



IMPERIAL COUNTY FARM BUREAU

1000 Broadway, El Centro, CA 92243 • Tel: (760) 352-3831 • Fax: (760) 352-0232

January 16, 2007

Attn: Dale Hoffman-Floerke
Salton Sea PEIR comments
CA Department of Water Resources
Colorado River & Salton Sea Office
1416 9th Street, Room 1148-6
Sacramento, CA 95814

Comments on Draft PEIR for Salton Sea

Dear Ms. Hoffman-Floerke:

The Imperial County Farm Bureau, (ICFB), represents over 400 farmers in the Imperial Valley plus another 400 members who do not actively farm but are closely involved with agriculture. This response to the Draft PEIR for the Salton Sea by ICFB represents the thoughts and concerns for all of our members.

The Salton Sea is first and foremost, a repository for agricultural drain water for the farmers of the Salton Sea and has been that way since the 1920's when Presidents Coolidge and Harding proclaimed it to be an agricultural sump. This contribution of drain water is what has kept the Salton Sea alive for over 100 years while providing habitat for over 400 species of birds that are native to the area or travel through this region every year. These 400 species represent millions of birds that use the Salton Sea and the surrounding area during their yearly migration.

The surrounding agriculture, at both ends of the Salton Sea, is just as important to these birds as the Salton Sea itself. Hundreds of thousands of farm acres provide a vast array of food, water and habitat for the birds.

The Salton Sea also covers an ancient lake bed that has the potential to create dangerous dust storms. As the preferred restoration plan is chosen and the Sea begins to recede, it is important that the plan is capable of not only protecting the public health but the farm land from also from dangerous levels of dust that could

occur, including dangerous salt dust from the salt playas which is already beginning to form around the shore of the Salton Sea as it recedes. White salt clouds are rearing their ugly heads at the south end of the Salton Sea every time the wind exceeds 15 miles per hour and some crop damage has already occurred. The local population, living close to the Salton Sea, has been negatively affected by this toxic dust.

The ICFB believes some sort of early start air mitigation program, at no cost to the farm community, is essential and the State should exhaust all avenues available to them to help solve any air mitigation problems before they start.

On January 25, 2006 Al Kalin from the ICFB sent Secretary Chrisman a plan the ICFB believes will help reduce this terrible salt playa as the Salton Sea recedes. It can be found in the PEIR in Appendix H-3 Attachment 1, (Pages H-3-1-1 to H-3-1-3).

Hundreds of acres of exposed playa have already been reclaimed along the southeast side of the Salton Sea using this method. In these locations though, the dikes were made naturally. During the time the Salton Sea was at its highest elevation it created drifts of large barnacle shoals along the beach line near Davis Road on the southeast side of the Salton Sea. When the Sea receded the barnacles were left. The fresh water from IID drains, which drain directly into the Sea, was able to flow through the very porous barnacle shoal and into the sea without washing out the shoal. This flushed the salts from the barnacle shoal itself and allowed salt cedars to take root which further strengthened the shoals. Over the years silt and detritus reduced the porosity of the shoals and they became sturdy dikes. The water from the drains began to pond up behind these dikes forming shallow lagoons and the salt was slowly flushed from the soil and plants began to grow.

Today some of these areas are completely covered by cat-tails, bulrush, and phragmites with no open water left. These plants require fairly salt-free soil and water to grow. This proves the theory that building a dike out in the sea and backing fresh water up behind it will wash the soil of enough salt that plants will grow. Obviously it will not be salt-free enough to grow lettuce but the salt playas will be reclaimed enough that it will be possible to grow a much broader range of plants, much easier, to stop dust from moving than just salt grass, pickleweed or inkweed.

We need this idea in our air quality "toolbox". We can't depend on just using expensive sprinklers and emitters to grow salt grass on the exposed playa like they are doing in Owens Lake where per acre costs have been very expensive.

The Salton Sea is a massive heat sink which warms the wind blowing across it in the winter and cools the winds that blow across it in the summer. This phenomenon is vitally important to the agricultural economy of the Imperial

Valley. In the winter the air which is warmed as it blows across the Salton Sea keeps the crops from freezing. As a result this is the area where the first winter lettuce, the first broccoli, the first cauliflower, the first sweet corn, and the first melons come from that feed the nation. It is important that enough water remains in the south end of the sea to maintain this heat sink. The State should understand this important attribute and adopt a plan that allows for the continued existence of a southern body of water that would create this valuable heat sink.

The ICFB believes that Alternative Four, Concentric Lakes Plan, with modifications made recently by the farm group to include a saline habitat complex, is the plan which is preferred by the ICFB and meets all of the objectives needed for a preferred alternative. We urge the State to understand the attributes this plan provides and consider adapting these alternatives as important as they choose a preferred alternative.

Chapter 4 Comments

The ICFB believes Chapter Four does not take into account the reduced flows to the Salton Sea due to the Quantification Settlement Agreement, (QSA), cap and the implementation of various TMDLs. Both of these items will affect the amount of water that will ultimately flow into the Salton Sea.

The irrigation water used by Imperial Valley farmers was capped for the first time in history with the signing of the QSA meaning new challenges for farmers as they try to live under this cap. The ICFB believes this learning curve coupled with attempts to conserve water through conservation methods after year 2017 will lead to less water flowing to the Salton Sea.

Best Management Practices, (BMPs), for the silt TMDL have already been implemented by Imperial Valley farmers. It was discovered that while trying to clean up the drainage water leaving the farmer's fields so that it is clear, with no silt, the amount of drainwater is also reduced by 20% to 30%. The silt load is a direct result of the velocity of water in the farmer's drain. The act of reducing the velocity to reduce the amount of silt agitated and put into suspension by the drain water requires better management by the irrigator which in turn causes a reduction in the amount of total acre feet of drain water leaving the fields.

In determining future inflows into the Salton Sea modeling was used that determines the amount of inflow water by comparing past use history. The ICFB believes this is a fatal flaw and much less water will ultimately flow to the Sea. The preferred alternative must include attributes that will accept a broad range of flows over the 75 year project.

Chapter 5 Comments

The State has dropped inflows to the Salton Sea by 109,000 feet due to the CEQA concerns but the ICFB feels the State did not reduce this amount enough.

Comments on Inflow and Climate Assumptions for the No-Action Alternative

Inflows from Imperial Valley are estimated to be 724,000 AFY for the period 2018-2078 based primarily on the QSA reducing those flows from the approximately 1,029,000 AFY historical flow rates. The QSA EIR projects the greater portion of the 303,000 AFY reduction would result from a reduction in tailwater and delivery system losses. This result would still leave approximately 200,000 to 250,000 AFY of tailwater and delivery system losses.

Comments on Inflow and Climate Assumptions for the No-Action Alternative - Variability Conditions

The PEIR recognizes that additional reductions in agricultural returns flows can be expected due to implementation of TMDL regulations by CRWQCB. Potential changes in IID water needs estimates, reductions in applied irrigation rates if Colorado River salinity declines, improved water efficiency, changes in cropping patterns, conversion of agricultural lands to urban uses, and reduced availability of Colorado River water supplies.

Due to these factors, inflows from Imperial Valley under this section are estimated to decrease by an additional 109,000 AFY or 15% to 615,000 AFY. ICFB believes this would still leave between 100,000 and 200,000 AFY of tailwater and delivery system losses, depending on the sources from which the reductions are projected to come.

The PEIR appears to fail to recognize that other factors, such as changes in farming practices, availability of improved equipment and technology, efforts by farms to prevent criticism of and challenges to their farm water use practices, the need to meet standards imposed on farms to accomplish goals not directly related to tailwater quantity, re-use of seepage water for crop irrigation, and the availability of more economic methods of preventing and/or recovering delivery system losses, will likely contribute to further reduction, even elimination of remaining tailwater and delivery system losses.

It should be recognized that long before 2078 inflows from Imperial Valley could, and likely will, decrease an additional 100,000 to 200,000 AFY below the estimated 615,000 AFY.

In addition a challenge in our beneficial use of irrigation water from the Interior Department in the form of a 417 proceeding could also have a devastating effect on the amount of water entering the Salton Sea.

In January, 2003 political pressure from urban interests forced the Department of Interior to file a 417 action against IID claiming IID was not using its water beneficially and cut their entitlement by 350,000 acre feet per year. IID quickly brought suit to challenge the Department of Interior's action. This process was moving to the stage of appellate review by the Secretary when the QSA documents were executed in October of 2003, and the IID litigation and the government's 417 proceeding were thereafter dismissed as a part of the package of QSA settlements however there was nothing in QSA, or legislature which accompanied the QSA, that would prevent the Department of Interior of bringing action against IID again if enough pressure was brought to bear from urban interests.

For these reasons the ICFB believes the amount of water calculated by both the State DWR and IID, to flow into the Salton Sea for the next 75 years, is greatly exaggerated. The preferred alternative picked should be able to handle a broad range of inflows.

Chapter 6 Comments

The ICFB believes major information is missing from Chapter 6. There is no mention of the New River, Alamo River, or Imperial Valley Drains Silt TMDL currently being implemented. These three TMDLs are vitally important since they are key elements to the removal of silt from farm run-off. The reason silt is so important is because phosphorus is not water soluble and cannot move in the water without being attached to a clay particle. Phosphorus is the controlling nutrient that determines the amount of algae blooms in the Salton Sea. The CRBRWQCB set a goal of 50 percent reduction of silt for all three TMDLs over a 13 year period.

Farmers are participating in a voluntary compliance program of these three TMDLs to reduce the amount of silt leaving their fields. By reducing silt, phosphorus is also reduced which in turn causes a reduction in algae blooms in the Salton Sea.

The program has been so successful that after only three years of a 13 year program the farmers have reached their goal in the New River by reducing the silt by over 50%. In the Alamo River the silt was reduced by 38% and continues to decline. This tremendous achievement has reduced the amount of phosphate entering the Salton Sea by 20-30 percent.

The three silt TMDLs have been so successful the Imperial County ICFB's Voluntary Compliance Program was awarded the 2004 Governor's Environmental and Economic Leadership Award as well as the United States Federal Environmental Protection Agency's 2006 Environmental Award for Outstanding Achievement for the whole Western United States and Pacific Rim.

It has been mentioned by others that these three silt TMDLs may be the most successful TMDLs in California and possibly in the whole United States.

While others have been studying what to do to solve the problems at the Salton Sea, the farmers of the Imperial Valley have stepped to the plate and reduced phosphate entering the Salton Sea by a very significant amount.

Since there has been a significant reduction of phosphate entering the Salton Sea due to the implemented Silt TMDL's it is important to understand that any alternative like Alternative #3 and #4, that accept water directly from the New and Alamo Rivers without first dumping into the current high salt content / high phosphorus loads of the Salton Sea, will have a much lower amount of phosphate in the water column and therefore should show a significant reduction in algae blooms. Table 6-5 is therefore incorrect as it shows the benefits equally as less than significant.

Page 6-27 talks about the CRBRWQCB Draft Nutrient TMDL for the Salton Sea which identifies an annual phosphorous target of 35 $\mu\text{g}/\text{L}$ as measured in the Salton Sea. Since the development of this TMDL was halted with the signing of the QSA and there has been no action to adopt the target number of 35 $\mu\text{g}/\text{L}$. The ICFB feels it is inappropriate to list any target number until adopted by the local and state water boards.

The PEIR makes no mention of the significance of natural CO_2 vents along the south east side of the Salton Sea. It is important to note that CO_2 is used to accelerate the production of algae where it is commercially grown. The ICFB therefore believes shallow saline habitat complexes should not be situated in the southeast corner of the Salton Sea as it may lead to an acceleration of algae blooms.

Chapter 8 Comments

For all practical purposes the marine sport fishery in the Salton Sea has collapsed and no sports fish have been found in over two years. The PEIR has identified various habitats and compared various plans and their impact to wildlife and have shown how different changes would affect the wildlife should the species of sports fish be restocked.

The PEIR places great emphasis on the need for Desert Pupfish connectivity between different streams that flow into the Salton Sea. The ICFB questions if this is a good thing. If the entire Pupfish population were interconnected it might be possible for all of the fish to perish if a disease were to infect the population.

The weather in the Salton Sea Basin has seen a warming trend for the past 40 years. It no longer gets as cold during the winter as it once did and nowadays the water temperature of the Salton Sea seldom drops below 50° F. The scientists

associated with the PEIR have consistently said the species of tilapia in the Salton Sea have shown to be capable of surviving much lower temperatures in laboratory conditions. However in looking at past history, tilapia die-offs with the largest number of fish have consistently occurred in the winter when the water temperature was the lowest.

Therefore the ICFB believes that as the volume of the sea recedes the need for a forage fish other than tilapia should exist as an alternate forage fish if the tilapia population collapsed as a result of cold water.

Chapter 9 Comments

The estimated cubic yards of gravel needed for the Alternative #4 is far less than Alternative #7 and therefore would create less problems with air quality and pollutants associated with construction.

Alternatives such as #7 require literally, mountains of rock. This is a long term project which would create massive amounts of air pollution in the form of dust and emissions from the heavy equipment.

As a main dike is constructed in Alternative #7 it would take five years or more for the deposited rock to sink through the sediment, become stable, and create a firm base. This means Alternative #7 would take much longer to build before it could begin improving the quality of the Salton Sea. During this time the Sea would continue to recede and create even large air quality problems. Waiting for such a large dike to stabilize could create additional costs to maintain the portion of the dike already built.

One of the building structures for Alternative #4 is the use of Geo-tubes filled with localized material. There is no information in the PEIR as to the integrity of the structure or any data on long term viability of these geo-tubes. The ICFB sees this as a very viable alternative and would request that information on the use of the tubes be included in any final reports. Geo-tubes are used worldwide and we see no reason to assume that they would not work as a core for the dikes in Alternative #4 in the Salton Sea. Numerous offers have been made to state and federal engineers to travel to Holland where the Geo-tubes were invented but they have shunned the invitation. This action only creates more ignorance on the part of our state and federal engineers. Not only could the Geo-tubes be viewed in-place but our state and federal engineers could talk with the Dutch engineers that have used them on a daily basis for the past 25 years and get a better understanding of how Geo-tubes could be used successfully in the Salton Sea

Chapter 10 Comments

The ICFB believes the first priority of water should be used for dust control to keep air quality problems to a minimum. Alternative #4 has ample air quality

plans and the information was furnished to DWR but for some reason this information was not included in the published PEIR.

Because the dikes for Alternative #4 will be constructed with dredges there will only be dust generated when the finished dike is capped with gravel and rip-rap. In addition the dredges which will be used for Alternative #4 will be electrically powered, further decreasing the amount of air pollution. On the other hand Alternative #7 will create a tremendous amount of dust during construction. Not only will dust be generated but the hundreds of engines in the construction equipment will also add to the air pollution load.

The ICFB believes there is not enough information proved for micro-climate changes to adjacent agriculture land with the different alternatives. This is a very important issue and there is no reason to not address it properly because the DWR cannot figure out how to add it to the various models they use. This appears to be one of those common sense items that is easy for Imperial Valley farmers to grasp and understand but very difficult for scientists to make light off.

The ICFB believes the PEIR does an extremely poor job of who is liable for air quality mitigation. There is much confusion between DWR and the Imperial Irrigation District regarding:

- Who is liable for air quality mitigation
- Who pays for the mitigation in different situations
- From what source the funds come, that will pay for the mitigation

So far attempts to clarify this issue have only confounded the problem. IID and the DWR must quickly come to a consensus over this critical issue before the process can move forward.

The Salton Sea covers an ancient dry lake bed that has the potential to creating dangerous dust storms. As the preferred restoration plan is chosen and the Sea begins to recede, it is important that the plan is capable of not only protecting the public health but the farm land also from dangerous levels of dust that could occur, including dangerous salt dust from the salt playas which is already beginning to form around the shore of the Salton Sea as it recedes. The local population, living close to the Salton Sea, has already been negatively affected by this toxic dust. These white salt clouds which are rearing their ugly heads at the south end of the Salton Sea every time the wind exceeds 15 miles per hour have already caused crop damage near the Salton Sea. The PEIR does not even consider damage to crops from the salt dust blowing off the playas. This is a major oversight that needs to be addressed.

The ICFB believes there is a great need for some sort of early program to attack current problems on exposed playa around the Sea and not wait until the

permitting process has been completed. By working with IID and area farmers it is felt a plan could be developed to address this major problem.

On page 10-29 it is stated that crust is unstable only during the months of December through March on the playas around the Sea. The ICFB feels it could be a much longer period of time. There have not been enough studies done to gain an adequate understanding of the problem.

The PEIR reports that there are no emissions predicted at the north end of the Salton Sea therefore there is no need for dust control at the north end of the Sea however on the south end of the sea salt dust emissions have been noted and documented and there is a need for dust control in that area. In all probability there are equal emissions from salt dust at both ends of the Salton Sea but so far they are not as noticeable on the north end since the exposed playa is not as large as the north end. Once the Sea drops a few feet the ICFB believes there will be problems with salt dust blowing in the winter time.

The DWR staff is suggesting that under a chosen alternative the State is not liable for air quality mitigation issues until all permitting has been completed and the plan is actually under construction. The ICFB believes the State must assume liability for air quality mitigation and begin actively working to implement measures as soon as an alternative plan is chosen and before the permitting and construction process is completed.

Chapter 11 Comments

The PEIR ranked each alternative separately, and then ranked each plan compared to a No-Action plan. The ICFB believes this rating system is very confusing.

Chapter 12 Comments

It is foreseen under certain alternatives such as Alternative #7 that there will be an increase in population and housing. The ICFB is very concerned that the PEIR does not address where the water will come from to maintain the increase in population from alternatives like Alternative #7.

The greater majority of population found around the Salton Sea is in the unincorporated areas. The ICFB notes that the PEIR only addresses population and housing issues in incorporated areas and does not look at unincorporated areas. The ICFB is also concerned that the PEIR does not address fresh water needs for additional and on-going development in the unincorporated areas. On Page 12-1 of the PEIR it refers to Coachella Valley as being located in southeastern Riverside County. This is obviously an error. Blythe is located in southeastern Riverside County.

Chapter 13 Comments

On page 13-3 recreational areas are listed for Imperial County. Sunbeam Lake County Park has been omitted from this report. The ICFB feels it is important to note that private duck clubs in Imperial Valley number 10,040 acres as reported in the IID Monthly Crop Acreage Report dated January 11, 2007. Not only do these ponds provide private hunting they also provide a tremendous amount of food, water, and habitat for migrating waterfowl and shore birds during the fall and winter months.

The ICFB feels this large acreage could be leased from private owners and pressed into service as early start habitat. The infrastructure is already in place to provide year-round shallow water habitat from one inch deep to two feet deep. Table 13-1 reports an increase of 50,660 visitors at the Salton Sea State Recreational area between the 2003-2004 year and the 2004-2005 year. Since all sports fish had disappeared from the Salton Sea during this time the ICFB feels the increase reported may be in error.

Table 13-5, Item 5 states: "IID is required to mitigate the impacts to boat launching facilities, campgrounds, and trails that would become stranded as the Salton Sea water elevation recedes due to the IID Water Conservation and Transfer Project. The relocation may occur incrementally until the Salton Sea reaches its minimum and stable elevation which was projected to be -246 feet mean sea level (IID and Reclamation, 2002)"As it recedes, the IID is responsible to maintain boat launching facilities, trails & campsites mitigation."

The ICFB is opposed to anything that cost the farmers money. Since income from IID's delivery of water to farmers pays for IID projects the ICFB believes the farmers of Imperial Valley should not have to pay for these projects as a result of the farmers using water more efficiently which in turn would cause the Salton Sea to recede. In addition the water transfers will cause the Salton Sea to recede and therefore those responsible for the water transfer and those receiving the water in the transfer should pay for any mitigation for the loss of boat launching facilities, campgrounds, and trails. Sales to the farmers would cost the farmers money. In short, the ICFB questions why farmers should be responsible if they are conserving the water by being more efficient?

The ICFB believes that the only way optimized recreation can be achieved is through either Alternative #3 or #4.

Two members from the ICFB's executive board were appointed to the Salton Sea Authority's Outdoor Recreation Advisory Task Force which evaluated the recreational potential of a restored Salton Sea. These meetings were poorly attended and the ICFB believes less than 30 people from both ends of the Salton Sea took part in the final survey from which the information on pages 13-7 through 13-9 is derived. In addition the task force members were asked to

evaluate different types of recreation without knowing for which plan the activity would be used. The Salton Sea Authority conducted the survey and included information showing conceptual drawings for possible types of recreation for only Alternative #7. Because of that, coupled with the fact that a very small population was sampled, the ICFB feels the information in this whole section is flawed and should be deleted from the PEIR and a more accurate evaluation made of possible recreational opportunities.

Chapter 18 Comments

The overall impact is studied from an area encompassing the shoreline of the Salton Sea out to five miles. There is no mention of the view of the Salton Sea from Highway 86.

The PEIR does not address the impact on the bird watchers or others at the Sonny Bono facility or Red Hill ("Red Island").

The photograph in Figure 18-10 is described as "View to the north from the observation tower at Sonny Bono Salton Sea National Wildlife Refuge". This is incorrect. The Sonny Bono Salton Sea National Wildlife Refuge has two major areas for guests to visit. One is the headquarters of Sonny Bono Salton Sea National Wildlife Refuge located at the intersection of Sinclair and Gentry Road which has an observation tower. The other major location is 8.57 miles southwest in an area designated as Unit One of the Sonny Bono Salton Sea National Wildlife Refuge. It also has an observation tower. The photograph shown in Figure 18-10 was taken from the Unit one tower.

The ICFB believes the PEIR should address the visual impacts outside the studied areas. If they knock down a mountain to build dikes in the Salton Sea the view would be drastically changed and it is possible the quarry would disturb historical sites.

Chapter 19 Comments

On page 19-4 – Paragraph 4: There is an inaccuracy in this paragraph. Seeley receives its water from the West Side Main Canal, not the East Highline Canal.

Chapter 20 Comments

Page 5 fails to mention Calexico International Airport as one that provides passenger service and handles international flights.

On page 21 the ICFB notes that Alternative #4 has the least impacts on traffic while Alternative #8 requires the most trucks – 2,700 per day hauling rock and gravel.

Chapter 21 Comments

Page 21-5: The 2,000 acre solar farm near Calexico does not exist.

This concludes the Imperial County Farm Bureau's comments regarding the Draft Programmatic Environmental Impact Report for the Salton Sea. We appreciate your work in developing this document and the opportunity to respond to it as well. If you have any questions regarding this response, please feel free to contact our office at (760) 352-3831. Thank you in advance for your consideration of our comments.

Respectfully Submitted,



Vincent L. Brooke
President
Imperial County Farm Bureau