

Comment Letter I56

Hingtgen, Robert J

**From:** Donna Tisdale <tisdale.donna@gmail.com>  
**Sent:** Monday, February 10, 2014 12:03 PM  
**To:** Hingtgen, Robert J  
**Subject:** Fwd: For Soitec DPEIR record - Dudek vs Dr Ponce  
**Attachments:** Soitec DPEIR Dudek v Ponce\_Tisdale 2-3-14.pdf

Robert,

Here is the info I previously sent you on Dudek's errors and failure to accurately analyze the groundwater interconnections in the Poway case.

Dudek's Third Party Review of the Hydrogeologic and Biological Resource information for the Maderas Golf Club groundwater starts at page 173-270 of this linked Poway City Council agenda package for Nov 19, 2013:  
<http://docs.poway.org/WebLink8/DocView.aspx?id=63046&dbid=0>

I have not been able to download and print the report. If you manage to do so, please send me a copy.

Thanks

Donna

----- Forwarded message -----

**From:** Donna Tisdale <tisdale.donna@gmail.com>  
**Date:** Mon, Feb 3, 2014 at 4:22 PM  
**Subject:** For Soitec DPEIR record - Dudek vs Dr Ponce  
**To:** "Hingtgen, Robert J" <Robert.Hingtgen@sdcounty.ca.gov>, "Gungle, Ashley" <Ashley.Gungle@sdcounty.ca.gov>, "Fogg, Mindy" <mindy.fogg@sdcounty.ca.gov>, "Bennett, Jim" <Jim.Bennett@sdcounty.ca.gov>, "Jacob, Dianne" <dianne.jacob@sdcounty.ca.gov>, "Wilson, Adam" <adam.wilson@sdcounty.ca.gov>

**FOR THE SOITEC SOLAR DRAFT PEIR COMMENT RECORD**

Hello Robert,

Please include the attached letter into the record for the Soitec Solar Draft PEIR. Please take notice that the recent Poway groundwater controversy, Dr. Ponce was proven right and Dudek was apparently proven wrong within a short 60-day time frame once pumping resumed at the Madera Golf Club .Dudek's claims that wells were not connected was invalidated. I strongly believe the same is true in the opposing Dudek vs Dr. Ponce reports for the Soitec Solar groundwater investigations.

I have been working closely with professionals on backcountry and desert ground water issues since the late 80's and successfully petitioned the USEPA for designation of the Campo-Cottonwood Creek Sole Source Aquifer, and helped the Ocotillo community secure their designation for the Ocotillo-Coyote Wells Sole Source Aquifer. Water is worth fighting for, and I intend to keep up the fight for as long as I am able.

Thank you,

I56-1

Response to Comment Letter I56

**Donna Tisdale**  
**February 3 and 10, 2014**

I56-1

This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

Donna Tisdale  
619-766-4170

<p><b>DATE:</b> 2-3-14</p> <p><b>TO:</b> Robert Hingtgen, San Diego County Planning and Development Services Via: <a href="mailto:Robert.hingtgen@sdcounty.ca.gov">Robert.hingtgen@sdcounty.ca.gov</a></p> <p><b>FROM:</b> Donna Tisdale, PO Box 1275, Boulevard, CA 91905, 619-766-4170; <a href="mailto:tisdale.donna@gmail.com">tisdale.donna@gmail.com</a></p> <p><b>For the Soitec Solar Project PEIR record: In Dudek vs. Dr. Ponce, Dr. Ponce is proven right</b></p> <p>Dudek and Dr. V.M. Ponce (SDSU) both produced reports on impacts related to groundwater use for Soitec Solar's Boulevard projects. Dudek was recently proven wrong and Dr. Ponce proven right within a short 60 days after controversial irrigation resumed at Sunroad's Madera Golf Club in Poway. Dudek's apparent miscalculations and errors that golf course wells and homeowners wells were served by different aquifers<sup>1</sup>, raises validity concerns for their Soitec Solar investigation.</p> <p>Like the Poway case, Dudek and Dr. Ponce produced opposing reports on the significance of groundwater impacts for the Soitec Solar projects/DPEIR. Dudek's report claims no significant impact while Dr Ponce's in depth report<sup>2</sup> urges caution saying the projects must rely on imported water to protect existing users, groundwater dependent habitat, and sustainability.</p> <p>In the Poway controversy, residents linked impacts to their wells to groundwater pumping at Madera Golf course. Dudek won that political contest when the City Council voted 3-2 to support Dudek's report, denying a connection between wells, and allowed Madera to conditionally pump 173 acre feet (56.4 million gallons)<sup>3</sup>. Ironically, the estimated water use for Soitec's Boulevard projects is also estimated at about 50 million gallons.</p> <p>A short 60 days or so later, Dr. Ponce won the Poway reality contest when Dudek was proven wrong about real world groundwater impacts and sustainability when water levels dropped significantly in impacted wells<sup>4</sup>. His Thompson Creek Groundwater Sustainability Report was produced at the request of homeowners living next to Madera's Golf Club in May 2012<sup>5</sup>. Dudek's now invalidated 2013 report was produced for the City of Poway at a reported cost of \$64,220 and paid for by Madera.<sup>6</sup></p> <p><i>Dr Ponce closed his Poway report stating that: "The Thompson Creek homeowners have been pumping about 30% of the current capture. If sustainable yield is reasonably interpreted as about 30% of the gross recharge, it is seen that not much groundwater is left for others to pump. Thus, the use of large quantities of groundwater for extensive turf irrigation should be discouraged, or else reduced to an amount which is more in line with current practices of groundwater sustainability."</i></p> <p><i>Dr Ponce closed his Boulevard Soitec report stating that: "To remain comprehensive, sustainable (water) yield must include hydrological, ecohydrological, and socioeconomic considerations... No development, no matter how lofty its aim, should place at risk existing natural ecosystems. Other considerations notwithstanding, the Boulevard Soitec projects must resort to imported water to satisfy their needs. Dr. Victor M. Ponce has taught hydrology at San Diego State University since 1980 with close to forty years of experience in the water resources field. Review his research and practice at <a href="http://ponce.sdsu.edu">ponce.sdsu.edu</a>.</i></p> <p>Additionally, the post public comment increase in SDG&amp;E's ECO Substation construction water from the EIR estimated 30 million gallons to 50 million gallons and then to 90 million is also alarming. ###</p> <p><sup>1</sup> <a href="http://m.utsandiego.com/news/2013/nov/20/maderas-golf-water-poway-council/">http://m.utsandiego.com/news/2013/nov/20/maderas-golf-water-poway-council/</a>  <sup>2</sup> <a href="http://www.ponce.sdsu.edu/boulevardsoitec.html">http://www.ponce.sdsu.edu/boulevardsoitec.html</a>  <sup>3</sup> <a href="http://www.pomeradonews.com/2014/01/27/low-water-level-forces-maderas-golf-club-to-shut-down-wells/">http://www.pomeradonews.com/2014/01/27/low-water-level-forces-maderas-golf-club-to-shut-down-wells/</a>  <sup>4</sup> <a href="http://www.utsandiego.com/news/2014/jan/28/maderas-golf-water-wells/all/2print">http://www.utsandiego.com/news/2014/jan/28/maderas-golf-water-wells/all/2print</a>  <sup>5</sup> <a href="http://ponce.sdsu.edu/tcavss.html">http://ponce.sdsu.edu/tcavss.html</a>  <sup>6</sup> <a href="http://www.pomeradonews.com/2012/10/03/maderas-water-study-gains-approval/">http://www.pomeradonews.com/2012/10/03/maderas-water-study-gains-approval/</a></p>	<p><b>I56-2</b> The County disagrees with the commenter's attempt to discredit work performed by County-approved hydrogeologists by reference to a separate controversy that does not concern the Proposed Project or the analysis supporting the conclusions reached in the DPEIR. Contrary to the commenter's assertion, the County does not approve firms to prepare County environmental documents. Rather, it approves individuals. Please refer to common responses WR1 and WR2, and response to comment I10-1 and Appendix 9.0-2 of the DPEIR for a response to Dr. Ponce's whitepaper.</p> <p><b>I56-3</b> The County notes that the water use by the San Diego Gas &amp; Electric ECO Substation cited by the commenter does not concern the Proposed Project. Please refer to response to comment I32-8 for the comparison of the ECO Substation to the Proposed Project. Please also refer to response to comment I56-2.</p>
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