



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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January 11, 2007

Secretary Mike Chrisman
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Dale Hoffman-Floerke
Chief, Colorado River and Salton Sea Office
California Department of Water Resources
1416 9th Street, Room 1148-6
Sacramento CA 95814

Re: Comments on Draft Programmatic Environmental Impact Report for Salton Sea Restoration

Dear Secretary Chrisman:

As your appointee to the Salton Sea Advisory Committee, representing the California Farm Bureau Federation (CFBF), I wish to submit these comments on behalf of CFBF.

Three of California's counties are the most directly involved in matters concerning the Salton Sea. Imperial County is most directly involved, as the principal tributaries, the New and Alamo River, contribute by far most of the water supply that maintains the water body. Riverside County contributes most of the balance, from the Whitewater River, and drains from Coachella Valley farmland. San Diego County has a distinct interest in the Salton Sea, inasmuch as the County Water Authority purchased a long-term interest in a present and future water supply, which traditionally had constituted a substantial part of the agricultural run off, which has, until now, maintained the Salton Sea.

All other counties within the service areas of members of the Metropolitan Water District of Southern California (MWD) have an interest in Salton Sea matters because: (1) they depend directly on part of the water supply from the Colorado River; (2) MWD has filed petitions with the State Water Resources Control Boards for water rights on the New and Alamo Rivers; (3) MWD has long-term contracts for water, for which MWD has paid Imperial Irrigation District (IID) to make available through conservation practices and facilities in IID's irrigated area.

Notice should be taken that the state legislature has a very direct interest in what happens to the Salton Sea, partly because it has enacted legislation which obligates the state to bear any cost (beyond a certain limited amount which will be charged against San Diego, Coachella and IID) required to maintain certain benefits to society, by accommodation of

fish and wildlife. Fish and wildlife has heretofore been somewhat ephemeral to the area, previously known as Lake Coahuilla, now known as Salton Sea.

In spite of the financial protection to the local entities in Southern California, it is the conviction of CFBF that the State of California is not in a financial position to make it a prudent obligation on the state to enter into any but the most frugal plan to return the Salton Sea to a wildlife productive condition.

Therefore, on behalf of CFBF, it is recommended that the state pursue a plan quite similar to Alternative Four, other wise known as Concentric Lakes, depicted in the Draft Programmatic Environmental impact Report Executive Summary of October 2006.

CFBF's support of this choice among the eight plans and the two "no action" alternatives offered in the DPEIR, is based upon the following rationale.

#1. This is a plan presented to solve a problem for a period up to 75 years. Although no one actually believes any plan adopted up to now could go unmodified for very long, Alternative Four appears to be a plan which would offer fish and wildlife benefits earlier (during the construction phase) than any of the others. It does not depend on completion of an expensive fifteen-mile-long rock filled barrier across the sea to become operable. Even if some of the concentric lakes were not completed, the isolation of the highest quality water for the part of the time could begin to produce benefits and continue to do so until construction resumed. Partial construction will allow and promote partial benefits.

#2. From a cost standpoint alone, Alternative Four stands out beyond all others with its prediction that it could operate on a long-term basis with only 25 employees. The other plans require from 4 to 14 times as many employees.

#3. This plan, with its principal earth moving operation constructed primarily by floating dredges with native material reduces to a minimum dependence on highway movement of imported materials.

#4. It appears that the local people whose resources are most involved in and by the project support Alternative Four.

About thirty years ago, CFBF developed its first statewide policy on Salton Sea, which has periodically been updated. Attached is our present statewide policy, which has been reconsidered each year by our House of Delegates.

Competition for water has not reached its apogee at this time. As the competition becomes more crucial, Salton Sea inflows are likely to be reduced to a minimum of essential tile water soil drainage flows. It is essential not to construct an expensive system that is dependent on minimum flow to the sea that exceed 400,000 acre-feet

JAN 16 2007

Secretary Mike Chrisman
January 11, 2007
Page 3 of 3

annually, as this is approximately the maximum tile drainage water which the long-term future could rely upon at this time.

The San Diego County Farm Bureau and the Imperial County Farm Bureau are in support of this California Farm Bureau Federation Position. The Riverside County Farm Bureau has advised us that it will submit its own position later, as it has not arrived at a conclusion at this time.

Sincerely,

Al Francisco for Bill DuBois
William I. DuBois

CALIFORNIA FARM BUREAU FEDERATION
2007 Official Policies

TITLE: SALTON SEA
(CFBF 88)

1 The Salton Sea, an economic and environmental 48
2 resource of national importance, is critical as a reservoir
3 for drainage of irrigation, municipal and storm water as
4 declared in 1924 by the Department of Interior.

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6 Any project undertaken to reclaim the Salton Sea must:

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8 1. Not increase demand on the available water supply,
9 such as diverting usable water directly into the Sea;

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11 2. Ensure the continued use of the Salton Sea as a
12 reservoir for irrigation, municipal, and stormwater
13 drainage;

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15 3. Reduce or stabilize the overall salinity of the Salton
16 Sea;

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18 4. Stabilize the surface elevation of the Salton Sea;

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20 5. Enhance the potential for recreational uses and
21 economic development of the Salton Sea;

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23 6. Include full protection of neighboring areas and
24 residents from damages resulting from the project;

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26 7. Employ the most cost-effective measures available;

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28 8. Tie any cleanup of the New and Alamo Rivers,
29 including sewage from international sources, to long-
30 term reclamation of the Sea; and,

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32 9. Provide full compensation or provide for agriculture
33 to recover its expense under any plan which restricts,
34 regulates or otherwise alters agricultural inflows to the
35 Sea for any and all costs or impacts, including but not
36 limited to the cost of facilities to alter Sea inflows, lost
37 property values, and loss of crop production.

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39 Any reclamation of the Sea is a benefit to society as a
40 whole, and society should bear the cost of any
41 reclamation project or any liability arising from
42 reclamation. (1999)

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