

CRWQCB-CRBR Exhibit No. 1: Written Testimony by Phil Gruenberg, Executive Officer, California Regional Water Quality Control Board, CRBR

Although I am not opposed to the transfer of water from Imperial Irrigation District, and recognize the need for the transfer to accommodate California's obligation to not exceed usage of Colorado River water in excess of 4.4 m af/y, I want to present some concerns relevant to the transfer.

The primary concern regards the Salton Sea. The Salton Sea is California's largest inland body of water and supports many beneficial uses including water contact and non-contact recreation, warm freshwater habitat, wildlife habitat, and threatened/endangered species. The Sea has become a critical component of the Pacific Flyway as historic wetlands have diminished. Over 400 species of birds are known to visit or reside at the Salton Sea National Wildlife Refuge. Additionally the Sea is considered California's most prolific fishery. The fishery supports multitudes of fish-eating birds plus a sportfishery. Future protection of these beneficial uses is dependent upon the Sea receiving adequate replenishment of freshwater and upon implementation of a project to stabilize the Sea's increasing salinity.

The Salton Sea is located in a closed basin, so due to evaporation, salts are concentrated. Since the 60's the salt buildup has been recognized and several studies have identified projects which if implemented could stabilize salinity. Due to the priority and cost (all viable projects are estimated at over \$100 M, and many much more) there has been no action to address Salton Sea restoration until fairly recently.

On November 12, 1998, HR 3267, The Sonny Bono Memorial Salton Sea Reclamation Act became law. The law directs the Secretary of the Interior to undertake a project to reclaim the Salton Sea that shall 1) reduce and stabilize the overall salinity of the Salton Sea; 2) stabilize the surface

elevation of the Salton Sea; 3) reclaim, in the long term, healthy fish and wildlife resources and their habitats; 4) enhance the potential for recreational uses and economic development of the Salton Sea; 5) ensure the continued use of the Salton Sea as a reservoir for irrigation drainage. Thus the passage of this Act breathed new life into the likelihood of a Salton Sea restoration, and must be taken into account during any decision making process pertinent to the Sea.

A secondary concern regards potential degradation to the water quality of the drainageways within the Imperial Irrigation District that empty into the Salton Sea. These drainageways are almost 1500 miles of channels designated as supporting the following beneficial uses in the Regional Board's Water Quality Control Plan: freshwater replenishment; limited recreational use; warm water habitat; wildlife habitat; and threatened/endangered species habitat in some instances. These waterways and beneficial uses are primarily sustained by drainage from irrigated cropland in Imperial Valley. This Regional Board has long recognized this drainage flow as serving an important beneficial use as freshwater replenishment for natural or artificial maintenance of surface water quantity or quality. Attached for the record are staff memoranda (CRWQCB-CRBR Exhibit Nos. 2 to 4) for details on some water quality and other regulatory impacts.

Transfer of water out of Imperial Irrigation District can have a wide array of negative water quality impacts depending on how the transfer of water is accomplished. Most significantly, if it is implemented by reducing or eliminating surface runoff or tailwater off the cropland, selenium concentrations in the drains will rise. Selenium concentrations up to 300 ug/l have been detected in subsurface tile drainage feeding these drains. The selenium largely originates from drainage in Colorado, and magnifies in tile lines due to evaporation during cropland irrigation. Tailwater is thus presently diluting the selenium to more acceptable levels. However wildlife biologists have projected that increases in present selenium concentrations could have disastrous consequences in the drains and Salton Sea. CRWQCB-CRBR Exhibit No. 3 details some potential impacts.

Thus in summary, if water conservation in Imperial Valley is pursued through a combination of either tailwater return systems, canal lining in Imperial Valley, or operational spill reduction the most significant impacts would be twofold:

- A reduction in freshwater replenishment to the Salton Sea making a restoration project more costly, and at some point unreasonable.
- An increase in selenium concentrations in Imperial Valley drainageways.

As an alternative, if the water transfer was accomplished by marginal cropland retirement, the above two impacts would be eliminated or at least reduced, with the following results:

- Selenium discharge off non-irrigated cropland would cease.
- The Sea would lose only 1/3 as much freshwater since the 2/3 used consumptively by the irrigated cropland would be transferred instead of applied to the marginal ground that is retired.

In conclusion, my point is not that a transfer should not proceed, but that the means of freeing up the water for transfer will have a tremendous bearing on the fate of the Salton Sea and its tributaries. These results need to be fully recognized and considered carefully before selecting a course of action. The fate of the Salton Sea is at a crossroads, and a decision is needed soon to provide appropriate direction on a wide array of interconnected water issues. Leadership is desperately needed to untangle the present complicated situation. Unfortunately it is unlikely that the final results are going to provide a win win outcome.