



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,

I am writing to suggest that Groundwater Dependent Ecosystems (GDE's) be designated Beneficial Users of Water with a specified allocation in the Groundwater Sustainability Plan (GSP) that is being developed by the Groundwater Sustainability Agency.

In the draft GSP, GDE's have been excluded from consideration as a Beneficial User of water by a logic that defies credulity: GDE's existed in the Borrego Springs Sub-basin prior to 2015 but were all destroyed prior to 2015 and therefore are not required to be considered in the GSP. And those plant assemblages that were once GDE's and that survived the 2015 "SGMA cut-off" are not really groundwater dependent, but rather *now* derive their water from surface water. The fact of the matter is that natural processes are never as cut and dry as this argument suggests.

Even if the above argument were the case for some of the GDE's in the basin, it is certainly not the case for all of them. In particular, it is not the case for the GDE that exists in Tubb Canyon. While it is true that the water table no longer comes to the surface as it did until 20 years ago, the palms and ironwood trees (*Olneya tesota*) derive their water from the only source that has ever been available to them—the aquifer. The grouping of the ironwood trees from Tubb Canyon toward Borrego Sink (which is clearly visible from Montezuma Grade) attests to the fact that these trees are sustained by the underground recharge river that is a critical part of the Borrego Valley Groundwater Basin.

I urge the GSA to revise the GSP to include GDE's a Beneficial Users of Water with a specific allocation of water, just like all other identified Beneficial Users.

Sincerely yours,

A handwritten signature in black ink, appearing to read "J. David Garmon", is written over a faint, larger version of the signature.

J. David Garmon, MD
President, TCDC

Tubb Canyon Desert Conservancy