

**AGENDA**  
**Borrego Valley Groundwater Basin: Borrego Springs Subbasin**  
**Sustainable Groundwater Management Act (SGMA)**  
**Advisory Committee (AC)**  
January 25, 2018 @ 10:00 AM – 3:00 PM  
**Location: University of California, Irvine**  
**Steele/Burnand Anza-Borrego Desert Research Center**  
**401 Tilting T Drive, Borrego Springs, CA 92004-2098**

**Remote Access:** <https://global.gotomeeting.com/join/732985069> **Call-In:** 1 877 309 2070 **Code:** 732-985-069

**Lunch:** Lunch will be provided at no charge for Advisory Committee members and \$10 for members of the public.

- I. OPENING PROCEDURES [10:00 am – 11:15 am]**
  - A. Call to Order
  - B. Pledge of Allegiance
  - C. Roll Call of Attendees
  - D. Review of Meeting Agenda
  - E. Approval of November 27, 2017 AC Meeting Minutes
  - F. Updates from the Core Team
    - a. Proposition 1 Funding
    - b. Water Supply and Water Quality Act of 2018
    - c. Groundwater Sustainability Plan (GSP) Development Schedule
- II. ITEMS FOR DISCUSSION AND POSSIBLE RECOMMENDATION [11:15 am – 12:00 pm]**
  - A. AC POLICY ISSUE #2: Baseline Pumping Allocation – *Core Team*
- III. TECHNICAL AND POLICY ISSUES FOR INTRODUCTION OR DISCUSSION [12:30 pm – 2:00 pm]**
  - A. Sustainability Indicators– *Core Team & Consultant*
  - B. Water Credits Program – *Core Team & Consultant*
  - C. Projects and Management Actions to be Considered – *Core Team & Consultant*
- IV. INFORMATIONAL ITEMS [2:00 pm – 2:30 pm]**
  - A. Fall 2017 Groundwater Monitoring – Groundwater Levels and Water Quality – *Consultant*
  - B. Public Outreach Efforts – *Core Team*
- V. CLOSING PROCEDURES [2:30 pm – 3:00 pm]**
  - A. Correspondence
  - B. Updates and Comments from Advisory Committee Members
  - C. General Public Comments (comments may be limited to 3 minutes)
  - D. Review Action Items from Previous AC Meetings, Next AC Meeting Date(s), and Next Steps

The next regular meeting of the Advisory Committee will be scheduled for **March, 2018** at the UCI Steele/Burnand Anza-Borrego Desert Research Center (\*location is subject to change).

Please be advised that times associated with agenda are approximations only. Public comment periods will be accommodated at the end of each item listed for discussion and possible action. The duration of each comment period will be at the discretion of the meeting Facilitator.

Any public record provided to the A/C less than 72 hours prior to the meeting, regarding any item on the open session portion of this agenda, is available for public inspection during normal business hours at the Office of the Borrego Water District, located at 806 Palm Canyon Drive, Borrego Springs CA 92004.

The Borrego Springs Water District complies with the Americans with Disabilities Act. Persons with special needs should call Geoff Poole at 760-767-5806 at least 48 hours in advance of the start of this meeting, in order to enable the District to make reasonable arrangements to ensure accessibility. Borrego SGMA Website: <http://www.sandiegocounty.gov/content/sdc/pds/SGMA/borrego-valley.html>

**MINUTES**

**Borrego Valley Groundwater Basin: Borrego Springs Subbasin  
Sustainable Groundwater Management Act (SGMA)**

**Advisory Committee (AC)**

**November 27, 2017 @ 10:00 AM – 3:00 PM**

**Location: University of California, Irvine**

**Steele/Burnand Anza-Borrego Desert Research Center**

**401 Tilting T Drive**

**Borrego Springs, CA 92004-2098**

**I. OPENING PROCEDURES**

**A. Call to Order**

The meeting was called to order at 10:00 a.m. by Borrego Water District (BWD) President Beth Hart.

**B. Pledge of Allegiance**

Those present stood for the Pledge of Allegiance.

**C. Roll Call of Attendees**

**Committee members:** Present: Jim Seley, Jim Wilson, Rebecca Falk, Dave Duncan,  
Bill Berkley, Gina Moran, Ryan Hall, Jack McGrory, Diane  
Johnson

**Core Team members:** Beth Hart, BWD Jim Bennett, County of San Diego  
Geoff Poole, BWD Leanne Crow, County of San Diego

**Staff:** Meagan Wylie, Center Wendy Quinn, Recording Secretary  
for Collaborative Policy Trey Driscoll, Dudek, GSP Consultant  
Derrick Kapalla, County of San Diego

**Public:** Michael Sadler, *Borrego Sun* Linda Haddock, Chamber of Commerce/  
Betsy Knaak, ABDNHA Borrego Water Coalition (BWC)  
Joe Gury, BWC Ray Shindler, independent ratepayers  
Bill Bancroft Ray Burnand

**D. Review of Meeting Agenda**

Meagan Wylie reviewed the meeting ground rules, Agenda and Brown Act provisions.

**E. Approval of October 26, 2017 AC Meeting Minutes**

Upon motion by Member Falk, seconded by Member Berkley and unanimously carried, the Minutes of the October 26, 2017 AC Meeting were approved as written.

**F. Updates from the Core Team**

Geoff Poole reported that the Proposition 1 grant application had been submitted to the State of California (State). A response is expected in early 2018. Member Falk asked whether the socioeconomic component included community outreach, and Mr. Poole replied that it did. Plans include mailings and other contact methods for community members who do not receive water bills. President Hart announced that BWD was prepared to finance its projects in the grant application regardless of whether the grant is approved. Member Seley asked whether farmers who did not indicate their willingness to participate in voluntary metering when BWD distributed its survey could still participate. Mr. Poole explained that five extra meters had been included in the budget to account for this possibility.

Mr. Poole reported that he attended a ratepayers' meeting with Member Duncan, and the Core Team met since the last AC meeting. Member Moran reported that Mr. Poole and Trey Driscoll toured Coyote Canyon with her.

**II. ITEMS FOR DISCUSSION AND POSSIBLE RECOMMENDATION**

**A. AC POLICY ISSUE #1: Metering Requirements for Non-de Minimis Wells**

Mr. Poole noted that there was concern on the part of some farmers as to how metering records would be gathered, stored, transmitted and reported to the State. He and Jim Bennett met with Member Seley and the Agricultural Alliance for Water and Resource Education (AAWARE) to discuss these issues and other GSP topics.

Mr. Bennett pointed out that the AC had continued discussion on the metering policy issue at their September meeting. If the AC recommends required metering, there are two options proposed for data collection: The Groundwater Sustainability Agency (GSA) could inspect, monitor and read meters on a monthly basis and provide an annual statement to the State; or the property owner or an acceptable third party contractor could perform these monthly functions, with the accuracy of the data and the calibration of the meters verified semi-annually by a third party contractor who would then report to the State. The State Department of Water Resources (DWR), citing Government Code section 6254(e), allows the collection of data but exempts certain information, including metering statistics, from the Public Records Act. Legal Counsel for the County of San Diego (County) and BWD concurred.

The second option was a compromise developed by the Core Team with input from AAWARE since the last AC meeting. Member Falk expressed concern that she had not had an opportunity to discuss the revised second option with her constituent group, although they had originally preferred the first option, which had not changed. Member Wilson suggested using the first option, but with verification and calibration done semi-annually.

After further discussion, the AC voted to recommend that required metering for non-de minimis wells be included in the GSP. Using the established comfort levels (1- Agree wholeheartedly; 2- Accept as best option; 3- Can live with it but not enthused; 4- Do not fully agree and want to register view, but don't want to block the decision so will stand aside; 5- Need more work before consensus; and 6- Wants to block the decision), the vote was as follows: Member Moran 1, Member Seley 2, Member Hall 2, Member Berkley 1, Member Wilson 1, Member Duncan 1, Member Johnson 1, Member McGrory 1, Member Falk 1. As to monitoring Option 1, monitoring by GSA, the vote was as follows: Member Moran 1, Member Seley 5, Member Hall 5, Member Berkley 3, Member Wilson 2, Member Duncan 1, Member Johnson 5, Member McGrory 5, Member Falk 1. As to monitoring Option 2, monitoring by the property owner or third party with verification by an acceptable third party, the vote was as follows: Member Moran 5, Member Seley 1, Member Hall 1, Member Berkley 2, Member Wilson 1, Member Duncan 3, Member Johnson 4, Member McGrory 1, Member Falk 5.

#### **B. AC POLICY ISSUE #2: Baseline Pumping Allocation**

Mr. Bennett explained that the baseline pumping allocation is the amount of water pumped prior to the reductions under SGMA. A ten-year average was originally contemplated based on a BWC recommendation, but during subsequent discussions this was highlighted as a problem for some AC members. Trey Driscoll reported that Dudek had considered using a ten-year average, a ten-year maximum or a five-year maximum, and recommended the five-year maximum, using the period 1/1/10 to 1/1/15. Due to current lack of verifiable pumping data from the farmers, evapotranspiration rates are currently being used to estimate the farmers' pumping amounts. Mr. Driscoll reviewed data using each of the three baseline options, and noted that the five-year maximum method had been used in adjudication and prescriptive rights.

Member Berkley noted that at least one of Rams Hill's wells had once been owned by BWD, and for a time Rams Hill and BWD had shared the well. He pointed out that Rams Hill is now irrigating with non-potable water. Member Berkley suggested using aerial photos and evapotranspiration to estimate golf course water usage, as is contemplated for agriculture. Mr. Bennett said that if the farmers provide their extraction data to the Core Team by the end of the year, the information would be reviewed to determine if it could be used instead of the estimates.

#### **The Committee broke for lunch at 12:15 p.m. and reconvened at 12:55 p.m.**

Ms. Wylie suggested delaying the formal request for recommendation on baseline pumping allocation issue until the January AC meeting. In the meantime, Mr. Poole can work with Rams Hill to resolve the issue involving sharing and transfer of wells. Member McGrory expressed concern regarding the possibility that golf courses would have to reduce their water usage so much that the quality of golf would be reduced, affecting the local economy. Ms. Wylie requested that any specific issues/concerns related to this topic that AC or Core Team members want captured in detail, in addition to the summary provided in the minutes, be submitted in writing. The AC is anticipated to make a recommendation on the baseline pumping allocation in January.

### **III. TECHNICAL AND POLICY ISSUES FOR CONTINUED DISCUSSION**

#### **A. Pumping Allowance**

Mr. Bennett introduced Mr. Driscoll's presentation, which would be a conceptual scenario of potential individual pumping allocations following a determination of the baseline. Member Falk pointed out that Mr.

Driscoll's working draft technical memorandum referred to a 70 percent reduction in all sectors (agriculture, recreation and municipal), although the AC had not agreed to that. Mr. Driscoll explained that in this case it was simply used as an example.

Mr. Driscoll explained that the pumping allowance is the maximum allowable groundwater production for each well owner during a given year. It is based on the necessary groundwater pumping reduction to reach sustainable yield. Pumping allowances will be continually reevaluated during the 20-year reduction period. Mr. Driscoll presented three examples of varying levels of reduction, accompanied by illustrative charts and graphs. Based on a United States Geological Survey (USGS) report and the water budget, the Borrego Springs Subbasin's sustainable yield is estimated at 5,700 acre-feet per year.

Mr. Bennett reported that the Core Team is proposing a court validation process of the GSP, once the GSP is finalized. This is not an adjudication, but will limit the time period during which the GSP can be legally contested. President Hart asked what would happen if a large pumper ceases pumping (for example, a farm is fallowed or a golf course closes). Mr. Driscoll said he was looking at ways in which the allocation might be transferred to another well owner. Member Johnson suggested including written information on water laws in the next AC agenda. President Hart suggested she talk to Michael Sadler at the *Borrego Sun* about writing an article for the paper, which can be included in the next AC meeting agenda packet.

**B. Sustainability Period and Reduction Period**

Mr. Driscoll presented the steps underway to develop the Borrego Springs Subbasin's sustainability criteria: Assessment of sustainability indicators (significant and unreasonable conditions, management areas, representative monitoring sites), minimum thresholds, undesirable results, measurable objectives, interim milestones and sustainability goal. He explained that the three management areas, North, South and Central, have differences in water use, geology and other factors and may have different measurable objectives and thresholds. Interim milestones are target values representing measurable groundwater conditions in five-year increments. The measurable objectives are goals for the 20-year timeframe of GSP implementation. Minimum thresholds are quantitative values representing the groundwater condition at a representative monitoring site that when exceeded, may cause undesirable results; for example, a well running dry. Potential undesirable results must be identified for each sustainability indicator.

Member Falk asked whether undesirable results which occurred before 1/1/15, such as water quality degradation, could be dealt with in the GSP. Mr. Driscoll replied that they could, since we are in a critically overdrafted basin. He added that the GSP must develop sustainability goals and explain why each goal will lead to success and maintain it. Betsy Knaak asked whether impacts to the community and local economy, such as challenges faced by restaurants or individuals who have already reduced water use as much as possible, would be addressed. Mr. Driscoll explained that his presentation addressed quantitative issues, but socioeconomic issues are addressed in other SGMA components.

**IV. INFORMATIONAL ITEMS**

**A. Stream Gauge Effort**

Mr. Driscoll reported that the Anza Borrego Desert State Park (State Park), DWR, USGS and BWD had been involved in measurement of stream flows in Coyote Canyon. The gauges are no longer available, and when last in operation, were somewhat inaccurate due to the shifting channel and high sediment rate. Agencies involved met on November 2 to assess the potential of installing new stream gauges. Stream flow has been documented by USGS as the number one source of groundwater recharge in Borrego Springs. However, due to the shifting channel and high sediments, USGS did not recommend installing new gauges. DWR is considering monthly manual stream flow measurements, and the GSA will continue working with the other agencies to collect data and incorporate it into the groundwater model. Mr. Poole added that he is exploring funding available for stream gauges from the State. Member Moran pointed out there is an operable gauge in Palm Canyon.

**V. CLOSING PROCEDURES**

**A. Correspondence**

Ms. Wylie invited attention to the correspondence included in the agenda package on pages 31 through 38.

**B. Updates and Comments from Advisory Committee Members**

Member Falk expressed concern that the BWD website did not include a link to the County website, nor did it list the AC members. She felt this should be addressed as part of the public outreach component of the socioeconomic study, and offered to help with this effort.

Member Johnson reported that the Stewardship Council had discussed the fact that Borrego Springs had moved from an agricultural economy to a tourism focus.

Member Falk urged more of the AC members to publicize their e-mail addresses. Member Johnson agreed to share hers, and others wishing to do so were asked to contact Mr. Poole. Member Duncan noted that his BWD e-mail address had been malfunctioning, and Mr. Poole agreed to work with him. Mr. Poole will establish BWD e-mail addresses for others upon request.

Member Johnson asked whether the AC could form subcommittees, and if so, how many members could participate in each committee. Ms. Wylie agreed to look into it.

**C. General Public Comments**

None.

**D. Review Action Items from Previous AC Meetings, Next AC Meeting Date(s), and Next Steps**

The next AC meeting was scheduled for January 25. Ms. Wylie will update the timeline and work with the Core Team to post minutes and presentations on the County website and the BWD website. Information for the agenda should be sent to Ms. Wylie.

There being no further business, the meeting was adjourned at 2:50 p.m.

January 22, 2018

TO: Advisory Committee

FROM: Core Team

SUBJECT: Item II.B: AC POLICY ISSUE #2: Baseline Pumping Allocation

*Information related to this AC Policy Issue was provided at the September 28, 2017, October 26, 2017, and November 27, 2017 Borrego AC meetings. **Based on feedback received during the October 26, 2017 Borrego AC meeting, revisions have been made to AC Policy Issue #2. The Core Team has revised the baseline pumping allocation to be based on the highest annual production for the five-year period from 2010 through 2014.***

**ITEM EXPLANATION:** Dudek provided a Technical Presentation on the issue of Benchmarking (Baseline Pumping Allocation) at the July 27, 2017 AC meeting. The PowerPoint presentation is available from the County's website. In summary, the Baseline Pumping Allocation establishes historical rates of groundwater extraction (pumping) over a given period of time. SGMA allows for local development of the Baseline Pumping Allocation period. The 10-year period from January 1, 2005 to January 1, 2015 was presented by the Core Team at the September 28, 2017 and October 26, 2017 AC meetings as the proposed baseline period to analyze historical rates of pumping in the Borrego Springs Subbasin.

The Core Team has revised the baseline pumping allocation to be based on the highest annual production for the five-year period from 2010 through 2014. Rationale regarding this revised approach is provided in a memo by DUDEK in the November 27, 2017 AC Agenda Packet. Additionally, previous water credits created by the Borrego Water District and County of San Diego that represent actual reductions in water use are being considered by the Core Team to be counted as part of the baseline pumping allocation under SGMA. This will be further discussed at the January 25, 2018 AC meeting under Item III.B: Water Credits Program.

The AC will be polled for a consensus recommendation on the following question at the January meeting:

#### **AC QUESTION**

- **AC Question:** The baseline pumping allocation will be developed based upon the highest annual water consumption during the 5-year period from January 1, 2010 through December 31, 2014. The pumping allocation will take into account water use by all pumpers within Borrego Springs Subbasin.
- *Do you recommend a Baseline Pumping Allocation (prior to any SGMA required reductions) using the highest annual water consumption based upon the five-year period from Jan. 2010 thru Dec. 2014?*
  - *YES OR NO*

January 22, 2018

TO: Advisory Committee

FROM: Core Team

SUBJECT: Item III.A: Sustainability Indicators

*Sustainability indicators were conceptually presented at the November 27, 2017 AC meeting. Sustainability indicators are the effects caused by groundwater conditions occurring throughout the basin that, when significant and unreasonable, become undesirable results.* The applicable sustainability indicators for the Subbasin include:

- 1) Chronic lowering of groundwater levels
- 2) Reduction in groundwater storage
- 3) Degraded water quality

Groundwater Sustainability Plan (GSP) regulations require establishment of “minimum thresholds” and “measurable objectives” for each applicable sustainability indicator to develop and achieve the sustainability goal.

The three applicable sustainability indicators are strongly correlated and attributable to over-pumping, and can generally be assessed and monitored by measurements of groundwater levels and water quality sampling.

The general approach to defining the required minimum thresholds will be to first evaluate available groundwater level and water quality data to determine appropriate representative monitoring sites, which will include multiple groundwater wells per Subbasin management area. Subsequently, for each representative monitoring site or combination of monitoring sites specific groundwater elevation(s) will be defined, which would be the groundwater elevation below which there would be potential to have undesirable results such as degraded groundwater quality. Likewise, a separate higher groundwater level would be defined for each representative monitoring site as the measurable objective that would represent sustainable conditions without undesirable results. Additionally, intermediate groundwater elevations will be defined for each of the five-year milestones to be used track progress throughout GSP implementation.

Results of the groundwater monitoring of groundwater levels and water quality from the fall 2017, and previously collected historical data, will be used to evaluate the sustainability indicators. Additional information regarding the approach to sustainability indicators will be discussed at the January 25, 2018 AC meeting.

January 22, 2018

TO: Advisory Committee

FROM: Core Team

SUBJECT: Item III.B: Water Credits Program

A discussion of how the Water Credits Program might evolve under SGMA was briefly introduced at the May 15, 2017 Advisory Committee Meeting. In order to address the overdraft condition of the Borrego Springs Subbasin, the Borrego Water District (BWD), in cooperation with the County of San Diego (County), developed and implemented a Demand Offset Mitigation Water Credit Policy (WCP). The WCP establishes credit procedures for fallowing of agricultural land based on crop type and a defined watering intensity. The current WCP for new development consists of two policies: one to satisfy the County *Groundwater Ordinance and Policy Regarding Cumulative Impact Analyses for Borrego Valley Groundwater Use*, and one to satisfy the District's *Policy for Water And Sewer Service to New Developments*, as amended. One water credit is defined as a one acre-foot per year reduction in pumping and converts to the approximate water demand of a single equivalent dwelling unit (EDU) or single-family residence (current BWD residential EDU demand = 0.55 acre-feet per EDU).

An audit of the Water Credits Program was performed to assist with determining whether previously issued water credits should be counted as part of the baseline production allocation water use under SGMA. Preliminary results of the audit and discussion of inclusion of water credits into the baseline production allocation will be discussed at the January 25, 2018 AC meeting.



January 22, 2018

TO: Advisory Committee

FROM: Core Team

SUBJECT: Item III.C: Projects and Management Actions to be Considered

The Core Team has identified six projects and management action categories to be evaluated as part of the Groundwater Sustainability Plan. The six projects and management action categories include:

1. Project 1 - Water Trading Program
2. Project 2 - Water Conservation and Efficiency Programs
3. Project 3 - Modification of Land Use Designations
4. Project 4 - Agricultural Land Fallowing Program
5. Project 5 - Groundwater Quality Mitigation Program
6. Project 6 - Intrabasin Water Transfer

#### Project 1 - Water Trading Program

A basin-specific Water Trading Program will be developed to facilitate transfer of baseline pumping allocation among groundwater users in the Borrego Springs Subbasin (subbasin). The program is anticipated to include the following general components:

- Collaboration of stakeholders and GSA to define the water trading approach.
- Identification of goals, guidelines, and administrative tools for implementation.
- Consolidation and reissue of existing groundwater restrictive easements in a consistent way.
- Development of a governing document to outline guidelines and regulatory procedures to transfer water credits.
- Development of an accounting system to track baseline pumping allocation and water transfers

#### Project 2 - Water Conservation and Efficiency Programs

Evaluation will be performed to assess prospective opportunities for water conservation and efficiency for each of the three primary water use sectors in the subbasin, including agriculture, municipal, and recreation. Considerations for each prospective opportunity would include ability to implement and cost/benefit relationship. The purpose of the potential programs would be to increase the water use efficiency of groundwater users in the Subbasin. Preliminary prospective opportunities to be evaluated are summarized below, by sector:

##### Agriculture:

- Evaluation of the potential effects to water demand from changes in crop types, irrigation practices, etc.

- Evaluation of existing agricultural facilities to identify those where changes in irrigation efficiency practices could be most cost effective.
- Preparation of agriculture-specific water conservation and efficiency plan and irrigation best management practices.

#### Recreation:

- Evaluation of each golf course's irrigation practices to identify opportunities for optimization, associated costs, and anticipated benefit.
- Preparation of recreation-specific water conservation and efficiency plan and irrigation best management practices.

#### Municipal:

- Conservation and efficiency analysis to identify best management practices for water conservation.
- Development of potential landscape restrictive requirements for existing and new development.
- Preparation of municipal-specific water conservation and efficiency plan.

#### Project 3 - Modification of Land Use Designations

An initial evaluation will be performed to assess the potential opportunities for water use reductions by changes in land use designations in the Subbasin. The scope of the evaluation will include the following general components:

- Identification of existing unbuilt residential-designated lots.
- Estimate the appropriate scale of potential land use designation changes.
- Evaluate the potential relationship between a prospective Water Trading Program and changes in land use designations in the subbasin.

#### Project 4 - Agricultural Land Fallowing Program

An Agricultural Land Fallowing Program will be evaluated to address the unsustainable water demand associated with the existing scale of irrigation in the Subbasin. A comprehensive regulatory document will be developed with stakeholder input to outline regulations for land fallowing, which could be incorporated into the GSP or adopted as an independent ordinance by the GSA. Key components of the document to be determined include the following:

- Identification and relationship of existing jurisdictional regulations in place for vacant land.
- Stakeholder buy-in.
- Potential land inspection procedures.
- Future land use alternatives determination process.

- Identification and establishment of easements.
- Land restoration requirements.
- Technical considerations for long-term fallowed land management to avoid adverse environmental and public health impacts.

#### Project 5 - Groundwater Quality Mitigation Program

A Groundwater Quality Mitigation Program will be developed for the subbasin. The scope of the evaluation will include the following components:

- Identification of existing and anticipated future water quality impairment sources.
- Preparation of water quality degradation mitigation alternatives for each potential impairment source.
- Scoping of a regulatory document outlining the procedures for characterizing and mitigating degraded groundwater quality.

#### Project 6 - Intrabasin Water Transfer

Potential mitigation of limited localized groundwater using intrabasin water transfer between Basin Management Areas will be evaluated. The evaluation will include assessment of a transfer program's effectiveness for addressing both groundwater quality impacts and reductions in groundwater storage. The study will involve Borrego Water District (BWD) to assist with evaluating the feasibility and costs of transferring groundwater resources to different areas of the Subbasin.

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**To:** SGMA Core Team  
**From:** Bill Berkley  
**Date:** November 27, 2017  
**Re:** Baseline Allocations

I have reviewed the recently posted agenda and related materials for the Monday Advisory Committee meeting. I wanted to provide the following comments, concerns, and suggestions for the Core Team and Advisory Committee.

- Any use of a historical base period will choose winners and losers based on fluctuations in pumping that may not be reflective of each landowner's reasonable future need. It is therefore challenging to find an equitable method through strict adherence to a base period. I appreciate the difficulty in picking a five-year, ten-year, or any-year base period.
- The use of a 5-year maximum period, as proposed, creates a disparity between agricultural users for whom no verified pumping data is available, and recreational users that have reported their metered water use. There is no legal basis for differentiating between agricultural and recreational land uses in this manner. Both categories of landowners are deemed to possess correlative overlying rights under the law.
- Strict adherence to a historical period with no accommodation would be inequitable to some users, including Borrego Springs Resort (BSR) and Rams Hill, because part or all of these golf courses were temporarily fallowed during the January 1, 2010 to January 1, 2015 period. Therefore, unless BSR and RHGC receive accommodation (e.g., the BSR and RHGC base allocations are determined based on usage before the fallowing commenced), neither an average or highest-use allocation will be acceptable to Borrego Springs Resort or Rams Hill.
- Other adjudications have used other factors to set base allocation, particularly with respect to overlying landowner use as distinguished from municipal/appropriator use. We are also advised that when distributing allocations among landowners, historical use is not definitive, and that other equitable considerations apply, including projected use.
- In some groundwater adjudications, historical periods have been used to set base allocations. However, the use of historical periods has been largely based upon stipulation – which is an agreed-upon contract among the parties to the case. These stipulations do not reflect binding legal rules that apply to other cases.
- To avoid the need for exceptions and use consistent measurements among landowners, a fair solution is to assign a base allocation according to the amount of irrigated acreage on January 1, 2015, multiplied by crop coefficient. Land that was fallowed with the intention of receiving credits would count towards irrigated acreage. This method would more equitably spread the burden of reaching sustainability among all existing land uses. The District's allocation would be assigned based on recent pumping.

Borrego Springs Community Sponsor Group  
P.O. Box 1371  
Borrego Springs, CA 92004

December 31, 2017

Advisory Committee, Groundwater Sustainability Plan  
Borrego Springs

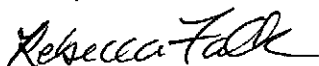
Dear Members & Core Team,

The Borrego Springs Community Sponsor Group would like the representatives for the Agricultural Sector to show good faith toward the town of Borrego Springs by agreeing at the January 25, 2018 meeting that the Municipal Sector of water users in the Borrego Valley will have no reductions made from the Municipal Baseline Water Allocation when reductions in water use are agreed to under the Groundwater Sustainability Plan. This would mean that the Municipal Sector's Baseline Pumping Allocation (estimated at 2461 acre ft/year as the highest year use in the five year period from January 1, 2010 through December 31, 2014 in Dudek's, "Working Draft Technical Memorandum", Table 1, p. 2, in the November 2017 AC-GSP agenda packet) would be both the assumed beginning allocation for the Municipal sector before scheduling of deductions in water use are made, and also that with zero deductions of water for Municipal pumping, that same number of acre feet per year (approximately 2461 af/yr) would be the amount of water allowed to be pumped by the Borrego Water District after all deductions are made by all sectors under the Groundwater Sustainability Plan in order to reach basin-wide sustainability. The water the town needs to survive would therefore be assured under the GSP as a step prior to reductions in water use that would be scheduled for the remaining sectors of agricultural and recreational pumpers.

As the representative from the Sponsor Group to the GSP Advisory Committee, I brought up for a vote at the December 7, 2017 Sponsor Group meeting the method for calculating the Baseline Pumping Allocation proposed at the November GSP meeting. The Sponsor Group refused to consider this without first mandating that I ask the Agricultural Sector to agree to the statements in the above paragraph to show the Agricultural Sector's good faith in wanting Borrego Springs to continue as a viable community with room for modest growth, since that community will be threatened by a reduced water allocation and costs of water should water have to be purchased from other sectors. The Borrego Springs Community Sponsor Group unanimously expressed its strongly held view that the Municipal Sector of residences and businesses who receive their water from the Borrego Water District cannot have any reductions, and should not have to bear the cost of fixing a water overdraft primarily caused by agricultural over-use of water.

As tasked by the Sponsor Group, I will be challenging the Agricultural Sector representatives at the next AC meeting to show their sector's goodwill and support for the continuance of the town of Borrego Springs by agreeing that zero Municipal pumping reductions from the Municipal Baseline Water Allocation will be made in the plans to bring our basin into sustainable use.

Sincerely,



Rebecca Falk  
Representative to the GSP Advisory Committee for the Borrego Springs Community Sponsor Group

Borrego SGMA Advisory Committee (AC) & Core Team (CT)

**Work Planning & Timeline Chart**

*Draft Version 01/22/2018*

Date	Meeting / Milestone / Action	Topics to Discuss / Notes
<b>January 2018</b>		
January 25, 2018	<b>Borrego AC Meeting #9</b> UCI Research Center 10:00am – 3:00pm	<ul style="list-style-type: none"> <li>• <b>AC Formal Recommendation:</b> Baseline Pumping Allocation</li> <li>• Sustainability Indicators</li> <li>• Projects and Management Actions</li> <li>• Water Credits Program</li> </ul>
<b>February 2018</b>		
February, 2018	<b>DWR Proposition 1 Grant Decision</b>	
<b>March 2018</b>		
March XX, 2018	<b>Borrego AC Meeting #10</b> Location TBD 10:00am – 3:00pm	<ul style="list-style-type: none"> <li>• Discussion of Sector Reductions and Allocations (Agricultural, Municipal, and Recreational)</li> <li>• Initial Discussion of Projects and Management Actions                         <ul style="list-style-type: none"> <li>○ Water Trading Program</li> <li>○ Water Conservation and Efficiency Programs</li> <li>○ Land Use</li> <li>○ Agricultural Land Fallowing Program</li> <li>○ Groundwater Quality Mitigation Program</li> <li>○ Intrabasin Water Transfer</li> </ul> </li> <li>• Discussion of draft Well Metering Plan</li> <li>• Prop 1 Grant Tasks (tentative): Decision Support System Model, GoldSim Applicability, SDAC Community Engagement, CEQA documentation, etc.</li> </ul>
<b>April 2018 through June 2018</b>		
Dates TBD	<b>Borrego AC Meeting #11, #12, etc.</b> Location TBD 10:00am – 3:00pm	<ul style="list-style-type: none"> <li>• Projects and Management Actions                         <ul style="list-style-type: none"> <li>○ Water Trading Program</li> <li>○ Water Conservation and Efficiency Programs</li> <li>○ Land Use</li> <li>○ Agricultural Land Fallowing Program</li> <li>○ Groundwater Quality Mitigation Program</li> <li>○ Intrabasin Water Transfer</li> </ul> </li> <li>• Financing Plan (Fees and Penalties)</li> <li>• Potential Regulatory Changes (Land Use, Ordinance Amendments, etc. for implementation of GSP)</li> </ul>

Borrego SGMA Advisory Committee (AC) & Core Team (CT)  
**Work Planning & Timeline Chart**  
*Draft Version 01/22/2018*