



March 6, 2015

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

Subject: Comment Letter: Salton Sea

Dear Madam Chair and Members of the Board:

On behalf of Imperial Valley Vegetable Growers Association, we are writing to express our support for restoration of the Salton Sea. This issue is a critical and urgent one of statewide importance, as the State Water Resource Control Board recognized in its Notice of Public Workshop. It is also a particularly significant issue for the residents, businesses, farmers, and farmworkers of the Imperial and Coachella valleys, 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 and Yuma supplies 94.7% of the lettuce product in the winter months. In Imperial Valley the vegetable and melon crops in 2013 were valued at \$845,401,000 and Imperial County was one of the ten top producers of agriculture in the State of California. We expect that number and level to be increased for 2014.

Imperial Valley Vegetable Grower Association represents the vast majority of farmers and shippers within Imperial Valley that are involved in this important food industry. Founded in 1968, during the strife between labor and farmers, we now are focused on food safety and water issues.

Farmers and shippers in the Imperial Valley are deeply concerned about the consequences of the State's inaction 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 and those of our employees, and those residents who provide services to farmers, their families, and employees are in jeopardy unless action is taken and taken soon.

Without a viable Salton Sea restoration plan that addresses the declining water levels, the increasing salinity and funding, the resulting impact at the Sea and the adjacent areas will have many serious consequences for farms and communities like ours. The declining water levels resulting from water transfers under the Quantification Settlement Agreement (QSA) will expose thousands of acres of lakebed to the air. Current farm land five miles beyond the existing shoreline encompasses at least 50,000 acres and that is just for Imperial Valley. 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 Valley. That is the harsh reality facing our region.

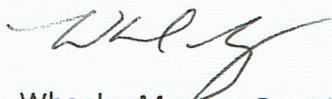
Our farmers and shippers have invested time and money to develop food safety standards and our proud of those which represent some of the highest standards in the nation. Many of those standards have been established on a voluntary basis. The impact from the increasing exposed playa will certainly create dust particles that threaten those standards. The impact will be first for those 50,000 acres nearest the Sea, but will grow as the Sea recedes and the wind carries the particles to entire Imperial Valley and into Arizona.

The QSA, as we understood it, 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 Valley and adjacent 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 to reduce its usage of Colorado River water.

Now, more than a decade later, little 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. This 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 Valley Vegetable Growers Association, as well as our farmers, farmworkers, and community, we call upon this Board to approve IID's petition. This 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 this 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,



Wheeler Morgan, President

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