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Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
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Sacramento, CA 95814
commentletters@waterboards.ca.gov

Subject: Comment Letter: Salton Sea

Dear Madam Chair and Members of the Board:

I am writing to express support for the Imperial Irrigation District's 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, growers, farmworkers, and agricultural support industries of the Imperial Valley who will bear the most direct impacts to their land, businesses, and livelihood as the result of a failure to restore the Salton Sea. These impacts, however, will also be felt beyond this region, by residents throughout the state and the rest of the nation.

The Imperial Valley agricultural region of Imperial County lies to the east and south of the Salton Sea and consists of over 473,000 acres of farmland; this is over 94% of the farmland in the County. The gross production value of agricultural commodities in Imperial County in 2013 was over \$2.16 billion. Agriculture provides a large percentage of the economic value, direct farming jobs, and indirect support jobs in Imperial County.

Up to two thirds of the fresh vegetables consumed in the United States in the winter (broccoli, cauliflower, lettuce, romaine, leafy greens, spinach, cabbage, etc) are grown in Imperial County. According to USDA's 2012 Census of Agriculture, Imperial County is ranked #8 out of 3,079 U.S. counties in total annual agricultural production of all commodities.

The prevailing winds in the Imperial Valley are generally from the west, but are also variable and blow from other directions. Farmland within a few miles of the Salton Sea will be most affected by any windblown dust from the drying playa due to their close proximity to the sea, but days of high winds that carry large amounts of dust in the air will strongly affect downwind fields for a much greater distance. All of the farmland in the Imperial Valley is downwind at some point and can be negatively affected by exposure of the Salton Sea playa. Commodities grown in this area include fish; livestock such as beef, dairy, and sheep; alfalfa, bermudagrass, and other hay and pasture crops; wheat; sugar beets; melons; vegetables such as lettuce, leafy greens, broccoli, cauliflower, sweet corn, and tomatoes; tree crops such as citrus, olives, mangoes, dates, and figs; basil; honey and wax; and many different seed crops.

As the Salton Sea recedes and more playa is exposed, assuming that the windblown dust will contain nothing more than salt and dirt, the following significant impacts to agriculture are expected:

1. An increase in salinity as new windblown salt is deposited in irrigation canals, on plants, and onto the soil. Imperial County growers already struggle to keep salt levels down to protect the productivity of the soil. When salt levels in a field get too high, the "fix" is to irrigate with a high enough volume of water to drive the salt below the root zone. If unable to do that due to the current drive to conserve water, the fields will become saltier and lose productivity, eventually being unable to support growth of most crops.
2. Under Imperial County conditions, where the average rainfall is only 3" per year, increased amounts of blowing dust could become a serious problem in some fields, with the possible exception of some sprinkler-irrigated crops. Various studies on the effects of accumulating dust on plants have found reduced growth, reduced photosynthesis, increased leaf temperature, and decreased water use efficiency, all of which would negatively impact plant productivity. This effect would likely also impact the native desert plants to the east of the Imperial Valley.
3. Fresh vegetables such as broccoli, cauliflower, and leafy greens are packed in the field, cooled, and delivered quickly to market. Accumulating dust during windy periods could make these crops unmarketable due to the dirt on the produce, and consumer expectations that the vegetables they buy should look clean. If washing these vegetables prior to delivery to market becomes necessary, bulk produce would have to be shipped out of the county which would increase the cost to the producer (and therefore to the consumer), reduce the quality of the produce (due to increased handling and increased time to get it to market), and reduce local jobs due to shift of the packing jobs to the processing county.
4. According to the Pacific Institute report "Hazard's Toll; The Costs of Inaction at the Salton Sea", salt-laden dust has also been reported to damage sweet corn leaves, and could also damage leaves of other crops such as lettuce and spinach, making them unmarketable. Also, some commodities such as carrots and onions are very sensitive to salt which causes reductions in germination, growth, and yield.
5. Days of high wind when large amounts of windblown dust from the Salton Sea playa occur would interfere with various activities necessary for crop production such as irrigation, plant thinning, harvest, and tractor work through both reduced visibility and the health effects of breathing the dust. Having to delay any of these activities for a more favorable, calm day can affect crop production when timing is critical.
6. Some commodities might not be economical or possible to grow due to the above impacts. Loss of some commodities would also result in loss of support industries, such as packers, coolers, seed companies, etc, depending on the commodity lost. This creates an even greater local economic and job loss impact.
7. Other possible impacts might include changes in the microclimate of the area, effects on honey bees exposed to the dust when foraging for pollen and nectar, and loss of export markets due to the above impacts on commodities.

Another factor to be concerned about is that the dust blowing off of the Salton Sea playa may contain more than just dirt and salt; it may contain whatever else is present now in the water and the sediment of the sea.

According to studies cited in the Air Quality and Public Health Impacts section of Pacific Institute's report "Hazard's Toll; the Costs of Inaction at the Salton Sea", samples of the sediment of the Salton Sea showed the presence of PCB and DDE, and the naturally-occurring elements antimony, arsenic, cadmium, chromium, lead, and selenium. PCBs are toxic synthetic chemicals that were once used in electrical equipment; they were banned in the United States in 1979 but persist in the environment. DDE is a breakdown product of DDT, a pesticide banned in the United States in 1972, but whose breakdown products also persist in the environment. Some of the naturally-occurring elements can be toxic if overexposure occurs.

In addition, whatever compounds, elements, or contaminants are in the water of the Salton Sea will probably concentrate in the receding water of the Sea, and may also be present in the drying playa.

These materials, if wind-blown along with the salt and dirt of the playa, will also be deposited on our crops and farmland soils. Whether or not this will be significant enough to cause additional problems with crop production or with human health is unknown at this time.

It is critical that the crops in this region are protected from any possible negative impacts or contamination caused by the wind-blown playa of the receding Salton Sea in order to prevent local economic and job losses. However, the above impacts to Imperial County agriculture are not just of local or regional concern.

Since our growers provide much of the fresh vegetables consumed throughout the United States during the winter months, it's important to protect this important food resource for the benefit of the entire country. In 2013, Imperial County produced more than 1.6 million tons of winter vegetables which were shipped all over the United States and the world.

In addition, our growers supply a large quantity of livestock feed in the form of hay and grains. In 2013, Imperial County produced 1.7 million tons of hay crops. About 30% of our hay is exported to other countries, and the rest remains in the United States to feed livestock, another critical part of our food supply.

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. The QSA was supposed to prevent these negative impacts. As the 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 and businesses of the Imperial Valley — an area that already suffers some of the State's highest unemployment rates — to be forced to bear the consequences of California's effort to reduce its usage of Colorado River water.

Now, more than a decade later, 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 and communities 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.

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,



Connie Valenzuela
Imperial County Agricultural Commissioner

cc: Stephen W. Benson, Board President, Imperial Irrigation District
Ryan E. Kelley, Chairman of the Board, County of Imperial