

Responses to Public Comments on Draft EA

Appendix 1-H:
Responses to Public Comments on Draft EA

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
1	6/28/2022	Email	Erin Woolley	<p>I am writing to respectfully request an extension of the public comment period on the Draft Environmental Assessment for the SSMP 10 year plan. Please see the attached letter, submitted on behalf of Sierra Club California, Leadership Counsel for Justice and Accountability, Kounkuey Design Initiative, and Audubon California.</p> <p>I would appreciate confirmation that you have received the attached letter.</p>	The public comment period was extended to August 20, 2022. Confirmation was provided on July 6, 2022.
1-1	6/28/2022	Letter	<p>Erin Woolley Policy Advocate Sierra Club California</p> <p>Mariela Loera Policy Advocate Leadership Counsel for Justice and Accountability</p> <p>Lauren Elachi Design Principal Kounkuey Design Initiative</p> <p>Andrea Jones Audubon California</p>	<p>Request for Extension of Time to Provide Public Comment on the EA for the SSMP 10-Year Plan.</p> <p>On behalf of the undersigned organizations, we respectfully request a 30-day extension of time to provide public comment on the Draft Environmental Assessment (EA) for the SSMP 10-year plan. Our organizations are heavily engaged with the SSMP and with communities affected by the crisis at the Salton Sea, and are committed to ensuring that this public engagement process is as fruitful as possible for all stakeholders. The EA was circulated for public review on June 21, 2022, with the deadline for public comment July 21, 2022. The 30 day comment period takes place during the summer season and overlaps with the July 4th holiday. Many organizations and community members will not have the ability to adequately review the EA during this short time, let alone have the ability to engage meaningfully in providing feedback as expected from this process. The Environmental Assessment is an important step in developing a plan to address the ongoing public health and environmental crisis at the Salton Sea, and fundamental to its success is the ability of all stakeholders to engage in this process. CNRA has referenced the NEPA process in its Annual Report and directed our organizations to participate in the public comment process to provide detailed feedback on development of the SSMP projects. Our organizations have been eagerly awaiting this document's release for many months, and need to have adequate time to provide meaningful feedback. Extending the public comment period would also represent a meaningful gesture to promote our shared goals of increasing transparency and community engagement in the SSMP and development of the 10 year plan. For these reasons, we request to extend the comment deadline to August 20, 2022. Please provide us with a decision no later than July 6, 2022.</p> <p>Thank you in advance for your consideration of this request.</p>	The public comment period was extended to requested deadline of August 20, 2022 and notification was provided on July 6, 2022.
2	7/7/2022 (day)	Public Meeting no. 1, Q&A	Jenny E. Ross	FYI, the sound quality is poor. Very blurry.	Comment noted. This issue was addressed during the meeting.
3	7/7/2022 (day)	Public Meeting no. 1, Q&A	Joan Speer	How have you addressed the methane emission problem?	Methane is discussed in general in the Final EA in the following sections (note that section numbers have changed from the Draft EA): Section 4.2.2.2 (Existing Conditions for Climate Change and Greenhouse Gas Emissions), Section 4.10.3.2 (Existing Conditions for Public Health), Section 4.10.3.3 (Existing Conditions for Gas Release from Water Surface), Section 5.2.1 (Effects Methodologies for Air Resources), Section 5.10.1 (Effects Analysis Methodology for Hazardous Waste and Materials), and Effect HAZ-2 (Project construction could encounter contaminated soils during soil excavation) which addresses potential exposure to construction workers and any members of the public in the immediate vicinity. Mitigation for this impact is provided in MM HAZ-3 which is to provide worker training for those who may be exposed to releases of gases from soils or airborne diseases from soil excavation. The text for MM HAZ-3 has been updated.
4	7/7/2022 (day)	Public Meeting no. 1, Q&A	Joan Speer	Thank you for your very thorough presentation. Will the dust suppression efforts be enough to make a real difference in chronic air pollution?	The projects are being implemented to reduce the amount of emissive exposed lakebed and to reduce the total emissivity of exposed lakebed. See Air Resources Section 5.2 in the Final EA for the effects of the project on Air Quality. As discussed in Section 4.2.1.3 (Existing Conditions for Air Resources) of the Final EA, agricultural operations nearby are a significant source of pollutant emissions, as is the transport of pollutants from Mexico. Several agencies including the air districts, IID, and the State are working on projects to reduce airborne particulate matter.

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5	7/7/2022 (day)	Public Meeting no. 1, Q&A	Jenny E. Ross	Please discuss the amounts of water required annually for each component of each alternative.	Water demand is addressed in the Final EA for the Proposed Project and alternatives in revised Appendix C [was Appendix F in Draft EA] (Salton Sea Elevation and Salinity Modeling and SSMP Projects Water Demand Modeling Memo), as well as in multiple sections, specifically Section 3.17 (Project Water Demands, Water Availability, and Water Agreements) and Section 5.16 (Water, Effects Analysis) (this was Section 5.12 in the Draft EA). Refer to Table 3-7, which presents the water balance by Project Component and by Alternative. Appendix C provides additional details of modeling results and water demand calculations.
6	7/7/2022 (day)	Public Meeting no. 1, Q&A	Joan Speer	I can see that this is a very complex situation. Wouldn't ocean import address many of the issues? It seems like ocean water import is not being seriously considered?	Water importation is outside the scope of the SSMP 10-Year Plan and therefore outside of the scope of this EA. The State is considering water importation under its Long-Range Plan. The Public Draft Long-Range Plan was released for comment on December 15, 2022, and finalized in April 2024; cited as CNRA et al. 2024.
7	7/7/2022 (day)	Public Meeting no. 1, Q&A	Jenny E. Ross	Please clarify the types of greenhouse gas emission sources that were analyzed for the EA. It appears that only human-related GHG sources (e.g. sources related to construction and maintenance operations) were considered. It appears that GHG sources such as exposed lakebed, rewetted lakebed, and impounded waters were not considered in the effects analysis. Please clarify whether this is correct or not by stating the types of GHG sources that were analyzed.	Table 4-8 in the Final EA (formerly Table 4-17 in the Draft EA) provides a summary of greenhouse gas regulatory requirements applicable to the project. While the Council on Environmental Quality (CEQ) provides informal guidance to federal agencies in their consideration of the effects of GHG emissions and climate change when evaluating proposed federal actions in accordance with NEPA, there are currently no significance thresholds set forth by a federal agency by which to make a significance determination. The issue is discussed only qualitatively in the EA. Construction activities would result in temporary GHG emissions, and would be minimized by adhering to the following mitigation measures in the EA: MM AQ-1 (Implement Diesel Control Measures to Reduce PM10 and NOx Emissions from Diesel Engines) and MM-AQ-2 (Implement Standard dust suppression activities during ground disturbance and at the end of each workday). In addition, as the exposed lakebed dries, it would generate GHG emissions, but this is not discussed or analyzed because it is not part of the project, instead it is a naturally occurring event. However, implementation of the project would cover some of the exposed lakebed thereby reducing GHG emissions in these areas. Additional analysis of GHG emissions from these sources has been presented in the Long-Range Plan, cited as CNRA et al. 2024, released in April 2024.
8	7/7/2022 (day)	Public Meeting no. 1, Q&A	Jessica Humes	Will today's PowerPoint be available after this meeting?	The PowerPoint is available online at: https://www.spl.usace.army.mil/Portals/17/docs/regulatory/Projects/SSMP/SSMP-10-Yr-Plan_Public-Meetings_Slideshow_Eng_Esp-Translation_Corps_Jul-2022.pdf?ver=Cpj-exRAqm4syR89UHNDQ%3d%3d
9	7/7/2022 (day)	Public Meeting no. 1, Q&A	Karina Quintanilla	What is the workforce impact? Addressing ecology and environmental impact are moot if there are not people available to fill the positions. These candidates may not be living locally. The jobs will not only be for a one-year contract, this will be an ongoing project. This is not an issue that is isolated to addressing 15K acres.	As discussed in Section 5.6.3.1 (Proposed Project, Socioeconomics, Effects Analysis) of the Final EA (note that section numbers have changed from the Draft EA), the Proposed Project and alternatives would create jobs, primarily during construction, and would not result in the loss of jobs or adversely affect the local economy. Construction workers may come from within or outside the regional project areas depending on the timing, location, and nature of the work. The Proposed Project and alternatives would increase birding habitat and recreation opportunities which would potentially expand the job market and increase tourism which could bring money into the local economy. Improvement in air quality would improve living conditions which would potentially attract more people to live in the area, or prevent out-migration, which could stabilize or grow the local economy.
10	7/7/2022 (day)	Public Meeting no. 1, Q&A	Jenny E. Ross	When the SSMP seeks a permit to move ahead with one of the 10-year plan project alternatives and that project has been modified in relation to what is presented in the EA, will there be an additional opportunity to comment?	There will not be an additional public comment opportunity through this NEPA and LOP process. There may be other opportunities outside of the NEPA process such as local or State meetings or community engagement meetings, or if additional NEPA is needed. Public outreach/public involvement for the project is discussed in Section 8.7 of the EA.

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11	7/7/2022 (day)	Public Meeting no. 1, Q&A	Chuck Parker	After the long-range plan process comes to an end, will the selected plan need to go through an Army Corps NEPA review or CEQA review. More years of delay?	This topic is outside of the scope of the SSMP 10-Year Plan and therefore outside of the scope of this EA. Additional environmental analysis will be determined as part of the Long-Range Plan environmental review process. For more information on the Long-Range Plan, refer to https://saltonsea.ca.gov/planning .
12	7/7/2022 (day)	Public Meeting no. 1, Q&A	JZ	Can you share links to the available documents?	Links were provided during the meeting. Draft EA and appendices are available at: https://saltonsea.ca.gov/2022/08/army-corps-of-engineers-extends-public-comment-period-on-draft-environmental-assessment-to-august-20-2022/
13	7/7/2022 (day)	Public Meeting no. 1, Q&A	Suzanne	Only hosts and panelists can see the Q&A so posting a link here will not help. You can refer them to your website.	Comment noted. This issue was addressed during the meeting.
14	7/7/2022 (day)	Public Meeting no. 1, Q&A	Stephanie Martin	There is an 'all questions' and 'my questions' tab.	Comment noted.
15	7/7/2022 (evening)	Public Meeting no. 2, Q&A	Lynne Brickner	Will the presentation slides be made available to the public?	The PowerPoint is available online at: https://www.spl.usace.army.mil/Portals/17/docs/regulatory/Projects/SSMP/SSMP-10-Yr-Plan_Public-Meetings_Slideshow_Eng_Esp-Translation_Corps_Jul-2022.pdf?ver=_Cpj-exRAqm4syR89UHNDQ%3d%3d
16	7/7/2022 (evening)	Public Meeting no. 2, Q&A	Czar	Will the particulate particle monitors in project areas be available to the public and tailored to warn the people near of the danger in the air, like some of the schools have? if not why not?	The program is currently collecting air quality data on areas of exposed lakebed, including where some dust suppression and vegetation enhancement projects are underway. Section 3.15.1 (Monitoring and Adaptive Management) of the EA describes the monitoring proposed for the SSMP projects. This will include collecting data on particulate matter concentrations, wind direction and speed, temperature, relative humidity, and precipitation for the purpose of evaluating performance effectiveness of dust suppression projects. It will not include information on other types of pollutants, which are monitored by local air quality districts. None of the SSMP-related monitoring includes reporting out warnings to the public, although local air quality districts do report such information. Air quality monitoring data will be open to the public following California open data portals requirements. Refer to https://data.ca.gov/ for additional information.
17	7/7/2022 (evening)	Public Meeting no. 2, Q&A	Czar	Why is there no public notice of these projects like billboards or other public access media. Like signs for any other project there should be signs far and wide around the sea yet...	Advertisement for the public meetings was provided in both English and Spanish via digital and physical flyers, advertisements, mailers, social media ads (www.facebook.com/SaltonSeaCOEE/), radio PSA (Public Service Announcements), and in-person outreach to inform the community about these meetings. Information/interpretive signs are being made to be placed at project sites. To receive SSMP updates for the latest on project delivery, upcoming meetings, opportunities to provide input and more, sign up at: https://public.govdelivery.com/accounts/CNRA/signup/29107
18	7/7/2022 (evening)	Public Meeting no. 2, Q&A	Lynne Brickner	Which agency will make the decision as to choice of the five Alternatives under consideration?	The Corps is the lead federal agency for the NEPA process for the SSMP 10-Year Plan. The Final EA identifies and analyzes all of the alternatives being considered which includes a range of projects and activities, and has been revised based on substantive public comments that are related to the analysis performed or for clarification purposes. CNRA is the applicant and is the agency that will select the projects within the range of alternatives to be implemented.
19	7/7/2022 (evening)	Public Meeting no. 2, Q&A	Czar	The adverts should be directly aimed at saying the Salton Sea is changing with all the agencies involved and a single site to find all available info. Everything is spread so far it seems deliberate for confusion. Especially the difficulty with translations... this state belonged to Mexico, Spanish is not new to the area...	The CNRA site contains links to all the relevant information at https://saltonsea.ca.gov/ , including most documents in Spanish. Advertisement for the public meetings was also performed in both English and Spanish via digital and physical flyers, advertisements, mailers, social media ads (www.facebook.com/SaltonSeaCOEE/), radio PSA's, and in-person outreach to inform the community about these meetings. Information/interpretive signs are being made to be placed at project sites. To receive SSMP updates for the latest on project delivery, upcoming meetings, opportunities to provide input and more, sign up at: https://public.govdelivery.com/accounts/CNRA/signup/29107

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20	7/7/2022 (evening)	Public Meeting no. 2, Q&A	Czar	Is there a site for the grants available to educate people about the SSMP?	There are two State agency websites, one at CNRA https://saltonsea.ca.gov/ and one at DWR https://water.ca.gov/saltonsea/ . These websites are different than the Corps website where the public notice can be accessed for this NEPA and permitting process. The public notice for the EA is available at https://www.spl.usace.army.mil/Media/Public-Notices/Article/3066981/spl-2019-00951-kjd-salton-sea-management-program-phase-i-10-year-plan/ As of right now, there are no websites for identifying grants related to the SSMP.
21	7/7/2022 (evening)	Public Meeting no. 2, Q&A	Czar	Has the drought projects for the state and others connected to the Colorado River been taken into account? As heat brings dryness the less green spaces the higher the winds and so on. At the Salton Sea Summit we were told the dust here already reaches San Diego.	The water balance presented in updated Appendix C (was Appendix F in Draft EA) for years 2023 through 2046 incorporated assumptions for changes in inflows over time with projections past year 2070. This Appendix has been updated in the Final EA and the hydrology scenarios consider reductions due to the expected 2023-2026 voluntary water savings from the Colorado River due to the on-going drought. The projects are being implemented to reduce the amount of emissive exposed lakebed and to reduce the total emissivity of exposed lakebed. See Effects Analysis Section 5.2 (Air Resources) in the Final EA for the effects of the project on Air Quality (note that some section numbers have changed from the Draft EA). Additional analysis has been provided regarding the air quality benefits of these projects.
22	7/7/2022 (evening)	Public Meeting no. 2, Q&A	Tom Sephton	Are the SSMP proposed projects adequately planning to address the challenge of selenium bioaccumulation and water column accumulation in habitat ponds fed by New and Alamo River water that can exceed EPA standards.	Table 4-28 in Section 4.10.3.2 (Public Health section of the Hazardous Waste and Materials section) of the Final EA (note that section numbers have changed from the Draft EA) provides a comparison of estimated safe fish and duck consumption rates and advisories for selenium concentrations in fish and ducks at the Salton Sea. Section 5.10 (Hazardous Waste and Materials, Effects Analysis) states that concentrations are below the OEHHA thresholds and within the range determined to be safe for expected human consumption. As discussed in the EA, the Proposed Project would not increase the levels of these constituents, and therefore, would not increase human health risk exposure related to consuming fish or wildlife from the ponds.
23	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Morgan Capilla	Hi, just to confirm - was the commenting period for the Draft EA extended through August 20?	The following response was provided during the live meeting: That is correct. You may submit public comments to spregssmp@usace.army.mil by 5:00 p.m. on August 20, 2022. To review the Draft EA and Letter of Permission Procedures visit: https://urldefense.com/v3/_https://www.spl.usace.army.mil/Missions/Regulatory/Projects-Programs/*22.07/12/2022_!JQ!!PwxmruxY!YhuQ_McaTSfOgzANw3HJBs_bxNQ!wIL5UH5vWZRBcEkequNAXwr7PYZr5rS9VjjN8i87cJJAdi_-SnV\$
24-1	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Nikola Lakic	NOTE: for July 12, 2022 – SSMP 10-Plan - U.S. Army Corps of Engineers (Corps), EPA, National Environmental Policy Act (NEPA) – Community Meeting. Thank you for the opportunity to say a few words again. I am preparing a written comment, but I will use this opportunity to insert a few paragraphs from my written comment. On the flyer for the (3) meetings, it says: “Learn More + Participate in the Environmental Review Process”. It also says: “SSMP 10-Year Plan and Environmental Assessment.” In previous meetings, I was able to say a few words and I am thankful for those opportunities. I did mention the disconnect between two projects a) Extraction of Lithium and b) Restoration of the Salton Sea.	Comment noted.

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24-2	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Nikola Lakic	<p>Without going into accusations and details of who is accountable for the current grave situation, it is important to say that radical changes need to be done if we want to save and restore the Salton Sea, protect our environment and the health of the local population, and to accomplish the state's primary goal of almost 100% renewable energy. There is a fundamental disconnect between the "current course of action" and what should be done and how. Current setup:</p> <p>Several agencies including the SSA, IID, Tetra-Tech, CNRA, and a few additional supporters, after 20 years of designing and redesigning are openly claiming contribution and credit for their masterpiece design - the "Perimeter/Brine Lake".</p>	Comment noted.
24-3	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Nikola Lakic	<p>NOTE: The "Perimeter/Brine Lake" is a single snake-like "U"-shape Lake consisting of a South part, the Western part, the North part, and the Eastern part. It has a perimeter wall with the function of funneling the New River and Alamo River around the periphery of the Lake into the Central part which is the Brine Lake. Before reaching permanent size, Brine Lake will be smaller, saltier, smellier, and more polluted every year leading to ecological disasters with tremendous consequences and liabilities. I am sorry to say that such a design is a non-sensical concept.</p> <p>Monitoring increased salinity and pollution does not make sense. First, we need a plan on how to decrease salinity and pollution. That is what I am providing.</p> <p>The concept of the "Perimeter/Brine Lake" was "somehow" officially accepted by several agencies in 2016.</p>	Addressing salinity and pollution are outside the scope of the SSMP 10-Year Plan. As discussed in Section 2.1, Purpose and Need, of the EA, the purpose of the SSMP 1-Year Plan is to implement a minimum of 29,800 acres of habitat restoration and dust suppression projects on lakebed areas that have been, or will be, exposed at the Sea by 2028. The need for the project is to provide habitat for species that depend on the Sea and to reduce dust emissions that may affect public health. Project alternatives were developed to meet this purpose and need and were developed with public comment and input in the fall of 2020. Furthermore, broader issues related to the overall Salton Sea are addressed in the Public Draft Long-Range Plan, released for comment on December 15, 2022, and finalized in April 2024.
24-4	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Nikola Lakic	<p>Also, it is important to mention that such a decision was made without considering my design and without public and relevant agencies knowing about the existence of my proposal.</p> <p>It was well known and documented that the "Perimeter/Brine Lake" will shrink substantially and will have exposed lakebed (playa) – about 200 square miles.</p> <p>According to their (SSMP) and a 10-year plan, the same proponents proceeded with supporting projects to mitigate the formation of toxic dust storms by planting plants and ruffling the surface bringing obstacles such as haystacks on the playa as we have seen during these presentations.</p> <p>The plan is to mitigate about 9 square miles but has difficulties finding water from depleting groundwater (wells) and occasional stormwater.</p> <p>They are hoping that if they get money from the government to continue designing for another 20 years that they will somehow figure out how to find water to mitigate toxic dust storms for the remaining 100 + square miles of the playa.</p>	Any proposal associated with importing water, and decreasing salinity and pollution is outside the scope of the SSMP 10-Year Plan and therefore outside the scope of this EA. Long-range solutions, including water importation, are being considered in the Long-Range Plan. Refer to response to comment 6.
24-5	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Nikola Lakic	<p>I can tell you with certainty that Santa Claus is busy making toys and will not help with needed water. Based on some recent development, it appears that those who promote the "destruction" of the Salton Sea intend to continue designing as it goes – possible for another 20 years. I am sorry if this sounds sarcastic – it is not my intention to mock anyone – but, it is absolutely true and well documented.</p> <p>I would like to mention that the concept for the restoration of the Salton Sea already existed since 2013 and the preliminary plan since 2016 and 2018.</p> <p>We cannot lose time anymore. It is time for finding a reputable contractor(s) for its implementation.</p> <p>I respectfully urge the U.S. Army Corps of Engineers (Corps) and EPA not to succumb under the big pressure of those who want to get rid of the Salton Sea under the disguise of restoring the Salton Sea.</p>	Comment noted.
25	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Michael & Molly	Define deep water depth, mid-level also	Mid-depth habitat and deep-water habitat are described in Section 3.3.1.2 (Aquatic Habitat Restoration Types and Features) of the EA. Mudflats and shallow water habitats would have a water depth of less than 6 inches. Mid-depth habitat would have water from 6 inches to 4.5 feet deep. Deep water habitat would have a depth greater than 4.5 feet.
26	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Delic	In the report the changes in humidity due to influx of water was not highlighted as a factor in turning wildlife away.	Intensive agricultural irrigation and high evaporation rates currently contribute to high humidity in summer months. Wildlife are averting due to rising salinity levels of the Sea and not due to fluctuations in humidity.

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27-1	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Cesar Beltran	Good afternoon, on behalf of the Comunidad Mayor Indigena Cucapah, the indigenous community that owns the vast majority of land in the Laguna Salada. For the restoration project, I would like to thank the U.S. Army Corps of Engineers for this opportunity of exchanging and sharing information in order for everyone interested in this project can have a good lead on what to do how to proceed and what to expect. We are the native indigenous community, the Cucapah Community, in Mexicali, Baja California, Mexico.	Comment noted.
27-2	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Cesar Beltran	As I mention before, we are the owners of the of a great surface of land and the Coyote Canal where many projects are planned to be done. Nevertheless several companies have been banned from our community or have fail to establish a proper and formal agreement with us and are still using our honorable name within their projects.	Comment noted.
27-3	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Cesar Beltran	My question in this matter would be who can we contact or talk to in order to establish a well organized and legal cooperation for the development of this project? It is in our best interest to see this project be a reality and carried out for ourselves and the generations to come as well as the preservation of our environment.	We acknowledge the importance of protecting and maintaining rights reserved by or granted to Indian tribes or Indian individuals by treaties, statutes, and executive orders. The Corps has added Comunidad Mayor Indígena Cucapah (Mexicali, Baja California, Mexico) to the list of tribes requesting consultation. The Corps contacted Mr. Beltran on October 14, 2022, October 25, 2022, and November 9, 2022 via email.
27-4	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Cesar Beltran	Thank you Eileen for this presentation My email is [REDACTED (b)(6)] Best regards	Comment noted.
28	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Tom Sephton	The link to the EA on the SSMP website, materials e-mailed out by the State staff, and what you just posted here is not working. How can we get a copy of the EA documents?	This issue was addressed during the meeting. Draft EA and appendices are available at: https://saltonsea.ca.gov/2022/08/army-corps-of-engineers-extends-public-comment-period-on-draft-environmental-assessment-to-august-20-2022/
29	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Feargod	Has the board thought about shade balls like the LA river?	The topic of water conservation techniques for drinking water reservoirs is outside the scope of the SSMP 10-Year Plan and therefore outside the scope of this EA.
30-1	7/12/2022 (evening)	Public Meeting no. 3, Q&A	David Roman	Yes we can hear thank you.	Comment noted.
30-2	7/12/2022 (evening)	Public Meeting no. 3, Q&A	David Roman	What further specification of current Salton Sea, New River & other tributaries can be made available to assist us in preparing proposals aligned to SSMP? For example, seasonal dimensions, flow/current dynamics & water composition in the Salton Sea & its tributaries? How would we go about confirming those details?	This comment is outside of the scope of the Environmental Assessment.
31	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Tom Sephton	Hello Melinda, Thank you this link also fails	This issue was addressed during the meeting. Draft EA and appendices are available at: https://saltonsea.ca.gov/2022/08/army-corps-of-engineers-extends-public-comment-period-on-draft-environmental-assessment-to-august-20-2022/
32	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Delic	The website needs to have its cache cleared. it will not work for everyone unless its cleared	Comment noted.
33	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Delic	This link works but when you try to send the link to other people its broken	Comment noted. This issue was addressed during the meeting.
34	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Tom Sephton	Thanks for this link. It failed in Google Chrome but worked in Microsoft Edge after removing a "web threat" extension.	Comment noted.
35	7/12/2022 (evening)	Public Meeting no. 3, Q&A	David Roman	The alternatives presented seem to focus on the edges/banks, coastal areas around the sea. Are the sea proper & tributary sources out of scope for this first phase of the SSMP? Or would remediating the sea & rivers themselves be included in the initiatives/alternatives considered (e.g. holistic balancing of pollutant neutralization, aquatic life proliferation, ecosystem balance and emissions reduction)?	Remediation of the Sea and tributary rivers is outside the scope of the SSMP 10-Year Plan and therefore outside the scope of the EA.
36	7/12/2022 (evening)	Public Meeting no. 3, Q&A	Feargod	am writing a film about the salton sea i am making a monster movie like the 1957 film the monster that challenged the world I am talking with Ryan Brandt he is very interested [PERSONAL CONTACT INFORMATION REDACTED (b)(6)].	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
37	7/12/2022	Email	Jim Sullivan, TMDC Inc.	I would like to submit a concern about access on the roads that will be built and used by the agencies for construction and maintenance of the project. It would be critically important to have all roads gated, and only authorized personnel driving in the area(s). If this project is going to have any value for wildlife it will be important that traffic and access be minimal and that people are not moving or harassing the birds and wildlife that will be using the limited space that is going to be created by the Project.	The following language has been added to Effect BIO-8 (Project construction and operation would have minor effects on common fish and wildlife species) in Section 5.4.2 of the Final EA to address this comment: "In addition, maintenance roads could serve as access for the public which may allow for harassment of birds and other wildlife. Therefore, projects sites will be gated or designed to limit public access where such access is not appropriate. Areas will be designated to the public as open or closed to minimize wildlife effects."
38	6/22/2022	Email	Lee Shenk	One way to help conserve water in the Colorado River and/or to supply clean water to the Salton Sea would be to recycle agricultural runoff from farmlands in California's Imperial Valley. Agricultural runoff could be passed through a distilling plant and reused since the distilling process would remove any contaminants in the runoff water. Obviously, distillation can be an expensive process since it requires a lot of energy, however California's Imperial Valley has massive geothermal reserves that could be used to cheaply provide the heat energy required for distillation. Since the Salton Sea receives over 100K acre-feet per year in agricultural runoff a distilling plant could produce a significant amount of clean water for the Sea or for reuse in agriculture.	Comment noted. Water distillation is outside the scope of the SSMP 10-Year Plan and therefore outside the scope of this EA. Water quality and supply within the U.S. and geothermal energy are outside the scope of the Corps federal action of whether to issue Department of the Army (DA) permits for discharges of dredged or fill material associated with the implementation of aquatic resource restoration or dust suppression projects proposed under the SSMP 10-Year Plan. The effects of the federal actions on water quality and supply are considered in Sections 3.17. 4.16, and 5.16, and energy in Sections 4.8, and 5.8 of the Final EA. The Long-Range Plan includes evaluation of a concept (Concept 7A) that relies on distillation. For more information on the State's Long-Range Plan, refer to https://saltonsea.ca.gov . The Public Draft Long-Range Plan was released for comment on December 15, 2022, and finalized in April 2024.
39	7/1/2022	Email	Lyudmila Garcia, GreenTerra Realty	<p>Your 10 year plan is really good in other overlay grounds - it's not good in Lithium Salar overlay ground like CA Salton Sea Lake.; indeed, lake's water is 50% saltier than sea with other minerals that harmful for public health.</p> <p>All Fresh Water will become saltier with many toxics minerals that cannot support life like fish and people cannot drink water or swim in the man made lake.</p> <p>"In Chile and Argentina lithium comes from salt deserts, so-called SALARS."</p> <p>(https://www.volkswagenag.com/en/news/stories/2020/03/lithium-mining-what-you-shouldknow-about-the-contentious-issue.html#)</p> <p>In addition, "A new USGS study reports that about 45% of public-supply wells and about 37% of U.S. domestic supply wells have concentrations of lithium that could present a potential human-health risk."</p> <p>(https://www.usgs.gov/news/lithium-us-groundwater)</p>	Comment noted. Water quality and supply within the U.S. and lithium concentrations in the Sea are outside the scope of the Corps federal action of whether to issue DA permits for discharges of dredged or fill material associated with the implementation of aquatic resource restoration or dust suppression projects proposed under the SSMP 10-Year Plan. The effects of the federal actions on water quality and supply are considered in Sections 3.17. 4.16, and 5.16, and minerals are considered in Sections 4.9, 5.9, and 6.10 of the Final EA.
40	7/1/2022	Email	Lyudmila Garcia, GreenTerra Realty	Your \$800 million 10 year Plan will have adverse and Hazards Effects like throwing money in to the trash can. Why do you believe to make part of 3% Global Fresh Water is important to make it saltier in Mega Drought?	Comment noted. Refer to Chapter 2 of the EA for a discussion of Project Purpose, Need and Objectives and Chapter 5 for the effects analysis.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
41-1	7/6/2022	Email	Jeff Geraci	<p>The State’s erroneous notion that the construction of hazardous aquatic habitat at Salton Sea is more beneficial and less harmful to wildlife than the absence of such habitat is baseless conjecture that contradicts scientific data. Surrounding land use for the proposed project site of the 10 Year Plan includes more than half a million acres of agricultural land and more than 1500 miles of polluted agricultural drains that will convey contaminants such as metals and pesticides into newly constructed ponds. This is unequivocally incompatible with creating and sustaining sound aquatic habitat.</p> <p>The US Army Corps of Engineers must not permit these hazardous dredged sediments and discharges to be used for constructing toxic aquatic habitat. The State is merely seeking a ‘quick and easy’ way around established procedures and regulations, but the State must not be granted special favors or exemptions by the US Army Corps that are denied to the public; previous public requests to utilize identical discharges for the creation of aquatic habitat in the same Salton Sea region have been summarily rejected by the USEPA, citing a concern for wildlife safety. I urge the US Army Corps of Engineers to remain consistent and diligent in the equal application of environmental regulations by prohibiting all proposed discharges prescribed by the State’s SSMP 10 Year Plan and to immediately cease development of new LOP procedures associated with the SSMP 10 Year Plan.</p>	<p>Comment noted. The Sea currently supports a variety of bird species and a limited aquatic community. Over many decades, the composition of the aquatic community has shifted in response to receding water levels and increasing salinity. The State will obtain water quality certification pursuant to section 401 of the CWA from the Colorado Basin Regional Water Quality Control Board for each phase of the Proposed Project. All conditions of the water quality certification will be implemented to minimize adverse impacts to water quality associated with the Proposed Action.</p> <p>In accordance with 40 CFR §230.60, where the discharge site is adjacent to the extraction site and subject to the same sources of contaminants, and materials at the two sites are substantially similar, the fact that the material to be discharged may be a carrier of contaminants is not likely to result in degradation of the disposal site. As proposed, dredged material to be used to construct aquatic habitat or dust suppression projects would be sourced from the same or adjacent locations as where the material would be placed. Consequently, chemical and biological testing of the soil is not required.</p> <p>Refer to Final EA Section 2 for Project Purpose, Need and Objectives. The Purpose of the State’s SSMP 10-Year Plan differs from other projects and plans involving site remediation for agricultural, or constructed water quality treatment projects. Refer to EA Section 2.2, Project Goals and Objectives subset of goals: support a sustainable, productive aquatic community; provide suitable water quality for fish; design and create habitat and habitat connectivity that support desert pupfish; minimize the risk from selenium toxicity impacts; minimize the risk from disease/toxicity impacts; and adaptively manage the projects under the SSMP 10-Year Plan. Additionally, refer to the following sections in the Final EA for a discussion of hazardous waste and materials impacts associated with this project: Sections 4.10.3.1 (Hazardous Materials, Existing Conditions) and 5.10 (Hazardous Waste and Materials, Effects Analysis), and specifically Effects HAZ-1 (Hazardous materials used during construction and operations could be released into the environment), HAZ-2 (Project construction could encounter contaminated soils during soil excavation), and HAZ-8 (Selenium and DDE levels in ponds could cause increased selenium and DDE levels in sport fish and waterfowl using the ponds).</p>
41-2	7/6/2022	Email	Jeff Geraci	<p>1. The SSMP 10-Year Plan Threatens Wildlife and is More Environmentally Damaging than a ‘Do-Nothing’ or ‘Relocation’ Alternative. The greatest fatal flaw of the SSMP 10-Year Plan is that it proposes to repurpose contaminated agricultural, industrial, and municipal waste for use as aquatic habitat, which is in direct conflict with USEPA guidance that waste storage and habitat are incompatible uses for a waterbody. The wastewater that will be used to sustain so-called ‘habitat’ under the 10-Year plan is already deemed hazardous to wildlife, containing high concentrations of metals and pesticides that exceed aquatic life thresholds established by the USEPA. Even the USEPA explicitly warns against using such water as habitat: <i>“Constructed wetlands that receive water containing large amounts of trace metals or pesticides should be fenced off or otherwise barricaded to discourage wildlife use. In fact, if there is a significant potential for contamination or other detrimental impacts to wildlife, constructed wetlands should be designed to discourage use by wildlife.” (USEPA, 2005).</i> and, <i>“It is important that [agriculture] runoff not contain contaminants that could pose a threat to people or wildlife.” (USEPA, 2005).</i> These are statements issued by the USEPA, warning in no uncertain terms that wildlife should not be encouraged to use the type of polluted aquatic habitat that the 10-Year Plan is proposing to create. The 10-Year Plan intentionally encourages bird use, which is in direct conflict with USEPA’s warning that such habitat should be designed to discourage birds and wildlife, and to keep them out.</p>	<p>Comment noted. Please refer to responses to comment letter 52 submitted by the USEPA and comment response 41-1.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
41-3	7/6/2022	Email	Jeff Geraci	<p>2. Regulator Bias: A Federally Applied Two-Tiered Regulatory System is Unacceptable</p> <p>In 2018, USEPA Region 9 expressed opposition to the use of agricultural drainage for the creation of aquatic habitat at the Salton Sea as part of a proposed mitigation for a resource exploration project: <i>“We are concerned with the proposal to use drain water (irrigation water that carries salts, pesticides and potentially selenium from adjacent agriculture fields) to create mitigation habitat . . . EPA recommends the applicant consider alternative water sources to support mitigation habitat”</i> (USEPA, 2018)</p> <p>The project described above proposed the use of agricultural drainage for creating aquatic habitat; the same drainage that will be used to create aquatic habitat under the 10-Year Plan. The proposal was promptly rejected by USEPA.</p> <p>This inconsistency in the application of environmental regulation presents a major conflict that demonstrates a two-tiered system of selective environmental enforcement, whereby a restrictive regulatory approach is applied to the public, while a more lenient approach ensures that ‘special’ exemptions are afforded to the State. USEPA is bound to act consistently and equitably in applying its regulatory authority, and the US Army Corps of Engineers is equally obligated.</p>	<p>Please refer to responses to comment letter 52 submitted by the USEPA and comment response 41-1.</p> <p>The Corps and USEPA (CWA Section 404) regulatory framework distinguishes between aquatic habitat restoration projects and compensatory mitigation. Joint Corps-USEPA regulations govern compensatory mitigation for activities authorized by permits issued by the Department of the Army. For a compensatory mitigation project, including third-party mitigation to receive approval from the Corps, it must demonstrate compliance with Compensatory Mitigation for Losses of Aquatic Resources under CWA Section 404 (Final Rule) [33 CFR Parts 325 and 332; 40 CFR Part 230].</p>
41-4	7/6/2022	Email	Jeff Geraci	<p>3. So-called ‘Adaptive Management’ is Not a Sound Approach for a Massive Restoration Project. Hiding Behind the Façade of Adaptive Management Allows CNRA to Dodge Scrutiny and Conceal the Inherent Flaws of the 10-Year Plan by Speaking Only in Generalities and Offering Vague Descriptions of Conceptualized Actions, Actions that Proponents Aren’t Even Sure Will Succeed or Come to Fruition.</p> <p>The 10-Year Plan assessment states that ‘features’ of the project “would be adaptively managed to meet project goals.” The term “adaptive management” in this context translates to, “We’ll just figure things out as we go along.” It is inexcusable for a project of this magnitude, scope, and cost to center its primary strategy on an evolving speculation and wishful thinking. Adaptive management must not be used as a substitute for proper and thorough project planning and due diligence.</p> <p>The SSMP 10-Year Plan does not constitute an actual plan, because it lacks essential details. At best, it can be considered a ‘general’ 10-Year ‘concept’. Section 3.15.2 of the draft plan titled “Maintenance and Emergency Repairs” is only one of numerous examples contained in the assessment that illustrates this point. Within that section, several general intentions are expressed without any specificity or explanation, such as:</p> <ul style="list-style-type: none">• “Repairs”, including “adding riprap, filling cracks”, and “other minor” repairs, would be “conducted as necessary”.• Activities would include “maintaining” the sedimentation/mixing basins, interior and exterior berms, “habitat features”, “protective” riprap, pumping plants, “diversion(s)”, and public use facilities.• The water conveyance and supply system “would be inspected”, and maintenance “would be conducted as needed”.• Habitat “features” would be “regularly” inspected	<p>Adaptive management requires consideration of the risk, uncertainty, and the dynamic nature of ecosystem restoration projects. It is common practice to apply adaptive management strategies to reasonably foreseeable challenges for restoration projects, and compensatory mitigation projects reviewed and approved by the Corps and other federal and state resource agencies. An applicable definition of adaptive management is found in the Corps-USEPA regulations (33 CFR Parts 325 and 332; 40 CFR Part 230). The State will be required to develop an adaptive management plan and implement it, as discussed in Section 3.15.1 (Monitoring and Adaptive Management) of the Final EA. Implementation of the projects will follow the adaptive management approach in this plan to meet Goals 1 and 2 of the Final EA (Section 2.2, Project Goals and Objectives).</p> <p>Regarding maintenance and emergency repairs: the information presented is typical of environmental planning documents for large projects that have not yet been fully designed. It is reasonably foreseeable to plan for types of activities for maintenance and repairs; however, the location and occurrence of required repairs are unpredictable as specific projects are in the conceptual phase at this time.</p>
41-5	7/6/2022	Email	Jeff Geraci	<p>While these all sound great on the surface, there are no concrete details as to how these actions will be executed or what’s really involved. There are no contingency plans mentioned, no plan for dealing with irreconcilable legal issues, no proposed corrective actions, no definitive timelines, hardly any anticipated setbacks if at all, and there’s no long-term protections or long-term funding assurances addressed. Unsure buzz words like ‘could’, ‘might’, ‘should’, ‘probably’ and ‘may’ appear hundreds of times throughout the assessment, reinforcing the idea that the plan isn’t actually a plan, but rather a mishmash of general concepts guided by an optimistic anticipation; much like all the other restoration alternatives.</p>	<p>Review of State funding, legal issues, timelines, or other unanticipated setbacks are outside the scope of the EA. Refer to the State’s Salton Sea Management Program Annual Report prepared annually by CNRA for more information.</p> <p>The Corps’ use of conditional language is typical in pre-decisional documents such as draft environmental review documents that consider applicant-proposed activities requiring Corps permit authorization. Department of the Army permit authorizations incorporate definitive language to establish the terms and conditions of such authorization.</p>
41-6	7/6/2022	Email	Jeff Geraci	<p>The technologies being utilized for the project have already been proven according to the CNRA, and so there’s no reason to rely on adaptive management; a properly thought out and comprehensive project plan wouldn’t need to rely on adaptive management for success.</p>	<p>Refer to comment response 41-4.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
41-7	7/6/2022	Email	Jeff Geraci	4. The 10-Year Plan is Not the Least Environmentally Damaging Practical Alternative Due to its Physical Location and Other Environmental Factors. The Plan Will Introduce Numerous New Pathways that will Facilitate Bioaccumulation. As such, in Accordance With 40 CFR § 290.93, the Proposed Mitigation Must be Relocated, Sited Away from the Hazardous Salton Basin.	The comment is unclear on what new pathways for bioaccumulation or specifics constituents that would be introduced by the Project actions. Under baseline and no-project conditions, bioaccumulation can occur. The Project would expand and establish new areas of complex vegetation communities that would provide for a mechanism of vegetative uptake and removal of water quality constituents of concern from the Sea water column and sediments overtime. With long-term vegetation management, concentrations would be expected to decrease, which is a stated objective of the Project. Refer to Final EA Section 4.10.3.2 (Public Health, Existing Conditions), which details existing selenium and DDT concentrations, the primary constituents of concern. Selenium and DDT are addressed in Effect HAZ-8 (Selenium and DDE levels in ponds could cause increased selenium and DDE levels in sport fish and waterfowl using the ponds) and potential changes in concentration in constructed ponds would be identified and addressed through implementation of MM BIO-2 (Selenium monitoring). Refer also to comment response 22.
41-8	7/6/2022	Email	Jeff Geraci	Compensatory mitigation is meant to abate environmental impacts- not create them. Compensatory mitigation must compensate for loss of habitat by providing good-quality replacement habitat that ensures ecological success and sustainability; it is not intended to mitigate loss by providing degraded replacement habitat of minimal ecological value that poses a significant threat to wildlife. The 10-Year Plan does exactly that by creating a significantly hazardous situation for wildlife. Such a plan is contrary to 40 CFR § 290.93 and to wildlife conservation in general.	Consistent with Water Board Order 2017-0134 restoration milestones, the State is required to complete SSMP projects on the exposed lakebed from the Sea's recession. SSMP projects are not compensatory mitigation. However, the LOP procedures recognize that compensatory mitigation pursuant to the EPA/DA Mitigation Rule [330 CFR Parts 325 and 332 and 40 CFR Part 230] may be required to offset any unavoidable adverse impacts to aquatic resources authorized by the Corps' section 404 permits associated with implementation of the SSMP project(s). Refer to responses to comments 41-1 and 41-7.
41-9	7/6/2022	Email	Jeff Geraci	Consideration of surrounding land use (e.g., agricultural production and waste, unsuitable hydrology, harsh climate, legacy DDT/DDE and selenium in sediments, lack of water rights), being essential to the success of compensatory mitigation, continues to be neglected and whitewashed by the 10-Year Plan. Surrounding land use for the site of the 10 Year Plan includes more than half a million acres of agricultural land and more than 1500 miles of polluted agricultural drainage that will convey contaminants such as metals and pesticides into newly constructed ponds.	Potential effects to Selenium and DDT are addressed in Effect HAZ-8 (Selenium and DDE levels in ponds could cause increased selenium and DDE levels in sport fish and waterfowl using the ponds). Potential changes in concentrations in constructed ponds would be identified and addressed through implementation of MM BIO-2 (Selenium monitoring) and reduced through long-term vegetation management.
41-10	7/6/2022	Email	Jeff Geraci	Even with consideration given to functions and services as described under § 290.93 C (2) (ii), those functions and services fall short of controlling emissive dust, since the proposed acreage of aquatic habitat is vastly surpassed by the total acreage of exposed and potentially emissive playa. Successful conventional dust control has been achieved by the Imperial Irrigation District (IID), without the need for constructed aquatic habitat, thus proving that aquatic habitat is non-essential for dust control on exposed playa at the Salton Sea.	Comment noted. The Water Board Order requires that no less than 50% of the acreage described in Condition 24 shall provide habitat benefits for fish and wildlife that depend on the Salton Sea ecosystem. The remaining acreage is for dust control projects that involve surface roughening and surface stabilization.
41-11	7/6/2022	email	Jeff Geraci	Given the overwhelming evidence that the site location of the 10-Year Plan is incapable of providing safe and quality habitat for wildlife, compensatory mitigation in this case must be sited away from the project area as prescribed in § 290.93 (b) (6). Relocation of the project to a region that can provide an uncontaminated habitat fed by unpolluted inflows, such as along the Colorado River, is a far less damaging alternative that encourages wildlife to seek out safer habitat.	Relocation of the Project to another region is outside the scope of the SSMP 10-Year Plan, as this alternative would not meet the purpose and need or objectives of the Project which are to provide habitat for species at the Sea and to reduce dust emissions from the exposed lakebed at the Sea. Therefore, this offsite alternative is not considered in this EA.
41-12	7/6/2022	Email	Jeff Geraci	The State's notion that hazardous habitat at Salton Sea is more beneficial for wildlife than no habitat at all is disingenuous, and as I said previously, is predicated on baseless conjecture. Even the 10-Year Plan environmental assessment document concedes that fish and bird die-offs will still occur under the 10-Year Plan; in contrast, the same birds will not die off if the hazardous habitats are never developed. Wildlife, if faced with the loss of the sea, will migrate to alternative habitats that are safer and more beneficial than the Salton Sea. This has been observed and documented, as the Eared Grebe population that once occupied the Salton Sea has now moved on to other safer habitats, primarily Mono and Owens Lakes. The State is also dismissing other superior alternatives such as relocating the project to a safer and more productive location, or enhancing and expanding aquatic habitat in nearby regions, such as San Diego or along the Colorado River.	Refer to comment response 41-11.

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41-13	7/6/2022	Email	Jeff Geraci	Currently, there is no available data to suggest that existing Salton Sea wetlands in Imperial County have contributed to any measurable improvements whatsoever to the water quality in Salton Sea. However, SWRCB water quality monitoring data does show that the Imperial Valley wetlands are facilitating the bioaccumulation of contaminants in the food web, causing harmful pollutants to bio-magnify in the tissues of organisms. The 10-Year Plan will exacerbate this bioaccumulation, establishing new accumulation pathways and transferring pollution from one location to another, at the cost of contaminating an area that previously was not contaminated.	Refer to comment response 41-7. In addition, research has documented the effectiveness of wetlands in improving water quality in other parts of North America. Specific to the Salton Sea region, The New River Wetlands Project constructed two pilot wetlands in 2000 to improve water quality in the New and Alamo Rivers. Results of the project were described in the <i>Performance Evaluation of the New River Demonstration Wetlands</i> report (Tetra Tech 2006) that indicate improvements to water quality. Flowing water enters aquatic habitat areas and wetlands where it can settle into bottom sediments be subject to microbially-mediated reactions that may transform contaminants into volatile or bioavailable forms and can be incorporated into algae and plants. When taken up by fish and invertebrates, can move through the food chain. Eventually, these plants and animals die, settling into the sediment. Over the long term, with sediment build-up, there is sequestration of pollutants in the sediment. Both the Brawley and Imperial Wetlands substantially reduced the amount of nitrogen, phosphorous, pathogens (bacteria), and total suspended solids (sediment) in water https://ponce.sdsu.edu/brawley_imperial_wetlands_doc.html . Both wetlands removed over 90% of suspended sediments and pathogens (measured as fecal coliform). Some bioaccumulation of selenium in invertebrates, fish, and bird eggs was detected. Organochlorine pesticides were detected in tissue samples from fish and invertebrates. Results of the pilot make no conclusion that bioaccumulation was higher than future baseline conditions (Tetra Tech 2006). Following completion of the pilot study and the results showing improved water quality from the wetlands, a <i>New and Alamo River Wetland Master Plan</i> report (Tetra Tech 2007) was completed which identified 35 top-ranked wetland sites which, if implemented, would result in substantial reductions in loadings of phosphorus, nitrogen, total suspended solids, and total coliform load reductions.
41-14	7/6/2022	Email	Jeff Geraci	5. Removing Contaminated Sediment from Sedimentation Basins and Habitats, and then Using it to Construct Additional So-called Habitat and Berms, is Nothing Short of Environmental Malpractice.	<p>The assumption that all soils within the project area are contaminated is erroneous. Refer to Effects GEO-4 (Construction of project features would destabilize emissive soils, potentially generating additional fugitive dust) and HAZ-2 (Project construction could encounter contaminated soils during soil excavation). With the potential exception of pesticides, no significant areas of documented contamination were found in the study area, and no buildings, other structures, asphalt or concrete-paved surfaces areas would be demolished during Project construction. Soils would be tested for contaminants prior to excavation. Should testing show the presence of contaminated soil, or if such soil was observed either visually or through smell during construction activities, such material would be handled in accordance with DTSC found in Title 22, Division 4.5, Environmental Health Standards for the Management of Hazardous Wastes method and the Imperial CUPA Hazardous Waste Generator and Tiered Permitting Program and the Riverside County Department of Environmental Health Hazardous Materials Branch (i.e., the CUPA for the county). MM HAZ-3 (Provide Worker Training for Air-Borne Exposures and Disease) would be implemented to avoid and reduce potential exposure and effects to workers during construction, should soil contamination be encountered.</p> <p>Refer to comment response 41-1.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
41-15	7/6/2022	Email	Jeff Geraci	<p>Another fatal flaw of the 10-Year Plan is the fate of dredged sediments. The 10 Year Plan proposes that:</p> <p><i>“Material excavated from sedimentation basin(s) would be used to construct habitat features or added to the berms if the sediment is of appropriate quality.”</i></p> <p>Wetland sediments are known to sequester contaminants, and concentrations are typically much higher in those sediments than in the water column. In the case of existing constructed wetland systems near the Salton Sea, the highest concentrations of contaminants have been found in the sedimentation basins. Under the 10-Year Plan, sediments dredged from the constructed sediment basins and habitats will be laden with pesticides, selenium and other metals, qualifying as hazardous waste. It is inconceivable that the State of California would even consider reusing contaminated sediment dredged from constructed habitats to create even more hazardous habitat. Every ton of contaminated dredged sediment that is extracted has the potential to dry out and become emissive, particularly dredged sediments applied to berms and other routes of travel that are prone to disturbance by vehicle traffic and wind.</p> <p>The 10-Year Plan appears to propose regular monitoring of dredged sediments based on concerns of contamination:</p> <p>“Should testing show the presence of contaminated [dredged] soil, or if such soil was observed during construction activities, such material would be hauled off site and transported to an appropriate waste facility.”</p>	Refer to comment response 41-14.
41-16	7/6/2022	Email	Jeff Geraci	<p>In terms of “testing” contaminated soil, who will be responsible for conducting and overseeing such monitoring/ testing? How frequently will testing occur? Which contaminant thresholds will be used? Which approved analytical methods and reporting limits will be used for testing? How will the data be reported? Where will the data be stored for public accessibility? Is there guaranteed funding to pay the great expense of disposing of hazardous sediments?</p>	<p>The need for soil testing is identified in Effect HAZ-2 (Project construction could encounter contaminated soils during soil excavation), which addresses the potential for contaminated soils to be encountered during project construction. Testing would be conducted by project contractors and would be overseen by the SSMP. Testing methods used would be in accordance with applicable state and federal regulations. Project funding would include contingency for unanticipated testing and disposal. Testing results would be available upon request.</p>
41-17	7/6/2022	Email	Jeff Geraci	<p>Chanell Fletcher, CARB’s Deputy Executive Officer for Environmental Justice makes the claim on CARBs Website that <i>“Air pollution disproportionately impacts low-income communities and disadvantaged communities.”</i> Therefore, since numerous ‘disadvantaged’ communities are found in the vicinity of the proposed project where hazardous dredged material will be deposited on site by the State, what specific measures will CARB be taking to ensure that tens of thousands of tons of ultra-fine contaminated sediments won’t become desiccated and subsequently disturbed by traffic and wind, thus becoming airborne and impacting human health in said communities and beyond?</p>	<p>In the Final EA, refer to Section 4.6.3, Existing Conditions, Community Resources (formerly Section 4.5.3 in the Draft EA), new Subsection CalEnviroScreen 4.0, which presents Figure 4.6 illustrating census tracts and recorded pollutions levels in the Salton Sea Region. Refer to Final EA Section 2.2 (Project Goals and Objectives), which includes Project Goal 2: Develop a range of dust suppression projects to address air quality concerns at the Salton Sea. This goal is to address existing air quality issues at the Sea that affect human health in communities surrounding the Sea and includes objectives to reduce emissions of fugitive dust from soils and reduce total dust emissivity on the exposed lakebed. Implementation of the Project would address existing air quality dust emissions to all populations, including communities identified as disadvantaged.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
41-18	7/6/2022	Email	Jeff Geraci	6. The 10-Year Plan Displaces and Eliminates Native and Terrestrial Wildlife The 10-Year Plan is fatally flawed in that it proposes to flood thousands of acres of desert habitat with polluted wastewater, making the land uninhabitable for native, terrestrial flora and fauna that cannot exist in an aquatic environment. The 10-Year Plan comes at the expense of forcing out native terrestrial species such as the Flat Tailed Horned Lizard, which is not only reckless and irresponsible, but also contrary to both the public interest and wildlife conservation.	<p>Habitats within the transitional zone located between the desert and the lakebed that have already become established with vegetation may provide suitable desert habitat for terrestrial species, such as flat-tailed horned lizard, but these areas would likely have vegetation establishment applied as a dust suppression technique, rather than a water-related dust suppression project. The stormwater spreading technique would only be applied to vegetation establishment areas under conditions that would mimic natural stormwater spreading events, utilizing low-velocity stormwater and existing inflows. Inflows are known to contain water quality constituents of concern, as presented in Final EA Table 4-53 (Impaired Water Bodies within the Salton Sea Watershed). Refer to responses to comments 41-7 and 41-13 for additional information on how the Project would reduce pollutant concentration, as well as salinity levels, from the Sea's water column and sediments overtime, which would be a benefit to wildlife compared to existing conditions.</p> <p>The majority of water-related dust suppression projects would be implemented on recently exposed lakebed and areas that are currently underwater and are expected to become exposed in the future. These areas do not provide high quality desert habitat for sensitive terrestrial species, including flat-tailed horned lizard, which requires loose, sandy/gravelly soils with sparse vegetation. Other project activities could result in temporary disturbances to terrestrial wildlife habitats through ground disturbance and noise, but only a small amount of suitable habitat would be affected. Preconstruction surveys would be conducted before project activities conducted within suitable habitat to avoid/relocate special-status species, per MM BIO-6 (Prepare and Implement a Program-level Special-status Wildlife Species Management and Survey Plan). In addition, once activities are completed, these species could reestablish use of the disturbed area and no permanent loss of habitat would occur.</p>
41-19	7/6/2022	Email	Jeff Geraci	7. Introduction of Less Saline Water Has the Potential for Increased Toxic Algal Blooms <p>The 10-Year Plan utilizes a blend of (relatively low-saline) New and Alamo River water and hypersaline sea water which will inevitably lead to multiple unique biotic communities. In the case of cyanobacteria, there is a real risk that lower salinities could favor other cyanobacteria varieties that are more toxic than the current resident population. The cyanobacteria community in the Salton Sea has changed significantly over the past ten years simultaneously with changing salinity.</p> <p>Elevated cyanobacteria toxin concentrations of <i>microcystin</i> and <i>anatoxin-a</i> have been observed at the Salton Sea and associated constructed wetlands, prompting frequent or permanent public health warnings. At least one dog fatality occurred at the Salton Sea last year, confirmed to be the result of cyanotoxin exposure. Note too that fresher water may also cause re-dissolution of contaminants from sediments and interstitial fluid, including DDT and selenium.</p>	<p>Harmful algal bloom (HAB) development is not only predicated on the presence of water but a complex scenario of excess nitrogen and phosphorus concentrations that can cause an overgrowth of algae in a short period of time. Blooms in brackish water are most commonly caused by dinoflagellates or diatoms but can also be caused by cyanobacteria. Please refer to State Water Resources Control Board. Center for Disease Control and USEPA HAB Program websites for additional information.</p> <p>There was a study completed on water quality samples (Carmichael, W.W., Li, R. Cyanobacteria toxins in the Salton Sea. <i>Aquat. Biosyst.</i> 2, 5 (2006). (https://doi.org/10.1186/1746-1448-2-5) that found presence of Cyanobacteria at the Salton Sea. The Salton Sea is a dynamic system that has changed over the past 10 years and will continue to change throughout the SSMP 10-Year planning and implementation period due to reasons outside the scope of the EA. The SSMP 10-Year Projects will be adaptively managed to provide at least 14,500 acres of fish and wildlife habitat. Aquatic projects that include ponds that provide habitat for piscivorous birds will be adaptively managed for water quality and a sustainable fish population as the Sea recedes and increases in salinity. In addition, the aquatic habitat projects are being designed and managed through adaptive management plans for water to move through the system with a specific residence time, to reduce the development of the warm, stagnant conditions that favor cyanobacteria.</p> <p>https://mywaterquality.ca.gov/habs/</p> <p>https://www.cdc.gov/habs/environment.html#:~:text=They%20are%20most%20commonly%20caused,also%20be%20caused%20by%20cyanobacteria.&text=Blooms%20can%20occur%20in%20brackish,also%20be%20caused%20by%20cyanobacteria</p> <p>Also refer to comment response 55-62.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
42	7/7/2022	Email	Yolanda Cisneros	<i>Ya se seco mucho del lado del 111 aquí en north shore y yo tengo 20 años viendo aquí y de verdad vivo enferma últimamente más mal por el polvo de la laguna y el olor muchísima alergia</i> It is already very dry on the 111 side here in north shore and I have 20 years living here and I really live sick lately more bad because of the dust from the lagoon and the smell a lot of allergies.	Comment noted. Dust suppression and minimizing public health issues is one of the objectives of the SSMP 10-Year Plan. Also, refer to comment response 41-17.
43	7/7/2022	Email	Yolanda Cisneros	<i>Necesita lo mismo para north shore ca H-14 ódigo postal 92254 ya que nos afecta de la misma manera</i> Need the same for north shore postal zip code 92254 as we are affected in the same way.	The purpose of the SSMP 10-Year Plan includes the implementation of dust suppression projects around the Salton Sea, including the North Shore, as described in Section 2.1 (Purpose and Need) of the EA and Section 3 (Proposed Project and Alternatives). Also refer to comment response 41-17.
44	7/7/2022	Email	Lyudmila Garcia, GreenTerra Realty	The Mega Cycle of Water Book has a chapter for solving the problem plus enhancing local industries at Salton Sea Lake USA and Local Californians. CA Salton Sea Lake is Lithium Salar Desert overlay ground; indeed, the lake's water is 50% saltier than sea with other minerals that are harmful for public health. All Fresh Water will become saltier with many toxic minerals that cannot support life like fish and people cannot drink water or swim in the man made lake. For example "in Chile and Argentina lithium comes from salt deserts, so-called SALARS." (https://www.volkswagenag.com/en/news/stories/2020/03/lithium-mining-what-you-should-know-about-thecontentious-issue.html#) In addition, "A new USGS study reports that about 45% of public-supply wells and about 37% of U.S. domestic supply wells have concentrations of lithium that could present a potential human-health risk." (https://www.usgs.gov/news/lithium-us-groundwater). Get Free Look of Table of Contents at https://www.greenterra.org/	Comment noted. Water quality and supply within the U.S. and lithium supply are outside the scope of the Corps federal action of whether to issue Department of the Army permits for discharges of dredged or fill material associated with the implementation of aquatic resource restoration or dust suppression projects proposed under the SSMP 10-Year Plan. The effects of the federal actions on water quality and supply are considered in Sections 3.17, 4.16, and 5.16, and minerals are considered in Sections 4.9, 5.9, and 6.17 of the Final EA. The commenter is assumed to be comparing the Salton Sea to either Salar de Uyuni in Bolivia or Salar de Atacama in Chile, which are high elevation salt lakes with lithium being mined from lithium-rich brine beneath the salt crust. The geothermal lithium sources under the Salton Sea are being explored and by definition geothermal sources originate at significant depths below ground surface. Lithium extraction would then utilize the stream from these hot water reservoirs to power turbines that would generate electricity. Lithium extraction would occur from underground pockets of brine found at depths of as much as 8,000 feet below ground surface. The Project would not introduce new sources of lithium to the environment or drinking water sources and Project construction that requires surface grading would not be at depths sufficient to interact or release lithium brine sources that are deposited at significant depths. The commenter is correct that the No Action Alternative would result in higher salinity concentration and potentially higher concentrations of water quality constituents of concern in the Salton Sea.
45	7/8/2022	Email	Ian Poulson	The State of California's Salton Sea Management Program Phase 1: 10-Year Plan (SSMP 10-Year Plan) document contains a number of satellite images of the Salton Sea, some of which include the grey line running north to south, arrowed. It doesn't appear to be keyed anywhere - could you tell me what it represents please?	Sometimes when multiple aerial photographs are stitched together, they have imperfections where they overlap. This appears to be one of those cases. The line you noted is an artifact of the mapping and doesn't have any meaning.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
46-1	7/12/2022	Email	Nikola Lakic	<p>1. Thank you for the opportunity to say a few words again.</p> <p>2. I am preparing a written comment, but I will use this opportunity to insert a few paragraphs from my written comment.</p> <p>3. On the flyer for the (3) meetings, it says: “Learn More + Participate in the Environmental Review Process”.</p> <p>4. It also says: “SSMP 10-Yeat Plan and Environmental Assessment.”</p> <p>5. In previous meetings, I was able to say a few words and I am thankful for those opportunities.</p> <p>6. I did mention the disconnect between two projects a) Extraction of Lithium and b) Restoration of the Salton Sea.</p> <p>7. Without going into accusations and details of who is accountable for the current grave situation, it is important to say that radical changes need to be done if we want to save and restore the Salton Sea, protect our environment and the health of the local population, and to accomplish the state's primary goal of almost 100% renewable energy.</p> <p>8. There is a fundamental disconnect between the “current course of action” and what should be done and how.</p> <p>Current setup:</p> <p>Several agencies including the SSA, IID, Tetra-Tech, CNRA, and a few additional supporters, after 20 years of designing and redesigning are openly claiming contribution and credit for their masterpiece design - the “Perimeter/Brine Lake”.</p> <p>9. NOTE: The “Perimeter/Brine Lake” is a single snake-like “U”-shape Lake consisting of a South part, the Western part, the North part, and the Eastern part. It has a perimeter wall with the function of funneling the New River and Alamo River around the periphery of the Lake into the Central part which is the Brine Lake. Before reaching permanent size, Brine Lake will be smaller, saltier, smellier, and more polluted every year leading to ecological disasters with tremendous consequences and liabilities. I am sorry to say that such a design is a non-sensical concept.</p> <p>10. Monitoring increased salinity and pollution does not make sense. First, we need a plan on how to decrease salinity and pollution. That is what I am providing.</p>	<p>The SSMP 10-Year Plan focuses on creating 29,800 acres of habitat and dust suppressions projects in accordance with SWRCB 2017-0134. The EA provides an analysis of various alternatives in consideration of the project purpose and need pursuant to NEPA and the CWA Section 404(b)(1) Guidelines. Proposals associated with water importation, perimeter lake, lithium extraction, and desalination are outside of the scope of the SSMP 10-Year Plan. Refer to Final EA Sections 4.9, 5.9, and 6.10 for an evaluation the effects of the federal actions on minerals and Sections 3.17.4.16, and 5.16 on water supply. Also refer to response to comment 6 for water importation.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
46-2	7/12/2022	Email	Nikola Lakic (cont.)	<p>11. The concept of the “Perimeter/Brine Lake” was “somehow” officially accepted by several agencies in 2016. Also, it is important to mention that such a decision was made without considering my design and without public and relevant agencies knowing about the existence of my proposal.</p> <p>It was well known and documented that the “Perimeter/Brine Lake” will shrink substantially and will have exposed lakebed (playa) – about 200 square miles.</p> <p>According to their (SSMP) and a 10-year plan, the same proponents proceeded with supporting projects to mitigate the formation of toxic dust storms by planting plants and ruffling the surface bringing obstacles such as haystacks on the playa as we have seen during these presentations.</p> <p>The plan is to mitigate about 9 square miles but has difficulties finding water from depleting groundwater (wells) and occasional stormwater.</p> <p>They are hoping that if they get money from the government to continue designing for another 20 years that they will somehow figure out how to find water to mitigate toxic dust storms for the remaining 100 + square miles of the playa.</p> <p>I can tell you with certainty that Santa Claus is busy making toys and will not help with needed water. Based on some recent development, it appears that those who promote the “destruction” of the Salton Sea intend to continue designing as it goes – possible for another 20 years. I am sorry if this sounds sarcastic – it is not my intention to mock anyone – but, it is absolutely true and well documented.</p> <p>I would like to mention that the concept for the restoration of the Salton Sea already existed since 2013 and the preliminary plan since 2016 and 2018.</p> <p>We cannot lose time anymore. It is time for finding a reputable contractor(s) for its implementation.</p> <p>I respectfully urge the U.S. Army Corps of Engineers (Corps) and EPA not to sub come under the big pressure of those who want to get rid of the Salton Sea under the disguise of restoring the Salton Sea.</p>	Comment noted. Refer to comment response 24-3.
47	7/14/2022	Email	Hugo Hoffman	Do you have an email notification or website update that we can send around internally and to other interested parties to help spread the word?	The CNRA website at https://saltonsea.ca.gov/ can be used to access information on the SSMP and recent updates. To receive SSMP email updates for the latest on project delivery, upcoming meetings, opportunities to provide input and more, interested parties can sign up at: https://public.govdelivery.com/accounts/CNRA/signup/29107 .
48	7/19/2022	Email	Dan Hartshorn	Attached is a YouTube video that is my idea to help improve the conditions at the Salton Sea and the surrounding area. I hope you find it at least interesting.	As indicated in Corice Farrar's 7/25/2022 email to this commenter, the Corps is unable to consider a video, or any views expressed in a video as constituting submittal of a comment for the purposes of the Corps public notice period. The commenter was encouraged to submit written comments for consideration by the Corps' during the preparation of a final EA.
49	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	Here is a free attached copy for saving millions of dollars and freshwater.	Refer to comment responses 3, 6, 35, 41-1, and 46-1.
49-1	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	As reported by Volcano Discovery, “[Salton Buttes volcanic field consist of 5 small rhyolitic lava domes built above sediments of the Colorado River delta within the Salton Sea geothermal field, located at the SE margin of the Salton Sea, California... On 20th century formation of the Salton Sea due to an accidental spill-over of the Colorado River, are found on all the domes. Older, sediment-buried Pleistocene rhyolite lava domes have been found in geothermal drill [wells]-holes. The Salton Sea geothermal field produces saline geothermal brines.” (https://www.volcanodiscovery.com/salton_buttes.html)	Background information regarding the geology and paleontological resources of the Salton Sea are provided in Sections 4.9 (Geology, Soils, Seismic and Minerals, Affected Environment) and 4.14 (Paleontological Resources, Affected Environment) of the EA, respectively.
49-2	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	This shows that there was no natural lake, it was manmade with high deposits of salts called rare minerals that cannot be purified through desalination process. In fact, California Salton Sea Late is dead because has a very high concentration of salt and earth rare minerals.	Sources of salinity in the Salton Sea are discussed in Section 1.2 of the EA. Refer to comment responses 39, 46.1.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
49-3	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	"The earth deep below the southern Salton Sea is rich in hot, mineral-abundant brine that contains some of the world's largest deposits of lithium, and Colwell and others envision a "Lithium Valley" that would establish California as a global production hub and employ thousands of workers for generations to come... California is already pursuing a \$206m lake restoration plan to try to reverse the Salton Sea's fortunes." (https://www.theguardian.com/us-news/2021/sep/27/salton-sea-california-lithiummining#).	The presence of lithium within the region of the Salton Sea is discussed in Section 4.9 (Geology, Soils, Seismic and Minerals, Affected Environment). Refer to comment response 39. The link provided in the comment is broken.
49-4	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	Imperial County started to drill to the volcano to harness its energy.	Comment noted.
49-5	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	With more salt/ rare minerals pump and put in to the surface of the lake, pollution has been increase drastically over the years. Lake's contaminated water evaporates and goes to air region and causing health risk and unsafe living conditions to the local communities and geothermal employees.	Comment noted. Refer to comment response 41-17.
49-6	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	"Salty water that has been overlooked and pumped back underground since the region's first geothermal plant opened in 1982. The mineral-rich byproduct may now be more valuable than the steam used to generate electricity." (https://www.courthousenews.com/lithium-fuels-hopes-forrevival-on-californias-largest-lake/#).	Comment noted. Lithium extraction is not a proposed activity under the SSMP 10-Year Plan and not a covered activity under the LOP Procedures. The effects of the federal actions on critical minerals are considered in Sections 4.9, 5.9, and 6.10. Also, refer to comment response 38.
49-7	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	"The [Salton] Sea is about 35 miles long and about 15 miles wide. It is the largest inland lake in the state of California. How much salt goes into the Salton Sea every year? Around 4,000,000 tons of dissolved salts enter the Salton Sea every year. That is the equivalent of approximately 13,500 train cars. The salt comes from agricultural drainage and tail water and the Colorado River itself. The Salton Sea is approximately 60 parts per thousand (PPT). By comparison ocean water is approximately 35 PPT. The salinity of the sea increases every year. As the sea evaporates every year all the salt delivered to it is left behind thereby increasing the salinity with each passing year." (https://saltonsea.com/about/faq/) Moreover, "the sea is also highly saline—more than 50 percent saltier than the Pacific Ocean. This is partially due to the high salinity of the agricultural runoff water that is the sea's primary source of replenishment." (https://lao.ca.gov/Publications/Report/3879)	Comment noted. Factors contributing to rising salinity in the Salton Sea are discussed in Section 1.2 (Salton Sea Background) of the EA.
49-8	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	The sea has slowly been shrinking due to the high saline soil.	The Sea is shrinking due to factors discussed in Section 1.2 (Salton Sea Background) of the EA.
49-9	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	"The shrinking Salton Sea was once a tourist destination. Now it's home to dangerous algal blooms, endless dust, and noxious air...if nothing is done to address the pollution crisis, the area will become almost unlivable.	Comment noted. Refer to comment responses 41-17, 41-19.
49-10	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	An unprecedented drought amplified by the climate crisis and growing demand for water in Southern California are both hastening the Salton Sea's decline. Researchers predict that the sea could lose nearly three-quarters of its volume by 2030. By some estimates, the declining water level could expose an additional 100,000 acres of playa [/ beach]." (https://www.theguardian.com/us-news/2021/jul/23/salton-seacalifornia-lake-dust-drought-climate)	Comment noted. Refer to Section 2 (Project Purpose, Need and Objectives) of the EA.
49-11	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	The Region of Salton Sea Lake is classified and so-called "SALARS;" for example "in Chile and Argentina lithium comes from salt desert." (https://www.volkswagenag.com/en/news/stories/2020/03/lithium-mining-what-youshould-know-about-the-contentious-issue.html#)	Salars are salt deserts found in Chile and Argentina. The extraction of raw materials from salars functions as follows: lithium-containing saltwater from underground lakes is brought to the surface and evaporates in large basins. Lithium sources of the Salton Sea are found beneath the Salton Sea are within geothermal brine pockets located at depths up to 8,000 feet below ground surface and would not be extracted from the salt crust or Sea body. Refer to comment response 44.
49-12	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	In addition, "A new USGS study reports that about 45% of public-supply wells and about 37% of U.S. domestic supply wells have concentrations of lithium that could present a potential human-health risk." (https://www.usgs.gov/news/lithium-us-groundwater)	The quality of drinking water in the U.S. is outside the scope of the SSMP and outside the scope of the EA. Refer to comment response 39.
49-13	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	With all the above describe, California Salton Sea Lake is Lithium, Salt Desert with overlay ground which makes lake's water is 50% saltier than sea with other minerals that are harmful for public health. Keeping manmade lake will continue the evaporation of water with rare minerals causing air pollution and causing many health hazards in the community. In fact, over the years, all freshwater from rains becomes saltier than the sea, and testimonials and case studies shows cannot support life like fish and people cannot drink water or swim in the lake.	Comment noted. Refer to comment responses 39, 41-17.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
49-14	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	Though Salton Sea Lake is more than “Lithium Salt Desert” because total of 11 geothermal plants used a great amount of water. “Geothermal power production utilizes water in two major ways: The first method, which is inevitable in geothermal production, uses hot water from an underground reservoir to power the facility.” (https://openei.org/wiki/Geothermal/Water_Use#) The estimated production of a terrific source of energy sustainability to California is “403 MW is generated by the existing power plants, ten of which are owned by CalEnergy and one by EnergySource.” https://en.wikipedia.org/wiki/Imperial_Valley_Geothermal_Project)	Refer to comment response 38.
49-15	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	My California Salton Sea Lake Ten Year Plan We need to continue building up Geothermal and Lithium Industries and at the same time solving the contamination in the air. Understanding, California Salton Sea born dead in nature is the first step. It was made for an accident and all excess of Colorado River was put on the region for his holding capacity.	Refer to comment responses 38, 39, 41-17.
49-16	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	1. Remove all the water in phases and start planting desert plants that are the same as nearby desert areas at Imperial Valley for reducing dust pollution in the area while simultaneously creating business platforms and jobs for collecting all rare salt minerals and repeating the step until there is no more water. Desert plants will bring oxygen and water according to the natural habitat. Repeat this process of removing water and planting desert plants, as needed. 2. Repeat Process as needed: Putting layers of gravel with glue over the years for burying all rare salt minerals at lake's area. It will be a moment that you can stop because air pollution will stop with lots of clean fresh air.	The SSMP 10-year plan includes dust suppression activities, which include habitat restoration. Removing water from the Salton Sea is outside the scope of SSMP 10-Year Plan and therefore outside the scope of this EA.
49-17	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	3. At the same time, order Hydrology and Survey-Soil Studies (Environmental Site Assessments - Phase 1 & 2) for Finding and Remediate Contamination, Soil And Water Investigations, and best hooking and manipulating reliable water sources.	Refer to comment responses 35, 41-1. Finding and remediating soil contamination is outside the scope of the SSMP 10-Year Plan. The EA does address the potential for project construction to encounter contaminated soils during soil excavation (Effect HAZ-2).
49-18	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	4. Building a network of wells based on the above studies to enhance all geothermal and lithium industries. 5. Installing Water Purified Plants for each Geothermal Plant for getting neutral water and avoid spilling freshwater and not to be allocated to industries.	Refer to comment response 39.
49-19	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	Conclusions: 1. I concluded that underground freshwater will only enough for enhancing geothermal and lithium industries. Water Transfer to local and mega regions will only jeopardize industries and communities.	Refer to comment response 6.
49-20	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	2. Keeping California Salton Sea Lake full of water will continue the pollution in environment with rare salt mineral that health risk to the communities and geothermal and lithium employees.	Comment noted. Refer to comment response 41-17.
49-21	7/20/2022	Email	Lyudmila Garcia, GreenTerra Realty	3. Desalination Water Plant will generate more pollution into the water because discharged will be a greater concentration of salt rather than sea water with huge power consumption because overlay ground is a Lithium Salt Desert. Again, California Salton Sea water has 50% more salt than the sea's water. 4. Bringing the sea's water for fulling lake will continue pollution and most likely will not pass California Environmental Studies and current standards. Getting the sea's water from the Cortez Sea Water is going to continue water and air pollution into region.	Importation of water and desalinization are outside the scope of the SSMP 10-Year Plan. Refer to comment responses 6, 46.1.
50	7/25/2022	Email	Lyudmila Garcia, GreenTerra Realty	I would like to give an advance of August 2022 Press Release How to Save California Salton Sea Lake & INVEST in Geothermal and Lithium Businesses	Comment noted. Refer to comment response 49.
50-1	7/25/2022	Email	Lyudmila Garcia, GreenTerra Realty	Unlikely, the Salton Sea Management Program is passing a project for keeping pollution and expanding the budget for bringing water from the Sea of Cortez. (https://www.thedesertreview.com/news/local/salton-sea-panel-reveals-3-submissions-passed-fatal-flaw-analysis/article_505a84e4-08d1-11ed-8d2f-73dcfb38ec79.html)	Refer to comment response 6.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
50-2	7/25/2022	Email	Lyudmila Garcia, GreenTerra Realty	The Region of Salton Sea Lake is classified and so-called "SALARS;" for example "in Chile and Argentina lithium comes from salt desert." (https://www.volkswagenag.com/en/news/stories/2020/03/lithium-mining-what-you-should-know-about-the-contentious-issue.html#)	Refer to comment response 49-11 (identical comment).
50-3	7/25/2022	Email	Lyudmila Garcia, GreenTerra Realty	In addition, "A new USGS study reports that about 45% of public-supply wells and about 37% of U.S. domestic supply wells have concentrations of lithium that could present a potential human-health risk." (https://www.usgs.gov/news/lithium-usgroundwater)	Refer to comment response 49-12 (identical comment).
50-4	7/25/2022	Email	Lyudmila Garcia, GreenTerra Realty	Over the years, scientists have reported that Water Evaporation is bringing into the region high concentrations of rare-salt minerals that are health hazards and making lake's water poison for drinking, swimming, or animal life. In fact, Bringing the sea's water for fulling lake will continue pollution and most likely will not pass California Environmental Studies and current standards. Getting the sea's water from the Cortez Sea Water is going to continue water and air pollution into the region.	Water evaporation does not bring rare-salt minerals into the region. Whatever minerals are in the water at the Sea as it evaporates are the minerals left behind.
50-5	7/25/2022	Email	Lyudmila Garcia, GreenTerra Realty	Strongest Gift and Solutions was made from Imperial Gold plans to use the natural sand and gravel from the Imperial Gold Project as a remediation material to solve the Salton Sea contamination. In addition to gold, the Imperial Gold Project will produce 54 million cubic yards or 94 million tons of clean sand and gravel placed in the Imperial Valley by the Colorado River over the past 10 million years. (https://www.imperialgold.org/environmental-stewardship/project-aces)	The State proposes to procure material to cover land as a dust suppression technique based on availability, suitability and feasibility, when needed on a project basis.
50-6	7/25/2022	Email	Lyudmila Garcia, GreenTerra Realty	My gift to Imperial Valley is to research a solution for Salton Sea Lake and Enhancing Geothermal and Lithium Business. See attach file. When politicians are going to do the right things and avoid more destruction and contamination?	Comment noted. Please refer to comment response 49.
51	7/26/2022	Email	Jonathan Shore, USFWS	The U.S. Fish and Wildlife Service in its capacity as a Cooperating Agency in the environmental assessment (EA) process for the Salton Sea Management Program Phase 1: 10-Year Plan, pursuant to Section 1501.8 of the National Environmental Policy Act, acknowledges through this email that we have reviewed the information and analysis in the draft EA and concur with the conclusions as they related to lands owned and/or managed within the Sonny Bono Salton Sea National Wildlife Refuge (Refuge). Any future actions associated with the Salton Sea Management Program Phase 1: 10-Year Plan that would occur on Refuge lands will require the processing and approval of a Refuge Special Use Permit. We appreciate the opportunity to participate as a Cooperating Agency in the preparation of the EA for this project.	Comment noted.
52-1	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Under the Salton Sea Management Program Phase 1: 10-Year Plan ("the project"), the State program sponsors propose to implement a minimum of 29,800 acres of habitat restoration and dust suppression projects on lakebed areas that have been, or will be, exposed by 2028. At least 14,900 acres of individual projects are planned to be aquatic habitat restoration projects.	Comment noted.
52-2	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	The EPA is supportive of the project's goals to restore aquatic habitat and suppress dust in the project area; however, according to the Draft EA, construction of the project would result in short-term disproportionately high and adverse air quality impacts to low-income and minority communities in Riverside and Imperial counties that have existing environmental and health burdens.	Comment noted.
52-3	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Given that the project has the potential to both address and contribute to environmental burdens in communities with existing vulnerabilities, we recommend that the Corps and partner agencies ensure robust community engagement to advance fair treatment and meaningful involvement for communities that would be affected by the project. We strongly encourage the Corps to incorporate additional mitigations and offsets and continue public involvement to further reduce these burdens while pursuing the long-term benefits from the project. In the enclosed detailed comments, we have specific recommendations to address this issue and others.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
52-4	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Environmental Justice--Disproportionately High and Adverse Impacts The Draft EA acknowledges that there would be short-term disproportionately high and adverse air quality impacts to low-income and minority populations from construction-related emissions, but states that these are balanced by the long-term benefits from permanent dust control after construction (p. 5-18). In addition to the proposed mitigation measures MM-AQ1 and MM-AQ2 from the Draft EA, the EPA recommends incorporating the measures outlined below to further address the short-term construction-related emissions. We also recommend that the Corps investigate ways to offset the remaining residual disproportionate short-term impacts through outreach and collaboration with the affected communities.	<p>In addition to the recommended measures to address short- term emissions, measures such as utilizing alternative fueled vehicles when feasible, using the Best Available Technologies during construction and operation of projects, using the minimum feasible amount of greenhouse-gas emitting construction materials where possible, and more were added to mitigation measures MM AQ-1 (Diesel Control Measures to Reduce PM10 and NOx Emissions from Diesel Engines). MM AQ-2 (Implement standard dust suppression activities during ground disturbance and at the end of each workday) was also updated to include more measures intended to reduce short term emissions, including but not limited to: watering or otherwise stabilizing exposed areas before high winds, deploying sand fences around construction sites where feasible, and erecting three-sided enclosures around storage piles. In addition, a new mitigation measure has been added to address potential truck trip impacts to disadvantaged communities. MM EJ-1 is to develop and implement a truck mitigation plan to limit impacts to sensitive receptors for projects with construction occurring near disadvantaged communities.</p> <p>The State continues to conduct community outreach with the local communities as described in Section 8.7, Public Outreach/Involvement in the Final EA.</p>
52-5	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Recommendations: In the Final EA and Finding of No Significant Impact for the project, we suggest supplementing the proposed mitigation measures required under “MM AQ-1” (p. 5-20) for construction mobile emissions with the following practices. <i>Best Available Technologies (BAT)</i> - Require BAT during construction and operation of projects, employing the cleanest alternatives available, including but not limited to: a) Soliciting bids that include use of energy and fuel-efficient fleets; b) Soliciting preference construction bids that use BAT, particularly those seeking to deploy zero-emission technologies (see below for more specific guidance on equipment deployment); c) Employing the use of alternative fueled vehicles; d) Using lighting systems that are energy efficient, such as LED technology; e) Using the minimum feasible amount of greenhouse gas (GHG)-emitting construction materials that is feasible; f) Using cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; g) Using lighter-colored pavement where feasible; h) Recycling construction debris to maximum extent feasible; and i) Planting shade trees in or near construction projects where feasible.	Recommended mitigation measures have been added to MM AQ-1.
52-6	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<i>Electric Power during Construction</i> – Use grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators, where feasible.	Comment noted. Projects would be designed to minimize power use and limit the use of diesel generators.
52-7	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<i>Definition of “clean truck”</i> – Define the term “clean truck” in relation to current vehicle emissions standards. One option for defining this technology would be to compare it to the US EPA exhaust emission standards for model year 2010 and newer heavy-duty on-highway engines, or the California Air Resources Board optional low NOX emission standards for on- road heavy-duty engines. See: <ul style="list-style-type: none">• <i>Heavy-Duty Highway Compression-Ignition Engines and Urban Buses: Exhaust Emission Standards</i>;¹• <i>Optional Reduced NOX Standards for Heavy-duty Vehicles</i>;²• <i>Optional Low NOX Certified Heavy-Duty Engines</i>;³• <i>How to Identify Low NOX Certified Engines Diesel Emissions Reduction Act (DERA) Grants Fact Sheet</i>.⁴	Mitigation Measure MM AQ-1 (Implement Diesel Control Measures to Reduce PM10 and NOx Emissions from Diesel Engines) has been modified in the Final EA to include an acknowledgement that the US EPA exhaust emission standards for the model year 2010 and newer duty on-highway compression-ignition engines should be met or exceeded by all on-highway vehicles. In regards to nonroad vehicles and equipment, the measure now states that they should meet or exceed the USEPA Tier 4 exhaust emissions standards for heavy-duty nonroad compression ignition engines.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
52-8	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<i>On-Highway Vehicles</i> - On-highway vehicles servicing infrastructure sites should meet, or exceed, the US EPA exhaust emissions standards for model year 2010 and newer heavy-duty on-highway compression-ignition engines (e.g., drayage trucks, long haul trucks, refuse haulers, shuttle buses, etc.).	MM AQ-1 (Implement Diesel Control Measures to Reduce PM10 and NOx Emissions from Diesel Engines) has been modified in the Final EA to include recommended measures.
52-9	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<i>Nonroad Vehicles & Equipment</i> - Nonroad vehicles & equipment servicing infrastructure sites should meet or exceed the US EPA Tier 4 exhaust emissions standards for heavy-duty nonroad compression-ignition engines (e.g., nonroad trucks, construction equipment, cargo handlers, etc.).	MM AQ-1 (Implement Diesel Control Measures to Reduce PM10 and NOx Emissions from Diesel Engines) has been modified in the Final EA to include recommended measures.
52-10	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<i>Low Emission Equipment Exemptions</i> – The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.	Comment noted.
52-11	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	EPA suggests supplementing the proposed mitigation measures listed in “MM AQ-2” (p. 5- 21) for construction fugitive dust with the following measures from the <i>WRAP Fugitive Dust Handbook</i> . ⁵ <ul style="list-style-type: none"> • Deploy sand fences, • Use washed rock 100 feet prior to exit onto pavement, • Water, or otherwise stabilize, exposed areas before high winds, using weather forecasts • Erect 3-sided enclosures around storage piles, • Develop a construction fugitive dust monitoring and mitigation plan, with recordkeeping compliance tools from the WRAP Handbook. 	MM AQ-2 (Implement standard dust suppression activities during ground disturbance and at the end of each workday) has been modified in the final EA to include recommended measures.
52-12	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Develop additional mitigation and offsets in coordination with affected low-income and minority communities. <ol style="list-style-type: none"> 1. To further mitigate environmental justice impacts, continue coordination with affected communities to identify mitigation measures for the short-term disproportionately high and adverse impacts associated with construction of the project. Commit to a process for providing affected communities with detailed information about the array of dust abatement measures being considered, including a description of which measures would be appropriate and feasible in specific locations within the project area, and ensure that selected measures are responsive to community interests and needs whenever feasible. 2. Ensure that affected communities are provided opportunities to participate in the recommended monitoring and mitigation plan for construction air quality impacts, and that evaluation of mitigation effectiveness and improvements to the plan are responsive to community feedback. 3. Consider measures to offset residual disproportionate impacts based on coordination with affected communities and include them in these measures in the Final EA. For example, additional notification about construction schedules and planting offsite trees nearer to affected communities could help to mitigate for increased short-term burdens. Consider also undertaking targeted local outreach for construction hiring. 4. Prioritize and expedite dust abatement measures in the construction schedule to address existing concerns of communities currently experiencing high environmental and health disparities. 5. Develop a truck management plan that avoids designating truck routes near sensitive receptors to the fullest extent feasible. 	Section 8.7 of the Final EA provides an overview of the public outreach and public involvement conducted as part of developing the SSMP and preparing the EA. This section has been updated to provide more detail regarding this coordination, and to state that additional opportunities for outreach for other related programs (e.g., Long-Range Plan) are ongoing. A new mitigation measure has been added to Section 5.6.2, Environmental Justice, Effects Analysis: MM EJ-1: Develop and implement a truck management plan to limit impacts to sensitive receptors for projects with construction occurring near disadvantaged communities.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
52-13	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<p>Identification of Low-Income and Minority Populations and Environmental Burdens</p> <p>The Draft EA does not clearly communicate where environmental justice-related impacts are expected to occur. The document states that CalEnviroScreen was used to identify potentially affected communities (p. 4-44), but EPA suggests that applying additional tools that use a census tract- or census block-level analysis could improve the analysis and disclosure in the EA. These could help communicate where impacts would occur and analyze the cumulative impact with existing environmental burdens, including those beyond Clean Air Act non-attainment areas.</p>	<p>Section 4.6.3 (Existing Conditions, Community Resources) has been revised to include an update to the CalEnviroScreen discussion that includes census tract data. In addition, tools that utilize a census block-level analysis (EJScreen and the Healthy Places Index,) were added to provide more insight into the existing burdens faced by different communities in the region. Note that the section numbers for Community Resources (including Environmental Justice) have changed from the Draft EA.</p> <p>The impacts resulting from implementation of the project would be primarily positive and would be experienced on a regional scale as well as directly by communities on the shore of the Sea. EJ-2 (construction emissions) is the only short term impact that would have a disproportionate effect on minority and low-income populations. MM AQ-1 (Implement Diesel Control Measures to Reduce PM10 and NOx Emissions from Diesel Engines) and MM AQ-2 (Implement standard dust suppression activities during ground disturbance and at the end of each workday) have been updated to further mitigate impacts. In addition, a new mitigation measure has been added to Section 5.6.2, Environmental Justice, Effects Analysis as MM EJ-1 (Develop and implement a truck management plan to limit impacts to sensitive receptors for projects with construction occurring near disadvantaged communities).</p> <p>Under the No Action Alternative, dust emissions impacts would be worse than with any of the action alternatives, which would disproportionately affect disadvantaged communities around the Sea. This is discussed in Section 5.2, Air Resources effects section.</p>
52-14	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<p>Recommendations: The EPA suggests the Corps consider the following items to enhance the analysis and disclosure in the Final EA.</p> <ol style="list-style-type: none"> 1. Add census tract numbers associated with the five affected regions shown in the CalEnviroScreen maps in Figure 4-3 on page 4-44. 2. Include the results of an EJScreen6 analysis, to identify vulnerable communities with environmental justice concerns. Include maps from EJScreen that convey where these heavily burdened low-income and minority communities are located. Use EJScreen to identify existing environmental burdens with the Environmental Justice Indexes and Pollution and Sources layers. 3. Use the California Healthy Places Index7 online tool to help better describe existing health challenges in the area. 	<ol style="list-style-type: none"> 1. The CalEnviroScreen map in Figure 4-4 (Table 4-3 in the Draft EA) was updated to include census tract numbers and the corresponding paragraph was updated to reflect this change. 2. An EJScreen Analysis was created as well as two maps that provide a visual of where low-income and minority populations are located. 3. The California Healthy Places Index (HPI) online tool was utilized to describe what community characteristics are most adversely affecting the health of the inhabitants of the Salton Sea Region. A map and table were also created using HPI. 4. Note that some figure and table numbers have changed from the Draft EA.
52-15	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<p>Community Outreach and Meaningful Involvement</p> <p>EPA's own use of EJScreen indicates that census block groups in and near the project area have high concentrations of linguistically isolated populations. We support the Corps' efforts to provide Spanish translations during the recent public meetings hosted for this Draft EA. We recommend that a summary of all efforts that were made to address language barriers be included in the Final EA.</p>	<p>Section 8.7 detailing Public Outreach/Involvement was updated to include efforts that were made to address linguistic barriers to participation.</p>

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52-16	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Recommendations: <ul style="list-style-type: none">Summarize the community outreach efforts undertaken by the Corps and other participating agencies. Discuss efforts that were made to address language and technology barriers to ensure that all potentially affected populations were meaningfully engaged.Describe any environmental justice concerns raised during scoping meetings or other forms of community engagement.Describe how information gathered during community outreach efforts was used to inform project design and mitigation measures to respond to the needs of communities that would be adversely affected by the project.	<p>In order to inform the surrounding community about the live meetings, advertisements were sent out in multiple formats to the public in both English and Spanish. To account for technological and other potential barriers, these advertisements were released in a variety of formats including physical flyers, advertisements, mailers, social media ads, and radio PSAs. Physical signs will be placed at project sites. Comments received in the Notice of Intent and concerns raised during the July public meetings and comments submitted during the public comment periods were reviewed and taken into consideration when writing the Final EA.</p> <p>Section 8.7 of the Final EA provides an overview of the public outreach and public involvement conducted as part of developing the SSMP and preparing the EA. This section has been updated to provide more detail regarding this coordination (including tribal coordination and consultation), and to state that additional opportunities for outreach for other related programs (e.g., Long-Range Plan) are ongoing.</p>
52-17	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	California Assembly Bill 617 <p>The project area is located near Eastern Coachella Valley⁸ and El Centro/Heber/Calexico⁹ communities that faces a high cumulative exposure burden to criteria pollutants and toxic air contaminants and were selected by the California Air Resources Board to participate in the state's Community Air Protection Program pursuant to California Assembly Bill 617. Local air agencies have been working with the communities and other stakeholders to develop and implement air quality monitoring and emission reduction programs to address disproportionate air pollution impacts. Based on the Draft EA, it is unclear whether the Corps or project partners have been involved with the Eastern Coachella Valley AB 617 effort or the El Centro/Heber/Calexico AB 617 effort. Given that the proposed project's restoration and dust suppression measures have the potential to address existing air quality issues affecting the AB 617 communities, we recommend that the Corps coordinate with the AB 617 community groups to ensure that these efforts are aligned.</p>	<p>The SSMP team has been involved and will continue its ongoing collaboration with designated communities under AB 617. Also refer to Response to Comment 52-16.</p>
52-18	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Recommendations: <ul style="list-style-type: none">Proactively engage with the AB 617 community groups to inform the Final EA and project implementation. Offer them opportunities to inform the project's design and mitigation and provide regular project-related updates and document comments.In the Final EA, describe the coordination that has taken place with the AB 617 community and demonstrate how the project is consistent with the emission monitoring and reduction program that is being developed.	<p>Section 8.7 of the Final EA (Public Outreach/Involvement) has been updated to reflect the extensive community outreach activities conducted for the SSMP.</p>
52-19	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Tribal Consultation under Executive Order 13175 <p>Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the United States government-to-government relationships with Indian tribes.</p>	<p>Comment noted.</p>
52-20	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<p>The status of Tribal Consultation – whether, when, or how it has taken place – is unclear in the Draft EA. The Cultural Resources section indicates that “consultation with tribal groups [...] is being initiated” (p. 5-83). In the Coordination section, the document indicates that “[tribal] consultation has been initiated.” According to federal guidance, including from the Advisory Council on Historic Preservation, meaningful consultation means, in part, that communication about a federal decision occurs early and often in the planning process.¹⁰ EPA Region 9 has a robust tribal program. If you need assistance with identifying tribal contacts, please contact us.</p>	<p>Section 8.3 of the EA has been updated to reflect the completion of Section 106 consultation which includes tribal consultation. Compliance with Section 106 resulted in the preparation of a Programmatic Agreement between the Corps, the State, Cooperating Agencies, the Advisory Council on Historic Preservation, and interested tribes. The PA will be implemented for each planned project associated with the SSMP.</p>

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52-21	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Recommendations: <ul style="list-style-type: none">• Add a section that describes the process and outcome of government- to-government consultation between the Corps and each stakeholder tribal government.• Summarize issues that were raised and how those issues were addressed in the development of alternatives and mitigation, while respecting information that may be considered confidential to the respective tribe.• For this and future consultation, the June 2021 guidance from the Advisory Council on Historic Preservation, Consultation with Indian Tribes in the Section 106 Review Process: The Handbook, may be useful in developing guiding principles for consultation. It also contains best practices for communication.	Refer to Response to Comment 52-20.
52-22	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	General Conformity Project activities are proposed to occur in several areas designated as nonattainment or maintenance for 8-hour ozone, 24-hour particulate matter less than 2.5 microns (PM2.5), annual PM2.5, and 24-hour particulate matter less than 10 microns (PM10) national ambient air quality standards (NAAQS). The EPA’s General Conformity rule under the Clean Air Act (CAA) Section 176(c)(1) and 40 CFR 93.150-165 applies to Federal actions in areas designated as nonattainment or maintenance for NAAQS. The Draft EA acknowledges that emissions from the proposed project would contribute incrementally to violations of ozone, PM2.5, and PM10 standards; however, the Corps’ approach to General Conformity compliance is unclear. Appendix C includes estimates of criteria pollutant emissions for the proposed project and alternatives.	Project assumptions regarding equipment usage and construction duration provided in the Draft EA were used to conduct a general conformity analysis for the Final EA. This analysis is provided as a new appendix, Appendix D-1. Emissions were calculated using the California Emissions Estimator Model (CalEEMod) which is able to include mitigations in the emissions calculations. In addition, Section 5.2 (Air Resources, Effects Analysis) has been revised to reflect this analysis, and to respond to USEPA and other comments regarding air resources. For all pollutants, emissions are below significance thresholds and de minimis thresholds and, therefore, impacts would be less than significant.
52-23	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	To demonstrate that the proposed project and action alternatives conform to the applicable state implementation plan, the Corps should first determine whether the total of direct and indirect emissions of each applicable pollutant and the relevant precursors ¹¹ exceed the applicable de minimis threshold at 40 CFR 93.153(b). Then, if emissions exceed the applicable de minimis threshold, the Corps must demonstrate conformity of the project using one of the options under 40 CFR 93.158.	Refer to comment response 52-22.
52-24	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	The activities described in the Draft EA would occur in multiple nonattainment or maintenance areas for the same NAAQS. Pursuant to 40 CFR 93.150(e), General Conformity for actions resulting in emissions originating in more than one nonattainment or maintenance area must be evaluated for each area separately. Activities would occur in the following nonattainment and maintenance areas: <ul style="list-style-type: none">• Imperial County for the 2006 24-hour and 2012 annual PM2.5 NAAQS;• Coachella Valley and Imperial Valley planning areas for the 1987 PM10 NAAQS;• Riverside County (Coachella Valley) and Imperial County for the 2008 and 2015 8-hour ozone NAAQS.	Refer to comment response 52-22.
52-25	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Recommendations: <ul style="list-style-type: none">• Provide emissions estimates of ozone precursors (NOX and VOC), PM2.5 and PM2.5 precursors (SO2, NOX, VOC, and ammonia), and PM10 for the proposed project and for each alternative, and in each applicable nonattainment and maintenance area where project activities would occur.• Compare the alternatives’ emissions of the relevant pollutant(s) within each area to the applicable de minimis threshold 40 FR 93.153(b) for each nonattainment and maintenance area to determine whether General Conformity applies.• If project emissions exceed the applicable de minimis threshold for any pollutant, demonstrate that the emissions conform to the applicable state implementation plan using the criteria for demonstrating conformity under 40 CFR 93.158. We encourage the Corps to consult with EPA Region 9 staff to ensure that proper techniques are used to evaluate conformity for the proposed project activities.	Refer to comment response 52-22.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
52-26	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<u>Water Resources</u> <i>Groundwater Quantity Impacts.</i> The project cites agricultural return flows as a primary source of water for restoration and dust suppression activities, and it also contemplates pumping groundwater from a deeper aquifer system to make up needed water; however, the Draft EA concludes that the project “would have little effect on groundwater availability or quality” (p. 5-139). The description of impacts in section 5.12.3 of the Draft EA on Groundwater Hydrology and Quality also appears to confound the deep and shallow aquifer systems where it concludes that “[t]he Proposed Project would not directly change the volume and capacity, producibility, quality, renewability or recharge of underlying groundwater basins, and, therefore, would not create a substantial effect on groundwater availability” (p. 5-139). It is unclear how this conclusion was reached if the deep aquifer pumped for the project is expected to recharge shallow aquifers.	Refer to updated Appendix C (was Appendix F in Draft EA), which has been revised in the Final EA to include additional modeling results and to present the water demand by individual project component and alternative. New Final EA Figure 5-4 presents potential well locations, should groundwater sources be required for long-term management of salinity concentrations of aquatic habitat restoration areas. Table 3-7 (new in the Final EA) presents the quantities of water for different project components. Section 3.17 (a new section in the Final EA) describes the context and reasoning for evaluating the groundwater use and quality impacts. The effects and mitigation measures related to groundwater are discussed in Section 5.16 (Effects Analysis, Water)
52-27	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<i>Recommendations:</i> <ul style="list-style-type: none">• Include details on the expected water budget for the project, considering water volumes and timing needed to maintain a non-friable lakebed surface. Ensure that sources from agricultural return flows and deep groundwater are included, and include evapotranspiration, shallow aquifer recharge, and ponding in the sinks.• For the deep aquifer system, use a conservative estimate of needed make-up water, and reasonable assumptions for well locations, to model the contribution of the project to drawdown of the regional aquifers. Explain this water usage in the regulatory context of California's Sustainable Groundwater Management Act.• <u>If the Corps is intending to rely on incorporation by reference for the analysis of these impacts, include citations to documents and page numbers and make the documents available to the public (40 CFR § 1501.12 <i>Incorporation by reference</i>).</u>	Refer to Appendix C (was Appendix F in Draft EA), which has been revised in the Final EA to include additional modeling results and to present the water demand by individual project component and alternative. References in support of Appendix C modeling have been added and are included in the Administrative Record. This is also discussed in new Section 3.17 of the Final EA.
52-28	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<i>Water Availability.</i> From the descriptions in the Draft EA, the project would largely rely on existing diversions and agricultural return flows to supply water for the project, but, as mentioned above, the analysis does not appear to disclose a water budget for implementing the project. As more water conservation measures are carried out by agricultural water users and as climate change further stresses existing water supplies, decreasing water availability for the project could affect its implementation and exacerbate community dust exposure. We recommend the EA include additional detail on water supplies available for the duration of the project and a plan for accommodating potential changes to water supplies.	Refer to Appendix C (was Appendix F in Draft EA), which has been revised to include additional modeling results and to present the water demand by individual project component and alternative. This master table on water budgets has also been included as Table 3-7 in new Section 3.17 in the Final EA.
52-29	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<i>Recommendations:</i> For the Final EA, develop and include an adaptive management plan addressing water supplies for implementing the project and to demonstrate that this usage is sustainable. Include consideration of the effects of climate change projections and regional trends in population growth and water management.	An adaptive management plan will be prepared for each project, as described in Section 3.15.1 once the EA is complete. In Section 3.0 it is noted that project sizes are dependent on water availability, and may need to change during final design as more refined water estimates are developed. Updated Appendix C (Appendix F in the Draft EA) presents an analysis of the Salton Sea under different inflow scenarios which consider different policy and climate change considerations. The specific analysis in Section 5.16 (Effects Analysis, Water) is based on the most probable flow presented in the Hydrology Memo that is part of the Long-Range Plan. However, the updated Appendix C also includes analysis of the impacts on the Salton Sea for two other flow scenarios in the Hydrology Memo, low probability flow and very low probability flow.
52-30	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<u>Section 404 Letter of Permission Procedures</u> Pursuant to the State of California's Natural Resources Agency, Department of Water Resources, and California Department of Fish and Wildlife's request to establish new Letter of Permission (LOP) procedures, under the Corps' Proposed Letter of Permission Procedures for Salton Sea Management Program 10-Year Plan a “Pre-Application Coordination” meeting would be required for individually proposed projects. Since the EPA would typically comment on individual Public Notices in the absence of the LOP procedures, we request the opportunity to participate in this coordination.	Comment noted. The LOP procedures were updated to reflect USEPA Region 9's early coordination during the CWA Section 404 permitting process.

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52-31	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<i>Recommendation:</i> Invite the EPA Region 9 Wetlands Section to individual Pre-Application Coordination meetings proposed under the SSMP LOP Procedures. Please send invitations and meeting materials to Sarvy Mahdavi at [REDACTED (b)(6)].	Comment noted. The USEPA Region 9 Wetlands Section is identified in the LOP Procedures as an agency that will be invited to pre-application meetings for all projects requiring authorization under the LOP Procedures.
52-32	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	<u>Additional Recommendations</u> Page 2-3 of the current Draft EA mentions health in communities but does not identify vulnerable communities. We suggest using CalEnviroScreen, EJScreen and the Health Equity Index to elaborate on this disclosure.	Figure 4-3 in the Draft EA that utilized Cal Enviro Screen as well as Table 4-24 have been updated (Figure 4-4 and Table 4-18, respectively, in the Final EA) to include census tracts, which identifies communities in the area surrounding the Salton Sea that experience a higher pollution burden and provides a visual map of where more vulnerable communities are located. EJScreen maps and data were added. The Healthy Equity Index was not available for public use.
52-33	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	The Hazardous Waste and Materials Sections notes mosquitos and past issues with St. Louis Encephalitis and West Nile Virus. Pooling of water from equipment left out could create a breeding space for mosquitos. Consider mitigation to reduce this potential from construction activities by including a measure to check for pooling of water on equipment and materials.	Comment noted. Such standard measures would be incorporated into the Mosquito Control Plan required by MM HAZ-4 (Develop and Implement a Mosquito Control Plan) as well as the project SWPPP that must be developed and accepted for enrollment of the Project in the State Water Resources Control Board's Construction Stormwater Program (Construction General Permit Order 2009, 0009-DWQ, as amended by 2010-0014-DWQ, 2012-0006-DWQ, and 2022-0057-DWQ) prior to construction.
52-34	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Discuss how the project would ensure equitable access to public amenities associated with the project, such as picnic areas and trails, for low-income communities and communities of color.	<p>The updated Environmental Justice Section 4.6.3.3 of the Final EA (formerly Section 4.5.3.3 of the Draft EA) determined that the communities with the highest concentration of both people of color and low income residents are located on the northern and southern ends of the Salton Sea. However, in regard to income specifically, Section 4.6.3.2 of the Final EA was updated to include California Health and Safety Code Sec. 116760.20, which classifies all of the census tracts that border the Salton Sea qualify as severely disadvantaged. While this analysis can certainly be utilized to help inform future decisions regarding how to make public amenities more accessible, the current scope of the Proposed Project does not include the designation of any specific areas for public use activities.</p> <p>The purpose of the Proposed Project is to create projects that provide wildlife habitat and suppress dust (see Section 2.0, Purpose and Need). Public use activities are included to the extent they are compatible with the purpose and need of the Proposed Project, and may include picnicking, hiking, birdwatching, non-powered watercraft use, and hunting. Any such amenities would be equally accessible to all members of the public.</p>
52-35	8/4/2022	Letter	Jean Prijatel Manager, Environmental Review Branch, USEPA	Please define “ecosystem-friendly options” with respect to dust suppressants (p. 3-16).	Ecosystem friendly options reflect the availability of non-toxic biodegradable surfactants for dust suppression. MM BIO-1 in the Final EA includes a provision stating that if surfactants are applied, a surfactant application plan would be prepared that identifies application measures and locations that reduce and avoid effects.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
53	8/17/2022	Letter	NRCS	This letter serves as the United States Department of Agriculture, Natural Resources Conservation Service (NRCS) formal comments, as a Cooperating Agency, on the Salton Sea Management Program Phase 1: 10-Year Plan Imperial and Riverside Counties, California Draft Environmental Assessment (SSMP Plan EA). As a cooperating agency NRCS continues its commitment to provide resources to help fulfill the requirements of your agency while working towards completing a Watershed Plan document that meets watershed program requirements. An approved Watershed Plan is the required mechanism for NRCS to authorize funds for project implementation, which is the primary purpose for NRCS to participate as a Cooperating Agency on the EA. As part of NRCS watershed project review process, a cursory technical review was conducted by our National Water Management Center (NWMC) to ensure that all the statutory requirements under the Watershed and Flood Prevention Operations (WFPO) Program were followed. This letter collectively represents the comments from all levels of review within the NRCS. The format for the SSMP Plan EA was agreed upon early in the drafting process whereby the EA would be written to analyze the effects of the proposed project in an alternate format to the standard requirements of an NRCS Plan-EA document, pending a format waiver from the NRCS Chief. Later it was decided that the Plan-EA document would be an appendix to the SSMP EA (currently Appendix B) and would include the additional analyses required under the WFPO Program. The required components of a Plan EA, as explained in Part 501.31 of the NRCS National Watershed Program Manual (NWPM), was provided to Cardno, Inc. at the onset of the SSMP EA development and were reemphasized by NRCS staff throughout development in meetings and in comments on the SSMP Plan EA drafts. While the SSMP Plan EA satisfies the general requirements of an environmental assessment as analyzed under NEPA, it is still in need of some additional analysis to satisfy the requirements of the WFPO program. NRCS requests that the following deficiencies be addressed to ensure that the NRCS is able to authorize funds for future project implementation:	<p>Comment noted. Based on comments 53 - 53-9 and further discussion it was determined that NRCS would begin a supplement to the EA to satisfy the requirements of the WFPO. The Watershed Plan could use the EA to tier from and conduct the additional analysis as required by NRCS. The NRCS will work with the CNRA as the local sponsor organization to determine the path forward for a Watershed Plan.</p> <p>All references and appendices that refer to the Watershed Plan and NRCS has been updated for the EA or removed to accommodate the NRCS template and plan to move forward with a Watershed Plan.</p>
53-1	8/17/2022	Letter	NRCS	1. The Watershed Plan currently included as Appendix B to the SSMP Plan EA document should be modified to follow the NRCS NWPM template stipulated in Part 501.31 of the NWPM. This will fill in the missing information and data required by statute for the NRCS to provide implementation funds in the future. If a required section of the NWPM template is already analyzed in the SSMP Plan EA, a reference to the location in the SSMP Plan EA where the information can be found is adequate.	Refer to comment response 53.
53-2	8/17/2022	Letter	NRCS	2. The title of Appendix B should read "NRCS Watershed Plan-EA." References to the plan in the body of the SSMP Plan EA document should specifically state "NRCS Watershed Plan."	Refer to comment response 53.
53-3	8/17/2022	Letter	NRCS	3. The SSMP Plan EA should explicitly identify the Preferred Alternative which can be carried through to the NRCS Watershed Plan. Currently there is a No Action alternative, a Proposed Project, and 6 alternatives. We recommend changing the name of the "Proposed Project" to the "Proposed Alternative" to better align with standard NEPA analysis terminology.	Refer to comment response 53.
53-4	8/17/2022	Letter	NRCS	4. As set forth in Section 1 of Public Law 86-566, NRCS WFPO Program plans must fall under one of three general purposes, (refer to Section A, Part 500.3 of the NWPM): (i) Preventing damage from erosion, floodwater, and sediment (ii); Furthering the conservation, development, utilization, and disposal of water (iii); Furthering the conservation and proper utilization of land. Currently neither the SSMP Plan EA or the Appendix B Watershed Plan explains how the proposed project addresses a problem within one of these general purposes. Identifying the general purpose for developing a watershed plan in the Appendix B Watershed Plan will address this deficiency.	Refer to comment response 53.
53-5	8/17/2022	Letter	NRCS	5. Related to item 4 above, an Authorized Project Purpose, defined in Section B of Part 500.3 NWPM (also outlined Sections 3 and 4 of Public Law 83-566), must be identified. There are seven authorized project purposes, three of which are potentially applicable to the SSMP Plan EA: Watershed Protection, Public Recreation, and Public Fish and Wildlife. We recommend focusing on Watershed Protection as the primary purpose because it encompasses both soil and fish and wildlife conservation. Although air quality is not explicitly identified under one of these purposes, soil erosion is a component of Watershed Protection and is the source of the significantly degrading air quality. Identification in the SSMP Plan EA and in the Appendix B Watershed Plan of one or more authorized project purposes including an explanation of how it applies to the proposed alternative will address this deficiency.	Refer to comment response 53.

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53-6	8/17/2022	Letter	NRCS	6. The economics analysis currently shows the secondary public health benefits of controlling erosion in the Salton Sea. This analysis however should be supplemented with economic data to conform to the NRCS PR&G required economics analysis. Specifically, the analysis of project benefits must be in alignment with the project purpose (see item #4 above), i.e. the Plan EA cannot identify habit restoration and dust suppression as the project purpose and then identify public health benefits for dust suppression as the sole economic benefit of the projects. We recommend focusing the economics analysis on the purpose of Watershed Protection. This creates a clear connection between the project purpose, the actions to address the problems and the economics analysis that justifies the financial expenditure. Resolving this may require additional analysis to quantify the level of wind erosion that would happen in a project area due to the anticipated evaporation of the Salton Sea, the cost to the public for treating the associated health issues, and the financial benefits of addressing the erosion issue.	Refer to comment response 53.
53-7	8/17/2022	Letter	NRCS	7. Also related to economics, air quality secondary benefits are claimed outside of the project area. This can be addressed with a more robust discussion of the project area and the watershed area. The Salton Sea Air Basin closely aligns with the Salton Sea basin watershed and seems to work as a good metric for evaluating effects to human health from soil erosion at the watershed level. We recommend using this metric when evaluating the affected population. As with item #6, resolving this may require additional analysis to quantify the level of wind erosion that would happen in a project area due to the anticipated evaporation of the Salton Sea, the cost to the public for treating the associated health issues, and the financial benefits of addressing the erosion issue.	Refer to comment response 53.
53-8	8/17/2022	Letter	NRCS	8. The word “may” was repeatedly used when referencing activities, for example “...may be used for dust suppression and/or habit restoration”. In order for the NRCS to provide funding for implementation of the activities included in the Watershed Plan the activities and general location must be clearly stated. Some or all of the proposed activities could be funded by NRCS and therefore need to be described as if they are the proposed activities. NRCS recommends changing the word “may” to “will” where applicable to address this issue.	Refer to comment response 53.
53-9	8/17/2022	Letter	NRCS	9. Regarding consultation requirements for cooperating agencies, it is not clear how the NRCS’s responsibilities under the National Historic Preservation Act will be addressed by a programmatic agreement between the Corps and the State Historic Preservation Officer when the Corps is acting as the Lead Federal Agency on behalf of all federal cooperating agencies. The same applies to the programmatic biological assessment/opinion with the USFWS. The SSMP Plan EA and the Appendix B NRCS Watershed Plan document will need to specifically refer to this process.	Refer to comment response 53.
54	8/18/2022	Email	Coachella GSA	On behalf of the Groundwater Sustainability Agencies (GSAs) of the Indio Subbasin of the Coachella Valley, attached are our comments on the Salton Sea Management Program Phase 1: 10-year Plan Draft Environmental Assessment (EA). The Indio Subbasin GSAs appreciate the valuable opportunity to provide comments on the Draft EA. We urge careful consideration of our comments before finalizing the EA or making any determination. The Indio Subbasin GSAs look forward to continued engagement and cooperation on this matter. For any questions regarding these comments, please contact Zoe Rodriguez del Rey, Water Resources Manager, at [REDACTED (b)(6)]	Comment noted.

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54-1	8/18/2022	Letter	Coachella GSA	<p>The Draft EA analyzes the Proposed Project and Alternatives for the construction of aquatic habitat restoration and dust control suppression projects within the exposed lakebed areas surrounding the Salton Sea. According to the Draft EA, the project’s water needs will be supplied by the Coachella Valley Stormwater Channel, Alamo River, New River, agricultural drains around the Sea, and potentially groundwater and recycled water. We would like to express concern that groundwater extractions from the Indio Subbasin, from the shallow or deep aquifer, for the purposes of supplying these projects were not included in the recently completed 2022 Alternative Plan Update. The Indio Subbasin GSAs held seven public workshops during the development of the Alternative Plan Update to gather input from the stakeholders on all elements of the plan including projected water demands. Since groundwater demand from these projects was not included in the 2022 Alternative Plan Update the impact to the subbasin’s sustainability and compliance with SGMA has not been analyzed.</p>	<p>Refer to updated Appendix C (was Appendix F in Draft EA), which has been revised in the Final EA to include additional modeling results and to present the water demand by individual project component and alternative.</p> <p>Table 4-51 in the Final EA (Table 4-43 in the Draft EA) has been augmented to include the Sustainable Groundwater Management Act of 2014 and the local 2022 Indio Subbasin Water Management Plan Update that was adopted in December 2021.</p> <p>Effect GW-1 (Project implementation would have little effect on groundwater availability or quality) has been updated for the Proposed Project and alternatives to include more specific information about water demand for each alternative, as well as where groundwater may be needed. To ensure that no significant effects would occur, a new mitigation measure, MM GW-1 (Coordination with Indio Subbasin GSAs regarding groundwater extraction in the Coachella Valley Subbasin) has been added to the Final EA in Section 5.16 (Water, Effects Analysis) to require coordination with the Indio Basin GSAs so as not to affect subbasin sustainability with SGMA as part of implementation of the Indio Subbasin Alternative Plan. Note that Section 5.16 in the Final EA was Section 5.12 in the Draft EA.</p>
54-2	8/18/2022	Letter	Coachella GSA	<p>As such, and given the current lack of specificity in the Draft EA regarding the amount of potential groundwater extraction from the Indio Subbasin, we would like to clearly and strongly convey that any additional demand on the groundwater from the Indio Subbasin not considered in the 2022 Alternative Plan Update is unlikely to be sustainable and would in all likelihood result in a range of undesirable impacts that must be analyzed. This includes the potential for degraded water quality impacts from saline water intrusion into the deep aquifer from both the Salton Sea and shallow groundwater that is naturally high in salts. The Indio Subbasin GSAs have an obligation to manage the basin to avoid returning to overdraft conditions and any associated significant and unreasonable undesirable results. To this end, the 2022 Alternative Plan Update established minimum groundwater level thresholds based on best available historical information. Any plans to extract groundwater from the Indio Subbasin for the purposes of supplying water to the Salton Sea Projects must be developed in coordination with the GSAs with clarity about the amounts and locations of any groundwater extractions from the Indio Subbasin.</p>	<p>Refer to comment response 54-1.</p>
54-3	8/18/2022	Letter	Coachella GSA	<p>We, therefore, request that the EA recognize the need to conduct additional environmental review on groundwater extractions from the Indio Subbasin and refrain from any determination on the impact to groundwater availability or quality until such time as the amount of groundwater extractions from the Indio Subbasin is known and adequately analyzed. We also request that the EA include requirements for coordination with the GSAs and acknowledgement that any potential groundwater extractions from the Indio Subbasin must be consistent with the goals of SGMA. The EA must also acknowledge and consider the impacts of climate change to groundwater resources in the Indio Subbasin as was done in the 2022 Alternative Plan Update.</p>	<p>Refer to comment response 54-1.</p>
54-4	8/18/2022	Letter	Coachella GSA	<p>Comment 1. Groundwater Hydrology and Quality</p> <p>The study area for analysis of hydrology and water quality includes seven basins, including the Indio Subbasin of the Coachella Valley Basin. The Draft EA incorrectly states that these basins represent the shallower portions of the Salton Sea basin and do not correspond to deeper formations or water bearing deposits that extend to the bedrock (p. 4-116). Water yielding wells in the Indio Subbasin are drilled to more than 1,000 feet and are the sole source of drinking water for the communities of the Coachella Valley.</p>	<p>Information regarding the Indio Subbasin was added to Table 4-58 (Project Area Groundwater Basins) (was Table 4-50 in the Draft EA) in Section 4.16.3.4 (Groundwater Hydrology and Quality, Affected Environment) of the Final EA. Also note that the two subbasins of the Borrego Basin have been deleted, as they are not in the Project area. In addition, Section 4.16.3.4 has been revised to state that water yielding wells in the Indio Subbasin are drilled to more than 1,000 feet and are the sole source of drinking water for the communities of the Coachella Valley.</p> <p>Also refer to comment response 54-1.</p>

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54-5	8/18/2022	Letter	Coachella GSA	Section 4 of the EA must recognize and consider that the Indio Subbasin is unique among the other basins surrounding the Salton Sea with many beneficial uses and users. While the Draft EA recognizes groundwater use by [Coachella Valley Water District (CVWD)], it fails to recognize that it is the sole source of drinking water for the Coachella Valley municipal demands served by CVWD, CWA [Coachella Water Authority], DWA [Desert Water Agency], IWA [Indio Water Authority], and many mutual water companies and small water systems. The Indio Subbasin also provides for the water needs of domestic wells and other private pumpers. CVWD and DWA replenish the Indio Subbasin to supplement limited natural recharge that is significantly less than groundwater demands. Any additional demands on the Indio Subbasin must be carefully considered and mitigated through additional replenishment of imported water, additional development of recycled water, or future restrictions on water use.	Information regarding the Indio Subbasin was added to Table 4-58 (Project Area Groundwater Basins) (was Table 4-50 in the Draft EA) in Section 4.16.3.4 (Groundwater Hydrology and Quality, Affected Environment) of the Final EA. Refer also to comment response 54-1.
54-6	8/18/2022	Letter	Coachella GSA	The Indio Subbasin is also the only one of the seven basins surrounding the Salton Sea that is subject to SGMA. While Table 4-40 recognizes that the CVWD completed a water management plan in 2002, this plan has been updated several times to ensure that historical overdraft was eliminated and mitigated into the future. The latest update submitted to DWR in compliance with SGMA is the 2022 Alternative Plan Update.	The commenter is assumed to refer to Draft EA Table 4-43, Regulatory Requirements for Water Resources, that is now Final EA Table 4-51. Table 4-51 has been revised to describe SGMA and the 2022 Alternative Plan.
54-7	8/18/2022	Letter	Coachella GSA	We therefore request that the EA recognize and accurately describe the groundwater hydrology and beneficial uses of the Indio Subbasin, the 2022 Alternative Plan Update, and the requirement to sustainably manage this subbasin in a manner that mitigates overdraft and other undesirable results in accordance with SGMA. Table 4-43 should include SGMA as one of the regulatory requirements for water resources that is applicable to the Indio Subbasin; and include CVWD, CWA, DWA, IWA (Indio Subbasin GSAs), DWR, and State Water Resources Control Board (SWRCB) as the agencies responsible for implementing this California law.	Table 4-51 in the Final EA (was Table 4-43 in the Draft EA) was revised to include SGMA and the Groundwater Sustainability Plan for the Indio Subbasin. Table 4-58 in the Final EA (was Table 4-50 in the Draft EA) was revised to present the Indio Subbasin separately from the Coachella Valley Basin.
54-8	8/18/2022	Letter	Coachella GSA	Comment 2. Effects on Groundwater Hydrology The Draft EA concludes that the Proposed Project and Alternatives would have little effect on groundwater availability or quality (GW-1, p. 5-127). However, the Draft EA does not describe the use of groundwater with respect to location or amount, making it impossible to evaluate this conclusion for the Indio Subbasin. The EA must be clear and transparent about any amount of groundwater that would be extracted from the Indio Subbasin before drawing such a significant conclusion or must recognize that additional environmental review will be needed in the future to evaluate impacts from groundwater extractions in the Indio Subbasin.	Refer to comment response 54-1.
54-9	8/18/2022	Letter	Coachella GSA	Furthermore, we would like to express our concern that the above conclusion, as it applies to the Indio Subbasin, is based on some incorrect assumptions about the groundwater hydrology of the Subbasin. For example, the Draft EA states that: <i>Any groundwater applied for dust suppression and restoration features would typically be extracted from existing wells that draw from the deep aquifer and would not have a direct adverse effect to the shallow water table. In the future, if shallow groundwater is considered towards potential water supply for the Proposed Project, additional environmental review would be needed before the groundwater supply can be used. (pp. 5-140 and 5-141).</i>	The text referred to in Section 5.16.3 of the Final EA (was Section 5.12.3 of the Draft EA) has been revised to address this concern. Refer also to comment response 54-1.
54-10	8/18/2022	Letter	Coachella GSA	The hydrostratigraphy in the southeastern portion of the Indio Subbasin (East Coachella Valley) has the following characteristics: <ul style="list-style-type: none">• A shallow semi-perched zone consisting of recent silts, clays, and fine sands• An upper aquifer with unconfined (water table) conditions• A semi-confining aquitard of fine-grained materials• A lower aquifer with confined and artesian conditions	Refer to revisions made to Final EA Table 4-58 (was Table 4-50 in the Draft EA), which now presents Indio Subbasin separately from the Coachella Valley Basin, and includes some of this information.

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54-11	8/18/2022	Letter	Coachella GSA	The fine-grained materials of the semi-confining aquifer are not regionally extensive or thick enough to completely restrict vertical groundwater flow between the upper and lower aquifer zones. Similarly, although the materials in the semi-perched zone are of low permeability, conditions in the lower and upper aquifer can impact the shallow water table in this zone. A combination of rising groundwater and irrigation water applied to agricultural lands has maintained the semi-perched groundwater in the East Coachella Valley, necessitating the construction of an extensive subsurface tile drain system to reclaim these lands for agriculture. Deep groundwater pumping in the East Coachella Valley not mitigated by imported water replenishment impacts not only shallow groundwater, but also the agricultural drain flows that are a significant source of water supply to the northern Salton Sea. Moreover, if the projects are located in a different subbasin than where groundwater is extracted, effective groundwater recharge would not take place.	Comment noted. Refer to comment response 54-1.
54-12	8/18/2022	Letter	Coachella GSA	Considering climate change, which is impacting Colorado River flows used to replenish the Indio Subbasin, it is vital that there be absolute transparency about the amount of any planned groundwater extractions from this Subbasin and an adequate consideration of the groundwater hydrology. It is simply impossible to assess impacts and evaluate the level of additional environmental review that will be needed without this level of information. The EA must accurately describe the groundwater hydrology of the Indio Subbasin and include the amounts of groundwater from the Indio Subbasin that would be extracted for the Proposed Project and Alternatives. If this information is not yet defined, then it should be recognized that more environmental review will be needed in the future once the amounts are known, and the EA should refrain from concluding that the Proposed Project and Alternatives would have little effect on groundwater availability or quality in the Indio Subbasin. The EA must also consider whether the effects of climate change on the availability of imported water from the Colorado River could exacerbate the impacts of the Proposed Project or Alternatives.	Comment noted. Refer to comment response 54-1.
54-13	8/18/2022	Letter	Coachella GSA	Comment 3. Coordination with the Indio Subbasin GSAs Section 8 of the Draft EA should include the Indio Subbasin GSAs among the agencies that must be consulted. The Indio Subbasin GSAs have authorities and responsibilities to sustainably manage groundwater within the Subbasin. Any proposals to extract groundwater from the Indio Subbasin for the Proposed Project or Alternatives must be developed in consultation with the GSAs to ensure that they are consistent with the plans developed to sustainably manage the Indio Subbasin.	Refer to comment response 54-1.
54-14	8/18/2022	Letter	Coachella GSA	Conclusion The Indio Subbasin GSAs appreciate the valuable opportunity to provide comments on the Draft EA. We urge careful consideration of our comments before finalizing the EA or making any determination. The Indio Subbasin GSAs look forward to continued engagement and cooperation on this matter.	Comment noted.
55-1	8/19/2022	Email	Jenny E. Ross	I. Summary A. The SSMP's 10-Year Plan was intended to be – and should be designed and implemented as – an interim plan to address the most urgent needs for habitat and dust control at the shrinking Salton Sea. The selected components should be executed quickly and efficiently, and should remain in place on a temporary basis until a long-range plan for Salton Sea restoration is achieved. B. Based on the extremely slow pace at which the SSMP has been proceeding with constructed habitat and dust mitigation measures, it appears extremely unlikely that planning, design, and construction of the 10-Year Plan “Proposed Project” as currently envisioned – or the 10-Year Plan as presented in “Alternatives” 1, 2, 3, and 5 – will be completed by 2028 as assumed in the Draft EA. C. The SSMP should proceed as quickly as possible with design and implementation of a revised 10-Year Plan that uses a modified subset of the components in the 10-Year Plan “Proposed Project” and that incorporates some amended features of the “Water Conservation” proposal presented as Alternative 4, if additional water is available. Alternatively, the SSMP should proceed with a modified version of Alternative 4. D. Concurrently with the implementation of the 10-Year Plan, the SSMP should also prioritize and move forward expeditiously with a long-range plan for full restoration of the Salton Sea.	Refer to comment responses 55-2 through 55-150.

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55-2	8/19/2022	Email	Jenny E. Ross	<p>II. Goals of the 10-Year Plan</p> <p>The purpose of the SSMP’s Phase 1: 10-Year Plan (“10-Year Plan”) ¹ is to provide urgently-needed habitat and dust control measures to protect wildlife and public health on an interim basis while a long-range plan for Salton Sea restoration is developed and implemented.</p> <p>The specific goals of the 10-Year Plan as set forth in the California Natural Resources Agency’s 2021 Updated Draft SSMP Phase 1: 10-Year Plan Project Description (“2021 Draft 10-Year Plan Description”), and as embodied in the requirements of California State Water Resources Control Board (SWRCB) Order WR 2017-0134 (“WR 2017-0134,” appended as Attachment 1) are:</p> <ul style="list-style-type: none">“...to create at least 14,900 acres of aquatic habitat replacement for near- and mid-term habitat losses by 2028. The Project’s target species are those that use the Salton Sea and are dependent on the Salton Sea ecosystem for essential habitat requirements and the viability of a significant portion of their population.” ²“...to address air quality issues at the Salton Sea impacting human health in communities surrounding the Sea by reducing emissions of fugitive dust from the exposed lakebed. The balance of the remaining acreage (up to 14,900 acres) [required to be completed by 2028 pursuant to WR 2017-0134] that are not designed as aquatic habitat would be proposed for dust suppression activities.” ³ <p>Similarly, as defined in the Draft EA for purposes of NEPA compliance, the goals of the 10-Year Plan are:</p> <ul style="list-style-type: none">“...to create at least 14,900 acres of aquatic habitat replacement by 2028 for near-and mid- term habitat losses. The Proposed Project’s target species are those that use the Sea and depend on its ecosystem for essential habitat requirements and the viability of a significant portion of their populations.” ⁴“...to address air quality issues at the Sea that affect human health in communities surrounding the Sea by reducing emissions of fugitive dust from soils on the exposed lakebed. The balance of the remaining acreage (up to 14,900 acres) [required to be completed by 2028 pursuant to WR 2017-0134] that is not designed as aquatic habitat would be proposed for dust suppression projects.” ⁵ <p>In addition, WR 2017-0134 stated and required the following:</p> <ul style="list-style-type: none">“The Board finds and declares... that implementation of projects to protect or improve air and water quality and wildlife habitat will be completed forthwith to avoid severe consequences to the State of California as a whole, to the health of Imperial and Coachella Valley residents, and to multiple wildlife habitats that exist at the Salton Sea and serve the Pacific Flyway.” ⁶“CNRA[the California Natural Resources Agency] will complete a long-term plan by no later than December 31, 2022.” <p>Thus, when evaluating the 10-Year Plan “Proposed Project” and “Alternatives” discussed in the Draft EA,⁸ it is essential to be mindful of the above goals, as well as the crucial fact that the 10-Year Plan has always been intended to be a short-term plan with limited aims and scope, to be implemented rapidly and completed by 2028 in order to address urgent problems. Furthermore, the 10-Year Plan was intended to be replaced expeditiously by a long-term plan.</p> <p>In the light of the above, as well as the issues discussed throughout the comments below, I suggest that the CNRA and SSMP should select, design, and implement only the proposed 10-Year Plan components that: (a) are focused on achieving the above limited goals; (b) will minimize or avoid a variety of significant associated risks and detrimental effects; (c) can be rapidly implemented most efficiently and effectively at lowest cost; and (d) will not interfere with prompt development and implementation of a long-term plan, or adversely affect the cost, operation, or maintenance of the long-term plan. Details regarding these issues are discussed in the remainder of these comments.</p>	Comment noted.

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55-3	8/19/2022	Email	Jenny E. Ross	III. Timing of the 10-Year Plan and Its Relationship to the Long-Range Plan A. Based on past SSMP performance and the current status of SSMP activities, it is very unlikely that construction of the 10-Year Plan's Proposed Project (or most of the Alternatives) will be completed by 2028 as assumed in the Draft EA. This fact has important implications for the choice of which proposed 10-Year Plan components should be implemented.	The SSMP 10-Year Plan projects are being developed to meet the targets defined in the SWRCB WR 2017-0134. These projects will provide benefits in the near-term while the Long-Range Plan is under development. We recognize that some SSMP 10-Year Plan projects will be more time-consuming to implement than others. However, we still expect the more complex SSMP 10-Year Plan projects to be implemented in advance of the Long-Range Plan projects. Therefore, it is important to implement SSMP 10-Year Plan projects first to alleviate more immediate impacts.
55-4	8/19/22	Email	Jenny E. Ross	III.A. continued 1. The first draft of the “Salton Sea Management Program Phase 1: 10-Year Plan” was issued in March 2017. The on-the-ground requirements for implementation of the 10-Year Plan were formalized when a pertinent stipulated order, WR 2017-0134, was adopted at a meeting of the SWRCB on November 7, 2017. WR 2017-0134 required the SSMP to begin implementing habitat and dust control measures on exposed lakebed in 2018, and to implement a minimum total of 29,800 acres of such measures by the end of 2028. ⁹ Moreover, WR 2017-0134 mandated that “no less than 50%” of that required acreage “shall provide habitat benefits for fish and wildlife that depend on the Salton Sea ecosystem.” ¹⁰ WR 2017-0134 further clarified, “Projects that provide habitat benefits for fish and wildlife do not include dust control projects that involve surface roughening, vegetation enhancement and surface stabilization”. 2. WR 2017-0134 required the SSMP to have completed a total of 7000 acres of habitat and dust control measures on exposed lakebed by the end of 2021, with no less than 50% of that total being habitat. However, according to the 2022 SSMP Annual Report (which overstates the amount accomplished pursuant to the requirements of WR 2017-0134, as explained below), by the end of 2021 the SSMP had actually implemented only 1,255 acres of dust suppression measures (with unclear efficacy), and had created just 22 acres of habitat (only for desert pupfish). Based on the SSMP's own accounting, this completed work represented only 18.24% of the total acreage required to be finished by the end of 2021 pursuant to WR 2017-0134. ¹¹ 3. The SSMP's accounting is faulty concerning the amount of work it completed by the end of 2021 pursuant to WR 2017-0134. A total of 522 acres the agency identifies as completed in 2021 in compliance with WR 2017-0134 consists of temporary dust control and pupfish habitat within the footprint of the Species Conservation Habitat (SCH) being constructed by the SSMP near the mouth of the New River. But the acreage requirements specified in WR 2017-0134 explicitly exclude the SCH; i.e., the acres of habitat and dust control measures that must be completed pursuant to the schedule set forth in WR 2017-0134 are in addition to those that are part of the SCH. Paragraph 24 of Exhibit A to WR 2017-0134 states, “...in addition to currently planned and funded habitat projects (Red Hill Bay, Torres Martinez wetlands and Species Conservation Habitat) and all QSA JPA funded Salton Sea mitigation projects, restoration milestones detailed below are necessary to address public health and environmental concerns during Phase 1 of the SSMP.” Thus, in reality, only 755 acres of dust control measures had been completed by the SSMP pursuant to WR 2017-0134 by the end of 2021 (the same amount as had been completed by the end of 2020 – i.e., nothing additional was completed in 2021), and zero acres of habitat had been created. Therefore, just 10.79% of the project acreage required to be completed by the end of 2021 was actually done, and none of the required habitat was created. ¹² 4. The SSMP has stated its intent to “catch up” to the acreage requirements in WR 2017-0134 by the end of 2024. ¹³ Yet the acreage the SSMP claims will be completed by 2024 pursuant to this “goal,” as presented in the 2022 SSMP Annual Report, includes the completion of ~4,100 acres constituting the SCH. ¹⁴ Again, that is improper because the acreage requirements specified in WR 2017-0134 explicitly exclude the SCH. This means that by the end of 2024, in order to comply with WR 2017-0134, the SSMP needs to complete ~4,100 additional acres (most of which need to be habitat) beyond the very large amount of habitat and dust control acreage it has a “goal” of creating by then.	Comment noted. The overall SSMP is behind in meeting the WR 2017-0134 target. WR 2017-0134 states that if annual milestones are not achieved or exceeded in any given year, the amount of shortfall or excess in the year will carry over to the following year. The State included the SCH Project (permitted separately) in the alternatives analyzed in the EA to show the cumulative projects being undertaken by the SSMP and the total acreage by alternative even though SCH Project was analyzed in separate environmental analysis. How the State will meet WR 2017-0134 is outside the scope of the EA and is reported separately. This EA analyzes the alternatives, opportunity areas, activities and projects described in the EA and does not include analysis of the SCH project or evaluate the efficacy of the State to meet the Order.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-5	8/18/2022	Email	Jenny E. Ross	III.A. continued 5. Past performance and current status of SSMP activities in relation to the requirements of WR 2017-0134 make clear that it is extremely unlikely the 10-Year Plan Proposed Project or most of the Alternatives will be completed by 2028 as the Draft EA assumes ¹⁵ and WR 2017-0134 requires. Moreover, in light of the fact that by the end of 2021 the SSMP had accomplished only a very small and inadequate amount of the work mandated by WR 2017-0134 to be done, it is very unlikely that the SSMP will even meet its own goal of catching up by the end of 2024 to the total amount of completed acreage required by WR 2017-0134 to be finished by that date. In fact, in a number of places within the text of the Draft EA, the SSMP admits that construction of the components in the 10-Year Plan Proposed Project will take approximately 10 years after federal permits are obtained, ¹⁶ and on Table 6-1 of the Draft EA the SSMP states in item numbers 50 and 81 that the “anticipated construction window” for the 10-Year Plan Proposed Project is “2023 - 2033.”	Refer to comment response 55-4.
55-6	8/19/2022	Email	Jenny E. Ross	III.B. WR 2017-0134 mandates that the CNRA must “complete” a long-term plan by December 31, 2022. The SSMP should proceed with executing that long-term plan soon thereafter. This matter is highly relevant to the Draft EA because it has important implications for determining which proposed 10-Year Plan components should be implemented. 1. Pursuant to the requirements of WR 2017-0134, the CNRA must select and “complete” a specific long-term restoration plan for the Salton Sea by December 31, 2022. ¹⁷ It is unclear what the word “complete” was intended to mean in this context. However, regardless of the original intent of WR 2017-0134, given the short amount of time remaining and the current status of the SSMP’s long-range planning process, it appears that “complete” will be interpreted by the CNRA as requiring a particular long-range plan concept to be selected, and prepared on paper to some undetermined level of detail.	Comment noted. Refer to comment response 6.
55-7	8/19/2022	Email	Jenny E. Ross	III.B. continued 2. The SSMP is considering two general categories of proposed long-range restoration plans for the Salton Sea: so-called “in-basin” plans that use only the water available as inflows into the central Salton Basin, and ocean water importation plans. a. Proposed in-basin long-range plans will use Colorado River wastewater flowing into the central Salton Basin via rivers and direct agricultural drains to fill large impoundments constructed on the lakebed for habitat and recreation, will implement dust control measures on other portions of the exposed lakebed, and will leave a large brine sink (or multiple brine sinks) incapable of supporting wildlife in the lowest region of the central basin. Such plans suffer from numerous, major flaws that I suggest fundamentally undermine their viability and render them seriously inadvisable. For example: Habitat features and recreational components of such plans use water and previously-sequestered subsurface sediments containing contaminants that could pose serious risks of harm to wildlife and people; the features of such plans are highly likely to emit major quantities of greenhouse gases on an ongoing basis for the foreseeable future; very large impoundments, including ones to be used for recreation, will be built on top of faults and will be vulnerable to collapse in the event of a major earthquake; and the plans will result in exposure of enormous areas of lakebed that are very likely to emit huge quantities of hazardous particulates that will threaten public health and jeopardize the regional economy. Also critically important is the fact that all in-basin plans depend on the continued availability of very large quantities of Colorado River wastewater continuing to flow into the central Salton Basin, which is a requirement that is highly likely to be unfulfilled as the effects of climate warming continue to cripple the over-allocated Colorado River. b. Proposed ocean water importation plans will refill the entire Salton Sea and restore a huge, robust saltwater ecosystem that can support the numbers and diversity of species, including millions of birds and fish, originally sustained by the lake. In addition, such plans will avoid all of the many serious problems afflicting in-basin plans, and they will provide the significant benefits enumerated in item 4 below. Crucially, ocean water importation is the only type of long-range plan that can permanently decouple the fate of the Salton Sea from an uncertain and shrinking Colorado River water supply.	Comment noted. Water importation from outside the Salton Basin is outside the scope of the SSMP 10-Year Plan. Refer to comment response 6.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-8	8/19/2022	Email	Jenny E. Ross	<p>III.B. continued</p> <p>3. An independent review panel (the “Independent Panel”), under contract with the State of California, is currently evaluating the feasibility of proposed long-range plans for ocean water importation to achieve restoration of the Salton Sea. The Independent Panel is expected to issue its final report sometime in September 2022. Based on the initial reports previously issued by the Independent Panel and other information, it appears very likely that the final report will conclude ocean water importation is indeed feasible, and that the report will present at least one possible plan to accomplish Salton Sea restoration by that means.¹⁸</p>	Comment noted. Refer to comment response 6.
55-9	8/19/2022	Email	Jenny E. Ross	<p>III.B. continued</p> <p>4. I strongly recommend that the SSMP select and implement an ocean water importation plan because it is the only option for long-range Salton Sea restoration that will accomplish the following essential goals:</p> <ul style="list-style-type: none">a. It will have a permanent water supply that does not rely on the Colorado River and that will be immune to the future vagaries of climate change and impacts on hydrology from increasing aridification, and will be unaffected by future policy decisions regarding the allocation of Colorado River water and potential recycling and reuse of that water.b. It will fully restore “long-term stable aquatic and shoreline habitat for the historic levels and diversity of fish and wildlife that depend on the Salton Sea,” as required by the Salton Sea Restoration Act.¹⁹ It will therefore avoid serious, even devastating, harm that would otherwise occur to hundreds of resident and migratory bird species – including ones that are already threatened and endangered – and it will avert possible extirpation of an endangered native fish.c. It will eliminate all fugitive dust emissions from exposed lakebed and thereby protect public health from hazardous particulates as required by the Salton Sea Restoration Act.²⁰d. It will minimize or eliminate the very large and ongoing GHG emissions that would result from implementing any of the other types of proposed long-range plans, or from no action, and it will potentially result in significant net carbon sequestration.e. It will avoid constructing crucial project components on top of or adjacent to the many faults located beneath the Salton Sea lakebed. It will therefore not face the significant seismic risks to project integrity and continued viability that would afflict the components of proposed in-basin long-range plans related to shaking, liquefaction, subsidence, and potential major co-seismic slip within the lakebed in the event of a major earthquake.f. It will avoid excavating subsurface lakebed sediments containing hazardous levels of legacy pesticides, including DDT and DDE.g. It will avoid disturbing subsurface lakebed sediments that contain potentially dangerous unexploded ordnance, leaving those hazards safely buried in place for future remediation by the Department of Defense.h. It will avert damage to, and potential loss of, agricultural production in a vital farming area crucial to America’s food supply that could otherwise occur as the result of inadequate fugitive dust mitigation by in-basin plans or lack of mitigation in the no- action alternative.i. It will benefit the climate across the Salton Trough, and potentially beyond, through evaporation and evaporative cooling. The presence of an enormous lake with approximately 2 meters of evaporation from its surface annually will help to mitigate the increased temperatures and aridification anticipated to occur throughout the region in the coming decades because of climate change.j. It will provide extensive, high-quality, permanent recreational opportunities for both residents and visitors all around the perimeter of the Salton Sea in numerous communities, including many disadvantaged ones.k. It will support a vigorous regional economy for the long term, rather than jeopardizing it as an inadequate in-basin long-range plan or a no-action alternative would.	Comment noted. Refer to comment response 6.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-10	8/19/2022	Email	Jenny E. Ross	<p>III.B. continued</p> <p>5. Based on the information provided in proposals for ocean water importation plans submitted to the Independent Panel, it seems reasonable to assume that it may take a total of 10 years for such a long-range plan to be fully developed and implemented to operational status.</p> <p>6. Assuming that the CNRA does select and “complete” a specific long-range restoration plan for the Salton Sea by December 31, 2022 in compliance with WR 2017-0134, soon thereafter the SSMP should commence the work necessary to implement that long-range plan in order to achieve full Salton Sea restoration as expeditiously as possible. Given that timetable, and because of the very slow pace at which the SSMP is constructing habitat and dust control measures so far, I suggest that it does not make sense to include in the 10-Year Plan any of the components proposed in the Draft EA that will be particularly time-consuming, complex, and expensive to implement, or features that will create risks or cause problems that can be avoided by implementation of the long-range plan. It also does not make sense to include in the 10-Year Plan any such components that have a primary purpose of creating recreational opportunities, which is not a goal of the 10-Year Plan but is an important aim of the long-range plan.</p>	<p>The SSMP 10-Year Plan assumes that SSMP 10-Year Plan projects remain implemented or provide at least equal economic and ecological benefits once the Long-Range Plan is implemented.</p> <p>Regarding recreational opportunities as part of these project, the purpose of the Proposed SSMP Project is to create projects that provide wildlife habitat and suppress dust (see Section 2.0, Purpose and Need of the EA). Public use activities are included to the extent they are compatible with the purpose and need of the Proposed Project, and may include picnicking, hiking, birdwatching, non-powered watercraft use, and hunting. The State’s Long-Range Plan addresses recreational opportunities at the Sea. The Long-Range Plan is cited as CNRA et al. 2024, released on March 15, 2024.</p>
55-11	8/19/2022	Email	Jenny E. Ross	<p>III.C</p> <p>C. In light of the discussion in sections II, III.A, and III.B above, the SSMP should scale back the components included in the 10-Year Plan, and focus only on the proposed features that specifically target and effectively address the most urgent needs for habitat creation and dust suppression, that can be implemented quickly and effectively at a reasonable cost, and that will not interfere with or delay the implementation of the long-range plan. In addition, in designing and executing the 10-Year Plan as an interim plan to be in place only until the long-range plan is implemented, the SSMP should: (1) omit or modify measures posing potentially significant but largely avoidable risks to wildlife and to public health and safety; (2) limit the destruction of established vegetation and existing wetlands to the greatest feasible extent; (3) forego or modify measures that will substantially increase the emission of greenhouse gases; and (4) defer costly and problematic components that are primarily targeted at providing water-based recreation. These issues are discussed in greater detail below.</p>	<p>Regarding urgent needs for habitat creation and dust suppression, the EA Proposed Project and Alternatives (described in Chapter 3 of the EA) were selected to address the most urgent needs at the Salton Sea.</p> <p>Regarding efficiently implementing projects, this EA allows for projects that can be implemented more quickly and ones that will take more time to plan and develop. It is an umbrella document to cover a variety of project types to allow efficiency in implementation of the entire program and resultant cost savings.</p> <p>Regarding the 10-Year Plan being an interim plan, the SSMP assumes that any constructed SSMP 10-Year Plan projects will remain in place or continue to provide economic and ecological benefits regardless of any subsequent planning or a project proposed under the Long-Range Plan is implemented.</p>
55-12	8/19/2022	Email	Jenny E. Ross	<p>IV. Hydrological Modeling and Projections of Water Availability</p> <p>The Draft EA utilizes faulty hydrological modeling and incorrect projections regarding future water availability, and therefore relies on the unwarranted conclusion that the amount of water required for the 10-Year Plan, as currently designed, will certainly be available throughout the operational life of the plan. The modeling flaws have important implications both for the selection of 10-Year Plan components to be implemented, and for the relationship between the 10-Year Plan and the long-range plan.</p> <p>A. Use of Faulty Hydrological Modeling</p> <p>Appendix F to the Draft EA describes the hydrological modeling used in support of the Draft EA (the “Hydrological Modeling”) concerning “Salton Sea elevation and salinity under the SSMP ‘proposed project’ scenario, 5 alternative scenarios, and one ‘no action’ scenario, as well as the water demands from the Salton Sea and river water associated with individual projects.”²¹ In addition, the results of the Hydrological Modeling determine the amount of lakebed that will be exposed during the life of the plan, potentially emitting very large quantities of hazardous dust.</p> <p>The Hydrological Modeling suffers from various major, fundamental flaws. Therefore, I suggest that the results of the modeling should be presumed inaccurate, and any conclusions drawn in the Draft EA based upon those results should be considered unwarranted. Specifically, for at least the following reasons,²² it should be assumed that the Hydrological Modeling overestimates the amount of future inflow to the central Salton Basin that will be available in both the near future and the longer term for habitat restoration and dust mitigation, underestimates the amounts of water required to support the 10-Year Plan Proposed Project and the Alternatives (other than the “No Federal Action” and “No Action” alternatives) as well as the SCH project, and underestimates the amount of lakebed that will be exposed.</p>	<p>Refer to updated Appendix C (was Appendix F in Draft EA), which has been revised in the Final EA to include additional modeling results and to present the water demand by individual project component and alternative. The analysis is made for three different total inflow scenarios developed for the Long-Range Plan (most probable, low probability, and very low probability) with a wide range of policy assumptions and considering climate change. The range of flows scenarios considers near term droughts, climate change, other water demands such as for lithium mining, and results in future flows of 889, 684, and 444 thousand acre-feet, which may be compared with the current flows of 1,100 thousand acre-feet. The modeling framework has been widely used for the Salton Sea over more than two decades (Salton Sea Accounting Model) and has been calibrated to observed data on elevation and salinity and is considered credible for this application.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-13	8/19/2022	Email	Jenny E. Ross	IV.A continued 1. It is unclear whether the Hydrological Modeling has been properly validated for the particular manner in which it is being used to support the Draft EA. Because no relevant, up-to-date validation analysis has been cited, it appears that no such analysis has been done. Utilizing a model and modeling technique that have not undergone proper validation both in general and related to the specific location and purposes for which they are used could yield inaccurate and misleading information about how hydrologic conditions are likely to change over time as a result of anthropogenic climate change and many other factors. Consequently, such inaccurate information could yield errors in the determination of future inflows to the central Salton Basin, water demands by the 10-Year Plan's components, and amounts of exposed lakebed under different scenarios.	Refer to updated Appendix C (was Appendix F in Draft EA), which has been revised in the Final EA to include additional modeling results and to present the water demand by individual project component and alternative. The State, in its separate action to prepare a Long-Range Plan, evaluated Hydrology and Climate Change and described its modeling framework on Salton Sea Salinity and Elevation Modeling. The Long-Range Plan is cited as CNRA et al. 2024, with the Final Plan released in April 2024.
55-14	8/19/2022	Email	Jenny E. Ross	IV.A continued 2. The Hydrological Modeling ²³ relies on obsolete climate models developed more than 15 years ago that have been repeatedly superseded since then. It therefore should be assumed that the Hydrological Modeling does not adequately account for the effects of climate change on future aridification of the Salton Trough, and therefore incorrectly projects future inflows, water demands by project components, and amounts of exposed lakebed for that reason alone.	Refer to comment response 55-13.
55-15	8/19/2022	Email	Jenny E. Ross	IV.A continued 3. It also appears that the Hydrological Modeling either fails to account for recent and foreseeable future changes in Colorado River Basin hydrology, or it is based at least in part on inaccurate models of changing Colorado River Basin hydrology. Furthermore, the Hydrological Modeling makes unwarranted assumptions concerning future availability of Colorado River water for consumptive use, and fails to account for imminent and future declines in the allocations of Colorado	Refer to comment response 55-13.
55-16	8/19/2022	Email	Jenny E. Ross	IV.A continued 4. The Hydrological Modeling does not appear to take into consideration the extent to which future curtailment of irrigated agriculture in the Imperial, Coachella, and Mexicali Valleys and major shrinkage of the Salton Sea are factors that themselves will negatively affect Salton Trough climate and hydrology, and possibly Colorado River Basin climate and hydrology as well. ²⁴ There is reason to think a detrimental positive feedback effect could result, yielding even hotter and drier climate conditions, further decreases in water availability and inflows to the central Salton Basin, and additional shrinkage of the Salton Sea. In fact, such changes may already be underway to some extent because of reductions in water usage for irrigated agriculture and decline of the Salton Sea that have already occurred during the past two decades.	Refer to comment response 55-13.
55-17	8/19/2022	Email	Jenny E. Ross	IV.A continued 5. An incorrect acreage for the SCH project is used for the Hydrological Modeling, and consequently Appendix F of the Draft EA understates the amount of water required to operate that project. ²⁵ This means that the total quantity of water necessary to operate the 10-Year Plan plus the SCH is also underestimated. In addition, the amount of residual exposed lakebed may consequently be underestimated for the same reason (as well as for the other reasons noted above).	Refer to comment response 55-13.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-18	8/19/2022	Email	Jenny E. Ross	IV continued B. Unreasonably Optimistic Projections of Future Inflows As shown in Table JER-1 (which summarizes data presented in Appendix F to the Draft EA and is appended as Attachment 2), the 10-Year Plan Proposed Project and most of the Alternatives, in combination with the SCH project that is expected to be operational beginning in 2023, require continued annual inflow of several hundred thousand acre-feet of Colorado River wastewater into the central Salton Basin throughout the life of those projects. But the total amount of water that will actually be available is decreasing and uncertain. In light of the ongoing Colorado River water crisis, the worsening effects of climate change on hydrology in both the Salton Trough and the rest of the Colorado River Basin, and the urgent need for Colorado River water users to cut back significantly on their use of the river's water, the very large quantities of inflow to the central Salton Basin that are required for the 10-Year Plan as currently designed (plus the operation of the SCH) should not be considered guaranteed for the life of the project.	Refer to comment response 55-13.
55-19	8/19/2022	Email	Jenny E. Ross	IV.B continued 1. The Colorado River's water has been over-allocated for many years, and now the chronic and severe supply-demand imbalance on the river has become an acute water-supply emergency. Water levels in the river's two largest reservoirs, Lakes Mead and Powell, have already plummeted to the point that power generation at the associated dams is threatened. Moreover, if appropriate remedial actions are not undertaken quickly, the extreme water shortage will imperil the engineered system's ability to move water downstream of Lake Mead to millions of people in California, Arizona, and northwest Mexico who depend on that supply.	Comment noted.
55-20	8/19/2022	Email	Jenny E. Ross	IV.B continued 2. There is an urgent need for all stakeholders reliant on the Colorado River to reduce their use of the river's water significantly, both in the short term and in the future. On June 14, 2022 the Commissioner of the Bureau of Reclamation announced that Colorado River water users must collectively cut a staggering total of two million to four million acre-feet of river water from the amounts they currently use annually, beginning in 2023, or the federal government will step in and make the cuts for them in whatever manner is deemed necessary to protect the system that stores and delivers the river's water to more than 40 million people. Further reductions in water usage are projected to be necessary in the future as climate warming continues to cause worsening aridity across the Colorado River Basin; however, the amounts of additional future cuts are currently unknown.	Comment noted.
55-21	8/19/2022	Email	Jenny E. Ross	IV.B continued 3. In the near term and the future, reductions in the allocation of Colorado River water to the Imperial Irrigation District (IID), the Coachella Valley Water District (CVWD), and Mexico will collectively cause large decreases in the amount of water flowing into the central Salton Basin, and will result in large declines in the quantities of water available for the SCH, the 10-Year Plan, and the subsequent long-range plan. Nearly all of the inflow to the central Salton Basin is wastewater resulting from the use of Colorado River water by those entities. The cutback amounts for 2023 are currently being negotiated; however, it appears likely that the reductions will be large enough to cause the amount of inflow to the central Salton Basin to decrease by at least 170,000 acre-feet. (See, e.g., Attachment 3, a Salton Sea Authority memorandum, which discusses possible reductions in inflow related to potential cutbacks in Colorado River water use in the Imperial and Coachella Valleys, but does not consider additional possible curtailment of water usage by Mexico that would reduce inflows to the central Salton Basin even more.) ²⁶ In light of the worsening hydrology across the Colorado River Basin, it should be expected that additional significant reductions in allocations of the river's water, and therefore reductions of inflows to the central Salton Basin, will occur both in 2023 and in subsequent years.	Potential reductions in inflow quantities, including reductions based on the current drought, have been considered in modeling. Refer to revised Appendix C in this EA (formerly Appendix F in Draft EA) and Figure C-1 (Inflow Scenarios Developed as Part of the LRP). The State described its flow projections in greater detail in its Long-Range Plan, cited as CNRA et al. 2024, and released in April 2024.

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55-22	8/19/2022	Email	Jenny E. Ross	IV.B continued 4. It is clear that the total modeled inflow amounts presented in Appendix F for 2023-2046 based on a “No Action” scenario ²⁷ are major overestimates and do not reflect the reality of significantly decreasing Colorado River water availability. Because of expected imminent cutbacks in the use of Colorado River water by stakeholders in the Salton Trough, even the modeled inflow amount for 2023 will be a significant overestimate.	Refer to comment response 55-21.
55-23	8/19/2022	Email	Jenny E. Ross	IV.B continued 5. Because the modeled inflow amounts greatly overestimate the amount of water that will actually be available in the central Salton Basin in the future, the modeled amounts of exposed lakebed associated with the 10-Year Plan are significant underestimates. For example, the Salton Sea Authority memorandum appended as Attachment 3 suggests a potential scenario resulting from cutbacks in the allocation of Colorado River water to IID and CVWD during 2023 that could result in a total of 61,667 acres of lakebed becoming exposed. Greater reductions in future inflows after 2023 would increase the amount of exposed lakebed even more.	Refer to Appendix C (formerly Appendix F in Draft EA), which has been revised in this EA to include additional modeling results and to present the water demand by individual project component and alternative. This includes consideration of the current drought-related water allocation reductions to IID and CVWD. Also, refer to comment response 55-21.
55-24	8/19/2022	Email	Jenny E. Ross	IV continued C. Likelihood of Wastewater Recycling and Reuse in the Future In light of the ongoing Colorado River water crisis and the need for all river stakeholders to reduce their use of the river’s water significantly both in the near future and in the long term, it now appears possible that wastewater recycling and reuse will increase and cause the amount of water flowing into the central Salton Basin during the life of the 10-Year Plan to be even more significantly curtailed. The modeling employed by the SSMP appears to incorporate to some extent the possibility of decreased future wastewater flows into the central Salton Basin; however, in light of the unduly optimistic inflow projections for the “No Action” scenario, ²⁸ it appears that the modeling utilizes insufficiently pessimistic parameters concerning potential reductions of future wastewater inflows related to water recycling and reuse, in addition to making various other questionable assumptions. One indication of the potential value of the Salton Basin’s Colorado River wastewater for purposes of recycling and reuse is the fact that the Metropolitan Water District of Southern California (MWD) previously submitted a water right application to divert agricultural return flows from the New and Alamo rivers. ²⁹ MWD’s New River water right application seeks to divert 700 cfs up to a maximum water volume of 433,400 acre-feet per year. The agency’s Alamo River water right application seeks to divert 800 cfs up to a maximum water volume of 475,000 acre-feet annually. No water right permits have been issued to date according to the SWRCB eWRIMS database. ³⁰ It appears that MWD has not prepared the required environmental documentation, and the SWRCB has therefore not acted upon the applications. Because the return flows in the Alamo and New Rivers derive primarily from the application of Colorado River water to irrigated lands within IID’s service area, it appears certain that if these MWD applications do proceed in the future they will be contested by IID. At any rate, this issue strongly indicates that recycling and reuse of the Salton Basin’s Colorado River wastewater is likely to occur in the future.	The flow scenarios considered in revised Appendix C (was Appendix F in Draft EA) in this EA include assumptions for flows in the Whitewater which involve planning decisions with water recycling in Coachella Valley. Also, refer to comment response 55-21.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-25	8/19/2022	Email	Jenny E. Ross	<p>IV continued</p> <p>D. Implications of Modeling Flaws for the 10-Year Plan and Long-Range Plan</p> <p>In light of sections IV.A, B, and C above, it is possible that the amounts of water required for the 10-Year Plan Proposed Project and most of the Alternatives will be partially or completely unavailable during the life of the project. Although the necessary quantities of water may still be available during the next several years while construction is underway, an assumption of full availability in subsequent years is likely unwarranted. By the time many components of the 10- Year Plan can be built, there may not be sufficient water available to operate them.</p> <p>Moreover, given the serious constraints on future water availability, even if the requisite amounts of water are available for operating the 10-Year Plan (which is a speculative and potentially unwarranted assumption), it appears extremely likely that implementation of the 10-Year Plan as currently designed will leave little, if any, remaining water for use by the other components of a long-range plan if the selected long-range plan is an in-basin plan.</p> <p>Proposed in-basin long-range plans incorporate the components of the 10-Year Plan either as-is or in a slightly modified form, and add more components to increase the amount of habitat and dust control on portions of the additional lakebed to be exposed over the long term. But if the 10-Year Plan uses most or all the available inflow to the central Salton Basin, there will be little- to-no water available to implement the additional components of an in-basin long-range plan. This situation will result in the exposure of much larger areas of exposed lakebed, and much smaller areas of wildlife habitat, than are currently anticipated. Consequently, the aquatic habitat actually provided by an in-basin long-range plan will be seriously inadequate, the dust control could be gravely deficient, and the recreational benefits will likely be minimal and of low quality if they exist at all.</p>	Refer to Section 3.17 of the Final EA (a new section titled "Project Water Demands, Water Availability, and Water Agreements"), which explains the approach to obtaining water agreements.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-26	8/19/2022	Email	Jenny E. Ross	<p>IV continued</p> <p>E. Incorrect Projections of Exposed Lakebed</p> <p>The components of the 10-Year Plan will be implemented on areas of lakebed that are projected to be exposed by 2028. By covering the exposed lakebed with aquatic habitat and dust control measures, the SSMP anticipates achieving significant benefits for wildlife and avoiding serious public health consequences that would otherwise occur in a no-action scenario. But the amount of lakebed projected to be exposed by 2028, as determined using the Hydrological Modeling and presented in the Draft EA, is much greater than the amount of lakebed to be covered by habitat and dust control measures pursuant to the 10-Year Plan. Moreover, the projected amount of exposed lakebed is likely a significant underestimate, which means that the amount of dust-emitting lakebed not covered by the 10-Year Plan's components will be even larger than anticipated in the Draft EA.</p> <p>Table 3-1 of the Draft EA states that the total amount of lakebed exposed from 2018 through 2028 will be 47,100 acres.³¹ But that amount is in addition to the large areas of lakebed already exposed from 2003 through 2017. Based on the Hydrological Modeling, a grand total of approximately 65,000 acres of lakebed will be exposed by 2028, including the areas exposed from 2003 through 2017.³²</p> <p>Pursuant to the 10-Year Plan Proposed Project as presented in the Draft EA, a total of 33,962 acres of habitat, dust control, and recreational components will be constructed by 2028.³³ The SCH and Red Hill Bay projects add a total of 4700 acres.³⁴ Thus, assuming the Proposed Project is actually fully constructed by 2028, this means that a grand total of 38,662 acres of lakebed will be covered by all projects then. However, according to the Hydrological Modeling, about 65,000 acres of lakebed will be exposed by 2028. This means that a minimum of 26,338 acres of lakebed will be exposed by 2028 but not covered by project features, and therefore will potentially be emitting large quantities of hazardous dust.</p> <p>Moreover, as noted above in section IV.B.5, the actual amount of lakebed exposed by 2028 will be even greater than the modeled amount of ~65,000 acres, because the Hydrological Modeling is faulty, and because it also does not account for decreases in inflows that will occur from 2023 through 2028 and beyond as a result of the declining supply of Colorado River water. Although the specific additional amounts of exposed lakebed attributable to these factors are currently Hill Bay Project is 590 acres. (Although the habitat project originally planned for Red Hill Bay was never constructed, dust control measures have been used on the exposed lakebed in that area.) uncertain, they are likely to be very large. Therefore the amount of dust-emitting exposed lakebed not covered by the Proposed Project, the SCH, and dust control measures in place at Red Hill Bay is likely to be far more vast than anticipated in the Draft EA.</p>	Projections of Sea elevation and thus exposed lakebed are based on revised inflow estimates and presented in the revised Appendix C (was Appendix F of Draft EA) in this EA.
55-27	8/19/2022	Email	Jenny E. Ross	<p>V. Use of a 75-Year Project Life for the Cost-Benefit Analysis</p> <p>An economic analysis of the 10-Year Plan performed in support of the Environmental Assessment and set forth in Appendix B of the Draft EA³⁵ analyzes costs and benefits of implementing the plan, and concludes that there will be \$390 million in net benefits. However, the economic analysis uses a 75-year project life for the 10-Year Plan, which I suggest is inappropriate and serves to inflate the plan's benefits enormously.</p>	The economic analysis included in the Draft EA was a required component of the Watershed Plan related to NRCS. Any project funded by NRCS will be subject to supplemental analysis specific to each project. Refer to comment response 53.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-28	8/19/2022	Email	Jenny E. Ross	<p>V continued</p> <p>A. Background Concerning the Economic Analysis</p> <p>Appendix B of the Draft EA sets forth an analysis (the “Economic Analysis”) supporting the conclusion that the 10-Year Plan is economically justified because its total calculated benefits exceed its total calculated costs across the operational life of the plan. The Draft EA explains that Appendix B “is a Watershed Plan supporting the Environmental Assessment (EA) prepared pursuant to the National Environmental Policy Act (NEPA) that analyzes and discloses the effects of the proposed implementation of the Salton Sea Management Program’s (SSMP’s) Phase 1: 10- Year Plan (SSMP 10-Year Plan).”³⁶</p> <p>Appendix B states that the 10-Year Plan, as presented in the Draft EA, was “selected to maximize net economic benefits as quantified and monetized at the national level.”³⁷ It further explains that in order to reach the conclusion that the 10-Year Plan does in fact maximize net benefits, “An economic analysis was completed for the Watershed Plan, which identifies the costs and benefits associated with implementation of the SSMP 10-Year Plan relative to the No Action Alternative.”³⁸</p> <p>The Economic Analysis, which is presented in Attachment B.2 to Appendix B of the Draft EA, identifies three “potential social cost components” and four “potential benefits streams” that are “associated with implementation of the 10-Year Plan” and were evaluated.³⁹ It explains that “the final configuration of the SSMP 10-Year Plan is considered to be economically justified so long as the social benefit of the design detailed in the Draft EA exceeds the social cost of the cost associated with its implementation.”⁴⁰ The Economic Analysis concluded that the 10-Year Plan is indeed economically justified because the expected net benefit to be achieved by its implementation is approximately \$390 million (in 2021 U.S. dollars), based on total expected benefits of \$2.14 billion and total expected costs of \$1.74 billion.⁴¹</p> <p>In explaining the methodology employed for the Economic Analysis, Appendix B states, “The underlying analyses were conducted in a manner consistent with the Guidance for Conducting Analyses under the Principles, Requirements, and Guidelines for Water and Land Related Resources Implementation Studies and Federal Water Resource Investments DM 9500-013. Throughout, it is assumed that planning, design, and construction would be completed by 2028 and that operations and maintenance would continue through 2077.”⁴² Regarding the “Treatment of Time,” the Economic Analysis states, “When calculating social costs and social benefits... [t]he period of analysis extends 75 years past the start of the Quantification Settlement Agreement, which was 2003. Therefore, the analysis runs until the end of 2077.”⁴³ Appendix B also states, “Installation costs are amortized over the 75-year useful life of the Project.”⁴⁴ Concerning project benefits, Appendix B explains, “Note that Project benefits are associated with the entire Project as a whole.”⁴⁵</p>	Comment noted. Refer to comment response 55-27.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-29	8/19/2022	Email	Jenny E. Ross	<p>V.B. continued</p> <p>B. Defects in the Economic Analysis</p> <p>The Economic Analysis uses a 75-year project life for the 10-Year Plan that begins in 2003 when the QSA was entered. Benefits are calculated for the entire 75-year project life through the end of 2077, and costs are amortized for that period. No justification is provided for using a project life beginning in 2003 and continuing through the end of 2077 for the Economic Analysis. It appears that both the start date and the length of the project life are unsupported by the requirements of DM9500-013, and they are also unjustified by the facts. The lengthy project life results in gross inflation of purported benefits accruing from implementation and operation of the 10-Year Plan as designed.</p> <p>1. DM 9500-013, the guidance document relied upon for determining the methodology used in the Economic Analysis, does not require a 75-year project life to be used.46 Appendix B states, “DM 9500-013 requires the period of analysis to be the time required for implementation of the investment (in this case 10 years) plus the lesser of (1) the period of time over which any alternative [of the 10-Year Plan] would have meaningful beneficial or adverse effects; or (2) a period not to exceed 100 years.” The SSMP concluded, without offering justification, that the period over which the 10-Year Plan “would have meaningful beneficial or adverse effects” is 65 years beyond the 10 years required for implementation of the plan. But based on what is currently known, it cannot be justifiably claimed that the 10- Year Plan will “have meaningful beneficial or adverse effects” through 2077.</p> <p>2. In addition, no justification is provided for using 2003 as the start date for the 10-Year Plan. To begin the project life in 2003 does not make sense. As noted in Part II above, the first draft “Salton Sea Management Program Phase 1:10 Year Plan” was issued in March 2017. Therefore, I suggest that the earliest appropriate timing for the start of the 10-Year Plan for purposes of the Economic Analysis would have been 2017.</p>	Comment noted. The SSMP 10-Year Plan projects are being developed to meet the targets defined in the SWRCB WR 2017-0134. Refer to comment responses 53, 55-26.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-30	8/19/2022	Email	Jenny E. Ross	<p>V.B. continued</p> <p>3. A much shorter project life for the 10-Year Plan should have been selected because of the temporary nature of the 10-Year Plan. If that had been done, the costs of the 10-Year Plan as currently designed would likely outweigh its benefits. Moreover, if the 10-Year Plan were in fact used as a long-range plan through 2077, it would be grossly inadequate and it would be associated with far greater costs than are accounted for in the Economic Analysis.</p> <p>a. The 10-Year Plan is not, and was not intended to be, a long-range plan. Rather, the 10- Year Plan was intended to be an interim plan to provide urgently needed wildlife habitat and dust control on exposed Salton Sea lakebed until design and implementation of a long-range plan for permanent restoration of the Salton Sea could be achieved. The first draft 10-Year Plan issued in March 2017 stated, “This first phase of development has been planned to expedite construction of habitat and to suppress dust on areas of playa that have been or will be exposed at the Salton Sea by 2028.” As set forth in WR 2017- 0134, from its outset the 10-Year Plan was intended to be a rapidly-implemented short- term plan that would be superseded by the long-range plan that the CNRA, through the SSMP, was mandated to “complete...by no later than December 31, 2022.”</p> <p>b. It appears that the reason the alleged benefits of the 10-Year Plan outweigh the costs in the Economic Analysis is because an inappropriately lengthy period of time is used for the accrual of benefits. Even if the operations and maintenance period were cut in half (which is still much too long a time period for an interim plan that is to be operated and maintained only until the implementation of a long-range plan), it appears that the costs of the 10-Year Plan as currently designed would outweigh the benefits.</p> <p>c. The use of a 75-year project life for the 10-Year Plan is particularly problematic if one considers the possibility that an ocean water importation plan may be selected soon and executed as the long-range plan. If that were to occur, most or all features of the 10-Year Plan would be superseded (and likely submerged) when the ocean water importation plan is fully implemented. Based on the estimates in proposed ocean water importation plans for the amount of time required for implementation of such plans, many features of the 10-Year Plan may not be in place for more than a handful of years at the most before they are superseded by operation of the long-range plan.</p> <p>d. It is conceivable that the lengthy project life used for the Economic Analysis may have been based on an assumption by the SSMP that an in-basin long-range plan will be implemented, and that the 10-Year Plan components will simply be incorporated into that plan and therefore operated through 2077. But if that assumption was indeed made, it was unjustified. As noted above, there are many major, fundamental flaws inherent in all of the proposed in-basin long-range plans, and there are very strong arguments against selecting any of them. On the other hand, there are many compelling arguments in favor of implementing an ocean water importation plan for long-term restoration of the Salton Sea. If the SSMP used a very long project life for the 10-Year Plan in the Draft EA’s Economic Analysis because that agency had already made an internal decision that an in- basin long-range plan will be selected and all proposals for ocean water importation will be rejected – despite the fact that at the time the SSMP prepared the Draft EA it had not received the final report and recommendations concerning ocean water importation plans from the Independent Review Panel that is evaluating them – then that was unjustified and improper.</p> <p>e. If we assume that the 10-Year Plan will in fact end up having a project life that extends through 2077 because it becomes the actual long-range plan – for example, as the result of a decision by the SSMP to proceed with an in-basin long-range plan that incorporates the 10-Year Plan, but which cannot be fully implemented beyond the components of the 10-Year Plan because there is insufficient water available in the central Salton Basin to construct any additional features – then: (1) it will fail to satisfy the requirements of the Salton Sea Restoration Act; (2) it will be grossly inadequate to address either habitat needs or dust control necessities; (3) it will very likely cause the emission of extremely large quantities of greenhouse gases on an ongoing basis for the foreseeable future from both exposed lakebed and plan components (see Attachment 4 and section VI below); and (4) the enormous resulting costs will greatly outweigh the limited benefits.</p>	Refer to comment response 55-29.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-31	8/19/2022	Email	Jenny E. Ross	VI. Greenhouse Gas Emissions from 10-Year Plan Components and Exposed Lakebed The Draft EA’s discussion of issues pertaining to greenhouse gas (GHG) emissions from construction, operation, and maintenance of the components of the 10-Year Plan Proposed Project and Alternatives is inadequate, especially in light of the large quantities of GHGs potentially at issue, the seriousness of the topic, and the urgent need for California, the United States, and the world to reduce GHG emissions rapidly and significantly.	<p>The Corps acknowledges the importance of the issue of greenhouse gas emissions and their effects on the environment. Table 4-8 in the Final EA (formerly Table 4-17 in the Draft EA) provides a summary of greenhouse gas regulatory requirements applicable to the project. While the Council on Environmental Quality (CEQ) provides informal guidance to federal agencies in their consideration of the effects of GHG emissions and climate change when evaluating proposed federal actions in accordance with NEPA, there are currently no significance thresholds set forth by a federal agency by which to make a significance determination. The issue is discussed only qualitatively in the EA. Construction activities would result in temporary GHG emissions, and would be minimized by adhering to the following mitigation measures in the EA: MM AQ-1 (Implement Diesel Control Measures to Reduce PM10 and NOx Emissions from Diesel Engines) and MM-AQ-2 (Implement Standard dust suppression activities during ground disturbance and at the end of each workday).</p> <p>In addition, as the exposed lakebed dries, it would generate GHG emissions, but this is not discussed or analyzed because it is not part of the project, instead it is a naturally occurring event. However, implementation of the project would cover some of the exposed lakebed thereby reducing GHG emissions in these areas. Additional analysis of GHG emissions from these sources has been presented in the State’s Long-Range Plan, cited as CNRA et al. 2024, released in April 2024.</p>
55-32	8/19/2022	Email	Jenny E. Ross	VI. Continued Section 5.3 of the Draft EA (“Section 5.3”) addresses greenhouse gas emissions ⁴⁷ from the 10- Year Plan only to a very limited extent. It briefly discusses GHG emissions only from construction activities for the Proposed Project and Alternatives, and states that “operations and maintenance emissions cannot be quantified at this time.” In addition, it appears that Section 5.3 limits its discussion of GHG emissions from construction activities only to point-source emissions caused by the burning of fossil fuels. No other types of GHG emissions resulting from the construction, operation, or maintenance of aquatic habitats or dust control measures in the Proposed Project or Alternatives are discussed in Section 5.3 or elsewhere in the Draft EA. The only pertinent statement is the following one, which is inadequate: “The Proposed Project will likely result in a negligible release of GHG when compared to global GHG. GHG emissions have been shown to contribute to climate change. Aquatic resources, as described in this project, can be sources and or sinks of GHGs. For instance, some aquatic resources sequester carbon dioxide.” ⁴⁸	Refer to comment response 55-31.
55-33	8/19/2022	Email	Jenny E. Ross	VI. Continued Table 5-14 of the Draft EA is labeled “Summary of Effects for Greenhouse Gas” and purportedly relates to GHG emissions resulting from the Proposed Project and Alternatives. However, that table actually does not pertain to GHG emissions; rather, it focuses on fugitive dust, particulate, and NOx emissions. In fact, there is no table in the Draft EA focusing on or summarizing GHG emissions from the Proposed Project and Alternatives, or comparing those GHG emissions to a No Action alternative.	Comment noted. The commenter is correct. Table 5-2 in the Final EA (formerly Table 5-14 in the Draft EA) has been renamed "Summary of Effects to Air Resources" because it does not include GHGs. Sections 4.2.3 and 5.2 of the Final EA address climate change.
55-34	8/19/2022	Email	Jenny E. Ross	VI. Continued As I explained in a peer-reviewed report submitted to the SSMP in January 2022 (appended as Attachment 4), ⁴⁹ it is likely there will be major, ongoing GHG emissions from the types of components included in the 10-Year Plan Proposed Project and Alternatives, and from many of the modifications of the landscape involved in constructing, operating, and maintaining those components, as well as from the large areas of lakebed left exposed by such plans. Although Attachment 4 focuses on GHG emissions from the components of proposed long-range in-basin plans, ⁵⁰ similar or identical components are included in the Draft EA’s Proposed Project and Alternatives. Thus, the discussion in Attachment 4 is as applicable to the proposed 10-Year Plan components as it is to the proposed long-range in-basin plan components.	Refer to comment response 55-31. The Long-Range Plan is outside of the scope of this document and, therefore, outside the scope of this EA.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-35	8/19/2022	Email	Jenny E. Ross	VI. Continued While it is not currently feasible to accurately quantify the GHG emissions to be produced by construction, operation, and maintenance of the aquatic habitat components and dust mitigation measures in the Proposed Project and Alternatives, the relevant scientific literature clearly indicates those GHG emissions are likely to be significant and ongoing. Importantly, they are likely to be larger than the GHG emissions from undisturbed exposed lakebed. (See Attachment 4.) The Draft EA does not discuss any of the pertinent issues, but should. Moreover, there are methods that could be utilized in an effort to mitigate GHG emissions from proposed 10-Year Plan components that are also not discussed in the Draft EA but should be.	Refer to comment response 55-31.
55-36	8/19/2022	Email	Jenny E. Ross	VI. Continued A. Some examples of the activities that are very likely to cause large and ongoing GHG emissions⁵¹ – including emissions of carbon dioxide, methane, and nitrous oxide – are the following: 1. Excavation of subsurface lakebed sediments, stockpiling them on the ground surface, and subsequently moving them again for use as berms, levees, and islands. These actions will expose previously sequestered carbon-rich sediments containing organic material to oxygen and sunlight, and eventually to repeated rewetting or ongoing submersion in shallow water, all of which will stimulate microbial activities in the excavated sediments and cause GHG emissions.	Refer to comment response 55-31.
55-37	8/19/2022	Email	Jenny E. Ross	VI.A Continued 2. Use of agricultural drainwater from the New and Alamo Rivers, which has elevated levels of organic carbon and nutrients, for impounded aquatic habitats of relatively low salinity.	Refer to comment response 55-31.
55-38	8/19/2022	Email	Jenny E. Ross	VI.A Continued 3. Dredging of sedimentation ponds and possibly habitat ponds for maintenance purposes; using dredged sediments for berms, levees, and habitat features that are exposed to the atmosphere; and disposing of any contaminated or poor-quality dredged sediments on the ground surface at a waste disposal site.	Refer to comment response 55-31.
55-39	8/19/2022	Email	Jenny E. Ross	VI.A Continued 4. Draining of habitat ponds, or allowing them to evaporate periodically, thereby exposing previously submerged pond sediments to oxygenation and subsequent rewetting/submersion, which are processes that result in renewed, major pulses of microbial activity and GHG emissions.	Refer to comment response 55-31.
55-40	8/19/2022	Email	Jenny E. Ross	VI.A Continued 5. Employing cycles of flooding and drying of other types of habitat areas, which will cause repeated major pulses of GHG emissions from microbial activities.	Refer to comment response 55-31.
55-41	8/19/2022	Email	Jenny E. Ross	VI.A Continued A. Some examples of the activities that are very likely to cause large and ongoing GHG emissions⁵¹ – including emissions of carbon dioxide, methane, and nitrous oxide – are the following: 6. Vegetation removal from the water conveyance, storage, and supply systems of project components, and disposal of that removed vegetation in a landfill, which will cause the carbon stored in the vegetation to be released as CO ₂ emissions (and potentially methane (CH ₄) emissions from the landfill).	Refer to comment response 55-31.
55-42	8/19/2022	Email	Jenny E. Ross	VI.A Continued 7. Removal of numerous, large, established shrubs and trees, and disposal of that eradicated vegetation in a landfill, which will cause the carbon stored in the vegetation to be released as CO ₂ emissions (and potentially CH ₄ emissions from the landfill).	Refer to comment response 55-31.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-43	8/19/2022	Email	Jenny E. Ross	VI.A Continued 8. Utilizing dust-control techniques likely to emit large quantities of GHGs, such as: <ul style="list-style-type: none">– Intentionally spreading stormwater and other water across large areas of exposed lakebed;– Using deep tillage for surface roughening of exposed lakebed, and repeatedly re- tilling lakebed sediments to restore and maintain the deep furrows created;– Applying water within dust-control furrows to increase dust mitigation, and repeatedly replenishing the water;– Employing shallow flooding within containment berms on exposed lakebed for dust control, and repeatedly replenishing the water;– Applying dust suppressants that draw moisture from the air to keep sediments moist;– Using ongoing irrigation for vegetation planted in exposed lakebed sediments and within dust-control furrows.	Refer to comment response 55-31.
55-44	8/19/2022	Email	Jenny E. Ross	VI. Continued B. There are various construction, operation, and maintenance methods that can and should be employed or avoided in an effort to minimize GHG emissions from exposed lakebed, dust control measures, and habitat projects in the 10-Year Plan. Some examples of such methods are the following: 1. Instead of maintaining constructed aquatic ecosystems at a very low salinity level, increase salinity while creating, to the extent feasible in small impoundments, a robust saltwater ecosystem with multiple trophic levels. Higher salinity is associated with lower GHG emissions, as are ecosystems capable of cycling carbon from the atmosphere to the sediments.	Refer to comment response 55-31.
55-45	8/19/2022	Email	Jenny E. Ross	VI.B Continued 2. Prioritize areas for dust control based on demonstrated particulate emissivity (Draft EA Figure 3-2), prevailing winds, and which emissive areas are most likely to send large amounts of fugitive dust toward populated locations. Leave other areas of exposed lakebed fully intact, avoiding any significant disturbance, digging into the sediments, and/or rewetting. The Draft EA recognizes the desirability of focusing dust control activities on high-priority areas based on the factors just noted, but it does not appear to recognize the importance of leaving the lakebed fully intact and dry in lower-priority areas, whenever possible. Avoiding significant disturbance and/or rewetting of the playa surface is important for minimizing GHG emissions from lakebed sediments.	Refer to comment response 55-31.
55-46	8/19/2022	Email	Jenny E. Ross	VI.B Continued 3. Preferentially utilize dust control techniques that do not entail disturbing the surface of the lakebed, rather than employing surface roughening methods such as deep tillage that destroy the integrity of the lakebed surface, oxygenate previously sequestered sediments, and expose larger surface areas of previously buried sediments to the atmosphere. When feasible and effective, the use of sand fences and engineered surface roughness techniques that involve placing objects on top of the lakebed should be used as dust control measures instead of digging into the lakebed to create surface roughening.	Refer to comment response 55-31.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-47	8/19/2022	Email	Jenny E. Ross	VI.B Continued 4. Avoid dust control methods that use water. Application of water, especially agricultural drainwater and other carbon-rich wastewater, to dry lakebed will significantly increase the net emission of greenhouse gases (including CO ₂ , CH ₄ , and N ₂ O) from the lakebed surface. In particular, rewetting of desiccated lakebed sediments, intentional spreading of water that would otherwise be limited in its movement across the lakebed, and creating shallow flooding within containment berms on exposed lakebed are all measures that are likely to initiate CO ₂ , CH ₄ , and N ₂ O emissions that might not otherwise occur or might not occur in quantities as great. If it is truly essential to use water to control harmful fugitive dust, maintain the water at the greatest depth feasible in a circumscribed area rather than spreading it across larger areas and doing so repeatedly in cycles of drying and re-wetting. In addition, do not furrow or otherwise dig into or disturb the lakebed before applying the water. Whenever possible, limit shallow ponding for dust control to locations where natural processes have caused beach ridges to develop, instead of digging into the lakebed, excavating sediments, and creating berms with the excavated sediments.	Refer to comment response 55-31.
55-48	8/19/2022	Email	Jenny E. Ross	VI.B Continued 5. Avoid the use of chemical dust suppressants that control dust by keeping soil surfaces wet longer and/or draw moisture from the air, because such techniques are likely to increase GHG emissions from lakebed sediments.	Refer to comment response 55-31.
55-49	8/19/2022	Email	Jenny E. Ross	VI.B Continued 6. If surface roughening must be implemented on areas in urgent need of dust control, that technique should not be repeated unless doing so is essential. Also, to decrease the associated GHG emissions, the depth of furrows should be minimized to avoid oxygenating more subsurface sediments than necessary, and water should not be added to furrows because doing so may initiate some GHG emissions that might not otherwise occur without the application of water.	Refer to comment response 55-31.
55-50	8/19/2022	Email	Jenny E. Ross	VI.B Continued 7. Avoid planting vegetation on the exposed lakebed itself, and limit vegetation enhancement for both dust mitigation and habitat creation to areas uphill from or adjacent to the lakebed whenever possible. Specifically, do not plant vegetation in areas within the zones designated on Table 4-19 of the Draft EA as "Barren Lake Bottom" – i.e., areas that support less than 5% vegetative cover and were previously covered by waters of the Salton Sea.	Refer to comment response 55-31.
55-51	8/19/2022	Email	Jenny E. Ross	VI.B Continued 8. The reasons for avoiding planting on the exposed lakebed are: establishing new plants on the lakebed requires digging into lakebed sediments and repeatedly irrigating (both of which activities will increase GHG emissions from lakebed sediments); some of the plants will likely die rather than becoming established (which will cause their stored carbon to be emitted as CO ₂ , or potentially as methane if the dead vegetation is submerged); and all of the plants will eventually die if the planted area is inundated when the long-range plan is implemented (and dead vegetation inundated in shallow water will likely cause significant quantities of GHGs, including methane, to be emitted to the atmosphere).	Refer to comment response 55-31. The State's Long-Range Plan projects are intended to complement the SSMP 10-Year Plan projects, not replace them.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-52	8/19/2022	Email	Jenny E. Ross	VII. Seismic Risks The Salton Trough is one of the most seismically active regions in the world, so there are necessarily some significant seismic risks that the SSMP cannot avoid. However, additional seismic risks that are specifically related to the nature and locations of the proposed components of the 10-Year Plan should be considered and addressed by the SSMP. They are not adequately discussed in the Draft EA.	<p>Generally, NEPA documents look at only seismic risks based on risks to human safety, not necessarily just because an area is seismically-active, as is much of California including the project area. These risks would have a low probability over the life of the project because project features would be constructed in accordance with state and local design criteria to withstand severe seismic events. In addition, the project would not result in the building of residences, offices, or schools (for example) and, therefore, it would pose only a very low risk to human safety.</p> <p>As discussed in Section 4.9.3.3 (Seismic, Existing Conditions) of the Final EA, the only part of the project area within an Alquist-Priolo Zone is a small area of the Bombay Beach wetlands area. No structures are proposed here. Descriptions of geologic hazards associated with seismic activity including specific locations, conditions and/or potential occurrences around the Salton Sea are discussed in Section 4.9.3.4 (Geologic Hazards, Existing Conditions). Section 5.9 (Geology, Soils, Seismic and Minerals, Effects Analysis) has been revised to include mitigation measure MM GEO-1 (Restrict Public Access to Berms and Other Support Structures) that will minimize negative effects of a large-scale seismic event on human safety by restricting public access to berms and other support structures.</p> <p>Note that some section numbers have changed from the Draft EA.</p>
55-53	8/19/2022	Email	Jenny E. Ross	VII. Continued A. Figure 4-9 of the Draft EA does not accurately depict all known faults and fault zones within or adjacent to the Salton Sea footprint that are specified in the USGS Quaternary Fault and Fold Database of the United States and described in relevant scientific literature. Moreover, although the 2010 Fault Activity Map of California is cited as the source for Figure 4-9, the fault data on Figure 4-9 do not match the fault data presented on the cited source map. It appears that Figure 4-9 may be based on an outdated version of the California Fault Activity Map that does not reflect the current state of knowledge concerning Salton Basin faults and fault zones. In addition, on Figure 4-9 the region where the Brawley Seismic Zone is located is incorrectly identified as the "Sand Hills Seismicity Lineament."	<p>Figure 4-9 in the Draft EA, now Figure 4-12 in this EA has been updated to accurately depict the most recent version of 2010 Fault Activity Map of California by Charles W. Jennings and William A. Bryant. It can be found at: https://maps.conservation.ca.gov/cgs/fam/</p>
55-54	8/19/2022	Email	Jenny E. Ross	VII. Continued B. Many key features of the 10-Year Plan Proposed Project and Alternatives to be constructed on the Salton Sea lakebed would be built on top of or adjacent to the Brawley Seismic Zone, and/or the eastern extension of the Elmore Ranch Fault, and/or the Extra Fault Zone, and/or the Salton Trough Fault, and/or other unnamed but identified faults. (See Attachments 5 and 6.) In addition, other major faults capable of producing very large earthquakes, including but not limited to the southern San Andreas Fault and the Imperial Fault, are nearby.	<p>Proposed locations of the 10-Year Plan projects are covered in the Seismic analysis provided in Section 4.9.3.3 of the Final EA. Table 4.9.2 notes Salton Sea is located in Seismic Zone 4 and the required structural and seismic design performance objectives. Section 5.9 has been revised to include mitigation measure MM GEO-1 that will minimize negative effects of a large-scale seismic event to human life and safety.</p> <p>Note that some section and table numbers have changed from the Draft EA.</p>
55-55	8/19/2022	Email	Jenny E. Ross	VII. Continued C. Shaking in the event of a major earthquake caused by rupture of a fault, or multiple faults, beneath the Salton Sea lakebed or nearby could cause significant damage to components of the 10-Year Plan constructed on the lakebed. But shaking is not the only seismic or fault-related mechanism that could pose substantial threats. The following potential processes, and the associated damage they could cause, must also be considered by the SSMP: liquefaction, co-seismic slip, subsidence, and aseismic creep.	<p>Geologic hazards are discussed in Section 4.9.3.4 of the Final EA. Section 5.9 has been revised to include mitigation measure MM GEO-1 that will minimize negative effects of a large-scale seismic event to human life and safety.</p> <p>Note that some section numbers have changed from the Draft EA.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-56	8/19/2022	Email	Jenny E. Ross	VII. Continued D. The SSMP should anticipate the possibility that damage from shaking, co-seismic slip, and liquefaction could be so severe in the event of a major earthquake as to incapacitate or destroy large portions – or even the entirety – of berms, levees, water impoundments, ditches, canals, pipes, pumping equipment, and other essential project components on or adjacent to the lakebed. For example, a recent modeling study found that co-seismic slip in the event of a major earthquake could be as large as 6 meters in regions of the Salton Sea footprint where the 10-Year Plan would build key infrastructure on top of the lakebed. ⁵² That amount of co-seismic slip and the associated shaking would also cause widespread liquefaction and would likely result in shearing and/or collapse of berms, levees, and other crucial project components. Complete loss of impounded fresh and low-salinity water from containment structures, and blending of that previously impounded water with extremely hypersaline water in the central portion of the Salton Basin should be considered a realistic possibility. If a major earthquake occurs, rebuilding of the entire project could be necessary. Potentially, such rebuilding might not be feasible.	Likelihood of geologic hazards discussed in Section 4.9.3.4 and project locations located within the Alquist-Priolo fault zone are discussed in Section 4.9.3.3 and reference DOC 2021b. Table 4-23 of the Final EA notes Salton Sea is located in Seismic Zone 4 and the required structural and seismic design performance objectives. Section 5.9 has been revised to include mitigation measure MM GEO-1 that will minimize negative effects on human safety from a large-scale seismic event. Note that some section and table numbers have changed from the Draft EA.
55-57	8/19/2022	Email	Jenny E. Ross	VII. Continued E. It appears that the potential ramifications for public safety related to collapse of 10-Year Plan components in the event of a major earthquake have not been carefully considered by the SSMP because they are not discussed in the Draft EA. Unless the earthquake happens at night, proposed lakes such as the North Lake Demonstration Project, the North Lake Project, and the waterbodies in the “Maximum Lake Edge” and “Maximum Build Out” Alternatives are likely to have many boaters recreating on the impounded waterbodies when the ground motion abruptly commences. If the levees containing these lakes collapse due to major shaking, co-seismic slip, and/or liquefaction, boaters will likely be spilled toward the central basin along with the previously- impounded water. Boaters could end up stranded far from shore on liquefied mud in which they could sink deeply and become trapped. This is a serious hazard that must be considered.	Refer to comment response 55-52. Note that some section numbers have changed from the Draft EA.
55-58	8/19/2022	Email	Jenny E. Ross	VII. Continued F. It is unclear whether the requirements of Sections 16 and 17 of Title 24 in the California Code of Regulations, listed in Table 4-30 of the Draft EA, will be applicable to any components of the 10-Year Plan. However, if those provisions do indeed apply, it appears highly doubtful that any components of the 10-Year Plan constructed on the Salton Sea lakebed will satisfy the following requirement noted in Table 4-30: to “limit damage to structural and nonstructural features without collapse under major level earthquake ground motion.”	As discussed in Section 5.9.2 of the Final EA, features would be constructed in accordance with state and local design criteria to withstand severe seismic events. The only project area within an Alquist-Priolo fault zone is a small area of the Bombay Beach Wetlands area. No structures are proposed there. Note that some section numbers have changed from the Draft EA.
55-59	8/19/2022	Email	Jenny E. Ross	VII. Continued G. Damage to project components constructed on the lakebed, particularly earthen structures, may also occur as a consequence of the small earthquakes that occur frequently, and the moderate earthquakes that occur occasionally, in the Salton Basin. Such damage may also be caused by swarms of small-to-moderate earthquakes like those that have happened repeatedly during the past two decades in the Brawley Seismic Zone. Damage to project components could also result from significant subsidence of the lakebed that may occur in some locations, particularly in the southern half of the Salton Sea footprint, as a result of co-seismic and post-seismic deformation along normal faults. Moreover, some faults beneath the lakebed where project components will be constructed may be subject to aseismic creep. All of the foregoing processes could increase the maintenance requirements for, and the risk of failure of, key structures to be built on the lakebed such as berms and levees.	Registered engineers and/or geologists would develop design criteria consistent with the California Building Code as discussed in Sections 4.9.2 and 5.9 of the Final EA. Refer also to responses to comments 55-52 and 55-58. Note that some section numbers have changed from the Draft EA.
55-60	8/19/2022	Email	Jenny E. Ross	VII. Continued H. In addition to the likelihood of naturally occurring seismicity and other natural fault-related hazards, the SSMP should anticipate the possibility that seismicity and subsidence may be induced as the Salton Sea shrinks rapidly from water-deprivation and because of expanding geothermal development and the anticipated initiation of commercial-scale lithium extraction. The SSMP should consider the potential risk of induced seismicity from hydrologic unloading of faults, as well as possible subsidence because of large-scale sediment compaction as vast areas that were previously submerged beneath the lake become desiccated and the groundwater level drops.	Section 4.9.3.3 of the Final EA states that expansion of geothermal energy production and implementation of commercial-scale lithium production has the potential to increase seismicity in the area. Analysis of impacts associated with geothermal and lithium projects is outside the scope of this EA. As stated in Section 5.9.2 of the Final EA (Effect GEO-1), all project features would be constructed in accordance with state and local design criteria to withstand severe seismic events.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-61	8/19/2022	Email	Jenny E. Ross	<p>VIII. Risks of Other Hazards from Implementation of the 10-Year Plan</p> <p>A. Risks Posed by Unexploded Ordnance</p> <p>Components of the 10-Year Plan Proposed Project and Alternatives would be constructed, operated, and maintained in numerous areas where unexploded ordnance (UXO) could pose safety risks, as shown on Figure 4-11 of the Draft EA. None of the UXO risk areas is expected to be cleaned up by the Department of Defense until after 2028, and most will not be cleaned up until 2038 or significantly later.⁵³ The Draft EA does not discuss what, if any, measures the SSMP will take when designing and implementing the components of the 10-Year Plan in order to minimize or eliminate risks associated with constructing, operating, and maintaining project components in UXO risk areas. This issue should be evaluated by the SSMP and explained to the public.</p>	<p>The EA states that habitat restoration projects would not be undertaken in areas of potential UXO, but dust suppression activities would be. The EA describes this potential hazard in Effect HAZ-1 (Hazardous materials used during construction and operations could be released into the environment). The EA provides a mitigation measure, MM HAZ-2 (Conduct Pre-construction Site Remediation and Provide Worker Training - UXOs) to reduce this impact.</p>
55-62	8/19/2022	Email	Jenny E. Ross	<p>VIII. Continued</p> <p>B. Risks Posed by Legacy Pesticides</p> <p>Salton Sea sediments are contaminated with dichlorodiphenyltrichloroethane (DDT) and its metabolite dichlorodiphenyldichloroethylene (DDE) because of major historical use of DDT as a pesticide across the lake's watershed in both the U.S. and Mexico. Use of DDT in the United States was banned in 1972, but its use continued in Mexico for domestic food production until the 1990s and for malaria control until 2000. DDE is a chemically-similar breakdown product of DDT that forms as a result of microbial activity after the pesticide enters the environment.</p> <p>The Draft EA states, "Dichlorodiphenyltrichloroethane (DDT) and its metabolites were detected in all sediment samples [sampled from within the 10-Year Plan project area], and dichlorodiphenyldichloroethylene (DDE) was the predominant pesticide residue." ⁵⁴</p> <p>As shown on Table 4-49 of the Draft EA, maximum concentrations of DDE in subsurface sediments exceeded the Probable Effects Concentration (the concentration above which harmful effects are likely to be observed) at all but one location where sediment was sampled at and near the New and Alamo Rivers. Although the Whitewater River is impaired with contaminants including DDT, the Draft EA does not provide information concerning the concentrations of DDT or DDE in that river's sediments, delta, or nearby areas. It should be amended to do so.</p>	<p>As required by NEPA, the EA provides an analysis of the Project's potential effects on the environment. Implementation of the aquatic habitat areas would reduce pesticide concentrations in soils, if present, through vegetative uptake. Long-term vegetation management would ultimately remove pesticides from the Salton Sea water column and sediments overtime and result in a stabilization (as the Project has no control of inflow water quality) or potentially decrease in concentrations of water quality constituents of concern.</p> <p>Potential effects of Selenium and DDT are addressed in Effect HAZ-8 (Selenium and DDE levels in ponds could cause increased selenium and DDE levels in sport fish and waterfowl using the ponds) and potential changes in concentration in constructed ponds would be identified and addressed through implementation of MM BIO-2 (selenium monitoring). The commenter's assumption that all soils within the project area are contaminated is erroneous. Refer to Effects GEO-4 (Construction of project features would destabilize emissive soils, potentially generating additional fugitive dust) and HAZ-6 (Project construction could release air and dust-borne disease-causing viruses). With the potential exception of pesticides, no significant areas of documented contamination were found in the study area, and no buildings, other structures, asphalt or concrete-paved surfaces areas would be demolished during Project construction. Soils would be tested for contaminants prior to excavation. Should testing show the presence of contaminated soil, or if such soil was observed either visually or through smell during construction activities, such material would be handled in accordance with DTSC found in Title 22, Division 4.5, Environmental Health Standards for the Management of Hazardous Wastes method and the Imperial CUPA Hazardous Waste Generator and Tiered Permitting Program and the Riverside County Department of Environmental Health Hazardous Materials Branch (i.e., the CUPA for the county). MM HAZ-3 (Provide Worker Training – Airborne-Borne Exposures and Disease) would be implemented, however, to avoid and reduce potential exposure and effects to workers during construction, should soil contamination be encountered. Also, refer to comment responses 35, 41-1, 41-14.</p>
55-63	8/19/2022	Email	Jenny E. Ross	<p>VIII.B. Continued</p> <p>The elevated levels of DDE present in subsurface Salton Sea sediments raise significant environmental and public health concerns that should be addressed in the Draft EA because those sediments may be excavated and used pursuant to the 10-Year Plan, and both wildlife and people may be exposed to harmful substances. When designing, implementing, and maintaining the components of the 10-Year Plan, the SSMP should attempt to avoid excavating and using subsurface sediments that are highly contaminated with DDT and/or DDE.</p>	<p>Refer to comment response 55-62.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-64	8/19/2022	Email	Jenny E. Ross	VIII.B. Continued 1. The threats that DDT and DDE contamination poses to wildlife, especially birds, are serious and have been well-known for many decades. In addition, there are potentially significant risks for people. Although the Draft EA discusses possible risks to human health from consuming Salton Sea fish and birds contaminated with DDE, it does not discuss potential risks related to DDT and/or DDE exposure through dermal contact or as the result of inhalation or ingestion of contaminated particulates. There is little scientific literature on those additional exposure routes, but the SSMP should nonetheless consider this issue because of its potential seriousness. Recent animal and epidemiologic studies indicate that DDT is a human neurodevelopmental toxicant. Moreover, the U.S. Environmental Protection Agency's Integrated Risk Information System has classified DDE as a probable human carcinogen.	Refer to comment response 55-62.
55-65	8/19/2022	Email	Jenny E. Ross	VIII.B. Continued 2. Subsurface sediments within the project area for the 10-Year Plan that are highly contaminated with DDE have become buried over time beneath younger sediments that are much less contaminated or contain no contamination. But hazardous older sediments will probably be excavated during construction and maintenance of the 10-Year Plan components. The contaminated excavated sediments will then likely be used for berms, levees, and islands within habitat impoundments, and potentially for access roads and other purposes. This situation could pose serious risks to wildlife as high levels of DDE in the newly-exposed sediments could enter the food web and bioaccumulate. Excavated sediments containing elevated levels of DDE may also be used to construct islands for bird nesting and loafing, thereby potentially increasing birds' exposure to this hazard.	Refer to comment response 55-62.
55-66	8/19/2022	Email	Jenny E. Ross	VIII.B. Continued 3. The use of contaminated sediments for project components could also expose people to potentially significant health risks. DDE adheres strongly to soil particles and may therefore contaminate fugitive dust in the region and pose an inhalation hazard to both project workers and the public. In addition, if components of the 10-Year Plan will be used for recreation, human exposure to contaminated sediments through inhalation, dermal contact, and ingestion may occur. The excavation and use of currently-buried sediments that are highly contaminated with DDE could therefore add to the serious pollution and public health burdens already unjustly borne by the people in the Salton Sea region.	Refer to comment response 55-62.
55-67	8/19/2022	Email	Jenny E. Ross	IX. Components and Effects of the 10-Year Plan “Proposed Project” The Draft EA indicates that operation of the 10-Year Plan Proposed Project would require a total of 252,279 acre-feet (af) of river water per year, and 25,401 af of Salton Sea water annually. In addition, the completed SCH will require an estimated total of 54,128 af of river water and 8,490 af of Salton Sea water per year. Thus, the total amount of water required for operation of the Proposed Project plus the SCH would be at least 340,298 af annually. ⁵⁵ (See Table JER-1, appended as Attachment 2.) I suggest that this quantity of water should be considered the minimum annual requirement because the amount of water projected to be needed for the SCH is an underestimate, ⁵⁶ and because more water will be needed for operation of the project as the climate continues to become increasingly warm and dry.	Refer to Appendix C (was Appendix F in Draft EA), which has been revised in this Final EA to include additional modeling results and to present the water demand by individual project component and alternative. In Section 5.16.3 in the Final EA, Effect GW-1 (titled “Project implementation would have little effect on groundwater availability or quality”) has been updated for the Proposed Project and alternatives to include more specific information about water demand for each alternative. To ensure that no significant effects would occur, a new mitigation measure, MM GW-1 (Coordinate with Indio Subbasin GSAs regarding groundwater extraction in the Coachella Valley Subbasin), has been added to the Final EA in Section 5.16.3 (Water, Effects Analysis) to require coordination with the Indio Subbasin GSAs so as not to affect subbasin sustainability and compliance with SGMA as part of implementation of the Indio Subbasin Alternative Plan.
55-68	8/19/2022	Email	Jenny E. Ross	IX. Continued I suggest it would be appropriate for a significantly modified version of this project to be implemented as the 10-Year Plan, with aspects of Alternative 4 possibly incorporated into the amended Proposed Project in place of components that I suggest below should be eliminated.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-69	8/19/2022	Email	Jenny E. Ross	<p>IX. Continued</p> <p>A. General Comments on the Proposed Project</p> <p>1. Size of the Proposed Project</p> <p>Pursuant to the 10-Year Plan Proposed Project as currently designed, a total of 33,962 acres of habitat, dust control measures, and recreational components would be constructed on exposed lakebed.⁵⁷ That total acreage figure for the Proposed Project does not include the area of the SCH (4,110 acres),⁵⁸ which is expected to be operational sometime in 2023, or the acreage of Red Hill Bay (590 acres), on which dust control measures have been used because the planned habitat project was not built. If, as I recommend below, the North Lake Demonstration Project and North Lake Project are not included in the 10-Year Plan, the SSMP should consider adding acreage of habitat, such as the aquatic habitat envisioned by Alternative 4, in order to fully satisfy the requirements of WR 2017-0134.</p>	<p>The EA analyzed a wide range of alternatives, as required under NEPA. Many of the projects proposed in the EA are expected to be implemented. Section 3.0 (Proposed Project and Alternatives) of the EA states that after completion of the Final EA, the State will make a decision whether to implement the Proposed Project, an alternative analyzed in the EA, a combination of the Proposed Project and one or more alternatives, or take No Action.</p>
55-70	8/19/2022	Email	Jenny E. Ross	<p>IX.A. Continued</p> <p>2. Effects of the Proposed Project on Biological Resources</p> <p>As explained in Section 5.4 and summarized in Table 5-15 of the Draft EA, the Proposed Project (and Alternatives) would have major negative effects on biological resources, including but not limited to destruction of riparian habitat and bioaccumulation of selenium to levels that may harm wildlife. Although the mitigation measures for these problems discussed in the Draft EA are feasible and should be utilized, it appears that some level of habitat damage and wildlife harm will be unavoidable if the entirety of the Proposed Project is implemented. In light of that fact, and because the 10-Year Plan is intended to be an interim, short-term project, I suggest that the SSMP should reconsider and preferably eliminate particular aspects of the Proposed Project that are associated with a significant risk of direct or indirect harm to wildlife and/or that involve removal of large quantities of established vegetation, especially trees and woody shrubs, and/or that involve destruction of existing wetlands. Removal of established vegetation and destruction of vegetated wetlands should be minimized both in order to limit indirect impacts on wildlife and to limit carbon emissions from dead vegetation that would otherwise not occur if the vegetation were to remain alive and to continue storing carbon. The design and scope of each project component to be considered for implementation should be modified in advance to minimize foreseeable adverse effects on wildlife, and to limit the removal of established vegetation and existing wetlands to the greatest extent possible, while still completing the most crucial project components that will quickly yield significant net benefits during the project's relatively short operational life until the long-range plan is implemented.</p>	<p>As described in Section 5.4 of the Final EA, based on the existing onsite vegetation, effects to native riparian vegetation is not expected to exceed 2 acres, but up to 1,588 acres of tamarisk woodland and scrub (non-native riparian habitat) may be removed. However, MM BIO-1 (Prepare and implement a Habitat Protection, Mitigation, and Restoration Program) would ensure project activities avoid occupied riparian, wetland, and other sensitive habitats, particularly during seasons where local wildlife would be most vulnerable to impacts (i.e., nesting season). Implementation of MM BIO-5 (Prepare and Implement a Program-level Nesting Bird Management Plan), MM BIO-6 (Prepare and Implement a Program-level Special-status Wildlife Species Management and Survey Plan), MM BIO-7 (Conduct noise measurements and implement noise attenuation measures, if needed), and MM BIO-8 (Design interception canals to minimize alteration of water levels in adjacent marshes) would prevent major impacts on common and special-status species. In addition, tamarisk habitat removal would be restored with native plant communities, which is expected to ultimately provide a benefit to native wildlife inhabiting riparian habitat.</p>
55-71	8/19/2022	Email	Jenny E. Ross	<p>IX.A. Continued 3. Effects of the Proposed Project on Farmland</p> <p>According to the Draft EA, implementation of the 10-Year Plan Proposed Project would cause the long-term elimination of a total of 77.5 acres of productive farmland in Imperial and Riverside Counties, including: 6.4 acres of Prime Farmland, 0.1 acres of Unique Farmland, and 34.8 acres of Farmland of Local Importance in Imperial County, and 36.2 acres of Farmland of Local Importance in Riverside County. While the total farmland acreage eliminated from production is not very large in comparison with the total amount of farmland currently existing in these counties, it is nonetheless productive acreage – including Prime Farmland – that would be removed from agricultural use for the long-term. “Prime Farmland” is agricultural land with the best combination of physical and biogeochemical features, including soil quality, to sustain high yields in an economic manner and maintain long-term agricultural productivity. America’s Prime Farmland is a crucial and non-renewable resource, and its unique qualities are vital for support of the U.S. food supply. It is unclear why the Proposed Project must impinge on any productive agricultural lands, and it is concerning that the SSMP feels compelled to remove any Prime Farmland from production. No explanation is provided in the Draft EA. I suggest that the SSMP should revise the boundaries of the Proposed Project in order to minimize or avoid the use of agricultural land, and to ensure that no Prime Farmland or Farmland of Statewide Importance is removed from production.</p>	<p>As described in Section 3.2 (Proposed Project) of the EA, the locations of the aquatic habitat and dust suppression projects under the proposed project are based upon the location and availability of water supply, suitable soils, landscape/ habitat compatibility, and the amount of emissions from the exposed lakebed. Some of the dust suppression projects are water dependent and must be constructed where water sources are available. Potential conversion of this minimal amount of prime farmland under the proposed project is considered a minor long-term effect, and no mitigation measures are required.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-72	8/19/2022	Email	Jenny E. Ross	<p>IX.A. Continued</p> <p>4. Hunting in Habitat Components of the Proposed Project</p> <p>The Draft EA indicates that hunting may be allowed in habitat areas created by the 10-Year Plan Proposed Project. I suggest that hunting would be completely inappropriate. The purpose of creating habitat pursuant to the 10-Year Plan is to conserve the species reliant on the Salton Sea ecosystem. Hunting is fundamentally incompatible with that crucial goal. There are many other locations in the Salton Sea region, both private and public, where hunting is already permitted. There is no need to allow hunting in habitat components of the 10-Year Plan, and doing so would undermine the most important purpose for creating those components.</p>	<p>The SMMP team, consisting of CNRA, DWR, and CDFW, works with other agencies, organizations, and other interested persons to study, protect and preserve listed species, special status species, and their habitats. Additionally, one of the primary purposes of the SSMP is to support the various bird species that use the Pacific Flyway. These bird species include many that are hunted according to the hunting regulations issued annually by CDFW. Supporting legal hunting is, and will remain a part of SSMP's mission and is enjoyed by a large number of Californians. There are many methods, restrictions and policies that can be implemented to allow hunting within certain habitats without impacting protected species. Hunters are known to directly support wildlife conservation in a variety of ways. Thus, it may be possible for hunting to be offered in some habitat areas created by the 10-Year Plan proposed and alternate projects without comprising the habitat value of the created habitat.</p>
55-73	8/19/2022	Email	Jenny E. Ross	<p>IX.A. Continued</p> <p>5. Effects of the Proposed Project on the Long-Range Plan</p> <p>If the 10-Year Plan Proposed Project or a modified version of it is implemented, the SSMP should not use any techniques for dust control or for habitat creation and maintenance that could jeopardize implementation or operation of the long-range plan, or that will require costly remediation or removal if they are inconsistent with, or create problems for, the long-range plan. Techniques that may be problematic include the application of gravel to cover the surface of the lakebed in an attempt to control dust, the use of riprap on the lakebed and/or for structural support of berms or levees, and the application of water-insoluble or water-resistant soil binders that harden the surface of the lakebed. It may be necessary or desirable later to submerge areas that have been subjected to the use of such techniques when the long-range plan is implemented, and significant problems may result. Gravel-covered lakebed surfaces could be problematic in the future for both the restored Salton Sea ecosystem and for recreation; riprap could pose outright dangers for various potential future recreational uses of the restored Salton Sea; and a hardened lakebed that is water-insoluble and chemically-stable would be an ecologically problematic and improper substrate for the future restored Salton Sea or a future wetland.</p>	<p>The SSMP 10-Year Plan projects are being developed to meet the targets defined in the SWRCB WR 2017-0134. Refer to response comment 55-3.</p>
55-74	8/19/2022	Email	Jenny E. Ross	<p>IX. Continued</p> <p>B. Comments on Specific Components of the Proposed Project</p> <p>1. North Lake Demonstration Project – 160 acres; 1,900 to 2,650 af/year</p> <p>Although this project is characterized in the Draft EA as an “Aquatic Habitat Restoration Project Component,” it appears highly likely it will serve primarily as a recreational lake. In fact, the Riverside County website describing the North Lake Demonstration Project⁵⁹ makes clear that providing opportunities for recreation is the main goal of the project. The Draft EA indicates that the two goals of creating the North Lake Demonstration Project are to offer recreational opportunities for residents of the adjacent area and to provide habitat benefits. I suggest that while the project may achieve the recreational goal, it is quite unlikely to achieve the habitat goal. Because providing recreational opportunities is not a specific aim of the 10-Year Plan, and in light of the additional issues discussed below, I suggest that the North Lake Demonstration Project should not be part of the 10-Year Plan. Instead, the provision of high-quality recreational opportunities should be an important focus of the long-range plan, and the SSMP should prioritize developing and implementing the long-range plan as quickly as possible.</p>	<p>Just as it is true that a public lake that is open to recreation will be an attractant to human visitors, it is simultaneously true that the presence of potential abundant prey, in the form of fish and other aquatic species, will also be a powerful attractant to piscivorous bird species as well as other guilds of species. Many bird species are known to readily acclimate to varying levels of disturbance as a “trade off” for high prey availability and other factors that are beneficial to bird species. Although not all bird species in the area would utilize the proposed North Lake Demonstration Project, there is considerable variability in the sensitivity of various bird species to disturbance. Also, it is important to note that because the use of motorized vehicles will be prohibited, disturbance will be minimized in comparison to some other public lakes. Additionally, at this proposed site, habitat is not intended to provide a core reproductive habitat area for the birds that the studies of the cited report are discussing. As additional proposed projects are developed, these nearby projects are intended to be designed to address other life history requirements (e.g., nesting/roosting structures) of Salton Sea bird species. Thus, it is possible to have a lake that will provide foraging and/or stopover habitat for the birds of the Pacific Flyway and still be utilized for recreation.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-75	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 1. North Lake Demonstration Project – 160 acres; 1,900 to 2,650 af/year a. As explained in section II above, the purpose of the 10-Year Plan is to provide urgently-needed habitat and dust control measures. While there would be public benefits from the presence of the North Lake Demonstration Project and other similar projects, assuming a safe water source could be utilized, it is highly questionable whether there would be any noteworthy benefits for the birds that have historically relied on the Salton Sea ecosystem. In light of the relatively small size of this lake (about 160 acres, which is only 0.25 square miles) and the intended use of the lake and its surrounding levees and shore for recreation – including motorized and non- motorized boating according to the Riverside County website, as well as fishing, hiking, and possibly swimming – it is unlikely to be utilized as habitat by many birds. Even if the lake is stocked with fish, as planned, the piscivorous birds that might otherwise utilize that food resource will likely be very disinclined to do so because of the presence of numerous people and boats, and the associated noise and activity level. It would be reasonable to expect high visitation rates at the only public water-based recreation area in the region, and high visitation rates for a small waterbody would tend to be associated with very low or non-existent wildlife usage. As noted in a variety of studies, it is well established that “Human disturbance on wildlife from non- consumptive recreation can result in altered spatiotemporal habitat use (Kangas et al. 2010; Rösner et al. 2014), decreased survival and reproduction (Iverson et al. 2006; Baudains and Lloyd 2007) and, ultimately, decreased population abundance (Miller et al. 1998; Bejder et al. 2006) or extirpation from otherwise suitable habitat (Steven and Castley 2013).” ⁶⁰	Refer to comment response 55-74.
55-76	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 1. North Lake Demonstration Project – 160 acres; 1,900 to 2,650 af/year b. Construction of the North Lake Demonstration Project should be considered a low- priority measure for achieving dust control. Based on Figure 3-2 in the Draft EA, other areas of exposed lakebed are more likely to yield much greater fugitive dust emissions.	Comment noted. The project is being designed to not only suppress dust but to provide habitat.
55-77	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 1. North Lake Demonstration Project – 160 acres; 1,900 to 2,650 af/year c. It appears that the North Lake Demonstration Project will be a freshwater or very low- salinity waterbody. If so, it will have higher net GHG emissions than a more saline waterbody. In addition, the excavation of subsurface lakebed sediments and the use of those sediments for levees impounding the project’s lake, and possibly for other purposes, will cause the ongoing emission of significant quantities of GHGs. The lake’s relatively small size and probable lack of a robust ecosystem with multiple trophic levels are additional factors that are likely to yield high net GHG emissions. (See Attachment 4.)	Refer to comment response 55-31.
55-78	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 1. North Lake Demonstration Project – 160 acres; 1,900 to 2,650 af/year d. It is unclear whether this lake will retain water that would otherwise flow directly into the remnant Salton Sea. If so, retention of water for this lake will likely cause increased exposure of lakebed basinward of this project, as well as increased salinity of the residual Salton Sea. It is unclear whether the modeling done regarding the amount of exposed lakebed and the level of Salton Sea salinity considered this issue.	At the conceptual design level, this project would use water that would flow into the Salton Sea. The modeling presented in Appendix C (formerly Appendix F in Draft EA) includes water loss from such projects, including this demonstration project and other identified habitat projects, in computing the future elevation of the Sea as described in Sections 3.2, 3.17, and Appendix C of the Final EA.
55-79	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 1. North Lake Demonstration Project – 160 acres; 1,900 to 2,650 af/year e. This project appears to be situated on top of or immediately adjacent to the Salton Trough Fault. It is also close to other faults that are within the Salton Sea footprint, and it is very near the southern San Andreas Fault. Consequently, there are major seismic risks associated with this project that potentially threaten both the project itself and the people using the project lake and associated levees. (See section VII above, and Attachments 5 and 6.)	Refer to comment response 55-52.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-80	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 1. North Lake Demonstration Project – 160 acres; 1,900 to 2,650 af/year f. Risks from legacy pesticides may be associated with this project, and they should be avoided or mitigated to the maximum feasible extent if the project is implemented.	Refer to response to comment 55-62.
55-81	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 1. North Lake Demonstration Project – 160 acres; 1,900 to 2,650 af/year g. While the provision of extensive, high-quality, water-based recreational opportunities should be an important goal of the long-range plan, it is not a goal of the 10-Year Plan as explained in section II above. The 10-Year Plan is supposed to consist of urgently-needed habitat and dust suppression measures that are to be put in place on an interim basis until a long-range plan can be implemented. For that reason, as well as the other reasons set forth above – and particularly in light of the slow pace of SSMP activities so far, plus the fact that the CNRA must “complete” a long-term plan by December 31, 2022 – I suggest that construction of the North Lake Demonstration Project should not be part of the 10-Year Plan. If a proposed in-basin plan is selected by the State of California as the long-range plan (which I recommend against), it would be appropriate to proceed with the North Lake Demonstration Project, or a similar project, when that long-range plan is implemented. On the other hand, if an ocean water importation plan is selected as the long-range plan (which I recommend should happen), the North Lake Demonstration Project should be superseded by that long-range plan. An ocean water importation plan would provide permanent recreational opportunities and habitat benefits that would be far superior in every way to those that might be provided by the North Lake Demonstration Project, and would also avoid numerous problems potentially associated with that project.	Some public use activities would be prioritized as part of the SSMP to the extent they are compatible with the purpose and need of the Proposed Project and with the management of the dust suppression areas and aquatic habitat ponds. Such activities, if determined to be compatible, may include picnicking, hiking, birdwatching, non-powered watercraft use, and hunting. The State’s SSMP 10-Year Plan projects are intended to address impacts associated with the QSA and shoreline recession over the 10-year period ending in 2028. Refer to response to comment 6 for water importation.
55-82	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 2. North Lake Project – 3862 acres; 50,000 af/year (40,000 af river water, 10,000 af Sea water). I suggest that the North Lake Project should not be part of the 10-Year Plan for the same reasons that the North Lake Demonstration Project should not be, and for the additional reasons presented below. a. The comments above concerning recreational use of the North Lake Demonstration Project resulting in limited use by wildlife are also applicable to the North Lake Project. While this project would create a larger-scale waterbody than the North Lake Demonstration Project, it is reasonable to expect that the increased size would serve to increase recreational usage. Although the Draft EA states this project would be focused on providing habitat and would only “potentially provide opportunities for public use,” the fact that this lake is intended to extend from the Desert Shores community in the west to the north end of the Salton Sea State Recreation Area in the east clearly indicates that it is intended for recreational use. I suggest this project will in reality be heavily used for recreation unless recreational use is specifically prohibited and the prohibition is enforced. Such a prohibition would likely be politically untenable, and therefore it is unlikely to be implemented. In the absence of such a prohibition, the project will probably have relatively low habitat value for birds.	The purpose of the Proposed Project is to create projects that provide wildlife habitat and suppress dust (see Section 2.0, Purpose and Need). Public use activities are included to the extent they are compatible with the purpose and need of the Proposed Project, and may include picnicking, hiking, birdwatching, non-powered watercraft use, and hunting. Refer also to comment response 55-74.
55-83	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 2. North Lake Project – 3862 acres; 50,000 af/year (40,000 af river water, 10,000 af Sea water). b. The water to be impounded for the North Lake Project is not of high quality and contains contaminants, including but not limited to DDE, that may pose threats to wildlife and to the health of people who use the impounded water for recreation.	Refer to comment response 55-62.
55-84	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 2. North Lake Project – 3862 acres; 50,000 af/year (40,000 af river water, 10,000 af Sea water). c. Retention of river water for the North Lake Project will likely cause increased exposure of Salton Sea lakebed basinward of this project that would not otherwise occur, and would also increase salinity of the already hypersaline remnant Salton Sea. It is unclear whether modeling done regarding the amount of exposed lakebed and the level of Salton Sea salinity considered this issue.	Refer to comment response 55-78.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-85	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 2. North Lake Project – 3862 acres; 50,000 af/year (40,000 af river water, 10,000 af Sea water). d. Construction of the North Lake Project should be considered a low-priority measure for achieving dust control. Based on Figure 3-2 in the Draft EA, other areas of exposed lakebed are more likely to yield much greater fugitive dust emissions. In addition, as noted above, retention of water for this project would likely cause the exposure of more lakebed basinward of the project than would otherwise occur, and would therefore likely increase dust emissions.	Refer to comment response 55-76.
55-86	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 2. North Lake Project – 3862 acres; 50,000 af/year (40,000 af river water, 10,000 af Sea water). e. There are potential risks to public safety and health from unexploded ordnance and legacy pesticides in sediments to be used for constructing this project. Those risks should be avoided or mitigated to the maximum feasible extent if the project is implemented (which I recommend against).	Refer to comment responses 55-61 and 55-62.
55-87	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 2. North Lake Project – 3862 acres; 50,000 af/year (40,000 af river water, 10,000 af Sea water). f. It appears that the North Lake Project will be a low-salinity waterbody. If so, it will have higher net GHG emissions than a more saline waterbody. In addition, the excavation of subsurface lakebed sediments and the use of those sediments for levees impounding the project's lake, and possibly for other purposes, will cause ongoing emissions of significant quantities of GHGs. The lake's high sediment-to-water and edge-to-volume ratios, and its probable lack of a robust ecosystem with a multi-tiered trophic structure, are additional factors that are likely to yield high net GHG emissions. (See Attachment 4.)	Refer to comment response 55-31.
55-88	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 2. North Lake Project – 3862 acres; 50,000 af/year (40,000 af river water, 10,000 af Sea water). g. This project would, in part, be constructed on top of the Salton Trough Fault. It is also very close to other faults within the Salton Sea footprint, as well as to the southern San Andreas Fault. Therefore, there are major seismic risks associated with this project that potentially threaten both the project itself and the people using the project lake and associated levees. (See section VII above, and Attachments 5 and 6.)	Refer to comment response 55-52.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-89	8/19/2022	Email	Jenny E. Ross	<p>IX.B. Continued</p> <p>2. North Lake Project – 3862 acres; 50,000 af/year (40,000 af river water, 10,000 af Sea water).</p> <p>h. A wetland project previously constructed by the Torres Martinez Desert Cahuilla Indian Tribe on a portion of the lakebed area to be used for the proposed North Lake Project was completely destroyed in 2012 by floodwater from the Whitewater River / Coachella Valley Stormwater Channel (CVSWC). Concerning future flood protection for the proposed North Lake Project, the Draft EA states, “An allowance would be made to pass flood flows from the CVSWC into the Sea. Several methods are being investigated that would provide this flood protection.”⁶¹ However, in light of the major flood flows that could threaten the North Lake Project, it appears unlikely that flood protection can be achieved without the addition of major, costly infrastructure.</p>	<p>Sections 4.5.3.4, 5.5.5, 5.16.1, 5.16.5, and 6.17.3 of the Final EA provide information about and evaluate the effects of the projects on flood risk management. Within CVWD’s boundaries there are 16 stormwater protection channels, together known as the Whitewater River / Coachella Valley Stormwater Channel. The entire system includes approximately 135 miles of channels built along the natural alignment of dry creeks that naturally flow from the surrounding mountains into the Whitewater River. Along with the channels, a number of dikes and levees have been designed and built to collect rapidly flowing flood water as it travels from the adjacent mountains onto the valley floor. These are mostly located in the core communities around the Sea.</p> <p>The comment pertains to the adequacy of existing flood protection features to protect the State’s proposed North Lake project if constructed. Per CVWD, the backbone of the stormwater protection system is a 50-mile storm channel that runs from the Whitewater area north of Palm Springs to the Salton Sea. The western half of the channel runs along the natural alignment of the Whitewater River that cuts diagonally across the valley to Point Happy in La Quinta (near Highway 111 and Washington Street). Because the riverbed flattens out naturally in the eastern valley, downstream from Point Happy a man-made storm channel conveys flood waters to the Salton Sea. The channel was built to withstand a standard project flood, or approximately a flow of 80,000 cubic feet per second. Standard project flood means the discharges that may be expected from the most severe combination of meteorologic and hydrologic conditions that are considered reasonably characteristic of the geographical region involved, excluding extremely rare combinations. Since the system is designed to hold a standard project flood, it has flood risk management capacity beyond what would be needed to manage discharges from a low probability flood event. The cost of infrastructure to provide flood protection to the Northlake Project is not part of the analysis in the EA.</p>
55-90	8/19/2022	Email	Jenny E. Ross	<p>IX.B. Continued</p> <p>2. North Lake Project – 3862 acres; 50,000 af/year (40,000 af river water, 10,000 af Sea water).</p> <p>i. While the provision of extensive, high-quality, water-based recreational opportunities should clearly be a key goal of a long-range plan, it is not a goal of the 10-Year Plan, as explained in section II above. For that reason, as well as the other reasons set forth above, construction of the North Lake Project should not be part of the 10-Year Plan. If it turns out that one of the proposed in-basin long-range plans is selected by the State of California as the long-range plan to be implemented (which I recommend against), it would be appropriate to reconsider proceeding with the North Lake Project, or a similar project, as part of that long-range plan. However, if an ocean water importation plan is selected as the long-range plan to be implemented (which I recommend should happen), the proposed North Lake Project would be unnecessary. An ocean water importation plan would provide permanent recreational opportunities and habitat benefits that would be superior in every way to those that might be provided by the North Lake Project, and would also avoid numerous significant problems inherent in or potentially related to the North Lake Project.</p>	<p>Refer to comment response 55-81.</p>
55-91	8/19/2022	Email	Jenny E. Ross	<p>IX.B. continued</p> <p>3. Desert Shores Channel Restoration Project – 30 acres</p> <p>I suggest this project should be retained as part of the 10-Year Plan. Because this small project is located immediately adjacent to homes where the residents have been subjected to very unpleasant and potentially harmful conditions for years as the Salton Sea has receded away from the Desert Shores marina – leaving stagnant, bacteria-filled water and dust- emitting lakebed near residences – this project could provide considerable benefits at a relatively low cost. That will especially be the case if saline groundwater can be utilized to operate the project and avert the need to pump Salton Sea water a considerable distance.</p>	<p>Comment noted.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-92	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 4. New River Expansion Project – Up to 6,850 acres; 83,342 af/year river water. I suggest that a version of the New River Expansion Project, modified as indicated below, should be retained as part of the 10-Year Plan.	Comment noted. See individual responses below.
55-93	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 4. New River Expansion Project – Up to 6,850 acres; 83,342 af/year river water. a. It appears that the ponds created for this project will be relatively low-salinity waterbodies. If so, they will have higher net GHG emissions than more saline waterbodies. In addition, the excavation of subsurface lakebed sediments and the use of those sediments for levees impounding the project's ponds, and for other purposes, will cause ongoing emissions of significant quantities of GHGs. The high sediment-to-water and edge-to-volume ratios of ponds, and the possible lack of a robust ecosystem with a multi-tiered trophic structure, are additional factors that are likely to yield high net GHG emissions. (See Attachment 4.) The SSMP should modify the project to mitigate these problems and minimize GHG emissions to the greatest feasible extent.	The EA acknowledges the increase in emissions during construction. However, the resulting projects will result in more vegetation and more water covering the land surface, which would reduce emissivity in the area. Refer to comment response 55-31.
55-94	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 4. New River Expansion Project – Up to 6,850 acres; 83,342 af/year river water. b. Significant seismic risks are associated with this project. It will be constructed close to the Brawley Seismic Zone and other faults located beneath the Salton Sea lakebed, and near the Imperial Fault and southern San Andreas Fault. Because of its location this project would also be vulnerable to possible induced seismicity and subsidence related to expansion of geothermal energy production and implementation of commercial-scale lithium production. Nonetheless, seismic risks to public safety could be minimized by not allowing public access onto any vulnerable berms, levees, or other structures used to support large water impoundments, if any are created pursuant to this interim project.	Refer to comment response 55-52.
55-95	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 4. New River Expansion Project – Up to 6,850 acres; 83,342 af/year river water. c. Risks from both unexploded ordnance and legacy pesticides are associated with this project, as are risks related to the bioaccumulation of selenium. All these risks should be avoided or mitigated to the maximum possible extent.	Refer to comment responses 55-61 and 55-62.
55-96	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 4. New River Expansion Project – Up to 6,850 acres; 83,342 af/year river water. d. Retention of river water for this project's ponds may cause increased exposure of lakebed basinward of the project, as well as increased salinity of the remnant Salton Sea. It is unclear whether the modeling done regarding the amount of exposed lakebed and the level of Salton Sea salinity considered this issue.	Refer to comment response 55-78.
55-97	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 4. New River Expansion Project – Up to 6,850 acres; 83,342 af/year river water. e. The design of this project should be adjusted in light of the fact that it is an interim, short-term project to be used until a long-range plan is implemented. Its characteristics should be only as ambitious as necessary to provide the most urgently-needed habitat and dust control in a manner that is as efficient and inexpensive as possible.	Comment noted. The SSMP 10-Year Plan projects are being developed to meet the targets defined in the SWRCB WR 2017-0134. Refer to response comment 55-3.
55-98	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 4. New River Expansion Project – Up to 6,850 acres; 83,342 af/year river water. f. The SSMP should plan for this project to be expeditiously superseded by implementation of the long-range plan, which I recommend should be an ocean water importation plan.	Refer to comment response 55-81.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-99	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 5. Alamo River Project – Up to 8310 acres; 120,546 af/year (104,193 af river water, 16,343 af Sea water). I suggest that a version of the Alamo River Project, modified as indicated below, should be retained as part of the 10-Year Plan.	Comment noted. See individual responses below.
55-100	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 5. Alamo River Project – Up to 8310 acres; 120,546 af/year (104,193 af river water, 16,343 af Sea water) a. It appears that the ponds created for this project will be relatively low-salinity waterbodies. If so, they will have higher net GHG emissions than more saline waterbodies. In addition, the excavation of subsurface lakebed sediments and the use of those sediments for levees impounding the project's ponds, and for other purposes, will cause the emission of significant GHGs. The high sediment-to-water and edge-to-volume ratios of ponds, and the possible lack of a robust ecosystem with multiple trophic levels, are additional factors that are likely to yield high net GHG emissions. (See Attachment 4.) The SSMP should modify the project to mitigate these problems and minimize GHG emissions to the greatest feasible extent.	Refer to comment response 55-31 and 55-93.
55-101	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 5. Alamo River Project – Up to 8310 acres; 120,546 af/year (104,193 af river water, 16,343 af Sea water) b. Significant seismic risks are associated with this project. It will be constructed on top of the Brawley Seismic Zone. It is also close to other faults beneath the Salton Sea lakebed, and near the Imperial Fault and southern San Andreas Fault. This project would also be vulnerable to possible induced seismicity related to expansion of geothermal energy production and implementation of commercial-scale lithium production. Nonetheless, risks to public safety could be minimized by not allowing public access onto any vulnerable berms, levees, or other structures used to support large water impoundments, if any are created pursuant to this interim project.	Refer to comment response 55-52.
55-102	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 5. Alamo River Project – Up to 8310 acres; 120,546 af/year (104,193 af river water, 16,343 af Sea water) c. Risks from both unexploded ordnance and legacy pesticides are associated with this project, as are risks related to the bioaccumulation of selenium. All these risks should be avoided or mitigated to the maximum feasible extent.	Refer to comment responses 55-61 and 55-62.
55-103	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 5. Alamo River Project – Up to 8310 acres; 120,546 af/year (104,193 af river water, 16,343 af Sea water) d. Retention of river water for ponds may cause increased exposure of lakebed basinward of this project, as well as increased salinity of the remnant Salton Sea. It is unclear whether the modeling done regarding exposed lakebed and Salton Sea salinity considered this issue.	Refer to comment response 55-78.
55-104	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 5. Alamo River Project – Up to 8310 acres; 120,546 af/year (104,193 af river water, 16,343 af Sea water) e. The design of this project should be adjusted in light of the fact that it is an interim, short-term project. Its characteristics should be only as ambitious as necessary to provide the most urgently-needed habitat and dust control, in a manner that is as efficient and inexpensive as possible, until a long-range plan is implemented.	Refer to comment response 55-97.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-105	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 5. Alamo River Project – Up to 8310 acres; 120,546 af/year (104,193 af river water, 16,343 af Sea water) f. The SSMP should plan for this project to be expeditiously superseded by implementation of the long-range plan, which I recommend should be an ocean water importation plan.	Refer to comment response 55-98.
55-106	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 6. Audubon California Bombay Beach Wetland Project – Up to 930 acres. I suggest that it would be acceptable for a version of this project, modified as indicated below, to be retained as part of the 10-Year Plan if GHG emissions are minimized, and if removal of established vegetation is limited to the greatest degree possible, while providing important wildlife habitat.	Comment noted. See individual responses below.
55-107	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 6. Audubon California Bombay Beach Wetland Project – Up to 930 acres. a. This project would rely on surface water from natural streams, perennial flow from upstream discharges, ephemeral stormwater runoff, and shallow groundwater discharge. This project is likely to cause the emission of significant quantities of GHGs because it will be a freshwater wetland that is not connected (or not substantially connected) to the Salton Sea, and because construction and maintenance of the project will involve disturbing exposed areas of lakebed, excavating and moving subsurface lakebed sediments, spreading water across otherwise dry areas of lakebed, and removing large, established shrubs and trees. Steps should be taken to minimize GHG emissions to the maximum feasible extent, as discussed in section VI.	Refer to comment responses 55-31 and 55-93.
55-108	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 6. Audubon California Bombay Beach Wetland Project – Up to 930 acres. b. It appears that this project will retain and spread water that would otherwise flow directly onto the exposed lakebed and into the remnant Salton Sea. The retention of water, and the evaporation of it where it is retained and spread, will likely cause increased exposure of lakebed basinward of this project, as well as increased salinity of the residual Salton Sea. It is unclear whether the modeling done regarding exposed lakebed and Salton Sea salinity considered this issue.	Refer to comment response 55-78.
55-109	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 6. Audubon California Bombay Beach Wetland Project – Up to 930 acres. c. The design and extent of this project should be adjusted in light of the fact that it is an interim, short-term project. Its characteristics should be only as ambitious as necessary to provide the most urgently-needed habitat and dust control, in an efficient and inexpensive manner, with the least possible disturbance of lakebed sediments and established vegetation, until the long-range plan is implemented.	Refer to comment response 55-97.
55-110	8/19/2022	Email	Jenny E. Ross	IX.B. Continued 6. Audubon California Bombay Beach Wetland Project – Up to 930 acres. d. To the extent this project is constructed on exposed Salton Sea lakebed, the SSMP and Audubon California should plan for it to be expeditiously superseded by implementation of the long-range plan, which I recommend should be an ocean water importation plan.	Refer to comment response 55-81.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-111	8/19/2022	Email	Jenny E. Ross	<p>X. Components and Effects of the 10-Year Plan Project “Alternatives”A. General Comments on the Alternatives1. Effects of the Alternatives on Biological Resources</p> <p>As explained in Section 5.4 and summarized in Table 5-15 of the Draft EA, the Alternatives would have major negative effects on biological resources, including but not limited to destruction of riparian habitat, and (for two of the Alternatives) bioaccumulation of selenium to levels that may harm wildlife. Although the mitigation measures for these problems discussed in the Draft EA are feasible and should be utilized, it appears that some level of habitat damage and wildlife harm will be unavoidable if the Alternatives are implemented as described in the Draft EA. Therefore, I suggest that the SSMP should reconsider and preferably eliminate aspects of each Alternative that are associated with a significant risk of direct or indirect harm to wildlife and/or that involve removal of large quantities of established vegetation, especially trees and woody shrubs, and/or that involve destruction of existing wetlands. Removal of established vegetation and destruction of vegetated wetlands should be minimized both in order to limit indirect impacts on wildlife and to limit carbon emissions from dead vegetation that would otherwise not occur if the vegetation were to remain alive and to continue storing carbon. The design and scope of each project component to be considered for implementation should be modified in advance to minimize foreseeable adverse effects on wildlife, established vegetation, and existing wetlands to the greatest extent possible, while still completing the most crucial project components that will quickly yield significant net benefits during the project’s relatively short operational life until the long-range plan is implemented.</p>	Based on the existing onsite vegetation, effects to native riparian vegetation is not expected to exceed 2 acres, but up to 1,588 acres of tamarisk woodland and scrub (non-native riparian habitat) may be removed. Tamarisk woodland demands more water than native vegetation and tends to crowd out native vegetation but can serve as habitat for some species. However, implementation of MM BIO-1 (Prepare and Implement a Habitat Protection, Mitigation, and Restoration Program) would ensure project activities avoid occupied riparian, wetland, and other sensitive habitats, particularly during seasons where local wildlife would be most vulnerable to impacts (i.e., nesting season). Implementation of MM BIO-5 (Prepare and Implement a Program-level Nesting Bird Management Plan), MM BIO-6 (Prepare and Implement a Program-level Special-status Wildlife Species Management and Survey Plan), MM BIO-7 (Conduct noise measurements and implement noise attenuation measures, if needed), and MM BIO-8 (Design interception canals to minimize alteration of water levels in adjacent marshes) would prevent major impacts on common and special-status species. In addition, all tamarisk habitat removal would be restored with native plant communities, which is expected to ultimately provide a benefit to native wildlife inhabiting riparian habitat.
55-112	8/19/2022	Email	Jenny E. Ross	<p>X.A. Continued</p> <p>2. Effects of the Alternatives on Farmland</p> <p>The SSMP anticipates that each Alternative will have a different effect on farmland, and some Alternatives will not have any farmland effects. Regarding this issue I include comments below only for each proposed Alternative that is expected to cause elimination of Prime Farmland and/or Farmland of Statewide Importance, and I explain that those Alternatives should be modified in order to prevent elimination of those crucial types of farmland.</p>	Refer to comment response 55-71.
55-113	8/19/2022	Email	Jenny E. Ross	<p>X.A. Continued</p> <p>3. Hunting in Habitat Components of the Alternatives</p> <p>The Draft EA indicates that hunting may be allowed in habitat areas created by some of the Alternatives. I suggest that hunting would be completely inappropriate. The purpose of creating habitat pursuant to the 10-Year Plan is to conserve the species reliant on the Salton Sea ecosystem, and hunting is fundamentally incompatible with that crucial goal.</p> <p>There are many other locations in the Salton Sea region, both private and public, where hunting is already permitted. There is no need to allow hunting in habitat components of the 10-Year Plan, and doing so would undermine the most important purpose for creating those components.</p>	Refer to comment response 55-72.
55-114	8/19/2022	Email	Jenny E. Ross	<p>X.A. Continued</p> <p>4. Effects of the Alternatives on the Long-Range Plan</p> <p>If the 10-Year Plan Proposed Project or a modified version of it is implemented, the SSMP should not use any techniques for dust control or for habitat creation and maintenance that could jeopardize implementation or operation of the long-range plan, or that will require costly remediation or removal if they are inconsistent with, or create problems for, the long-range plan. Techniques that may be problematic include the application of gravel to cover the surface of the lakebed in an attempt to control dust, the use of riprap on the lakebed and/or for structural support of berms or levees, and the application of water-insoluble or water-resistant soil binders that harden the surface of the lakebed. It may be necessary or desirable later to submerge areas that have been subjected to the use of such techniques when the long-range plan is implemented, and significant problems may result. Gravel-covered lakebed surfaces could be problematic in the future for both the restored Salton Sea ecosystem and for recreation; riprap could pose outright dangers for various potential future recreational uses of the restored Salton Sea; and a hardened lakebed that is water-insoluble and chemically-stable would be an ecologically problematic and improper substrate for the future restored Salton Sea or a future wetland.</p>	Refer to comment response 55-73.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-115	8/19/2022	Email	Jenny E. Ross	X.B. Alternative 1 – “Maximum Lake Edge” The SSMP estimates this 25,690-acre project will require 351,083 af/year of river water and 43,697 af/year of Salton Sea water, in addition to the estimated SCH water requirements (54,128 af/year of river water and 8,490 af/year of Salton Sea water). Therefore, the total amount of water required for operation of Alternative 1 plus the SCH would be at least 457,398 af/year. (See Table JER-1, appended as Attachment 2.) I suggest that this quantity of water should be considered the minimum annual requirement because the amount of water projected to be needed for the SCH is an underestimate, and because more water will be needed for operation of the project as the climate continues to become increasingly warm and dry.	Refer to Appendix C (formerly Appendix F in Draft EA), which has been revised in the Final EA to include additional modeling results and to present the water demand by individual project component and alternative.
55-116	8/19/2022	Email	Jenny E. Ross	X.B. Continued Alternative 1 – “Maximum Lake Edge” For the following reasons I recommend that this Alternative should not be implemented, and should instead be eliminated from consideration.	Comment noted. See individual responses below.
55-117	8/19/2022	Email	Jenny E. Ross	X.B. Continued Alternative 1 – “Maximum Lake Edge” 1. If this project were implemented it is likely that, in combination with the SCH, it would consume most or all water available in the central Salton Basin (other than groundwater and stormwater) in the relatively near future. In the longer term, the large amount of water required for this Alternative plus the SCH may be partially or completely unavailable. Certainly, because of water scarcity in the future, if this alternative is implemented as the 10-Year Plan and an in-basin plan incorporating its components is selected as the long-range plan, it is very likely that the long range plan will consist of nothing more than the components of this project, and it is likely that there won't even be enough water to sustain these features.	Refer to comment response 55-115.
55-118	8/19/2022	Email	Jenny E. Ross	X.B. Continued Alternative 1 – “Maximum Lake Edge” 2. The amount of acreage in this project – 25,690 acres – is not enough to comply with WR 2017-0134, which requires a total of 29,800 acres of habitat and dust control measures to be completed by the end of 2028. The total amount of project acreage is only sufficient to satisfy the requirements of WR 2017-0134 if the SCH acreage (4,110 acres) is added to the total for Alternative 1, but that is not permissible pursuant to the explicit terms of WR 2017-0134. If other habitat acreage is added to this project, even more water than the already large amount will be necessary to operate it.	Acreage for the SCH Project is included in the acreage for this alternative. Refer to comment response 55-4.
55-119	8/19/2022	Email	Jenny E. Ross	X.B. Continued Alternative 1 – “Maximum Lake Edge” 3. Notwithstanding the fact that the acreage is insufficient to comply with WR 2017-0134, based on past SSMP performance and the current status of SSMP activities it appears extremely unlikely that the entire Alternative 1 project can be constructed by 2028.	Comment noted. The SSMP Team expects to deliver projects at a faster rate in the future.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-120	8/19/2022	Email	Jenny E. Ross	X.B. Continued Alternative 1 – “Maximum Lake Edge” 4. Implementation of this alternative would likely result in very large quantities of GHGs being emitted to the atmosphere. Constructing and maintaining a minimum of roughly 100 miles of levees would be necessary to impound the project’s waterbodies. If those levees are constructed of excavated lakebed sediments, as seems virtually certain, it should be expected that they will release significant amounts of greenhouse gases on an ongoing basis. Sediments in which large quantities of organic carbon was sequestered for hundreds, thousands, or even tens of thousands of years would release their carbon to the atmosphere as the result of biological and biogeochemical processes that will occur once the sediments are excavated. Oxygenation, warming, moistening, and/or shallow submersion of the excavated subsurface sediments would create soil environments in which microbial activities would emit major quantities of GHGs on a continuous basis. Wetting, drying, and re-wetting of the sediments would spur large pulses of GHG emissions. In addition, the ponded waterbodies are themselves also likely to release significant quantities of GHGs. Shallow, low-salinity waterbodies may emit large amounts of CO2, and potentially methane and nitrous oxide. Based on data in the relevant scientific literature, it is highly likely that the amounts of GHG emissions collectively released by the components of this project would be at least as large as from undisturbed dry lakebed, and potentially they would be much larger. (See Attachment 4.)	Refer to comment response 55-31.
55-121	8/19/2022	Email	Jenny E. Ross	X.B. Continued Alternative 1 – “Maximum Lake Edge” 5. Although this project is characterized in the Draft EA as an “Aquatic Habitat Restoration Project,” based on the project description and other comments elsewhere in the Draft EA, it is actually intended primarily to provide waterbodies for recreation in proximity to lakeshore communities. It is therefore unlikely to provide significant benefits for birds, as explained in sections IX.B.1.a and IX.B.2.a above. While the provision of extensive, high-quality, water- based recreational opportunities should be an important goal of a long-range plan, it is not a goal of the 10-Year Plan, as explained in section II above. The 10-Year Plan is supposed to consist of urgently-needed habitat and dust control measures that will be put in place on an interim basis and maintained for a relatively short period of time until a long-range plan is implemented.	Refer to comment response 55-74.
55-122	8/19/2022	Email	Jenny E. Ross	X.B. Continued Alternative 1 – “Maximum Lake Edge” 6. Many of the levees necessary for this project would be constructed on top of or adjacent to active faults. All structures on the lakebed would sustain significant damage or completely disintegrate as a result of shaking, co-seismic slip, and/or liquefaction if a major earthquake occurs. Such an event could result in complete loss of fresh and low-salinity water from impoundments, and blending of that water with extremely hypersaline water in the central basin. In such circumstances, rebuilding of the entire project might be necessary. Potentially, such rebuilding might not be feasible. A major earthquake would also pose serious risks to people who are on levees, or recreating in project waterbodies impounded within levees, that may collapse.	Refer to comment response 55-52.
55-123	8/19/2022	Email	Jenny E. Ross	X.B. Continued Alternative 1 – “Maximum Lake Edge” 7. The components of this project to be constructed adjacent to the mouth of the Whitewater River/Coachella Valley Stormwater Channel (CVSWC) at the north end of the Salton Sea will be vulnerable to destruction by flooding. A wetland previously constructed in that area by the Torres Martinez Tribe was destroyed by flooding in 2012. In the event of a large, destructive flood event, rebuilding of the entire project might be necessary. Potentially, such rebuilding might not be feasible. The Draft EA states, “An allowance would be made to pass flood flows from the CVSWC into the Sea. Several methods are being investigated that would provide this flood protection.” ⁶² However, in light of the design and purpose of the CVSWC, and the magnitude of the flood flows it is known to release at and adjacent to its mouth, it seems unlikely that prevention of damage to the project from flooding can be assured. Certainly the infrastructure necessary for an attempt to prevent such damage would be major and costly.	Refer to comment response 55-89.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-124	8/19/2022	Email	Jenny E. Ross	<p>X.C. Alternative 2 – “Aquatic Habitats & Enhance and Expand Existing Wetlands”</p> <p>The SSMP estimates this 25,690-acre project will require 285,413 af/year of river water and 22,572 af/year of Salton Sea water, in addition to the estimated SCH water requirements (54,128 af/year of river water and 8,490 af/year of Salton Sea water). Therefore, the total amount of water required for operation of Alternative 2 plus the SCH would be at least 370,603 af/year. (See Table JER-1, appended as Attachment 2.) I suggest that this quantity of water should be considered the minimum annual requirement because the amount of water projected to be needed for the SCH is an underestimate, and because more water will be needed for operation of the project as the climate continues to become increasingly warm and dry.</p>	Refer to comment response 55-115.
55-125	8/19/2022	Email	Jenny E. Ross	<p>X.C. continued</p> <p>Alternative 2 – “Aquatic Habitats & Enhance and Expand Existing Wetlands”</p> <p>For the following reasons I recommend that this Alternative should not be implemented, and should instead be eliminated from consideration.</p>	Comment noted. See individual responses below.
55-126	8/19/2022	Email	Jenny E. Ross	<p>X.C. continued</p> <p>Alternative 2 – “Aquatic Habitats & Enhance and Expand Existing Wetlands”</p> <p>1. Comments X.B.1 through X.B.7 above concerning Alternative 1 are equally applicable to Alternative 2.</p>	Refer to comment responses 55-117 through 55-123, above. This also includes referring to comment responses 55-4, 55-31, 55-52, 55-74, and 55-89.
55-127	8/19/2022	Email	Jenny E. Ross	<p>X.C. continued</p> <p>Alternative 2 – “Aquatic Habitats & Enhance and Expand Existing Wetlands”</p> <p>2. Alternative 2 would cause the long-term elimination of a total of 206.7 acres of productive farmland in Imperial and Riverside Counties, including: 27.3 acres of Prime Farmland, 38.5 acres of Farmland of Statewide Importance, 0.3 acres of Unique Farmland, and 183.1 acres of Farmland of Local Importance in Imperial County, and 23.6 acres of Farmland of Local Importance in Riverside County. The SSMP deems the amount of eliminated farmland to be “negligible” in comparison to the total amount of farmland currently existing in these counties, and states that the overall potential effects on farmland will be minor. I suggest these statements are misguided. To remove more than 200 acres of productive farmland from agricultural use is not something that should be done unless it is truly essential and there are no other reasonable options. It is not clear why Alternative 2 must impinge on any agricultural lands, and it is especially concerning that the SSMP feels compelled to remove Prime Farmland from production for the long term. The SSMP has not provided any explanation, or demonstrated that Alternative 2 cannot be modified in order to avoid eliminating high-quality, productive farmland. “Prime Farmland” is agricultural land with the best combination of physical and biogeochemical features, including soil quality, to sustain high yields in an economic manner and maintain long-term agricultural productivity. Its unique qualities are vital for support of the U.S. food supply. America’s Prime Farmland is a crucial and non-renewable resource that must not be eliminated. Farmland of Statewide Importance is similar to Prime Farmland, but with minor shortcomings that do not undermine its capacity to sustain high productivity for the long term. If Alternative 2 is retained for possible implementation (which I recommend should not happen), the SSMP should revise the boundaries of this project in order to minimize or exclude the use of any agricultural land, and to ensure no Prime Farmland or Farmland of Statewide Importance is removed from production.</p>	Refer to comment response 55-71.
55-128	8/19/2022	Email	Jenny E. Ross	<p>X.D. Alternative 3 – “North End/South End Aquatic Habitat”</p> <p>The SSMP estimates this 25,690-acre project will require 348,228 af/year of river water and 36,662 af/year of Salton Sea water, in addition to the estimated SCH water requirements (54,128 af/year of river water and 8,490 af/year of Salton Sea water). Therefore, the total amount of water required for operation of Alternative 3 plus the SCH would be at least 447,178 af/year. (See Table JER-1, appended as Attachment 2.) I suggest that this quantity of water should be considered the minimum annual requirement because the amount of water projected to be needed for the SCH is an underestimate, and because more water will be needed for operation of the project as the climate continues to become increasingly warm and dry.</p>	Refer to comment response 55-115.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-129	8/19/2022	Email	Jenny E. Ross	<p>X.D. Continued</p> <p>D. Alternative 3 – “North End/South End Aquatic Habitat”</p> <p>Comments X.B.1 through X.B.7 above concerning Alternative 1 are equally applicable to Alternative 3. For those reasons I recommend that this Alternative should not be implemented, and should instead be eliminated from consideration.</p>	Refer to comment responses 55-117 through 55-123, above. This also includes referring to comment responses 55-4, 55-31, 55-52, 55-74, and 55-89.
55-130	8/19/2022	Email	Jenny E. Ross	<p>X.E. Alternative 4 – “Water Conservation”</p> <p>The SSMP estimates this 25,690-acre project will require 83,623 af/year of river water, in addition to the estimated SCH water requirements (54,128 af/year of river water and 8,490 af/year of Salton Sea water). Therefore, the total amount of water required for operation of Alternative 4 plus the SCH would be at least 137,751 af/year. (See Table JER-1, appended as Attachment 2.) I suggest that this quantity of water should be considered the minimum annual requirement because the amount of water projected to be needed for the SCH is an underestimate, and because more water will be needed for operation of the project as the climate continues to become increasingly warm and dry.</p>	Refer to comment response 55-115.
55-131	8/19/2022	Email	Jenny E. Ross	<p>X.E. Continued</p> <p>Alternative 4 – “Water Conservation”</p> <p>I suggest it would be appropriate for a modified version of this project to be implemented, or for aspects of this Alternative to be incorporated into the Proposed Project in place of the components that I suggest should be eliminated from the Proposed Project.</p>	Comment noted.
55-132	8/19/2022	Email	Jenny E. Ross	<p>X.E. Continued</p> <p>Alternative 4 – “Water Conservation”</p> <p>1. The amount of acreage in this project– 25,690 acres – is not enough to comply with WR 2017-0134, which requires a total of 29,800 acres of habitat and dust control measures to be completed by the end of 2028. The total amount of project acreage is only sufficient to satisfy the requirements of WR 2017-0134 if the SCH acreage (4,110 acres) is added to the total for Alternative 4, but that is not permissible pursuant to the explicit terms of WR 2017- 0134. Habitat acreage should be added to this project, if there is sufficient water available.</p>	Refer to comment response 55-4.
55-133	8/19/2022	Email	Jenny E. Ross	<p>X.E. Continued</p> <p>Alternative 4 – “Water Conservation”</p> <p>2. Alternative 4 would cause the long-term elimination of a total of 42.2 acres of productive Farmland of Local Importance in Imperial and Riverside Counties. While the total farmland acreage eliminated from production is not large in comparison to the total amount of farmland existing in these counties, it is nonetheless productive acreage that would be removed from agricultural use for the long-term. It is unclear why this project must impinge on any farmland. If Alternative 4 is selected for implementation, the SSMP should revise the boundaries of the project in order to minimize or eliminate the use of agricultural land.</p>	Refer to comment response 55-71.
55-134	8/19/2022	Email	Jenny E. Ross	<p>X.E. Continued</p> <p>Alternative 4 – “Water Conservation”</p> <p>3. Retention of river water for ponds may cause increased exposure of lakebed basinward of this project, as well as increased salinity of the remnant Salton Sea. It is unclear whether the modeling done regarding exposed lakebed and Salton Sea salinity considered this issue.</p>	Refer to comment response 55-78.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-135	8/19/2022	Email	Jenny E. Ross	<p>X.E. Continued</p> <p>Alternative 4 – “Water Conservation”</p> <p>4. It appears that the aquatic features created for this project will be freshwater and/or relatively low-salinity waterbodies. If so, they will have higher net GHG emissions than more saline waterbodies. In addition, the excavation of subsurface lakebed sediments and the use of those sediments for levees or berms impounding the project’s aquatic components, and for other purposes, will cause the emission of significant quantities of GHGs. The high sediment-to- water and edge-to-volume ratios of ponds, and the possible lack of a robust ecosystem with multiple trophic levels, are additional factors that are likely to yield high net GHG emissions. (See Attachment 4.) The SSMP should modify the project to mitigate these problems and minimize GHG emissions to the greatest feasible extent.</p>	Refer to comment response 55-31.
55-136	8/19/2022	Email	Jenny E. Ross	<p>X.E. Continued</p> <p>Alternative 4 – “Water Conservation”</p> <p>5. Significant seismic risks are associated with this project. It will be constructed on top of and close to active faults and fault zones located beneath the lakebed. The project components are also near other major faults, including the Imperial Fault and southern San Andreas Fault. In addition, this project would be vulnerable to possible induced seismicity and subsidence related to expansion of geothermal energy production and implementation of commercial- scale lithium production. Nonetheless, risks to public safety could be minimized by not allowing public access onto any vulnerable berms, levees, or other structures used to support large water impoundments, if any are created pursuant to this project.</p>	Refer to comment response 55-52.
55-137	8/19/2022	Email	Jenny E. Ross	<p>X.E. Continued</p> <p>Alternative 4 – “Water Conservation”</p> <p>6. Risks from both unexploded ordnance and legacy pesticides are associated with this project, as are risks related to the bioaccumulation of selenium. All these risks should be avoided or mitigated to the maximum feasible extent.</p>	Refer to comment responses 55-61 and 55-62.
55-138	8/19/2022	Email	Jenny E. Ross	<p>X.E. Continued</p> <p>Alternative 4 – “Water Conservation”</p> <p>7. I suggest that it would be appropriate to use an amended version of this Alternative as the 10-Year Plan, or incorporate aspects of this Alternative into the Proposed Project in place of components I suggest should be eliminated from the Proposed Project. The design of any aspects of this Alternative that the SSMP ultimately utilizes should be adjusted in light of the fact that it is an interim, short-term project. Its characteristics should be only as ambitious as necessary to provide the most urgently-needed habitat and dust control, in a manner that is as efficient and inexpensive as possible, until a long-range plan is implemented.</p>	Refer to comment response 55-81.
55-139	8/19/2022	Email	Jenny E. Ross	<p>X.E. Continued Alternative 4 – “Water Conservation”</p> <p>8. If a modified version of this project is implemented, or if aspects of this Alternative are incorporated into the Proposed Project in place of components I suggest should be eliminated from the Proposed Project, the SSMP should plan for such features to be expeditiously superseded by implementation of the long-range plan, which I recommend should be an ocean water importation plan.</p>	Comment noted. Refer to comment response 55-73.
55-140	8/19/2022	Email	Jenny E. Ross	<p>X.F. Alternative 5 – “Maximum Build Out”</p> <p>The SSMP estimates this 25,690-acre project will require 327,772 af/year of river water and 32,065 af/year of Salton Sea water, in addition to the estimated SCH water requirements (54,128 af/year of river water and 8,490 af/year of Salton Sea water). Therefore, the total amount of water required for operation of Alternative 5 plus the SCH would be at least 422,455 af/year. I suggest that this quantity of water should be considered the minimum annual requirement because the amount of water projected to be needed for the SCH is an underestimate, and because more water will be needed for operation of the project as the climate continues to become increasingly warm and dry.</p>	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-141	8/19/2022	Email	Jenny E. Ross	X.F. continued Alternative 5 – “Maximum Build Out” For the following reasons I recommend that this Alternative should not be implemented, and should instead be eliminated from consideration.	Comment noted.
55-142	8/19/2022	Email	Jenny E. Ross	X.F. continued Alternative 5 – “Maximum Build Out” 1. Comments X.B.1 through X.B.7 above concerning Alternative 1 are equally applicable to Alternative 5.	Refer to comment responses 55-117 through 55-123, above. This also includes referring to comment responses 55-4, 55-31, 55-52, 55-74, and 55-89.
55-143	8/19/2022	Email	Jenny E. Ross	X.F. continued Alternative 5 – “Maximum Build Out” 2. Alternative 5 would cause the long-term elimination of a total of 77.5 acres of productive farmland in Imperial and Riverside Counties, including: 6.4 acres of Prime Farmland, 0.10 acres of Unique Farmland, and 34.8 acres of Farmland of Local Importance in Imperial County, and 36.2 acres of Farmland of Local Importance in Riverside County. While the total farmland acreage eliminated from production is not large in comparison to the total amount of farmland existing in these counties, it is nonetheless productive acreage – including Prime Farmland – that would be removed from agricultural use for the long-term. “Prime Farmland” is agricultural land with the best combination of physical and biogeochemical features, including soil quality, to sustain high yields in an economic manner and maintain long-term agricultural productivity. America’s Prime Farmland is a crucial and non-renewable resource, and its unique qualities are vital for support of the U.S. food supply. It is unclear why the project must impinge on any agricultural lands, and it is concerning that the SSMP feels compelled to remove any Prime Farmland from production. No explanation is provided. If Alternative 5 is retained for possible implementation (which I recommend should not happen), I suggest that the SSMP should revise the boundaries of the project in order to minimize or eliminate the use of agricultural land, and to ensure that no Prime Farmland is removed from production.	Refer to comment response 55-71.
55-144	8/19/2022	Email	Jenny E. Ross	X. Continued G. Alternatives 6 and 7 – “No Federal Action” and “No Action” Although various aspects and implications of Alternatives 6 and 7 are unclear, it appears that both of these alternatives would violate the terms of WR 2017-0134, and both could potentially be extremely harmful for wildlife and for public health during the period prior to implementation of the long-range plan for Salton Sea restoration. Therefore, I suggest these Alternatives should be deemed unacceptable options and eliminated from consideration.	Alternative 7, the No Action Alternative, is required under NEPA, even though the commenter is correct that this alternative would not meet the requirements of WR2017-0134. The No Federal Action Alternative was included to demonstrate what the effect of the Corps not issuing a permit would be. It also is the baseline from which effects of the proposed project and federal actions are analyzed.
55-145	8/19/2022	Email	Jenny E. Ross	XI. Conclusions & Recommendations A. The 10-Year Plan was intended to be – and should be designed and implemented as – an interim plan to address the most urgent needs for habitat and dust control. The selected components should be executed quickly and efficiently, and should remain in place on a temporary basis until a long-range plan for full Salton Sea restoration is implemented. The 10-Year Plan should not be thought of as a portion of a long-range plan that will continue to be operational into the indefinite future (or for a 75-year project life as assumed in the Draft EA), and the components of the 10-Year Plan should not be selected based on the assumption that they will have such a long life. The techniques and materials used for implementing the components of the 10-Year Plan should also not be selected based on the assumption they are needed for a multi- decadal project. Rather, it should be assumed that the 10-Year Plan will be fully superseded by a long-range plan that will be implemented expeditiously.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-146	8/19/2022	Email	Jenny E. Ross	XI. Continued B. Based on the extremely slow pace at which the SSMP has been proceeding with constructed habitat and dust mitigation measures so far, it appears extremely unlikely that planning and construction of the 10-Year Plan Proposed Project as currently envisioned – or as presented in Alternatives 1, 2, 3, and 5 – will be completed by 2028 as assumed in the Draft EA. Therefore, it is possible that a long-range plan accomplishing ocean water importation for Salton Sea restoration could be constructed and operational by the time the 10-Year Plan as currently designed is fully implemented. Consequently, it makes little sense to invest the time, money, and human resources necessary to implement the more complex, problematic, expensive, time-consuming, risky, and less crucial aspects of the 10-Year Plan as proposed in the Draft EA.	Comment noted.
55-147	8/19/2022	Email	Jenny E. Ross	XI. Continued C. The SSMP should proceed as quickly as possible with design and implementation of a revised 10-Year Plan that uses an amended subset of the components in the Proposed Project. Some modified components of the “Water Conservation” proposal presented as Alternative 4 may also be added to increase habitat acreage, as discussed above. Alternatively, the SSMP should proceed with an amended version of Alternative 4, as explained previously. Either way, the modified 10-Year Plan should be designed as an interim plan that can be quickly and efficiently implemented and will remain in place only until the long- range plan becomes operational. 1. The SSMP should not proceed with proposed components of the 10-Year Plan that are focused on recreation, such as the North Lake Demonstration Project and North Lake Project. If one of the proposed in-basin long-range plans is selected as the long- range plan to be implemented (which I strongly suggest would be seriously misguided for a variety of reasons, as noted above), such projects or similar ones could be implemented as part of that long-range in-basin plan. On the other hand, if an ocean water importation plan is selected for implementation as the long-range plan (as I recommend), there will be no need to proceed with such deferred recreational components of the 10-Year Plan. 2. When executing the 10-Year Plan, the SSMP should not use any techniques for dust control or for habitat creation and maintenance that could jeopardize implementation or operation of the long-range plan, or that will require costly remediation or removal if they are inconsistent with, or create problems for, the long-range plan. The 10-Year Plan should be focused on minimizing harm in the short-term while a long-range plan is developed and implemented, and should not include any actions that could negatively affect any aspect of the long-range plan.	Comments noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
55-148	8/19/2022	Email	Jenny E. Ross	<p>XI.C. Continued</p> <p>3. The guiding principles for choosing which features of the proposed 10-Year Plan to implement, and determining how to implement them, should be:</p> <ul style="list-style-type: none"> a. Maximize the amount and variety of habitat as quickly as possible, prioritizing locations where: (1) water is readily available; (2) the most appropriate, varied, and extensive habitats can be created with the available water; and (3) construction of habitat will also serve to suppress fugitive dust in a highly emissive area where wind patterns would otherwise cause the emitted particulates to threaten populated areas. b. Minimize dust emissions while avoiding – to the maximum extent feasible – the use of measures that substantially disturb, dig into, and/or rewet the exposed lakebed. Prioritize locations for dust control based on soil emissivity, prevailing winds, and greatest threats to populated areas, with particular attention to protecting communities designated by CalEnviroScreen (Draft EA, Figure 4-3) as ones already bearing a high pollution burden. c. Avoid, whenever feasible, extensive removal of established vegetation (including but not limited to large, woody tamarisk shrubs and trees) and destruction of existing wetlands used by wildlife, even if it is presumed that the 10-Year Plan might ultimately establish replacement habitat. d. Limit potential risks to wildlife and to human health and public safety by: (a) minimizing excavation and re-use of subsurface lakebed sediments containing elevated levels of legacy pesticides, including DDT and DDE; (b) limiting potential for bioaccumulation of selenium; and (c) avoiding disturbance of unexploded ordnance within lakebed sediments. e. Minimize emission of greenhouse gases – including carbon dioxide, methane, and nitrous oxide – from point sources burning fossil fuels as well as from habitat projects, exposed lakebed, and dust control measures used on the exposed lakebed. f. Avoid, whenever feasible, constructing project components on top of or adjacent to identified faults or fault zones located beneath the lakebed. g. Prioritize proceeding with plan components that can be implemented most quickly at the lowest cost, keeping in mind that they are not meant to be permanent. 	Comments noted.
55-149	8/19/2022	Email	Jenny E. Ross	<p>XI. Continued</p> <p>D. Concurrently with the execution of the 10-Year Plan, the SSMP should also prioritize and move forward efficiently with the long-range plan. Development and implementation of the 10-Year Plan and the long-range plan should proceed simultaneously, on separate tracks and preferably with separate personnel and contractors designated to work on each, in order to ensure that both the 10-Year Plan and the long-range plan are implemented as quickly and effectively as possible.</p>	Comment noted.
55-150	8/19/2022	Email	Jenny E. Ross	<p>XI. Continued</p> <p>E. I urge the SSMP to select an ocean water importation plan as the long-range plan, and proceed expeditiously to implement it, because it is the only option that: (a) can actually accomplish permanent restoration of the Salton Sea ecosystem in the manner required by the Salton Sea Restoration Act; (b) will avoid a variety of serious harms to wildlife and people sought to be minimized by the Salton Sea Restoration Act and other relevant state and federal legislation, regulations, and policies; (c) will have a permanent water supply independent of the Colorado River that will not be affected by the impacts of climate change on hydrology; (d) will avoid numerous significant risks and negative effects inherent in proposed in-basin long-range plans; and (e) will have major, ongoing beneficial effects, including providing high-quality recreational opportunities and supporting a vigorous regional economy.</p>	Comment noted. Refer to comment response 6.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
56	8/19/2022	Letter	CVWD	Coachella Valley Water District (CVWD) thanks the US Army Corps of Engineers (Corps) and Salton Sea Management Program (SSMP) for the opportunity to present the following comments on the Draft Environmental Assessment (EA) for the Salton Sea Management Program Phase 1: 10-Year Plan, and establishment of Letters of Permission (LOP) procedures for the project. CVWD is a public agency serving the Coachella Valley region of Southern California and regularly implements community focused projects involving a diverse array of services including, Domestic Water, Sanitation, Stormwater and Flood Control, Groundwater Replenishment, Agricultural Irrigation and Drainage, Recycled Water, and Water Conservation. CVWD's service area lies within the jurisdiction of the Colorado River Regional Water Quality Control Board, distinct to the Sonoran Desert and Arid West eco-region of the United States. CVWD's service area lies predominately at the North end of the Salton Sea. CVWD has extensive project permitting and water management experience within the Salton Sea watershed and for many decades has monitored the relationship between the Salton Sea, local groundwater conditions, and agricultural drains. CVWD comments are intended to share some of this knowledge to help improve the SSMP 10 Year Plan project implementation through the revised LOP procedures. CVWD understands the 10 Year Plan implementation has urgency, and in general CVWD supports the use of modified LOP procedures to streamline project permitting, however the following comments are provided to ensure an accurate environmental review has taken place under the National Environmental Policy Act (NEPA). The Corps, acting as the federal lead agency, as defined by the NEPA (10 CFR § 900.5), must ensure the EA analyzes environmental effects associated with the full implementation of the Proposed Project and alternatives. The following comments provide information regarding sections of the EA CVWD found deficient or inaccurate.	Comment noted. See individual responses below.
56-1	8/19/2022	Letter	CVWD	General Comment 1: Whitewater River Throughout the document, a distinction is lacking between the Whitewater River and the Coachella Valley Stormwater Channel (CVSC). The Whitewater River empties from the Whitewater River canyon into the Coachella Valley near Interstate 10 and soon thereafter becomes ephemeral flow and joins the Whitewater River Stormwater Channel (WRSC) infrastructure. The WRSC terminates and the CVSC begins just east of Point Happy near Washington Boulevard in La Quinta. The CVSC is an upland constructed conveyance that captures and conveys stormwater, drainage, agricultural return flows, and treated wastewater. Downstream of Valley Sanitation District in Indio, the CVSC is a perennial reach, continuing 17 miles to the confluence with the Salton Sea. Identifying the CVSC as the Whitewater River results in inaccurate findings listed in the EA. For example, Tables 4-45, 4-46, and 4-47 incorrectly attribute CVSC impairments, beneficial uses, and water quality objectives, respectively, to the Whitewater River.	The Colorado River Basin Regional Water Quality Control Board (CRBRWQCB) defines the CVSC as a "perennial reach" of the Whitewater River system and Board Order R7-2008-0001 is applicable to all reaches. A footnote (#4) has been added to Table 4-45 (now 4-53 in the Final EA) to clarify that the Whitewater River includes the section of flow from the headwaters in the San Gorgonio Mountains to (and including) the Whitewater Recharge Basins near Indian Avenue crossing in Palm Springs, and to indicate that the CVSC is a perennial reach of the Whitewater River. Table 4-46 (now 4-54 in the Final EA) reflects beneficial uses as presented in the CRBRWQCB's Basin Plan and no change was warranted or made. Table 4-47 (now 4-55 in the Final EA) includes new footnote #2, the same as footnote #4 for Table 4-53. Note that some table numbers and section numbers have changed from the Draft EA.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
56-2	8/19/2022	Letter	CVWD	<p>General Comment 2: Groundwater</p> <p>The Draft EA analyzes the Proposed Project and Alternatives for the construction of aquatic habitat restoration and dust control suppression projects within the exposed lakebed areas surrounding the Salton Sea. According to the Draft EA, the project's water needs will be supplied by the Coachella Valley Stormwater Channel, Alamo River, New River, agricultural drains around the Sea, and potentially groundwater and recycled water. We would like to express our concern that any groundwater extractions from the Indio Subbasin, from the shallow or deep aquifer, for the purposes of supplying these projects were not included in the recently completed 2022 Alternative Plan Update. The Indio Subbasin Groundwater Sustainability Agencies (GSAs) consisting of CVWD, Coachella Water Authority (CWA), Desert Water Agency (DWA), and Indio Water Authority (IWA) held seven public workshops during the development of the Alternative Plan Update to gather input from the stakeholders on all elements of the plan including projected water demands. The use of groundwater from the Indio Subbasin to meet the water demands of these Salton Sea projects was never brought up by any party or agency.</p> <p>As such and given the lack of specificity in the Draft EA regarding the amount of potential groundwater extraction from the Indio Subbasin, we would like to clearly and strongly convey that any additional demand on the groundwater from the Indio Subbasin not considered in the 2022 Alternative Plan Update is unlikely to be sustainable and would in all likelihood result in a range of undesirable impacts that must be analyzed. The Indio Subbasin GSAs have an obligation to manage the basin to avoid returning to overdraft conditions and any associated significant and unreasonable undesirable results. To this end, the 2022 Alternative Plan Update established minimum groundwater level thresholds based on best available historical information. Any plans to extract groundwater from the Indio Subbasin for the purposes of supplying water to the Salton Sea Projects must be developed in coordination with the GSAs with transparency about the amounts and locations of any groundwater extractions from the Indio Subbasin.</p> <p>We, therefore, request that the EA clearly identify the amount and locations of groundwater extractions from the Indio Subbasin before making a determination on whether the implementation of the Proposed Project or Alternatives is likely to result in significant environmental impacts. We also request that the EA include requirements for coordination with the GSAs and acknowledgement that any potential groundwater extractions from the Indio Subbasin must be consistent with the goals of SGMA. The EA must also acknowledge and consider the impacts of climate change to groundwater resources in the Indio Subbasin as was done in the 2022 Alternative Plan Update.</p>	<p>Refer to Appendix C (formerly Appendix F in Draft EA), which has been revised in the Final EA to include additional modeling results and to present the water demand by individual project component and alternative. The exact amount and locations of groundwater extractions are not known at this time and would be determined as part of project design. A new figure, Figure 5-4 (Existing and Proposed Groundwater Wells), has been added to the Final EA in Section 5.16.3 that shows existing and proposed groundwater well locations.</p> <p>A summary of the regulatory requirements for California's Sustainable Groundwater Management Act (SGMA) and updated Groundwater Sustainability Plan have been added to Table 4-51 (Regulatory Requirements for Water Resources) of the Final EA (formerly Table 4-43 in the Draft EA). Information regarding the Indio Subbasin has also been added to Table 4-58 (Project Area Groundwater Basins; formerly Table 4-50 in the Draft EA).</p> <p>Effect GW-1 (Project implementation would have little effect on groundwater availability or quality) has been revised to clarify inflow water sources for each alternative, as well as where groundwater may be needed. Two mitigation measures have been added to address potential impacts: MM GW-1 (Coordination with Indio Subbasin GSAs regarding groundwater extraction from Coachella Valley Basin) and MM GW-2 (Groundwater extraction from existing or proposed wells in the vicinity of Salt Creek shall be located at a sufficient distance to avoid effects to Salt Creek flows).</p> <p>Effect WS-1 (Project implementation would not result in any diversion of water supply from other beneficial uses and would not affect water rights) would still apply as described in the Final EA. Because none of the alternatives would divert water supply from other beneficial uses and would have no effect to existing water rights, no mitigation is required.</p>
56-3	8/19/2022	Letter	CVWD	<p>Page 3-5: (Alternatives 1, 2, & 3): North Lake Project Demonstration Project</p> <p>Please describe the Salton Sea Authority (SSA) role in the North Lake Demonstration (NLDP) regarding CEQA documentation, and lead agency for this environmental review. It is unclear if the intent of this document is to serve as project specific environmental review for the North Lake Project (NLP) and the NLDP. Very few details are available to sufficiently evaluate either. To truly be a demonstration project the NLDP and NLP should have similar water quality objectives and utilize similar sources of water. Specific water quality targets for salinity should be identified as salinity levels will directly affect environmental conditions, including, but not limited to, invasive species, pupfish predation, and selenium sequestration, which represent limiting factors in project success for aquatic habitat.</p> <p>The project is described as being supported by agricultural drainage, well water, canal water, or temporary canal water in the amount of 1,900-2650 acre feet per year (AFY). No details are provided on how this water is to be provided in a sustainable manner considering that some of these water supplies are fully allocated for existing uses identified in approved water management plans.</p>	<p>This EA addresses the required NEPA review for the SSMP 10-Year Plan. Completion of this EA or issuance of a Department of the Army permit does not obviate the need for the State to obtain other Federal, state, or local authorizations and clearances required by law to implement its Plan projects.</p> <p>SSA is a partner in the NLDP but not the CEQA lead. Riverside County is the project lead for the North Lake Demonstration Project, and the State Team is the project lead for the North Lake Project. The State's detailed project designs will be guided by water availability, water quality, and salinity targets, with specifics identified at the time the projects are ready to move forward.</p> <p>A new Section 3.17 and Table 3-7 were added to the EA to address project water demands, water availability, and water agreements.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
56-4	8/19/2022	Letter	CVWD	<p>Page 3-6: (Alternatives 1, 2, & 3): North Lake Project</p> <p>The text describes an allowance for passing flood flows from the Coachella Valley Stormwater Channel (CVSC) into the Salton Sea, yet no details on this potential component are provided. No outreach or coordination has taken place with CVWD to identify the facilities that would be needed to implement this option so it's unclear how the environmental impacts of these facilities could be evaluated. Identifying these facilities will need considerable input from CVWD to meet flood control maintenance and operations responsibilities of the CVSC to protect life and property within the Coachella Valley.</p>	<p>As discussed in Section 5.5.5 (Utilities, Effects Analysis) of the Final EA, an allowance would be made to pass flood flows from the CVSC into the Sea. The State is investigating several methods that would provide this flood protection. The ponds would provide both shallow- and deep-water fish and bird habitat and dust control and potentially provide opportunities for public use. The habitat would be brackish to saline, and the deep-water habitat area would be 8 to 12 feet deep. Three sources of water may be available to sustain these ponds: (1) the Whitewater River/CVSC; (2) local drains; and (3) the Sea. The estimated inflow required for the North Lake would be about 50,000 AFY, of which 20 percent, or 10,000 AFY, would need to be from saline water pumped from the Sea, and the remaining 40,000 AFY would need to be supplied by local surface water flows. Ponds would be created by constructing berms 10 to 15 feet high along the -245 to -250 feet elevation contours, with the water surface in the ponds planned at -237 feet below sea level.</p> <p>This project is included as part of the Proposed Project and under Alternatives 1, 2, 3, and 5. Projects adjacent to CVWD facilities would require coordination and input from CVWD.</p>
56-5	8/19/2022	Letter	CVWD	<p>Page 3-15: Emissivity in Project Area</p> <p>Figure 3-2 displays PM10 emission estimates in a very coarse color scale, where only the minimums and maximums are visible. This applicability of the figure should be further described in the text, including any threshold that may be utilized to categorize emissivity, as to how the locations for non-DSAP are prioritized. The year of the exposed playa modeled should be included on the figure, with DSAP and Non-DSAP projects shown independently from figure 3-1.</p> <p>Based on the figure Emissivity tends to decrease approaching open water, indicating up slope areas should be prioritized for dust suppression. The North End of the Sea is non-emissive and further details describing the reasoning for prioritizing projects in this area over more emissive playa locations should be justified and described in detail.</p>	<p>While one of the goals of the SSMP 10-Year Plan is to develop a range of dust suppression projects, the other goal is to develop a range of habitat projects to support fish and wildlife species. Projects at the North end of the Sea are multi-benefit projects that provide habitat as well as dust suppression on exposed lakebed. The alternatives were developed to show a range of projects and activities within the opportunity areas that are inclusive of DSAP and non-DSAP identified projects. The SSMP 10-Year Plan projects are being developed to meet the targets defined in the SWRCB WR 2017-0134.</p> <p>A citation has been added to Figure 3-2.</p>
56-6	8/19/2022	Letter	CVWD	<p>Page 3-16: Dust Suppression Techniques</p> <p>Information regarding Shallow-Water Habitat Dust Suppression actions does not take into account the current water conveyance infrastructure connected to the Salton Sea. Any new berms and reinforcement of existing berms cannot have an elevation greater than the existing invert of the CVSC, its tributaries or agricultural channels and drains, without having a potentially detrimental impact.</p>	<p>Section 3.12 (Design Considerations) in the EA was updated to reflect that new berms and existing berms reinforcement will be designed to avoid detrimental impacts on existing water districts or other agency operations, such as those owned, operated, or maintained by IID, CVWD, or Reclamation. In addition, any such structures would be constructed at an elevation lower than the invert of the CVSC, its tributaries, agricultural channels, and drains to reduce potential flooding impacts to these existing features.</p>
56-7	8/19/2022	Letter	CVWD	<p>Page 3-32 Alternative 6: No Federal Action</p> <p>A figure for this alternative should be available with statistics identifying the limitations and effectiveness of this alternative. As written, the alternative should not be considered based on the lack of information regarding federal participation. As previously states, the reliance entirely on well water is not sustainable.</p>	<p>While a No Action Alternative is required under NEPA, the Corps required evaluation of a No Federal Action Alternative, under which no projects would be built that require federal action, land, or money. Other than showing federal lands, this would be difficult to show on a figure, as each project has unique requirements that may or may not require a federal action.</p>
56-8	8/19/2022	Letter	CVWD	<p>Page 3-34: Design Considerations</p> <p>Information regarding presented in Table 3-5 should be clarified to take into account the current water conveyance infrastructure connected to the Salton Sea. Any Check Dams and weirs cannot have an elevation greater than the existing invert of the CVSC, its tributaries or agricultural channels and drains, without having a potentially detrimental impact.</p>	<p>Refer to comment response 56-6.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
56-9	8/19/2022	Letter	CVWD	<p>Page 3-37: Land Access Ownership</p> <p>CVWD is concerned the project may lack the coordinated review and approvals needed to allow continued operations and maintenance of irrigation pipelines and agricultural drains which supply return flow to the Salton Sea. CVWD operates and maintain US Bureau of Reclamation (BOR) Irrigation Pipelines along the northern banks in Riverside County. In addition, CVWD owns, operates, and maintains numerous agricultural drains, both underground pipes and open channels, along the north banks in Riverside County. The approximate limits are along Ave 86 on the west boundary of the Salton Sea, proceeding clockwise along the banks of the Salton Sea to approximately Hot Springs Road and Highway 111 near the border of Riverside and Imperial Counties. These drains and pipelines are within easements or fee owned land. These easements may not appear on title reports. Each easement may have different restrictions on what activities can be done within the easement. Project proponent should request from CVWD through public records request the location of easements, drains, and pipelines by providing specific APNs. If a conflict exists between the Project and CVWD/BOR facilities, the Project Proponent shall contact CVWD to coordinate and if necessary, obtain necessary permits/permissions to work within the easements and right of ways. Although the SSMP plans to coordinate with landowners for programmatic land access, as stated in section 3.13, consideration should also be made for easement holders on those parcels.</p>	Part of the design process will include working with the local agencies or governments to coordinate and if necessary, obtain necessary permits/permissions to work within the easements and rights-of-ways. Section 5.5.5 (Utilities, Built Environment, Effects Analysis) in the Final EA was updated accordingly (was Section 5.6.5 in the Draft EA).
56-10	8/19/2022	Letter	CVWD	<p>Page 3-40: Land Ownership</p> <p>Figure 3-9 incorrectly displays a gray polygon traversing the Salton Sea that should be removed. The Whitewater River label should be corrected and labeled as the Coachella Valley Stormwater Channel.</p>	Comment noted. The gray polygon on Figure 3-9 is the result of the imagery used for the figure and cannot be changed. The text in the EA has been updated to indicate that the CVSC is considered a perennial reach of the Whitewater River by RWQCB and therefore, the label "Whitewater River" for that stretch of the water course is not inaccurate. The figures have not been changed.
56-11	8/19/2022	Letter	CVWD	<p>Page 4-40: Desert Pupfish Habitat Requirements</p> <p>Currently the salinity in the Salton Sea is approximately 70 parts per thousand (ppt), the maximum threshold for adults and egg survival, yet is described as still being suitable for Desert Pupfish passage between agricultural drains where a freshwater signature may be present along the shoreline. With the continuation of freshwater flows to the Salton Sea in the future, it can be expected that brackish water will continue to be present at confluence locations along the Salton Sea shoreline. To date very little if any water quality studies of these mixing zones has been conducted at the Salton Sea. Salinity of the Salton Sea is generally presented as an average of 3 open water locations monitored by the Bureau of Reclamation. SSMP projects conceptualized to address habitat and water quality requirements should be based on peer reviewed data collection and reporting, with the objectives for implementation based on a relevant time scale to address appropriate conditions. Please describe the average salinity of the Sea when Desert Pupfish are expected to lose this shoreline habitat connectivity as stated, the anticipated timeline for this salinity level, the basis for this assumption, and the timeline relationship to the SSMP Phase 1 10-year Plan implementation.</p>	A salinity monitoring plan has been added to the desert pupfish protection and relocation plan measure (MM BIO-4). The timing of the decrease in shoreline connectivity habitat will depend on the size and volume of the habitat and amount of mixing with high salinity sea water. However, it is expected that project implementation would beneficially affect salinity in the Salton Sea's ecosystem by providing reduced salinity areas suitable for fish habitat through restoration of the shoreline and inflow deltas with aquatic habitat with lower salinity concentration. Target salinity concentrations of aquatic habitat restoration sites would generally be approximately 20 to 40 ppt. Therefore, it is expected that there will not be a significant loss in desert pupfish shoreline habitat connectivity.
56-12	8/19/2022	Letter	CVWD	<p>Page 4-99 – 4-100: Regulatory Requirements</p> <p>Regarding Water Resources potentially impacted by the project and the regulatory requirements of such, Table 4-43 should recognize California Water Code Section 10720 - Sustainable Groundwater Management Act (SGMA). SGMA includes Groundwater Sustainability Agencies (GSAs) mandated in the regulation. The GSAs of the Indio Subbasin are CVWD, CWA, DWA, and IWA, who operate in coordination with the Department of Water Resources (DWR), and the State Water Resources Control Board (SWRCB) to implement SGMA. SGMA was enacted in order to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. SGMA requires local agencies adopt sustainability plans for high- and medium-priority groundwater basins.</p>	<p>Table 4-51 in the Final EA (was Table 4-43 in the Draft EA) was revised to include SGMA and the Groundwater Sustainability Plan for the Indio Subbasin. Table 4-58 in the Final EA (was Table 4-50 in the Draft EA) was revised to present the Indio Subbasin separately from the Coachella Valley Basin.</p> <p>Note that some section and table numbers have changed from the Draft EA.</p>
56-13	8/19/2022	Letter	CVWD	<p>Page 4-106: Whitewater River</p> <p>Discussion of the CVSC is more relevant as the Whitewater River becomes ephemeral in the Coachella Valley, and it is the CVSC that actually provides flows to the Salton Sea. The CVSC captures and conveys agricultural return flow, drainage, treated wastewater, and ephemeral stormwater flows to the Salton Sea.</p>	<p>The CRBRWQCB classifies the CVSC as a perennial reach of the Whitewater River. Clarification made to Tables 4-53 and 4-55 in the Final EA (formerly Tables 4-45 and 4-47 in the Draft EA).</p> <p>Note that some section and table numbers have changed from the Draft EA.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
56-14	8/19/2022	Letter	CVWD	<p>Page 4-107: Agricultural Drains and Natural Water Courses</p> <p>The title of this section is misleading, as no description agricultural drains is provided in the following paragraph. The paragraph describes the stormwater collection infrastructure and ephemeral nature of such inputs to the Salton Sea. As potential water sources for projects, agricultural drains should be correctly described, and any potential impacts fully analyzed.</p> <p>In the Coachella Valley, due to high salinity in soils, and rising soil moisture, large scale farming would be impossible if it were not for the use of tile drains to remove excess salts, a practice referred to as leaching. Tile drains consists of a grid of perforated pipes laid below the root zone in agricultural fields, typically 6-10 feet deep, which coalesce at collection point with an agricultural drain. Drains are open channels carrying returns flow, which varies in amount depending on crop type, climatic conditions, and growing seasonality. In the Coachella Valley, irrigation water is used entirely on each farm, as surface water tail water discharge is strictly prohibited. Water not used by crops percolates into the ground where some enters tiles drains and combines with rising groundwater and salts that would eventually rise to the surface. The network of tile drains in the Coachella Valley give rise to intersecting agricultural drainage channels that carry rising groundwater and salts downslope to its terminus with the Salton Sea. Many of the drains connect to the CVSC and provide a significant contribution to the overall flow entering the Salton Sea from the Coachella Valley. These agricultural drains are monitored for both water quality and flow and are maintained by CVWD to ensure both agricultural and irrigation practices can continue.</p> <p>The document should contain perspective on the certainty of agricultural drain flows in consideration of long-term reliance for project implementation. The Salton Sea has been designated as an agricultural sump and return flows to the Salton Sea depend upon sustainable agricultural practices and continued existing land uses. Threats to the sustainable nature of agriculture include reduced Colorado River water supplies, conversion to urbanized areas, habitat and recreation features adjacent to the Salton Sea, and other land use changes. The SSMP must take into consideration the sustainability of agricultural return flows which is not fully analyzed in the document.</p> <p>The SSMP project water quality objectives, such as those for lakes and ponds that support aquatic species and habitat, could result in increased regulatory requirements on the agriculture community and irrigation agencies, which could impact continued agricultural land use and related inflows to the Salton Sea. The SSMP should put forth plans that do not conflict with agriculture and provide certainty in achieving project water quality objectives by analyzing water quality, volumes, future projections, to in turn develop a successful and sustainable project.</p>	Comment noted. The description of the use of tile drains in the Coachella Valley has been added to Section 4.16.3.2 (Agricultural Drains and Natural Watercourses) of the Final EA. Note that this was Section 4.12.2.2 in the Draft EA.
56-15	8/19/2022	Letter	CVWD	<p>Page 4-107: Salt Creek</p> <p>The document incorrectly states that the Salt Creek is largely an ephemeral drainage. Salt Creek is a stream gauged by USGS and has an archive record dating back to 1988, and additional records dating back to 1961. Although the drainage is historically an ephemeral drainage under natural conditions, due to artificial interventions and modifications such as the Coachella Canal seepage, records show the stream has a flow regime that has varied from perennial to intermittent.</p> <p>The document incorrectly states that the flows in Salt Creek have been reduced since the Coachella Canal Lining Project (CCLP) and the elimination of canal water seepage, and incorrectly, states the flows are generally dry from May to October. The CCLP project mitigations have been met each year of the project by ensuring at least 623 Acre Feet per year (AFY) are supplied through the USGS Gauge and reach the Salton Sea. Since 2018, the USGS record indicates the stream has maintained flow throughout these months with limited drying in July and August. Records kept by the CCLP Environmental Management Group (EMG) which includes CVWD, San Diego County Water Authority, Bureau of Reclamation, and Bureau of Land Management, indicate that despite drying of the stream in July at the USGS gauge near HWY 111, the upper portions of the stream near the Union Pacific Railroad Trestle have been largely sustained with complete desiccation of the stream avoided.</p>	Comment noted. The EA provides information regarding Salt Creek from reputable sources and, therefore, the text in the EA was not revised. However, the commenter provided information regarding Salt Creek after 2018, which is later than the information provided in the EA. The text starting with "Since 2018, the USGS record indicates..." has been added to the discussion regarding Salt Creek in Section 4.16.3.2 of the Final EA.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
56-16	8/19/2022	Letter	CVWD	<p>Page 4-108: Coachella and Highline Canals</p> <p>The section incorrectly describes the proportion of irrigation water attributed to pumped groundwater. In Water Year 2020-2021, pumped groundwater was 16%, or roughly 1/6 of farm irrigation utilized in the Coachella Valley. Although CVWD uses State Water Project exchanged for Colorado River water for groundwater replenishment, this exchange water is not delivered via the Coachella Canal and does not belong in this discussion.</p>	Comment noted. The discussion regarding the Coachella and Highline Canals has been updated.
56-17	8/19/2022	Letter	CVWD	<p>Page 4-109: Figure 4-16</p> <p>This figure incorrectly displays Directorial Divisions of CVWD and not the agricultural drain network of CVWD as intended. Please submit a Public Records request found at https://www.cvwd.org/documentcenter/view/3946 for accurate information to revise the figure.</p>	<p>As the Project would be reliant on existing agricultural drains, the intent of Figure 4-17 is to illustrate the existing network. The figure is sourced to CVWD, as it was the most current available information available during development of the Draft EA. The figure has been revised to reflect more current information available through CVWD.</p> <p>The CRBRWQCB classifies the CVSC as a perennial reach of the Whitewater River. Clarification made to Final EA Tables 4-53 and 4-55 (formerly Tables 4-45 and 4-47 in the Draft EA).</p>
56-18	8/19/2022	Letter	CVWD	<p>Page 4-110: Impaired Water Bodies within the Salton Sea Watershed</p> <p>Table 4-45 incorrectly refers to the Whitewater River rather than the CVSC for impairment designations. This table incorrectly includes selenium as an impairment for this water body.</p>	Refer to comment response 56-1. Selenium was removed from Table 4-53 in the Final EA (formerly Table 4-45 in the Draft EA).
56-19	8/19/2022	Letter	CVWD	<p>Page 4-111: Designated Beneficial Uses for Surface Waters in the SSMP Project Area</p> <p>Table 4-46 should be corrected to show the CVSC rather than the Whitewater River.</p>	The CRBRWQCB classifies the CVSC as a perennial reach of the Whitewater River. Refer to comment response 56-1.
56-20	8/19/2022	Letter	CVWD	<p>Page 4-113 – 4-114: Comparison of Water Quality Objectives with Current Conditions in the Project Area Surface Waters</p> <p>Table 4-47 should be corrected to show the CVSC rather than the Whitewater River and the total dissolved solids (TDS) objective of 4,000 mg/L listed for this water body is incorrect. CVWD suggests Nitrates and Nitrites, and Orthophosphate are reported in mg/L rather than µg/L.</p>	Table 4-55 was created to replace Table 4-47 in the Draft EA with more current information.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
56-21	8/19/2022	Letter	CVWD	<p>Page 4-116: Groundwater Hydrology and Quality</p> <p>The study area for analysis of hydrology and water quality includes seven basins, including the Indio Subbasin of the Coachella Valley Basin. The Draft EA incorrectly states that these basins represent the shallower portions of the Salton Sea basin and do not correspond to deeper formations or water bearing deposits that extend to the bedrock. Water yielding wells in the Indio Subbasin are drilled to more than 1,000 feet and is virtually the sole source of drinking water for the communities of the Coachella Valley. A small fraction, about 5%, of the drinking water DWA serves is surface water.</p> <p>Section 4 of the Draft EA must recognize and consider that the Indio Subbasin is unique among the other basins surrounding the Salton Sea with many beneficial uses and users. While the draft EA recognizes groundwater use by CVWD, it fails to recognize that it is the source of drinking water for the Coachella Valley municipal demands served by CVWD, CWA, DWA, IWA, and several mutual water companies and many small water systems mostly concentrated in the eastern Coachella Valley. The Indio Subbasin also provides for the water needs of domestic wells and private pumpers. CVWD and DWA must replenish the Indio Subbasin to supplement limited natural recharge that is much less than groundwater demands. Any additional demands on the Indio Subbasin must be carefully considered and mitigated through additional replenishment of imported water, additional development of recycled water, or future restrictions on water use.</p> <p>The Indio Subbasin is also the only one of the seven surrounding basins that is subject to SGMA. While Table 4-40 recognizes that the CVWD completed a water management plan in 2002, this plan has been updated several times to ensure that historical overdraft was eliminated and mitigated into the future. The latest update submitted to DWR in compliance with SGMA is the 2022 Alternative Plan Update.</p> <p>We therefore request that the Draft EA recognize and accurately describe the groundwater hydrology and beneficial uses of the Indio Subbasin, the 2022 Alternative Plan Update, and the requirement to sustainably manage this subbasin in a manner that mitigates overdraft and other undesirable results in accordance with SGMA.</p> <p>The section incorrectly refers to recharge areas associated with the Coachella Valley basin, rather than the specific subbasin. The subbasins in the Coachella Valley Basin, do in fact contain deep water bearing deposits.</p>	<p>Refer to comment responses 54-1 through 54-12 to Letter 54, from the Coachella GSA, which includes similar comments. Refer also to comment response 56-2.</p> <p>Commentor is likely referring to Table 4-50 (not Table 4-40) in the Draft EA. This is now Table 4-58 in the Final EA and has been updated. In addition, Section 4.16.3.4 in the Final EA (formerly Section 4.12.3.4 in the Draft EA) has been updated to state that wells in the Indio Subbasin are the sole source of drinking water for the communities of the Coachella Valley.</p>
56-22	8/19/2022	Letter	CVWD	<p>Page 4-123: Whitewater River</p> <p>It should be noted that other agencies such as Desert Water Agency, maintain diversion permits for tributaries to the Whitewater River, such as Snow Creek. Diversion Permits held by CVWD are for recharge and do not significantly impact the amount of water that would reach the Salton Sea before infiltrating into the Indio Subbasin.</p>	<p>Comment noted. Text with this information was added to Section 4.16.3.5 (Water Supply and Conservation and Water Rights) of the Final EA (previously Section 4.12.2.5 in the Draft EA).</p>
56-23	8/19/2022	Letter	CVWD	<p>Page 5-109: Effect Analysis</p> <p>The Project does not include an affects analysis for all alternatives regarding the use Salton Sea inflows and the potential impact to existing water conveyance facilities. Water conveyance facilities could directly and indirectly impact Agriculture, Land Use, Built Environment, Hydrology, and Aquatic Resources. It should be noted and carried out in the document sub sections these resource topics may be influenced by various alternative project actions and should be evaluated individually. CVWD would like to reiterate that any weirs, berms and other structures to divert water cannot have an elevation greater than the existing invert of the CVSC, its tributaries or agricultural channels and drains, without having a potentially detrimental impact. Unless water diversion infrastructure were temporary, these impacts could be considered permanent impacts despite a receding water body in the Salton Sea.</p>	<p>Refer to comment response 56-6.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
56-24	8/19/2022	Letter	CVWD	<p>Page 5-127: Effect GW-1 Project Implementation would have little effect on groundwater availability or quality</p> <p>The Draft EA concludes that the Proposed Project and Alternatives would have little effect on groundwater availability or quality. However, the Draft EA does not describe the use of groundwater with respect to location or amount making it impossible to evaluate this conclusion for the Indio Subbasin. The Draft EA must be clear and transparent about any amount of groundwater that would be extracted from the Indio Subbasin before drawing such a significant conclusion.</p> <p>Furthermore, we would like to express our concern that this conclusion, as it applies to the Indio Subbasin, is based on incorrect assumptions about the groundwater hydrology of the Subbasin. For example, the Draft EA states that: <i>Any groundwater applied for dust suppression and restoration features would typically be extracted from existing wells that draw from the deep aquifer and would not have a direct adverse effect to the shallow water table. In the future, if shallow groundwater is considered towards potential water supply for the Proposed Project, additional environmental review would be needed before the groundwater supply can be used.</i>(pp. 5-140 and 5-141).</p> <p>The project incorrectly assumes the use of well water for dust suppression and restoration projects is viable without further assessment. Please note the deep aquifer in the Indio Subbasin is not completely separated from the shallow aquifer, due to the presence of an aquitard rather than a presumed aquiclude. The hydro stratigraphy in the southeastern portion of the Indio Subbasin (East Coachella Valley) has the following characteristics:</p> <ul style="list-style-type: none">• A shallow semi-perched zone consisting of recent silts, clays, and fine sands• An upper aquifer with unconfined (water table) conditions• A semi-confining aquitard of fine-grained materials• A lower aquifer with confined and artesian conditions <p>The fine-grained materials of the semi-confining aquifer are not regionally extensive or thick enough to completely restrict vertical groundwater flow between the upper and lower aquifer zones. Similarly, although the materials in the semi-perched zone are of low permeability, conditions in the lower and upper aquifer can impact the shallow water table in this zone. A combination of rising groundwater and irrigation water applied to agricultural lands has maintained the semi-perched groundwater in the East Coachella Valley, necessitating the construction of an extensive subsurface tile drain system to reclaim these lands for agriculture. Deep groundwater pumping in the East Coachella Valley not mitigated by imported water replenishment impacts not only shallow groundwater, but also the agricultural drain flows that are a significant source of water supply to the northern Salton Sea.</p> <p>Any deep groundwater pumping, particularly extensive amounts or long-term pumping, could impact the shallow groundwater levels. No locations of the wells are provided, and no anticipated pumped amounts are available, making the assumptions on well use invalid based on a lack of proper analysis. Moreover, if the restoration projects are located in a different location or subbasin than where the water sources are diverted, effective groundwater recharge would not take place.</p>	<p>Language stating that the use of water from the deep aquifer would not affect the shallow aquifer has been deleted. Clarifying language has been added regarding use of the groundwater, and a new mitigation measure (MM GW-1, Coordination with Indio Subbasin GSAs regarding groundwater extraction from the Coachella Valley Basin) has been added to require coordination with the Indio Subbasin GSAs in this regard.</p> <p>Refer also to comment response 56-2.</p>
56-25	8/19/2022	Letter	CVWD	<p>Page 5-141: Effect WS-1: Project implementation would not result in any diversion of water supply from other beneficial uses and would not affect water rights</p> <p>Please correct Whitewater River with CVSC in regard to water sources providing inflows. This section also mentions recycled water as a potential source of water but is not discussed elsewhere in the document. CVWD believes this to be an error and should be removed from the document.</p> <p>Recycled Water use is a comprehensive and regulated practice that requires extensive planning and coordination with Water Districts for implementation.</p>	<p>CVSC was added to Effect WS-1 by indicating that it is a perennial reach of the Whitewater River.</p> <p>Recycled water is mentioned in several places in the Final EA in Section 4.16.2, 4.16.3.1, 5.16.3 (newly added based on Coachella GSA comment 54-3), and 5.16.4, mostly in the context of a water district (like CVWD) developing the recycling capabilities, not that CNRA would be developing recycled water resources.</p>
56-26	8/19/2022	Letter	CVWD	<p>Page 6-19: Hydrology/Water Quality</p> <p>Cumulative impacts to this resource section should be updated after the information provided in this letter is considered and addressed in preceding sections.</p>	<p>Refer to FEA Chapter 6, Cumulative Effects Summary, Section 6.13, Water.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
56-27	8/19/2022	Letter	CVWD	Page 6-20: Water Supply and Conservation and Water Rights Given the Indio Sub basin groundwater resources provide the primary source of domestic drinking water to the Coachella valley, cumulative impacts to this resource section should be updated after the information provided in this letter is considered and addressed in preceding sections.	Refer to Sections 3.17 and 5.16.4 of the Final EA. The use of groundwater for some projects may be considered from some of the seven groundwater basins surrounding the Salton Sea that are either not used for drinking water or are not subject to a GSA agreement. In particular, the Proposed Project and alternatives would not use groundwater from the Indio Subbasin without coordination with the applicable GSAs (and therefore, would not affect domestic drinking water supplies in the Coachella Valley) and, consequently, no impacts or cumulative impacts to the Indio Subbasin would occur.
56-28	8/19/2022	Letter	CVWD	Page 8-1: Coordination If groundwater is to be utilized for the Project from the Indio Subbasin, coordination should be inclusive of Groundwater Sustainability Agencies (GSAs) who are required to manage groundwater under SGMA. Please reflect these GSAs in Chapter 4, table 4-43. The GSAs of the Indio Subbasin are the CVWD, CWA, DWA, and IWA, who coordinate with DWR, and SWRCB for SGMA implementation.	This information has been added to Table 4-51 (Regulatory Requirements for Water Resources) of the Final EA (formerly Table 4-43 of the Draft EA). Additional discussion of water availability and water agreements is provided in Section 3.17 of the Final EA.
57	7/7/2022	Transcripts: Public Meeting-Day	Mariela Loera	So again, my name is Mariela Loera, I'm with Leadership Council for Justice and Accountability. I just first wanted to say thank you for this meeting, and the summation of the document. And, my comment will focus on the fact that residents, as well as community based organizations, have been advocating for the inclusion of more community amenities that fit local community needs, far beyond things like recreational activities. Like I know it was mentioned things like trails, picnicking, birdwatching. But far beyond that, include things that will provide more benefits besides public health, including things like climate (Inaudible) and projects like community gardening. So, we highly encourage that this process be used as a tool, to ensure that there's language that includes those types of amenities in the projects discussed in the SSMP. Thank you.	The purpose of the Proposed Project is to create projects that provide fish and wildlife habitat and suppress dust (see Section 2.0, Purpose and Need of the EA). Public use activities are included to the extent they are compatible with the purpose and need of the Proposed Project, and may include picnicking, hiking, birdwatching, non-powered watercraft use, and hunting. Community gardening is outside of the scope of the SSMP 10-Year Plan and therefore is outside the scope of this EA.
58	7/7/2022	Transcripts: Public Meeting-Day	Daniel Polk	Okay, great, yes, thank you so much. My name's Daniel Polk, I'm with the local non-profit Health Assessment and Research for Communities. I have two comments. One is to add to what Mariela was saying, just the importance of considering the political economy of this local region, and to be sure that whichever project is chosen, that it provide some means for local jobs. Whether that be tourism, or anything else. My second comment is more of a question. I'm wondering whether these proposed projects consider the possibility of floods. I know for example in 1976 and '78, there was two large tropical storms that caused large scale flooding in the region. And, so what mitigation efforts are being considered, to make sure that these projects can withstand possible flooding?	Refer to comment response 57 regarding public amenities. All project-related structures (e.g., berms for aquatic features) would be constructed to current building codes.
59	7/7/2022	Transcripts: Public Meeting-Day	Nikola Lakic (1)	Thank you for this, greetings to everyone. Thank you for this opportunity to say a few words. What I have seen right now, it's disappointing, I'm sorry to say. But all those projects and processes that has been described, it leads to the destruction of the lake. You need to ask yourself what is the final product of the small earth sustainable lake, and all those dust suppression project? Well, it's lead to the smaller sustainable cesspool. The lake will be smaller, saltier, smellier, and more polluted. Now, it's also ignoring the importing of sea water completely. Now, why so I'm not sure, but the panel of the independent reviewers are reviewing that in this very moment, and they will have I believe analogous final vote about that. I can ensure you that importing sea water is feasible project. And, if that, if panel decides that it is feasible project, then the question is what are you going to do with all those project, what you are proposing right now, dust suppression, and wetland? They'll be flooded. So, I am suggesting a radical change. I will, I intend to send a comment before, before the 21st, I believe, 20th is it, this month, and substantial letter. Please pay attention on it. It's very, very important. We had to take out of equation ego, prestige, and some people pushing for this current course of action. We need radical change, and we can make fantastic (inaudible).	The SSMP 10-Year Plan projects are being developed to meet the targets defined in the SWRCB WR 2017-0134. Refer to comment response 6.

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60	7/7/2022	Transcripts: Public Meeting-Day	Christopher Green (1)	I just wanted to say thank you for this opportunity, and for everybody being here, and collaborating on this space that we love so much. It's of great importance. A few things have come to mind. I'm currently a resident of Bombay Beach, and seeing some of the implementations that have been happening, and from my experience especially with the, there was a specific name for the suppression of the wind, or mitigation of it, with either digging things, or putting up barriers. And, from my experience what I've witnessed is when the wind patterns are disturbed, or turbulence if you will, is added, it actually kicks up more dust. So I'm sure there are more steps coming to mitigate this, although this is something that I've noticed, and that particularly there's like mass amounts of straw bales surrounding the town. And, not to mention fire danger, as well as I've heard many comments of people with allergies. Now that there's hay in the air, it's causing worse problems than potentially it was to get in the beginning. So, just things to consider. I would love to see more information or awareness for the communities. The particulate, I'm sure there is multiple air quality meters that we could be receiving data from so we would know. I know some of the neighboring towns, especially the schools have systems in place. When the air quality is below par, they're, you know, keeping children inside the schools and whatnot, and taking preventive measures. And, from my understanding, the general populace doesn't necessarily have access readily to this information. I would also love to see the differentiation between previously the air quality and the particulate matter, as well as now, after the straw has been introduced, to know those data points.	The installation of straw bales (not hay bales) is a method for the suppression of dust on the exposed lakebed. Air quality monitoring stations have been installed at 6 locations around the Sea but are intended to measure particulate matter (dust) in the air, and no other types of pollutants. In addition, these monitoring stations are not tied to the local air quality districts (South Coast Air Quality Management District and Imperial County Air Pollution Control District) for purposes of public health alerts.
61	7/7/2022	Transcripts: Public Meeting-Day	Karina Quintanilla (1)	I've been a resident of the Coachella Valley for nearly 40 years. We came here to the valley because my asthma was very severe. In those 40 years I've seen a lot of changes, and I think that there's a lot of unseen factors, such as the impact on school budgets, when they're not getting the amount of attendance allotments. So beyond that, I echo the support for community gardens, and job training that will come with it. But I want to also look at what specialized jobs are needed, and how we can put that into the infrastructure. I think we need to have more transparency. I have been unable to get the UCSB studies, even under the Freedom of Information Act. I keep hearing a lot of the same ideas and want to know, what is the exact timeframe for implementation, and how many of these are budgetary delays? And, what is the hierarchy of priority of the proposed solution? It is based on what is already funded? Is it based on community need? And, I think that there is a lot of great work that's being done here. I appreciate that this is a continual effort. The discussion keeps evolving, and at least I'm happy to see that the overall solution is, is being considered. That it's not just one component, but that we have to restore a healthy ecology to, to bring this up to, up to vision. However, what's under the surface is still very dangerous from all of the microbes. I was shocked to find that there are even fungal particulates that adhere to some of the, the dust on the playa, on all of the microparticles. And, that becomes airborne. And we are not even aware of it. Our doctors aren't even aware of it, so then we result in an over prescription of antibiotics. So, all of the public health consequences that have a ripple effect that we're not even seeing. So, I thank everyone that's here for their time, and their interest, and their work, and say we've got a lot to do, but we need to look at this from all of the ways that include infrastructure, and education.	<p>The State's SSMP 10-Year Plan aims to improve conditions around the Salton Sea by constructing projects that create habitat and reduce dust from exposed lakebed on 29,800 acres by 2028. The State's implementation of habitat projects started in 2020, with the first major habitat project, the 4,100-acre Species Habitat Conservation (SCH) project (authorized separately), currently under construction. Efforts to reduce dust also are in various stages, with more than 1,600 acres of interim dust suppression projects completed from 2020 through 2023, approximately 700 acres of vegetation enhancement installed in 2022 and 2023. Several other projects including the North Lake Demonstration Project (160 acres), Audubon California's Bombay Beach Wetland Project (564 acres), and Desert Shores Channel Restoration Project (30 acres) are in development. Additional information including funding strategies are outlined in the State's 2024 annual report available at: https://saltonsea.ca.gov/wp-content/uploads/2024/03/2024-Annual-Report_Mar-25.pdf</p> <p>Regarding the hierarchy of priority, the State SSMP Team is prioritizing work to secure land access in areas with the highest emissivity potential to construct additional projects in strategic locations along the perimeter of the Sea. The SSMP Team also continues to prioritize implementing projects on lands where the State has secured site control and has access to water rights, while it also works to develop and consolidate land use agreements to facilitate project delivery, as implementation timeline is depending on securing land access.</p> <p>Also, refer to comment response 56-5.</p>

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62	7/7/2022	Transcripts: Public Meeting-Day	Stephanie Martin	Well, I think I would like to comment about just how important this 10-year phase one plan is, I believe. And, I think the community need that is being prioritized in this document, is the air pollution and it will, you know, theoretically be addressed, which is the biggie here. And, I understand Karina's comments why isn't infrastructure and education, and being talked about in this short-term plan. And, I kind of understand it to be because it is habitat, and dust suppression based. My question or comment because of that, or on the heels of that, as well as to echo kind of Nikola's comment why you all are ignoring water import, I'm kind of wondering how this is chronologically going to tie in together into the big picture. So here we have the, my understanding is this is a short- to mid-term range. And, then we have the long-range plan, which should obviously kind of match the goals seamlessly so it's all working together, and not at odds or ends with each other. So I'm just kind of wondering how we're going to tie this all together and but I'm excited. I'm along for the ride and I'm trying to be active and try to think and brainstorm about, and but that's kind of what my confusion is. I don't know if it's just me, but I did hear a couple of things, and then the other common confusion is to the community needs. Yes, there is a lot of poverty and things like that in the area as well, but the community need that will really get us off the ground, is addressing the air pollutants. And, I think that's what we all need to focus on.	Refer to comment responses 41-17 and 55-3.
63	7/7/2022	Transcripts: Public Meeting-Day	Frank Ruiz	I am the Salton Sea Program Director for Audubon California, and I want to thank you for all your efforts in presenting your analysis. My question is given the current drought conditions and more inevitable water reductions coming up, were you able to formulate a water calculator for each of the aquatic, and wet habitat projects alternatives you have identified? Without water security, it is going to be impossible to create these projects in a way that can become sustainable in the long run.	Refer to Appendix C (formerly Appendix F in Draft EA), which has been revised in the Final EA to include additional modeling results and to present the water demand by individual project component and alternative. New Table 3-7 in the Final EA summarizes estimated annual water use and source of water for each project and alternative.
64	7/7/2022	Transcripts: Public Meeting-Day	Felicitas Nunez	I am a retired registered nurse. And, listening to all of the projects and the requirements for permits, I think this is going to take just too long. Already we have witnessed the killing of fish and wildlife. And, with the endangered species that we're so concerned about, it's they're dead. Now, the other endangered species that we have coming up is children, and elderly people especially that are living around the, the Salton Sea area. And, with the dust being shared and not being discriminatory, it's going to be going all over for a radius of 150 miles. When I, I've never heard about the Army Corps of Engineers before, but to me, prolonging this, this attack on the health of the residents and others, it's, it's like an invading army coming from the outside. When I heard about the Army of Corps, the Corps, so that I figured that they were here to protect us. And, I am hoping that they consider importing water, because that's what's going to stop the dust. That's what's going to start the cleaning of the air. And, then we have to start cleaning the water. We have proposals for water importation that contain making desalination potable water, and starting to clean up our, our environment. And, I'm hoping that the Army steps up to what it's supposed to do and protect the public from, from the invasion of either armies from the outside of the nation, or pandemics coming from everywhere, and germs that we are building in our own environment.	Refer to comment responses 41-17 and 55-3. Under a separate authority, the Corps in partnership with the State of California and the Salton Sea Authority has undertaken to prepare the Imperial Streams and Salton Sea Aquatic Ecosystem Restoration Feasibility Study [information is available online at https://www.spl.usace.army.mil/Portals/17/docs/PLACEMAT%20SALTON%20SEA.pdf].
65	7/7/2022	Transcripts: Public Meeting-Day	Christopher Green (2)	I just wanted to, and I guess maybe this isn't like a question scenario, although I've heard multiple people mention water importation. I just know that there's multiple resources in the area that are also organizing for the geothermal and lithium, and they have [also discussed] water importation. And, I just think to, I'm sure you guys have bridged the gap although I haven't heard it mentioned, about working in collaboration with those resources and committees that are established, also discussing about importing water. And, feeling that with those combined resources, this, this could definitely be feasible. And, just wondering what, if any, possibilities are in that direction. And, that was just what came to mind.	Refer to comment responses 6, 39, 55-3.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
66	7/7/2022	Transcripts: Public Meeting-Day	Nikola Lakic (2)	But just to build up for the gentlemen said Christopher in front of me, the current course of action consists of two main project. One is harnessing lithium from geothermal brine, which is based on smaller sustainable lake, and exposit playa. Second project is restoration of the Salton Sea, which is based on importing sea water. Those two projects are in conflict, in serious conflict. There is no reason to continue with smaller lake if we are to import sea water. Now, the argument can be well, we are going to continue with smaller lake even if we import sea water, but somehow, and then we will continue with the dust suppression project. It does not make sense, people. If you are going to import water, we have to restore it to the level of 1950s and 60s; restore beaches to introduce vertical circulation taking water from the bottom brine, and importing less salty sea water. So, in 4-5 years, we can, we can equalize salinity of the Salton Sea with the salinity of the, the ocean. There is proposal. Please be patience. Include, read those public comments. Again, I intending to, to send public comment before deadline. My question also is I know that there's another meeting this afternoon. Is going to be same, or I need to repeat myself? Or I know there is one in a few days also.	Refer to comment responses 6, 39, 55-3. The question regarding whether to attend subsequent meetings and repeating comments was answered during the meeting as unnecessary. All comments from meetings and written comments have been cataloged and responded to in the Final EA.
67	7/7/2022	Transcripts: Public Meeting-Day	Yolanda Cisneros (Facebook page)	Comment reads, need the same for North Shore, California, zip code 92254, as we are affected in the same way. Second comment . . . , it is already very dry on the 111 side here in the North Shore, and I have 20 years, I have 20 years living here and I've been really sick lately, and even more bad because of dust coming out from the lake. And, smell produces a lot of allergies.	Comment noted. Minimizing dust emissions and thereby minimizing public health issues, is one of the objectives of the SSMP 10-Year Plan.
68	7/7/2022	Transcripts: Public Meeting-Day	Chuck Parker	Well, I wanted to ask if the Army Corps in their evaluation, is taking into account the drought that's going on, and the inevitable cuts in water availability. Because I was really, I've been and going to a lot of these meetings. I'm a member of the long range planning committee. I'm a community member with the Salton Sea Coalition. And, these numbers from the various alternatives, I was astounded that they're claiming that they can build, anyone is claiming that they can build aquatic habitat in the range of 25,000 acres. Where is the water going to come from, would be my question. And, the other question is two questions. Yesterday at the long term planning committee meeting, James Newcomb, from the State Water Board, said that after the long range committee makes a recommendation about the long-term plan, then they will turn it over for a NEPA and a CEQA evaluation. And, that's the first I've ever heard of that. Does that mean that after the long range planning process comes to an end, then we're going to enter into another lengthy environmental review or two? And, is the Army Corps of Engineers going to be involved in that? And, it would be very discouraging to think that we're going to, we're in for another, I don't know, two, or four, or five years of review, and what level of review will come after that. And, I think rather than give lithium developers a break on their environmental requirements, we should give the Salton Sea a break. And, the last thing is I would like to ask you guys if you're doing anything, or having any evaluation, regarding public health. Because last night that was a very good presentation by UC-Riverside. And, their basic thing was to protect people, we have to eliminate the dust number one, and provide sick people with care. And, it doesn't look like we're doing very well on either of those things.	Regarding drought and water availability, please refer to revised Appendix C in the Final EA (formerly Appendix F in Draft EA), which presents water demand by individual project component and alternative. All projects in California are subject to environmental review prior to implementation to ensure that decision-makers have the information needed to make informed decisions regarding potential environmental impacts associated with a project, and that the public has an opportunity to provide comments on the environmental document and the project. Under a separate authority, the Corps in partnership with the State of California and the Salton Sea Authority has undertaken to prepare the Imperial Streams and Salton Sea Aquatic Ecosystem Restoration Feasibility Study [information is available online at https://www.spl.usace.army.mil/Portals/17/docs/PLACEMAT%20SALTON%20SEA.pdf]. Minimizing dust emissions and thereby minimizing public health issues, is one of the objectives of the SSMP 10-Year Plan.
69	7/7/2022	Transcripts: Public Meeting-Day	Karina Quintanilla (2)	My comment goes back to reiterating the need to understand who will be implementing these projects. What is the specialization that these individuals will require; the training; is this something that we can have our local workforce apply; and, when are these things expected because we need to be able to provide the labor demands. And, also I'm thrilled that the PowerPoint will be available and was wondering if within the PowerPoint, there are links to be able to get to some of the studies because some of us, you know, are nerds and like to look at methodologies, and look at the control models. And, I think that that would help policymakers and community leaders like myself, I'm a council member in Palm Desert, to have the better understanding of what we can support, what we can do, and what kind of information to present and, and give a voice to. I'm very passionate about the Salton Sea and the regional impact, not just impact to the Coachella Valley, and the impact across Southern California. So I know there are a lot of people that have a close watch. And, here in the valley, we need to look very specifically at the micro analysis to our community. And, I think that to Chuck's comments yes, there are a lot of factors that are being neglected. And, I hope that maybe somewhere in the, in the links or the PowerPoint, there can be a link to UCR's two-day symposium, which had excellent and extensive information about the impacts. And, I'm not sure how those two can be linked, but it's very valuable information to give to the public that's interested. And again, all of the policymakers involved.	The PowerPoint is available online at: https://www.spl.usace.army.mil/Portals/17/docs/regulatory/Projects/SSMP/SSMP-10-Yr-Plan_Public-Meetings_Slideshow_Eng_Esp-Translation_Corps_Jul-2022.pdf?ver=_Cpj-exRAqm4syR89UHNDQ%3d%3d

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
70	7/7/2022	Transcripts: Public Meeting-Day	Nikola Lakic	Thank you for third opportunity it's I'm grateful to have few opportunity. Usually just three minutes, two minutes or cut it off. And, again, I just want to reinforce the statement that the base, the current course of policy is based on four false assumption that the imported sea water is not feasible project. And, everything else we are building something on false foundation, or on it's not solid ground. So please consider that and do your job. The Corps should really be a referee and protector of the population, and the climate, and everything. There is so many proposals all around, including myself that everybody's pushing, [believing] it's their project is the best. But we need a referee. We need judge. And, I'm hoping that panel will do that. And, also the Corps and EPA, and will protect people and environment. So, I know there is people who are pushing for destruction of the lake. I'm sorry to say for the destruction, and it's horrible. But that's what it is. If we are ending with a lake that is going to be smaller, saltier, smellier, fish is already dead, well, it is destruction of the lake. Alternative is to import sea water, to prevent pollution, redirect new river, (inaudible) river back to the Sea of Cortez, and then we can have North Lake, South Lake, (Inaudible) Century, beautiful tourism. And, we can deal with the, it's in harmony with quantification settlement agreement. So please review all papers that will be sent, I intend to send in.	Water importation is outside the scope of the SSMP 10-Year Plan and therefore outside the scope of this EA. Proposals associated with water importation are under consideration as part of the Long-Range Plan. The SSMP 10-Year Plan projects are being developed to meet the targets defined in the SWRCB WR 2017-0134 and will provide benefits in the near-term while the Long-Range Plan projects are under development. The Long-Range Plan projects are intended to complement the SSMP 10-Year Plan projects.
71	7/7/2022	Transcripts: Public Meeting-Day	Christopher Green (3)	Hello, thank you. I just wanted to mention that I keep hearing you guys saying you're posting links in a Q&A section, although I am unsure of how to reach those. I see a Q&A button although it just gives me the option ask a question. I also wanted to say thank you to everyone that's contributed. I especially love Nikola's spirit, and attitude. I would love to collaborate further. Besides being a resident of Bombay, I'm currently the chief organizer of the fire department, and so I have as an expressed interest as anyone else. So, please if anybody's interested, I would love to collaborate and presenting further opportunities or options, and just thankful for all who are present here.	Comment noted. Link to the proposed LOP Procedures and draft EA is https://www.spl.usace.army.mil/Missions/Regulatory/Projects-Programs/ . Link to the Public Notice https://www.spl.usace.army.mil/Media/Public-Notices/Article/3066981/spl-2019-00951-kjd-salton-sea-management-program-phase-i-10-year-plan/ .
72	7/7/2022	Transcripts: Public Meeting-Night	Nikola Lakic	I spoke few times this morning, and I am very pleased for that. Now listening second time presentation, it clarify even more. I am Graduate Engineer, Architect. Let me say just one short I graduated in 1982, nine semesters associate Phonetic) exam plus graduate work for five, six months, and I graduated with ten out of ten. It's very rare at that time, or even now. But I distinctly urge EPA and courts to be, to fulfill its past to be objective, to take care of environment and health of the people, and it should do that. Then radical change is needed. What I am seeing right now, again, it's clarify even more there is no proposal, feasible proposal. All that is smoke and mirrors right now, just the (Unintelligible) final product is going to be losing lake. Lake is going to be smaller, saltier, smellier, and polluted. All these projects that are talking about are excluding import of sea water. On the panel, panel of reviewers right now, is that1 they're reviewing importing fuel. It would be wise if we can wait for that and see if there is such thing, and then talk about master plan that we can do something. This is not time for me to speak about my proposal. I intend to make public comment before deadline, of course, and I hope that you will be objective and that you can officiate like, fulfill your task.	Refer to comment response 70.
73	7/7/2022	Transcripts: Public Meeting-Night	Chris Cockroft	I wrote a letter to you guys back in the comment period before, concerning the fact that you had neglected to talk about filling the lake up, and thereby having an alternative . . . So I wrote a letter to you suggesting that an alternative be presented that would talk about filling the lake up to the minus 227 level, which goes along with the goals of the state when it was starting this process to restore the Salton Sea to its preexisting condition. That was in the mix for a year, and in this graph alternative that you have right here, there is no mention anywhere of that alternative. You have completely left it out. And by law, when you leave out a viable alternative, you have to redo the report because you didn't include something important. Filling up the lake to the minus 227 level will take care of all the problems. Not only the dust problems at the shoreline, but it will take care of the entire problem for the whole lake. It will also provide environmental protection for the birds, and it's a lot cheaper than any of these alternatives. It occurs to me, furthermore, that by neglecting this, you open yourself to legal efforts to overturn it on that basis. I also think that, perhaps, Mr. Brown, we wrote this report for you as well. I saw his name in the credits, as well as some other people from (Unintelligible). Those people wrote all the reports from the state, and they are biased. They excluded this possibility in this report by saying that the 10-year plan was different than the long-range plan, and therefore they're only including these alternatives. That is not legal. You need this alternative in your report before you do it. You need to redo the report to make an accurate summation of this product as well.	A response to your comment during the public scoping period for the EA was included in Appendix A of the Draft EA (see response to comment 10 of that document) and is applicable here. Refer to comment response 6 re: water importation.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
74	7/7/2022	Transcripts: Public Meeting-Night	Nikola Lakic (2)	Just to build on the gentleman before me, public comments about opening a legal problem , it's true. My proposal exists since 2013, and was suppressed intentionally by Salton Sea Authority, IID, Tetra Tech, and the Pacific Institute. This proposal was right now that Tamara Klug was making presentation. It's1 typical, it's (Unintelligible). It's something that's been around for quite a long time. People, please understand, it does not make sense. We have, it's comprehensive design. We need master plan, and then we can build on it. Right now, we are talking about permits on some small projects around, and there is no spine, there is no foundation, there is nothing to follow. A final product is going to be losing legs. It's not working, the losing time and money, and now, to follow 10-year plan, it means 2028, another six years losing it, just to follow to save some of the ego and wrongdoing. We have to make radical change. If my proposal is accepted next month, you will see from panel, I hope I will have platform two, three, four hours. It's a comprehensive design dealing with importing seawater in a special design, devising lake on three segments. Harnessing solar energy, harnessing geothermal energy. All that is substantial material that is not something I can say in two minutes, or 15 minutes, or one hour. I did make presentation in front of California Energy Commission. In my comment, I will link to that. It's one hour. You should see that. It's something that should not be ignored.	Comment noted. Any proposal associated with importing water, and decreasing salinity and pollution is outside the scope of the SSMP 10-Year Plan and, therefore, is outside the scope of the EA analysis.
75	7/7/2022	Transcripts: Public Meeting-Night	Ronni Hewitt	I just have one question. You're building all these ponds around the lake during the restoration for the fish and birds, but the sea has so much salinity. Where are you going to get the water? Because it's uninhabitable for the fish, so where are you going to get water for the fish, for the ponds and stuff? They can't use the seawater. I haven't heard that from any of these, anybody yet. And I'm done, I just want that question answered. Where are they going to get the water for the ponds in all this restoration?	As described in Section 3.3.1 (Aquatic Habitat Restoration Opportunity Areas) of the EA, the proposed aquatic habitat ponds would incorporate water from outside the Sea and saline water from the Sea in amounts that provide salinity ranges to support fish species not able to survive in the increasingly saline Sea. The primary water supply for the ponds would be a combination of brackish river water and hypersaline water from the Sea.
76	7/7/2022	Transcripts: Public Meeting-Night	Chris Crockroft (2)	I just wanted to say that I think the Corps of Engineers made a mistake when it picked Tetra Tech to write this report. Tetra Tech has accepted a large grant. Six or seven years ago, they produced the FFAD, which was the oldest iteration of Mr. Brownlie's idea for a perimeter lake. Everything in this current document echoes that, right now. We could have an ongoing argument about it, between the people who are trying to work to restore the sea, all of us who are involved in the Salton Sea. Mr. Brownlie has consistently taken this position, and now he's created a bunch of supposed distinct ideas, which are really all kind of rehashes of his side of the story. He has never, even at the beginning in that FFAP, Financial Action Disability Plan, was paid for by the state. They got, Tetra Tech got a million dollars to write that plan, and they never mentioned sea water there. And in this particular iteration again, they've done the same thing to you guys. So by hiring them, you've put forward one side of the story, but you have not looked at the other alternative at all. And it's not in your report right now, your draft report, and it really, really needs to be, so that each side can have a voice in the outcome of this final report.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
77	7/7/2022	Transcripts: Public Meeting-Night	Nikola Lakic (3)	<p>Thank you very much for this third opportunity. . . First, we have to stop pollution. What is pollution? Pollution is new river and (Unintelligible) which are run-off water from nearby farmland. How we can do that? We can redirect that to the Mexico on the border before it get polluted by fertilizer and pesticide, to refill Laguna Salada, establish new body of water, reestablish a flow off bank in Sea of Cortez and marine life, and (Unintelligible) and dolphins, they would love that too, because last hundred years they don't receive a drop of it. So to stop pollution, then we need to be wide lake on three sections, north lake, south lake, and we can handle that with farmland north of the lake farmland and north lake, we can handle it by water from Coachella Canal. Imperial County and south lake, we can manage with all American canal, and that is in harmony with quantification settlement agreement. Central part, we don't need to worry anymore. Now we can bring seawater from Sea of Cortez and one corridor to Long Beach, so we can have exclusive real estate, clean environment, between 500 million and one billion revenue just from energy, not to mention tourism. So it is something that, please, consider, don't ignore it. It's very, very important.</p> <p>But I would like just to add that in my proposal, by importing sea water and giving away new river and (Unintelligible) river, we save 50 million dollars. That's how much we would have need to pay if you want to import seawater. By giving them same amount to refill Laguna Salada, or if there is issue with that, then we can go straight down following some stream in (Unintelligible). In that case, we don't need to pay 50 million dollars a year for one million acres (Unintelligible). That's one thing. Second, by importing water from Sea of Cortez and another corridor from Long Beach, we will have, some people say well, that's another few billion dollars extra. With my proposal we will have several billion dollars revenue every year. Well, at least one billion, but we are talking about energy, there will be tourism. So we can allocate another few billion, billion and a half, because we will have that product. Because if you have just import with one corridor, then lake is 35 miles long, water will be stagnating on another end. By adding two corridors, we will have good condition for tourism, for everything. Secondly, if we have just one corridor, then could be (Unintelligible) Mexico, cartel might take over, they might blackmail us asking for 100 billions instead of 50 billion. So it's good to have two options. Again, for importing seawater, people say water drink with salt in order the salty lake. I am producing (Unintelligible). I can take salty water from the bottom. Salty water has a tendency to go to the bottom. I am taking that water out, (Unintelligible) and bringing less salty water from the ocean. So we can equalize salinity of the Salton Sea with the salinity of the ocean in a few years.</p>	Refer to comment response 70. Any proposal associated with importing water, and decreasing salinity and pollution is outside the scope of the SSMP 10-Year Plan. In addition, Laguna Salada is a dry lakebed in Mexico and is not part of this project.
78	7/7/2022	Transcripts: Public Meeting-Night	Nikola Lakic (4)	<p>With my proposal, I am producing substantial amount of potable water as a free byproduct using solar energy and geothermal energy. So I am taking salty water from the bottom of the lake, just to finish what I didn't finish earlier. Salty water has high density, and has tendency to go to the bottom. I am taking from the bottom, using in my design geothermal power plant, producing electric energy and condenses as potable water. Remaining water in boiler become much saltier, concentrated. I am using that water for extraction (Unintelligible). So that's in addition to extraction of lithium from geothermal brine. People say, well, what are you going to do with salty water from the ocean coming in all the salty lake? I admit it. We can make about a thousand tons lithium just from importing seawater from the ocean every year. It's not some huge number, one thousand tons, but it is something. And I can use that technology from San Diego to Vancouver, and all east coast, using solar energy. With my system I have over 30 patents on this issue. I have even patents for dividing lake in three sections. Even north lake is using my patent, but I hope will not need to go into court for it. I hope that common sense will prevail, and that will be taken care that Corps and EPA will be objective to take care of the environment and the health of the people. If that is done, then we will be in business and we can save Salton Sea and be very successful and productive and we can compete with Newport Beach, Huntington Beach. My design has several piers with restaurants on that dividing lake.</p>	Refer to comment response 70. A proposal associated with importing water, and decreasing salinity and pollution is outside the scope of the SSMP 10-Year Plan. In addition, a geothermal plant is not part of this project.
79	7/7/2022	Transcripts: Public Meeting-Night	Tom Sephton	<p>What analysis did the Army Corps give to the challenge of bio accumulation and water column accumulation of selenium in the habitat projects that are underway and proposed under the Salton Sea Management Program, and what assurance can you give us that the analysis of that potential issue is adequate and that adequate plans are in place to deal with selenium accumulation when it happens?</p>	Selenium is addressed in Effect HAZ-8 (Selenium and DDE levels in ponds could cause increased selenium and DDE levels in sport fish and waterfowl using the ponds) and potential changes in concentration in constructed ponds would be identified and addressed through MM BIO-2 (Targeted selenium monitoring of herbaceous wetlands where source water is from agricultural drains).

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
80	7/12/2022	Transcripts: Public Meeting	Jim Sullivan	We're land owners and we're sportsmen that have an area immediately adjacent to the Salton Sea. Our concern is that as these projects, whether it's one through five, are constructed and then maintained over the years, that the roads for maintenance would be open to the public unlimited. We would not like to see that because it would allow for harassment of the birds and would not allow for resting and maintaining their pattern as they migrate through. What our suggestion is, is that the roads be limited, they be gated, and that access be somewhat limited to maintenance in the future. I don't know if that's already a part of the program or not, but it's something we would certainly hope the agencies would consider.	The following language has been added to Effect BIO-8 (Project construction and operation would have minor effects on common fish and wildlife species) in Section 5.4.2 of the Final EA to address this comment: "In addition, maintenance roads could serve as access for the public which may allow for harassment of birds and other wildlife. Therefore, projects sites will be gated or designed to limit public access where such access is not appropriate. Areas will be designated to the public as open or closed to minimize wildlife effects."
81	7/12/2022	Transcripts: Public Meeting	Nikola Lakic	Now, regarding this, it's obvious that you people completely disregarded import of sea water, and as a federal agency, it's not good. You should be objective and see all option. We had a panel of independent reviewers who are just reviewing that option, importing of sea water. Now, there is pressure. There is people who want to get rid of lake. I'm sorry to use the word rid of the lake or destruction on the lake, but that's what it is. If you have a lake that is going to be smaller, saltier, smellier, and ended up as a cesspool, that means destruction of the lake.	Refer to comment response 70.
83	7/12/2022	Transcripts: Public Meeting-Night	Tom Sephton	The link to the draft environmental assessment, both on the Salton Sea Management Program website, on the materials emailed by Melinda Dorin several days ago, and on the link that was put by Josh Zipperman in the Q&A tonight, is broken, so how can we access the draft environmental assessment in order to review it thoroughly? Thanks.	Links were provided during the meeting. The Draft EA and appendices are available at: https://saltonsea.ca.gov/2022/08/army-corps-of-engineers-extends-public-comment-period-on-draft-environmental-assessment-to-august-20-2022/
84	7/12/2022	Transcripts: Public Meeting	Jasmym Phillips	I'm a Salton Sea resident. My comment today is in regards to using some of the existing lagoons around the Salton Sea in this ten-year plan that the Salton Sea Management Program is creating. I believe it's important to use these already existing lagoons at the Salton Sea State Recreation -- (Audio interference) -- North Shore Yacht Club because they already have better -- (Audio interference) -- better water quality. They already have an inflow, so there's going to be no new water required, and it's already used as fish and bird habitat, but it's kind of limited right now, and what I would like to see the state do is to really utilize these existing lagoons to their full potential. There's all of this urgency to build projects and maybe these smaller projects don't stop any new dust, but there are virtually ready to go habitat projects with minimal construction of berms. They don't require a new water source because they already have an existing inflow. They just need some TLC. So, again, even though the acreage is small, the impact would be especially big for wildlife, but also the locals and visitors and tourists that come to the area. This particular area up in North Sea and the Salton Sea State Recreation Park is very popular, and I think that these are also projects that could be implemented quickly.	Comment noted. As the Salton Sea recedes, some of these existing lagoons will also become isolated and may dry up if they are not actively enhanced or created.
85	7/12/2022	Transcripts: Public Meeting	Cesar Beltran	I am the president of the Comunidad Mayor Indigena Cucapah in Mexicali, Baja California. We are the owners of the land that's being used or projected as the canal that's going to bring water, so water to the Salton Sea. We've been working on this project with several companies for at least six years, and unfortunately, these companies have been using the community's name without our permission and other companies have been presenting documents that have already expired, and some of them have even been banned from the community because they are using the name of the Cucapah for their projects and to try to establish a possibility to bring water to the Salton Sea. I know that you presented a project within the Salton Sea in California. It's part of the ten-year project. Nevertheless, we are looking forward to working hand to hand with everyone involved in the project, but with the respect and with the formalities that are needed in order for our community to be part of this project. And also, I would like to ask you again who can we contact in order for us to be more, to be directly part of this project? Because we have found out that some of these companies have asked for resources on behalf of us, and unfortunately, we haven't been part of all of the decision making.	Refer to comment response 27-3.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
86	7/12/2022	Transcripts: Public Meeting	William Stenlund	All right, two minutes is kind of short, but I spent about a year and a half, ending about five years ago, on a project for water of the Coachella Valley. So, with two minutes, I'd just like to review or just say what the topics were that I wrote about. Maybe you could pick one and then I'll read what I briefly said about it, overview, Salton Sea, aquifer, Colorado River, desalination, seawater pumping, U.S. Army Corps of Engineers, golf courses, geothermal energy, drought, administration, funding, Agua Caliente Tribe inclusion, and then plan details. And by the way, I'm retired from being a compliance director in the securities industry. So, if there is one topic that you'd like to hear about, I can read -- I was asked to be very brief when I first prepared this, so each topic is like one page, eight and a half by 11. . . . The Salton Sea, in its heyday, was a prime recreational destination, enormous marine habitat, and served as an important -- (Audio interference) -- stopover, and supplied nutrition for (inaudible) for the -- this is, by the way, five years ago that I wrote this, for the -- (Audio interference)	Comment noted. Remainder was inaudible.
87	7/12/2022	Transcripts: Public Meeting	Nikola Lakic (2)	First of all, the address, I said that. Can I have a recording of these three days' letter is another question? Also, ten-year plan, completely, right, we spoke about it. Well, in previous meetings, also it's important to say, that two plans right now, I'm going to repeat it, extraction of lithium which depend on the smaller, sustainable lake that you, it looks like, accepted as normal, and the plan about restoration on the Salton Sea, which is in process, and the main component of that is importing seawater, a really serious disconnect. And I do have a plan. It's too premature to speak about that if you didn't see it. It's a comprehensive design and it's five segments each of them, maybe a one-hour presentation, and I hope one day that I would be invited to make one presentation one afternoon. It's important that you understand all aspects of that. It's a comprehensive design. It's not something to take lightly. Any year that my proposal, implementation of my proposal is postponed or delayed, we are losing about half a billion dollars' revenue. So, if you are to fulfill a ten years' plan, it means we have to wait until 2028. It's absolutely lost time. I'm respectfully suggesting you to wait until the report of the panel of the independent reviewers and only then to make some decisive decisions on this issue because, so far, it's absolutely wrong. You're completely accepting something that, accepting that Salton Sea will be disappeared and will be a cesspool, but thank you very much again.	Comment noted. Recordings of the public meetings are not available, however the presentation is available at https://www.spl.usace.army.mil/Portals/17/docs/regulatory/Projects/SSMP/SSMP-10-Yr-Plan_Public-Meetings_Slideshow_Eng_Esp-Translation_Corps_Jul-2022.pdf?ver=Cpj-exRAqm4syR89UHNDQ%3d%3d Lithium extraction is not a proposed activity under the SSMP 10-Year Plan and not a covered activity under the LOP Procedures.
88	7/12/2022	Transcripts: Public Meeting	Tom Sephton (2)	I do have a very specific question having had access to the document. The alternative one maximum lake edge, can you explain how that does or does not differ from the perimeter lake concept developed by Tetra Tech for the Salton Sea Authority? It appears to be similar. Thanks for the explanation.	It may have some general similarities but there are differences in the specific details in the areas and elevations of the habitat ponds. The perimeter lake concept is described as a concept in the Long-Range Plan, cited as CNRA et al. 2024, released in April 2024.
89	8/16/2022	Postcard	Glenn, volunteer	"Please take swift action to protect the Salton Sea! Refill the Salton Sea - cover the dust!"	Refer to comment responses 6 and 24-3. Reducing dust emissions and thereby minimizing public health issues, is one of the objectives of the SSMP 10-Year Plan.
90	8/16/2022	Postcard	Name not provided	Please take swift action to protect the Salton Sea! Refill the Salon Sea with ocean water importation. "Cover the Toxic Dust"	Refer to comment response 89.
91	8/16/2022	Postcard	Bernice F., concerned resident	PLEASE... take swift action to protect the Salton Sea! <ul style="list-style-type: none">• Import ocean water• Refill the Salton Sea• Cover the dust• Prevent further health issues	Refer to comment response 89.
92	8/16/2022	Postcard	MHL	Please take swift action to SAVE the SALTON SEA - Refill the Salton Sea with ocean water. It's the best option. Cover the dust now.	Refer to comment response 89.
93	8/16/2022	Postcard	Joan Speer, Coachella Valley Resident	Please keep considering ocean water import for the Salton Sea! Refill the Salton Sea! Cover the TOXIC DUST ASAP! Protect our health.	Refer to comment response 89.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
94-1	8/12/22	Email	Sierra Club, 3,309 individuals	<p>I am writing to urge the U.S. Army Corps of Engineers to issue a letter of permission (LOP) allowing critical remediation projects to move forward as part of the State of California's 10-year Salton Sea Management Plan (SSMP).</p> <p>I strongly support the creation of the alternative LOP permitting procedures that will enable the State to fulfill its long-stalled obligations to stop the Sea's decline, protect the health of hundreds of thousands of nearby residents, restore habitat for millions of migratory birds that depend on area, and provide recreational and economic opportunities for the entire region.</p> <p>Thank you for taking urgent action at the Salton Sea.</p> <p>A total of 3,309 individuals were included in this comment submittal from the Sierra Club. The above statement was included for all 3,309 individuals. Some individuals also provided a personalized comment in addition to the above statement, and those comments are included in separate lines below.</p>	Comment noted. Consistent with what was done in the response to scoping comments, the Corps has not listed the ~3,100 names of the Sierra Club members who sent the form email but did not provide personalized comments. Only personalized comments are addressed here.
94-2	8/12/22	Email	Sierra Club, D. Albert	We are destroying this planet with overpopulation, pollution and species extinction. Let us stop it!! This is a good start.	Comment noted.
94-3	8/12/22	Email	Sierra Club, Jasmine Phillips	I also strongly encourage the Audubon California Bombay Beach Wetland Project to be included in Alternative #3 and the Desert Shores Channel Restoration Project to be included in Alternatives 1, 2 and 3. Both projects will not only enhance and restore wildlife habitat, they will also help local communities.	Comment noted. The Audubon project is included in the Proposed Project under Section 3.3.1.1 (Aquatic Habitat Restoration Project Components) and is in Section 3.6 as Alternative 2 (Aquatic Habitats and Enhance and Expand Existing Wetlands) in the EA. Alternative 3 focuses on habitat at the north and south ends of the Sea, and less on enhanced wetland habitat.
94-4	8/20/22	Email	Sierra Club, Art Gertz	Salton Sea should become a top priority water reserve for CA. Filled to optimum level, it will produce even more desal water,(evaporization,). You must get serious about sea water import and sustainable use.	Water importation is outside the scope of the SSMP 10-year Plan. Refer to comment response 6.
94-5	8/20/22	Email	Sierra Club, Miriam Dier	PLEASE HELP THE BIRDS!	Comment noted.
94-6	8/20/22	Email	Sierra Club, Dr. Homer Lesihau	PS: I live in Salton City, 20 years and now sand and weather affects me with allergy and suffering... Please do something before it gets worst and damage environment!	Comment noted. Reducing dust emissions and thereby minimizing public health issues is one of the objectives of the SSMP 10-Year Plan.
94-7	8/19/22	Email	Sierra Club, Maureen and George Oleyar	90% of our California wetlands have already disappeared. The Salton Sea is a vital stopping place along the Pacific Flyway for the thousands of migratory birds each year. The residents in the surrounding areas have been adversely affected for too long by the dried up conditions at the lake. Actions need to be taken NOW!!	Comment noted. Developing a range of aquatic habitats to support fish and wildlife species dependent on the Salton Sea and reducing dust emissions thereby minimizing public health issues are primary objectives of the SSMP 10-Year Plan.
94-8	8/19/22	Email	Sierra Club, Michael Long	With the loss of so much California wetlands over the past two centuries, I strongly support the creation of the alternative LOP permitting procedures that will enable the State to fulfill its long-stalled obligations to stop the Salton Sea's decline, protect the health of hundreds of thousands of nearby residents, restore habitat for millions of migratory birds that depend on the area, and provide recreational and economic opportunities for the entire region. This should be a priority before degradation worsens.	Comment noted.
94-9	8/18/22	Email	Sierra Club, Cary Frazee	This is urgent! We must restore this resource.	Comment noted.
94-10	8/18/22	Email	Sierra Club, Dr. Kay Burch	Clean water is dependent on ecosystems. Without the operant flora and fauna, the system goes off balance as the Salton Sea has done for far too long. Birds are a key element in not just this system but in all to which they migrate. Don't let the world collapse by sacrificing THIS place we can and must save.	One of the primary purposes of the SSMP 10-Year Plan is to develop a range of aquatic habitats to support fish and wildlife species dependent on the Salton Sea and to support the various bird species that use the Pacific Flyway.
94-11	8/17/22	Email	Sierra Club, Sandra Wieser	The country must be criss-crossed by many pipelines, canals, etc. Use these to transport excess water from flooded areas to drier areas? As we shift from gas and oil, use these pipelines to move water to where it is needed. Cheaper to use already constructed pipelines.	Comment noted. Water importation is outside the scope of the SSMP 10-Year Plan. Refer to comment response 6.
94-12	8/17/22	Email	Sierra Club, Jeanne Thompson	Hi! This is a VERY important place for migratory birds! REMEMBER once the birds go; we are NEXT!!! Thank you for all your efforts!	Comment noted.
94-13	8/16/22	Email	Sierra Club, Sue Schaar	Thank you for taking the long-awaited action that is needed.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
94-14	8/16/22	Email	Sierra Club, Dr. Douglas Galasko	The Salton Sea is critical to migrating birds and has been neglected for decades. With shrinkage of its surface area, there are major risks of airborne toxin dispersal to Imperial County, with major adverse health consequences.	Comment noted. Refer to comment response 94-6.
94-15	8/16/22	Email	Sierra Club, Katherine Talbert	Bodies of water are becoming more and more critical to sustaining life on our planet.	Comment noted.
94-16	8/16/22	Email	Sierra Club, Diane Barto	It is vital that this resource be preserved.	Comment noted.
94-17	8/16/22	Email	Sierra Club, Wendy Tokuda	Please save the Salton Sea. We are so depending on you. Thank you!!!	Comment noted.
94-18	8/16/22	Email	Sierra Club, Carol Porter	Please help to restore vital habitat at the Salton Sea.	Comment noted. Refer to comment response 94-7.
94-19	8/15/22	Email	Sierra Club, Daniel Frink	Due to the loss of so much natural habitat for birds and other wildlife, the Salton Sea now plays a critical role in the survival of migratory habitat.	Comment noted. Refer to comment response 94-7.
94-20	8/15/22	Email	Sierra Club, Michelle Turner	All habitats are important and becoming more critical. Taking appropriate action for Salton Sea will benefit people, birds and animals.	Comment noted. Refer to comment response 94-7.
94-21	8/15/22	Email	Sierra Club, Linda Engle	I no longer live near there, but it's an unusual place I treasure. A freak of nature!	Comment noted.
94-22	8/15/22	Email	Sierra Club, Mary Ann Hills	I beg you, please DO THE RIGHT THING. Protect this precious resource for thousands of migratory birds who desperately depend upon this critical resource. Protect nearby residents who deserve to live in a safe environment.	Comment noted.
94-23	8/15/22	Email	Sierra Club, Antonia Chianis	PLEASE HELP	Comment noted.
94-24	8/15/22	Email	Sierra Club, Dr. Elliot Kaplan	It is a win/win proposition. Let's undo the destruction we caused and many will benefit--humans as well as birds.	Comment noted.
94-25	8/15/22	Email	Sierra Club, Galatea Maman	Please help stop the Salton Sea's decline and restore habitat for millions of migratory birds that depend on the area, please - the world lost THREE BILLION birds over the last twenty years....	Comment noted. Refer to comment response 94-10.
94-26	8/15/22	Email	Sierra Club, Sharon Hansen	Thank you Thank you a hundred times.	Comment noted.
94-27	8/13/22	Email	Sierra Club, Cherri Shiffman	Climate change is destroying so much of our special places. Help us keep this special place for birds.	Comment noted.
94-28	8/13/22	Email	Sierra Club, Rita Shamban	We are ones who must act. There is no other agency in this planet to take care of our environment, but us. Please help.	Comment noted.
94-29	8/13/22	Email	Sierra Club, Cathleen Fogel	Please do what you can to protect these magnificent birds for the generations to come.	Comment noted. Refer to comment response 94-10.
94-30	8/13/22	Email	Sierra Club, Mary Williams	Please support bird migration. It is really important to me as a back-yard bird watcher to know that birds get enough water on their migration pathways.	Comment noted. Refer to comment response 94-10.
94-31	8/13/22	Email	Sierra Club, Margaret Hannan	Hello we need to save Salton Sea! Years ago I used to swim there. I live in Santa Monica and I think 5 years ago we were hit in Santa Monica with a horrible stench, turns out it was from the Salton Sea. CLEAN IT UP!	Comment noted.
94-32	8/13/22	Email	Sierra Club, Dr. John and Nuri Pierce	At this point this is more urgent than ever and if there's action to protect it now we will reap the benefits for years to come. If we don't birds and the Salton Sea will be lost forever. We need the Salton Sea to be protected now!	Comment noted.
94-33	8/13/22	Email	Sierra Club, Cathy Chambers	I have been teaching children about the importance of preserving areas like these for the birds for 20 years. Let's do this for our children, to leave them a healthy planet.	Comment noted.

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94-34	8/13/22	Email	Sierra Club, Carol Becker	This is going to be a problem for years to come and a disaster for the area if changes are not made soon. Too late to close the barn door after the horses get out, so to speak, so act now to prevent a tragedy from happening for environment, people and animals involved.	Comment noted.
94-35	8/13/22	Email	Sierra Club, Abra Sonnanstine	Please don't let these birds die. They have a right to life as a group and a right to not die in a horrible, painful way as individuals.	Comment noted.
94-36	8/13/22	Email	Sierra Club, Melissa Kelly	Quit talking about it and give some water to the wildlife. Take as an example the Owens Valley. Ag shouldn't be taking it all.	Comment noted. Refer to comment response 94-7.
94-37	8/13/22	Email	Sierra Club, Donna Thompson	I am a native Californian. I don't live near the Salton Sea, but I definitely care about it.	Comment noted.
94-38	8/13/22	Email	Sierra Club, Jean Riehl	SAVE the Salton Sea! It can be saved. DO IT !!!	Comment noted.
94-39	8/13/22	Email	Sierra Club, Cathy McCain	It is critical for us to restore habitat wherever possible since we have taken so much from wildlife on our planet.	Comment noted.
94-40	8/13/22	Email	Sierra Club, Dr. David Davis	As an avid birder and professional wildlife biologist/natural resources manager, I understand the importance of the Salton Sea as an integral part of the Pacific Flyway for neotropical migratory birds. It also play an important role in local recreational opportunities. The waters have shrunk and dry dusty playas have resulted; causing increased air pollutants. Please move forward with vital remediation projects as part of Phase I of the SSMP. Thanks!	Comment noted. Refer to comment response 94-10.
94-41	8/13/22	Email	Sierra Club, Helene Minniti	After decades of neglect our beautiful and irreplaceable planet needs us to protect, protect and protect !	Comment noted.
94-42	8/13/22	Email	Sierra Club, Tamima Itani	I am deeply worried about the upcoming fall migration and the fate of birds that will not find suitable stopover habitat on their way south.	Comment noted. Refer to comment response 94-10.
94-43	8/13/22	Email	Sierra Club, Claudia Spener	I live in St. Louis, Missouri on the Mississippi Flyway and I know how important these migratory routes are to birds. The Salton Sea is one of the most important continental stops for safe passage of migratory birds.	Comment noted. Refer to comment response 94-10.
94-44	8/13/22	Email	Sierra Club, Natalie Vergonet	The Salton Sea used to be thriving with birds and fish. Please, it is a shell of what it once was but could be again. I have lived in San Diego for 19 years and it is so sad to see it even worse than when I first arrived. Let's get going and make the whole area beautiful, flourishing and prosperous again!	Comment noted.
94-45	8/13/22	Email	Sierra Club, Harold Tipping	This is Very Important.	Comment noted.
94-46	8/14/22	Email	Sierra Club, Yvonne Reyes	Thank you in advance for your support!	Comment noted.
94-47	8/14/22	Email	Sierra Club, Margot Lowe	The plans are there - finance is needed.	Comment noted.
94-48	8/12/22	Email	Sierra Club, Darrell Vaughn	Visiting the area 4 years ago, I was appalled at the condition of the lakebed. Compared to the 1970-1980's when birding was a pleasure, the barren, blackened lakebed stunk, and birds were nowhere to be found! Please do what can be done to restore this area to at least a semblance of its former self.	Comment noted.
94-49	8/14/22	Email	Sierra Club, Robert Marshall	A friend and I have birded this area, and it is magnificent for the birds that winter there. Obviously, it is crucial for human life in southern California as well; but we must have an obligation to protect the other inhabitants of our planet.	Comment noted.
94-50	8/14/22	Email	Sierra Club, Prem McMurdo	Climate change has drastically affected the survival of migrating birds and marginalized communities. Salton Sea is an example of this change and it will only get worse, I fear. It needs all the help it can get to recover. Please help.	Comment noted.
94-51	8/14/22	Email	Sierra Club, Shelly Hutchinson	Please protect this important link in a chain of wildlife habitat. And the people who live here deserve a safe, healthy place to live. We cannot continue to devalue some people and some poorer areas without endangering all of us.	Comment noted.

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94-52	8/14/22	Email	Sierra Club, Zena Lamp	The residents deserve to live with healthy air. Protecting the Salton Sea will protect the health of hundreds of thousands of nearby residents, restore habitat for millions of migratory birds that depend on the area, and provide recreational and economic opportunities for the entire region. It would be a win for people and wildlife and a boost to California's economy.	Comment noted.
94-53	8/14/22	Email	Sierra Club, Carol Pecot	How often do you get the opportunity to make such a large difference to so many living things, both people and life-critical rest stops for birds migrating thousands of miles?	Comment noted.
94-54	8/14/22	Email	Sierra Club, Jonnel Covault	The Salton Sea is a very unique area. Please get started ASAP on remediation projects. Restore the Sonny Bono Memorial Boat Basin !	Comment noted.
94-55	8/14/22	Email	Sierra Club, William Barclay	DON'T LET THE SALTON SEA BECOME A DUST BOWL	Comment noted.
94-56	8/14/22	Email	Sierra Club, Rebecca Fisher	This is an urgent matter, I hope it is not too late.	Comment noted.
94-57	8/14/22	Email	Sierra Club, Gloria McClintock	I have visited the Salton Sea years ago and the area is unique and needs preservation.	Comment noted.
94-58	8/13/22	Email	Sierra Club, Jack Schlotte	I contributed photographs for the book on the Birds of the Salton Sea and have participated in scientific bird surveys, both at the Salton Sea and in nearby San Diego County. I've seen the horrid environmental decline there first hand over the course of many years. It is past time to set things right and restore the Sea.	Comment noted.
94-59	8/12/22	Email	Sierra Club, Pilar Garcia	We need to act now and not delay. This issue is very important to me as a proponent of the environment.	Comment noted.
94-60	8/12/22	Email	Sierra Club, Barrie Stebbings	Save endangered migratory bird species who depend on these waters for survival.	Comment noted.
94-61	8/12/22	Email	Sierra Club, Ellen Hamilton	I come from generations of nature and bird appreciators, and we love the desert, especially Anza Borrego and the Salton Sea area. Preserving this important migratory habitat is essential.	Comment noted.
94-62	8/12/22	Email	Sierra Club, Bree Brown	Do the right thing~ Our environment which includes all animals, birds, fish, and oh humans, needs a clean environment to grow and thrive. Do the right thing.	Comment noted.
94-63	8/12/22	Email	Sierra Club, Daphne Russell	We don't have time to waste on this project and this work could have a significant long-term impact on our efforts to combat the drought and other effects of climate change. Please move forward and take action to urgently restore the Salton Sea.	Comment noted.
94-64	8/12/22	Email	Sierra Club, Nadine Scott	It could also protect the health of nearby sensitive receptors like HUMAN BEINGS!	Comment noted.
94-65	8/12/22	Email	Sierra Club, Janet Dales	As a former resident in So. California who spent much time camping and exploring the desert in our Landcruisers, we have special memories of this area. Even then pollution was a problem for air quality and breathing easily for me.	Comment noted.
94-66	8/12/22	Email	Sierra Club, Anne Marlborough	PLEASE, please consider hearing our plea.	Comment noted.
94-67	8/12/22	Email	Sierra Club, Sheryl Nadeau	It is so sad how our environment is declining is so many areas of our country. It seems we should do what we can to try and prevent this decline.	Comment noted.
94-68	8/12/22	Email	Sierra Club, Patricia Gussler	Please help this very special area. I go there, I see birds. It's really looking sad now and the shoreline full of dead barnacles is like quicksand to walk in. Not expecting it will ever be up to where it once was, but this precious body of water, salt and all, needs to be helped, as do the people that live around the sea. Please take action.	Comment noted.
94-69	8/12/22	Email	Sierra Club, Lisa Sadleir-Hart	I care deeply about birds and helping them in every way we can to adapt to climate change.	Comment noted.

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94-70	8/12/22	Email	Sierra Club, Dr. Jude Tiersma Watson	Dear U.S. Army Corps of Engineers, I am new to the birding world, and only recently realized how serious the situation is with the Salton Sea. We have lost so much habitat in Southern California, habitat that sustains life. Thank you for taking action at the Salton Sea! Future generations will thank you.	Comment noted.
94-71	8/12/22	Email	Sierra Club, Ron Cyger	I have been visiting the sea for decades along with thousands of other people. For the reasons stated above, we must save the sea.	Comment noted.
94-72	8/12/22	Email	Sierra Club, Susan O'Connell	Come on guys!! Do something - this stop is needed in their flight survival.	Comment noted.
94-73	8/12/22	Email	Sierra Club, Kathlyn Pihl	Please support the creation of the alternative LOP for the Salton Sea. This is not only critical for the human neighbors, but for all the life that we humans depend on without recognizing it. Especially the millions of migratory birds for which the Salton Sea is essential for their flyway.	Comment noted.
94-74	8/12/22	Email	Sierra Club, Bernadette Cormier	Please please please ... we all know and we all feel how urgent this is. We appreciate you. Let's act NOW!	Comment noted.
94-75	8/12/22	Email	Sierra Club, Katherine Jarrett	I have visited the Salton Sea and have seen the degradation in its ability to sustain bird habitat.	Comment noted.
94-76	8/12/22	Email	Sierra Club, Jennifer Baldwin	Please help our Salton Sea, which in turn helps our country and our world!!	Comment noted.
94-77	8/12/22	Email	Sierra Club, David Weeshoff	As an ardent conservationist, and bird lover:	Comment noted.
94-78	8/12/22	Email	Sierra Club, Janet Yaws	This has taken far too long to be addressed and action is needed now.	Comment noted.
94-79	8/12/22	Email	Sierra Club, Marilyn Lemmon	I live in far Northern California and the Lower Klamath is a disaster for wildlife. Please do better down south.	Comment noted.
94-80	8/12/22	Email	Sierra Club, Carla Cicchi	All our waters are important and must be protected always.	Comment noted.
94-81	8/12/22	Email	Sierra Club, Dr. Kathlyn Hendricks	Our unique and fragile ecosystems need our support to continue sustaining all the populations that rely on them	Comment noted.
94-82	8/12/22	Email	Sierra Club, Daniel Holland	Please save the habitat for birds.	Comment noted.
94-83	8/12/22	Email	Sierra Club, Coette Schmidt	It is unthinkable to allow more birds/wildlife to perish when there is a solution. Take steps NOW!	Comment noted.
94-84	8/12/22	Email	Sierra Club, Corey Timpson	I remember vacationing on the Salton Sea as a child some 40 years ago. Let's save the Salton Sea and the migratory birds and community that depend on it.	Comment noted.
94-85	8/12/22	Email	Sierra Club, Lynn Forbes	Protect the wildlife who depend on the Salton Sea!.	Comment noted.
94-86	8/14/22	Email	Sierra Club, Gloria McClintock	Decades ago I spent time exploring around the Salton Sea. It is a unique body of water and habitat and needs protection.	Comment noted.
94-87	8/12/22	Email	Sierra Club, Joan Timpany	Anything we can do to help migratory birds in this time of climate change and habitat degradation needs to be done.	Comment noted.
94-88	8/12/22	Email	Sierra Club, Lolita Soriano	It is critical that we preserve the bird habitat and protect the health of nearby residents. Please support this effort. Your attention to this matter is greatly appreciated.	Comment noted.
94-89	8/12/22	Email	Sierra Club, Lydia Flores	We should have been on the watch because of climate changes. We have neglected to prepare for what could be a major disaster for the surrounding population and our migratory fliers. Is it too late to save the Salton Sea? Will it become a dust bowl? Will the surrounding area become ghost towns? Please take action now to save this important water source before it is too late.	Comment noted. Refer to comment response 94-7.

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94-90	8/12/22	Email	Sierra Club, Dr. Richard Payne	This is a vital bird habitat, and needs remediation now, and ongoing support in the future.	Comment noted.
94-91	8/12/22	Email	Sierra Club, Kennedy George	There is an important opportunity here to mitigate this ecological disaster. This is the most polluted lake in California and an essential water resource for birds in migration. We need to correct the damage that has been done and provide a non toxic water source for wildlife.	Comment noted.
94-92	8/12/22	Email	Sierra Club, Jane Loomis	Do what is right.	Comment noted.
94-93	8/12/22	Email	Sierra Club, Cristina Warren	I live in Borrego Springs, only 25 miles away. This would make such a huge difference for the birds, and for the whole health of the surrounding areas...including all of Southern California if the sea should dry up.	Comment noted.
94-94	8/12/22	Email	Sierra Club, Victoria Bruckner	As a child in the 1950s, I remember swimming in the Salton Sea, but this is no longer possible.	Comment noted.
94-95	8/12/22	Email	Sierra Club, Dr. Bob Miller	Have you SEEN what's going on there?	Comment noted.
94-96	8/12/22	Email	Sierra Club, Peter Ring-Revotskie	You must protect the Salton Sea!!!	Comment noted.
94-97	8/12/22	Email	Sierra Club, Tansy Myer	My mom lives in Mountain Center and we can smell the decay of the Salton Sea. Please help!!!	Comment noted.
94-98	8/12/22	Email	Sierra Club, Marianne Hunter	You KNOW the reasons the Salton Sea is ecologically essential and it's health is important to human health as well. SO... all my family and I can do is say PLEASE do what must be done now, BEFORE IT'S TOO LATE!	Comment noted.
94-99	8/12/22	Email	Sierra Club, Lynn D Ludlam	A very important issue for the future of our wildlife.	Comment noted.
94-100	8/12/22	Email	Sierra Club, A.F. Shayne	humanity, not hegemony	Comment noted.
94-101	8/12/22	Email	Sierra Club, Tim Farmer	I lived for 8 years in the Coachella Valley and visited The Salton Sea many times. I also care greatly about the health of our environment and it's denizens. We need to care about the Salton Sea very strongly. This is a critically endangered biosystem that effects huge numbers of birds and other animals as well as people.	Comment noted.
94-102	8/12/22	Email	Sierra Club, Elizabeth Miller	The Salton Sea does a number of other things for nature and the environment as you well know. We need to keep the Salton Sea and the birds as healthy as we can in this climate.	Comment noted.
94-103	8/12/22	Email	Sierra Club, Trudy McMahon	Help the birds and, by that, help the humans!	Comment noted.
94-104	8/12/22	Email	Sierra Club, Dr. Eric Schroeder	Each year I've visited the Salton Sea I've seen the environmental degradation. The last time I went the dust was so bad I turned around and went home. Please help to mitigate this environmental disaster!	Comment noted.
94-105	8/12/22	Email	Sierra Club, Sally Campbell	Please help critical remediation projects move forward NOW and take required action to save this area that is so important to residents, migratory birds and this important region.	Comment noted.
94-106	8/12/22	Email	Sierra Club, Ronnie Tiner	The Salton sea needs to be restored.	Comment noted.
94-107	8/12/22	Email	Sierra Club, Janet Boeninger	California is supposed to be environmentally friendly, which I support. If State of California has 10-year Salton Sea Management plan and Audubon agrees, this plan should be allowed to go forward. If you have a valid reason for not approving, it should be disclosed immediately so it can be resolved. I also I just found out that a lot of the CA forests that were burning out of control this year and last couple of years are owned by Federal government. I am in process of writing CA Senators that Federal government has to do more to actively maintain/prevent/protect National forests from massive fires, in some cases started by lightning and especially in this long drought.	Comment noted.

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94-108	8/12/22	Email	Sierra Club, Christine Troche	This area is vital to the balance and health of the exciting habitat to support the migratory birds. Allows education for the young and old to explore and enjoy.	Comment noted.
94-109	8/12/22	Email	Sierra Club, Anne Sturm	It is vital that this work be permitted to save the birds that depend on the Salton Sea and the residents that will breathe the contaminated " dust" in California and throughout the neighboring states.	Comment noted.
94-110	8/12/22	Email	Sierra Club, Catherine Lanzl	The time is now, to protect this irreplaceable public land!!!	Comment noted.
94-111	8/12/22	Email	Sierra Club, Andrew Creighton	We need your help to see some positive action on this!	Comment noted.
94-112	8/12/22	Email	Sierra Club, Gloria McClintock	Decades ago I spent time exploring around the Salton Sea. It is a unique body of water and habitat and needs protection.	Comment noted.
94-113	8/12/22	Email	Sierra Club, Dr. Donna Luckey	I visited the Salton Sea years ago and I continue to value the unique habitat provided there. I appreciate the fact that the Army CofE is willing to include remediation and restoration projects in your planning.	Comment noted.
94-114	8/12/22	Email	Sierra Club, Cara Lou Wicks	We need to preserve and protect these wild places and inhabitants !	Comment noted.
94-115	8/12/22	Email	Sierra Club, Dianna G. Zets McNair	It is a vital and beautiful ecosystem. As a young child, I camped on the north shore in the 1950s with my family. It was a magical, wondrous place. You now have the funds and means to restore the Dalton Sea. Please take action	Comment noted.
94-116	8/12/22	Email	Sierra Club, Kent Kobersteen	There is an urgent need for this action. As someone who vista the Sea often I am well aware of the vital role of the Sea, and the need to solve the health problems of those who live in the area.	Comment noted.
94-117	8/12/22	Email	Sierra Club, Jim Hamner	I have visited the area and marveled at the many varieties of birds, this is a very important stop over for them and a special place for those who know. I'm a wildlife photographer and it doesn't get much better than the Salton Sea.	Comment noted.
94-118	8/12/22	Email	Sierra Club, Beverly Eddy	I always thought I would leave the world a better place, but, sadly, it appears we are failing this task. Please take this one step in the right direction.	Comment noted.
94-119	8/12/22	Email	Sierra Club, Ruth Reynolds	The Salton Sea is suffering from the doubt as so many water ways are; however, the Salton Sea needs immediate attention being a major migratory stopping oasis for many differing bird species, and a health hazard for residents living near by.	Comment noted. Refer to comment response 94-7.
94-120	8/12/22	Email	Sierra Club, Heather Brophy	LET'S GET GOING GOD ONLY KNOWS WE HAVE THE MONEY!!	Comment noted.
94-121	8/12/22	Email	Sierra Club, Mike McMahon	I live in San Diego and frequently visit the Salton Sea. area and have witnessed years of terrible management and neglect of this unique habitat. Please move forward . . .	Comment noted.
94-122	8/12/22	Email	Sierra Club, Ronda Peak-Snow	Stop stalling on what needs to be done to save this lake and the birds that depend on it. Time to do something proactive and positive for a change!	Comment noted.
94-123	8/12/22	Email	Sierra Club, Marcyn Clements	Yes, all that, and a more personal message from me, that my husband and I camped and drove the roads around the Sea for many years, enjoying the birdlife. I remember flamingos one year. I remember finding a lost Bohemian waxwing, on a wire in the south end. I remember waking one night at camp in time to see the Perseids fly! What a wonderful place to bird it was for us in the 80's and 90's. As I was born in Brawley and my parents had a farm near Calipatria, and my Mother in Law's father was a president of the bank, and after he died, his best friend walked my Mom down the aisle at her wedding. He was the last of the Lone Star Rangers, Ira Aten! So my roots go deep, and my passion for the Salton Sea is everlasting. I know it was an accident, the making of it, but please try to keep it. For the future generations. The young birders of the world. It was a world class birding hot spot!	Comment noted.
94-124	8/12/22	Email	Sierra Club, Evan Jane Kriss	Any delay in action will just exacerbate the situation there, further endangering all life in the area.	Comment noted.
94-125	8/12/22	Email	Sierra Club, Jan Ricco	Please, protect the Salton Sea forever.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
94-126	8/12/22	Email	Sierra Club, Norbert Farrell	This is a very crucial place for our many species of migrating birds that pass through it every year. They are able to raise their young, rest, absorb minerals they need & the population of brine shrimp are very important to them.	Comment noted. Refer to comment response 94-10.
94-127	8/12/22	Email	Sierra Club, Dr. Mary Turnipseed	Ecosystems from above the Arctic Circle down to the Antarctic depend on the annual arrival of migratory birds that use the Salton Sea along the way. It is therefore essential for global conservation that the Army Corps issue this LOP.	Comment noted. Refer to comment response 94-10.
94-128	8/12/22	Email	Sierra Club, Sharon King	If you have never been to experience the Salton Sea, do so, and you will immediately feel the need to preserve it. It awakens the senses and the life it brings to the area creates a feeling of wonder. Having taught both third and fourth grade I'd refer to this created phenomenon but never appreciated the full scope until visiting. Keep it alive.	Comment noted.
94-129	8/12/22	Email	Sierra Club, Janine Kelley	The dust from a dry river bed will be injurious to children, elders, asthma sufferers and pets!	Comment noted. Refer to comment response 94-6.
94-130	8/12/22	Email	Sierra Club, Susan Steffes-Ferri	It's past time for something to be done to save the Salton Sea.	Comment noted.
94-131	8/12/22	Email	Sierra Club, Maria Hiatt	Someone has to stand up to protect the habitat now before it is too late, which it almost seems to be just that.	Comment noted.
94-132	8/12/22	Email	Sierra Club, Constance Ralls	Climate modeling and current scientific research should be considered in creating remediation efforts to prevent the Salton Sea from drying up.	Comment noted.
94-133	8/12/22	Email	Sierra Club, Cheryl Abel	Many years ago I visited the Salton Sea for their Bird Festival and saw how crucial the area is to birds. I know the area has changed drastically since that time. You can now fix it.	Comment noted.
94-134	8/12/22	Email	Sierra Club, Michelle Michaud	I have visited this area numerous times over the years and have seen the decline in water levels and birds. It would be a significant loss to this area economically if birders and bird watchers stopped coming to the area. Please do everything possible for this very important resource.	Comment noted.
94-135	8/12/22	Email	Sierra Club, Chuck L.	I have taken classes there for enlightenment about the importance of this huge lake, even if it smells bad. They get excited about seeing so many different species of birds. I take a spotting scope so every student can see each bird up close and in detail most of them cannot properly use binoculars without more practice but the spotting scope helps them to see clearly the birds. DON'T LET THIS GEM DISAPPEAR!! It is too important.	Comment noted.
94-136	8/12/22	Email	Sierra Club, Luanne Clayton	Both people and migratory birds need these protections.	Comment noted.
94-137	8/12/22	Email	Sierra Club, Virginia Sturken	We must take care of this area for the future.	Comment noted.
94-138	8/12/22	Email	Sierra Club, Jane McCall	If we don't act now, it may be too late for thousands of birds who rely on this water source. PLEASE do something now.	Comment noted.
94-139	8/12/22	Email	Sierra Club, Dr. Andrea Horbinski	the Salton Sea go dry will be catastrophic for people as well as birds.	Comment noted.
94-140	8/12/22	Email	Sierra Club, Sue Kirkpatrick	We need to take responsibility for the mess we have made and attempt to reverse the damage. Thanks	Comment noted.
94-141	8/12/22	Email	Sierra Club, Leanne Bynum	Protect our national treasures.	Comment noted.
94-142	8/12/22	Email	Sierra Club, Susan Titus	Although I live in northern California and have never been to the Salton Sea, I believe that it is essential that it be restored in order to allow the birds to have a place to stop, rest and refuel for their migrations.	Comment noted.
94-143	8/12/22	Email	Sierra Club, Juliana Wells	The reasons above should be adequate. But here is one more. It is the right action to take. Thank you for taking urgent action at the Salton Sea.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
94-144	8/12/22	Email	Sierra Club, Elaine Barrett	Please take action to prevent further deterioration of the Salton Sea and the deleterious effects that deterioration is causing to the surrounding environment. Thank you for reading my email message.	Comment noted.
94-145	8/12/22	Email	Sierra Club, Dr. Karen Jacques	I am tired of watching and waiting while nothing is done and the crisis worsens. The Letter of Permission needs to be issued NOW.	Comment noted.
94-146	8/12/22	Email	Sierra Club, Michael Schramm	Today I am writing in support of LOP permitting procedures that will help to improve the health of the ecosystem supporting birds and other animals in the Salton Sea.	Comment noted.
94-147	8/12/22	Email	Sierra Club, Theresa Acerro	This area has been neglected for way too long. This has to be treated as an important issue to be dealt with immediately. Finally.	Comment noted.
94-148	8/12/22	Email	Sierra Club, Heidi Lynn	Please save this habitat for the good of all concerned. It's important to the ecosystem in the area. You should already know this and should already be protecting it. So just do it.	Comment noted.
94-149	8/12/22	Email	Sierra Club, Carolyn McArthur	This action is long overdue. Too much talk and not enough action up to now.	Comment noted.
94-150	8/12/22	Email	Sierra Club, Dr. Linda Ozkan	The planet will survive but we won't unless we take action NOW!	Comment noted.
94-151	8/12/22	Email	Sierra Club, Dr. Rita Ryack	The Salton Sea is a unique ecosystem, and a critical stop for thousands of migratory birds. We have campaigning to save the Salton Sea for years. We can't afford not to!	Comment noted.
94-152	8/12/22	Email	Sierra Club, Stephen Ferry	I am a member of the Santa Barbara Audubon Society. I'm also a docent for the Snowy Plover and a volunteer California Condor nest watcher for the USFWS.	Comment noted.
94-153	8/12/22	Email	Sierra Club, T. Cassidy	The negligence of the Salton sea has been needless and criminal but it's recovery must be essential and monumental to lead the way to an ethos of mitigation and restoration to mark the coming years of climate change.	Comment noted.
94-154	8/12/22	Email	Sierra Club, Albert Valencia	We need to do everything we can to save this planet. This means stopping drilling for oil. The use of internal combustion engines has to end. We need to step into the future to save humanity.	Comment noted.
94-155	8/12/22	Email	Sierra Club, Michelle McCay	What side of history will you stand on?	Comment noted.
94-156	8/12/22	Email	Sierra Club, Jeff Miner	My hope in the future is that we would import sea water to fill the Salton Sea back up to its rim.	Comment noted. Refer to comment response 94-4.
94-157	8/12/22	Email	Sierra Club, Margaret Badger	I have watched the beautiful White Pelicans fishing at Crowley Lake, another important stopping place for birds. The Salton Sea is essential for the continued health and survival of these birds. Thank you for making an effort for helping this eco system.	Comment noted.
94-158	8/12/22	Email	Sierra Club, Lynne Harkins	The Salton Sea is an important and unique setting that requires and deserves preservation and restoration. It lives in my memory as the site of amazing experiences/sightings when I was just beginning to become an avid birder. I thank the Corps for your attention to positive outcomes in this matter.	Comment noted.
94-159	8/12/22	Email	Sierra Club, C.S.	Please protect our vitally important Salton Sea NOW!!	Comment noted.
94-160	8/12/22	Email	Sierra Club, Andres Edwards	Please consider and make a priority the vital importance of the health of the Salton Sea for migratory birds and other wildlife.	Comment noted.
94-161	8/12/22	Email	Sierra Club, Lisa Bailey	We HAVE to take care of the earth in order for her to take care of us!	Comment noted.
94-162	8/12/22	Email	Sierra Club, Christine Kim	Thank you so much for your immediate attention to this matter. My children and I deeply care about the safety and wellbeing of all birds, which contributes to biodiversity and an overall healthy ecosystem.	Comment noted.
94-163	8/12/22	Email	Sierra Club, Lawrence Lovell	Save the Salton Sea please!	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
94-164	8/12/22	Email	Sierra Club, Dr. Catherine Trejo	I will never forget the one opportunity I had to go birding at the Salton Sea. Spectacular birds both in flocks and individually, and spectacular views!	Comment noted.
94-165	8/12/22	Email	Sierra Club, Kareen Kalvin	Thanks for helping the birds, residents and other wildlife	Comment noted.
94-166	8/12/22	Email	Sierra Club, Mary Stanley	I want to see the Salton Sea restored for the birds and future generations to enjoy the birds.	Comment noted.
94-167	8/12/22	Email	Sierra Club, Catherine Hein	The Salton Sea needs your help.	Comment noted.
94-168	8/12/22	Email	Sierra Club, Hannah Zilke	This is an opportunity to create a positive change for the community in which the U.S Army operates, and would hopefully be the start of the end of the long history of environmental devastation on the part of the U.S Armed Forces and it's allies. There is no better time to do something than the present.	Comment noted.
94-169	8/12/22	Email	Sierra Club, Anita Watkins	The time is now. Let's take action to protect the Salton Sea - PLEASE!	Comment noted.
94-170	8/12/22	Email	Sierra Club, Autumn Anderson	I live near the Coachella Valley and Salton Sea area and would be directly impacted by the dangers of the dry sea bed. This is a restoration of man-made destruction of this habitat, so it is up to humans to fix it.	Comment noted.
94-171	8/12/22	Email	Sierra Club, Constance Mills	Please save the soliton Sea. It has a very important part to play in the lives of the people who depend on it for their health and recreation. Also it is very important for migratory birds. The Salton Sea needs attention NOW.	Comment noted.
94-172	8/12/22	Email	Sierra Club, Martha Thieman	I LOVE BIRDS!!	Comment noted.
94-173	8/12/22	Email	Sierra Club, Pat Gardner	Without birds, our ecosystem will be destroyed. I'm an avid, responsible birder and beg you to help The Salton Sea. I've been there many times and love it.	Comment noted.
94-174	8/12/22	Email	Sierra Club, Dr. Jann Johnson	This is imperative for survival of these species.	Comment noted.
94-175	8/12/22	Email	Sierra Club, Cheryl Freeman	We are at a crisis point.	Comment noted.
94-176	8/12/22	Email	Sierra Club, Dena Turner	I have visited the Salton Sea and understand from seeing it first hand what a resource it can be for millions of migratory birds that are threatened and decreasing steadily in numbers. The Salton Sea must be protected and its habitat restored in order to prevent the further slide into endangered and extinct species.	Comment noted.
94-177	8/12/22	Email	Sierra Club, Bobbi Loeb	The Salton sea is crucial for migrating birds !	Comment noted.
94-178	8/12/22	Email	Sierra Club, Lory Allan	Thank you for taking the time to review this. Please help these birds.	Comment noted.
94-179	8/12/22	Email	Sierra Club, Amanda Meeker	My first visit to the Salton Sea this past February made me acutely aware of the importance of this resource for birds on the Pacific Flyway, and how threatened it is. Not to mention the other points raised in the previous paragraph! Please help save the Salton Sea.	Comment noted.
94-180	8/12/22	Email	Sierra Club, Tammah Watts	I am a life long Californian and strongly urge you to please take heed. Birds, the Salton Sea, and all of our communities are impacted. You can help and thank you	Comment noted.
94-181	8/12/22	Email	Sierra Club, Angela Carter	We should and must start prioritizing Life and Lands.	Comment noted.
94-182	8/12/22	Email	Sierra Club, Dr. Kathleen Taylor	This is an opportunity to change a terrible situation into a long-term benefit for everyone. I am a long-time supporter of our talented, capable military. Please, prove me right!	Comment noted.

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94-183	8/12/22	Email	Sierra Club, Nancy Christensen	The Salton Sea is a very unique area and important bird area. I have had the opportunity to bird in this area and learn about the historical significance of the area for birds and people. It is worth saving!	Comment noted.
94-184	8/12/22	Email	Sierra Club, Sheryl Chapman	We must preserve what wild bird populations we have left while we still can.	Comment noted.
94-185	8/12/22	Email	Sierra Club, Jill North	It is long past time to protect the Salton Sea for our birds. The sea was contaminated by farm run off for years and all we got was talk. DO SOMETHING	Comment noted.
94-186	8/12/22	Email	Sierra Club, Steven Spiegel	The Salton Sea is a unique natural treasure that deserves protection and restoration.	Comment noted.
94-187	8/12/22	Email	Sierra Club, Joyce Reeder	Our world is faced with so many natural crises. Please help avert a disaster at the Salton Sea and issue the LOP to allow the State to begin work to stop the decline of the Salton Sea. I appreciate whatever you can do to make the right things happen.	Comment noted.
94-188	8/12/22	Email	Sierra Club, Dr. Paul Deauville	My first visit to the Salton Sea was in 1947 at 11 years of age, and I still vividly recall the beauty of the Sea and the multitude of wildlife. It must not be in the future for further deterioration but a permanent goal of preservation for the Salton Sea!	Comment noted.
94-189	8/12/22	Email	Sierra Club, Christine Meleg	As a biologist I realize the importance of preserving habitat not only for birds but for the entire environment around Salton Sea. Now is the time to act. Now is the time to reverse the decline of this vital area.	Comment noted.
94-190	8/12/22	Email	Sierra Club, Paul Brigham	As a citizen and parent who cares deeply about the environment I believe we must do everything within our power to protect it and its inhabitants for future generations.	Comment noted.
94-191	8/12/22	Email	Sierra Club, Rachael Denny	Why settle for anything less?	Comment noted.
94-192	8/12/22	Email	Sierra Club, Dianne Lane	There is no Planet B.	Comment noted.
94-193	8/12/22	Email	Sierra Club, Mary Knight	Please help us preserve this vital bird habitat.	Comment noted.
94-194	8/12/22	Email	Sierra Club, Heather McLarty	There is no time to waste.	Comment noted.
94-195	8/12/22	Email	Sierra Club, Diana Chesney	We are at a tipping point for many species and ecosystems. The mega drought taking place in the western United States may result in a drastic decline of birds along the Pacific Flyway if we do not take action now. Please take action on behalf of our children, grandchildren, future generations and our imperiled Pacific Flyway birds. Thank you.	Comment noted. Refer to comment response 94-10.
94-196	8/12/22	Email	Sierra Club, Renate Rand	We must preserve as much habitat as possible for the animals/birds and for the good of the planet.	Comment noted.
94-197	8/12/22	Email	Sierra Club, Melinda Martin	Humans cannot survive this earth without the birds and animals.	Comment noted.
94-198	8/12/22	Email	Sierra Club, Julie Peppard	Let's reverse the trend of loss of birds in America, one habitat at a time!	Comment noted.
94-199	8/12/22	Email	Sierra Club, Lisa Stateman	We look to you for leadership in setting the standards for responsible stewardship nationwide.	Comment noted.
94-200	8/12/22	Email	Sierra Club, Pam Neuberg	I hope you will strongly support, as I do.	Comment noted.
94-201	8/12/22	Email	Sierra Club, Linda Elder	We all know about the canary in the coal mine. Help us not kill the canaries, ourselves or the Salton Sea.	Comment noted.
94-202	8/12/22	Email	Sierra Club, Susan Hayes-Tripp	We as a species, can not keep defecating on this planet. Considering that our human population will hit 8 BILLION before the end of 2022, we need to take a step back & decide who is really creating all the problems. Wildlife will do nicely without our species, yet we can not survive without them.	Comment noted.

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94-203	8/12/22	Email	Sierra Club, Anne Irving	Thank you for moving forward to create a healthy habitat out of the Salton Sea.	Comment noted.
94-204	8/12/22	Email	Sierra Club, Laura Fox	Please do everything you can to protect the vital bird habitat -- the magical Salton Sea and its land area. All of us together must show a reverence for this priceless site and all the living things who depend on it for their survival. We must not forget that we humans are the caregivers of our precious planet Earth, and it is our privilege and responsibility to watch over it. We have failed too many times to do what is right. Please take action, immediately -- action that will ensure the survival of countless birds and protect the well-being of many people. Be our heroes. Thank you.	Comment noted.
94-205	8/12/22	Email	Sierra Club, Marcia Johnson	This is an important area. Thank you.	Comment noted.
94-206	8/12/22	Email	Sierra Club, Ken Sanford	The Salton Sea was created by an inadvertent act of man. However, since its' creation it has become a refuge for many bird species that have declined in number as natural wetlands have been drained and allotted to other purposes. Birds are important for the prosperity of nature, and, we must commit ourselves to protect and nurture their future even in the age of declining resources. The continuation of the Salton Sea is important for birds, for man, and for nature. Protect the Salton Sea.	Comment noted.
94-207	8/12/22	Email	Sierra Club, Amy Sherwood	We are loosing many species of animals in the wild which we cannot afford to do. Every living thing on Earth is linked to one another, even to us. Please stop the further endangerment of our precious birds, reptiles, amphibians, insects, spiders and mammals on the short list. We will be next.	Comment noted.
94-208	8/12/22	Email	Sierra Club, Carole Farina	We can wait no longer! Please act now.	Comment noted.
94-209	8/12/22	Email	Sierra Club, Judith Doebke	Please act for all of us who cannot act for ourselves.. The nearby residential area deserves our protection and the Salton Sea is a vital wildlife migration stopover... Please help us. Thank you	Comment noted.
94-210	8/12/22	Email	Sierra Club, Jim Liskovec	We have visited the Salton Sea a number of times. We understand the great importance of preserving this special place for birds.	Comment noted.
94-211	8/12/22	Email	Sierra Club, Susan Pokorny	Such an important natural resource --- it deserves to be remediated.	Comment noted.
94-212	8/12/22	Email	Sierra Club, Mary Marks	Decades from now, this will still pay dividends.	Comment noted.
94-213	8/12/22	Email	Sierra Club, Jeffrey DeCristofaro	This MUST be done NOW!!! No more blocking, delays, denials, petty excuses or shady compromises behind our backs!!! If you don't push for this, we global environmental movements are prepared to hold you more than merely accountable for your criminal apathy and inactions and call out your crimes on a global scale!	Comment noted.
94-214	8/12/22	Email	Sierra Club, Kathleen Leslie Dunn	Although the Salton Sea was man made, it has been in place for so long many birds and other wildlife have grown to depend on it's presence. Please do what is necessary to preserve this resource.	Comment noted.
94-215	8/12/22	Email	Sierra Club, Kate Kenner	As I always say it is because of the actions of our species that birds/wildlife are in trouble; it is thus up to us to do all that is possible to help them survive and thrive. In this case that would be the U.S. Army Corps of Engineers working to help avians before it is too late	Comment noted.
94-216	8/12/22	Email	Sierra Club, Joanne Aasen	You know protecting this area is important. Please do the right thing.	Comment noted.
94-217	8/12/22	Email	Sierra Club, Dr. Kameron Leon	This is possible. It's not a lost cause but a chance to further future restorations. Our great earth needs this step.	Comment noted.
94-218	8/12/22	Email	Sierra Club, Marie Henley	It is not just about the birds it is about the health of our land, our planet, and so much more!!!!	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
94-219	8/12/22	Email	Sierra Club, Kristy Terry	We need your support!	Comment noted.
94-220	8/12/22	Email	Sierra Club, Dr. Paul Evans	I have personally seen a significant decline over the last 6 years I have lived in the Coachella Valley during the winter. I have seen good progress at Unit 1 but the Sonny Bono HQ area is dramatically worsened with losses of many water birds and diminution of diving birds due to increased salinity. We are losing this treasure from SoCal. Please do more to accelerate reclamation efforts. Time is running out!	Comment noted.
94-221	8/12/22	Email	Sierra Club, Susan Shields	I live in California and am concerned about the effects of global warming on the environment	Comment noted.
94-222	8/12/22	Email	Sierra Club, Linda Rocco	I am also concerned about the new development of DRILLING FOR LITHIUM under the surface of the Salton Sea, and its environmental impact on air quality, for birds, for residents nearby, and farther away in my city of San Diego.	Comment noted. Drilling for lithium is outside the scope of the SSMP 10-Year Plan. Refer to comment response 39.
94-223	8/12/22	Email	Sierra Club, Shirley Whitney	Only immediate action can provide such results.	Comment noted.
94-224	8/12/22	Email	Sierra Club, Beverly Scofield	Commonsense dictates that a decision be based on all the consequences resulting from the decision, both favorable and unfavorable. I have tried to research what the term "alternate LOP" means in regard to the Salton Sea. As usual, the legalize used leaves the ordinary citizen in the dark as to how it all works in practice. I only hope that as decisions are made that will affect the lives and livings of so many creatures, both avian and human, their needs will hold an important place in the list of considerations.	Comment noted.
94-225	8/12/22	Email	Sierra Club, Diana Soms	This seems especially important now with climate change rushing along	Comment noted.
94-226	8/12/22	Email	Sierra Club, Lynda Daniels	Help the Salton Sea!	Comment noted.
94-227	8/12/22	Email	Sierra Club, Marci Swager	Please save whatever wild wetlands California has left. We have been far too shortsighted in our destruction of these precious areas to this point.	Comment noted.
94-228	8/12/22	Email	Sierra Club, Malcolm Moore	A.CE., do something for the greater good for once!!!!!!	Comment noted.
95	8/1/22	Email	Erin Cali	It is not clear in the SSMP that how the current floodplains footprints and inundation patterns will be changing/affected under the effects of SSMP update impacts. The interactions, funding mechanisms, and collaboration between FEMA floodplain engagement were not clearly planned and defined in the Plan. There were also no systematic hydrology and hydraulics models that show-cased 100-yr and 200-yr (500-Year as well as 100-Year) floodplain delineations changes discussion under the Phase 1 Plan. We want to ensure Phase 1 represents the best benefits and safety of the surrounding communities.	Planning for flood impacts is expected to be addressed at a future detailed design phase of the individual projects, as was done during the design phase of the SCH project that is currently being constructed. Also, refer to comment response 68 regarding the federal feasibility study.
96-1	8/18/22	Letter via email	Imperial Irrigation District, Jessica Humes	<u>General Comments</u> 1. Proposed actions in the plan mention the use of canal water as a water source. There are two water districts in the vicinity of the Salton Sea; Coachella Valley Water District (CVWD) and IID. To request water from CVWD, please contact them accordingly. To request water from the IID, the project proponent should contact Tina Shields, IID Water Department Manager, at (760) 339-9038 or e-mail Ms. Shields at tshields@IID.com. The project proponent shall be responsible for all costs and mitigation measures related to providing water to the project.	Comment noted.
96-2	8/18/22	Letter via email	Imperial Irrigation District, Jessica Humes	2. IID maintains the position that IID retains rights to agricultural return flows from the New and Alamo rivers. To discuss water use agreements for the use of agricultural return flow for proposed projects, the project proponent should contact Tina Shields, IID Water Department Manager, at (760) 339-9038 or e-mail Ms. Shields at tshields@IID.com. The project proponent shall be responsible for all costs and mitigation measures related to providing return flow water to the project	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
96-3	8/18/22	Letter via email	Imperial Irrigation District, Jessica Humes	3. To request electrical service (temporary [construction activities] or permanent [station service]) for any project under the aegis of the SSMP 10-Year Plan, the project proponent should be advised to contact Gabriel Ramirez, IID Project Development Planner, at (760) 339-9257 or e-mail Mr. Ramirez at gramirez@IID.com to initiate the customer service application process. In addition to submitting a formal application (available for download at http://www.iid.com/home/showdocument?id=12923), the project proponent will be required submit a complete set of approved plans, including electrical plans; panel location, voltage requirement, electrical panel schedules, an AutoCAD file of the site plan, construction schedule, and the applicable fees, permits, easements and environmental compliance documentation pertaining to the provision of electrical service to the project. The project proponent shall be responsible for all costs and mitigation measures related to providing electrical service to the project.	Comment noted.
96-4	8/18/22	Letter via email	Imperial Irrigation District, Jessica Humes	4. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at https://www.iid.com/about-iid/departments-directory/real-estate . The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.	Comment noted.
96-5	8/18/22	Letter via email	Imperial Irrigation District, Jessica Humes	5. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities	Comment noted.
96-6	8/18/22	Letter via email	Imperial Irrigation District, Jessica Humes	6. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, water deliveries, canals, drains, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.	Comment noted.
96-7	8/18/22	Letter via email	Imperial Irrigation District, Jessica Humes	7. Dividing a project into two or more pieces and evaluating each piece in a separate environmental document (Piecemealing or Segmenting), rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. The State CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. CEQA case law has established general principles on project segmentation for different project types. For a project requiring construction of offsite infrastructure, the offsite infrastructure must be included in the project description. San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App. 4th 713.	Comment noted. Refer to comment response 68.

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96-8	8/18/22	Letter via email	Imperial Irrigation District, Jessica Humes	<u>Specific Comments</u> 1. The Draft EA states that the IID is implementing aquatic habitat restoration and dust control projects in Imperial County (See table, Cumulative Effects Summary 6-8). IID's environmental projects and programs are funded through the Quantification Settlement Agreement Joint Powers Authority (QSA JPA) to mitigate environmental impacts from water transfers from the Colorado river. Main projects include the Air Quality Mitigation Program, which focuses on dust suppression at various locations around the Salton Sea, and the Habitat Conservation Plan (HCP). The HCP encompasses multiple projects: Managed Marsh Complex, conservation programs for multiple protected species, desert pupfish refugium, selenium monitoring program, annual seepage recovery program, as well as public outreach and education. It is important that the project proponent coordinates with the IID, as we have similar projects being implemented in close proximity to one another.	Comment noted.
96-9	8/18/22	Letter via email	Imperial Irrigation District, Jessica Humes	2. Agricultural run-off water is listed as a source of brackish water for aquatic alternatives of the proposed project. With Colorado River water supply in high demand and increasing opportunities for water conservation, there is a possibility of agricultural drain water decreasing in the coming years, thus affecting the assumed supply of water.	Refer to updated Appendix C in this EA (was Appendix F in Draft EA), which has been revised to include additional modeling results and to present the water demand by individual project component and alternative, and different hydrology scenarios.
96-10	8/18/22	Letter via email	Imperial Irrigation District, Jessica Humes	3. Dust suppression projects propose to utilize groundwater wells to establish vegetation and/or suppress dust. The IID is currently performing groundwater studies to assess the availability and potential utility of groundwater in Imperial County. Increasing the volume of groundwater being pumped to the surface could potentially affect these assessments. Additional groundwater utilization should be considered in conjunction with existing groundwater pumping systems to accurately analyze availability of this resource.	Comment noted.
96-11	8/18/22	Letter via email	Imperial Irrigation District, Jessica Humes	4. The Desert Shores Channel Restoration Project consists of pumping water into an isolated portion of the sea along the Desert Shores Marina. With no outlet or continuous water flow, this water could easily be susceptible to harmful algal blooms, low dissolved oxygen concentrations and nuisance odors due to its stagnant state.	Comment noted.
97-01	8/20/22	Email	Jasmyn Phillips	<u>Aquatic Habitat</u> : With the uncertainty of water availability due to the effects of drought, climate change, chronic overuse of the Colorado River, and the time it takes to construct new habitat ponds, secure land access with non-state landowners, I propose the inclusion of two aquatic habitat projects of modest size at the northeastern part of the lake to help protect the piscivorous (fisheating) birds that rely on the Salton Sea ecosystem.	Comment noted. The North Lake Demonstration Project described in Section 3.3.1 (Aquatic Habitat Restoration Opportunity Areas) in the EA meets this recommendation by providing shallow- and deep-water fish and bird habitat.
97-02	8/20/22	Email	Jasmyn Phillips	<u>Aquatic Habitat (continued)</u> : As an avid bird photographer at the Salton Sea for over a decade, I've witnessed how the piscivorous birds are adversely affected by aquatic habitat degradation, loss and the drastic reduction in their food source, especially since the water transfers of 2003. I firmly believe it is vital to use and enhance existing wet habitat at the Salton Sea to fill the urgent need for deep water habitat areas with sufficient forage for piscivorous birds.	Comment noted. The Proposed Project and alternatives include a variety of aquatic habitats with varying depths that will provide habitat for a variety of bird species.
97-03	8/20/22	Email	Jasmyn Phillips	<u>Aquatic Habitat (continued)</u> : The Pelican Oasis Project Concept (document attached) would use existing ponds at the State Recreation Area and North Shore Yacht Club harbors and enhance their habitat value by creating a more usable and improved aquatic resource for fish and fish-eating birds.	Comment noted. Refer to comment response 97-01 which is in the same area as mentioned by the commenter.
97-04	8/20/22	Email	Jasmyn Phillips	<u>Aquatic Habitat (continued)</u> : The Concept aims to provide a wildlife sanctuary to help preserve the Pacific Flyway and Salton Sea fishery for piscivorous birds that use the lake year-round or during migration. This aquatic habitat would be located in Varner Harbor at the Salton Sea State Recreation Area, and the harbor at the North Shore Beach and Yacht Club. It would make use of the extant lagoons that already have a sustainable fresh or brackish water inflow, as evident from the vegetation growing in the vicinity. Preparation of project and site would include conducting any required environmental analyses, securing necessary permits, removal of invasive tamarisk, repairing floating dock structures and building a berm at the outflow channels to the Salton Sea, allowing the harbors to fill to sufficient depth.	Comment noted. Refer to comment response 97-01. In addition, the Audubon California Bombay Beach Wetland Project described in Section 3.3.1 (Aquatic Habitat Restoration Opportunity Areas) in the EA would stabilize and enhance existing wetland habitat areas, which is not far from the Salton Sea State Recreation Area.
97-05	8/20/22	Email	Jasmyn Phillips	<u>Aquatic Habitat (continued)</u> : Fish species that tolerate a wide range of salinity, water temperature, and dissolved oxygen levels such as tilapia, mullet and/or milkfish would be stocked in the harbor (along with the mosquitofish or sailfin mollies currently living in the harbor) and would provide excellent forage for piscivorous birds.	Comment noted.

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97-06	8/20/22	Email	Jasmyn Phillips	<u>Aquatic Habitat (continued)</u> : The addition of floating treatment wetland (FTW) islands that use salt-tolerant vetiver grass or other suitable vegetation would produce root systems that provide shelter for fish, oxygenate and moderate water temperature, help mitigate the negative impacts of nutrients (N, P) from drain inflow, control the frequency of algal blooms and sequester carbon	Comment noted. Various alternatives analyzed in the EA provide for islands and a variety of habitats ranging from mudflats to deep water habitat.
97-07	8/20/22	Email	Jasmyn Phillips	<u>Aquatic Habitat (continued)</u> : It is vital to protect the fishery that provides sustenance for migratory and resident piscivorous birds that utilize the Salton Sea such as pelicans, cormorants, herons, egrets, terns, grebes, skimmers, gulls and osprey. A variety of habitat and wildlife is what makes an ecosystem truly sustainable. Maintaining biodiversity is critical to the health of the Salton Sea, and by extension, the surrounding communities.	Refer to comment response 97-06.
97-08	8/20/22	Email	Jasmyn Phillips	<u>Aquatic Habitat (continued)</u> : The Concept also helps protect the beneficial uses of the Salton Sea. These include: preservation of rare, endangered or threatened species; wildlife habitat; warm water habitat; water contact recreation; non-contact recreation; aquaculture; freshwater replenishment of Salton Sea. The Pelican Oasis Project Concept would also be a complimentary or adjoining aquatic habitat to the North Lake Pilot Demonstration Project and could be implemented more quickly than larger projects with no clearly defined water source.	Comment noted.
97-09	8/20/22	Email	Jasmyn Phillips	<u>Hay bales/revegetation</u> : I spend significant time on the Salton Sea playa and observe high levels of self-propagation of native, salt-tolerant shrubs on the open areas as the lake recedes. In shoreline towns where there is an absence of agricultural activities especially along the western edge, I believe the use of hay bales to establish vegetation is unnecessary and creates a displeasing aesthetic. I have noted comments from many in the communities that have expressed their displeasure since the introduction of natural roughness in Salton City. A prominent concern aside from aesthetics is the fact that the hay bales actually increase recreational off-road activity around the hay bales, creating more fugitive dust. In addition, several issues were noted with the use of natural roughness at Owens Lake area in Keeler Dunes: scouring, destabilization, burial of the bales, and reduced effectiveness as dust control efficiency was only achieved in the center of the array (Effectiveness and Impacts of Dust Control Measures For Owens Lake, 2020). I would recommend the funds, energy use and water supplies for establishment of new vegetation instead be used to expand shallow wetland habitat near communities.	Straw bales have been placed on exposed lakebed in areas of high emissivity (dust generation) that may not be suitable for habitat enhancement. Vegetation enhancement is proposed in areas where adequate water is available.
97-10	8/20/22	Email	Jasmyn Phillips	<u>Alternatives 1, 2 and 3</u> : I strongly suggest the Desert Shores Channels Restoration Project be included in Alternatives 1, 2 and 3. I strongly suggest the Audubon California Bombay Beach Wetland Project be included in Alternative 3. I am one of many volunteers who have devoted their valuable time and energy to help get local, community restoration projects off the ground. It would be highly objectionable if the efforts and grant funds awarded were lost or reallocated.	Comment noted. The Desert Shores project is part of the Proposed Project but not part of the project alternatives. Alternative 3 is the North End/South End Aquatic Habitat Alternative and, as such, does not include aquatic habitat on the east and west sides of the Sea.
98-01	8/20/22	Letter via email	Mike Lynes, Salton Sea Partnership (includes Audubon, Sierra Club, Pacific Institute, Leadership Council for Environmental Justice, Environmental Defense Fund, and Allianz Coachella Valley)	On behalf of the undersigned, we submit the following comments on the draft Environmental Assessment (draft EA), pursuant to the federal notice dated June 21, 2022. Our organizations have been engaged in Salton Sea efforts for many years. Many of our organizations represent members that live in communities adjacent to the Salton Sea and are concerned about adverse impacts to public health and wildlife due to reduced water flows to the sea. We actively work with the California Natural Resources Agency ("CNRA") to improve and successfully implement its Salton Sea Management Program ("SSMP"). While progress and momentum for the SSMP has improved in the last two years, the program remains far behind schedule. We urge the Corps to conduct its analysis and issue a permit in a manner that flexibly accommodates a feasible timeline for SSMP projects and will not contribute to future delays.	Comment noted.
98-02	8/20/22	Letter via email	Mike Lynes, Salton Sea Partnership	Overall, we urge the Corps to act quickly to satisfy legal and procedural requirements and issue the necessary permit. Community residents are concerned that while the state is still determining how to plan, permit, and implement projects, public health and other environmental threats will expand and worsen. The Corps must also prioritize responsiveness to the State of California on SSMP issues as part of the Federal government's commitment to partner with the State on this issue.	Comment noted. The Species Habitat Conservation (SCH) project at the southern end of the Sea is currently under construction and various dust control and vegetation enhancement projects are underway at several sites on the east and west sides of the Sea.

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98-03	8/20/22	Letter via email	Mike Lynes, Salton Sea Partnership	Projects Must Prioritize the Protection of Local Environmental and Public Health. At its core, the SSMP is intended to protect the wellness of ecosystems and communities connected to the Salton Sea. The EA should analyze whether activities will undermine these goals. For example, The EA suggests that waste from construction and relevant work will be disposed of in local landfills (EA at 5-80, 5-82). The potential impacts of these actions on local public health and the surrounding environment should be thoroughly analyzed and reported in the EA. Avoidance and mitigation measures should be implemented and local communities should be made aware of any subsequent environmental threats.	Comment noted. Every construction project generates some waste, but it is not expected to be a large amount for these projects. The long-term benefits of these projects to local residents and wildlife outweigh the impacts to local landfills.
98-04	8/20/22	Letter via email	Mike Lynes, Salton Sea Partnership	The EA Must Evaluate Multi-benefit Infrastructure. At the direction of CNRA, we are providing comments regarding community amenities and multi-benefit infrastructure (MBI) included and evaluated to facilitate efficient and cohesive construction through the SSMP. The EA details that the inclusion of public use elements will be prioritized to the extent that they are compatible with the projects' goals to provide wildlife habitat and suppress dust, as well as within the management of the dust suppression area and aquatic habitat ponds (EA at 3-38). We acknowledge that CNRA is the agency responsible for designing and modifying project elements and that CNRA will continue to develop and revise these project elements if the Corps issues the necessary permits and approvals. We will continue to work with SSMP staff, outside this federal process, to ensure that MBI elements are incorporated into the design of all Salton Sea project elements.	The purpose of the Proposed Project is to create projects that provide wildlife habitat and suppress dust (see Section 2.0, Purpose and Need, of the EA). Some public use activities would be prioritized to the extent they are compatible with the purpose and need of the Proposed Project and with the management of the dust suppression areas and aquatic habitat ponds. Such activities, if determined to be compatible, may include picnicking, hiking, birdwatching, non-powered watercraft use, and hunting. Refer to comment response 52-34.
98-05	8/20/22	Letter via email	Mike Lynes, Salton Sea Partnership	With this in mind, we recommend the following public use elements to be incorporated into SSMP projects at large and near adjacent communities. These elements were identified in collaboration with residents from the communities of Coachella, Mecca, and North Shore, and are meant to provide additional mitigation benefits as well as improve public health, create recreational opportunities for local residents, and increase their access to the outdoors and the Salton Sea. To help communicate these elements visually, we have provided graphics created by Kounkuey Design Initiative (KDI) as Attachment A to this letter.	Thank you for your interest. Refer to comment response 98-04. The Corps is unable to consider graphic attachments as constituting submission of a comment for the purposes of the Corps' public comment period. Written comments are considered.
98-06	8/20/22	Letter via email	Mike Lynes, Salton Sea Partnership	Residents have identified that public use project elements and infrastructure must provide multiple benefits year-round through the enhancement of ecological systems, public health, climate resilience, and outdoor access while also mitigating dust exposure and protecting wildlife habitat. The following are examples of public use elements and multi-benefit infrastructure that should be incorporated and evaluated in the EA: <ul style="list-style-type: none">• Tables and benches for rest areas or viewing• Shade structures to protect from sun exposure and support community gatherings• Picnic areas and trails systems (minimum of one mile per trail) with green spaces, native plantings, and trees that could contribute to dust suppression work• Open areas meant for dust suppression projects can incorporate gravel or compact soil to simultaneously suppress dust and allow for public use as desired by the communities, as well as facilitate opportunities for community science, data gathering, and stewardship• Climate resiliency measures with green belts and greening infrastructure strategies throughout each project.• Educational programing like informational signage throughout projects• Viewpoints and bird blinds to allow for birdwatching and data collection• Infrastructure for boat and kayak access as identified in the North Lake Projects	Refer to comment response 98-04.
98-07	8/20/22	Letter via email	Mike Lynes, Salton Sea Partnership	Despite the restrictions detailed in the EA regarding the types of public use elements that can be considered, the inclusion of such amenities can help address the growing number of environmental issues being experienced in the Salton Sea region and are relevant to the stated purpose and need. Poor air quality, health impacts, climate change, and limited recreational spaces and access to the outdoors are all issues that can be addressed through MBI. The restoration of the Salton Sea must be inclusive of the broader benefits that it can bring to the surrounding communities. Projects such as these, in concert with dust suppression and other air quality projects, could significantly improve public health and well-being in the region and begin to address decades of disproportionate impacts. It is important that all developed projects are made accessible to the communities around the Sea by including transportation access, safety elements, and facilities that ensure ADA compliance.	Refer to comment response 98-04.

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98-08	8/20/22	Letter via email	Mike Lynes, Salton Sea Partnership	Conclusion As demonstrated by the analysis of Alternative 6 "No Federal Action" and Alternative 7 "No Action," public and environmental health will suffer significant adverse impacts absent expedited project implementation. We urge the Corps to issue the requested permit as quickly as possible. We will continue to work extensively with SSMP staff as it develops and modifies the 10-Year Plan to ensure that it meets statutory and contractual obligations to protect public and environmental health, but choose not to burden this process with refinements best addressed directly with the State of California.	Comment noted.
99-01	8/20/22	Letter via email	Nikola Lakic	I am thankful for the opportunity to comment several times during three virtual community meetings facilitated by U.S. Army Corps of Engineers (Corps), the Salton Sea Management Program (SSMP), and NEPA on July 7, 2022, and July 12, 2022. During meetings and reading the USACE Special Public Notice, I noticed several very serious flaws in the approach to solving the Salton Sea problem. I will elaborate on it in my comment further on. First of all, it is inspiring that the EPA and Army are announcing a series of engagement opportunities, including an opportunity for stakeholders and the public to provide written recommendations and a series of public meetings in August to hear perspectives on the rulemaking. Unfortunately, besides a good effort of some people working towards saving and restoring the Salton Sea, there is a group of influential people who work systematically towards just the opposite - getting rid of the Salton Sea. I know that such an assertion is hard to believe but I will elaborate on it in my comment further. Because of the unprecedented importance of saving and restoring the Salton Sea, our environment, clean air and water, health of nearby populations, and economy in general, and because most critical decisions regarding the Salton Sea have been, and still are, made behind closed doors, I am writing this letter to inform the public and those officials who have good intentions towards saving and restoring the Salton Sea, who might not be aware of the scam that is in process.	Comment noted. The Corps appreciates the commenter's thoughts and input but comments that are not pertaining to the EA for the SSMP 10-Year Plan or that are opinions, are noted for the record but do not warrant a specific response. Refer to public process described in Section 8.7 (Public Outreach and Involvement) of the Final EA. Coordination with agencies and Tribal governments is discussed in Sections 8.1 through 8.6 of the Final EA. Additional coordination with the five federal cooperating agencies involved in this project was conducted. The role of the cooperating agencies is discussed in Section 1.1 of the Final EA.
99-02	8/20/22	Letter via email	Nikola Lakic	The information in this letter is relevant to my case, but it helps to understand the whole situation. Without going into details about the history of the Salton Sea – in short – The Salton Sea is a dying Lake. The Lake was accidentally formed between 1905 – 1907 when one berm (dike) burst near the border with Arizona, California, and Mexico, and water from the Colorado River surged and filled a depression that is about 85 meters below sea level stabilizing water level at about 70 meters (220 feet) below sea level. The Salton Sea is in a desert about 200 miles from the Gulf of California (Sea of Cortez) on the south and about 200 miles from the Pacific Ocean on the northwest. In the 1950s and 60s, the Lake was a recreational center and tourist attraction. Now the Lake is saltier 50% than the Ocean. Because of drought and implementation of the Quantification Agreement Settlement (QSA) the Lake is shrinking, and an ecological disaster is inevitable with tremendous consequences to the environment, the health of the population, and the economy with enormous liabilities to the State.	Comment noted.
99-03	8/20/22	Letter via email	Nikola Lakic	<u>An overview of the current course of action:</u> The “current course of action” consists of two main projects that are in serious conflict – now - they are not coexistent (synchronized) a) Extraction of lithium from geothermal brine that is based on a smaller Lake that has exposed lakebed (playa) and requires related dust suppression projects and b) Restoration of the Salton Sea that is based on the importation of seawater. Those two concepts are in conflict because there is no logical explanation for continuing with a smaller Lake that would have 200 square miles of the exposed lakebed (playa) and related expensive dust suppression projects that are doomed to fail because there is no water to support such dust suppression projects, and at the same time talking about importing seawater that would flood those dust suppression projects. Also, there is no logical explanation for continuing with a smaller Lake and related dust suppression projects and having (achieved soon) importation of seawater.	Refer to comment responses 6 and 39.
99-04	8/20/22	Letter via email	Nikola Lakic	<u>The Problem of the situation:</u> The Imperial Irrigation District (IID) owns the most land in the southern part of the Salton Sea and promotes and supports the Smaller Lake concept so that they (IID) can use exposed lakebed (playa) for leasing their land to companies for harnessing geothermal energy, which is prevalent in the area, and for the cultivation of new land to be used for agriculture. There is also in the area a known geothermal reservoir with brine that can be used for the extraction of lithium. Two companies “Tetra-Tech”, and “Pacific Institute” are consulting companies for the State of California and are also under the strong influence of the IID and SSA.	Refer to comment response 39.

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99-05	8/20/22	Letter via email	Nikola Lakic	<p>After a request for information (RFI) for the restoration of the Salton Sea by the State through the California Natural Resource Agency (CNRA) in 2017, there have been 11 proposals submitted by the deadline on March 9, 2018. Presentations were made on May 21, 2018, and then evaluated by a group of supervisors of Imperial County.</p> <p>In 2021 the re-examination of the 11 initial proposals has been initiated by the State, and with the assistance of the University of Santa Cruz had been formed the Panel of independent reviewers was/is chaired by Dr. Rominder Suri and the principal investigator Professor Dr. Brant Haddad. The authors of the initial 11 proposals had an opportunity to update their original proposals if needed. Also was an opportunity for new proposals if there are. An additional 7 new proposals were submitted by the deadline of October 12, 2021. Since the authors of each proposal believe that its design is the best and needs to be implemented, the main purpose of the Panel was/is to evaluate all proposals and select the best one that is feasible, and most beneficiary to the restoration of the Salton Sea, environment, and nearby communities.</p> <p>There is also a group of influential people that promote and support the “current course of action” which is the “Smaller Lake” concept also called the “Perimeter/Brine Lake” designed by the Tetra-Tech. The Perimeter/Brine Lake has been accepted and approved by several agencies in 2016. The most vocal members of the group that support the “current course of action” and have been against the concept of the importation of seawater are Mr. Patrick O’Dowd, GM of SSA, and Director at CVWD, Mr. Ryan E. Kelley, Director at SSA and Supervisor at Imperial County, Mr. Manuel Perez, Director at SSA and Supervisor at Riverside County, Mr. William Brownlie, Chief Engineer at Tetra-Tech, which is a consulting company to the State, Mr. Michael Cohen, from Pacific Institute, which is also a consulting company to the State to mention a few. Hereinafter in this document, I will refer to them as “THEY”, “THEIR” or “THEM”. I will elaborate on their mission and their documented statement furthermore.</p>	Comment noted.
99-06	8/20/22	Letter via email	Nikola Lakic	<p>A few words about the dispute between me (my proposal) and “THEM”: I am a Graduate Engineer Architect and inventor. My expertise is in identifying the problem and finding the best solution for fixing the problem or providing a better solution mostly related to energy and the environment. In this case, the problem is relevant to incoming ecological disasters, the environment, the health of the population, and clean energy. I identified the problem and found a solution for the restoration of the Salton Sea in 2012 and proposed it on several occasions in 2013. On many occasions, I offered my proposal to, now deceased, Mr. Bruce Wilcox, then Assistant Secretary to CNRA with no positive response.</p> <p>I have been present in many SSA’s Board Meetings and workshops asking a simple question but never received an answer. The question was and still is: “What is the purpose of continuing with “Perimeter/Brine Lake” when it is well known that the final product is going to be a smaller, saltier, smellier, and more polluted Lake?” In my numerous public comments, I reluctantly used word “destruction” of the Lake, but if the final product is a smaller, saltier, smellier, and more polluted Lake that sooner or later would end up as a cesspool, then the “destruction of the Lake” is appropriate wording. Apparently, “THEY” do not like that I oppose their concept, expose their wrongdoing, and criticize their work.</p>	Comment noted.
99-07	8/20/22	Letter via email	Nikola Lakic	<p>About faultiness of the process of the Panel of independent reviewers: The fundamental duty (the main purpose) of the Panel of independent reviewers was/is to maintain their “independence”, integrity, and accountability to all participants especially to the State during the evaluation of the 11 initial proposals. The option for authors of the 11 initial proposals was to update (clarify) their original proposals from the 2018 submission if needed. Also, in fairness, was an option for submission of new proposals for those who believe that they have a valid proposal. Again, the option was for clarification (update), but not to make a radical change on their original proposal or to steal or modify someone’s else concept from the 2018 submission.</p>	Comment noted.

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99-08	8/20/22	Letter via email	Nikola Lakic	<p>In the first stage of the evaluation, the Panel excluded several proposals, rightfully so, that did not have importation of seawater in their proposal for the restoration of the Salton Sea.</p> <p>The second stage of the evaluation/exclusion was/is based on Fatal Flaws criteria. Unfortunately, with the Panel’s admission at the zoom meeting on July 20, 2022, the Panel lost its independent status, not just because of consulting with the Tetra-Tech (one of the opposing participants), but because the Panel accepted their advice for inserting strange criteria and then followed with the exclusion of only proposal that provides a solution for the restoration of the Salton Sea (my proposal) from further evaluation without logical explanation just because interfered with Tetra-Tech concept.</p> <p>Tetra-Tech is the main participant in this case. Tetra-Tech, with advice from the SSA and CNRA worked on the restoration of the Salton Sea for 20 years and proudly takes credit for the “Perimeter/Brine Lake” concept.</p> <p>Because of a fundamental breach of the Panel’s “independent” status by collaborating with the opposing side and refusing to review the only proposal that provides the solution for the restoration of the Salton Sea, the Panel’s evaluation results cannot be considered valid moving forward. It is a gross breach of trust. I will elaborate on it furthermore in this letter.</p>	Comment noted.
99-09	8/20/22	Letter via email	Nikola Lakic	<p>For those who want to verify my assertions here is a video from the meeting conducted on July 20, 2022.</p> <p>Video: Independent Review Panel Fatal Flaw Report Public Meeting – July 20 https://saltonsea.ca.gov/planning/water-importation-independent-review-panel/ Please pay attention to the answer of Dr. Brant Haddad after my comment at 1:19:07 – 1:26:50. He is talking about the relationship between the Panel and Tetra-Tech that is working with State on the Salton Sea solution. Also, he admits that he asked Tetra-Tech for their Salton Sea Management Program (SSMP) model that then the Panel used for analysis.</p>	Comment noted. The Corps is unable to consider a video or any views expressed in a video as constituting submittal of a comment for the purposes of the Corps public notice period.
99-10	8/20/22	Letter via email	Nikola Lakic	<p>I do not mean to be disrespectful to the Panel (Dr. Brant Haddad), but such a practice (conduct) is highly inappropriate and illegal. Here is his exact answer:</p> <p><i>“The most important thing that I can address Nikola in your comment has to do with the relationship between the Panel and Tetra-Tech. So, Tetra-Tech is consulting firm that is working with the State on its ... I guess you would call it the In Sea Solution – in any way – the Tetra-Tech is working with State on the Salton Sea issue and the independent review Panel is operating independently from Tetra-Tech and the only connection that we have with Tetra-Tech has been in asking them for their version of the SSMP model which then we used for our analyses. ...So, I think that we might have a training session where Tetra-Tech said here is how you use it But that is the extent of the relationship The rest of the analyses have been done by the Panel and its support team and the support team has included professors, graduate students from UC Santa Cruz as well as consultants firm Kennedy Jenks and Kennedy Jank’s subconsultants. So there has been a separation between the State and this project and we have really gone out of our way so that we maintain that wall ... so that the Panel is seen as independent”.</i></p> <p>I am pleased that the meeting has been recorded. This is unbelievable admission. It will be very useful in dismissing the Panel’s tasks and their results. This is a historic moment in the fight for saving the Salton Sea and is a defining moment for the Panel and the career of Professor Dr. Brand Haddad.</p> <p>Based on Panel’s (Dr. Brant Haddad’s) admission, on the record, that he collaborated with “THEM” (Tetra-Tech), and “their” recognizable wording through Fatal Flaw analyses arguments, it is obvious that the Panel succumbed to the pressure of the opposing party’s view. He was pretending that he was transparent, and objective, when in fact, he was just the opposite – after admitting that he had a training session with the Tetra-Tech where Tetra-Tech instructed him on how to proceed with their model, he then talked about how the Panel has gone out of their way so that they maintain that wall “... so that the Panel is seen as independent”.</p>	<p>Comment noted. The State has offered a response on the referenced panel and model: Providing information about the use of an accepted technical model is appropriate and legal. The referenced panel is made up of experts in their related fields who are more than qualified to review objectively the use of a technical model, its applicability, and the conclusions made from the results.</p> <p>Also, refer to comment response 55-3.</p>

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99-11	8/20/22	Letter via email	Nikola Lakic	Also, the Panel (Dr. Brant Haddad) during answering a question to Mr. Jason McBride said: “ <i>In the final report the Panel does recommend that there will be investments in emerging technologies and ideas that emerged from this process.</i> ” (Please see video segment 1:49:30 – 1:49:54). NOTE: Obviously, Dr. Brant Haddad in his statement above is talking about my technologies, because my proposal is the only proposal that introduces emerging technologies, but only <u>after</u> they excluded me from their further evaluation. It seems like “robbery” in the process on a massive scale. That is so inappropriate, transparent, naive, and illegal. It is well known that some people want to steal someone’s property, lie (change stories), breach contract, etc., – therefore we have locks on our doors, make signed and dated agreements, make patents, etc. From day one, I know the importance of my proposal to the nearby communities, the State of California, and future generations, so I made a patent application(s) of my concept for the restoration of the Salton Sea before I made the disclosure of it in front of some of “THEM”.	Comment noted.
99-12	8/20/22	Letter via email	Nikola Lakic	Dr. Brant Haddad talks about Panel’s limitations, and what they can and cannot do indicating that the Tetra-Tech has been State’s consulting agency for a long time, therefore they have the final word. After recent development, it is realistic to conclude that those ridiculous limitations (strange criteria) are imposed by Tetra-Tech for an ill-conceived reason to exclude my proposal from further evaluation. Based on Dr. Brant Haddad’s admission of having a “training session” with the Tetra Tech it is realistic to conclude that the Tetra-Tech uses its “consulting status” with the State as leverage to eliminate competing proposals so that they can continue with their ridiculous concept of the “Perimeter/Brine Lake” and related dust suppression projects. After this awkward and confusing process, a few logical questions for the Panel arise a) What was/is the purpose of the Panel of the “Independent” reviewers if it lost its independent, impartial, and objective status? and b) why lose a whole year and over \$2,000,000 for Panel’s service if the Panel just follow the order of the participant of opposing (competing) side?	Comment noted.
99-13	8/20/22	Letter via email	Nikola Lakic	<u>A few additional information about the lousy work of the Panel:</u> The main purpose of the Panel of independent reviewers was/is to evaluate the 11 initial proposals for the restoration of the Salton Sea. I was pleased and I praised the formation of the Panel of independent reviewers because was needed. I am very saddened to learn about the gross breach of the Panel’s trust and task. I am reluctant to criticize other proposals but at this late stage and in an emergency situation, I am sorry to say that most of the proposals should not be considered at all because none of them presented a solution for the restoration of the Salton Sea. Those three selected proposals for further evaluation have no solution either. They just borrowed “stole” my proposed corridor, to avoid the biosphere-restricted area, from my presentation in 2018. Also, they are not contractors, and never participated in any project even close to the size of this one – they are just offering their administrative services because they claim that they have connections in Mexico. NOTE: In my papers, I explained that a treaty with Mexico is needed and needs to be handled by the International Boundary and Water Commission and their counterpart in Mexico.	Comment noted.
99-14	8/20/22	Letter via email	Nikola Lakic	The conflict in the current situation is the existence of two conflicting projects and a third option: a) The “current course of action” which is the “Perimeter/Brine Lake” with related dust suppression projects that Tetra-Tech works on (and is the author of), which inevitably leads to the destruction of the Salton Seas with tremendous consequences; b) Lithium extraction from geothermal brine project that with the current design rely on the Smaller Lake concept. And the third option c) My proposal – Architectural Plan – the solution - that would, in addition to providing the solution for the continuation of extraction of lithium from geothermal brine without shrinking (destroying) the Lake, transfer such a grave situation into a clean environment and generate revenue in billions of dollars, prosperity to the local population and economy of the State in large. The conflict exists only because some people are shortsighted, egocentric, and not qualified for their current jobs.	Comment noted. Refer to comment responses 38 and 39.
99-15	8/20/22	Letter via email	Nikola Lakic	Another fundamental mistake of the Panel and the Tetra-Tech is - not understanding the purpose of the current investigation (evaluation). The purpose of the process was/is to evaluate the best proposal for the restoration of the Salton Sea – not to find a contractor who has the best connection in Mexico. It is obvious that the Panel collaborated with “THEM” too much.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-16	8/20/22	Letter via email	Nikola Lakic	Regarding the segment of importation of seawater that the Panel is supposedly focused on: It does not need a whole year for the evaluation of a dozen proposals especially when most of them are, sorry to say nonsensical, or amateurish exercises. All those proposals could be evaluated in less than one week by several appropriate expert(s) that have expertise in architecture (planning), civil engineering, and mechanical engineering - that understand Bernoulli's principles, thermos dynamic, etc. NOTE: We are in an emergency. This is not time for games, or for the Panel's academic exercise or amusement.	Comment noted.
99-17	8/20/22	Letter via email	Nikola Lakic	Another point explaining the lousy work of the Panel is that despite my argument proving to them that the Panel apparently did not understand my system for importing seawater at all. Based on Panel's comment (argument) in the first Fatal Flaw analysis, they did not understand where the calculation starts for the importation of the seawater. They did not understand why I have multi pipelines in the first segment of the pipeline. That is a fundamental mistake. One cannot proceed forward if one does not understand the fundamental component of the process. Instead of apologizing for their fundamental mistake being so off, or trying to understand how the system work, they brushed off my argument and proceeded with their argument based on the strange criteria of the Fatal Flaw and then quoted one of my sentences at the end where I am saying that <i>"I am aware that the Panel is not aware that these technologies have been used because they have not been used yet but, I am hoping that the Panel will realize the creativity, simplicity, and potential of such a concept that would benefit the project of restoration of the Salton Sea"</i> .	Comment noted.
99-18	8/20/22	Letter via email	Nikola Lakic	Refusing to review a proposal with an architectural plan (the solution) that solves all problems that we have, just because of strange criteria introduced by "THEM", prevents the Panel from fulfilling its original task. Such a decision to intentionally ignore my proposal is immature, self-degrading, and irresponsible. Obviously, Panel's priority was/is on winning the previous unsustainable argument for any price regardless of the result that would be harmful to the environment, the health of the nearby population, and the economy. That is a typical lobbyist mindset. Such a response (argument) by the Panel in this critical moment (situation) is highly irresponsible.	Comment noted.
99-19	8/20/22	Letter via email	Nikola Lakic	Also, despite my reply explaining that the speed of the fluid (seawater) in my system is not uncommon in the hydropower industry and that cavitation would not be an issue in my pipeline system. I explained that I made a sample for calculation for an easier understanding of the system and that we could always add a few more cascades to reduce hydrostatic pressure if needed (we have plenty of space for that), as I have explained in several illustrations in Route #2. They just ignored it and stayed with their previous decision.	Comment noted.
99-20	8/20/22	Letter via email	Nikola Lakic	Also, after the Panel's argument that <i>"The Panel is not aware that these technologies have been used to produce large volumes of desalinated water"</i> . I sent an additional clarifying illustration from my continuation-in-part patent pending application in which I am elaborating on it more. That is the same "closed loop system" that I am using in different applications (geothermal and solar) already explained in papers in my proposal for the restoration of the Salton Sea.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-21	8/20/22	Letter via email	Nikola Lakic	<p>I am including a copy of my response to the Panel’s invitation for revision with those additional illustrations (Figures 10-18) in the Addendum that I sent on July 1, 2022, (File 5+(VI) Harnessing Solar Energy).</p> <p>NOTE: This concept is so good that will change how we harness solar energy more efficiently, not just in the Salton Sea area and California, but worldwide in coastal cities that need potable water and electricity such as Cabo San Lucas. My system, using a “closed-loop system” generates electricity by using geothermal or solar energy (in this additional clarifying illustration – is solar) and having free byproducts - distilled (potable) water and concentrated brine that can be collected and used for the extraction of lithium. It is new, but it is based on the Law of Physics. There is nothing speculative about it. It is speculative only to those without an engineering background. Average high school students understand it. It uses Sun and seawater to produce, electricity, potable water, and concentrated brine that can be used to produce lithium. So, it is a win-win situation. That is not difficult to understand. There is no logical explanation for ignoringsuch an important element for the restoration of the Salton Sea just because “THEY” with help of the Panel inserted strange criteria that exclude it from consideration.</p>	Comment noted.
99-22	8/20/22	Letter via email	Nikola Lakic	<p>The absurdity of the situation is that the Panel whose fundamental duty was/is to evaluate proposals for the restoration of the Salton Sea to prevent incoming ecological disasters decided not to evaluate my proposal because “THEY” - Tetra-Tech, told them so. That is a gross breach of the Panel’s trust and task.</p> <p>NOTE: Based on the comment in the first Fatal Flaw analysis and lack of technical knowledge and lousy response, it is very possible that the Fatal Flaw analysis was written by a member of the Tetra-Tech team or a member of the SSA team.</p> <p>Here are links to that recent correspondence with the Panel:</p> <p>“The Salton Sea Independent Review Panel Fatal Flaw Report” https://transform.ucsc.edu/wp-content/uploads/2022/07/Salton-SeaIndependent-Review-Panel-Fatal-Flaw-Report.pdf. 5+(VI) Harnessing Solar Energy - Addendum - July 1, 2022 - - Copy.pdf Response to the Panel's decision - two Fatal Flaws - 6-20-2022 - Copy - Copy.pdf Response to Panel's decision after meeting on July 20, 2022 -Copy.pdf</p>	Comment noted.
99-23	8/20/22	Letter via email	Nikola Lakic	<p>The fact is that “THEY” (because in this case, “they” control the criteria and subsequently Panel) made the decision a long time ago to proceed with a “Smaller Lake” or “Perimeter/Brine Lake” and 10-Years plan, and this is just a necessary process that they need to pass through. Based on “THEIR” tactic and practice it is realistic to conclude that “THEY” believe that they can and should do the final decisions on the fate of the Salton Sea, without being challenged, especially now that they have control of the Panel and the State through State’s consulting groups that they control too.</p>	Comment noted.
99-24	8/20/22	Letter via email	Nikola Lakic	<p>Another point explaining the lousy work of the Panel is that after their “extensive” study they decided to exclude all proposals except three that illustrated a corridor for the pipeline from San Felipe in Mexico to the Salton Sea because those three proposals bypassed the biosphere-restricted zone. I am including the photo that I took from my screen during the meeting on July 20, 2022, showing those three corridors (routes) and their respectful companies (authors) titled “Routes that meet the Fatal Flaw criteria”.</p> <p>To use that criterion as a decisive disqualifying factor shows how immature and unprofessional the Panel’s work was/is.</p> <p>NOTE: Of course, bypassing the biosphere is an important factor - and I took care of it – but there are much more important elements to be considered – How to import seawater economically? What to do with seawater after importation? How to stop pollution? etc. The Panel simply ignores it or, very possible, sorry to say, has no necessary knowledge to evaluate it.</p>	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-25	8/20/22	Letter via email	Nikola Lakic	During the meeting on July 20, 2022, in the video accessible on page 4 above (please see 12:40 – 14:16), Dr. Brant Haddad said that “ <i>all three submissions have no Fatal Flaw – they passed <u>our</u> criteria of fatal flaw. They drew water from the North-Eastern side of the Sea of Cortez and delivered it to the Salton Sea</i> ”. He intended to say the North-Western side of the Sea of Cortez, but that is an unimportant lapse. He proceeded to say: “ <i>They avoided protected wetlands and biosphere reserves, and they are likely to receive necessary permits and permissions</i> ”. He also said that the “ <i>concepts met the minimum requirement for salinity for ecosystem restoration and for reduction of playa exposure</i> ”. NOTE: This is important. He did not say elimination of playa exposure. That clearly means that the Panel (Dr. Brant Haddad) accepts “Smaller Lake” or “Perimeter/Brine Lake” that Tetra-Tech promotes as a concept to follow. That is ridiculous. There is no logical explanation for continuing with the “Perimeter/Brine Lake” concept and dust suppression projects if we are about to import seawater. Again, that is a fundamental irreparable mistake of the Panel.	Comment noted.
99-26	8/20/22	Letter via email	Nikola Lakic	Also, in that video (recording) at one point Dr. Brant Haddad said during the meeting “ <i>that the Tetra-Tech has been the State’s consulting agency for a long time and that they know what they are doing</i> ”. Also, during the meeting, Dr. Haddad by answering the question from Mr. Jason McBride about the compensation for the effort put by those who worked on the proposals, said that he does not have the answer to that question and referred to - (paraphrasing) “ <i>There is a gentleman Jason Newcome, He works for the Department of Water Resources, and he has a very high level ... he is responsible for Salton Sea activities ... he writes for the SSMP will provide the response to this question</i> ” (See 1:53:44 – 1:54: 06). At one moment he indicated that “Mr. Jason McBride is in charge – he knows what to do” – referring, I think, to the Long-Range committee or SSMP 10-Years Plan (Please see video accessible on page 4 above). That implies that Mr. Jason McBride, a proponent of the “Perimeter/Brine Lake” is in charge of the State’s affairs and the fate of the Salton Sea. NOTE: There is a notion that when some people get transferred to different positions such as committee members, or directors, in some agencies that “somehow” the necessary expertise (knowledge) is transferred to them too. Unfortunately, that is a frequent practice, and it is mindboggling.	Comment noted.
99-27	8/20/22	Letter via email	Nikola Lakic	Dr. Haddad (Panel) and all involved should know that the architectural plan – the solution - the proposal for the restoration of the Salton Sea - for solving a complex problem - the project of enormous size and importance that will generate between \$500,000,000 - \$1,000,000,000 per year just from clean energy out of blue – literally – requires comprehensive design. For such an architectural plan, if accepted, there are architectural fees, whatever the fair market value is, as is standard practice in every similar project (For example – houses, skyscrapers, hospitals, industrial complexes, country clubs, golf courses, Panama Canal, Hoover Dam, etc.). I will elaborate on it in the closing segment. Therefore, stealing someone’s patented concept of this importance or participating in stealing, a segment or whole concept, is a serious violation of the laws (State, Federal, and even International PCT). Discussion about who is going to receive architectural fees for the project might be more appropriate at different times. There is a process for such determination and evaluation that involves illustrations, descriptions, claims, priority dates, etc., but now the focus should be on selecting the best proposal for preventing incoming ecological disasters and saving and restoring the Salton Sea.	Comment noted.
99-28	8/20/22	Letter via email	Nikola Lakic	Another strong point explaining the lousy work of the Panel is that after Panel’s “extensive” study and over \$2,000,000 paid for it, they “forgot” to check that in the initial presentations on May 21, 2018, in El Centro, those competing proposals (their authors) talked about the canal and tried to please (now deceased) Mr. Bruce Wilcox (present at the room at that time) with smaller Perimeter Lake, so that efforts up to 2018 would not be lost. Here is the link for the recording of that meeting: http://imperial.granicus.com/MediaPlayer.php?view_id=2&clip_id=1274	Comment noted. The Corps is unable to consider a video, or any views expressed in a video as constituting submittal of a comment for the purposes of the Corps public notice period.
99-29	8/20/22	Letter via email	Nikola Lakic	The deadline for the papers for the presentations was March 9 (12), 2018. After presentations in El Centro, on May 21, 2018, the papers have been published after the Summer of 2018. As I remember some papers were changed (altered) from the original papers submitted in March 2018. That is an illegal conduit.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-30	8/20/22	Letter via email	Nikola Lakic	<p>It is important to mention that the Panel failed to notice that my patented proposal, which is now excluded from their further evaluation, is the only proposal that documents a corridor for the pipeline from San Filipe to the Salton Sea. Although I included patent information in my papers, I also included that information in my response to Panel's invitation for the response after Panel's decision on two Fatal Flaws which I sent on July 1, 2022. I copy/past below that part of my letter.</p> <p>"I want to be sure that the Panel understands and will report to the State that I have several patents for importing seawater including division of the Lake into three sections and North Lake being one of them. See claims of the patents (U.S. Patent No. 9,995,286; Entitled: "Self-Contained In-Ground Geothermal Generator and Heat Exchanger with In-Line Pump and Several Alternative Applications; Issued on June 12, 2018; U.S. Patent No. 11,098,926; Entitled: "Self-Contained In-Ground Geothermal Generator and Heat Exchanger with In-Line Pump used in Several Alternative Applications including the Restoration of the Salton Sea. Issued on August 24, 2021, and several still pending applications) and that exclusion of my proposal without scientific reasoning leads to the opening court case, injection relief, etc."</p>	Comment noted.
99-31	8/20/22	Letter via email	Nikola Lakic	<p>I am including in the attachment my patent cover page and an illustration (Figure 50 from the patent) showing the corridor for a pipeline from San Filipe to the Salton Sea which was apparently a decisive factor in accepting those three competing proposals for further evaluation. They just blatantly ignored my proposal. Again, those competing three proposals borrowed "steal" my proposed corridor with slight modifications if any. That is a serious failure of the principal investigator Dr. Brant Haddad as is the whole process of the evaluation.</p> <p>NOTE: By the way, Panel's criteria to disqualify and/or qualify any proposal just because the biosphere-restricted zone is a very weak reason. There is a better way to bypass the restricted biosphere. I mentioned it in my response and elaborated on it in my continuation-in-part patent pending application. A more appropriate reason for disqualifying someone's proposal would be because it does not provide a solution for the restoration of the Salton Sea.</p>	Comment noted.
99-32	8/20/22	Letter via email	Nikola Lakic	<p>Also, it is important to point out that during the meeting on July 20, 2022, in the video accessible on page 4 above (see 12:40 – 14:16), Dr. Brant Haddad said that "<i>all three submissions (concepts) met the minimum requirement for salinity for ecosystem restoration</i>". That is an untruthful statement. Tera-Tech and the Panel do not understand that just importing seawater would not stop the pollution of the Salton Sea. The salinity would increase, and pollution would continue because the main pollutants are the New River and Alamo River which are contaminated with pesticides and fertilizers and partially treated sewer from Mexicali. By the way, again, those other competing proposals have no solution for the restoration of the Salton Sea. They do not elaborate on where importing seawater will go – what to do with additional salt, - how to stop pollution – what to do about wildlife sanctuaries. The Panel completely ignored it. Spending a whole year evaluating a dozen proposals and being paid over \$2,000,000 is ridiculous.</p> <p>NOTE: My proposal successfully deals with all those critical factors.</p>	Comment noted.
99-33	8/20/22	Letter via email	Nikola Lakic	<p>The essence of my proposal is the architectural design - the function of the concept. The mechanical elements in my proposal such are "In-Line Pump", "In-Line Generator", or "Power Unit" using steam and pistons are modified (improved) elements of known and proven technologies and can be produced by the same manufacturers of the conventional turbines and/or similar "power units" using the same material, technology, and necessary treatments if needed. There is nothing speculative about my proposal. My proposal and its components strictly follow the "law of physics".</p> <p>NOTE: It is important to say that, besides emerging technology (by the way old and proven technology in different applications) that the Tera-Tech and Panel apparently refuse to even consider, the main component of my concept is the architectural plan (design). The architectural plan can be used with conventional pumps and conventional solar panels. It would be less productive but still could function. My patented concept covers that option too.</p>	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-34	8/20/22	Letter via email	Nikola Lakic	Another strong point explaining the lousy work of the Panel is the following statement: “ <i>Technologies presented in this response for geothermal energy production, lithium recovery, groundwater extraction, and other recreational benefits were not reviewed as a part of this criterion</i> ”. After such a statement, the logical question arises: <u>Why not?</u> There is a submitted proposal (my proposal) that besides the importation of seawater has an architectural plan (the solution) that successfully deals with how to stop pollution of the Salton Sea - How to provide vertical circulation and clean the Salton Sea and provide conditions for tourism - How in process of desalination of the Lake, using both geothermal and solar energy which is prevalent in the area, generate electricity, potable water, and brine that can be used for extraction of lithium - How to provide huge wildlife sanctuaries - How to have a functional full Lake with the water level of the 1950s and 60s despite the reduction of inflow from the Colorado River because of implementation of the Quantification Settlement Agreement (QSA) enforced because of dry seasons (drought) - How to use limited water from the Colorado River and have recreational parks with smaller Lakes with circulating water (not ponds) and nearby fisheries.	Comment noted. Refer to comment responses 38 and 39.
99-35	8/20/22	Letter via email	Nikola Lakic	The Panel spend a whole year evaluating a dozen proposals (actually was only one proposal to be evaluated) for the restoration of the Salton Sea and received over \$2,000,000 for its lousy service but could not consult with appropriate potential contractors, - capable companies with the means such as AECOM, FLUOR, ORMAT, TENGDI MACHINERY, EQT, FUJI, GENERAL ELECTRIC, SIEMENS, ABB, MITSUBISHI, etc., to mention just a few, to verify the feasibility of the concept and technology proposed. Also, it is important to mention that the SSA has a budget of \$30,000,000 for doing “something” that is not in the interest of the Salton Sea nor the environment nor the health of the nearby population, or the economy of California. On the contrary, the SSA is doing intentionally the opposite of the State’s policies regarding resistance to climate changes, a clean environment, clean renewable energy, economy, etc. That says a lot about “THEIR” mindset and character.	Comment noted.
99-36	8/20/22	Letter via email	Nikola Lakic	If the situation was/is “normal”, the SSA could and should allocate or ask State for a few millions of dollars for testing several prototypes of my proposed technologies (hydro, solar, and geothermal) that they question, but it is obvious that “THEY” are not interested in restoring the Salton Sea. The answer to the question above “Why not?” is because the “Tetra-Tech” tells the Panel (Dr. Brant Haddad) not to do it because it would interfere with their ill-conceived plan of the “Perimeter/Brine Lake” on which they have been working for a long time. They are embarrassed to admit that they had been wrong, and now want to continue with some kind of hybrid solution that does not make sense either.	Comment noted.
99-37	8/20/22	Letter via email	Nikola Lakic	Also, there is no such thing as a “hybrid solution” that incorporates the Smaller Lake and dust suppression projects with the importation of seawater concept. There is no logical explanation for such a merger. I do not think that at this stage after all that is happening, could be any compromise. The focus should be on saving and restoring the Salton Sea and not to save someone’s ego and wrongdoing. NOTE: I am sorry to say it, but “THEY” are willing to pull with them into the abyss, the nearby communities, and the State with tremendous consequences and the State’s liability, just because of their ego and reluctance to admit their mistakes. Of course, they would like to continue working on some kind of hybrid solution for another 20 years and to receive from the State their consulting and designing fee. Someone needs to tell Tetra-Tech that the designing process is finished, and it is time for the implementation of the well-designed project.	Comment noted.
99-38	8/20/22	Letter via email	Nikola Lakic	It is obvious that “THEY” with front participants Tetra-Tech and Pacific Institute have neutralized the Panel of its power by using their status as State’s “consultants” as leverage and took over the evaluation of the proposals, making the Panel irrelevant, and making sure that my proposal, which is the only proposal that challenges “THEIR” concept of the destruction of the Salton Sea is out of consideration. That also says a lot about their character.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-39	8/20/22	Letter via email	Nikola Lakic	<p>By the way, my proposal does not introduce “<i>groundwater extraction</i>”. That is another fundamental mistake proving my assessment that “THEY” including the Panel did not study properly nor understood my proposal completely.</p> <p>NOTE: Such conduct by the Tetra-Tech, Pacific Institute, and Panel defines the blatant violation of principles of logic and discredits their expertise to the minimum. Unless “THEY”, the SSA, radically change their staff and approach regarding the Salton Sea and start working towards saving and restoring the Salton Sea instead of destroying it, I cannot see them as a helpful or functional organization participating in this project. The Salton Sea must be saved and restored. Based on their attitude so far it is realistic to conclude that they would raise the obstacles and be saboteurs in every step of the project.</p>	Comment noted.
99-40	8/20/22	Letter via email	Nikola Lakic	<p><u>Regarding scam and manipulative tactics:</u> The “manipulative tactics” are keeping the public, state, and federal officials intentionally misinformed about the existence of my proposal during the period when important decisions were made. Also, using wording, in their brochures and during workshops, such as “Smaller, Sustainable Lake”, and “Healthier Lake” – knowing very well that the truth is just the opposite – the truth is that with their concept, the Lake would be smaller, saltier, smellier, and more polluted every year and would inevitably end up as smaller sustainable cesspool. Also, supporting several “wishful thinking” and “speculative” concepts just to “muddy the water” with the purpose to distract attention and reduce the precious time for discussion of the real solution that interfered with the concept that they initiated and supported. Also, along this line, it is important to mention that ignoring my concept since 2013, and systematically avoiding the dialog explains their recently revealed intentions.</p>	Comment noted.
99-41	8/20/22	Letter via email	Nikola Lakic	<p><u>A few additional relevant observations and suggestions:</u> Regarding the Panel’s argument based on “strange criteria” because of immediacy and only proven technologies can be used. First, the term “proven technologies” as a disqualifier against the implementation of my proposal is not a valid argument because the essence of my proposal is creativity - an architectural plan that incorporates several emerging technologies of which elements have been proven for hundreds of years in different applications.</p> <p>At this junction, relative to immediacy, emergency, and “not proven technology”, I would like to mention that I am proud to say that my proposal for controlling the dysfunctional “Blow out Preventer” (BOP) and an uncontrollable surge of crude oil in the Gulf of Mexico after the accident on April 20, 2010, was understood relatively fast, built, and implemented at the dept of several miles. An uncontrollable surge of oil was stopped on July 15, 2010, only 34 days after my submission and 86 days after the accident.</p>	Comment noted.
99-42	8/20/22	Letter via email	Nikola Lakic	<p>By the way “THEY” used the same argument about emergency, immediacy, and no proven technologies four years ago. It is obvious that “THEY” are not interested in saving and restoring the Salton Sea.</p> <p>NOTE: I would like to mention an interesting analogy appropriate here - If “THEY” with their mindset worked for NASA in the 1960s, we would never go to the Moon because it has never been done before, and sorry to say, “THEY” cannot read a blueprint nor understand a simple calculation. A wise saying would be also appropriate here: “Those who say, “cannot be done” should not stop those who are doing it”. Sadly, and the funny part of all of this is that clumsy stealing is in process.</p>	Comment noted.
99-43	8/20/22	Letter via email	Nikola Lakic	<p>Also, their frequent comments regarding the importation of seawater from Long Beach such as: “<i>It is too complicated because requires substantial paperwork and permits</i>” - is not a scientific answer and cannot sustain. Also, their comment regarding the importation of seawater from the Sea of Cortez such as: “<i>It is too complicated because requires a treaty with Mexico</i>” - is not a scientific answer and cannot sustain. Such answers are an easy way out without working on it, by people who worry only about their salaries and bonuses, and who do not understand the situation or benefits of it in the short or long term.</p>	Comment noted.
99-44	8/20/22	Letter via email	Nikola Lakic	<p>Also, it is important to mention that during one meeting (workshop) at which I was present, the panel said that they had no obligation to answer any question – they just collected public comments. It is obvious that they then ignore those public comments. That is a serious faultiness of the process.</p>	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-45	8/20/22	Letter via email	Nikola Lakic	By succumbing to the pressure of “THEM” the Panel made a fundamental mistake that is impossible to repair at this point. If needed I would be glad to have a debate (conversation), if a such event can be organized, on equal terms, preferably taped, between me and “experts” from Tetra-Tech, Pacific Institute, and Panel, and those who oppose my proposal and support the destruction of the Salton Sea. It is time for “THEM” to speak openly and be cross-examined by someone who understands the situation so that everyone can hear their answers without hiding behind those (puppets) that represent them at certain committees and workshops that cannot answer a single question at the appropriate time without consulting with their bosses (puppeteers) and always giving vague answers.	Comment noted.
99-46	8/20/22	Letter via email	Nikola Lakic	<u>A few additional information about “THEIR” statements which are well documented (recorded presentations) that openly oppose the importation of seawater:</u> It is mind-boggling and highly inappropriate that those who are and have been, against the importation of seawater into the Salton Sea now are evidently in charge of the evaluation of the proposals for the importation of seawater. That is serious contamination of the process of the evaluation of the proposals for the restoration of the Salton Sea that leads to disastrous results.	Comment noted.
99-47	8/20/22	Letter via email	Nikola Lakic	Tetra-Tech is and has been openly against the importation of seawater for a long time. Here is the link to their 2022 annular report regarding SSMP: 2022-AnnualReport_English_Feb-24-2022_Final.pdf. In this recent report, they do not even mention the importation of seawater because it is not in their minds. At the SSA’ Board meeting via Zoom Webinar conducted on June 25, 2020, after has been mentioned his possible retirement, when asked by Director Patrick O’Dowd and Chairman Estrada, about the quality of water, Tetra-Tech’s Leading Engineer Mr. William Brownlie answered (paraphrasing question and the answer) “ <i>What are you leaving us regarding the Salton Sea?</i> ” On the screen was North Lake. He answered: “ <i>Possible boating, No fishing, and No swimming</i> ”. That was the truthful short answer that explains everything. “NO Swimming” means the Lake will be polluted. Everyone with common sense knows that. Also, Mr. Brownlie reinstated that North Lake will be supplied with runoff water from nearby farmland. NOTE: That is completely the opposite of what I am proposing.	Comment noted.
99-48	8/20/22	Letter via email	Nikola Lakic	Also, it is important to mention that Dr. Michael Cohen from Pacific Institute, a consulting firm for the State of California, located in Boulder Colorado, published a video on YouTube (about 12 minutes long) with the title “Salton Sea Import/Export”, the subtitle “Sea to Sea Plans” explaining why importing seawater is <u>not</u> a good idea. I am thankful that such a video exists. It helps me to explain the challenges that I faced when I started to work on this project and helps others to understand the importance and the value of my proposal. In his video, Mr. Cohen conveys conventional thinking that has been around last 50 years explaining why importing seawater and saving the Salton Sea is not a feasible idea. Please watch his video – it is only 9 minutes and 27 seconds. Here is the link to his video. https://www.youtube.com/watch?v=BnRoM22mEZ4 .	Comment noted. The Corps is unable to consider a video, or any views expressed in a video as constituting submittal of a comment for the purposes of the Corps public notice period.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-49	8/20/22	Letter via email	Nikola Lakic	<p>I have summarized his video in the timeframe below. (I added question marks (?) after questionable statements). Here is the timeframe:</p> <p>–1:30 -1:40 – shows a diagram of elevation decrease and salinity increase.</p> <p>–1:40 - 2:20 – shows what to expect if nothing is done.</p> <p>–3:31 - 4:29 – Pacific Route Estimate. Would need 16 pipelines (?) Cost at least \$40 billion + annual energy and maintenance cost about \$1 billion per year (?).</p> <p>–4:30 - 5:50 – Gulf of California Rout Estimate. Would need 16 pipelines (?). More than 270 feet elevation to overcome (?). The energy needed: 80 GWh/year per 300,000 AF (acres feet) pipeline (?) Cost \$49 billion but less the \$1 billion per year for maintenance cost (?).</p> <p>–5:50 - 6:48 – Talks about the difficulties of adding imported salt to an already salty Lake (?).</p> <p>–6:48 - 7:43 – Talks about very expensive Reverse Osmoses plant(s) proposed for desalinization of the Lake costing \$6 billion(?) It would require 270 MW to operate (almost 50 % of geothermal capacity in Imperial valley) (?).</p> <p>–7:45 - 8:27 – Talks about the timeline from start to finish 30 years(?). (NOTE: He is right about 10 years for design - It took me about that time).</p> <p>–8:27 - 9:00 – Talk about 10 years needed to stabilize the Lake water surface (?). (concluding “we do not have that kind of time”) (?).</p> <p>–9:00 - 9:26 – Talk about “Sea -to- Sea” problems. High infrastructure and maintenance costs (?). High energy requirements and cost (?). The Gulf route would require a new treaty w/ Mexico. Would not stabilize the Salton Sea before 2045 (?). No funding is available (?). He is concluding that importing seawater distracts attention from the feasible practical plan as can be built quickly and can show results in near future – “<i>we need to support a “plan that can work”. “Although importing seawater plans are intuitive and appealing, they are not the answer to the imminent collapse of the Salton Sea”.</i> Mr. Michael Cohen failed to explain in his video what is the “plan that can work”.</p>	Comment noted.
99-50	8/20/22	Letter via email	Nikola Lakic	<p>At the BOARD MEETING/ WORKSHOPS – about the progress of the SSMP and public input – conducted on April 7, 2021, at which I participated, GM, Executive Director of the SSA, Patrick O'Dowd made a presentation of about 15 minutes. Sorry to say, but it was pathetic seeing GM Patrick O'Dowd talking about “Pillars, Priorities, and People” in his presentation. He talked about how the SSA <i>was formed in 1993, to exercise common power, directing and coordinating actions relating to improving water quality and stabilization of water elevation, and enhancing the recreational and economic development of the Salton Sea.</i> He talked about the <i>promising future of the Salton Sea.</i> He talked about <i>ensuring human health and safety as the highest priority</i> – mentioning the <i>moral imperative</i>. He talked about <i>vibrant sustainable communities</i>. He talked about how <i>preserving the ecosystem for future generations is essential</i>. He talked about <i>revitalizing and restoring habitats and wetlands caused by the “aging” of the Sea.</i> He talked about <i>Health, Habitat, and Opportunities (Salton Sea’s H2O).</i> He talked about “... <i>from what it once was to what it sustainably can be</i>”. He talked about “<i>The Big Idea</i>” – <i>the backbone on which current and future projects will be fettered</i>”. Then he mentioned how <i>over the years many proposals including proposals for importing seawater were proposed and each seriously studied but the final selection of such projects has been elusive</i>. Then he talked about “<i>the SSA’s study selecting the “Perimeter/Brine Lake” as the best solution and how it was endorsed by many agencies and every community, especially by the Pacific Institute (Michael Cohen)</i>”.</p>	Comment noted.

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99-51	8/20/22	Letter via email	Nikola Lakic	<p>Then he talked about Members, Partners, and Stakeholders. Then he talked about the definition of “Authority” – <i>“the power to influence or command thought, opinion, or behavior”</i>. He also said that <i>“by definition, it is his (their) job”</i>. I am not sure what he meant by such a comment.</p> <p>Also, at that time Patrick O’Dowd starts using the term “Perimeter Lake” instead term “Perimeter/Brine Lake” which was officially accepted in 2016 and used when asking for funding. He thinks that the big gray area in the middle of his illustration is not noticeable. That is an area where the Brine Lake (cesspool) will accumulate.</p> <p>It is mind-boggling that a key person of the SSA, and supposedly an intelligent man, can say so many contradictions and false statements in 15 minutes. I have underlined a few contradictions in the paragraph above paraphrasing his statement from the presentation. Everything that GM Patrick O’Dowd said during his presentation was false. That is because everything they (the SSA) did and still do is based on the false assumption that importing seawater is not a feasible concept. Also, their policy was/is based on manipulations and an ill-conceived concept.</p> <p>Because most people have no engineering background and because Patrick O’Dowd’s presentation was relevant to my dispute with members of the SSA that most participants might not be aware of, it was/is my moral obligation to expose the falseness of the SSA’s practice and Mr. Patrick O’Dowd’s presentation.</p> <p>NOTE: I openly criticize their actions and I welcome everyone to challenge my proposal.</p>	Comment noted.
99-52	8/20/22	Letter via email	Nikola Lakic	<p>In describing the 11 proposals for the restoration of the Salton Sea including my proposal, submitted in 2018, GM Patrick O’Dowd used the word “ELUSIVE”. The meaning of the word “Elusive” is - indefinable, mysterious, vague, obscure, tenuous, and speculative. My proposal is based on the law of physics and is elusive and speculative only to those who lack basic technical knowledge and have no desire to learn about it.</p> <p>I would like to clarify that the term “Elusive” might apply to the remaining 10 proposals, but not to my proposal. My proposal was/is thoroughly done, with several alternative options (for comparisons and the final evaluation), having over 130 slides and explained in detail. An average high school student could understand it in a relatively short time if read thoroughly. I am emphasizing this because the concept of my proposal has been around since 2013. I spoke with most of the SSA’s Board Members in a short burst on numerous occasions. I also spoke with several of them in their offices (at least an hour) – they seem to like it – but when they are together as Bord Members some “mysterious” power unites them against it and makes them silent. After recent development that “mysterious” power is not mysterious anymore.</p>	Comment noted.
99-53	8/20/22	Letter via email	Nikola Lakic	<p>Also, I would like to clarify, because many participants of the Workshop and public might not know, that I frequently read my 3-minutes “Public Comments” on monthly SSA’s Board Meetings, telling them, for the record, about the existence of my proposal, and telling them that they are going in the wrong direction by promoting and supporting the “current course of action” that leads to the destruction of the Salton Sea, and offering them my expertise and time for the presentation and to answer any question that they might have. Unfortunately, they systematically ignored my offers. GM Patrick O’Dowd also during one of the SSA Board Meetings, (televised and recorded) described my proposal as “Not Feasible” without asking me ever a single question. My proposal is a comprehensive architectural plan that requires some reading and basic technical knowledge. I doubt that he ever read it or understood it completely.</p>	Comment noted.
99-54	8/20/22	Letter via email	Nikola Lakic	<p>It is highly inappropriate that GM Patrick O’Dowd – after my numerous attempts to explain to him/them my proposal and his/their numerous rejections to learn about it – describes my work as “Elusive” in his presentation. The truth is that they are on their mission to get rid of the Lake and my proposal interfered with their mission.</p> <p>Also, during the Workshop, it was noticeable the comment by Mr. Michael Cohen from Pacific Institute. He spoke right after I read my “Public Comment”. It was close to the end of the Workshop. He praised Patrick O’Dowd for his presentation. Based on previous interactions - they are together on the same mission – Unfortunately, they complement each other frequently.</p>	Comment noted.

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99-55	8/20/22	Letter via email	Nikola Lakic	<p>Also, it came to my attention the article titled: “In search of ‘Lithium Valley’: why energy companies see riches in the California Desert”. In this article Mr. Rod Colwell, from Controlled Geothermal Sources, Commissioner at Lithium Valley Commission, and friend of Vice-chair Mr. Ryan Kelley was quoted saying the following - referring to shrinkage of the Lake: “<i>Let private enterprise deal with it</i>”. Also, he said, “<i>We’re trying to commercialize an environmental disaster.</i>” Also, was written, “<i>Colwell keeps track of the Salton Sea’s water levels because as it evaporates, more land becomes available for Controlled Thermal Resources</i>”.</p> <p>This article reinforces (proves) my assertions that I stated in my numerous public comments. Here is the link to the article: https://www.theguardian.com/usnews/2021/sep/27/salton-sea-california-lithium-mining.</p>	Comment noted.
99-56	8/20/22	Letter via email	Nikola Lakic	<p><u>An important comment relevant to the situation by a Conservation Consultant.</u> At the Salton Sea Authority – BOARD OF DIRECTORS MEETING – Thursday, May 23, 2019, I was present at the meeting when Ms. Linda Moore, Conservation Consultant, during “Federal Issues Update” made a comment. She was/is representing the Salton Sea Authority in Washington D.C. At one moment she said, paraphrasing someone from Federal Office in Washington, DC, responding to her request for the funding: “<i>You are asking for money, but you don’t have a plan</i>”. That was an excellent and truthful point that I am often bringing on. One Board Member commented that they have “Perimeter/Brine Lake” and that they need to improve their effort toward achieving Federal funding. The board members continued with the next topic on the agenda unconcerned or not understanding that they are asking for money for a project that is expensive, not feasible, and does not do any good to the Salton Sea, the environment, the health of the population, economy, etc., and is doomed to fail.</p>	Comment noted.
99-57	8/20/22	Letter via email	Nikola Lakic	<p><u>A few words about nonsensical projects that are already in process or in planning.</u> Here is the link to the “2022 Annual Report on the Salton Sea Management Program” 2022-Annual-Report_English_Feb-24-2022_Final.pdf</p> <p>In this report is shown the “<i>Desert Shore Channel Restoration Project</i>” (See Figure 12). In description it says: “<i>The Desert Shores Channel Restoration Project is included as a project in the 10-Year Plan NEPA EA. The project is located adjacent to the Desert K699 Shores community in the marina that has become disconnected from the Sea (Figure 12). Implementation of the Desert Shores Channel Restoration Project would refill the five southernmost boat channels in the Desert Shores Marina. The team has collaborated with Imperial County, Imperial County Air Pollution Control District, Reclamation and the Salton Sea Authority to advance the Desert Shores Channel Restoration Project. The project would create habitat and suppress dust by refilling currently dewatered channels with water at a salinity level that provides habitat for fish and supports piscivorous birds</i>”.</p> <p>It also states: “<i>The project aims to meet the project goals of habitat restoration and dust suppression by refilling the channels with water at a salinity level that provides habitat for fish and birds. In addition, habitat benefits are anticipated through revegetation. The project would construct a berm across the former boat channel connection to the Salton Sea. Water would then be pumped from wells into the channels contained by the berm at a rate sufficient to refill the channels, offset losses from evaporation and seepage, and circulate water</i>”.</p> <p>NOTE: This is a nonsensical project. I will elaborate on it further below</p>	Comment noted.
99-58	8/20/22	Letter via email	Nikola Lakic	<p>Also, besides those nonsensical dust suppression projects, there is a North Lake Pilot Project (See Figure 12) In the description it says: “<i>In April 2021, the State entered a \$19.25M (Prop 68) funding agreement with the Salton Sea Authority (SSA) to plan and construct the North Lake Pilot Demonstration Project</i>” It also says “<i>The project will provide both shallow and deepwater habitat, suppress dust by the creation of the lake, and provide recreational benefits. The project could be designed as either freshwater or brackish water habitat.</i>”</p> <p>It also says: “<i>This project could be integrated into a larger North Lake concept, described as a separate project below</i>”.</p> <p>NOTE: This is an unnecessary project. I will elaborate on it further below.</p>	Comment noted.
99-59	8/20/22	Letter via email	Nikola Lakic	<p>Also, please see Figure 1, Landownership around the Salton Sea. It might help in understanding this complicated situation.</p>	Comment noted.

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99-60	8/20/22	Letter via email	Nikola Lakic	Here is the link to my response to the “2022 Annual Report on the Salton Sea Management Program” that I filed on March 15, 2022. Response to the “2022 Annual Report on the Salton Sea Management Program”- - Copy.pdf	Comment noted. The Corps is unable to consider a video, or any views expressed in a video as constituting submittal of a comment for the purposes of the Corps public notice period.
99-61	8/20/22	Letter via email	Nikola Lakic	In my response to the “2022 Annual Report on the Salton Sea Management Program”, I have pointed out the faultiness of it. Please read it. To be handy, here below, are copy/paste a few comments from my response: <u>A few observations</u> : Although the 2022 Annual Report is a nice colorful presentation with plenty of useful information - reporting on the progress of the “current course of action” - the projects already underway to restore exposed lakebed sites - such effort is fundamentally wrong (non-sensical) because the “current course of action” is based on the acceptance of the false assumption that shrinkage of the Lake is the only and inevitable course and that there is no answer to the imminent collapse of the Salton Sea. Also, this report does not mention the consequences that will follow if the “current course of action” does not mention. (For this occasion, this paragraph is referred to – The second reference).	Comment noted.
99-62	8/20/22	Letter via email	Nikola Lakic	In the Report is mentioned the existence of an independent panel of experts to evaluate the feasibility of a range of proposals for water importation from the Ocean. (For this occasion, this paragraph is referred to – The third reference).	Comment noted.
99-63	8/20/22	Letter via email	Nikola Lakic	In the Report is mentioned the North Lake Pilot Project. (For this occasion, this paragraph is referred to – The fourth reference).	Comment noted.
99-64	8/20/22	Letter via email	Nikola Lakic	In the Report the “Desert Shores Channel Restoration Project” is mentioned. (For this occasion, this paragraph is referred to – The fifth reference).	Comment noted.
99-65	8/20/22	Letter via email	Nikola Lakic	In the Report are mentioned “Community Engagement Meetings” - “Long-Range Plan Meetings” – “Monitoring Implementation Plan Meetings”, etc. (For this occasion, this paragraph is referred to – The sixth reference).	Comment noted.
99-66	8/20/22	Letter via email	Nikola Lakic	In the Report is written the following: “The SSMP is seeking to formalize its coordination with IID in order to plan, implement, and monitor dust suppression projects around the Salton Sea. Close coordination with IID will allow the SSMP Team to continue to learn from IID’s experience.” (For this occasion, this paragraph is referred to – The seventh reference).	Comment noted.
99-67	8/20/22	Letter via email	Nikola Lakic	In the Report is written the following: “Monitoring is required to quantitatively evaluate performance effectiveness of dust controls. Measurements are needed at multiple locations to understand natural and anthropogenic causes of dust and sand transport variability for surfaces.”(For this occasion, this paragraph is referred to – The eight reference).	Comment noted.
99-68	8/20/22	Letter via email	Nikola Lakic	In the Report is written the following: “ <i>Environmental Planning Federal approvals for SSMP projects must be secured to implement any of these projects on federal lands or that require a permit from a federal agency. Accordingly, our team is working with the U.S. Army Corps of 40 Annual Report on the Salton Sea Management Program Engineers (Corps), as the federal lead agency and five federal Cooperating Agencies (U.S. Bureau of Reclamation, Reclamation; U.S. Bureau of Land Management, BLM; U.S. Fish and Wildlife Service, USFWS; Bureau of Indian Affairs, BIA; Natural Resources Conservation Service, NRCS) to prepare an Environmental Assessment (EA) for the Phase I: 10 -Year Plan. The EA will provide NEPA compliance for up to 30,000 acres of habitat and dust suppression projects as well as coverage for a Watershed Plan that will allow eligible projects to qualify for \$25M of federal farm bill funding through the U.S. Department of Agriculture, NRCS. This environmental document will cover projects and activities such as creation of aquatic habitat at the Alamo, New and Whitewater Rivers, the North Lake Pilot Demonstration Project, the Desert Shores Channel Restoration Project, the Audubon Wetland Restoration Project, as well as a variety of other dust suppression and habitat projects (Figure 16).</i>	Comment noted.

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99-69	8/20/22			Completion of this comprehensive NEPA process upfront will allow the SSMP Team to seek federal permits and access rights to implement projects on federal lands faster than would be possible by undergoing NEPA compliance for each project individually. The draft Project Description for the Phase I: 10-Year Plan was released to the public in August 2020 for a 30-day comment period. Through this process, the SSMP Team sought additional public input to further refine the draft Project Description and identify a range of project alternatives to be considered in the EA. The State also sought feedback as to how the public would like to access the Sea and what compatible community amenities should be prioritized. The SSMP Team held three virtual public meetings. Approximately 400 pages of oral and written comments and attachments were received and subsequently posted on the website. The Corps initiated the formal NEPA scoping process in March 2021 by releasing an updated project description for public review. Going forward, the Draft EA will be released for public review in the first quarter of 2022, and the Corps will hold 2-3 public meetings during the review period. The EA is scheduled to be completed in the third quarter of 2022.”(Underlining added). (For this occasion, this paragraph is referred to – The night reference).	Comment noted.
99-70	8/20/22	Letter via email	Nikola Lakic	<u>My comment</u> : Regarding the second reference above, - It is a fundamentally wrong (nonsensical) direction. I would like to elaborate on why the “current course of action” - the projects already underway to restore exposed lakebed sites - namely - Vegetation Enhancement Projects, Clubhouse, Tule Wash, Bombay Beach, Species Conservation Habitat (SCH), etc. are non-sensical.	Comment noted.
99-71	8/20/22	Letter via email	Nikola Lakic	It is noticeable that the State has no architects or civil engineers, with the necessary expertise and experience, involved in the restoration of the Salton Sea, but rather Environmental Scientists, biologists, chemists, administrators, etc. “playing” architects (no pun intended). An analogy could be made – by selecting a plumber and electrician to perform bypass surgery on a patient in need because they have experience with piping, leakage, and electricity (again, no pun intended).	Comment noted.
99-72	8/20/22	Letter via email	Nikola Lakic	The best way to explain why the “current course of action” is nonsensical is by asking proponents of such projects (the State) several questions. The projects that are already underway to restore exposed lakebed sites – namely - the (Vegetation Enhancement Projects) – (Clubhouse 400- acres; Tule Wash 1,245 acres; Bombay Beach 90 acres); Species Conservation Habitat (SCH) project 4,100-acre. That summarizes 5,805 acres or 9 square miles. It is difficult to find necessary water to help protect and facilitate plants growth and plants survival and if the “current course of action” continues (if is not stopped) – will be, relatively soon, about 200 square miles of lakebed exposed. Question 1 : How do you plan to manage 200 square miles of exposed lakebed if you have difficulties (finding water) managing only 9 square miles?	Comment noted.
99-73	8/20/22	Letter via email	Nikola Lakic	Regarding the third reference above - an independent panel of experts: It is obvious from the SSMP's Program update and the Report and the actions already underway that the management in collaboration with the (US Bureau of Reclamation, Salton Sea Authority (SSA), Riverside County, Imperial County, Coachella Valley Water District (CVWD), and IID – have already indirectly excluded importation of the seawater as a feasible solution – because they are proceeding with expensive projects that do not include the import of seawater. The current projects are not in harmony with the import of seawater. Question 2 : If the Panel of the Independent Reviewers concludes that the importation of seawater is feasible and very profitable but not compatible with the “current course of action” – the dust suppression projects, etc. What is your plan regarding the “current course of action”– dust suppression projects, etc.? a) Are those projects going to be flooded with seawater? b) Are you going to stop those projects on time with minimal losses of money and time? c) c) Are you going to continue with dust suppression projects – mitigate exposed lakebed - despite the import of seawater that can fill up the Lake to the original water level and eliminate the need for dust suppression projects?	Comment noted.

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99-74	8/20/22	Letter via email	Nikola Lakic	Regarding the fourth reference above - the North Lake Pilot Project: Question 3: What is the purpose of the expensive North Lake Pilot Project and what do supporters (perpetrators) of such an expensive experiment expect to learn more than everybody already knows and is obvious?	Comment noted. This project would create shallow- and deep-water fish and bird habitat.
99-75	8/20/22	Letter via email	Nikola Lakic	Regarding the fifth reference above – the Desert Shores Channel Restoration Project: This is a typical nonsensical project, as are the rest of them, with the intention to refill the five southernmost boat channels in the Desert Shores Marina. One does not need to have extensive expertise (education) in order to realize how nonsensical this concept is. They want to connect the Desert Shores Marina with North Lake with a canal presumably to revive the Desert Shores Marina. Just think for a moment. Just to balance the evaporation of the North Lake it needs about 50,000 acre-feet of water per year. According to this amateurish concept, they intend to use water from depleting groundwater wells, but they are not sure about it yet. That concept does not provide water circulation either. Even if there were 50,000 acre-feet of water, without circulation water would be stagnated and the North Lake and Marina would soon be infested with algae.	Comment noted.
99-76	8/20/22	Letter via email	Nikola Lakic	Also, in the Report is written the following: “ <i>The project would construct a berm across the former boat channel connection to the Salton Sea. Water would then be pumped from wells into the channels contained by the berm at a rate sufficient to refill the channels</i> ”. That is “speculative” and “wishful” thinking. People need to understand the following: To refill the five southernmost boat channels to an appropriate water level - to function as it was originally designed - is about -225'. The North Lake needs to be refilled to the same elevation. Relatively soon, the “Brine Lake” (the central part of the Salton Sea) will shrink (drop) to an elevation of about -265'. That means that, in a relatively shallow Lake, will be a substantial surface of playa between the berm (levee) and the “Brine Lake” with not enough water to mitigate the substantially exposed lakebed. That is an invitation to an ecological disaster (see Question 2 above). Such non-sensical designs are the result of the situation when Biologists, Chemists, Administrators, Environmental Scientists, or amateur enthusiasts try to “play” Architects.	Comment noted.
99-77	8/20/22	Letter via email	Nikola Lakic	Also, in the Report is written the following: “ <i>Work on the Desert Shores Project is expected to start in 2022 upon completion of the environmental compliance and permitting process.</i> ”	Comment noted. This statement is not in the Draft EA, but the estimated date for this proposed project has moved.
99-78	8/20/22	Letter via email	Nikola Lakic	I respectfully urge Secretary Vade Crowfoot, CNRA, Governor Gavin Newsom, and Jared Blumenfeld, EPA, to stop this one and all nonsensical projects and to wait for the report from the Panel of independent reviewers. NOTE: (ADDENDUM – August 2022) Unfortunately, because of a fundamental breach of the Panel's “independent” status by collaborating with the opposing side, by their admission on tape, at the meeting on July 20, 2022, and refusal (in writing) to review the only proposal that provides the solution for the restoration of the Salton Sea, the Panel's evaluation results cannot be considered valid moving forward.	Comment noted.
99-79	8/20/22	Letter via email	Nikola Lakic	Now that I have pointed out the grave results if the “Desert Shores Channel Restoration Project” continues, I respectfully urge everyone involved in this case to check and compare - how my proposal deals with the same area (around Desert Shore). Here is the link to the summary of my proposal for the restoration of the Salton Sea. http://www.geothermalworldwide.com/images/ImportingSeawater-1.pdf . Please see relevant Slides 22 (Figure 8); Slide 24 (Figure 10); Slide 25 (Figure 11). (Facility for generation of surfing waves that would put Desert Shore on the Word map.)	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-80	8/20/22	Letter via email	Nikola Lakic	<u>About patent infringement:</u> 1. It is important to mention that Supervisor, Manuel V. Perez, to whom I made a presentation in his office on several occasions in 2014-2017. Each time he must leave after 10 minutes. Obviously, he liked the first part of my presentation (concept) of dividing the Salton Sea into three parts but did not completely understand its function. In the SSA News Release in November 2018, he talks about North Lake and suggests Imperial County do the same at the south end. He talks about the development of exclusive real estate around the Lake (soon to be a cesspool) and takes credit for it. He talks about forming the Enhanced Infrastructure Financing District (EIFD) – which is a good tool for the right reason. He does not understand how big a scandal it would be if they continued with Perimeter/Brine Lake without consulting with me for the implementation of my proposal which would have a completely different outcome. Here is a link to that document: SSA New(s) Release - Riverside County Launches Salton Sea Enhanced Infrastructure Financing District - Copy.pdf	Comment noted.
99-81	8/20/22	Letter via email	Nikola Lakic	2. Although “THEY” are talking about North Lake, they are avoiding showing a complete illustration with a dike (road) connecting Hwy 86 and Hwy 111 because it is almost identical to the illustration in my proposal. They intend to add that later. I am including a photo that I took from my screen during some of their presentations intentionally showing just a part of North Lake boundaries. The exception is that “THEY” extended the dike on the western side to include Desert Shore as “Desert Shore Channel Restoration Project”, which is painful to watch. They are “butchering” my design. (See regarding “fifth reference” on pages 22 and 24).	Comment noted.
99-82	8/20/22	Letter via email	Nikola Lakic	3. Using an identical corridor for a pipeline from San Felipe to the Salton Sea that I have proposed in 2018 in my patented proposal for the restoration of the Salton Sea which is illustrated in my patent and at the same time excludes me and my proposal from further participation is an attempt to steal.	Comment noted.
99-83	8/20/22	Letter via email	Nikola Lakic	4. Moving from the “Perimeter/Brine Lake” concept, which is a nonsensical project, smoothly (slowly but surely) to the “North Lake concept” which is an essential part of my patented proposal for the restoration of the Salton Sea is also stealing in process.	Comment noted.
99-84	8/20/22	Letter via email	Nikola Lakic	5. Saying the following “In the final report the Panel does recommend that there will be investments in emerging technologies and ideas that emerged from this process” after my proposal is excluded from further evaluation because of the supposed involvement of new emerging technology, is also an attempt to steal.	Comment noted.
99-85	8/20/22	Letter via email	Nikola Lakic	6. Because there is strong evidence of manipulative tactics and conducts by “THEM”, and because of the serious possibility that in the near future, when I am supposedly out of the picture, “THEY” would make the radical change in their design as part of their evolution, to finish the steal. Such practice cannot be tolerated. The State could and should stop such illegal practices.	Comment noted.
99-86	8/20/22	Letter via email	Nikola Lakic	NOTE: For those who are not familiar with the concept of the “Perimeter/Brine Lake”. The “Perimeter/Brine Lake” is a single snake-like “U”- shaped lake consisting of the south part, west part, north part, and east part. The perimeter wall formed around the periphery (perimeter) of the Salton Sea supposedly would funnel New River, Alamo River, Whitewater River, and several Dry Washes around into the central part of the Salton Sea which is the Brine Lake. Brine Lake would be smaller, saltier, smellier, and more polluted every year, and sooner or later would become a cesspool. That is a ridiculous concept that I am arguing against for a long time. Here is the link: Microsoft Word - SS Benchmark 7_5-11-16 (saltonseaaauthority.org) or http://saltonseaaauthority.org/wp-content/uploads/2019/11/SSA-Benchmark-7-forFFAP.pdf). The illustrations on pages 48 and 55 show the “Perimeter Lake” as a single “snake-like shape” Lake.	Comment noted. The alternatives considered in the EA have their own figures.
99-87	8/20/22	Letter via email	Nikola Lakic	<u>A few words about my work:</u> My proposal for the restoration of the Salton Sea involves architectural design which incorporates several breakthrough technologies in the energy industry which I have invented and modified to incorporate local conditions of the Salton Sea area with the final product – the long-term solution for the restoration of the Salton Sea. It might be considered a project of the century costing only about \$15 billion and generating at least \$500,000,000 revenue per year just from energy – not including tourism.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-88	8/20/22	Letter via email	Nikola Lakic	<p>This time, I will just summarize the subjects of my breakthrough methodologies:</p> <p>1. I am the inventor of the new system for harnessing geothermal energy (a completely closed-loop system) which is not limited to geothermal reservoirs.</p> <p>2. I am also the inventor of the new system for drilling deeper and wider wellbores.</p> <p>3. I am also the inventor of the new system for harnessing solar energy (thermooptical solar system) having the “power unite” with pistons, which is at least several times more efficient than Photo Voltaic (PV) systems.</p> <p>4. I am also the inventor of the new system of cross-country pipelines for importing seawater or other fluids, having the “in-line pump” as segments of the pipeline for uphill routes, and having the “in-line generator” as segments of the pipeline for downhill routes with the “Delta Power Plant” at the last section.</p>	Comment noted.
99-89	8/20/22	Letter via email	Nikola Lakic	<p>5. I am also the inventor of the new system for using the pipeline as a foundation for solar panels which eliminates expenses for purchasing or leasing huge sections of land, which is an expensive requirement for conventional solar facilities on an industrial scale. My system decentralizes the conventional centralized systems.</p> <p>6. I am also the inventor of the new system for the desalinization of salty water using solar and/or geothermal energy to generate electricity and having potable water as a free byproduct, and concentrated brine to be used to produce Lithium.</p> <p>7. After the accident offshore of Louisiana in the Gulf of Mexico on April 20, 2010, and a failure of the "Blow Out Preventer" (BOP) in the Macondo well, it became a challenge how to stop uncontrollable bursts of crude oil in the Gulf of Mexico and prevent disasters of epic proportions. Out of over 3,000 proposals and many universities and laboratories participating, my proposal for controlling dysfunctional “Blow out Preventer” was used to stop uncontrollable bursts of crude oil. By July 15, 2010, the Macondo well was successfully sealed, if only temporarily, for the first time in 87 days. That was only 34 days after my submission. Implementation of the control valve on top of the dysfunctional BOP was televised on CNN.</p> <p>8. I graduated from the School of Architecture, University Cyril and Methodius, Skopje, North Macedonia, in 1982, and immigrated to the United States in 1983, as a student at the Frank Lloyd Wright School of Architecture, Taliesin West in Arizona, and Taliesin East in Wisconsin. The University Cyril and Methodius – School of Architecture - consists of nine semesters, around 38 exams, plus graduate work which takes an additional 5-6 months. I am proud to say that my graduate work scored 10 out of 10, which is rarely given.</p>	Comment noted.
99-90	8/20/22	Letter via email	Nikola Lakic	<p>My mission is global – which is licensing technologies worldwide to capable companies/contractors with means. The Salton Sea project is a small part of it but an important part. It is imperative to save the Salton Sea and our environment despite unreasonable opposition. I am providing a solution and the “know-how” to the desperate situation.</p>	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-91	8/20/22	Letter via email	Nikola Lakic	<p>Please watch at least the video of my presentation in front of members of the CEC. It is about 60 minutes. I am grateful for such an opportunity from the CEC although material is substantial and I needed more than 60 minutes. Here is the link: https://energy.zoom.us/rec/share/d4tAFmZFYEqg4_VQzKgnbEbbjsTGo8xeJX9KRkIp4uLlvOr7dCOz-9zrcMW-tW.JZXVajNyKAb3E9Of.</p> <p>Also, I am including links, and a summary of my proposal for the restoration of the Salton Sea, divided into five segments for easier understanding. Each of the segments (phases) is essential for the final product – a self-sustained Salton Sea.</p> <p>–(About Importing Seawater – Segment - I) http://www.geothermalworldwide.com/images/ImportingSeawater-1.pdf</p> <p>–(About Harnessing Hydropower – Segment - II) 6+(II) Harnessing Hydro Power - May, 2019 - Copy - Copy.pdf</p> <p>–(About Harnessing Solar Energy – Segment - III) 6+(III) Harnessing Solar Energy - Addendum - July 1, 2022 - - Copy - Copy.pdf</p> <p>–(About Harnessing Geothermal Energy – Segment - IV) (in the GWC 2020 papers it is defined as Segment - II) http://www.geothermalworldwide.com/images/HarnessingGeothermalEnergy-4.pdf</p> <p>–(About Drilling Deeper and Wider Wellbores – Segment - V) (in the GWC 2020 papers it is defined as Segment - III) http://www.geothermalworldwide.com/images/DrillingDeeperWellbores-5.pdf</p> <p>The value of my work is its simplicity and its necessity. An average high school student could understand it in a relatively short time if read thoroughly. My work is patented with several “continuation-in-part” applications still pending.</p>	Comment noted. The Corps is unable to consider a video, or any views expressed in a video as constituting submittal of a comment for the purposes of the Corps public notice period.
99-92	8/20/22	Letter via email	Nikola Lakic	<p>My suggestion about the next step: The restoration of the Salton Sea is of enormous importance not just for the local population but for the environment and the state of California. We lost a lot of time and money without a valid reason. Because of the gross failure of the current Panel of independent reviewers, it would be wise to extend the evaluation for another 6-8 months for a proper evaluation of my proposal to ensure a proper direction forward.</p> <p>I challenge any expert in the USA and Worldwide to find anything wrong with my proposal in its concept and technologies involved with respect to feasibility and its function.</p> <p>Feasibility definition: 1. <i>the possibility that can be made, done, or achieved, or is reasonable: the state or degree of being easily or conveniently done: This level of description is sufficient for an engineer to consider initial design feasibility.</i></p>	Comment noted.
99-93	8/20/22	Letter via email	Nikola Lakic	<p>Many companies that produce conventional turbines can produce my design of the “In-Line Pump” and “In-Line Generator” using the same material and technologies.</p> <p>Many companies that produce conventional steam engines can produce my design of the “power unit” using a piston system using the same material and technologies.</p> <p>Many companies that produce air-conditioning units and heat exchangers can produce my design of “thermos - Optical Solar System” using the same or similar material and technologies.</p> <p>Many companies that produce conventional drilling equipment can produce my design of motorized drill heads and heat exchangers using the same or similar material and technologies.</p> <p>All components of different technologies in my proposal for the restoration of the Salton Sea can be produced, and several prototypes tested, in around 5-6 months let’s say a year. That is not a difficult task.</p> <p>Even if conventional turbines and/or PV solar panels are used in my concept it will still generate positive revenue but not as much as it would be by implementing complete my proposal.</p>	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-94	8/20/22	Letter via email	Nikola Lakic	<p>I am confident in the validity of my proposal for the restoration of the Salton Sea that I would encourage the State of California to issue a contest on an international scale so that big known companies with experience in large projects such as AECOM, FLUOR, ORMAT, TENGDI MACHINERY, EQT, FUJI, GENERAL ELECTRIC, SIEMENS, ABB, MITSUBISHI, etc., to mention just a few, can compete with their proposal (concept). A few million dollars award for the several 1st -3rd place to stimulate a process and participation would be appropriate. That would be a much better way of spending a few million dollars that paying for the current Panel of “independent” reviewers for their lousy service.</p> <p>One option would be to contact some of the big capable companies just as contractors for the implementation of my proposal. That way, after multi-independent studies, the evaluation of my proposal could be completed, with a lesser chance of corruptive and manipulative inputs. Also, by doing so a potential contractor for implementation could be found.</p> <p>Symbolic participating fees should be included to prevent overcrowding the contest and to minimize the participation of amateurs. No pun intended, but this project requires certain expertise.</p>	Comment noted.
99-95	8/20/22	Letter via email	Nikola Lakic	<p>After providing an overview of the situation (see the second paragraph on the first page of this letter) the criteria for the contest should be very simple:</p> <ul style="list-style-type: none"> A. Solution must be viable and technically sound for the importation of seawater whether from the Sea of Cortez or the Pacific Ocean or both. B. Solution must be viable in stopping pollution of the Salton Sea. C. Solution must be viable in respecting the Quantification Settlement Agreement (QSA) because of limited inflow from the Colorado River. D. Solution must be viable in providing wildlife sanctuaries. E. Solution must be viable in reducing the salinity of the Salton Sea. F. Solution must be viable in providing conditions for tourism and other activities to benefit the local population, employment, and economy. G. Solution must be viable in harmonizing existing projects for the extraction of lithium from the geothermal brine and the restoration of the Salton Sea that include importation of seawater. H. Solution must be economically viable having a positive ratio of cost expense for the project and revenue generated from the project. If there are several proposals having similar but different parts or technologies, then, they should be evaluated by comparison on each difference including cost, feasibility, efficiency, and revenue generated. <p>In fairness, because of the gross failure of the current Panel, all previous participants including Tetra-Tech should be welcome to participate again, if they want, without participating fees.</p>	Comment noted.
99-96	8/20/22	Letter via email	Nikola Lakic	<p><u>A few clarifications about my proposal:</u> After 10 years of working on the restoration of the Salton Sea, and based on my expertise and experience, I can say with certainty that the only way forward to save and restore the Salton Sea is what I am proposing:</p> <ol style="list-style-type: none"> 1. To stop pollution by redirecting the main pollutants – New River and Alamo River – back to Mexico, (at the border before are polluted with pesticides and fertilizers) to refill Laguna Salada (dry Lake in Mexico), or optionally, redirect them directly to the Gulf of California (Sea of Cortez) and reestablish flow to the Gulf of California. 2. To divide the Salton Sea into three parts (North Lake, South Lake, and large Central Lake) and import seawater from the Gulf of California (San Felipe area) and with a second corridor from the Ocean (Long Beach area) into the Central Lake. In return, negotiate (get) a corridor with a service road for the importation of seawater. That way we will save \$50,000,000 per year that otherwise we would need to pay for 1,000,000 AFY of imported seawater. 3. Providing vertical circulation – using salty water from the bottom of the Lakes for the production of electricity, potable water, and concentrated brine as a byproduct that can be used to produce lithium - and importing seawater on the surface. 4. To establish huge wildlife sanctuaries at North Lake and South Lake; and 5. To harness geothermal and solar energy prevalent in the area. 	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-97	8/20/22	Letter via email	Nikola Lakic	By dividing the Salton Sea into three Lakes and redirecting the New River and Alamo River to Mexico, it would allow us to use less water from the Colorado River – just for farmlands and for supplying the North and South Lakes. That is in harmony with the Quantification Settlement Agreement (QSA) that pronounces reduction of water from the Colorado River because of drought (dry seasons). We would not need to worry about large Central Lake anymore because now we can import plenty of seawater from the Gulf of California and the Ocean. Also, having two corridors for importing seawater provides more salt that we need for production of lithium, and potable water for our and future generations.	Comment noted.
99-98	8/20/22	Letter via email	Nikola Lakic	<u>In Closing:</u> The Panel's gross breach of trust is obvious, because of compromising its independent statute (impartiality) during the process of reviewing proposals for the restoration of the Salton Sea. During the meeting on July 20, 2022, the Panel admitted collaboration with the Tetra-Tech that promotes, supports, and works on the current course of action which is the "Perimeter/Brine Lake" and related dust suppression project that leads to the destruction of the Salton Sea. By imposing manipulated criteria in collaboration with the Tetra-Tech the Panel made a fundamental irreparable mistake.	Comment noted.
99-99	8/20/22	Letter via email	Nikola Lakic	There is strong evidence that two scams regarding the Salton Sea are in process. A) Well organized group of people with THEIR "tentacles" in several agencies are in process of getting rid of the Salton Sea for their pitiful self-interest in disguise of trying to help the Salton Sea. That is obvious. What is not obvious is the second scam B) The same group with an awkward twist is in process of stealing several components of my patented comprehensive plan (concept) for the restoration of the Salton Sea. Because of a fundamental breach of the Panel's "independent" status by collaborating with the main participant, by their admission on tape, and refusal (in writing) to review the only proposal that provide the solution for the restoration of the Salton Sea, the Panel's evaluation results cannot be considered valid moving forward. Such a fundamental mistake makes the restoration of the Salton Sea in jeopardy. Such conduct is highly irresponsible that disqualifies the Panel from the further evaluation process and Tetra-Tech from further participation as the State's consultant firm (advisor).	Comment noted.
99-100	8/20/22	Letter via email	Nikola Lakic	Although "THEIR" focus is on supposedly legal protocol and getting permits and funding, they are missing, intentionally or unintentionally, a bigger picture. They are missing the purpose of their task, which was/is to save and restore the Salton Sea. Because of the enormous size of the project for the restoration of the Salton Sea and its importance, not just for the local population, but for California, and resistance to climate change worldwide, and the tremendous benefits that my proposal will bring to nearby communities and the State of California, the new review is necessary. Because "THEY" and now the Panel openly refuse to even look at my proposal for the restoration of the Salton Sea, because of strange, imposed criteria, I respectfully urge those officials who have good intentions towards saving and restoring the Salton Sea, and who are working for the State - EPA, DOE, CNRS, etc., and Corps which represent Federal Government to start participating in saving and restoring the Salton Sea and our environment. Being passive and silent in this critical time is dangerous and counterproductive.	Comment noted.
99-101	8/20/22	Letter via email	Nikola Lakic	I respectfully urge Governor Gavin Newsom, to use his executive power and dismiss the Panel's results and initiate speedy (expeditiously) evaluation of my proposal through a different set of reviewers with the necessary expertise on the subject (architects (planning), civil and mechanical engineers) who would not succumb to the pressure of either side.	Comment noted.
99-102	8/20/22	Letter via email	Nikola Lakic	An option for evaluation of my proposal is to contact potential contractors for the implementation of the project such as AECOM, FLUOR, ORMAT, TENGDI MACHINERY, EQT, FUJI, GENERAL ELECTRIC, SIEMENS, ABB, MITSUBISHI, etc., and request their cost estimate for the project. That way potential contractors can compete for the job and at the same time evaluate the feasibility of my proposal and the technology involved. I believe that by including multinational companies would minimize possible corrupted conduct and interference with evaluation by "THEM".	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
99-103	8/20/22	Letter via email	Nikola Lakic	My proposal is a comprehensive architectural plan that needs my participation in all aspects of the process. I am willing to help. Because of the unhealthy situation and manipulative conducts by local leadership radical changes need to be done before moving forward with the restoration of the Salton Sea.	Comment noted.
99-104	8/20/22	Letter via email	Nikola Lakic	I would like to emphasize the importance of this project at this critical time. There are really two options for the State to choose about the fate of the Salton Sea with two completely different outcomes: Option I – To proceed with the current project already in motion a “Smaller, Sustainable Lake” – “10-year plan” – “Perimeter Lake” - The projects that will be constantly asking the State and Federal Governments for help (for more money) for fixing never-ending problems - and at the end losing the Lake with liabilities exceeding \$70 billion (environmental disaster – toxic dust storms, health issues, and economic fold). (NOTE: In the process would benefit a few “friendly” companies on the expenses of the environment and communities); and Option II – To redirect allocated money and efforts toward implementation of the long-term solution (my proposal) which would restore the Salton Sea to the water level of the 1950s and 60s; provide the condition, for tourism, wildlife sanctuary, clean environment, and generate revenue in 100s Billion Dollars in several decades and would continue so in future costing only about \$15,000,000,000. (NOTE: A few companies that would benefit from Option I, would benefit even more with Option II, – they just do not understand it yet).	Comment noted.
99-105	8/20/22	Letter via email	Nikola Lakic	Sorry for repetition but it is important - I would like to emphasize again that the longer non-sensical projects continue (being funded) which unequivocally leads to the destruction of the Salton Sea, will prolong the suffering of the nearby population and economy at large, and that every year of delay in the implementation of my proposal - means - losing at least \$500,000,000 in revenue just from clean energy, not to mention the environment, loss of tourism, economic fall, etc.	Comment noted.
100-1	8/20/22	Email	Tom Sephton	The U.S. Army Corps of Engineers Draft Environmental Assessment includes a two paragraph description and one map of the 10 Year Plan Alternative 1, Maximum Lake Edge. While I am supportive of a plan that extends lake edge to all shoreline communities, which this claims to do, it does not explain how that lake edge will be created or maintained. It does state that water sources would include the New River, Alamo River, and Whitewater River, which are known to be polluted. No water treatment is mentioned. No blending with Salton Sea water for salinity management and contaminant dilution is mentioned. No discussion of diversion of sun concentrated polluted water to a brine sink or anything else is mentioned.	Detailed project designs will be guided by water availability, water quality, and salinity targets, with specifics identified at the time the projects are ready to move forward. A new Section 3.17 and Table 3-7 was added to the EA to address project water demands, water availability, and water agreements. All projects will be designed to be self-contained, with need for minimal maintenance.
100-2	8/20/22	Email	Tom Sephton	It appears that Alternative 1 Maximum Lake Edge is the Tetra Tech, Inc. and Salton Sea Authority's Updated Perimeter Lake proposal with an alternate name and repackaged as part of the 10 Year Plan NEPA process (see Figures 1 and 2. This appears to be a crafty scheme to enable the Updated Perimeter Lake proposal to bypass the whole Long-Range Planning review process. If approved in NEPA, any Long-Range Planning process may be moot.	Refer to comment response 55-3.
100-3	8/20/22	Email	Tom Sephton	It's well known that the Salton Sea Authority has been pushing to have the updated Tetra Tech Perimeter Lake concept be selected as the chosen long range plan for the Salton Sea. There is also an institutional history of support for the Perimeter Lake in the State SSMP. This and the reality that Tetra Tech has an outsized influence on the selection process and will likely benefit to the tune of hundreds of millions if their Perimeter Lake concept is chosen. This gives reason for concern that the Long Range Plan selection process may be bypassed by selection of Alternative 1.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
100-4	8/20/22	Email	Tom Sephton	<p>The Tetra Tech Updated Perimeter Lake concept has serious flaws including:</p> <ol style="list-style-type: none"> 1. High cost to build roughly 60 miles of dam around the perimeter of the Salton Sea and maintain it in perpetuity. 2. High risk if major sections of the dam fail due to earthquake, flooding, or other failure. Nobody from the Federal Government has evaluated making this kind of dam earthquake safe. Brawley Fault, Elmore Faults, others will be crossed multiple times (see Figure 3). Widespread liquefaction is likely. It's unlikely to be feasible to engineer the Perimeter Lake to be earthquake safe with earthen dams. 3. Poor water quality from New and Alamo River inflows that will dominate the mix of water in the Perimeter Lake / canal along the shoreline absent ocean water availability. Project is funneling essentially toxic and dangerous water to communities. 4. Overly optimistic inflow projections in the current diagram showing the residual body of the Salton Sea inside the perimeter. The original proposal was vastly different, showing two small brine ponds at the deepest parts of the Sea. The Salton Sea Authority Board asked Tetra Tech to hide that likely reality in all future drawings. Inflow projections are not sound. There is no certainty of water supply. In crisis IID water rights will be heavily challenged. If Tetra Tech assumes that IID will get their full 3 MAFY allotment, they are delusional. 5. No clearly defined and workable plan to control dust emission from the exposed playa between the Perimeter Lake / canal and the residual Sea. No plan and seriously misleading diagram on the amount of playa exposed. 	<p>Refer to comment response 55-52 regarding berm construction.</p> <p>Refer to Appendix C (was Appendix F in Draft EA), which has been revised in the Final EA to include additional modeling results and to present the water demand by individual project component and alternative.</p> <p>The requirement for a dust control and management plan to be prepared and implemented has been added to Section 5.4 (Air Resources, Effects Analysis) of the Final EA.</p>
100-5	8/20/22	Email	Tom Sephton	<ol style="list-style-type: none"> 6. Misleading summary statement about the salinity of the residual Sea. Only reasonable assumption is that it can support halophilic algae and bacteria and viruses. It should be colored red on the diagram. Can only assume extraordinarily high salinity. 7. Very poor greenhouse gas prognosis for both residual Sea and exposed playa. Every element of the plan will be highly emissive: a. SCH excavated Pleistocene sediments and exposed them to wetness and to atmosphere thus taking carbon sequestered for thousands of years and enabled it to become emissive. Perimeter Lake will do the same. There is an essentially infinite supply of carbon going down for miles underground, dig it up, rewet it, and microorganisms will go to town on that carbonaceous sediment. Maintenance on dam will also be constant and will release more carbon. b. Exposed playa without disturbance will emit, see Ross Report c. Repeatedly applying water an in Perimeter Lake dust strategy will cause higher greenhouse gas emissions than undisturbed playa. Wind events will move the water in the brine sink onto the playa due to bacteria thriving in the water on new food supply. Major pulses of emissions will occur. d. Water in Perimeter Lake will be full of carbon, e. Brine sink in residual Sea will sustain only bacteria that will respire methane. 8. Shallow Habitat Projects will use dredged material for levies. Also the Perimeter Lake dam will use dredged material bringing up carbon loaded sediments. 9. Small bodies of water rapidly cycle carbon compared to a large body of water like Salton Sea. Large bodies of water cycle carbon in a more complex and beneficial way. 10. It's not clear how GHG criteria will be quantified to compare one proposal to another without the needed research. We do not have time in the 6 months left before the SSMP recommendation report to do the research. Cost is partly lab work for carbon sequestration analysis of core samples, but not very high, however we are out of time. 	<p>An analysis of landscape greenhouse emissions from the lake surface and from exposed playa is presented in the Long-Range Plan, Appendix F (https://saltonsea.ca.gov/wp-content/uploads/2024/03/LRP-Appendix-F-Greenhouse-Gas-Emissions.pdf). This analysis is based on available published data from water bodies, including saline water bodies. Sediment carbon is expected to be oxidized upon drying but there is no science to support the claim that "There is an essentially infinite supply of carbon going down for miles underground, dig it up, rewet it, and microorganisms will go to town on that carbonaceous sediment."</p>
100-6	8/20/22	Email	Tom Sephton	<p>It should also be noted, that under Alternative 1, the Desert Shores Channels Restoration Project will be excluded (page 215). Perhaps the project at Desert Shores is considered to be pointless if there is a Perimeter Lake right outside it, but this will not be well received by the residents of the Desert Shores community.</p>	<p>The Desert Shores Project is included in the Proposed Action. The EA provides a range of alternatives, not all of which include all projects identified.</p>
100-7	8/20/22	Email	Tom Sephton	<p>As a Salton Sea area resident I oppose Alternative 1 for the reasons stated and support Alternative 2 as a reasonable balance between constructed habitat and enhancement of existing emergent wetlands as a way to recover habitat until a long range plan can be decided and implemented.</p>	<p>Comment noted.</p>
101-1	7/25/22	Email	L. Garcia	<p>Excerpt from The Desert Review provided. No comments provided.</p>	<p>No comments provided. No response needed.</p>

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
102-1	8/1/22	Email	Rob Zimmer, Spectrum	Please visit https://saltonseawatch.com for ideas about the Salton Sea from a local perspective.	Comment noted. The Corps is unable to consider a video, or any views expressed in a video as constituting submittal of a comment for the purposes of the Corps public notice period. The commenter was encouraged to submit written comments for consideration by the Corps' during the preparation of a Final EA.
103-1	8/2/22	Email	Kenneth Davlin, Oscar Larson & Associates Consulting Engineering	<p>We represent a company which intends to drill for deep brines on Sec 1, T11S, R10E in Imperial County. The parcel is located on the north westerly portion of Salton Sea southerly of Salton City. We intend to drill into the aquifer to gain freshwater for ongoing operations, since the closest water district only provides fresh water for construction, but does not provide water for operations. If we locate a suitable reservoir containing lithium, we will need to construct cooling towers or cooling systems, since the brine is quite hot, and needs to be substantially cooled for the chemical production process to work properly.</p> <p>One option might be to draw water from the Salton Sea (SS), upon which this property fronts, pump the SS water thru the process and then return it to the SS.</p> <p>My question is whether the use of SS water for that purpose is subject to a permit approval with conditions, or whether it is not permitted by some ruling or statute?</p>	Comment noted. The commenter is describing a project that is not part of the project covered in the SSMP 10-Year Plan or associated EA. No further response is required.
104-1	8/13/22	Email	Stephanie Martin	My name is Stephanie C. Martin White, mother, wife, daughter, granddaughter, sister, niece, cousin to the Scotch-Irish Martin Clan of Southern California. I have lived in the Coachella Valley for the past decade or so, from the City of La Quinta, to the City of Coachella, and presently reporting from beautiful Desert Hot Springs.	Comment noted.
104-2	8/13/22	Email	Stephanie Martin	I am writing this letter to comment on both the Draft Environmental Assessment (EA), as well as the proposed Letter of Permission procedures for the State of California's Salton Sea Management Program (SSMP) 10 Year Plan, as well as an additional comment regarding the "Public Comment on Policy Measures to better serve needs of Tribal Nations and disadvantaged and underserved communities" notice found at https://www.federalregister.gov/documents/2022/06/03/2022-11881/notice-of-virtualpublic-and-tribal-meetings-regarding-the-modernization-of-army-civil-works-policy (My understanding is that comments were due August 5th, but I still feel like my comments are relevant to this document regardless).	Comment noted.
104-3	8/13/22	Email	Stephanie Martin	I am specifically writing today regarding some concerns I have not only as an American citizen, but also as a believer in protecting the Earth as the planet. In addition to that, my region of the world is of special interest to me, in all ways including natural prosperity of a healthy environment, financial prosperity with good business, and social prosperity with a high quality of life standard enjoyed by all. When one or more of these areas are struggling, it is obvious because it is rife with tragedy. At the Salton Sea, most of these factors of what brings success to individuals and communities as a whole are lacking at best and at worst do not exist in many areas in Imperial County and Riverside County surrounding the Salton Sea where agriculture is king.	Comment noted.
104-4	8/13/22	Email	Stephanie Martin	I am also a consultant by profession and academic by heart and have dedicated my efforts to studying this region as holistically as possible looking for a resolution that truly makes me feel at home in this new region I intend to settle for generations to come. I have roots in Oklahoma, and other parts of Riverside County, I have cousins in Illinois, Wisconsin, Colorado, Hawaii, Tennessee, Kentucky, and want to feel like I, myself, this branch of the family, has found our place, our home. I have Scotch Irish (Scottish), English, and Indigenous North American roots on my father's side and so the violent history between the settlers of places like Tennessee, and the Native Americans in that area is a story that is very familiar to me. The story is even more familiar to all Tribal nations in every region of North America, and California is no exception, perhaps being the most complex of all being settled first by the Spanish even before tribal nations further east and north were settled by the English and Scotch.	Comment noted.

Comment Number	Date	Submittal method	Name/Affiliation	Comment	Response
104-5	8/13/22	Email	Stephanie Martin	The tribes in this area were allotted land as the trains were allotted land, and one could say this was the second colonization point by the European other- a much shorter "trail of tears" as they were confined rather than removed. And the writing is on the wall to again, colonize the area a third time during the catalyst of the lithium white gold rush as these proposed letters of procedures to cut red tape and drill into our primordial waters, flimsy draft environmental assessment that doesn't include the concerns of the geothermal drilling that the letter of procedures looks to be aiding toward their doing whatever they please down there, and the ill timed and rushed but historically unprecedented "modernization" of tribal initiatives from the U.S. Army Corps of Engineers who, it is unclear whether or not they have the best interests of the Torres Martinez tribe and surrounding Tribal Communities as priority or whether or not this is more of a way to access their lands to drill for lithium. To wrap all these items together: the SSMP 10 year plan as the Environmental Assessment, the Proposed Letter of Procedure Permissions about the changing the rules about who can drill where and what and how deeply under the guise of restoring the Salton Sea, and the tribal rules changing under the guise of needing to help tribes in the Salton Sea region, without specifically addressing the overlapping concerns about the lithium plants, geothermal brine drilling and dumping, is my grave concern and complaint.	Comment noted.
104-6	8/13/22	Email	Stephanie Martin	That being said, I am gravely concerned about the lack of planning for and attention paid to the existing Lithium plants and drilling procedures as it concerns to extracting from our ancient waters, and in anticipation of more lithium plants and drilling wells dotting the beautiful and sensitive habitat of the Coachella Valley Desert, if these permissions are allowed, will encroach on the geothermal lake bed my land sits upon which would be devastating to me personally. This is also why I am a BLM and LGBTQA? ally: if discrimination could happen to you, it could happen to me. I do not want the lithium to take over the Salton Sea Niland a.k.a. the "Known Geothermal Resource Area" region, possibly wiping out communities, including the globally essential agricultural industry, change the tribal way of life, change the landscape drastically, and ultimately encroach wherever ancient primordial geothermal lakebeds are found; rinsing and repeating with their permits and all the rights to do so. If it happens to this geothermal lakebed, it could happen to any ancient geothermal lakebed, such as the geothermal "Seven Sisters" lakebed in Desert Hot Springs. Please consider these concerns as my understanding is that the lithium companies will most certainly take advantage of any changes of the rules at the policy level concerning water, regardless of whether or not they were granted with the restoration of the Salton Sea in mind. I am also concerned that the Tribes will not benefit from the policies concerning them and their land if they are suddenly subject to change at this time.	Comment noted. Lithium plants are not part of the SSMP 10-Year Plan and therefore were not analyzed in the EA.
104-7	8/13/22	Email	Stephanie Martin	What We the people need is public clarification and trusted knowledge from the U.S. Army Corps of Engineers about the Lithium Extraction Process in particular. Specifically the effect of the environment short and long term, the waters and landscape that is subject to drilling, and how specifically new permits would affect geothermal companies. It is of national security to include this aspect, this new, rare commodity, in all reports that includes the geothermal plants and region in the footprint of any proposed plans for Salton Sea restoration for example, or else this report appears very incomplete. How would an approval of a plan with a footprint in the known geothermal area specifically benefit the Lithium companies? If the geothermal area is "out of the scope of this report", then I think it is obvious that it would require a report of its own- from the U.S. Corps of Engineers- prior to any final policy and rule changes at such a high level. The Lithium Valley Commission Report is due on October 1, 2022. I think it would be most wise to include a Geothermal Drilling environmental assessment to be included in these articles at this timeframe and for this environmental assessment to be independent of the restoration of the Salton Sea plans. It just doesn't make sense to "wrap it all up into one" unless there are no plans to restore the Salton Sea, and this has all been a guise to permit unprecedented geothermal drilling and dumping to happen throughout the region. The geothermal companies and the lithium valley commission have given the public the go around. They said "no effect" on the environment and that is not enough information to go on. That being said, please, again, consider including a report on the Army Corps of Engineers independent assessment of geothermal lithium mining and brining, the process, effect on the environment, and rate of extraction that would be permitted under any new policies.	Comment noted. Lithium plants and geothermal projects are not part of the SSMP 10-Year Plan and therefore were not analyzed in the EA.