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B V E F
BORREGO VALLEY
ENDOWMENT FUND

May 21, 2019

County of San Diego
Planning & Development Services
C/O: Jim Bennett
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: Groundwater Sustainability Plan
Borrego Valley Groundwater Basin
Borrego Springs Sub-basin

Dear Mr. Bennett,

Since its inception, the mission of the Borrego Valley Endowment Fund has been inextricably linked to the health and well being of the residents of the Borrego Valley. In fulfillment of its mission The Fund has supported efforts to improve healthcare delivery, to ensure sustainable water supply, and to promote clean air.

We are writing today regarding our concerns about clean air in the Borrego Valley. **We note that Section 5 of the Groundwater Sustainability Plan contains no costs associated with Air Quality Monitoring, which we believe is a significant deficit of this draft of the GSP.**

Attaining the goals of the GSP will necessitate the fallowing of thousands of acres of agricultural land, and fallowed agricultural lands have the potential to significantly and adversely impact the Air Quality of the Valley through increased air pollution. For the past three years The Fund, in partnership with the University of California, Irvine and the Borrego Water District, has supported Air Quality monitoring in the Borrego Valley, with particular attention to particles measuring 2.5 um and 10 um.

Trustees:

Marshal Brecht Andrew Chedrick David Garmon Susan Gilliland Bruce Kelley Robert Kelly
Bill Lawrence David Leibert Caroline Manildi Sylvana Meeks Lorry Seagram

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Air pollution poses a great environmental risk to health. Outdoor fine particulate matter (particulate matter with a diameter $<2.5 \mu\text{m}$) exposure is the fifth leading risk factor for death in the world, accounting for 4.2 million deaths and > 103 million disability-adjusted life years lost according to the Global Burden of Disease Report.

Air pollution can harm acutely, usually manifested by respiratory or cardiac symptoms; as well as chronically, potentially affecting every organ in the body. It can cause, complicate, or exacerbate many adverse health conditions. Tissue damage may result directly from pollutant toxicity because fine and ultrafine particles can gain access to organs, or indirectly through systemic inflammatory processes. Harmful effects occur on a continuum of dosage and even at levels below air quality standards previously considered to be safe.

The issue of Air Quality is of particular concern for the Borrego Valley given our demographic shift toward older age groups and the greater susceptibility to air pollution of those older groups.

Thus, we are writing to suggest that the costs associated with Air Quality monitoring be included in the GSP. We believe Air Quality monitoring will be an essential tool for compliance with the California Environmental Quality Act as the GSP is implemented and agricultural lands are followed.

Thank you,

Bob Kelly
President, BVEF

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