

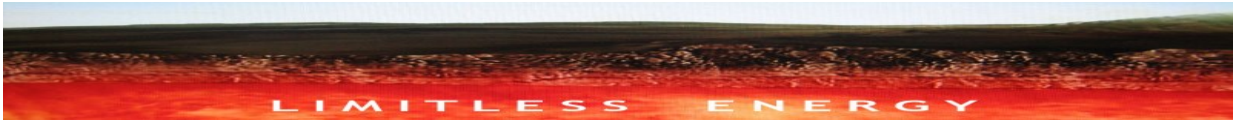
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Relevant to Lithium Valley Commission Response to the “2022 Annual Report on the Salton Sea Management Program”
Nikola Lacic

Relevant to Lithium Valley Commission - Response to the “2022 Annual Report on the Salton Sea Management Program” Nikola Lacic

Additional submitted attachment is included below.



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March 15, 2022

California Natural Resource Agency
715 P Street
Sacramento, CA 95814

Subject: **Response to the “2022 Annual Report on the Salton Sea Management Program” – Nikola Lakic.**

First of all - I am saddened to learn of the passing of former CNRA Assistant Secretary Bruce Wilcox. I met him numerous times. Although we had a different view on how the Salton Sea should look in the future, we agreed to disagree. He was loyal to his close friends. During his speeches (comments) he always cracked a joke or two. His sense of humor was remarkable.

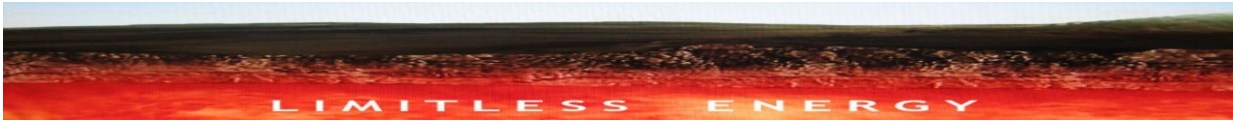
It came to my attention the “2022 Annual Report on the Salton Sea Management Program”. https://saltonsea.ca.gov/wp-content/uploads/2022/02/2022-Annual-Report-English-Feb-24-2022-Final.pdf?utm_medium=email&utm_source=govdelivery.

I would like to comment on the report and expose a few noticeable faultiness of it.

The Project Team - as written on the report: “This 2022 Annual Report was prepared by staff from the California Natural Resources Agency (CNRA), California Department of Fish and Wildlife (CDFW), the California Department of Water Resources (DWR), and the following consultants supporting the Salton Sea Management Program: Cardno, Environmental Science Associates (ESA), MWH, and Tetra Tech”. Acknowledgements: “We acknowledge data, maps, and photographs provided by the various organizations working at the Salton Sea, including the Imperial Irrigation District, Sonny Bono Salton Sea National Wildlife Refuge, Audubon California, and the Oasis Bird Observatory”. (hereinafter “**the State**”). (For this occasion, this paragraph is referred to – **The first reference**)

A few observations:

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, in this report are



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not mentioned consequences that will follow if the “current course of action” continues. (For this occasion, this paragraph is referred to – The **second reference**).

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**).

In the Report is mentioned the North Lake Pilot Project. (For this occasion, this paragraph is referred to – The **fourth reference**).

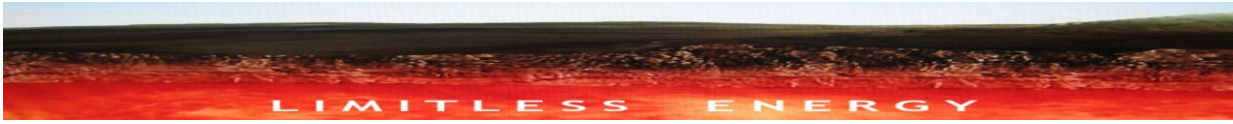
In the Report is mentioned the “Desert Shores Channel Restoration Project”. (For this occasion, this paragraph is referred to – The **fifth reference**).

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**).

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**).

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 **eighth reference**).

In the Report is written the following: “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



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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).

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**).

My comment:

Regarding the **second reference** above, - It is a fundamentally wrong (non-sensical) 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.

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 needed patient because they have experience with piping, leakage, and electricity (again, no pun intended).

The best way to explain why the “current course of action” is non-sensical 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 to 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



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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?

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?

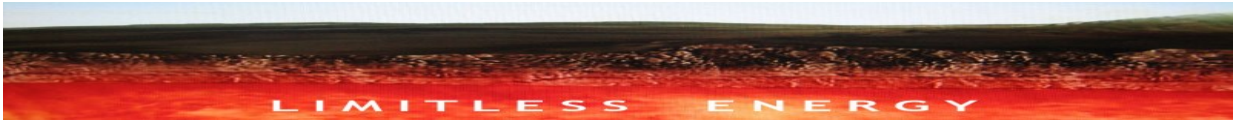
c) Are you going to continue with dust suppression projects – mitigate exposed lakebed - despite the import of seawater that can fill up the Lake to the original water level and eliminate needs for dust suppression projects?

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 supporters (perpetrators) of such an expensive experiment expect to learn more than everybody already knows and is obvious?

Regarding the **fifth reference** above – the Desert Shores Channel Restoration Project:

This is a typical non-sensical 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 non-sensical this concept is. They want to connect the Desert Shores Marina with North Lake with a canal presumably to revive the Desert Shores Marina.



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Just think for a moment. Just to balance 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 are 50,000 acre-feet of water, without circulation water would be stagnated and the North Lake and Marina would soon be infested with algae.

Also, in the Report is written the following: “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”.

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 for 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.

Also, in the Report is written the following: “Work on the Desert Shores Project is expected to start in 2022 upon completion of the environmental compliance and permitting process.”

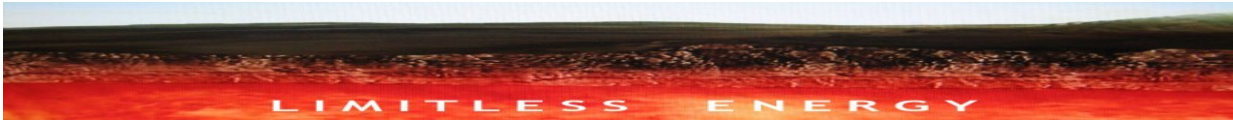
I respectfully urge Secretary Vade Crowfoot, CNRA, Governor Gavin Newsom, and Jared Blumenfeld, EPA, to stop this one and all non-sensical projects and to wait for the report from the Panel of independent reviewers.

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.)

Regarding the **sixth reference** above - “Community Engagement Meetings”:



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It needs to be understood – the “current course of action” has no feasible plan (blueprint) for the restoration of the Salton Sea. Proceeding without a “Master Plan” (blueprint) does not make sense. I have been present at numerous such meetings (workshops) and have posted questions on the postcard, as required, but never received a single answer to my questions. The “Community Engagement Meetings” is a façade (decoy) – to make the impression that the organizers follow protocol (process) and want to hear public comments and to help the public. In fact, regardless of public comment, the organizers are proceeding with the implementation of their plan for their self-interest which will hurt nearby communities, the environment, economy, etc. Such meetings are unproductive and arrogant practices. Also, it is important to say - The public usually complains about the current environmental situation, their health, and incoming ecological disaster, but the public cannot solve the problem by complaining. Also, the public does not have the necessary knowledge, creativity, experience, and has no power to do anything. What is needed is a solution (Master Plan) and then to follow it. I am providing that.

Also, it is not clear the purpose of newly created the “Long-Range Plan Committee”. It seems like a setup framework for the “power control”. The logical questions arise: What is the task of the “Long-Range Plan Committee”? What is the expertise (background) of each member of the Committee? And What is their relationship with the IID and SSA?

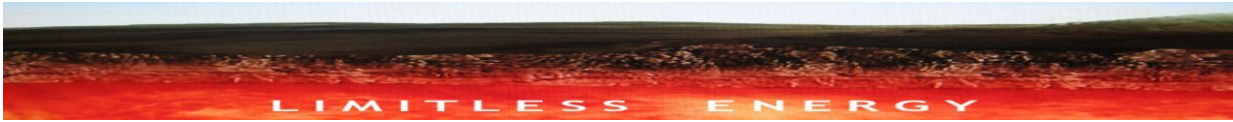
On this point, I would like to state that the current grave situation is caused by serious mismanagement of the local leadership led by the IID and SSA, and then failure of the higher state officials allowing this to happen despite the warning.

Regarding the **seventh reference** above – “Close coordination with IID will allow the SSMP Team to continue to learn from IID’s experience”:

It is important to mention that the IID and the SSA in collaboration with Tetra-Tech and CNRA worked 20 years trying to solve the problem of the Salton Sea. After 20 years of designing and redesigning, they finally come up with their “Masterpiece” – the “Perimeter/Brine Lake” in 2016. Now they are taking credit for their “designing” experience. That is unbelievable but true – it is recorded.

Regarding the **eight references** above - “Monitoring dust controls”:

Again, monitoring dust control and/or increased saltiness of the Lake and frequently reporting the results with colorful diagrams with predictions (projections) of how it will be in 2045 will not solve the problem (incoming ecological disasters). First, we need a solution (a feasible Plan) than to implement it. Only then monitoring and reporting reduction of salinity will make sense. Monitoring dust control will not be necessary.



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Regarding the **night references** above – “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”:

Again, the Report is full of manipulative intentions to speed up permitting process for implementation of their ill-conceived plan which clearly excludes the import of seawater. Also, see the second reference.

Regarding the **first reference** above – the project Team and Acknowledgment:

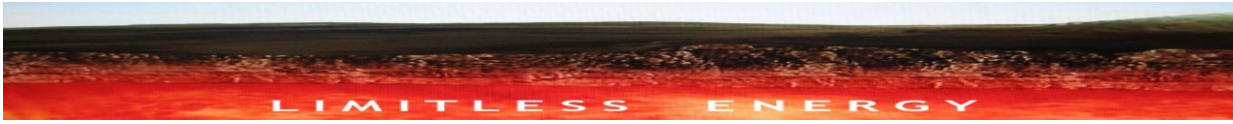
It is interesting that the main initiators (perpetrators) of the “current course of action” which is the “Perimeter/Brine Lake” and related projects now play a low profile in the Team Segment. The Imperial Irrigation District (IID) - is slightly mentioned in the Acknowledgement Segment, and the Salton Sea Authority (SSA) is not mentioned at all. It is obvious that when it comes to accountability the SSA and IID would like to transfer it to the State.

Because I am involved in the issue of the restoration of the Salton Sea since 2013, and because of my expertise in solving environmental (difficult) problems, and because my experience with the SSA is extensive, and because many people are not aware of it - it is my moral obligation to expose the wrongdoing of those two organizations that leads us in ecological and economical disasters.

A few additional useful information:

The SSA is under the strong influence of the IID. I made numerous (over 40) 3-minutes public comments with 10-12 powerful points during the SSA Board Meetings, exposing the faultiness of the “current course of action” and urging them to reverse the course. I was thankful for the opportunity to make several short presentations to several members of the SSA and a few other local officials. During those short meetings, it seemed that they liked my presentation - at least the first part of it when I spoke about dividing the Salton Sea into three sections having one section to “The North Lake”. After those meetings, I never was contacted or consulted – in fact, I was systematically ignored. Later, I read in the public release about “The North Lake” and Enhanced Infrastructure Financing District (EIFD) launched by the Riverside County Board of Supervisors.

Also, the “Perimeter/Brine Lake” plan, which was officially accepted by the State in 2016, has not been mentioned in this report. Instead, wording such as “North Lake” which is a horseshoe shape Lake is used. Such switching the plans without officially consulting with me is unlawful conduct. Although it is not a complete “steal” (it is an amateurish “butchering” of my design – see fifth reference above) - it infringes a



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fundamental element of my patented concept. It also clearly reviles their attempt and the reasoning behind the systematic ignorance of me and my concept. It is important to say for the record, and because the average person and most members of the State, now involved in this case, are not familiar with manipulative conducts perpetrated in the past by a relatively small group of people, it is my moral and legal obligation to expose it.

Similarly, on several occasions, I have criticized the NREL 2015 Report (the study of renewable energy in the Salton Sea) because in that Report the import of seawater was not even mentioned. Here is the link to that report:
[NREL study renewable energy Salton Sea 2015.pdf.](#)

In that report is written the following:” Funded through a grant from the State of California Natural Resources Agency, under Agreement No. 0540-SSA 1, the Salton Sea Authority (SSA) is preparing the Salton Sea Funding and Feasibility Action Plan to address this need.”

It is my understanding that the information for the NREL 2015 Report was provided and funded by the IID and SSA. Later, that report was used as a reference for their further achievements such as SSMP and 10-years plan. I would like to mention that former Governor Jerry Brown in 2015 during the formation of the SSMP and “10-years Plan” requested the inclusion of import of seawater but his demand was ignored. It was/is occasionally slightly mentioned as a possibility far in the future.

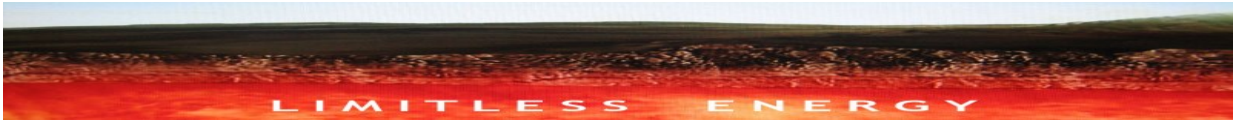
Also, I would like to say that no person or group of people even if they have name Salton Sea AUTHORITY, or a County, has the right to destroy the Salton Sea (in this case getting rid of it) especially when several Counties are involved, and when such conduct is against the interest of nearby communities, environment, and the main principals that the State of California has established.

I am writing this response, not to insult anyone personally, but rather to make stakeholders, and everyone involved - think, especially those who receive fatty salaries with the task to work on the interest of the Salton Sea, our environment, the health of the population, wildlife, water, environmental justice, etc.

In Closing:

There are really two options for the State to choose about the fate of the Salton Sea:

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)



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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 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. (NOTE: A few companies that would benefit from Option I, would benefit even more with Option II, – they just do not understand it yet).

The virtue of the late Steve Jobs, the CEO of Apple Company, was the ability to so-called “Turn on a Dime” when he saw a better solution for something that he was working on despite already invested money, time, and effort.

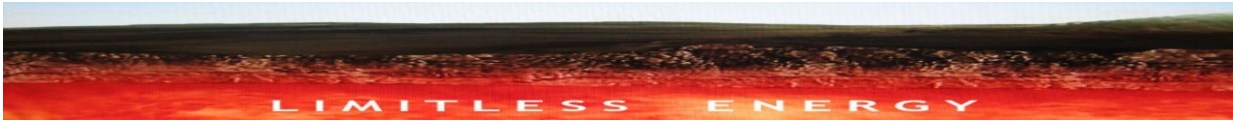
That is characteristic of intelligent people. That is quite different from those who continue with projects that are doomed to fail just because of their previous commitments, efforts, and money that they invested (in this case taxpayers’ money).

The absurdity of this case is that the State continues to fund the projects around the Salton Sea that are contra-productive to the established principles of the State towards the clean environment, the health of the population, renewable energy, prosperity of the nearby communities, and economy of the State in large.

I am hoping that at least one, preferably a few, intelligent persons in the government, that are not under influence of the IID and SSA, can realize the faultiness of the “current course of action” and will start working on stoppage (like injective relief) of the current projects until the Panel of independent reviewers makes a report on the feasibility of import of seawater.

Sincerely,

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