

# Memorandum

**To:** Salton Sea Authority Board of Directors  
**From:** G. Patrick O'Dowd, Executive Director /GM  
**Date:** September 21, 2023

**Re: Monitoring and Mitigation programs**

Since potential cuts on the Colorado River were first announced on June 14, 2022, the Salton Sea Authority has been actively pursuing an understanding of how such additional conservation measures might impact our communities. As the scope and timing of potential cuts become clearer and more imminent, it will be essential that the impacts from proposed actions to be taken are both well understood and responsibly mitigated. To that end, at the last meeting of the Authority, the role of the air resources boards was discussed in some detail, and inquiries were made as to how they work individually and collectively to monitor air quality in the region.

At a meeting of the Authority in September, 2021, [CNRA provided an overview](#) of efforts under way to develop a "Monitoring Implementation Plan" (MIP), a follow-up to the Ecosystem Monitoring and Assessment (MAP) plan developed back in 2013. The MIP acknowledges that "[m]onitoring of the Salton Sea ecosystem is critical for informed decision-making and the success of mitigation and habitat restoration projects aimed at reducing the amount of exposed playa, suppressing dust emissions from exposed playa, and creating habitat for key wildlife species." And while it is not intended as a comprehensive plan for assessing changes occurring at the Sea (indeed a separate "Species Conservation Habitat Monitoring and Adaptive Management Plan", published in 2015 exists for the SCH project), the [MIP, which was finalized in November, 2022](#) represents a foundational document which should be useful in both advising efforts to mitigate impacts from changes occurring at the Sea and informing the public of unmitigated risks.

Based on last month's Board discussion, staff reached out to CNRA and requested an update on the MIP implementation process, which contemplates that in its initial phase a "Salton Sea Science Program" would be funded and stood up to implement the MIP. We were advised by CNRA that such a request was untimely, and that they would better be in a position provide such presentation once the Annual report contemplated thereby is published, presumably after November. When asked about the status of the Science Program, we were advised that was not in the works, and that the plan would likely be implemented in a more diffuse manner. In addition, we were advised that six

(6) new positions were added to the California Department of Fish and Wildlife staff, and that that the bulk of that responsibility would be assumed by that group.

But because of the pressing need to ensure that risks associated with increased conservation are being properly assessed and responsibly mitigated, we felt a discussion today was critical. We understand that at Owens Lake, there exists 217 air quality monitoring stations situated throughout the basin, operated by Great Basin Unified Air Pollution Control District (Great Basin). Each day at 7am, readings are taken from each of the 217 monitors and, as conditions warrant, notifications go out to the local community both through texts and automated phone calls advising of potential adverse health risks. In addition, as part of the management plan, satellite images are taken of the basin every 5 days. Under its agreement, Los Angeles Department of Water and Power (LADWP), who is responsible for implementing air quality measures at Owens Lake, is obligated to maintain 75% coverage of exposed playa at the Lake, using "best available control methods", or BACM. If the satellite imagery indicates that LADWP is out of compliance with that requirement, Great Basin can levy significant fines on LADWP for each day they fail to comply. Since work began at Owens Lake, LADWP has spent \$2.5 Billion Dollars mitigating PM10. For context, it is also important to note that LADWP's principal responsibility is mitigation, and any habitat benefit from their efforts at Owens Lake are largely incidental.

Against that backdrop and with that context, we understand that the air quality monitoring at and around the Salton Sea is being conducted by a variety of players using different equipment and methodologies, and to our knowledge with enforcement limited to the landowners. And although the [State Water Board ordered](#) that California Natural Resources Agency meet certain acreage mitigation and restoration requirements, given the likely significant increase in exposures due to enhanced conservation, it can be anticipated that unmitigated playa exposures will likely continue to escalate. We believe time is of the essence. So, to advance this discussion around air quality monitoring and mitigation, we have invited Comite Civico del Valle to present to the board an overview of their work in this area, how they got started, what the program currently encompasses, and what the vision for the program is for the future. Hopefully this presentation and discussion will lead to a more fulsome public conversation on how the community should reasonably expect to be informed and engaged when it comes to the existing risk and risks being created by the accelerating changes taken place at the Sea, as well as how those risks are being mitigated.