



LATE COMMENT

Hintz & Balvin Communications



To: Felicia Marcus, Chair of the State Water Resources Control Board

From: Christle Balvin, Hintz & Balvin Communications *Christle Balvin* March 10, 2015

I am commenting on the petition filed by Munger, Tolles and Olson for the Imperial Irrigation District and related to the Salton Sea and water conservation efforts in the Imperial Valley.

Problem:

The State of California agreed, under the Quantitative Settlement Agreement, to contribute to the mitigation of the environmental damage done to the Salton Sea. The problem has become more acute with the passage of time because:

- the lack of water to put into the Salton Sea due to the heavy demand from MWD, San Diego and Coachella;
- the accumulation of toxins draining into the Sea and coming from the increasing reliance of farmers upon agricultural pesticides;
- the disbursement of these toxins, when airborne, throughout neighboring counties as they dry up and accumulate on the playa of the ever diminishing Sea;
- the high cost of mitigation due to years of neglect by all involved parties;
- the growing demand of urban California for new water, the sole source of which in Southern California may be the Imperial Irrigation District with its senior priority water rights..

Moral dilemma:

In addition to the economic and health related reasons for mitigating the deteriorating condition of the Salton Sea, there is a moral issue related to its maintenance and sustainability. Simply put, **does the need for water by rapidly developing urban areas (such as San Diego) deserve preferential treatment over largely poor agricultural areas with largely Latino populations?**

- First and foremost is the fact that Imperial County has one of the **highest rates of childhood asthma in the State**, probably caused by windblown toxins from the beaches surrounding the Sea. It also has outmoded medical facilities with limited treatment options. Most seriously ill residents are forced to travel the 150 miles to San Diego for treatment.
- Next, Imperial is one of the **poorest counties in the State** and water conservation efforts obtained through fallowing will result in the elimination of farm labor jobs and the depletion of farm industries in the County.

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This poses the serious question (and moral dilemma) of whether an area of roughly 170,000 people which is probably 90% Latino should be required to conserve water and therefore sacrifice its economic base to fulfill the needs of larger population centers with questionable records of water conservation themselves? .

Potential Solutions:

There is some confusion among growers in the Imperial Valley as to whether or not the QSA requires fallowing as the sole and preferred method of water conservation. One of the former attorney's for the IID is now saying that fallowing was not required but was selected as the best means of conservation. Currently, it is estimated that the IID is fallowing approximately 50,000 acres of good arable land in order to send water to San Diego, the Metropolitan Water District (MWD) and Coachella. It is questionable that any of these water beneficiaries have, under the terms of the QSA, been required to help mitigate the Salton Sea, a situation ^{and} demand from these beneficiaries has helped to create. My recommendations:

- Those who receive IID water, either at cost or a very low fee per acre foot, should initiate strict water conservation measures of their own. Rancho Santa Fe in San Diego County has been sited as having the highest per capita water use in the State. So let's not just put conservation requirements on Imperial. Let its water beneficiaries do their share.
- Where San Francisco is paying between \$2,000 and \$3,000 per acre foot for water from the State Water Project, Imperial's water beneficiaries are getting it at cost (MWD) or at a fraction of its current value. Coachella pays roughly \$250 per acre foot while San Diego gets theirs for \$650. Let's return some of the value of Imperial's water, obtained under senior priority rights, to benefit the Imperial Valley. The economy and people of the area need it and should receive it.
- Put a water restriction on all water intensive crops such as Sudan Grass and almonds for the duration of the drought, which may be permanent.

So I am writing to ask that another means of water conservation, other than fallowing, be implemented as a part of the water sharing arrangements now being considered to save the Salton Sea. The new water conservation and mitigation measures should be paid for by the State with the other water beneficiaries sharing in the cost. The introduction and implementation of a state-of-the-art water system to conserve and transmit water in the Imperial Valley so it can conserve and better share this vital resource is needed and needed now. This will result in the conservation of enormous amounts of water, better protection of residents from the dust created by fallowed and the protection of jobs and the economy of the Imperial Valley. The Imperial Valley now supplies an estimated 50% of our nation's winter table vegetables. Water used to produce vegetables is well used. Given that the National Intelligence Report specifies food shortages as a major threat to our future security, places like Imperial with water, good arable soil, constant sunshine and a strong labor pool must be protected even as we face the unexpected water crisis that is with us now and may continue well into the future.

Thanks you for considering my views.