DIANNE JACOB

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January 6, 2012

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Ms. Rita Philo
rooehp@yahoo.com

Dear Ms. Philo:

Thank you for your e-mail expressing your concerns with the groundwater use for two proposed dog training ponds in the Hollenbeck Canyon Wildlife Area. I appreciate your sharing your thoughts with me on this matter.

I agree with you that local groundwater should not be compromised as a result of this project and that any ponds should only be created using water run-off.

However, the Hollenbeck Canyon Wildlife Area is owned by the State of California and managed by the California Department of Fish and Game. Therefore, the County of San Diego unfortunately does not have any land use jurisdiction over this proposed project. At this time, the County of San Diego remains a party of interest and has provided comments on the matter to the Jamul-Dulzura Planning Group, as well as communicated the County's initial concerns to the California Department of Fish and Game. I am attaching the County's letter dated December 2, 2011 for your information.

In addition, I am also forwarding your e-mail to Mr. Walt Ekard, the Chief Administrative Officer for the County of San Diego. I have asked him to review your e-mail and respond back to you with any additional information that the County may be able to share on this matter.

Again, thank you for writing. If I can be of further assistance, please feel free to contact me or Adam Wilson of my staff at (619) 531-5522 or via e-mail at **www.diannejacob.com**.

Sincerely,

DIANNE JACOB
Supervisor, Second District

DJ:aw

cc: Mr. Walt Ekard, Chief Administrative Officer, w/ attachment

Enclosure: December 2, 2011 DPLU letter.

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County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

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December 2, 2011

Mr. Michael Casinelli
P.O. Box 613
Jamul, CA 91935

PROPOSED GROUNDWATER USE – HOLLENBECK CANYON WILDLIFE AREA, HONEY SPRINGS UNIT – DOG TRAINING PONDS

Dear Mr. Casinelli:

This letter is in response to your letters dated October 31, 2011 and November 5, 2011. In the letters, you raised concerns about proposed dog training ponds in Hollenbeck Canyon and requested my review of potential impacts on the community's groundwater supply.

The Hollenbeck Canyon Wildlife Area is owned by the State of California (State) and managed by the California Department of Fish and Game (CDFG). The State is not subject to local zoning or land use regulations. Consequently, the County of San Diego does not possess any land use authority over the Hollenbeck Canyon Wildlife Area. According to CDFG staff, there are plans to restore two previously existing stock ponds to train hunting dogs and for wildlife use when dogs are not present. The proposal was contemplated in a Land Management Plan that was circulated for public review in conjunction with a Mitigated Negative Declaration in 2006. CDFG staff further indicated that a groundwater analysis will be performed to determine the rates and quantities of water extraction necessary to sustain the ponds and that the project would only go forward if the analysis demonstrates that the project would not adversely affect neighboring groundwater supplies. CDFG has expressed a commitment to share the results of their analysis with the community once it has been completed.

I have performed a review of the proposed project to aid CDFG in scoping a groundwater investigation for the proposed project. Below are details regarding the proposed groundwater demand, information on the existing production well, and a

scope of groundwater investigation work that should be conducted to evaluate whether the community's groundwater supply could be adversely impacted by this proposal.

Existing Production Well: According to the 2009 report you shared with me, the project at that time was reportedly planning on obtaining its water supply from an existing well labeled as "Hollenbeck Well" on Figure 1. Unfortunately, the well completion report for this well is missing from County Department of Environmental Health files. According to information within a 2009 report your planning group provided me, the well reportedly originally produced at a rate of 800 gallons per minute when first drilled. This is more than likely an error as there has never been a well among hundreds that I have reviewed within a fractured rock aquifer that could produce at such an extraordinary rate.

Additionally, DPLU has historically monitored the water levels within the "Hollenbeck Well" from 1982 to 2009 and a well hydrograph has been provided on Figure 2. Underscoring the wide variability of water levels within a well drilled in a fractured rock aquifer, water levels within this well have varied between 3 and 179 feet below the top of casing (ft btoc) of the well. Water levels were shallowest in April 1983 (3 feet btoc) with historical lows reached in November 1990 and September 2004. Based upon the water level record from this well, the fractured rock aquifer that underlies this area likely has a low storage capacity that is subject to localized rapid declines in the water table. However, the water level declines noted during dryer years recover during the above average rainfall years.

As shown on Figure 2 as red stars, there are 18 single-family residences that are located within ½-mile of the existing well. It is assumed that each single-family residence has its own private well. The "Hollenbeck Well" is located approximately 460 feet from the nearest off-site residential property line.

Water Demand from Proposed Ponds: According to the attached Figure 3 (provided to me by your planning group), there is a proposed advanced pond approximately 1.75 acres in size and up to 40-inches deep, and a proposed puppy pond approximately 0.66 acres in size and up to 40" deep. Lake Barrett, located approximately 7 miles to the east-northeast of the site has a 30-year average evaporation rate of nearly 48" per year based on data from 1975 to 2005. Therefore, the total water demand for the project is estimated to be 2.41 acres x 4 feet/year = 9.64 acre-feet/year. Since this is an approximation, the number will be rounded to 10 acre-feet/year. This would be roughly equivalent to the annual groundwater consumptive use of a 20 lot residential subdivision. Considering the close proximity of the "Hollenbeck Well" to nearby off-site groundwater dependent residences, there is the potential that pumping at this rate could result in potentially significant impacts to off-site groundwater users. However, a groundwater investigation would be required to determine whether there will be significant impacts. Also, there are other existing wells that could be considered for

groundwater production on the former ranch property that may be further away from off-site residences that could reduce potential impacts.

Recommended Groundwater Investigation

The County bases sustainable groundwater yield through usage of the County Groundwater Ordinance as well as the California Environmental Quality Act (CEQA). The *County Guidelines for Determining Significance – Groundwater Resources* (website: http://www.sdcounty.ca.gov/dplu/docs/GRWTR-Guidelines.pdf) provide measurable standards for determining when an impact would be considered significant to groundwater resources pursuant to CEQA. The guidelines were designed to work together to provide a tiered evaluation of groundwater resources, which ultimately determine the sustainable yield for a given project.

The groundwater investigation should be prepared by a California Professional Geologist (preferably a California Certified Hydrogeologist). The main issue that needs to be thoroughly addressed within the groundwater investigation is whether pumping 10 acre-feet per year from the on-site well(s) will result in potentially significant impacts to off-site well users. It is further recommended that the CDFG follow County report formats for the groundwater investigation
(website: http://www.sdcounty.ca.gov/dplu/docs/GRWTR-Report-Format.pdf).

The following information should be included in the groundwater investigation.

1. Introduction.

Discuss the purpose, project location, and project description. The project description must document water demand throughout the project life including construction. This must include estimates for the water demand for all aspects of the project. Maximum anticipated production must be identified for the project. All environmental review will then be based on maximum anticipated production.

2. Existing Conditions.

The project site and project's watershed should be described in detail regarding its physical, geologic, and hydrogeologic characteristics including:

Topographic Setting: A general overview of the project site and overall watershed topographic setting.

Climate: Average and range of at least the past 30 years of precipitation that occurred at the project site as well as the project watershed. Estimated evapotranspiration for the project's watershed.

Land Use: Existing land use plus the maximum allowable density permitted by the County General Plan.

Water Demand: Existing water demand and projected demand at the maximum build-out of the watershed under the County General Plan.

Geology and Soils: Geological setting of the project site and topographic watershed. A description of soil types with regard to their hydrological characteristics.

Hydrogeologic Units: All pertinent Hydrogeologic units within the project site and project's watershed.

Hydrologic Inventory and Groundwater Levels: An inventory of existing water sources and uses within the watershed. The inventory must include all wells, springs, surface ponds and reservoirs. Nearby high-demand water consumers should also be noted (i.e., agricultural operations. The performance records of all existing wells located within the watershed, including well failures and causes of those failures, should be documented to the extent possible. DPLU has historical water levels for several wells within the Honey Springs area that should be incorporated into the report. A figure showing all wells, springs, surface ponds, and reservoirs should be included.

Water Quality: Existing groundwater quality to the extent known within the project's watershed.

3. Groundwater Quantity Impact Analysis

Well Interference Analysis: The locations of each on-site production well should be discussed, and the anticipated amount of pumping that would be expected to occur from each well. If no wells have been drilled, it will be necessary to drill production wells in order that aquifer testing can be conducted to evaluate potential impacts to off-site well users. Aquifer tests should be performed on the anticipated production wells for a minimum of 72 hours or longer depending on the magnitude of groundwater to be utilized along with how long it takes for steady state conditions (or pseudo-steady state) of the cone of depression to be reached. Analysis of well interference to off-site groundwater wells should be analyzed. A 5 year projection of drawdown should be performed using standard hydrologic methods (taking into account the project demand of the project). The projection of drawdown would provide an estimate of impacts to offsite wells as a result of the pumping for five years (similar to a severe drought scenario where no recharge occurs during a five-year period). In the County Guidelines for Determining Significance for Groundwater Resources, the County assumes the following as a significant impact regarding offsite well interference in fractured rock basins: *"As an initial screening tool, offsite well interference will be considered a significant impact if after a five year projection of drawdown, the results indicate a*

decrease of 20 feet or more in the offsite wells. If site-specific data indicates water bearing fractures exists which substantiate an interval of more than 400 feet between the static water level in each offsite well and the deepest major water bearing fracture in the well(s), a decrease in saturated thickness of 5% or more in the offsite wells would be considered a significant impact.

Cumulative Water Balance Analysis: For projects in fractured rock aquifers such as this one, Section 4.1 of the County Guidelines for Determining Significance – Groundwater Resources provide guidance on performing a water balance analysis for this project. Please provide a water balance analysis of the tributary watershed which incorporates the following:

i. Calculate groundwater recharge on a yearly basis over a minimum 30 year time period, typically the past 30 years of record. Because drought conditions cannot be accurately predicted, the utilization of 30 years of historical precipitation data ensures a reasonably foreseeable drought condition will be evaluated.
ii. Compare yearly recharge with the amount of groundwater extraction anticipated to occur for each of those years and calculate the depletion of storage during those years when extraction exceeds recharge;
iii. Track cumulative depletion of storage during successive years of storage depletion; and
iv. Determine if extraction is in excess of sustained yield, which is defined in the County Guidelines as cumulative depletion of storage of greater than 50% capacity of the given basin.

It is recommended that the water balance consider three scenarios, (1) existing conditions groundwater demand, (2) existing conditions plus the project's groundwater demand, and (3) groundwater demand at the maximum buildout the County's General Plan.

4. Summary of Project Impacts and Mitigation

Provide a brief text summary of project groundwater impacts and mitigation. A Groundwater Management and Monitoring Program (GMMP) would be recommended to be developed based on the findings of the groundwater investigation that would include periodic monitoring of well(s) located between the production well(s) and the nearest off-site groundwater well(s). A threshold for maximum allowable groundwater production for the project should be included in the GMMP. Thresholds for water level declines in the monitoring well(s) should be established in the GMMP to ensure that significant declines in groundwater levels do not extend to off-site groundwater users. Should the water level thresholds be met, the GMMP must include mitigation measures that include a reduction or cessation in on-site pumping until water levels in the

monitoring wells rise above the thresholds. Water levels and production should be recorded on at least a quarterly basis.

Our Department appreciates you sharing your concern regarding the proposed ponds. I will be contacting Terri Stewart with the CDFG to discuss this letter and ask to be notified on all groundwater-related investigation work that will be performed for this project. If you have any questions regarding this letter, please contact me at (858) 694-3820 or via email at jim.bennett@sdcounty.ca.gov.

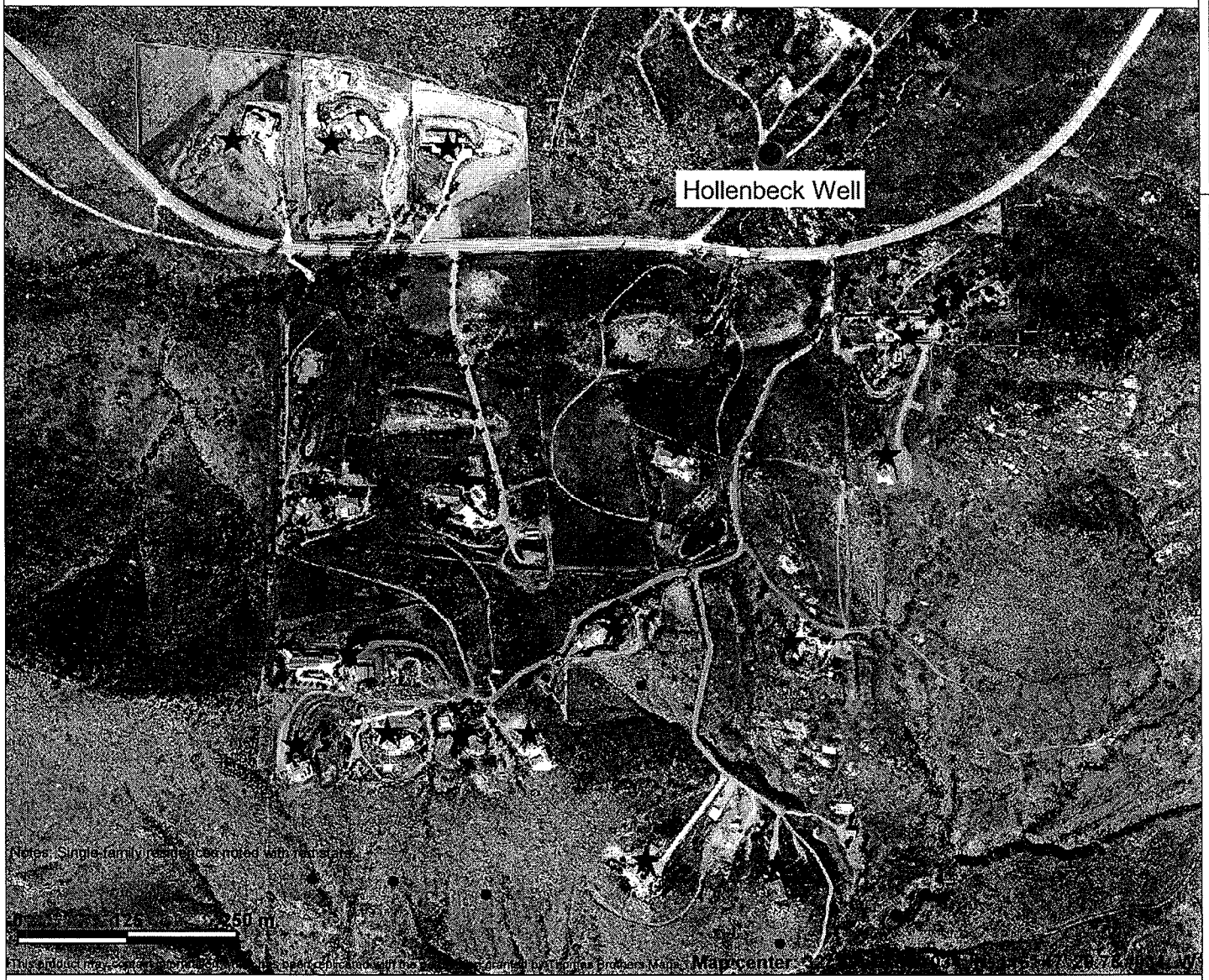
Sincerely,

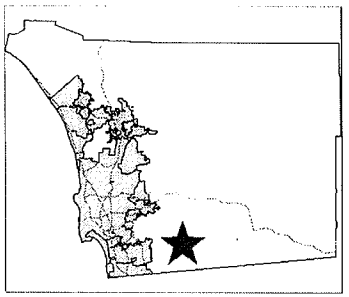
Jim Bennett, County Groundwater Geologist, PG#7707, CHG#854
Project Planning Division
Department of Planning and Land Use

cc: Pat Terry, Honey Springs Homeowners Association, 1833 Honey Springs Road, Jamul, CA 91935
Terri Stewart, California Department of Fish & Game, 3883 Ruffin Road, San Diego, CA 92123

Attachments
Figure 1: Hollenbeck Well Location Map
Figure 2: Hollenbeck Well Hydrograph
Figure 3: Hollenbeck Canyon Wildlife Area, Honey Springs Unit – Dog Training Ponds

Figure 1 - Hollenbeck Well Location Map





Legend

- supply wells
- County Boundary2

Scale: 1:6,857

DPLU GIS

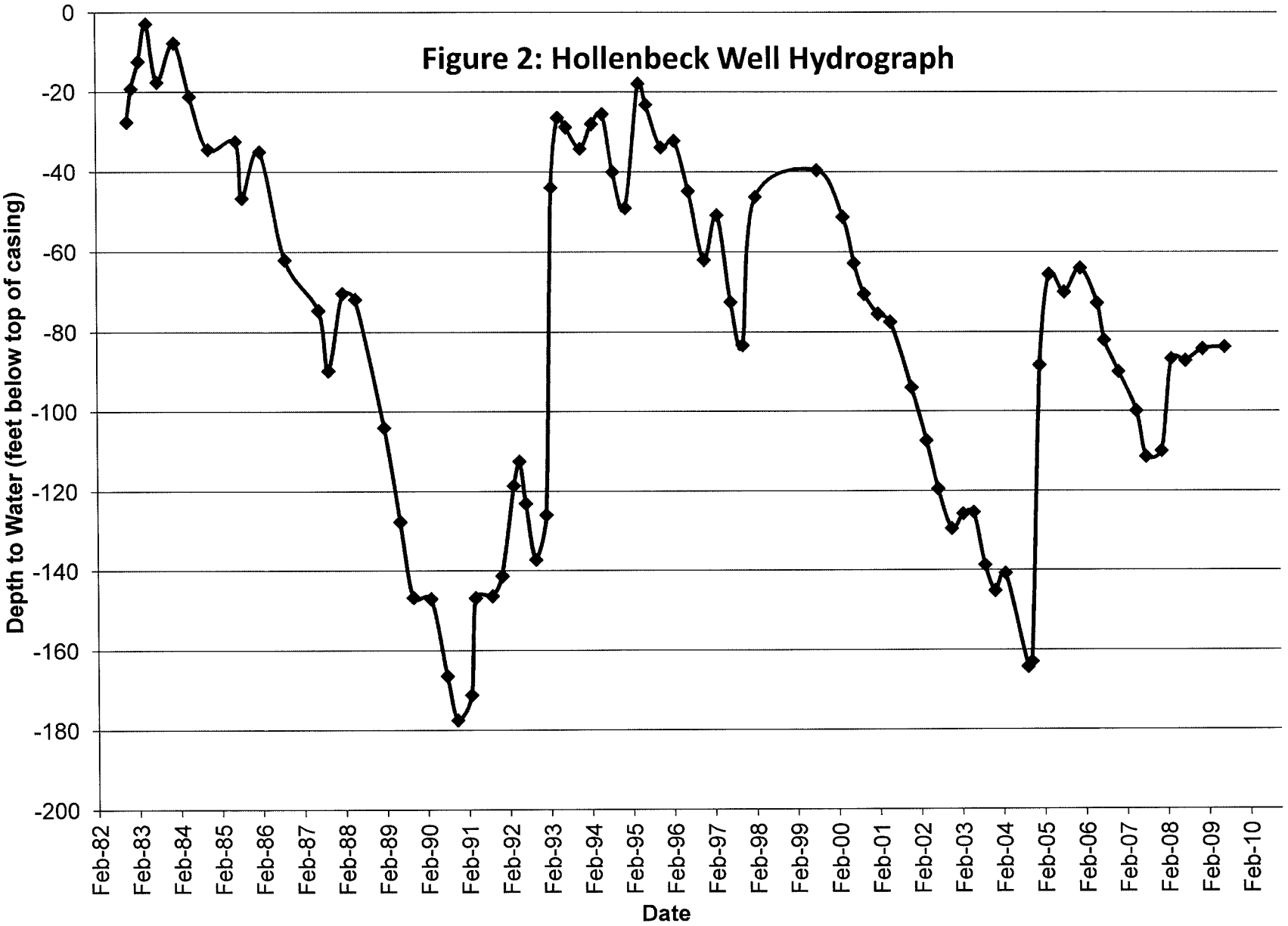


Figure 2: Hollenbeck Well Hydrograph
Depth to Water (feet below top of casing)
0
-20
-40
-60
-80
-100
-120
-140
-160
-180
-200
Feb-82
Feb-83
Feb-84
Feb-85
Feb-86
Feb-87
Feb-88
Feb-89
Feb-90
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Date