



Imperial County
Farm Bureau



March 9, 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
commentletters@waterboard.ca.gov

Subject: Comment Letter: Salton Sea

Dear Madam Chair and Members of the Board:

On behalf of Imperial County Farm Bureau (ICFB) I am writing to express our support for the Imperial Irrigation District's (IID) petition regarding restoration of the Salton Sea. This issue is a critical and urgent one of statewide importance, as the Board recognized in its Notice of Public Workshop. It is also a particularly significant issue for the residents, businesses, farmers, farmworkers and landowners of the Imperial Valley, which will bear the most direct impact to their land, businesses and livelihood as the result of a failure to restore the Salton Sea, which will then impact not only the local area, but also the State and the nation.

The agricultural industry in the Imperial Valley supplies more than 100 different crops from over 440,000 acres. The supply of winter vegetables, and early spring crops represents a large percentage of the U.S. total supply. A wide range of seed crops produced by Imperial Valley farmers supplies the U.S. and international needs. Forage crops, which are a significant part of the whole, also provide food for animals that produce milk and meat for human consumption.

ICFB is a general agricultural organization that represents approximately 660 members consisting of agricultural producers, landowners and farm service providers. We are actively discussing, developing and implementing policy relating to the Imperial Valley and the State of California. We are commenting because this topic is critical to our existence and the health of our area.

Farmers in the Imperial Valley are deeply concerned about the consequences of the State's failure to restore the Salton Sea. As demonstrated above, we are part of one of the most

productive agricultural regions in California and the entire nation, but our livelihood is in jeopardy if nothing is done to address the looming crisis at the Sea.

Even with the mitigation water mandated in the Quantification Settlement Agreement (QSA), the level of the Salton Sea has declined. The reasons for this decline we believe are as follows:

- Reduced flows from Mexico
- Improved efficiency of deliveries
- Improved efficiency by water users
- Partial lining of the All-American Canal
- Improved efficiencies from the use of the Brock Reservoir

It appears to us that to continue putting good water into the Salton Sea during a historic drought is not a wise use of our precious and limited agricultural water. The mitigation water as supplied is more than would have gone to the Sea without any fallowing. This is because of the above listed increased efficiencies. If the good water that is being put in the Salton Sea is to stop, you must either declare the Sea dead and / or the State must begin implementation of a restoration plan. If the State does not live up to its commitment there will be no QSA thus the "or" option does not exist.

Without restoration, declining water levels and increasing salinity at the Sea will have many serious consequences for farms and communities like ours. The declining water levels resulting from water transfers under the QSA will expose thousands of acres of lakebed to the air. Emissions from this exposed playa will significantly worsen our region's already-poor air quality, threatening agricultural productivity and causing many residents of the Imperial and Coachella valleys – including farmers and farmworkers – to suffer from heart disease, asthma, lung cancer, and other health problems. Emissions from the exposed playa will not only affect the health of the residents, but those emissions will also affect the health and vitality of the land and the crops needed to supply food to the State and the nation.

In addition, the economic impact of a dying Sea will affect the land within the Imperial Valley and will be a major burden on businesses, schools, public services, and the overall quality of life for residents in the Imperial and Coachella valleys. That is the harsh reality facing our region.

The QSA was supposed to prevent this from happening. As IID explained in its petition, it has long been recognized that water transfers out of the Imperial Valley would be a major threat to the Salton Sea. These concerns almost derailed the entire QSA, but the agreements were signed after the State promised to restore the Sea. This promise was a matter of basic fairness and the QSA would not have been signed without it. The water transfers benefit the entire State, so the Legislature agreed that the entire State would bear the cost of addressing the effects of the transfers on the Salton Sea. It is fundamentally wrong for the residents of the Imperial and Coachella valleys – areas that already suffer some of the State's highest unemployment rates – to be forced to bear the tangible and intangible consequences of California's effort.

The State's commitment to restore or mitigate the effect on the Salton Sea by the transfer of water contracted in the QSA has not been fulfilled. The plan originally developed by the State is too costly, and way too political in its design. Much cheaper but adequate designs exist. The supplemental funding mechanism of the Salton Sea geothermal development is a reasonable method of supplying resources for funding the restoration of the Salton Sea. It will reduce the burden upon the State and supply good jobs and economy to an under developed region of the State.

Now, more than a decade later since the signing of the QSA, almost no progress has been made on restoration. It is time for action. Several studies in recent years have confirmed that restoration is both feasible and necessary to protect farms, communities and wildlife around the Salton Sea. The Board should use its power to bring all necessary parties together to design, implement and fund a restoration plan that will create a smaller, sustainable Sea.

On behalf of Imperial County Farm Bureau and the farmers, farmworkers, landowners and farm service providers we represent, we call upon the Board to approve the IID's petition. The Board, the State, IID and all other interested parties should cooperate to ensure that the Sea is restored before it is too late. We ask the Board to convene a collaborative process among these parties that will identify a specific restoration plan that can be implemented and funded in time to avert the looming crisis threatening our region and the entire State.

Sincerely,

A handwritten signature in black ink, appearing to read 'Larry Cox', with a stylized flourish at the end.

Larry Cox
President
Imperial County Farm Bureau

Cc: Mr. Steve Benson, President, IID Board of Directors
Ms. Norma Sierra Galindo, Vice-President, IID Board of Directors
Mr. Matt Dessert, Director, IID Board of Directors, Division 1
Mr. Bruce Kuhn, Director, IID Board of Directors, Division 2
Mr. Jim Hanks, President, IID Board of Directors, Division 3
Mr. Kevin Kelley, General Manager, IID