



COMITÉ CÍVICO DEL VALLE

INFORMED PEOPLE BUILD HEALTHY COMMUNITIES

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December 30 2015

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STATE WATER RESOURCES CONTROL BOARD
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Re: Comment Letter Salton Sea

Comite Civico is an environmental justice organization that focuses on land use, air quality and health of the Imperial/Coachella Valley's. Comite Civico represents disadvantaged communities that have not had a meaningful voice in decisions that affect their environment. Salton Sea community is predominantly low income Latino population. Comite Civico submits these comments on behalf of its community members.

Although since our last meeting in March, we know there is still little chance of keeping the lake from shrinking, or from polluting Imperial and Coachella Valley and all of Southern California's air with toxic dust. But there has been activity in part by advocates for the Salton Sea, and we have seen some action such as Governor Brown appointing a long time Salton Sea Advocate to a key post and requested list of shovel ready projects, on November 5 the US Fish and Wildlife broke ground with a restoration project to cover 420 acres of exposed lakebed with water from the lake and the Alamo River, another was the passing of Bill AB1095 which requires Natural Resource Agency to submit to the legislature in 2016 a list of shovel ready as defined, Salton Sea Restoration projects, including project costs and project completion timelines there is still a lot more to be done!

The QSA has caused detrimental harm to disadvantaged communities living in the Salton Sea Air Basin. The "harm" includes increased risks to public health, economic stress, depletion of consumable fish, reduced ecological biodiversity and endangered species. ¹According to Barry Wallerstein, executive officer of the South Coast Air Quality Management District stated, "We now have solid evidence that clearly points to the Salton Sea as the source of a very large and unusual odor event". South Coast AQMD confirmed Salton Sea as the source of a widespread sulfur odor across more than 150 miles of the southland by air quality officials (9/11/12) AQMD News.

Air quality in both Imperial and Coachella Valley's still fail to meet Federal standards for clean air.. Imperial County is disproportionately burdened by having the highest childhood asthma hospitalization rate in California. By 2017 the Salton Sea will have a rapid decrease of water inflows resulting in a rapidly exposed seabed. The seabed has sediment from agricultural pesticide laden chemicals embedded in the seabed and are already being exposed.

Combined with ozone precursors such as carbon monoxide(CO), sulfur dioxide(SO₂), particulate matter (PM10, PM2.5), hydrogen sulfide (H₂S) and other harmful pollutants has resulted in a toxic hot spot.. The majority of population are low-income latino communities, who need to be made aware of these impacts and be given the chance to have their voice heard there were no notices in spanish.

The public health of the people in the Imperial and Coachella valleys will be critically affected from the State's failure to restore the Salton Sea. The decline of water levels resulting from water transfers under the Quantification Settlement Agreement (QSA) will expose thousands of acres of lakebed to the air. Emissions from this exposed playa will significantly worsen our region's already-poor air quality and cause many residents of the Imperial and Coachella valleys to suffer from heart disease, asthma, lung cancer, and other health problems. Both the direct financial costs (in the form of direct healthcare expenses and indirect costs associated with health care) and human costs (in terms of increased mortality, lost productivity, and so forth) will be substantial, and will be a major burden on the families, communities, businesses and local government in the Imperial and Coachella valleys. That is the harsh reality facing our region. According to the ² California Department of Public Health, Border Asthma & Allergy Study, Imperial County has the highest rate of childhood asthma hospitalization admission in California. Nearly 85% of these hospital admission occurred among latino children.

Environmental Justice and Public Participation

The QSA never included Environmental & Climate Justice or community capacity building, and accordingly, there has been very little public participation but we are also reaching a point where we need something done now we cannot wait until 2017. ⁴ The California Environmental Protection Agency (EPA) identifies community capacity building as efforts to engage disadvantaged population to help them better identify and meet the needs of their areas. It includes building on existing skills, providing education on issues and processes and helping them communicate effectively in the public realm. At any level capacity building refers to ensuring the State is responsive and accountable to all stakeholders, that all agencies involved in the QSA and officials are informed about issues of concern for their communities, and that communities are aware and informed of issues affecting them.

The Governor's Office of Planning and Research 2003 General Plan Guidelines ⁵ (http://opr.ca.gov/docs/General_Plan_Guidelines_2003.pdf) provides recommendations regarding public engagement for environmental justice communities. These include: scheduling public meetings on key issues affecting the public at times and locations most convenient to community members, providing child care, and building community partnerships. It is key that translation and interpretation services are provided at public meetings on issues affecting populations whose primary language is not English. All community. This includes any advertising and written background materials. If some documents are infeasible to translate in their entirety, the planning agency should consider translating an executive summary in the major languages spoken in the community. Translation time should not be taken from participants' time limits for comments.

CALIFORNIA LAW DEFINES ENVIRONMENTAL JUSTICE AS;

"The fair treatment of all races, cultures and income with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies (Government Code section 65040.12 and Public Resources Code section 72000). In conformance with this law, it is the ⁶California Natural Resources Agency's policy that the fair treatment of people of all races, cultures, and income be fully considered in planning, decision making, development, and implementation of all Natural Resources Agency programs, policies, and activities. The intent of this policy is to ensure that the public, including minority and low-income populations, are informed of opportunities to participate in the development of all Natural Resources Agency programs, policies, and activities, and that they are not discriminated against, treated unfairly, or caused to experience disproportionately high and adverse human health or environmental effects from environmental decisions (California Department of Water Resources [DWR] and California Department of [DFG]2007)

Climate Change

Climate Change presents new challenges for managing natural resources and protecting biodiversity, "pacific flyway" and endangered species at risk. Climate Change affects social development factors such as poverty and is particularly evident in disadvantaged communities such as Imperial County. ⁸ Because climate change does not affect everyone equally, the adverse impacts of climate change are expected to disproportionately affect

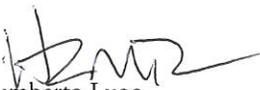
those who are socially and economically disadvantaged, including the poor, the elderly, children, traditional societies, agricultural workers and rural populations (OEHHA).

Public Health, Salton Sea Restoration and Economic Priority

Comite Civico del Valle and the IVAN (Identifying Violations Affecting Neighborhoods) priority is the public health of the people in the Imperial and Coachella valleys will be critically affected from the State's failure to restore the Salton Sea. The decline of water levels resulting from water transfers under the Quantification Settlement Agreement (QSA) will expose thousands of acres of lakebed to the air. Emissions from this exposed seabed will significantly worsen our region's already-poor air quality and cause many residents of the Imperial and Coachella valleys to suffer from heart disease, asthma, lung cancer, and other health problems. Both the direct financial costs (in the form of direct healthcare expenses and indirect costs associated with health care) and human costs (in terms of increased mortality, lost productivity, and so forth) will be substantial, and will be a major burden on the families, communities, businesses and local government in the Imperial and Coachella valleys. That is the harsh reality facing our region.

Thank you

Sincerely,


Humberto Lugo
IVAN Statewide Coordinator

¹<http://articles.latimes.com/2012/sep/12/local/la-me-smell-20120912>

²http://www.ehib.org/project.jsp?project_key=BAST01

³http://www.waterboards.ca.gov/board_info/agendas/2015/mar/031815_12.pdf

⁴<http://www.calepa.ca.gov/EnvJustice/Documents/2004/Strategy/Final.pdf>

⁵http://opr.ca.gov/docs/General_Plan_Guidelines_2003.pdf

⁶http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Environmental_Justice_Policy_-_California_Natural_Resources_Agency.sflb.ashx

⁸<http://www.oehha.ca.gov/multimedia/climate/index.html>