ALIANZA
COACHELLA VALLEY

February 17, 2026

Bureau of Reclamation
Attn: BCOO-1000
P.O. Box 61470
Boulder City, NV 89006

Re: Formal comments of the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead – Draft Environmental Impact Statement.

Dear Acting Commissioner Scott J. Cameron and Deputy Commissioner David Palumbo,

Since time immemorial, the Salton Sea and its predecessor, Lake Cahuilla, have been integral components of the Colorado River ecosystem; over the past 1,300 years, water has filled the Salton Basin more often than not. These River flows sustained a vibrant ecology and indigenous cultures, principally the Torres Martinez Desert Cahuilla Indian Tribe. Since diversion of the River began over a century ago, and accelerating with conservation efforts over the last few decades, the ecosystem has crashed, and the Sea has become a toxic sump, poisoning local wildlife and humans alike.

The proposed River management guidelines are intended to further necessary water conservation efforts, which will inevitably lead to diminished flows and further degradation of the environment in the vicinity of the Sea, as demonstrated by the information described below and included herewith. Yet the EIS brazenly specifically excludes any analysis of impacts on the Sea's ecology or its human neighbors, and fails entirely to mention the Torres Martinez Desert Cahuilla Indian Tribe. Consequently, the EIS is fatally flawed.

We strenuously urge that the EIS be modified to fully evaluate the inevitable impacts of the management plan on the Sea and surrounding areas, including the Tribe; and that any future River management plan incorporate a robust monitoring program capable of detecting impacts on the environment and human neighbors and fully funded mitigation measures to fully mitigate ongoing and future impacts of River operations.

Failure to Address Tribal Impacts and Federal Trust Responsibilities

The Draft EIS's omission of the Torres Martinez Desert Cahuilla Indian Tribe is particularly concerning. The Tribe maintains profound cultural, spiritual, subsistence, and economic ties to the Salton Sea and its predecessor waters, and its lands lie directly adjacent to the receding shoreline. Reduced inflows exacerbate exposure to toxic dust, degrade cultural resources, and impair the Tribe's ability to exercise traditional practices. The Draft EIS neither acknowledges

these impacts nor documents any government-to-government consultation, contrary to federal trust responsibilities, Executive Order 13175, and Bureau of Reclamation policy. This failure alone renders the analysis incomplete and legally deficient.

Environmental Justice and the Creation of a Sacrifice Zone

Communities surrounding the Salton Sea—predominantly low-income communities and communities of color—have effectively become environmental sacrifice zones as Colorado River water is increasingly diverted to support distant metropolitan areas and agricultural districts in California and other Basin states. While these regions reap economic and quality-of-life benefits from conserved and redirected water supplies, Salton Sea communities disproportionately bear the environmental and health costs of reduced inflows, including toxic air pollution, ecosystem collapse, and economic disinvestment.

This outcome is a textbook example of disproportionate adverse impacts under Executive Order 12898 and recent federal environmental justice directives. The Draft EIS fails to analyze how proposed operational alternatives perpetuate or exacerbate these inequities, nor does it consider whether additional mitigation resources are necessary to offset harms imposed on frontline communities that do not benefit from the diverted water supplies.

Public Health Impacts

As the Salton Sea continues to recede, newly exposed playa emits fine particulate matter (PM10 and PM2.5) contaminated with pesticides, heavy metals, and other pollutants accumulated over decades of agricultural runoff (Appendix A, Refs. 1–4). Numerous studies and agency assessments have documented strong correlations between Sea-related dust exposure and elevated rates of asthma, emergency room visits, missed school days, and cardiovascular illness in Imperial and Riverside Counties (Appendix A, Refs. 5–8).

These counties already experience some of the highest pediatric asthma rates in California. Any River management strategy that further reduces inflows will foreseeably intensify these public health crises, increasing healthcare costs and placing additional burdens on county health departments, clinics, and school systems. The Draft EIS does not quantify or disclose these impacts, nor does it assess cumulative health effects in combination with climate change and existing pollution burdens.

Impacts to Infrastructure and Public Services

Increased dust deposition accelerates deterioration of roads, schools, water conveyance systems, and public facilities, driving up maintenance and replacement costs for jurisdictions with limited tax bases (Appendix A, Refs. 9–10). Health-related absenteeism undermines workforce stability for essential services, including healthcare, education, agriculture, and emergency response. These infrastructure and service impacts are foreseeable, measurable, and inseparable from reduced inflows to the Sea, yet they are not addressed in the Draft EIS.

Local and Regional Economic Impacts

The Draft EIS also fails to evaluate economic consequences for Salton Sea communities, including impacts on agricultural productivity, geothermal energy development, tourism potential, property values, and workforce retention. Deteriorating environmental and health conditions discourage investment and deepen cycles of poverty and outmigration. These economic harms are cumulative and long-term, and they contrast sharply with the economic benefits accrued by downstream and coastal regions receiving conserved Colorado River water.

Need for Mitigation, Monitoring, and Dedicated Resources

Given these realities, any post-2026 River management framework must include enforceable commitments to mitigate impacts on the Salton Sea and its communities. This includes, at minimum:

- Dedicated water or alternative dust-suppression measures sufficient to prevent additional playa exposure
- Long-term, fully funded air quality and public health monitoring programs
- Targeted investments in healthcare capacity, infrastructure resilience, and community economic development
- Formal inclusion of the Torres Martinez Desert Cahuilla Indian Tribe as a consulting sovereign with decision-making input
- Transparent accounting of who benefits from water diversions and who bears the resulting costs

Absent these measures, the Draft EIS effectively shifts the burdens of Basin-wide water management onto communities least able to absorb them, in direct conflict with NEPA, environmental justice mandates, and federal trust obligations.

Conclusion

By excluding the Salton Sea, its surrounding communities, and the Torres Martinez Desert Cahuilla Indian Tribe from meaningful analysis, the Draft EIS fails to take the required “hard look” at environmental, public health, and equity impacts. We urge the Bureau of Reclamation to revise the EIS to fully evaluate these impacts, incorporate cumulative and disproportionate impact analysis, and commit to enforceable, fully funded mitigation measures as a condition of any post-2026 operational guidelines.

Failure to do so will perpetuate preventable harm and render the EIS inadequate.

Sincerely,
Aydee Rodriguez
Environmental Justice Project Campaign Manager, Alianza Coachella Valley

California Air Resources Board. *Salton Sea Emissions and Air Quality Impacts.*
U.S. Geological Survey. *Salton Sea Dust Emissions and Playa Exposure Studies.*
California Natural Resources Agency. *Salton Sea Management Program: Phase I & II Reports.*

Frie, A. et al. *Contaminant Transport from Exposed Playa at the Salton Sea.*
Imperial County Public Health Department. *Asthma and Respiratory Disease Surveillance Data.*
California Department of Public Health. *Environmental Health Screening for Imperial and Riverside Counties.*
Ostro, B. et al. *Associations Between PM Exposure and Health Outcomes Near the Salton Sea.*
South Coast Air Quality Management District. *Regional PM10 Analysis.*
California Department of Transportation. *Infrastructure Impacts of Dust Deposition.*
University of California. *Economic and Infrastructure Risks Associated with Salton Sea Decline.*