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TO: Robert Hingtgen, San Diego County Planning and Development Services

Via: Robert.hingtgen@sdcountry.ca.gov

FROM: Donna Tisdale, PO Box 1275, Boulevard, CA 91905, 619-766-4170; tisdale.donna@gmail.com

For the Soitec Solar Project PEIR record: In Dudek vs. Dr. Ponce, Dr. Ponce is proven right

Dudek and Dr. V.M. Ponce (SDSU) both produced reports on impacts related to groundwater use for Soitec Solar's Boulevard projects. Dudek was recently proven wrong and Dr. Ponce proven right within a short 60 days after controversial irrigation resumed at Sunroad's Madera Golf Club in Poway. Dudek's apparent miscalculations and errors that golf course wells and homeowners wells were served by different aquifers¹, raises validity concerns for their Soitec Solar investigation.

Like the Poway case, Dudek and Dr. Ponce produced opposing reports on the significance of groundwater impacts for the Soitec Solar projects/DPEIR. Dudek's report claims no significant impact while Dr Ponce's in depth report² urges caution saying the projects must rely on imported water to protect existing users, groundwater dependent habitat, and sustainability.

In the Poway controversy, residents linked impacts to their wells to groundwater pumping at Madera Golf course. Dudek won that political contest when the City Council voted 3-2 to support Dudek's report, denying a connection between wells, and allowed Madera to conditionally pump 173 acre feet (56.4 million gallons)³. Ironically, the estimated water use for Soitec's Boulevard projects is also estimated at about 50 million gallons.

A short 60 days or so later, Dr. Ponce won the Poway reality contest when Dudek was proven wrong about real world groundwater impacts and sustainability when water levels dropped significantly in impacted wells⁴. His Thompson Creek Groundwater Sustainability Report was produced at the request of homeowners living next to Madera's Golf Club in May 2012⁵. Dudek's now invalidated 2013 report was produced for the City of Poway at a reported cost of \$64,220 and paid for by Madera.⁶

Dr Ponce closed his Poway report stating that: *"The Thompson Creek homeowners have been pumping about 30% of the current capture. If sustainable yield is reasonably interpreted as about 30% of the gross recharge, it is seen that not much groundwater is left for others to pump. Thus, the use of large quantities of groundwater for extensive turf irrigation should be discouraged, or else reduced to an amount which is more in line with current practices of groundwater sustainability."*

Dr Ponce closed his Boulevard Soitec report stating that: "To remain comprehensive, sustainable (water) yield must include hydrological, ecohydrological, and socioeconomic considerations... No development, no matter how lofty its aim, should place at risk existing natural ecosystems. Other considerations notwithstanding, the Boulevard Soitec projects must resort to imported water to satisfy their needs. **Dr. Victor M. Ponce** has taught hydrology at San Diego State University since 1980 with close to forty years of experience in the water resources field. Review his research and practice at ponce.sdsu.edu.

Additionally, the post public comment increase in SDG&E's ECO Substation construction water from the EIR estimated 30 million gallons to 50 million gallons and then to 90 million is also alarming. ###

¹ <http://m.utsandiego.com/news/2013/nov/20/maderas-golf-water-poway-council/>

² <http://www.ponce.sdsu.edu/boulevardsoitec.html>

³ <http://www.pomeradonews.com/2014/01/27/low-water-level-forces-maderas-golf-club-to-shut-down-wells/>

⁴ <http://www.utsandiego.com/news/2014/jan/28/maderas-golf-water-wells/all/?print>

⁵ <http://ponce.sdsu.edu/tcgwss.html>

⁶ <http://www.pomeradonews.com/2012/10/03/maderas-water-study-gains-approval/>

Planning Commission hearing 1-16-15 for Soitec Solar FEIR

Public comments by Ed Tisdale; Morning Star Ranch, Boulevard, CA 91905

My name is Ed Tisdale and I bought my Boulevard ranch in 1963. I am a retired contractor who also served as an expert witness for contract disputes. I have worked around wells, groundwater and geologists for most of my life. For the last 30 years, we have had to fight off one stupid project after another that threatens our community's only source of water, starting with the Campo Landfill in 1987.

To date, that landfill has never been built. We did our own research with an independent geologist and filed complaints against the Dames & Moore geologists with the State Licensing Board. That Board agreed with our analysis that Dames & Moore had not done an adequate job and more work was needed. Dames & Moore quietly left that project.

Now, the experts engaged by Backcountry Against Dumps to independently analyze Dudek's work on Soitec Solar have a total of over 61 years of experience. Dudek's expert claims 10 years of experience and is paid to help get the projects through the process.

The County geologist Jim Bennett seems very capable but he is also young and spread far too thin with too many projects to review and monitor with only one part time intern and limited time and funds. Groundwater sustainability is critical and requires much more funding.

Together, the total experience of both Dudek and County experts falls short of the 61 years of experience between Dr. Ponce and Scott Snyder who are both independent experts and don't have to take direction from any boards.

Last year, Dr. Ponce was proven right and Dudek proven wrong when pumping at Poway's Madera Golf course wells dried up residential wells in 60 days—*Dudek said it would be OK.*

We recognize that directions have been given to force Soitec's project through for political reasons. However, we are not afraid to file complaints and lawsuits against those involved in approving projects that are unlawful in so many ways—and just plain wrong. Please VOTE NO!