



Framework of Assurance

A Strategy for Environmental Health and Public Accountability

Salton Sea Authority

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Why the Framework Matters

The Salton Sea is changing.

As Colorado River operations continue to evolve, so too will environmental and public health conditions at the Sea. Some of those changes are understood. Others remain uncertain. Yet no public entity is responsible for integrating the science, monitoring cumulative conditions, communicating emerging risks, preserving the institutional record, and coordinating a unified response.

That is the problem the Framework of Assurance is designed to solve.

The Framework is not a restoration project or a regulatory program. It creates no new environmental mandates and does not replace the authority of existing agencies. It is the institutional framework needed to coordinate the institutions that already exist.

Its purpose is to ensure that changing conditions are understood, communities remain informed, agency commitments remain visible, and future decisions are grounded in a complete institutional record.

The Framework is built around seven core functions:

- Define an acceptable environmental and public health condition.
- Integrate monitoring, scientific research, and community observations.
- Support hydrologic and exposure modeling.
- Guide adaptive management.
- Communicate timely, understandable information to affected communities.
- Coordinate participating agencies while preserving institutional continuity.
- Foster scientific partnerships and community-based research.

The technical standards for these functions should be developed collaboratively by responsible agencies, Tribal governments, universities, public health professionals, and technical experts during implementation. The Framework establishes the institutional structure within which that work can occur.

The Salton Sea Authority is uniquely positioned to serve as the coordinating entity because its mission is to connect, not replace, the agencies already responsible for the Sea.

The Authority seeks federal partnership to advance the Corps feasibility study while developing the Framework into an enduring system of coordinated environmental stewardship and public health protection.

The question is not whether the Salton Sea will continue to change. The question is whether public institutions are prepared to understand those changes, communicate them, and respond in a coordinated, transparent, and accountable manner.

The Framework of Assurance exists to ensure that they are.

Introduction

The Salton Sea is entering a period of rapid and continuing transition.

The system is changing, communities will be affected, and no integrated federal, state, local, tribal, scientific, and public health framework presently exists to understand those consequences as a whole.

For more than a century, the Sea has functioned as the receiving environment for agricultural drainage generated by the Colorado River delivery system. For most of that period, public institutions understood and managed the consequences of that arrangement primarily as hydrologic and ecological conditions within the Sea. Water levels fluctuated. Salinity increased. Biological conditions evolved. The relationship between those conditions and human exposure outside the shoreline received far less institutional attention.

That approach is no longer adequate.

Conservation programs, water transfers, shortage operations, climate pressures, and changing Colorado River management are altering the Sea's hydrology and accelerating shoreline recession. As conditions change, new exposure pathways emerge connecting physical conditions at the Sea to the communities that live around it.

Some risks are understood. Others are not.

The challenge facing the Salton Sea is therefore not simply environmental. It is one of governance.

The issue is not the absence of effort. It is the absence of an integrated system capable of understanding, communicating, managing, and independently verifying cumulative consequences and the effectiveness of the actions taken to address them over time.

No single entity is presently responsible for understanding the cumulative public health implications of changing conditions at the Sea. No entity is charged with integrating air quality, shoreline recession, biological transition, vector dynamics, hydrology, community observations, and public health indicators into a unified understanding of risk.

The absence of that capacity is the problem the **Framework of Assurance** ("the Framework") is designed to solve.

The Framework establishes the institutional infrastructure required to operate that system on a sustained and transparent basis.

Defining an Acceptable Condition

No controlling instrument governing the Salton Sea has defined the integrated condition the Sea and surrounding communities must achieve and sustain to be considered acceptable.

The acceptable condition is not necessarily a single elevation, salinity level, acreage target, or project configuration. It is an integrated performance envelope composed of measurable thresholds and ranges for the conditions necessary to protect human health, air quality, habitat function, water quality, Tribal resources, infrastructure, and surrounding communities.

State Water Board Order WR 2017-0134 is the principal compliance instrument governing implementation of Phase 1 of the Salton Sea Management Program. Its enforceable milestones are stated primarily in acres of habitat and dust-suppression construction. The Order recognizes the need for a monitoring framework to assess success, but it does not establish the corresponding salinity range, air-quality threshold, habitat-function standard, public health outcome, or other integrated condition by which success is to be determined.

Acreage became the measure of performance because acreage can be counted. The acceptable condition those acres are intended to produce was not defined.

The result is a governance structure capable of reporting substantial compliance while leaving the essential question unanswered: Are the Sea and surrounding communities within an acceptable condition?

Nine thousand acres of constructed habitat may be contractually delivered and publicly reported while failing to produce acceptable water quality, air quality, habitat function, or public health protection. Acreage is a means. Acceptable condition is the end. The two have not been connected through a governing performance standard.

This absence extends beyond the State Water Board Order. Environmental reviews prepared for individual actions have reached findings of no significant impact without first identifying the boundary between an acceptable and unacceptable cumulative condition at the Salton Sea.

Where the existing condition reflects decades of unresolved degradation, comparison against that condition measures only the increment caused by the next action. It does not determine whether the resulting condition is acceptable. The existing condition may serve as an analytical baseline. It cannot serve as the standard of acceptable performance.

Preserving Institutional Continuity

An acceptable condition must be capable of being defined, achieved, maintained, and periodically revalidated, not merely achieved. As the Colorado River system, the Salton Sea, and surrounding communities continue to change, the institutional record supporting management decisions must remain as durable as the physical monitoring itself.

Governmental commitments are made against the conditions that exist at the moment they are made. When implementation is deferred, conditions continue to change. The environmental consequences of that delay become incorporated into the analytical baseline, and future decisions are anchored to that degraded baseline rather than to the condition earlier commitments were intended to achieve.

The original commitment does not disappear because it was fulfilled. It disappears because the gap it was intended to close has been quietly redefined. What was once an obligation becomes, over time, a description of existing conditions. The standard recedes with the shoreline.

The Framework therefore establishes not only a process for monitoring changing environmental conditions, but a process for preserving the institutional record against which future decisions must be measured. Monitoring data, management decisions, restoration commitments, implementation status, and performance measures should remain continuously available, comparable over time, and transparently linked to earlier decisions so that future evaluations are informed by the complete institutional record rather than only by existing physical conditions. The Framework does not determine whether previous commitments were fulfilled. It ensures that those commitments remain visible as future decisions are made.

Visibility does not determine accountability.

But accountability cannot exist without visibility.

This gap extends to what it means to sustain an acceptable condition, not merely to achieve one. No controlling instrument has defined durability, acceptable visual condition, community burden, or acceptable economic outcome for the communities surrounding the Sea. Measures may satisfy a single compliance objective while imposing recurring costs, degrading visual conditions, limiting future land use, or failing to restore economic and recreational value. No governing benchmark exists for those consequences. A program can fully meet its only defined target while every other dimension of what makes a condition acceptable remains undefined.

The Framework does not presume to establish the acceptable condition itself. That determination cannot responsibly be made by a single agency, water district, project sponsor, or advocacy organization. It must be developed through a timely and transparent process led by qualified technical professionals, subject to independent review, and conducted with the direct participation of affected communities and Tribal governments.

The first function of the Framework is therefore to establish and maintain that process.

What condition is acceptable?

Are we there?

If not, what combination of actions is required to get there and remain there?

Before integrated monitoring can have meaning, the system must know what it is monitoring against. Before adaptive management can operate, there must be a defined condition toward which management is directed. Before any federal, state, or local entity can responsibly select among restoration alternatives, including alternatives considered through the United States Army Corps of Engineers Feasibility Study, the condition those alternatives are intended to achieve and sustain must be established.

You cannot responsibly declare "no significant impact" when you have never established the boundary between acceptable and unacceptable.

Until that boundary exists, declarations of compliance, completion, mitigation, significance, or restoration success remain incomplete.

The Right to Know

The purpose of the Framework is not to prove that a particular risk exists.

Its purpose is to ensure that communities have access to the best available understanding of conditions that may affect them, and that uncertainty itself is systematically understood and communicated.

Residents of Mecca, North Shore, Niland, Bombay Beach, Salton City, Brawley, the Torres-Martinez Desert Cahuilla Indian lands and other Sea-affected communities should not be required to assemble information from multiple agencies, studies, jurisdictions, and academic disciplines in order to understand conditions in their own communities.

They have a right to know.

That right extends beyond understanding present conditions. Communities also have the right to understand how current conditions relate to prior

governmental findings, commitments, monitoring results, implementation decisions, and the evolving institutional record. Public understanding should not depend upon reconstructing decades of agency files or assembling fragmented information from multiple proceedings. Institutional continuity should itself become a public resource.

The Framework establishes the institutional capacity necessary to provide that understanding.

In doing so, it transforms dispersed information into actionable public knowledge.

The Federal Nexus

The Salton Sea receives drainage generated by federally authorized Colorado River deliveries. Federal operational decisions influence the quantity, timing, and reliability of those deliveries, and those decisions affect conditions at the Sea.

The federal government owns roughly 40 percent of the lands in and surrounding the Salton Sea and bears substantial responsibilities for the management of those lands, including responsibilities arising under applicable federal and state air quality requirements. The Torres-Martinez Desert Cahuilla Indians' reservation occupies approximately 24,000 acres in and around the Sea, and the federal government also bears trust responsibilities relating to the protection and management of reservation lands affected by conditions at the Sea.

For that reason, federal participation is not incidental. It is structural to the operation of the system itself.

This is not a claim that every consequence is known. It is a recognition that federal actions influence basin conditions, and that those consequences require coordinated understanding and response.

The Coordination Gap

The Salton Sea is not underserved by agencies. It is underserved by coordination.

Numerous public agencies possess authority over portions of the problem. Air quality agencies monitor dust. Public health agencies track health outcomes. Water agencies manage water. Tribal governments manage tribal resources. Federal and state agencies collect scientific information. Universities conduct research.

Each performs an important function. None is responsible for understanding the whole.

The result is a fragmented system in which data, expertise, and responsibility are dispersed across institutions while communities experience the cumulative consequences.

Data exists. Expertise exists. Authority exists. But no entity is responsible for integrating them into a coherent understanding and communicating that understanding to the public.

The Framework does not replace those institutions. It connects them.

The Framework

The Framework of Assurance establishes a permanent, adaptive coordination system built around seven core functions: establishing and maintaining the acceptable condition standard described above, integrated monitoring, hydrologic and exposure modeling, adaptive management, public communication and community notification, interagency coordination, and scientific partnership and community-based research. The latter six functions operate in service of the standard established under the first.

Together, these functions create the institutional capacity necessary to understand changing conditions, identify emerging risks, communicate findings, and inform future management decisions.

Effective governance requires understanding not only changing environmental conditions, but also the institutional history that produced those conditions and the actions undertaken to improve them. Accordingly, the Framework preserves institutional continuity by documenting implementation of governmental commitments, maintaining the evolving administrative record, reporting measurable progress toward the acceptable condition, identifying unresolved obligations, and providing a transparent basis for future public decision-making.

Success is measured not by the elimination of uncertainty, but by the establishment of an acceptable condition standard and the system's demonstrated capacity to identify, understand, communicate, and close the gap between current and acceptable conditions.

The Framework's scientific partnership function encompasses both the generation and communication of knowledge. Neither is complete without the other, and neither is complete without the communities the Framework exists to serve.

Public agencies bear primary responsibility for monitoring, assessment, and mitigation at the Salton Sea. That responsibility is not transferable. Where those responsibilities are not fulfilled, the Framework's accountability function exists to make that failure visible. Community participation does not relieve public

agencies of their obligations. It helps ensure those obligations cannot quietly go unmet.

Communities surrounding the Salton Sea have a right to know what is changing, what those changes may mean for their health and safety, what public agencies are doing in response, and what residents can do in the interim to protect themselves while mitigation strategies are being developed and implemented. That right is not satisfied by data availability. Residents should not be required to assemble technical reports from multiple agencies in order to understand conditions affecting their own communities. The Framework establishes the institutional capacity necessary to translate scientific findings, monitoring results, agency commitments, and implementation progress into accessible public information on a continuing basis, and to notify affected communities promptly when conditions of concern develop.

Subject to the development of technically consistent standards, testing protocols, and quality assurance procedures, the Framework provides for the funding and integration of community-based monitoring programs and other locally directed scientific efforts into the broader monitoring and assessment system. Community-based programs, including those developed by environmental justice advocates and Tribal governments, generate observational data and local knowledge that centralized monitoring alone cannot replicate. Community observations may also identify emerging conditions, localized impacts, or operational concerns before they become evident through periodic agency monitoring. When conducted under protocols that ensure technical consistency and comparability, that data strengthens the overall assessment system and increases public confidence in its findings. The Framework supports the alignment of community-based science with agency-led monitoring efforts and targeted university research so that locally generated knowledge informs rather than duplicates the work of responsible public agencies.

Together these functions transform the Framework from a mechanism for coordinating institutions into an enduring system of public accountability.

The Salton Sea Authority

The Salton Sea Authority is uniquely positioned to serve as the coordinating entity for the Framework.

The Authority's purpose is not to replace existing agencies. Its role is to ensure that existing authorities function as a coordinated system, facilitating coordination, maintaining the institutional record, preserving institutional continuity, supporting scientific integration, and ensuring that communities remain informed as conditions evolve.

The Authority's value lies not in performing every function itself, but in ensuring that the many entities already engaged in Salton Sea issues operate as a coherent system over time.

Federal Resources

The Framework requires dedicated federal resources to be established and sustained at a scale commensurate with the public health obligation it addresses. The Owens Lake dust-control program, which costs more than \$75 million per year to operate at a site one third the size of the Salton Sea, provides a useful benchmark for the level of sustained investment that addressing exposed lakebed conditions requires.

That benchmark describes the scale of sustained investment comparable conditions have required. It does not by itself establish the acceptable condition the Salton Sea must achieve, or confirm that investment at a similar scale would close the gap between current and acceptable conditions at the Sea. Federal investment must be sized to the actions required to achieve and sustain the acceptable condition, not to cost comparison alone.

Federal resources may be secured through multiple channels, including government-to-government consultation, existing federal commitments, and congressional action.

Experience demonstrates that appropriations, environmental review, scientific investigation, planning efforts, and project implementation frequently proceed under different authorities and different time horizons. Effective stewardship therefore requires more than sustained funding. It requires a durable institutional mechanism capable of documenting commitments as they evolve, preserving implementation history, supporting independent evaluation, and providing transparent public reporting over time.

Without that continuity, successive planning efforts risk evaluating progress only from the condition they inherit rather than from the conditions previous commitments were intended to achieve and sustain.

Independent evaluation provides confidence not only that environmental conditions are being measured accurately, but that implementation progress is being measured with equal discipline.

The Salton Sea is not a static condition to be solved once and forgotten. It is a dynamic system whose hydrology, biology, chemistry, and relationship to surrounding communities will continue to evolve as Colorado River operations evolve. The purpose of the Framework is not to predict every future condition. It is to establish the enduring institutional capacity necessary to understand and respond to those conditions as they emerge.

Conclusion

The greatest challenge facing the Salton Sea is not simply what is unknown. It is that no acceptable condition has ever been defined against which what is known, what is uncertain, and what remains to be learned could be measured.

The Framework of Assurance acknowledges that uncertainty is itself a management challenge. Its purpose is not to eliminate uncertainty. Its purpose is to ensure that uncertainty is studied, understood, communicated, and managed through a coordinated, transparent, and accountable public process, directed toward a defined and achievable standard.

Communities living beside the Salton Sea have a right to know what is changing, what those changes may mean, and how public institutions intend to respond.

The Framework is intended to endure beyond any individual project, environmental review, funding cycle, or administration. Its purpose is to ensure that changing environmental conditions, governmental commitments, scientific understanding, and public accountability remain connected through a continuous institutional record capable of informing future decisions. Effective stewardship requires durable institutions.

The Framework establishes not only environmental understanding, but the institutional capacity necessary to act upon that understanding across generations.

The question is not whether conditions at the Salton Sea will continue to change. The question is whether public institutions are equipped to understand and respond to those changes, against a standard they have actually defined.

The Framework of Assurance exists to ensure that they are.