Tubb Canyon Desert Conservancy

July 2, 2025

Borrego Springs Watermaster
c/o West Yost Associates
25 Edelman Suite 120
Irvine, CA 92618

VIA EMAIL ONLY

Dear Members of the Watermaster Board,

I write today concerning the Board's consideration of spending substantial funds to evaluate whether the University of California, Irvine's (UCI's) mesquite bosque study constitutes the "best available science." I urge you to consider far more cost-effective and straightforward alternatives that would achieve the same result without burdening the Watermaster's limited budget.

Over the past three years, UCI researchers led by Dr. Travis Huxman have conducted the only comprehensive scientific study of the mesquite bosque in the Borrego Valley Subbasin. The quality and rigor of this research are without question and Dr. Huxman has been available and transparent in presenting findings to this board at each step of the study. Dr. Huxman is a nationally respected scientist, Chair of the Department of Ecology and Evolutionary Biology at UCI, and a leading voice in desert ecosystem research. This work was supported by ~$1 million in Proposition 68 funding from the State of California explicitly for the purpose of providing an on-the-ground assessment—an endorsement that itself reflects rigorous peer-reviewed vetting.

In recent Watermaster meetings, there has been discussion of spending tens of thousands of dollars to verify that the UCI study meets the Board's "best available science" standard. I believe such an expenditure is unnecessary and avoidable. There are at least three alternative pathways, all virtually cost-free, that could provide the Board with the assurance that its Best Available Science Policy requires:

1. **Technical Consultant Literature Review**
   The Watermaster's Technical Consultant could perform a comprehensive literature search/review on the existing available science of the mesquite bosque in the Borrego Valley Subbasin. Given the limited body of research, such a search would take no more than 20 minutes and cost approximately $100 at the Consultant's current rate. This effort

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would make clear that the UCI study is not only the best available science—it is the only available science on the subject of Borrego Springs' mesquite bosque.

2. **Expert Review by Board Member Gina Moran**
   The Board's newest member, Gina Moran, is a trained scientist who oversaw natural resource management for State Parks in the San Diego Coast and Colorado Desert Districts. She is exceptionally well qualified to evaluate both the literature and the UCI study and could provide an informed opinion at no additional cost to the Watermaster.
3. **Independent Scientific Review by Dr. Kevin Hultine**
   If an outside opinion is preferred, Dr. Kevin Hultine, Director of Research at the Desert Botanical Garden in Phoenix, Arizona, provided a review of the white paper proposal for the mesquite study and may be in a position to review the final report at little or no cost.

In light of these options, it would be a poor use of scarce Watermaster resources to commission a duplicative and costly review of science that is already recognized as both rigorous and foundational. Spending tens of thousands of dollars to confirm what a 20-minute literature search can establish is not a responsible use of public funds.

The mesquite bosque is a critical groundwater-dependent ecosystem, and the science developed by Dr. Huxman and his team is indispensable for managing it wisely. Rather than question its credibility, the Board should embrace this study as the cornerstone of sound ecological stewardship.

Thank you for your consideration.

Sincerely,



J. David Garmon, M.D.

President, TCDC

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