



VALLEY CENTER MUNICIPAL WATER DISTRICT

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January 5, 2022

Amy Reeh, *General Manager*
Yuima Municipal Water District
P.O. Box 177
Pauma Valley, CA 92061-0177

Subject: Letter of Comment – Pauma Valley Groundwater Sustainability Agency, Draft Groundwater Sustainability Plan

Dear Ms. Reeh,

First of all, I want to thank you for the opportunity to comment on the Draft Pauma Valley Groundwater Sustainability Agency (PVGSA) Ground Water Sustainability Plan (GSP).

You and the PVGSA should be heartily congratulated for what you have accomplished. Given the complexity of the subject basin in terms of overlying water agencies, private pumpers, Tribal Nations, involvement of state agencies, and the relatively short timeframe for this final effort, the fact that you have completed and are presenting a final GSP is nothing short of a truly remarkable accomplishment. I make this observation, not from the 30,000 feet level, but as one who spent many frustrating hours in innumerable meetings over several years in the initial attempts to form a GSA and move the GSP process forward. As such, I understand what the document before us represents in terms of your and the PVGSA perseverance and commitment.

As for the document itself, it is a comprehensive and reasonable approach to begin the long-term assessment and management of the basin. It is reasonable in that it fully recognizes the constraints of the limited groundwater data throughout the basin. It is comprehensive in that proscribes a thorough and well-thought approach in ongoing data collection efforts, as well as designing and implementing future data collection. The essence of the GSP is that, through data collection over the initial five years of implementation, the initial assessment of the basin's hydrogeologic conditions will be confirmed, refined or even modified. In other words, the main importance of the GSP for the long-term is the data collection regime it establishes today.

That being said, a key element of the GSP's success will be the approach and resources the GSP invests in the data collection, analysis and reporting. Groundwater data collection will have to be complete, consistent, and fully comply with the GSP. Data collection should be done by independent and qualified persons or entities to ensure that professional resources are always available to complete the tasks in a timely manner. Further, the use of outside resources will help to establish trust among all stakeholders that the data itself and the interpretation of the data is reliable. As such, in moving forward, the GSP must provide the resources to fund an ongoing relationship with consultants and/or experts to conduct future data collection, interpretation and reporting. This will be a key element to the success of GSP and the long-term management of the basin.

Again, thank you for the opportunity to comment. In closing, though there are many stakeholders in the basin with diverse interests and perspectives, I trust that we all have one common goal: a commitment to preserving the long-term health and viability of Pauma Valley Groundwater Basin, arguably San Diego County's most valuable groundwater resource. Successful implementation of the PVGW GSP will help to ensure we all achieve that goal.

Sincerely;



Gary Arant
General Manager

Sent Via E-mail to: gsa@yuimamwd.com