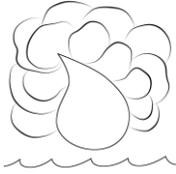


March 10, 2015



Sephton Water Technology

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

Subject: Comment Letter: IID Petition on Salton Sea

Dear Ms. Townsend,

My company, Sephton Water Technology, is collaborating with the Imperial Irrigation District (IID) to execute one of the three projects partially funded under the Salton Sea Financial Assistance Program. More significantly, I've been working at the Salton Sea for more than ten years developing methods to cost effectively recover clean water from the Salton Sea by distillation using geothermal heat as an energy source. This work has been funded by grants from the California Department of Water Resources and the United States Bureau of Reclamation. I've had the pleasure of learning about the Salton Sea both by reading scholarly articles and government reports and by working at the sea daily.

Every day after work I bike along the Salton Sea shore and enjoy watching flocks of pelicans glide in single file inches above the water against a gold and pink sunset reflected on the water. The Salton Sea is a place of stark beauty, stillness, and abundant life. The beauty of this environment deserves to be protected for future generations. This protection is fundamental to the Water Board's mission:

To preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations.

I know from my work that the water in the Salton Sea can be efficiently purified by distillation and returned to beneficial use. In the project we're undertaking with IID, we expect to show that the excess salinity in the Salton Sea can also be put to beneficial use by capturing solar energy to distill Salton Sea water into pure water to sustain habitat, while benefitting the air quality by covering dry lakebed with water efficient ponds. The roughly six million acre feet of water in the Salton Sea is a resource: a water resource, an environmental resource, and an economic resource.

The Salton Sea environment is under imminent threat when mitigation inflows stop after 2017 under the QSA agreements. The gradual rise in salinity seen since the early 20th century will accelerate. Salinity in the Salton Sea will rise at approximately a 50% higher rate than would occur without the QSA water transfers. Absent quick restoration action, the salinity will exceed 6% within a few years of stopping mitigation inflow. The millions of tilapia that foraging birds depend on are not expected to be able to reproduce above 6% dissolved salts. The Salton Sea is full of life now, and it probably will be in 2017. A responsible action would protect the life sustaining water quality for future generations beyond 2017.

After mitigation flows meant to offset QSA impacts stop, the rate of exposure of salt and contaminant laden Salton Sea lakebed will accelerate. The increase in the rate exposure of lakebed (playa) caused by QSA related water transfers will exceed 1,500 acres per year after 2017. According to the State's 2013 audit of the Salton Sea Restoration Fund, the total exposed playa will exceed 80,000 acres by 2030 if no restoration is undertaken. A substantial portion of that exposed playa will be a source of PM10 and PM2.5 dust blown into the communities that surround the Salton Sea. This will increase the already high rate of asthma and cause an increase in lung cancer. Most of the towns near the Salton Sea are disadvantaged communities ill equipped to cope with the public health threat that an unrestored Salton Sea will cause.

Protecting the public health is part of the Water Board's mission. Public health can be threatened by contaminants in water, but it can also be threatened by particulates and chemical contaminants formerly in water, then blown off a dry lakebed due to a lack of water. If no restoration or serious large scale mitigation effort is done, QSA water transfers will increase the threat to public health by reducing inflow to the Salton Sea causing an increase in the amount of playa exposed and an increase in the amount of PM10 and PM2.5 dust blown into surrounding communities. This is an environmental injustice permitted under Revised Order WRO 2002-0013 if this order is construed to be unconnected to a restoration and/or large scale mitigation effort that can prevent dust from blowing off the playa.

I respectfully request the State Water Resources Control Board to honor it's mission statement with respect to Revised Order WRO 2002-0013 and publicly acknowledge that the Order was executed with the understanding that the State of California would take responsibility to fund a restoration of the Salton Sea and would also appropriate funds sufficient to mitigate any QSA related impacts to the environment and the public health in excess of the \$133 million that the water agencies participating in the QSA water transfers agreed to pay. As the key regulatory agency for California's water resources, the State Water Resources Control Board has the power and the responsibility to preserve, enhance, and restore the quality of this California water resource, the Salton Sea.

Sincerely,

Tom Sephton
President, Sephton Water Technology, Inc.