

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;

As the Ratepayer Representative for the Groundwater Sustainability Plan we've drafted under SGMA, a plan currently under public review, I'd like to briefly outline what we, the ratepayers of Borrego Springs, wish to see implemented in our process towards water sustainability:

- We, the ratepayers, who use 10% of the water available in the basin and are the only pumpers who have reduced our water usage significantly over these last few years. We therefore believe that the burden of all mandatory reductions should fall proportionately on the other pumpers in the valley. BWD should be allocated a minimum of 1700 AFY as soon as implementation is to begin.
- We strongly believe that a 20-year implementation period is much too long. Our aquifer has already dropped dramatically over the last 30 years. Prolonging this implementation can only affect the quality of our water and the cost of its extraction.
- The valley's native flora and fauna communities have been severely affected as a result of the long-term overdraft of the basin. In order to preserve the remaining ecosystems, two things must happen: first, there must be a set-aside for them; and second, the implementation period must be drastically shortened so as to ensure the survival of the remaining communities.

Although I do know that the position taken by the GSA is that proportional reductions and a 20-year implementation period, along with a hands-off position regarding GDEs, are currently the intended approaches to the GSP, what I would like to hear from you is, if you were in our shoes, what Projects and Management Actions would you utilize, and how would you go about implementing the above four objectives we, the ratepayers, wish to see implemented.

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.

Sal Noceri
1968 Desert Vista Terrace
Rancho Hills