



May 17, 2019

Jim Bennett

County of San Diego Planning & Development
5510 Overland, Avenue, Suite 310
San Diego, CA 92123

Re: Draft Groundwater Sustainability Plan for the Borrego Valley Groundwater Basin

Dear Mr. Jim Bennett,

San Diego Audubon Society (SDAS) appreciates the opportunity to comment on the Draft Groundwater Sustainability Plan (GSP) for the Borrego Valley Basin (Plan) being prepared under the Sustainable Groundwater Management Act (SGMA), as an environmental stakeholder in the basin. SDAS is a non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and advocate for a cleaner, healthier environment. The San Diego Audubon Society advocates on behalf of birds, other wildlife and their habitats.

SDAS reviewed the Draft GSP for the Borrego Valley Basin to assess the treatment of groundwater dependent ecosystems and interconnected surface water systems as required by SGMA. SDAS has an interest in sustainable groundwater management because many wildlife habitats and ecosystems rely on groundwater or interconnected surface water. This letter will outline concerns we have with three topics discussed in the GSP: 1) Groundwater Dependent Ecosystems, 2) Beneficial Uses and Users of Groundwater, and 3) Depletions of Interconnected Surface Water Systems.

Groundwater Dependent Ecosystems

The SGMA requires that all beneficial users and uses of groundwater, including Groundwater Dependent Ecosystems (GDE), be considered in the GSP (CWC Section 10723.2). There are three GDE's described in the Plan: Coyote Creek, Palm Canyon, and Mesquite Bosque. Other GDE's mentioned are Hellhole Palms, Tubb Canyon, and Glorietta Canyon, though there is no analysis of their ecological condition, past or present and their hydrological relationship, to the Subbasin. This appears to us to be a significant deficiency. Please revise the GSP to include this information for all of the relevant GDEs and include information on the likely impacts of the lack of ground water sustainability on key species in each of these GDEs.

Beneficial Users and Uses of Groundwater

The Plan designates beneficial users for surface waters including freshwater habitat, wildlife habitat and preservation of rare, threatened or endangered species. Under SGMA, depletions of surface waters interconnected with water in the Subbasin that have significant and adverse impacts on beneficial users of surface waters constitute an undesirable result (CWC Section 10721(x)(6)). There are brief and inadequate descriptions of all three GDE's in the Plan. Coyote Canyon and Palm Canyon list none of the species and/or current dependence on surface water feeding these regions. The descriptions for Mesquite Bosque concentrate on the Honey Mesquite Bosque and other native plants, but doesn't identity specific species. Section 2.1.4 Beneficial Uses and Users of Groundwater (p. 2-26) fails to

identify environmental users of groundwater, including groundwater dependent ecosystems and species that depend on interconnected surface waters. The Least Bell's Vireo is an endangered species with critical habitat on Coyote Creek, and there are numerous other species who should be identified as beneficial users of groundwater. Please perform an accounting of species and add Environmental Users to Table 2.1-7 (p. 2-26).

A USGS (2015) study noted that phreatophytes roots in the Borrego Sink was 15.3 feet though they have been known to reach 150 feet. The historic groundwater table was within 10 feet of the surface at Mesquite Bosque, which was the site of 450 acres of honey mesquite and other native phreatophytes. The Draft GSP describes the honey mesquite bosque as completely disconnected from groundwater as a result of pre-2015 impacts to the groundwater from pumping. But there is no thorough description of the existing ecological conditions of the Mesquite Bosque and the claim that remaining vegetation does not rely on groundwater is based on a rooting depth estimate from one modeling study. Additional research with field studies should be conducted to determine if the Mesquite Bosque is connected to and dependent on groundwater, including between 2015 and 2019.

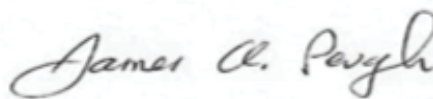
Depletions of Interconnected Surface Water Systems

Section 3.2.6 (p. 3-14) does not identify depletions of interconnected surface waters as an undesirable result because it describes impacts to interconnected surface waters as having occurred prior to 2015. The Draft GSP again describes the Mesquite Bosque as being disconnected from groundwater because of pre-2015 groundwater depletion, but there is insufficient scientific evidence to support this conclusion. The current ecological conditions are not thoroughly described and no field studies are utilized to characterize the relationship between groundwater and the habitat. Without further evidence the Mesquite Bosque should be considered a GDE and interconnected surface water and the sustainability criteria should be defined to avoid significant and unreasonable results to this site. In addition, please provide data on any Federal or State endangered species that rely on the Mesquite Bosque habitat and measures that can be taken for protection.

Because the Draft GSP allows additional declines in groundwater levels while pumping restrictions are phased in, it is critical that GDEs and interconnected surface water systems are accurately identified so that post-2015 impacts can be avoided. Minimum thresholds should be set to prevent further impacts to interconnected surface water systems.

Thank you for your consideration of San Diego Audubon Society's comments on the Draft Groundwater Sustainability Plan for the Borrego Valley Basin. SDAS looks forward to seeing further improvements in the GSP and supports the long-term efforts towards sustainable groundwater management. Please contact us at conservation@sandiegoaudubon.org, or 858-723-7800 if there are further questions.

Sincerely,



James A. Peugh
Conservation Chair
San Diego Audubon Society