

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

May 15, 2019

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

Dear Mr. Bennett;

I am a 40-year, year-round resident, homeowner, and manager of a business and employer in Borrego Springs. I thank you for your excellent, hard work in crafting the GSP. I would like to share with you some of my main concerns for our town related to water.

The Borrego Valley aquifer has been drastically over-drafted for many years. We 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) - 10%
- Recreational pumpers (Golf courses) - 20%
- Agricultural pumpers (Citrus, palm trees, herb and vegetable farms) - 70%

The current Groundwater Sustainability Plan (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 cut of 50%. Our community has done this through the conscious effort of removing fountains and swimming pools, grass and water intensive landscaping, and converting to low-flow toilets.

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

Therefore, we have identified some objectives that must be included in the implementation of the GSP:

- The municipal allotment should be *no less than* the 1,700 acre feet/year, which is currently being used by the BWD. This is our only source of drinking water, which should be a priority for our community. This would allow for some limited growth of homes and businesses.
- We believe that sustainability should be achieved sooner than the mandated 20 year period. The sooner we 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.

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 3,926 AF. In 2010, BWD pumped 2,730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1,700 AF.

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 for your attention. I look forward to hearing from you.

Sincerely,



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