

Comment Letter I9

WELL DONE PUMP SERVICE & SUPPLY, INC.  
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June 1, 2015

[via email to ashley.gungle@sdcounty.ca.gov](mailto:ashley.gungle@sdcounty.ca.gov)

Ms. Ashley Gungle, Project Manager  
 Department of Planning and Development Services  
 COUNTY OF SAN DIEGO  
 5500 Overland Avenue, Suite 310  
 San Diego, CA 92122

RE: Comments on Draft EIR - Jacumba Solar Major Use Permit, PDS 2014-MUP-14-041; PDSS2014-ER-22-001

Dear Ms. Gungle:

I submit the following comments on the above-referenced solar project planned for Jacumba, both as a customer of the local Jacumba Service District and as owner of Well Done Pump Service & Supply, Inc. I sell, install, service and maintain well water pump systems in East County, from Alpine to Jacumba and north to Julian and Laguna. I also serve numerous customers in the Imperial Valley.

I9-1

My 25 plus years of experience in all of the East County gives me firsthand knowledge of the water tables and the impact of increased water use, not only from population growth, but also from new and growing business and industrial activity. Furthermore, the drought in California has resulted in Governor Brown issuing a formal order for curbing usage throughout this State. The entire mountain area has suffered due to the lack of precipitation and the added burden caused by the sale of water by the small water companies in this area. There is evidence of damage to local plants and trees, a greater fire hazard now exists, and the change in depth of water in wells throughout the area has created the need of many residents to install pump savers, booster pumps, and large water storage tanks to ensure the availability of sufficient water for normal everyday use.

I9-2

Response to Comment Letter I9

Marty Kennell

June 1, 2015

I9-1

The County acknowledges receipt of Marty Kennell's input and appreciates the comments regarding the potential impacts associated with implementation of the project. This comment does not address the adequacy of the DEIR, therefore no further response is required.

I9-2

Groundwater impacts were analyzed in three locations in the DEIR, including Section 2.2.3 (Biological Resources), Section 3.1.4.3.4 (Groundwater Resources), and Section 3.1.8 (Utilities). The DEIR concluded that there were no significant impacts to groundwater resources for the Proposed Project (DEIR, pp. 3.1.4-26 to 3.1.5-33.) The Proposed Project would either use a mix of JCSD non-potable water and recycled water from PDMWD or rely entirely on recycled water from PDMWD. The JCSD non-potable groundwater supply well has an upper limit on the amount of water that can be supplied, in terms of maximum pump capacity as established by the JCSD. Beyond that limit recycled water would be provided by PDMWD. Both water sources considered for the project construction activities would be non-potable sources. Use of the non-potable well water from JCSD or PDMWD would not affect abilities to achieve EO B-29-15 intended water conservation.

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I have performed numerous water depth studies for property owners in the last five years in the Boulevard and Jacumba rural areas. Not one well has shown evidence of recharge. On the contrary, there has been loss in water depth of local wells from as little as 30 feet to as much as 150 feet. Therefore, I am baffled by the hydrology studies contained in the Draft EIR. Not ONE privately owned water well system has been monitored by those responsible for the report. How can you make a well-informed decision on this project when you are denied the most basic of information needed for the potential effect on all water sources in this area?

I9-3

In addition, those pushing for approval of this project are telling the residents the sale of non-potable water will have no effect on the quality or quantity of potable water provided for residential use. I know that not to be true. Of further significance is the warnings given by Jim Bennett, the County's groundwater geologist, regarding future inadequate supplies of potable water should we fail to institute guidelines to avoid such shortage. Unfortunately, the disinformation being distributed could eventually lead to serious water shortages to all that live in Jacumba.

I9-4

I previously voiced my disapproval of the Soitec projects in the Boulevard area. I just hope that the Department of Planning and Development Services will properly protect this area of the County from those who have less than honorable intentions for our water sources. The State has had plenty of experience with, and suffered the consequences of, those who have come making promises that they have never been able to deliver.

I9-5

Yours truly,



Marty Kennell

MK:es

**I9-3**

Refer to Response to Comment I9-2. The last five year record of water levels in East San Diego County is coincident with drought conditions with little to no recharge occurring. Wells instrumented with pressure transducers in the Boulevard area recording at a 15-minute interval have shown recharge in response to single storm events (see Appendices 3.1.4-3 and 3.1.4-4 of the EIR); however, the overall trend for most monitored wells is a water level decline over the past several years. No context is provided for the reported water depth loss from as little as 30 feet to as much as 150 feet. The location of the wells, method and frequency of monitoring, pumping status of the wells, well depth, and aquifer type is not reported. The water depth information is anecdotal and not representative of the water level conditions for wells monitored by the JCSD. JCSD has on occasion monitored private wells when access has been granted but single measurements or infrequent measurements from pumped wells are difficult to develop long-term water level trends. The potential impacts would be local to Jacumba as managed by JCSD. Appendices 3.1.4-3 and 3.1.4-4 of the EIR provide information regarding the water levels from well 6 and 4 as well as other known Jacumba data. The data provided includes actual quantities provided for the ECO project, up to approximately 90,000 gallons a day, directly comparable to the levels identified as available to the Proposed Project. The Groundwater Monitoring and Mitigation Plans

	<p>developed for the Proposed Project provides for additional water level monitoring for well located within 0.5-mile of the JCSD production wells provided well access is granted on private property.</p> <p><b>I9-4</b> Refer to Response to Comment I9-2 and C1-2. The commenter does not present any evidence in support of their belief that sale of non-potable water will affect the quality or quantity of potable water available for residential use.</p> <p><b>I9-5</b> The County acknowledges this comment; however it does not address the adequacy of the DEIR, therefore no further response is required.</p>
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