

Bennett, Jim

From: Bri Fordem <bfordem@theabf.org>
Sent: Tuesday, May 21, 2019 3:09 PM
To: LUEG, GroundWater, PDS
Subject: GSP Comment: Anza-Borrego Foundation
Attachments: ABF.GSPresponse.pdf

Please see attached comment letter.

Thank you for the opportunity to comment, we look forward to learning more in the future.

Bri

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County of San Diego
Planning and Development Services
C/o Jim Bennett
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Subject: Draft Groundwater Sustainability Plan for the Borrego Valley Groundwater Basin (GSP)

Dear Mr. Bennett:

Thank you for the opportunity to comment on the draft GSP. Our appreciation goes out to the County, the Borrego Water District, the Core Team and the SGMA Advisory Committee for their efforts over the past many months to produce such an impressive document.

Anza-Borrego Foundation (ABF) was founded in 1967 to purchase inholdings from willing sellers within the vast Anza-Borrego Desert State Park® (Park) Since our founding we have added over 55,000 acres to the Park and over the years have funded a wide variety of education, research and resource management projects in the Park. The Park is approximately 1,000 square miles, surrounds the approximate 98 square mile Borrego Springs Subbasin, and supplies the majority of the natural groundwater recharge to the Subbasin (GSP Figure 2.2-1).

Our comments on the draft GSP are as follows:

1. The Park contributes over \$40 million annually to the economy of Eastern San Diego County. The community of Borrego Springs plays a critical role as the hospitality hub for the State Park. To protect this economic vitality, it is essential that the community and the more than 500,000 visitors which it attracts annually have access to an affordable supply of high-quality water for basic needs use in town and for recreation in the Park.
 - a. Allocate a portion for municipal use to ensure an adequate and affordable water supply to support the community's growing role as the primary provider of goods and services to both residents and visitors.
 - b. Don't gamble with water quality. Avoid the threat of diminishing water quality and the necessity for expensive water treatment facilities by shortening the target year to reach sustainability by 2030.
2. It is essential that the plan include ample water for critical at-risk biological resources in the basin. The draft GSP dismisses the relationship of continued pumping on both Groundwater Dependent Ecosystems (the Mesquite Bosque) and historic surface stream flow reductions on major tributaries entering the basin (Coyote Creek and others). There is no solid scientific consensus regarding the viability, survivability and recoverability of these important elements of the desert ecosystem. The people of California have promised to protect this precious desert ecosystem in perpetuity. Therefore, significant efforts to reduce the impact on the valued resources of the Park should be a priority of a plan towards recovery and sustainability of the area.
3. ABF recommends the Groundwater Sustainability Agency ("GSA") adjust the current shares of the estimated sustainable yield by considering proportion of land ownership, historic beneficial use, and feasibility of further reductions of use.
 - a. The draft GSP does not consider the proportion of land each pumper services in the Subbasin. It focuses only on prior use over a five year period. (GSP 3.3.2.1.) According to the draft GSP, the Park covers 27% of the land subject to the GSP. (GSP Table 2.1-2.) The draft GSP also identifies that ABF owns an additional 5% that will be transferred to the Park. (GSP Table 2.1-2.) The Park will have the responsibility of stewardship over 32% of the land that is subject to this GSP, but its water use consists of less than .07% of the total baseline pumping allocation. Yet under the draft GSP, the Park is still responsible for reducing use by 74%.

- b. Whereas the Park is responsible for a large portion of the land and minimal water use, the agriculture sector's responsibility and use are the opposite. According to the draft GSP, the agriculture sector comprises 4.2% of the Subbasin's 62,776 acre surface area and uses 70% of the pumped water. (GSP Table 2.1-1; GSP 2.1.1; and GSP 3.1.4.) Because recent usage data is the only method the GSA used to determine shares of the estimated sustainable yield, the agriculture sector is also being allocated around 71.7% of the total baseline pumping allocation. (GSP Table 2.1-7; and GSP Table 3-6.)
 - c. By failing to give any consideration to the amount of land sustained by each pumper's use, the GSP assigns a significant burden to the Park that may be impossible to bare, resulting in shutting down the Park. The blanket 74% reduction is an ineffective approach to reaching sustainability, particularly where the current use is known to be concentrated in agricultural areas and the agriculture sector will be maintaining its 70% of the water use.
4. There are data gaps in the water quality monitoring particularly in the North Management Area. Wells now in the process of being secured for water quality monitoring will not yield usable initial data for years. The GSP should specify mandatory water quality monitoring of any major wells in the Subbasin. As water quality degrades and additional treatment is required, the cost for ratepayers, including ABDSP, will increase. The GSP should identify Ratepayers as stakeholders in the development of a Water Trading Program. Pumped water is a public resource concern in Borrego Springs.
 5. Fallowing of agricultural land must include the removal of invasive weed species. There are two highly invasive weed species that threaten native habitats, wildflowers, and native species in the Park: Egyptian knapweed (*Volutaria tubuliflora*) and Sahara mustard (*Brassica tournefortii*). Currently, there are fallowed agricultural fields that host these species. State Parks devotes staff time and resources to remove and control these species in the Coyote Canyon area of the Park.
 6. While the Water Trading Program is referred to as an economic incentive that will lead to more water conservation (GSP 4.1), the Water Trading Program is not necessarily the key to water reduction.
 7. ABF supports the immediate implementation upon GSP approval of the mandatory metering program as detailed in Appendix E of the GSP.

We appreciate your considerations of these important needs as you revise the current draft GSP.

Brianna Fordem
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Anza-Borrego Foundation