

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

May 14, 2019

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

Dear Mr. Bennett;

The aquifer that serves Borrego Springs has been in overdraft for decades and classifies as critical overdraft today. While residents have responded to this crisis by cutting back water use by over 50% in the past 40 years, agriculture has responded by drilling deeper wells and expanding. The net result is a water table that has already dropped over 100 feet and drops an additional 1-2 feet per year.

Borrego Springs is also in an uncomfortably unique situation in California: due to our geographic isolation we are not able to import water from elsewhere in the state. The aquifer that serves our community is our only source of water and it is in a 70% overdraft situation. Of the water removed from our aquifer annually, agriculture pumps 70%, golf courses pump 20% and residential and business rate-payers in Borrego use the remaining 10% of the total

As a Borrego Springs homeowner, I ask you to support the four objectives toward water sustainability stated by the Borrego Springs Water District Ratepayers for the Groundwater Sustainability Plan (GSP) under SGMA (Sustainable Water Management Act). This plan is currently under public review:

1. BWD Ratepayers should be allocated an initial minimum of 1700 AFY. This total represents an over 50% decrease in our historical average, a result of significant conservation efforts that are already in place. This allocation (1700 AFY) should be excluded from any reductions.
2. The 20-year implementation period set out in our GSP should be shortened significantly or planned reductions should be front-loaded. Straight-line reductions over a 20 year period will result in a greatly lowered aquifer, costlier water pumping and water of poorer quality.
3. Water quality is an essential concern, it should be addressed immediately, and if/when water quality issues are determined the parties responsible must be held to account for any remediation that might be necessary.
4. Groundwater Dependent Ecosystems must be considered in the overall water allocation calculus and timing of reductions. Water set-asides for GDEs are meaningless if the "set-aside water" sits in a drastically reduced water table, unavailable to the ecosystems it is intended to support.

Finally, 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 us, the 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 3926 AF. In 2010, BWD pumped 2730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1700.

During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 AF. 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 2010-2015 as the baseline years to determine BPAs is clearly to the detriment of the ratepayer, and unquestionably favors farmers first, and golf courses next.

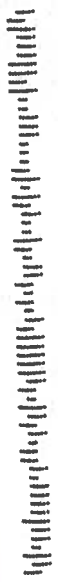
This is patently unfair, arbitrary and in the big picture, manipulative and probably illicit.

THANK YOU,
Jack Sims

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