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Research for People and the Planet

October 26, 2005

Ronald J. Enzweiler
Executive Director
Salton Sea Authority
78-401 Highway 111, Suite T
La Quinta, CA 92253-2066

Dear Mr. Enzweiler,

Thank you for your letter of September 21, and for your interest in developing creative solutions to the problems plaguing the Salton Sea.

I offer the following initial thoughts in response to your request for my comments on the proposed 'Design Changes to the Salton Sea Authority's Preferred Alternative Plan for Salton Sea Restoration.'

1. I am troubled by the Plan's emphasis on economic development and recreational opportunity, which seems to come at the expense of wildlife habitat. Notably, the Plan sets aside approximately 12 miles of low-slope shoreline within a dedicated habit zone in the south end of the Salton Sea. This is a small percentage of the shoreline dedicated to recreational uses. The last bullet of your letter (p. 14) suggests that more than half of the Sea's shoreline will be dedicated for wildlife, though this appears to be inconsistent with the use designations described in the rest of the letter and in 'Dwg. A.' Designated boat channels and other dedicated recreational areas will make for poor habitat. Additionally, although birds use the delta areas extensively, I have some questions about the potential adverse impacts of expanding the geothermal facilities adjacent to this limited habitat zone.
2. I am also troubled by a recent *Imperial Valley Press* article stating that the Plan would create complementary habitat enhancement projects over 10-20 years. Deferring the creation of such projects reinforces the perception that the Authority prioritizes economic redevelopment over the revitalization of the Sea's threatened ecosystems.
3. I am skeptical of the Authority's ability to commence construction of its revised plan as a locally managed and financed project within three years. Specifically, the projection on 'Dwg. D' that the Master EIR can be completed and permits on local actions can be obtained, all within one year, strikes me as unrealistic. Given the large number of local, state, and federal property-owners in the project site, I suspect that just obtaining the necessary local, state, and federal permits will require two to three years, after the master EIR has been certified. Additionally, I suspect that any credible contractor will need to perform extensive site feasibility assessments, given the nature of the Sea's unconsolidated sediments and the extent of construction envisioned by this revised Plan, assessments that could easily require another two or more years of intensive work. I am concerned that statements to the effect that construction could commence within three years will raise unrealistic expectations, which in turn will lead to further

disappointment among the very local stakeholders whose support will be vital for the success of any restoration plan at the Sea.

4. I commend the Authority's interest in financing the revised Plan with local sources. However, given the Authority's expectation that the State of California would contribute \$275 million to the Plan, and that the federal government would both donate some 10,000 acres of BLM lands to the Authority and guarantee up to \$600 million in local tax increment bonds, this would not be solely a local project. These state and federal contributions carry with them a responsibility to meet the objectives laid out in state and federal legislation. From my perspective, the most important of these objectives is to restore the Salton Sea ecosystem and permanently protect the wildlife dependent on that ecosystem.
5. I am encouraged that the Authority's Board of Directors has not explicitly approved this specific design, since this provides room for discussion and further revision. Although this flexibility makes it difficult to commit to endorsing a plan-in-progress as the 'preferred alternative,' it does provide the opportunity for meaningful comment and revision.
6. I appreciate your recognition of the potential threat posed by the Sea's production of hydrogen sulfide and your interest in addressing this threat. Recent email exchanges suggest that the ability of Solar Bees to effectively out-gas sufficient volumes of hydrogen sulfide has not been demonstrated to the satisfaction of members of the scientific community.
7. My understanding is the Sea's barnacle populations have crashed, which may explain the lack of barnacle fouling on the Solar Bees. I would expect that, if the revised Plan does reduce and stabilize salinity at the Sea, and if the Solar Bees effectively reduce H₂S concentrations, that barnacle populations will rebound, potentially reducing the effectiveness of the Solar Bees.
8. My understanding is that the Authority's jurisdiction extends outward from the Sea to Highway 86 on the west, and to Highway 111 on the east. However, the boundaries of the 'Salton Sea Tax Finance District Boundary' extend well beyond these highways. At your convenience, please identify the legal authority that grants the Salton Sea Authority the ability to extend the tax boundary beyond the Authority's own jurisdictional boundaries.

Thank you again for your interest in developing creative solutions to the problems plaguing the Salton Sea, and for your willingness to improve and revise the Authority's Plan. I am hopeful that the Plan can be revised to afford greater protection to fish and wildlife and the habitats they require. I look forward to continuing to work with you to develop the best feasible plan for the Salton Sea.

Sincerely,



Michael Cohen
Senior Associate

cc: SSA Board of Directors
Dale Hoffman-Floerke, DWR
Mike Walker, Reclamation
Doug Barnum, Salton Sea Science Office
Kim Delfino, Defenders of Wildlife
Julia Levin, Audubon California