

**Testimony of Kim Delfino, California Director, Defenders of Wildlife
Before the Little Hoover Commission
Public Hearing on the Salton Sea
Thursday, June 25, 2015 - 9:00 a.m.
State Capitol – Room 437**

On behalf of Defenders of Wildlife (“Defenders”), I want to thank you for the opportunity to testify before the Little Hoover Commission (“Commission”) on the issue of the Salton Sea. The Salton Sea is one of the most important wildlife areas in California and is currently poised on the brink of disaster. There is still an opportunity to protect the values of the Salton Sea and the surrounding communities. However, if inaction continues at the Sea, this area will become an environmental, public health and economic disaster area within only a few years.

As discussed more fully below, Defenders has worked on the issue of the Salton Sea since 2001 as part of our mission to protect all wild animals and plants in their natural communities. To this end, Defenders employs science, public education and participation, media, legislative advocacy, litigation and proactive on-the-ground solutions in order to prevent the extinction of species, associated loss of biological diversity, and habitat alteration and destruction. Defenders is a national environmental organization with more than one-million members and supporters in the U.S., including more than 160,000 in California.

Below are my responses to the Commission’s questions:

1. *How Defenders of Wildlife became involved in the Quantification Settlement Agreement negotiations and what the organization envisioned then as an eventual outcome for the sea.*

Defenders became involved in the Salton Sea issue in 2001 when during the last weeks of the Legislative Session California Resources Secretary Mary Nichols convened a few meetings of interested parties to discuss pending legislation involving the proposed Imperial Irrigation District (“IID”) water transfer, which was a key part of the Quantification Settlement Agreement (“QSA”). The legislation sought to exempt the water transfer from the California Endangered Species Act and the fully protected species provisions in the Fish and Game Code (see e.g., Fish and Game Code § 3511). The water agencies argued that this legislation was needed in move the water transfer forward and finalize the QSA in time to meet the December 31, 2002, deadline set forth in the Interim Surplus Guidelines (“ISG”). If the ISG deadline was not met, California would be immediately reduced down to its original allocation of 4.4 million acre feet (“MAF”). Not too surprisingly, the conservation community rejected the request to exempt the IID transfer from state environmental law.

For the rest of 2001 into early 2002, the water agencies moved forward in preparing their environmental documents for the IID transfer and shifted their attention to the State Water Resources Control Board (“SWRCB” or “Board”). On February 5, 2002, the Board issued a Notice of Public Hearing requiring all interested parties to file a notice of intent to appear and designate witnesses. From April 22, 2002 through July 16, 2002, the SWRCB held fifteen days

of public hearings. Defenders of Wildlife, Audubon, the Pacific Institute, and other concerned organizations participated in these hearings, providing evidence and testimony about the environmental problems created at the Salton Sea by the proposed water transfer.

On September 26, 2002, the SWRCB issued a draft order in which the Board acknowledged the impacts of the water transfer on the Salton Sea ecosystem. Unfortunately, the SWRCB provided only a 15 year window in which the Sea was to experience no harm from the transfer. The Board finalized its order on December 20, 2002, and issued a Notice of Determination, pursuant to the California Environmental Quality Act, on December 24, 2002.

Despite the SWRCB's ruling, the water transfer was not finalized by the end of 2002 due to significant issues raised within the Imperial Valley over the impacts of fallowing in order to deliver "mitigation" water to the Sea and who would be responsible for any additional mitigation costs after the 15 years of water ceased to be delivered to the Sea. Once California failed to meet its deadline, the Secretary of the Interior moved to cut back California's 2003 water allocation by 600,000 acre-feet under the terms of the ISG. The effort was put on hold when IID received an injunction stopping the cutbacks.

In early 2003, the water agencies and the Davis Administration turned their attention to a legislative solution to satisfy all of the parties involved in the water transfer. After more than nine months of intense negotiations, in which Defenders of Wildlife participated extensively, an agreement was reached. The state of California agreed to serve as the "insurance policy" for the Sea and its communities by becoming the financial backstop should the \$133 million in mitigation fund not be enough to mitigate for the impacts of the water transfers on the Salton Sea. The Davis Administration also agreed to direct the Natural Resources Agency to take the lead in coming up with a plan for a more sustainable Sea. These commitments were reflected in a trio of bills that were signed by the Governor at the end of September 2003 and inked into the QSA agreement, which was signed in October 2003.

The trio of bills were Senate Bill ("SB") 277 (Senator Denise Ducheny – San Diego), SB 317 (Senator Sheila Kuehl – Santa Monica) and SB 654 (Senator Mike Machado – Linden). As a package, these bills were intended to protect the Salton Sea for 15 years by requiring that IID provide mitigation water to the Sea so that there was no material increase in salinity at the Sea during that time. Another critical part of this deal was the commitment by the state of California to assume full liability for impacts at the Sea if a restoration plan fails and in the event the cost of the impacts from the transfer exceeded the \$133 million cap on liability costs in the Quantification Settlement Agreement.

SB 277 (Ducheny) created the Salton Sea Restoration Act that states that the restoration shall be based on a preferred alternative developed by a restoration study. (Fish and Game Code § 2931(b)). SB 317 (Kuehl) set forth the restoration study process. The Secretary of Resources, in consultation with the Department of Fish and Wildlife ("DFW"), Department of Water Resources ("DWR), Salton Sea Authority ("SSA"), appropriate air quality districts, and the Salton Sea Advisory Committee ("SSAC"), shall undertake a restoration plan to determine a preferred alternative for the restoration of the Salton Sea ecosystem and the protection of wildlife dependent on that ecosystem. (Fish and Game Code § 2081.7(e)). DWR was the lead agency in

the restoration effort on the behalf of the Secretary. Twenty million dollars of Proposition 50 funding was allocated to DWR to pay for this planning process. Finally, SB 654 made certain findings regarding how this transfer satisfied California Water Code, and it set forth the various funding schemes for funding the restoration of the Sea. The amount of funding potentially available for restoration of the Sea totaled nearly \$300 million.

Throughout the QSA negotiations, legislative process, and SWRCB hearing, the question was asked: What constitutes restoration at the Salton Sea? Not surprisingly, there were a variety of definitions depending upon which interest you represented. If you represent the local communities surrounding the Sea, restoration of the Sea would include significant economic development to revitalize an economically depressed area. This would require creating a Sea with features that would attract builders along with home-buyers and vacationers.

If you represented the conservation community, restoration would include improving the Sea as a resource for fish and wildlife and addressing many of the public health issues associated with the Sea and its tributaries, including improving water quality and ensuring no impact to air quality. Indeed, the thinking was that if some kind of “restoration” plan could be agreed upon and started to be implemented before 2017, these projects could also serve as helping to meet the State’s obligation to provide a financial backstop for full mitigation of the water transfer’s impacts on the Sea.

More specifically, at the time, Defenders and our partners believed that the agreements reached in the water transfer/QSA deal meant that the following outcomes would occur at the Sea during the 15 year “mitigation” water window:

- The restoration plan would ensure that the Salton Sea ecosystem continued to support the diversity and comparable population size of bird species. In addition, the restoration plan would provide for improved conditions for bird species, including addressing causes of bird disease.
- The Salton Sea ecosystem would support a thriving and sustainable fishery as well as provide habitat for the endangered pupfish.
- The Salton Sea ecosystem would continue to maintain its exceptional recreational opportunities, including birding, hunting, and fishing.
- The restoration plan would be consistent with a thriving agricultural economy in the Imperial and Coachella Valleys.
- The restoration plan would address water quality issues at the Sea and in its tributaries, and would build upon current TMDL efforts.
- The restoration plan would not contribute to any decline in air quality in the Imperial and Coachella Valleys.
- The restoration plan would attempt to leverage opportunities for providing economic stability for the communities in the Salton Sea ecosystem.

As the restoration process continued into the 2007, Defenders and our partners became alarmed at the California Natural Resources Agency’s preferred alternative. An \$8.9 billion plan that resulted massive infrastructure and expensive details seemed to be unrealistic and could be a barrier to any activity occurring at the Sea. We feared at the time that such a large and expensive

plan would fall flat at the Legislature and serve as a roadblock for moving forward expeditiously to address the inevitable impacts of the water transfer on the Sea. Unfortunately, our fears have been realized as relatively little progress has been made by the Resources Agency toward addressing the massive environmental problems soon to be visited on the Sea and its communities. Further, there has been no agreement by the State or Legislature to a long-term plan at the Sea.

2. *What the majority of stakeholders believed the state had committed to when it promised to be a financial backstop and assume mitigation costs above \$133 million, as well as what stakeholders believed the state committed to in terms of restoring the sea. Please discuss the significance of those commitments in brokering a way forward for what is described as the largest farm to urban water transfer in the nation and what it signified for the future of the Salton Sea.*

As discussed above, while the SWRCB process resulted in the commitment of 15 years of mitigation water, the deal was not sealed until the Davis Administration committed to cover any shortfall in mitigation funding should the \$133 million committed by the water agencies prove to be too little to mitigate for the full impacts of the water transfer. As IID and the conservation community has testified and written about extensively since the deal was struck, it was the Davis Administration's financial backstop commitment along with the commitment to lead the restoration effort at the Sea that finally provided all of the parties with sufficient reason to support the transfer and the signing of the QSA. That commitment by the State is reflected in Section 9.2 of the QSA¹ and was upheld by California Court of Appeal in *In re Quantification Settlement Agreement Cases* (2011), 201 Cal.App.4th 758,789. This understanding also been detailed in a January 24, 2008 Legislative Analyst Office report, "Restoring the Salton Sea," as well as in a November 2013 report by the California State Auditor, "Salton Sea Restoration Fund: The State Has Not Fully Funded a Restoration Plan and the State's Future Mitigation Costs Are Uncertain." (Report 2013-101). Finally, Assembly Bill ("AB") 71 (Perez) reaffirmed these obligations.

¹ Section 9.2 of the QSA states that "[t]he State is solely responsible for the payment of the costs and liability for Environmental Mitigation Requirements in excess of the Environmental Mitigation Costs Limitation. The amount of such costs and liabilities shall be determined by the affirmative vote of three Commissioners, including the Commissioner representing the State, which determination shall be reasonably made. The State obligation is an unconditional contractual obligation of the State of California, and such obligation is not conditioned upon an appropriation by the Legislature, nor shall the event of non-appropriation be a defense."

3. *How local, regional and state bodies have envisioned the sea and its surroundings at various times across the past 15 years. Please describe the cycles of varying often competing visions, governance ideas, and proposed solutions – from a fully restored sea and dike to the \$8.9 billion state plan to the Sea of Cortez vision – that have risen and fallen and ultimately contributed to the lack of action. What challenges face the current visions of desalinization and renewable energy at the sea?*

At the beginning of the Salton Sea restoration planning process in the mid-2000s, there was a push by the Salton Sea Authority and other local and regional interests to come up with a solution for the Sea that would essentially try to return the Sea to some semblance of its past hey-day. These full sea or partial sea solutions focused on “freshening” up the Sea’s salty waters to return it to more of a marine environment for fish, stabilizing the shoreline so that housing developments and golf courses could be built along the Sea’s shores, and building dams or other large infrastructure to create a large recreational lake for fishing and other water sports. Indeed, the Resources Agency’s final Preferred Alternative essentially attempted to satisfy these goals, but at the prohibitive cost of \$8.9 billion, this plan went nowhere.

Another popular idea to save the Sea was to pipe in water from the Gulf of California. Indeed, about a decade ago, the U.S. Bureau of Reclamation examined options for pipelines or canals to pump water about 100 miles between the Gulf of California and the Salton Sea, and concluded the idea had “low feasibility,” in part because the costs were estimated to run between \$15 billion and \$38 billion. The Resources Agency also reviewed this idea as part of the restoration planning process, but abandoned it as too costly. Finally, in a 2004 report, the Salton Sea Authority concluded that piping in water would be “impractical.” This idea has continued to bounce back. In 2010, the consulting firm Utility Solutions Group proposed a “sea-to-sea” restoration plan that would import seawater from the Sea of Cortez. This plan suffers from the same problems as the other “sea to sea” concepts: too complicated, too expensive, and too difficult to navigate the process between two different countries.

The use of desalinization plants has also been discussed and is similar to the “sea-to-sea” concept of using marine water to freshen up the Sea. Like the “sea to sea” concepts, desalinization suffers from cost and technical problems. For example, in order to combat the high salinity of the Sea, it has been estimated that one would need to build seventeen desalinization plants with each plant producing up to 10 million gallons a day at the Sea.² The desalinization plant in Carlsbad is expected to cost \$1 billion to produce 10 million gallons of water per year. With that estimate, it would appear that it might cost more than \$17 billion to build enough desalinization plants at the Sea. Thus, the desalinization idea does not appear promising. Further, if such plants are built and are producing fresh water, it does strain the bounds of credulity to assume that other water districts would be fine with delivering fresh water to the Sea instead of to the urban, agricultural and industrial sectors of California.

² Ian James, *The Desert Sun*, “In unorthodox campaign for Salton Sea, activist looks to Mexico,” March 14, 2014.

Governance of any final plan also posed a dilemma for those working on the Salton Sea. The local and regional interests not surprisingly wanted to control whatever plan that was to be implemented as well as the funds for the plan. Also not surprisingly, the state was not eager to cede state funds over to local control. Thus, as discussed more fully below, there was no real agreement on a governance structure for any final plan.

Ultimately, the problem with the full sea and partial sea proponents was that they were so focused on pursuing the big, expensive plans that they were not interested in anything that could be considered interim or incremental because they believed that to pursue a scaled-down, more practical solution would give the state an excuse not to do more. Without consensus on what kind of plan to pursue at the Sea or on how a governance body was to be structured, gridlock reigned for years. Further, with the state realizing the breadth and cost of their commitment at the Sea, the state was in no hurry to assume greater leadership or resolution at the Sea because to do so would incur great financial liability. So, with no consensus on a plan or governance and no leadership by the State, a solution for the Sea has failed to materialize, and will not do so unless the state shows more leadership and urgency to solve this problem, and the local and regional interests become more pragmatic about a Salton Sea solution.

While a fully formed solution for the Sea has not sprung forth yet, there is movement at the Sea on projects that could inform a larger sea solution. The U.S. Geological Survey (“USGS”) built shallow water habitat projects near the Sea, demonstrating that those projects can work. Unfortunately, USGS ran out of funding and had to dewater those ponds. IID, working with the U.S. Fish and Wildlife Service, is close to breaking ground on its Red Hill Bay project, demonstrating how to build shallow water habitat at the Sea. DFW and DWR are also close to breaking ground on their Species Conservation Habitat Phase One, which would demonstrate how to build deeper water habitats for the benefit of fish eating birds. The Torres Martinez tribe is working on a project to demonstrate the feasibility of using geo-tubes as berms for construction of ponds. In addition, IID has been working with partners on a “Salton Sea Incremental Habitat Plan” that knits together the aforementioned projects with a vision of incrementally building projects to address air quality and habitat concerns as the Sea recedes.

Finally, renewable energy, particularly geothermal energy, has been discussed as potentially providing some part of the solution at the Sea – in the form of covering up exposed playa with projects and/or generating a revenue stream to be used to help pay for additional mitigation projects at the Sea. While Defenders fully supports additional renewable energy projects at or near the Sea, there are some challenges still to be overcome. First, it is not clear that solar projects can be built near or on exposed playa. Dust can be a considerable problem for these projects. In addition, while geothermal is a “base” power – similar to natural gas – it currently is not as cheap as natural gas and therefore the utilities are not as interested in buying geothermal power. One only needs to look at the example of what type of energy largely replaced the closed San Onofre nuclear power plant: natural gas not geothermal energy. Finally, while there appears to be still some capacity on transmission lines in the Imperial Valley, there is not enough

transmission capacity to fully develop the up to 2,500 megawatts of potential geothermal energy near the Salton Sea. While there are obstacles to renewable energy development at the Sea, there is evidence of progress: IID has kicked off its Salton Sea Restoration and Renewable Energy Initiative; Imperial County is finishing an update to their renewable energy and transmission element in their general plan; the Desert Renewable Energy Conservation Plan continues to move forward; and the Resources Agency provided funding to the Salton Sea Authority to contract with the National Renewable Energy Lab (“NREL”) to investigate the feasibility of renewable energy development as part of a solution at the Sea. To date, the NREL report has not been finalized and released.

4. *Please describe how wildlife dependent on the Salton Sea utilize the region’s entire ecosystem and impacts of inaction on a receding sea on the wildlife. Please discuss Defenders of Wildlife’s preferred Salton Sea solutions, implementation timelines and impacts these solutions would have on the sea’s wildlife.*

The Salton Sea plays a vital role in sustaining California’s critically-important wildlife values. The following table, copied from the Resources Agency’s 2006 Programmatic Environmental Impact Report,³ lists many of the important bird species found at the Salton Sea, based on abundance or legal status. This tremendous avian abundance and diversity is the highest in California and the second-highest in the United States. Simply put, the Salton Sea provides incomparable, irreplaceable avian habitat, benefitting the people of California and the nation. In addition, the Salton Sea has been designated as a Globally Important Bird Area and one of the top 50 Climate Refugia Important Bird Areas by Audubon California.⁴

Table 1. Focal Bird Species and Criteria

SPECIES	CRITERIA
<i>Aechmophorous</i> spp. (Includes Clark’s and Western Grebes)	Greater than 10,000 birds counted on single survey (Shuford et al., 2002)
American Avocet	Greater than 10,000 birds counted on single survey (Shuford et al., 2002)
American White Pelican	DFG Bird Species of Special Concern Greater than 10,000 birds counted on single survey (Shuford et al., 2002)
Black Skimmer	DFG Bird Species of Special Concern; Service Birds of

³ California Natural Resources Agency (CNRA) (formerly, the California Resources Agency). 2006. *Salton Sea Ecosystem Restoration Program Draft Programmatic Environmental Impact Report*. Prepared by the California Department of Water Resources (DWR) and California Department of Fish and Game (DFG). Available at http://www.water.ca.gov/saltonsea/documents/draft_eir.cfm.

⁴ <http://ca.audubon.org/important-bird-areas-9>

	Conservation Concern - BCR 33 National Waterbird Conservation Plan (species considered Highly Imperiled or of High Concern)
Black Tern	DFG Bird Species of Special Concern
Black-necked Stilt	Greater than 10,000 birds counted on single survey (Shuford et al., 2002)
Brown Pelican	Federally endangered species State endangered species
California Gull	Greater than 10,000 birds counted on single survey (Shuford et al., 2002)
Cattle Egret	Greater than 10,000 birds counted on single survey (Shuford et al., 2002)
Double-crested Cormorant	DFG Bird Species of Special Concern; Greater than 10,000 birds counted on single survey (Shuford et al., 2002)
Dowitcher spp (Includes Long-billed and Short-billed Dowitchers)	Greater than 10,000 birds counted on single survey (Shuford et al., 2002)
Dunlin	U.S. Shorebird Conservation Plan species or subspecies (4-5 priority score)
Eared Grebe	Greater than 10,000 birds counted on single survey (Shuford et al., 2002)
Gull-billed Tern	DFG Bird Species of Special Concern; National Waterbird Conservation Plan (species considered Highly Imperiled or of High Concern) Service Birds of Conservation Concern - BCR 33
Least Bittern	DFG Bird Species of Special Concern
Long-billed Curlew	DFG Bird Species of Special Concern; U.S. Shorebird Conservation Plan species or subspecies (4-5 priority score)
Marbled Godwit	U.S. Shorebird Conservation Plan species or subspecies (4-5 priority score) Service Birds of Conservation Concern - BCR 33

Ring-billed Gull	Greater than 10,000 birds counted on single survey (Shuford et al., 2002)
Ruddy Duck	Greater than 10,000 birds counted on single survey (Shuford et al., 2002)
Snowy Egret	National Waterbird Conservation Plan (species considered Highly Imperiled or of High Concern)
Snowy Plover	DFG Bird Species of Special Concern; U.S. Shorebird Conservation Plan species or subspecies (4-5 priority score); Service Birds of Conservation Concern - BCR 33
Western Sandpiper	Greater than 10,000 birds counted on single survey (Shuford et al., 2002); U.S. Shorebird Conservation Plan species or subspecies (4-5 priority score)
Whimbrel	U.S. Shorebird Conservation Plan species or subspecies (4-5 priority score); Service Birds of Conservation Concern - BCR 33
White-faced Ibis	DFG Bird Species of Special Concern; Greater than 10,000 birds counted on single survey (Shuford et al., 2002)

Notes: DFG = Department of Fish and Game [now known as Department of Fish and Wildlife]; Service = U.S. Department of the Interior, Fish and Wildlife Service. Source: CNRA 2006 (App. C, Table C-1).

Sacrificing the Salton Sea is not an option. It provides habitat for more than 400 species of birds – approximately two-thirds of all bird species in the continental U.S. As a critical stopover on the Pacific Flyway, it is one of the most important locales for migratory birds in the Western United States. When the water transfer is fully in effect – *i.e.*, when the maximum amount of water is delivered to urban Southern California and less water is flowing to the Sea -- it will have major impacts on these species. The Sea's fish population will crash, eliminating food for birds – both those that live there, and those passing through. With this important habitat destroyed, migratory birds will have few options to rest and feed during their migration up and down the Pacific flyway.

Defenders of Wildlife has joined with the Pacific Institute, Sierra Club and Audubon California to articulate what we believe should be address in any solution at the Salton Sea. In a letter to the Governor's Salton Sea Task Force, dated May 19, 2015, our four organizations identified five major, related goals that should be included in any final plan:

1. protect public health by controlling dust,

2. use water efficiently,
3. protect species abundance and diversity by preserving or creating habitat,
4. be timely, and
5. be cost-effective.

In our letter, we provide the following additional details regarding these five goals as well as recommendations for implementation and governance:

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. This process should begin 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). Salton Sea stakeholders worked together for more than two years to negotiate a preferred governance structure in SB 51. The Salton Sea Restoration Council was never staffed and was terminated a year later, never having convened. The Council should be revived, but it should be configured more closely to the membership outlined in earlier versions of SB 51 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. 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 is proceeding expeditiously at the Sea.

The Salton Sea Task Force should work with the Department of the Interior to draft a Memorandum of Understanding (“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, this MOU should be finalized and work started 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. Forward movement as outlined above should provide us with an opportunity to avoid the worst of the impacts to the Sea’s wildlife as well as the communities that surround the Sea.

Thank you again for the opportunity to provide Defenders’ view on the lessons we have learned from the past 12 years and what should be done at the Salton Sea.