Buena Vista Audubon Society
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December 11, 2006

[via email: SaltonSeaComments@water.ca.gov]

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

RE: Comments on Draft PEIR for Salton Sea

Dear Ms. Hoffman-Floerke:

I am writing of the 1,200 members of the Buena Vista Audubon Society to offer our comments on the Resources Agency's Draft Programmatic Environmental Impact Report for the Salton Sea Ecosystem Restoration Program (PEIR).

There is no question that the State of California must take action at the Salton Sea. The 'no action' scenarios described in the PEIR and in the Pacific Institute's *Hazard* (posted at http://www.pacinst.org/reports/saltonsea/index.htm) clearly demonstrate that the health of children and adults in the Imperial and Coachella valleys would be harmed by the hundreds of additional tons of dust that would blow, each year, off the land exposed by the shrinking Salton Sea. Imperial County – one of the poorest in the State – already claims the dubious distinction of having the highest childhood asthma hospitalization rate in California.

A smaller, saltier Sea would also be of little or no value to the fishermen who continue to fish at the Sea and consume their catch. A Sea with a saline content too high to support fish life will mean fewer fish to catch, as would a Sea beset with even more frequent fish kills. But fish kills will not only impact those people directly dependent on the subsistence which Salton Sea fish currently provide—they will also degrade the overall quality of life of people who must endure the putrid odor resulting from the kills. Clearly, we must act to protect the Salton Sea.

The question is how. Unfortunately, that question has not been fully answered by the PEIR. None of the alternatives presented in the PEIR satisfies the legal

requirements to maximize wildlife habitat, air and water quality protection in a reasonable timeframe.[1]

Most proposed alternatives suffer from massive construction and permitting requirements that would slow implementation, degrade air quality, and impose additional, unacceptable impacts over a wide area. In light of California's commitment to reduce its greenhouse gas emissions, it makes no sense to implement a project that requires massive amounts of energy to pump (and in some instances, treat) water, nor does it make sense to build massive dams or dikes that require thousands of truck trips each day, to move the tens of millions of cubic yards of rock needed for construction.

Fortunately, the PEIR contains the information and components necessary to piece together a successful plan from the proposed alternatives. Alternatives 1 and 2 provide important habitat to support many of the birds that currently use the Salton Sea. Alternative 4 offers a relatively low-cost, low-impact method to distribute water around much of the present shoreline and would provide additional habitat, shoreline protection and opportunities for recreation. The concentric lakes plan would provide direct air quality benefits, and would also offer a ready source of water for managing air quality problem areas that might arise in the future. And components of the larger north lake alternatives (Alternatives 5-7) provide recreation and economic development opportunities, enjoying the broad local support necessary for funding and implementation.

Therefore, we urge that DWR combine the following features from the proposed alternatives into a final, preferred alternative that would meet the legal requirements for restoration and provide opportunities for recreation and development in Imperial and Coachella Valleys:

- Between 25,000 – 50,000 acres of Shallow Saline Habitat Complex, as described in Alternatives 1 and 2, at the southern and northern ends of the Sea to provide habitat for shoreline species;
- Create concentric rings using geotubes or other dirt-filled barriers, as described in Alternative 4, to provide additional shallow habitat, deeper marine habitat, shoreline and view protection, air-quality protections, and recreation;
- Similar to the lakes found in Alternatives 5-7, provide a large (approximately 10,000 acre) North Lake, which would be the largest recreational lake in Southern California, fed by the Whitewater River to provide recreation and development opportunities without the costs and risks associated with a major mid-Sea barrier or the costs of pumping water from the southern end of the Sea;
- Provide at least one-half acre-foot of water per acre of exposed Seabed, as stipulated by the Salton Sea Advisory Committee, to prevent dust pollution caused by exposed playa, as described in Alternatives 1-3, 5-6 and 8;

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[1]. Pursuant to the Quantification Settlement Agreement ("QSA"), state and federal law require restoration of the Salton Sea because of its importance for fish and wildlife, air quality, recreation and local economic development. See California Fish and Game Code Sections 2930, et seq.

- Construct shallow saline habitat (known as "early start habitat") immediately to provide resources for birds during the long permitting and construction process, as described in all of the proposed alternatives; and
- Develop a plan that provides water for habitat and air quality mitigation first, in case of possible shortages or system malfunctions, as described in Alternatives 1-3.

A Final Preferred Alternative that contains all of these components, each of which is present and analyzed in one or more of the draft alternatives, would best meet the legal requirements to maximize habitat, air quality and water quality, while also providing substantial recreation and development opportunities. We urge, therefore, the State to select the Preferred Alternative with the components and features outlined above. Such an "Evolved Alternative" would best meet the needs of local communities, fish and wildlife, and the people of California.

Thank you for your consideration of these comments.

Sincerely,

Andrew Mauro, Conservation Chair
Buena Vista Audubon Society