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County of San Diego
Planning & Development Services
C/O: Jim Bennet
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Ref: Groundwater Sustainability Plan
Borrego Valley Groundwater Basin
Borrego Springs Sub-basin

Dear Mr. Bennett;

I have spent time in the winter in Borrego Springs for the past eleven years and am an active participant in the Borrego community. During this time, I have learned first-hand about the need to conserve water there. I have also learned about the Groundwater Sustainability Plan (GSP) and would like to share with you some of my main concerns about the implementation of the GSP.

The Borrego Valley aquifer has been drastically over-drafted for many years. Borrego Springs must comply with state law, the California Groundwater Sustainability Act, and come into compliance by 2040. Current and historic water use in the basin has been as follows:

- Municipal pumpers (Borrego Water District or BWD) – 10%
- Recreational pumpers (Golf courses) – 20%
- Agricultural pumpers (Citrus, palm trees, herb and vegetable farms) – 70%

The current GSP seems to recommend an across the board reduction of 74%, which would maintain the current distribution percentages. The residential water use has already been cut from a reported historic high of 3,500 acre-feet/year to the current level of 1,700 acre-feet/year, a reduction of 50%. The Borrego Springs municipal ratepayers have done this through the conscious effort of removing fountains and swimming pools, grass and water intensive landscaping, and converting to low-flow toilets.

In contrast, the recreational and agricultural users have been slow or completely unwilling to make similar reductions, continuing to deplete the aquifer. Clearly the major contributor to the aquifer overdraft has been and continues to be agriculture. Although agriculture has been an important part of the community, it is unreasonable to assume that farming should continue to use 70% of the allocated water.

Therefore, here are some objectives I believe must be included in the implementation of the Groundwater Sustainability Plan.

- ***The municipal baseline pumping allocation (BPA) should be no less than the 1,700 acre-feet/year currently being used by the BWD.*** This is Borrego's only source of drinking water, which should be a priority for the community. This would allow for some limited growth of homes and businesses.

Baseline pumping allocations (BPAs) are arguably one of the most important elements in the implementation process: witness the ongoing battle among stakeholders to establish the highest BPA possible. For reasons unclear to municipal ratepayers, the timeframe set out in the GSP – 2010 to the end of 2014 – is certainly the worst possible interval for BWD. BWD began reducing its usage in 2003, when it pumped 3,926 acre-feet/year. In 2010, BWD pumped 2,730.5 acre-feet/year, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1,700 acre-feet/year.

During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 acre-feet/year. These figures are a clear indicator that the parties responsible for the overdraft were pumpers other than BWD: 70% due to farming, 20% due to recreation/golf courses. *Thus, choosing 2010-2014 as the baseline years to determine BPAs is to the detriment of the town's ratepayers. This timeframe is clearly unfair as it unquestionably favors farmers first and golf courses second, the same pumpers who have created Borrego's critical overdraft situation.*

- ***Sustainability should be achieved sooner than the mandated 20-year period.*** The sooner Borrego can become sustainable, the better chance we have to maintain the water quality of our aquifer. This will also have a beneficial impact on some of the endangered ecosystems in the basin.

I hope you will consider these concerns and modify the GSP implementation to create a fairer and more sustainable solution to Borrego's serious water crisis.

Best regards,

Judith R. Davis