or wildly creative schemes. We urge you to focus on the suggestions described above as you formulate your recommendations to the Governor.

If these steps are taken, it is not unreasonable to expect that in late 2017, as the QSA mitigation water delivery requirement winds down, state officials could host a dedication ceremony for the completion of more than a thousand acres of shallow wetland habitats at SCH and Red Hill Bay and the initiation of additional air quality management and additional habitat projects, while highlighting the ongoing work of a Salton Sea Restoration Council plan for the next phases of work at the Sea. This kind of event and progress would underscore the State's commitment to protection of public and environmental health while upholding the QSA, guaranteeing long-term water reliability for Southern California and contributing to the Governor's legacy of a more resilient water system and improved environment.

We look forward to working with you as you develop your recommendations and expedite implementation of Salton Sea projects, and stand ready to provide you with any additional information. Thank you again for meeting with us.

Sincerely,



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