



## COUNTY OF IMPERIAL

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# PUBLIC HEALTH DEPARTMENT

ROBIN HODGKIN, M.P.A.  
*Director*

STEPHEN W. MUNDAY, M.D., M.P.H., M.S.  
*Health Officer*



March 10, 2015

Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: Comment Letter: Salton Sea**

Dear Madam Chair and Members of the Board:

As the Health Officer for the County of Imperial, I want to thank you for recognizing that the impact of the transfer of water from the Imperial Valley is an issue of statewide importance and for the opportunity to provide input regarding the need for the California State Water Quality Control Board to take further action to address the Salton Sea's future.

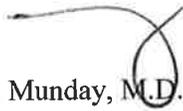
My role as Health Officer, is to protect and promote the health of Imperial County's population—this community, as a whole, is my patient. The link between elevated levels of particulate matter and adverse health impacts is extensively documented and incontrovertible. Therefore, it is my medical opinion that the detrimental effects of the accelerated and exacerbated damage to our environment from highly emissive sediment exposure created by the transfer of water will worsen the health of our community which is already struggling to address disproportionate rates of respiratory illness, particularly asthma.

Air quality in the Salton Sea air basin, which includes all of Imperial County, does not currently meet state or federal standards for PM<sub>10</sub>. Elevated PM<sub>10</sub> levels are associated with asthma exacerbations and a decrease in the growth and development of lung function in school-aged children, and are associated with an increase in the risk of cardiac disease, lung cancer, and death in adults. Currently, Imperial County has one of the highest rates of emergency department visits and hospital admissions due to asthma in California. Children under 5 years of age are most severely affected. Over the past decade, this community has come together to reduce the burden of asthma. These efforts have made an incremental difference by reducing asthma hospitalization rates from 19 to less than 17 per 10,000 population. Despite this small improvement, the asthma hospitalization rate in Imperial County still greatly exceeds the rate in California, as a whole, of 11 per 10,000 population.

In addition to an increase in PM<sub>10</sub> dust emissions that will rise as a result of emissive sediment, there are other risks associated with sediments that would be exposed as the Salton Sea recedes. These include unhealthy concentrations of PCBs (polychlorinated biphenyls) and other elements such as cadmium, chromium, lead, and selenium.

Your Board has documented that the water transfer has the potential to exacerbate air and water quality problems in the Salton Sea and that those problems would exist in the absence of the water transfer. It is not my intention to enter into a debate about the historic health of the Salton Sea. My concern for the community is the fact that without timely intervention, the accelerated and exacerbated exposure of the shoreline caused by the water transfer will worsen the health of a population that is already struggling with high particulate matter and its negative health effects. On the other hand, implementation of a sustainable plan for the Salton Sea, will improve the health of our community.

Sincerely,



Stephen W. Munday, M.D., M.P.H., M.S.  
Health Officer

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