

Bennett, Jim

From: Don <lagoondon@gmail.com>
Sent: Tuesday, May 21, 2019 5:24 PM
To: LUEG, GroundWater, PDS
Subject: Borrego Groundwater Sustainability Plan
Attachments: Comment Letter to Borrego Water District.pdf

Attached is my comment letter on the Borrego Valley Groundwater Sustainability Plan.

Don Rideout
145 Basil St.
Encinitas, CA 92024

Comment Letter on Borrego Valley Groundwater Sustainability Plan

Overall the document is well researched and well written. There is no question that sustainability must be the goal and that the recommended reductions in water usage are necessary to ensure that there is adequate water available in the future for any users.

My comments that follow address the question of what happens to agricultural land after it is fallowed. The options are to convert the land to some type of non-irrigated agriculture, to develop the land for residential purposes, or to preserve the land as open space. Preservation of the land as open space will require the most planning by BWD.

When irrigation of agricultural land is discontinued, the effects will depend in part on the type of agriculture being carried out. Citrus and palm groves represent the majority of acreage. In general, the effects of fallowing will consist of invasion by non-native plants and windblown dust. Both effects would be very negative for the valley. As the document notes, active revegetation with native desert plants can be very expensive, requiring irrigation to get the plants established and significant labor to install and maintain the planting.

My recommendation is to pursue passive restoration. The first step should be to not remove existing palms or citrus trees. The roots of these plants are important in retaining the soil and preventing windblown dust. The document notes that dead citrus trees will be unsightly. While this is true, these dead trees also shade the ground, helping to retain moisture after rain. Standing dead trees have some wildlife value, and they will serve as a reminder to us about how we got into our current predicament.

The next step would be to establish a conservancy to take ownership of the land and have management responsibility. I recommend a new conservancy because I doubt that BWD or Anza-Borrego Desert State Park would be interested in taking ownership of these lands. Management of fallowed agricultural land appears to be outside the mission of any existing governmental or non-governmental entity in our area. I envision the conservancy as being primarily volunteer based to keep costs at a minimum. The conservancy can pursue grants to carry out functions such as invasive weed removal, supplemented by volunteers.

In addition, the conservancy can carry out small scale revegetation projects by collecting seeds and cuttings of native plants from private properties in the valley, with permission from the owners. Plants such as creosote bush, burro bush, palo verde, ocotillo, cholla, jojoba, brittlebush, and many others can be started in this manner. Some minor irrigation may be required initially, but the quantity will be vastly less than either existing agriculture, residential development, or irrigation for dust control. Once these plants become established, they will become self-sustaining without need for irrigation, and they will play a major role in preventing windblown dust and invasion by non-native species. In revegetated areas, remaining dead trees can be cut down to a stump and allowed to degrade naturally. Brush piles can be created in selected areas to provide hiding places for reptiles, birds, and small mammals. We will need to have a realistic timeline for passive restoration. In my experience, 10-20 years will probably be needed to get good coverage with native plants. While some residents might want to see this happen faster, we must remember that desert plants grow and propagate at their own rate. We will need to adjust our expectations accordingly.

The problem of invasive plant species is an enormous one for the community. The best way to combat these weeds is to encourage native plants. We do not want fallow agricultural land to become a new opportunity for these noxious plants to expand. The conservancy will need to have a strong program of weed removal to accompany the passive restoration efforts. Fortunately, it is easier to keep weeds from fallow land because we will be starting with land that has already been cleared.

As former president of the Anza-Borrego Desert State Park Botany Society, I have some background in this subject. I would be happy to volunteer my time to assist with any of these tasks. I realize that our first step is adoption of the plan. However, agricultural land is already being fallowed, and we need to be ready to take effective management actions as soon as possible. Thank you for considering my comments.

Don Rideout
145 Basil St.
Encinitas, CA

and

672 Verbena
Borrego Springs, CA