



May 21, 2019

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

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

Dear Mr. Bennett,

I am writing on behalf of the Borrego Village Association (BVA), a 501(c)(6) non-profit corporation, whose mission is to facilitate sustainable economic development of the Anza-Borrego Desert State Park and the unincorporated village of Borrego Springs. Our mission is predicated on the premise that through sustainable economic development we will be able to grow our community sufficiently to be able to sustain healthy schools, a more robust healthcare delivery system, and healthy businesses that support our population.

I am grateful to you and the other members of the Core Team who have worked tirelessly on our behalf to create the draft Groundwater Sustainability Plan. We understand that while SGMA directly addresses hydrological issues, that it is the intent of SGMA to leave communities such as ours as healthy and economically vibrant. In this regard, SGMA and the mission of the Borrego Village Association are well aligned.

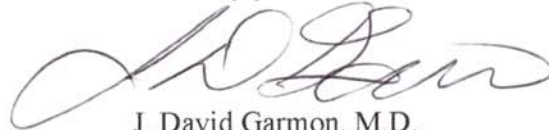
The purpose of this letter is to articulate our strong opposition to the concept of Proportional Reductions across all sectors of current water users, i.e. a 70-75% reduction from baseline allotments for Municipal Users as well as Agriculture and Recreation. In our view, Proportional Reductions are completely inappropriate and unnecessary based on current and historic pumping levels. Municipal Users account for a fraction of the water pumped by Agriculture and a half of what is pumped by Recreation. Neither of these industries is sustainable, thus requiring the community to transition to lower water-use industries, e.g. tourism, that will support the long-term economic sustainability of the region.

BORREGO VILLAGE ASSOCIATION P.O. BOX 1133 BORREGO SPRINGS, CA 92004

We urge the GSA to remedy this shortcoming of the GSP by requiring no reduction in water allotment to Municipal Users beyond their Baseline Allotment of approximately 1700 acre feet per year. Our calculations indicate it would be possible to modestly grow the population of our community if no additional reductions are mandated for Municipal Users in the GSP. We believe modest growth of our population will be possible as a result of the economic development model now being implemented by the Borrego Village Association, and that such growth will lead to the healthy, vibrant community envisioned by SMGA.

Thank you for your consideration. Please do not hesitate to contact me if I may provide you with additional information regarding the interface of the activities of the Borrego Village Association and the issue of Proportional Reductions.

Sincerely yours,

A handwritten signature in black ink, appearing to read "J. David Garmon". The signature is fluid and cursive, with a large initial "J" and "D".

J. David Garmon, M.D.
Acting President, BVA

JDG: ms