



January 10, 2019

Phil Rosentrater
Executive Director
Salton Sea Authority
82995 Hwy 111, Suite 200
Indio, CA 92201

RE: Proposed North Lake Project

Dear Mr. Rosentrater:

On behalf of Alianza Coachella Valley, Audubon California, Defenders of Wildlife, Environmental Defense Fund, Koukuey Design Initiative, Pacific Institute, and Sierra Club California, we encourage the Salton Sea Authority (Authority) to expedite the implementation of a North Lake plan for the Salton Sea. We also offer comments and suggestions on the proposed North Lake concept that was briefly summarized at the [June 12th](#) and [November 13th](#) meetings of California's Salton Sea Management Program (SSMP) 10-Year Plan Committee. As we have noted previously, a North Lake could offer a host of habitat, recreational, and economic development opportunities and should be pursued. A North Lake project also offers the Authority the opportunity to lead on a local project.

As you know, time is of the essence. More than three years have passed since Governor Brown established acreage milestones with his Salton Sea Task Force Agency Actions, yet the state still has yet to construct a single acre of habitat at the Salton Sea. The SSMP has also failed to achieve the

acreage milestone established by the State Water Resources Control Board's [Order WR 2017-0134](#). This inaction does not occur in a vacuum. Since the signing of the Quantification Settlement Agreement in 2003, the salinity of the Salton Sea has increased by more than a third while its surface has dropped by more than eight and a half feet, exposing more than 20,000 acres of lakebed. Populations of fish-eating birds such as pelicans and cormorants have plummeted, while dust emissions have increased, harming the people that live downwind from the Sea.

Fortunately, last June, California voters approved \$20 million for the Authority to construct Salton Sea projects, affording a real opportunity for the Authority to demonstrate leadership and competence and build functional projects at the Salton Sea.

We encourage you to act quickly on this opportunity. Please include a report at the January 24 Authority Board Meeting describing a general planning and construction schedule for a North Lake and a conceptual budget for expending the \$20 million authorized by Proposition 68, as well as other funds currently available to the Authority. We also encourage you to include a report on the status of the North Lake Plan at the January 24 Board Meeting, toward an action item at the February 21 Board Meeting on a preferred alternative and a schedule for project design and implementation. This is an excellent time to demonstrate that the Authority can act decisively on behalf of the Salton Sea, expediting consideration and implementation of the North Lake vision championed by Supervisor Perez a year ago and reviewed by Riverside County in the summer of 2017.

We encourage you to incorporate the following recommendations into the formation of the North Lake Plan:

- **Lake elevation** – The North Lake plan should maximize lake elevation, to increase surface area and depth and to better provide a water supply for other projects. Presumably, the design elevation could be -226.0' (NAVD 1988), roughly the Salton Sea's elevation in 2003. A North Lake should include deep (~10') water habitat for primarily fish-eating birds, such as pelicans and cormorants. A target elevation of -226.0' would rewet exposed playa, help capture drain flows that might otherwise be lost to evaporation and vegetation, and minimize the need to extend existing roads to access the North Lake. Additionally, a higher elevation North Lake could more readily supply water to refill the marinas of shoreline communities to the south.
- **Inflow sources & quantities** – The North Lake should be sized to optimize the capture of Whitewater River baseflows, and as much flood flow from the river as can be captured at reasonable cost. The SSA should task its consultant with determining average annual Whitewater River baseflows and estimating what additional construction costs would be required to capture flood flows. The consultant should also describe the tradeoffs between routing flood flows through the North Lake versus diverting baseflows plus some portion of flood flows into the lake. Any North Lake plan should include the projected water demand for the lake, and an annotated list of sources to meet this demand.

- **Capture and Recharge** – The Authority should work closely with the Coachella Valley Water District (CVWD) to expand CVWD’s floodwater recharge program, benefitting the region’s aquifer and increasing reliable baseflows to the North Lake. Such an approach might be able to leverage additional federal infrastructure funding and expertise. Close coordination with CVWD will also avoid potential conflicts with CVWD’s updated Stormwater master plan or construction of new wastewater recycling facilities.
- **Salinity** – We do not believe the North Lake plan should set specific salinity objectives or targets. Since the state’s preference for higher-salinity water is mainly intended to avoid selenium biomagnification and since selenium should be less of a concern given low-selenium Whitewater River flows, the North Lake should avoid the significant capital and operations costs of pumping remnant Salton Sea water to manage salinity. Instead, the North Lake plan should simply use raw river water to sustain the North Lake. Discharge from the Lake could then be used downgradient to support additional habitat and dust control ponds.
- **Selenium** – The use of lower-selenium Whitewater River flows should be prioritized. Use of drain water with selenium concentrations greater than the 3.1 ppb (identified in the draft EPA criteria) should be avoided. Additionally, please refer to Agrarian’s sediment map (attached), to avoid siting the North Lake atop high-selenium sediments.
- **Torres-Martinez Desert Cahuilla Indians** – The Tribe must be an integral part of the planning process, given their extensive property in the project area. The Tribe might also be able to supply rock for the North Lake impoundment structure.
- **Community Amenities** – The Authority should include community amenities as part of the concept and design of the North Lake to maximize the opportunity for public access and stewardship. These amenities should be developed in conjunction with residents of the Eastern Coachella Valley, and should be included as part of the first phase of the project build-out.
- **Resident Engagement** – The Authority should work with closely with local community groups and residents throughout the design, planning, and construction process. A dedicated engagement budget and strategy that is developed upfront is necessary to serve as a roadmap for outreach and engagement decisions, and opportunities for participatory budgeting should be included within the engagement process.
- **Public Access** – The North Lake plan should designate public access along much of the shoreline and in a portion of the deeper-water lake, but restrict public access near the delta and in a portion of the lake (perhaps 50% of areas deeper than three feet) to offer a refuge for fish and birds.
- **Costs** – The North Lake plan should clearly describe the estimated capital and annual costs associated with different Lake configurations.

Thank you for your consideration of these recommendations and suggestions. We strongly support a viable North Lake project and stand ready to work with you to expedite its funding and implementation.

Sincerely,



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California Program Director
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