

**Borrego Water District Board of Directors**  
**Special Meeting**  
**September 8, 2020 @ 9:00 a.m.**  
**806 Palm Canyon Drive**  
**Borrego Springs, CA 92004**

**Tue, Sep 8, 2020 9:00 AM - 1:00 PM (PDT)**

**Please join my meeting from your computer, tablet or smartphone.**

**<https://global.gotomeeting.com/join/493226125>**

**You can also dial in using your phone.**

**United States: +1 (872) 240-3212**

**Access Code: 493-226-125**

**I. OPENING PROCEDURES**

- A.** Call to Order:
- B.** Pledge of Allegiance
- C.** Roll Call
- D.** Approval of Agenda
- E.** Approval of Minutes - None
- F.** Comments from the Public & Requests for Future Agenda Items (may be limited to 3 min)
- G.** Comments from Directors
- H.** Correspondence Received from the Public (3-9)
  1. Hemp Cultivation in Coyote Creek Watershed and Potential Impact to BS Basin Inflows – G Worobee

**II. ITEMS FOR BOARD CONSIDERATION AND POSSIBLE ACTION**

- A.** San Diego County Water Authority Proposed Regional Conveyance System (RCS) through Borrego Springs. – L Brecht (10-17)
- B.** Draft Response to County's Email from BWD Regarding Unknown Status of Wells in Subbasin – G Poole (18-21)
- C.** Begin Process to Replace Twin Tanks – D Dale/G Poole (22)
- D.** Selection of Consultant to Upgrade SCADA/Telemetry System – D Dale (23)
- E.** Borrego Spring Basin Interim Watermaster (24-28)
  1. Final Memo to Interim Watermaster of Subbasin Regarding Some Initial Risk Management Issues for WM's Consideration – L Brecht
  2. Watermaster Request for BWD Assistance with Meter Reading – G Poole
  3. Agenda Items for September 10, 2020 –G Poole: VERBAL

AGENDA: September 8, 2020

All Documents for public review on file with the District's secretary located at 806 Palm Canyon Drive, Borrego Springs CA 92004. Any public record provided to a majority of the Board of Directors less than 72 hours prior to the meeting, regarding any item on the open session portion of this agenda, is available for public inspection during normal business hours at the Office of the Board Secretary, located at 806 Palm Canyon Drive, Borrego Springs CA 92004.

The Borrego Springs Water District complies with the Americans with Disabilities Act. Persons with special needs should call Geoff Poole – Board Secretary at (760) 767 – 5806 at least 48 hours in advance of the start of this meeting, in order to enable the District to make reasonable arrangements to ensure accessibility.

If you challenge any action of the Board of Directors in court, you may be limited to raising only those issues you or someone else raised at the public hearing, or in written correspondence delivered to the Board of Directors (c/o the Board Secretary) at, or prior to, the public hearing.

**III. STAFF REPORTS (29-30)**

- A. Water Sales and Revenues Update: J. Clabaugh
- B. Publication of Documents – G Poole
  - 1. T2 attorney's suggested letter to SDCWA re: RCS
  - 2. BWD Final Draft Letter to SDCWA re: RCS
- C. Tentative Schedule with Fieldman Rolapp Associates (FRA) and Raftelis Financial concerning CIP financing plan, Cost of Service Study, and Developer's Policy charges. – G Poole
- D. BWD Website Update – M Panchal – VERBAL

**IV. CLOSED SESSION:**

- A. Conference with Legal Counsel - Significant exposure to litigation pursuant to paragraph (3) of subdivision (d) of Section 54956.9: (One (1) potential case)
- B. Conference with Legal Counsel – Existing Litigation (BWD v. All Persons Who Claim a Right to Extract Groundwater, et al. (San Diego Superior Court case no. 37-2020-00005776)
- C. Performance Review: Performance Evaluation of General Manager: GM Performance Review – Conference for Public Employee Performance Evaluation - Title: General Manager Employee Performance Review- pursuant to subdivision (d) (4) of Government Code Section (Government Code § 54957)

- V. CLOSING PROCEDURE:** The next Board Meeting is scheduled for September 22, 2020 at Borrego Water District, 806 Palm Canyon Drive, Borrego Springs, CA 92004

AGENDA: September 8, 2020

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BORREGO WATER DISTRICT  
BOARD OF DIRECTORS MEETING  
SEPTEMBER 8, 2020  
PUBLIC COMMENT

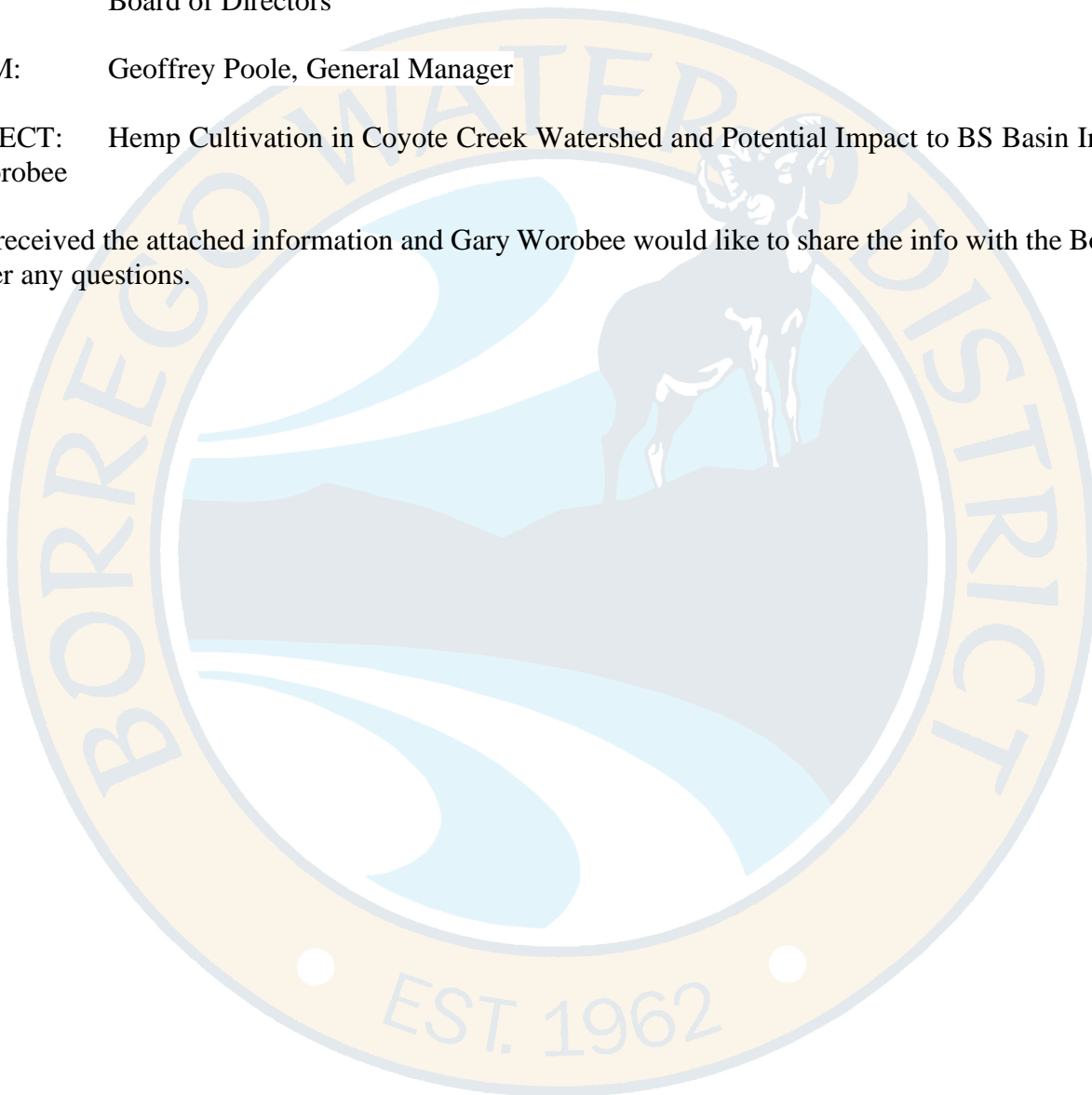
September 2, 2020

TO: Board of Directors

FROM: Geoffrey Poole, General Manager

SUBJECT: Hemp Cultivation in Coyote Creek Watershed and Potential Impact to BS Basin Inflows –  
G Worobee

Staff received the attached information and Gary Worobee would like to share the info with the Board and answer any questions.



Geoff Poole  
General Manager  
Borrego Water District  
806 Palm Canyon Dr,  
Borrego Springs, CA 92004

Geoff,

Thank you for your concern regarding the water issues involving industrial hemp cultivation within the Anza-Terwilliger Water Basin and for the opportunity to address your board on this topic. While the physical area we are speaking of is 15 miles away, as you know water maintains no boundaries. A rainstorm or snowfall here in Anza is a part of the recharge of your aquifer days or weeks later. We here in the Anza Valley applaud the Riverside County Planning Department for their consideration in excluding the Santa Margarita River Watershed from both indoor and outdoor industrial hemp cultivation. Hemp has proven to be a very water thirsty plant and is not conducive to areas with unknown water/irrigation resources.

Our concern now is the area that is outside the Santa Margarita River Watershed to the east but inside the Anza-Terwilliger Water Basin as defined by the USGS. Please note the following excerpt from the attached USGS report.

[https://www.usgs.gov/centers/ca-water/science/evaluation-groundwater-resources-anza-terwilliger-area-anza-california?qt-science\\_center\\_objects=0#qt-science\\_center\\_objects](https://www.usgs.gov/centers/ca-water/science/evaluation-groundwater-resources-anza-terwilliger-area-anza-california?qt-science_center_objects=0#qt-science_center_objects)

*“Groundwater is the sole source for water use to the rural community and two Native American tribes in the Cahuilla Valley and Terwilliger Valley groundwater basins, which are located approximately 35 miles southwest of Palm Springs, California. The characteristics and sustainable yield of the basins are not well understood and are threatened by increasing water use and potential changes in water sustainability related to climate change. The study area encompasses the rural community in and around the town of Anza, the Cahuilla Band of Indians Reservation, and the Ramona Band of Cahuilla Reservation; it is located in the headwaters of the Santa Margarita River Watershed in Riverside County. The hydrologic system of this area comprises a fractured bedrock aquifer and an alluvial aquifer. Interactions between these aquifers are not fully understood and the increase in groundwater use **has raised concerns of potential changes in water sustainability.**”*



The study also indicates:

*“The study area covers approximately 83,000 acres of land in rural Riverside County and San Diego County. It contains parts of **Anza-Borrego Desert State Park**, Beauty Mountain Wilderness, and Mount San Jacinto State Park”*

Other studies have also indicated the Coyote Canyon/Coyote Creek water flow has a considerable impact on the Borrego Water Basin.

[https://ca.water.usgs.gov/projects/borrego/documents/Netto\\_Masters\\_2001.pdf](https://ca.water.usgs.gov/projects/borrego/documents/Netto_Masters_2001.pdf)

<https://www.sandiegocounty.gov/content/dam/sdc/pds/SGMA/Chapter-2-Plan-Area-and-Basin-Setting-clean.pdf>

In consideration that the industrial hemp cultivation area in question is at the headwaters of Coyote Creek we are concerned not only for our own water sustainability but that of our neighbors to the southeast namely Borrego Springs.

It is important that we get ahead of this unlike situations regarding the aquifer in Paso Robles or even the situation with citrus grows in Borrego Springs. We do not want good intentioned farmers after spending money on infrastructure only to have to shut down because of water constrictions.

<https://www.sanluisobispo.com/news/local/environment/article236864238.html>

In consideration of the lawsuit filed Aug 4, 2020 by the Borrego Water District “for a determination by the Court of all groundwater rights” and the imminent appointment of the “Watermaster Board of Directors” we would respectfully request that the Borrego Water District Board of Directors address a letter to the Riverside County Board of Supervisors asking for a moratorium on hemp cultivation permits in the Anza Terwilliger Water Basin until such time as a proper water study can be completed to determine if industrial hemp cultivation is a sustainable entity in the Anza-Terwilliger Water Basin as defined by the USGS.

Looking forward to addressing your Board of Directors on September 8th at 9:00 am.

Thank you

Gary Worobec  
[www.takebackanza.org](http://www.takebackanza.org)  
951-763-0518

Attachments:

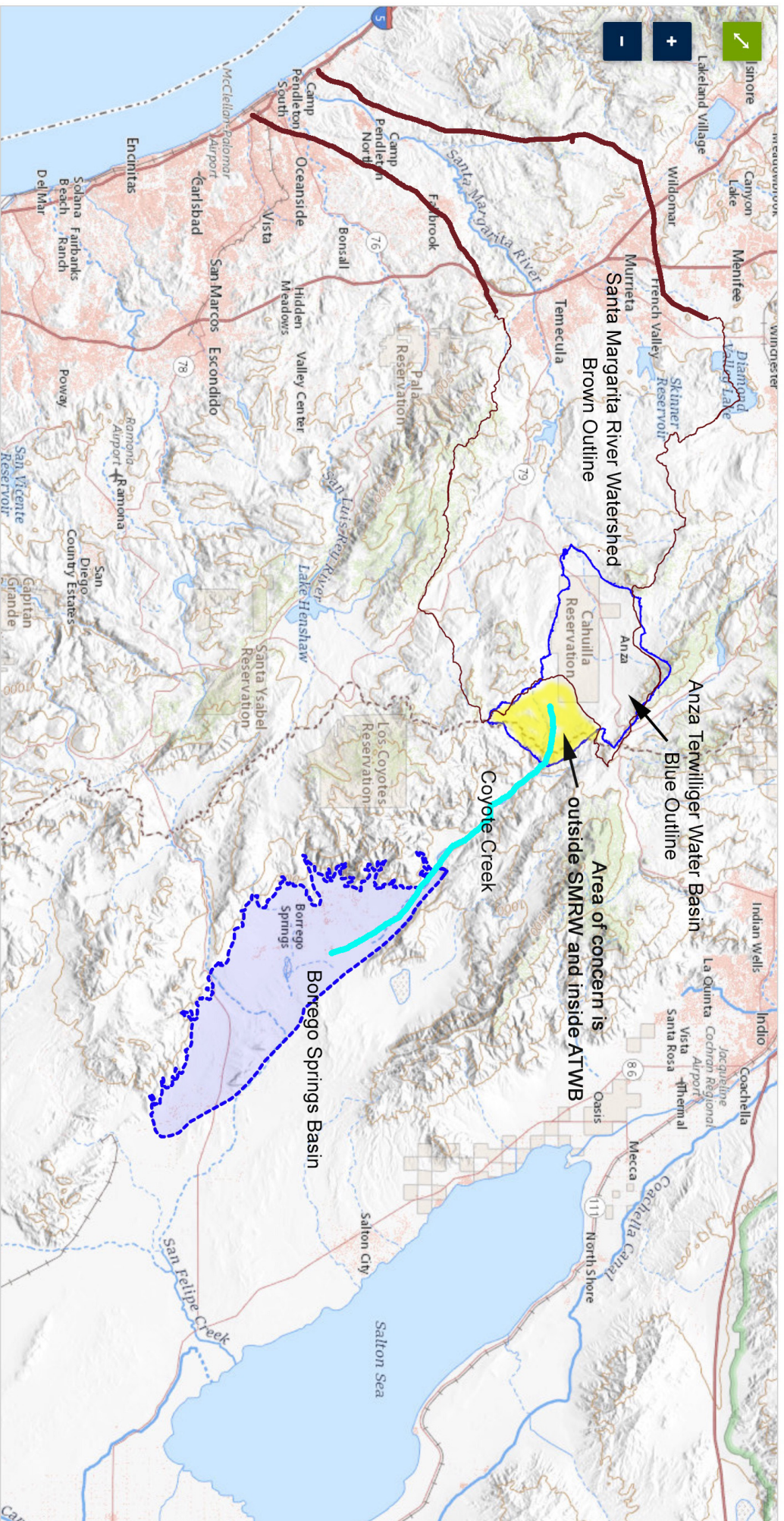
MAP, Borrego Valley Ground Water Conditions

MAP, Santa Margarita River Watershed with Anza Terwilliger Water Basin Overlay

Hemp Timeline

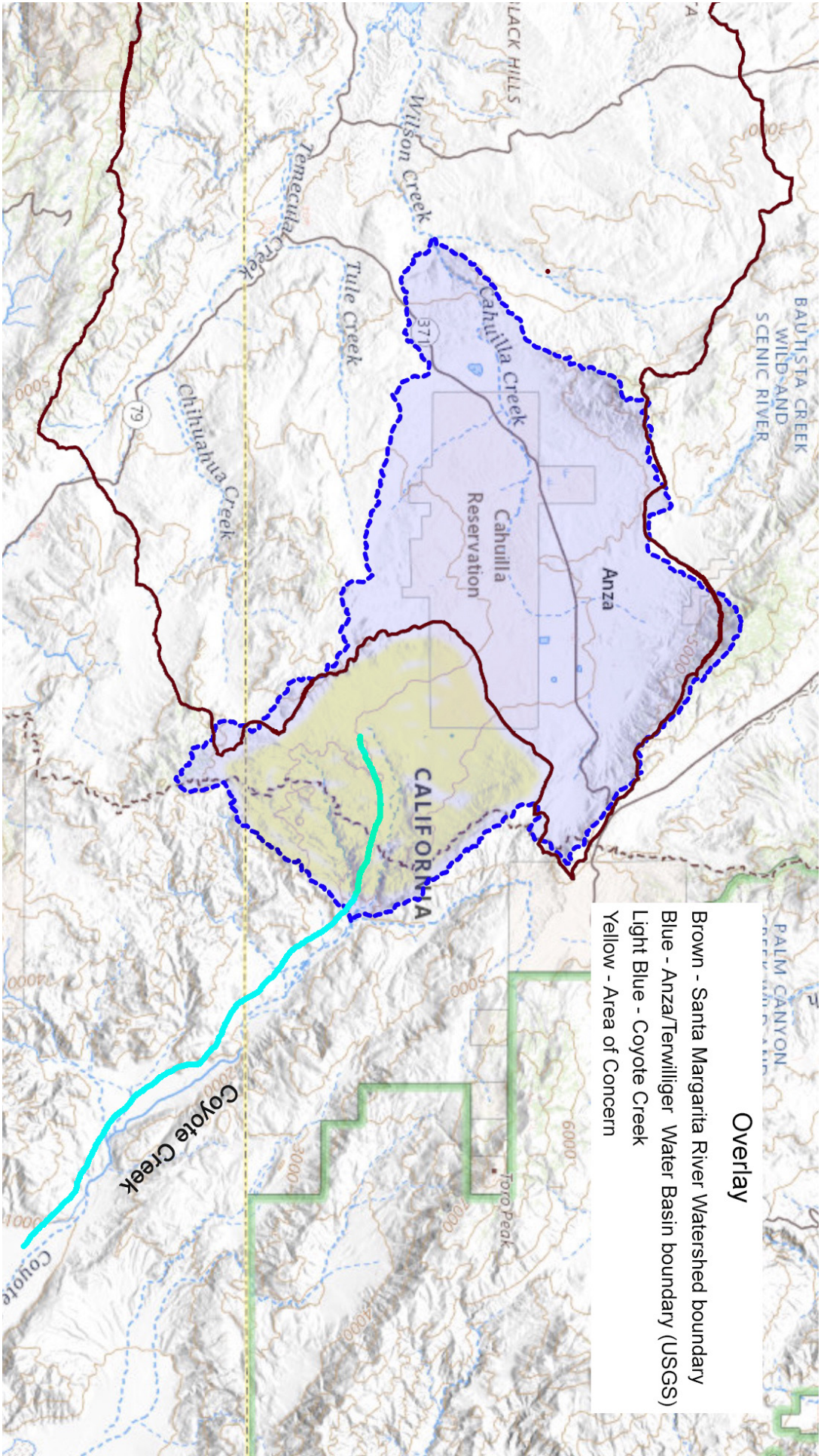
Industrial Hemp photos

# Borrego Valley Groundwater Conditions



Groundwater is effectively the sole source of water supply for Borrego Valley, California. By the mid-2000s, agriculture, recreation (predominantly golf courses), municipal uses, and the Anza-Borrego Desert State Park require four times more water than is available through natural recharge. As a result, the U.S. Geological Survey began a cooperative study of the Borrego Valley with the Borrego Water District (BWD) in 2009. The purpose of the study is to develop a greater understanding of the hydrogeology of the Borrego Valley Groundwater Basin and provide tools to help evaluate the potential hydrologic effects of future development.





## Timeline

2018

The Agriculture Improvement Act of 2018 (2018 Farm Bill) authorized the production of hemp and removed hemp and hemp seeds from the Drug Enforcement Administration's (DEA) schedule of Controlled Substances. It also directed the U.S. Department of Agriculture (USDA) to issue regulations and guidance to implement a program to create a consistent regulatory framework around production of hemp throughout the United States.

2019

As of April 30, 2019, the California Department of Food and Agriculture posted applications for registration for commercial hemp cultivation and hemp seed breeders.

2019

April 30, 2019

The Riverside County Agricultural Commissioner's Office accepting applications for Industrial Hemp Cultivation Registration.

2019

June 4, 2019

Riverside County Planning Dept asked to start work on a hemp ordinance

2020

June 3, 2020<sup>1</sup>

First Reading hemp ordinance by Planning Commission

2020

June 2020

154 Hemp permits issued in Riverside County with 34 to Anza Valley (no ordinance in place as yet)

2020

Aug 5, 2020 Second reading hemp ordinance by Planning Commission. Letters in opposition submitted including exclusion of Santa Margarita River Watershed. Commissioners vote to exclude hemp cultivation within SMRW and forward ordinance to BOS

2020

Sept 1, 2020

Revised ordinance going to RivCo Board of Supervisors Sept 15, 2020 with both indoor and outdoor hemp cultivation excluded in SMRW.

The issue of concern (YELLOW) (see map above) is the area outside the Santa Margarita River Watershed but within the bounds of the Anza-Terwilliger Water Basin as defined by the USGS. As per the Santa Margarita River Watershed this area as has not been quantified to the amount of water available for high water use industrial hemp operations. This area also is a source of aquifer recharge for not only the Terwilliger Valley on the eastern edge of the SMRW but as an important source for recharge for the Borrego Water Basin through Coyote Canyon on the southeastern edge of the Anza-Terwilliger Water Basin according to USGS studies. (SEE MAP).

The attached images show some of the industrial hemp operations within the area of concern.



Indoor Hemp Cultivation Anza Terwilliger Water Basin  
With yellow area of concern



Outdoor Hemp Cultivation Anza Terwilliger Water Basin  
With yellow area of concern





BORREGO WATER DISTRICT  
BOARD OF DIRECTORS MEETING  
SEPTEMBER 8, 2020  
AGENDA ITEM II.A

September 2, 2020

TO: Board of Directors

FROM: Geoffrey Poole, General Manager

SUBJECT: SDCWA Proposed Regional Conveyance System (RCS) through Borrego Spring.

**RECOMMENDED ACTION:**

Receive Update and direct staff accordingly

**ITEM EXPLANATION:**

The SDCWA Board has delayed action on the RCS until November, and in the meantime it will be holding a workshop with economists to go over the numbers. SDCWA staff has informed BWD it intends to reach out to us, Tubb Canyon and others during the 3 month period.

Staff would like to discuss with the Board its desire to conduct any analysis regarding BWD/BS impacts at this time.

**NEXT STEPS:**

Implement the Boards decision

**FISCAL IMPACT:**

TBD

**ATTACHMENTS:**

1. Recent Memo from SDCWA GM

August 26, 2020

MEMBER AGENCIES

Carlsbad  
Municipal Water District

City of Del Mar

City of Escondido

City of National City

City of Oceanside

City of Poway

City of San Diego

Fallbrook  
Public Utility District

Helix Water District

Lakeside Water District

Olivenhain  
Municipal Water District

Otay Water District

Padre Dam  
Municipal Water District

Camp Pendleton  
Marine Corps Base

Rainbow  
Municipal Water District

Ramona  
Municipal Water District

Rincon del Diablo  
Municipal Water District

San Dieguito Water District

Santa Fe Irrigation District

South Bay Irrigation District

Vallecitos Water District

Valley Center  
Municipal Water District

Vista Irrigation District

Yuima  
Municipal Water District

OTHER  
REPRESENTATIVE

County of San Diego

RE: Water Authority Regional Conveyance System (RCS) study and project

Dear Stakeholders:

Thank you for your August 24, 2020 letter regarding the Water Authority's Regional Conveyance System (RCS) study and project.

First, we certainly share your concern for San Diego County ratepayers; that is the main reason why the Water Authority Board of Directors is exploring the Regional Conveyance System study and project in the first place. It appears from your letter that you may not be aware of the \$12-18 billion in wheeling charges San Diego County ratepayers will pay to the Metropolitan Water District of Southern California (MWD) if it does not secure an alternative method of delivery for the conserved water we have secured via our contract with Imperial Irrigation District and by the lining of the All-American and Coachella Canals. This conserved water is among the most reliable and low-cost water in San Diego County's portfolio, which benefits all of our ratepayers.

Under the wheeling charges set by MWD, costs of the State Water Project are included, even if San Diego County takes zero water from the project—causing our wheeling charges to be artificially high and the cost of State Water Project water to those agencies that are using it to be artificially low (i.e., a subsidy). As you are undoubtedly aware, California law requires water agencies to reduce demand on Bay Delta supplies—for a recent commentary on this subject, see attached letter from NRDC to MWD dated August 25, 2020. The Water Authority Board of Directors has taken actions over the past more than two decades to diversify our water supply portfolio and decrease demand on the Bay Delta.

Similarly, the Water Authority strongly supports local water supply development such as you describe in your letter. While a detailed summary of our regional plan is beyond the scope of this letter, I invite you to review the Water Authority's Urban Water Management Plan at (<https://www.sdcwa.org/sites/default/files/UWMP2015.pdf>), which also accounts for the local water supply projects of our member agencies.

Returning to the RCS, the Water Authority retained two independent consultants to review the economic analysis in the engineering report prepared by DLM Engineering and Gillingham Water (DLM&G). Copies are available at these links:

- (1) <https://www.sdcwa.org/sites/default/files/Stratecon%20Review.pdf>; and
- (2) <https://www.sdcwa.org/sites/default/files/WRC%20Review.pdf>

The consultants raised significant questions about the DLM&G analysis, which we look forward to discussing with them and all interested parties. As stated in my cover Memo to the Board of Directors, the decision before the Water Authority Board of Directors at this time is not whether or not to approve the Regional Conveyance System Project—we are a very long way from that—

but rather, whether to continue to explore the feasibility of an alternative to paying MWD \$12-18 billion in “rent,” rather than invest in regional assets—especially given that all parties agree that the project is feasible and within the ballpark of identified costs.

Finally, you may rest assured in any case that no project will be developed that is not subject to full environmental review and opportunity to be heard. Thank you again for your letter and we look forward to your continued participation and engagement in the RCS Project.

Sincerely,



Sandra L. Kerl  
General Manager

Attachment: NRDC August 25, 2020 Letter to MWD on Integrated Resource Plan

cc: Water Authority Board of Directors  
Matt O’Malley, San Diego Coastkeeper  
Marco Gonzalez, Coastal Environmental Rights Foundation  
Dave Hogan, Sierra Club  
Marie Chen, SanDiego350  
Dan Silver, Endangered Habitats League  
Laura Hunter, Escondido Neighbors United  
Zachary Plopper, WILD COAST  
Chelsi Sparti, Samuel Lawrence Foundation  
Kyra Greene, Center on Policy Initiatives  
Diane Takvorian, Environmental Health Coalition  
Nicole Capretz, Climate Action Campaign  
Laura Walsh, The Surfrider Foundation San Diego Chapter  
Lydia Van Note, San Diego League of Conservation Voters  
Pam Heatherington, Environmental Center of San Diego  
Jim Peugh, San Diego Audubon Society  
David Garmon, Tubb Canyon Desert Conservancy  
Tara Hammond, Hammond Climate Solutions  
Duncan McFetridge, Cleveland National Forest Foundation Save Our Forests & Ranchlands  
Sam Mazzeo, Better  
Emma Jayne Harrison, Ph.D., Center for Interdisciplinary Environmental Justice  
Michael Torti, Business For Good  
Dr. Cindy Lin, Hey Social Good  
Connor Franklin Rey, Sunrise Movement San Diego  
Leslie Reynolds, Groundwork San Diego – Chollas Creek



August 25, 2020

Gloria Gray  
Chair, Board of Directors  
Metropolitan Water District of Southern California  
700 North Alameda Street  
Los Angeles, CA 90012-2944

**RE: Planning for Reduced State Water Project Supply in Metropolitan's 2020 Integrated Resources Plan**

Dear Chairwoman Gray and Members of the Board:

On behalf of the Natural Resources Defense Council, which has more than 3 million members and activists, more than 400,000 of whom are Californians, I am writing to provide input on the development of Metropolitan's Integrated Resources Plan ("IRP"). In particular, we strongly urge Metropolitan to ensure that the IRP anticipates and plans for a future with significantly less water imported from the Bay-Delta than today, and that the IRP uses this baseline to help the Board of Directors and Metropolitan's Member Agencies prioritize and plan for continued improvements in water use efficiency and significant additional investments in local and regional water supply projects, including through the Local Resources Program (LRP).

The IRP must plan for reductions in State Water Project deliveries from the Delta compared to today's levels, as a result of climate change and more protective environmental regulations. As the most recent drought demonstrated, climate change is already having a significant impact on water supply from the Bay-Delta and is likely to further reduce water supply from the Bay-Delta in the future, including as a result of changes in the amount, type and timing of precipitation; increased temperatures that increase evapotranspiration and decrease snowpack; and more frequent and more severe droughts. In addition, given the environmental crisis in the Bay-Delta estuary, various state and federal regulatory requirements are likely to result in State Water Project diversions from the Bay-Delta being significantly reduced from current levels in the near future, including the State Water Resources Control Board's adoption of the Bay-Delta Water Quality Control Plan, and increased protections for salmon, smelt and other endangered species (which are currently the subject of extensive litigation, including by NRDC). Taken together, reduced diversions from the Bay-Delta are necessary to prevent the extinction of native fish and wildlife, to protect thousands of fishing jobs, to reduce the frequency and severity of harmful algal blooms in the Delta, to maintain water quality for farms and cities, to respond to and mitigate the effects of climate change, and to comply with the Public Trust.

For instance, in July 2018 the State Water Resources Control Board issued its Framework for the Sacramento/Delta Update to the Bay-Delta Plan (“Framework”).<sup>1</sup> The Framework states that the State Water Resources Control Board’s staff report for the update of the Bay-Delta Water Quality Control Plan will propose a starting point of 55% of unimpaired flow for both Delta inflow and Delta outflow standards (within a range of 45-65%),<sup>2</sup> and the Framework estimates that this would reduce total diversions from the Bay-Delta watershed by 2 million acre feet per year.<sup>3</sup> While the Framework does not specifically identify the potential reduction in water diversions by the State Water Project or any other diverter, reduced diversions by the State Water Project are the foreseeable result of this proceeding.<sup>4</sup>

It is worth noting that MWD’s 2015 Urban Water Management Plan (“UWMP”) assumed that State Water Project supply in 2020 would be reduced compared to both historic and current levels of water diversions. The UWMP assumed that beginning in 2020, SWP total exports would average 976,000 acre feet per year, equivalent to a 51% State Water Project Allocation.<sup>5</sup> This was significantly lower than the State’s estimate of average State Water Project allocations in 2015, and it would be significantly lower than the State’s current estimate of the average State Water Project allocation. In 2015, Metropolitan refused to alter these planning assumptions despite NRDC’s public comments that the analysis used in the 2015 UWMP was a misleading attempt to justify the California WaterFix project.

There is simply no rational basis for the IRP to assume current or increased levels of water diversions and supply from the State Water Project, in either the near term or the longer term. In light of the range of possible outcomes in terms of how much Metropolitan’s water supply from the Delta is likely to be reduced, we encourage Metropolitan to evaluate a range of reductions in water supply from the State Water Project in the scenarios that are used to develop a final IRP.

Metropolitan can play a significant role in helping its Member Agencies sustain a growing economy in Southern California despite reductions in water imports from the Bay-Delta. Thanks in part to the leadership of Metropolitan’s Board of Directors and the actions of its Member Agencies over the past three decades, Southern California has significantly reduced per capita water use, reduced demand for imported water, reduced retail demand from Metropolitan, and diversified its sources of supply. As a result, in recent years Metropolitan has met retail demand for water with only a 35% allocation from the

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<sup>1</sup> Available online at:

[https://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/docs/sed/sac\\_delta\\_framework\\_070618%20.pdf](https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/docs/sed/sac_delta_framework_070618%20.pdf).

<sup>2</sup> *See id.* at 2.

<sup>3</sup> *See id.* at 13.

<sup>4</sup> This is also true for any Voluntary Agreements, which proponents claim would increase Delta outflow and reduce diversions from the Bay-Delta, including by the State Water Project and its contractors. Voluntary Agreement would be subject to review and consideration by the State Water Resources Control Board as part of the update of the Bay-Delta Water Quality Control Plan, after compliance with CEQA and other legal obligations.

<sup>5</sup> Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, at A.3-28.



State Water Project.<sup>6</sup> While a 35% State Water Project allocation is currently necessary in most years to meet retail demands within the Metropolitan service area, the current average State Water Project allocation is 62% according to the California Department of Water Resources.<sup>7</sup>

Yet even in light of the region's prior investments, Southern California's water agencies have demonstrated that there are huge opportunities to increase water use efficiency and increase water supply from sustainable local and regional projects, which can help offset the reduction in imported water from the Delta, as the Los Angeles Times editorial page recently opined ("For cities like Los Angeles, there's an emphasis on recycling as a backup to and a partial replacement for water currently imported from the north. That's as it should be.")<sup>8</sup> For instance, NRDC's 2017 *Mismatched* report compared the UWMPs of Metropolitan and its Member Agencies, and found that Metropolitan significantly overestimated per capita demand, underestimated local supply, and overestimated purchases of imported water.<sup>9</sup> Moreover, that analysis did not account for hundreds of thousands of acre feet of new water supply from potential local water supply projects that were still in development and were not included in the body of Metropolitan's UWMP. Many of those projects are now coming to fruition.

We also appreciate that Metropolitan has begun a process of comparing the UWMP's assumptions with actual supply and demand. Staff's initial reviews demonstrate that Metropolitan's 2015 IRP significantly overestimated total demand for water, per capita water use, local water supply, and retail M&I demand. Several recent academic studies have concluded that water agencies routinely overestimate urban demand for water, including a study coauthored by David Sunding<sup>10</sup> and another

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<sup>6</sup> See, e.g., Metropolitan Water District of Southern California, Water Surplus and Drought Management Update, February 11, 2020, available online at: <http://www.mwdh2o.com/WhoWeAre/Board/Board-Meeting/Board%20Archives/2020/02%20-%20Feb/Reports/02102020%20WPS%206b%20Report.pdf>; Metropolitan Water District of Southern California, Water Surplus and Drought Management Update, March 11, 2019, available online at: <http://www.mwdh2o.com/WhoWeAre/Board/Board-Meeting/Board%20Archives/2019/03-March/Reports/064881267.pdf>; Metropolitan Water District of Southern California, Water Surplus and Drought Management Update, April 9, 2018, available online at: <http://www.mwdh2o.com/WhoWeAre/Board/Board-Meeting/Board%20Archives/2018/04-April/Reports/064865909.pdf>.

<sup>7</sup> See California Department of Water Resources, The State Water Project Final Delivery Capability Report 2017, March 2018. We understand that the 2018 Addendum to the Coordinated Operations Agreement that DWR negotiated with the Trump Administration (which Metropolitan supported) caused the average State Water Project allocation to decline from 62% to 59% in the forthcoming State Water Project Final Delivery Capability Report 2019.

<sup>8</sup> Los Angeles Times, Editorial: *Gavin Newsom's plan for California water is a good one. Stay the course.* July 31, 2020. Available online at: <https://www.latimes.com/opinion/story/2020-07-31/newsom-water-portfolio>.

<sup>9</sup> This report is available online at: <https://www.nrdc.org/resources/comparison-2015-urban-water-management-plans-metropolitan-water-district-southern>

<sup>10</sup> Buck, Steven, Maximillian Auffhammer, Hilary Soldati, and David Sunding 2020. *Forecasting Residential Water Consumption in California: Rethinking Model Selection*. Water Resources Research,

study by the Pacific Institute.<sup>11</sup> We encourage Metropolitan to apply the lessons learned from the 2015 UWMP, particularly by strengthening its partnerships and processes with its Member Agencies to develop local water supply projects to fruition, and to reduce its forecasts of demand for retail water to more accurately budget for and assess demand.

Finally, after years of claiming that Metropolitan endorsed an “all of the above” approach<sup>12</sup> and would pay for local water supply projects, water conservation, the California WaterFix project, and other water projects, at last year’s Board retreat staff indicated that water supplies may exceed demand and Metropolitan may seek to reduce incentives for local and regional water supply projects and/or increase fixed charges, which threaten efforts by Member Agencies to reduce their retail demand on Metropolitan.<sup>13</sup> We are alarmed that Metropolitan would consider reducing funding for local water supply projects through the LRP, reduce funding for water use efficiency projects, and/or increase fixed charges to force Member Agencies to subsidize the costs of imported water that they do not use – particularly at the same time that Metropolitan is considering spending billions of dollars on unsustainable water projects outside of the region, like the Sites Reservoir project and Delta conveyance project, which do not create local jobs in Southern California and which threaten the environment.

Given the anticipated decline in State Water Project deliveries, we strongly urge Metropolitan not to reduce funding for LRP or create additional barriers to local water supply projects, such as increasing fixed charges. Rather, the IRP process should lead the Board of Directors to consider increasing the LRP target to account for reductions in State Water Project supplies and consider improved ways to facilitate the development of local water supply and water use efficiency projects.

NRDC strongly supports Southern California’s efforts to reduce reliance on the Delta by investing in sustainable local and regional water supply projects. Investments in local water efficiency, water recycling, stormwater capture, and other projects create good paying middle class jobs in Southern California, provide a more drought resistant water supply, improve the reliability of Southern California’s water supply (including providing far greater resilience to earthquakes and other natural

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56, e2018WR023965. <https://doi.org/10.1029/2018WR023965>.

<sup>11</sup> Available online at: <https://pacinst.org/wp-content/uploads/2020/08/Pacific-Institute-Assessment-Urban-Water-Demand-Forecasts-in-CA-Aug-2020.pdf>

<sup>12</sup> See, e.g., Metropolitan Water District of Southern California, California WaterFix Fact Sheet, “Why a California Water ‘Fix’?”, available online at:

[http://www.mwdh2o.com/DocSvcsPubs/DeltaConveyance/assets/cwf\\_fact\\_scb\\_6\\_25.pdf](http://www.mwdh2o.com/DocSvcsPubs/DeltaConveyance/assets/cwf_fact_scb_6_25.pdf); Jeffrey Kightlinger, “California WaterFix: How a Big Project Looks Smaller,” September 18, 2017, available online at: <http://mwdh2o.com/newsroom/H2outlook?t=1029>;

<sup>13</sup> See Metropolitan Water District of Southern California, Charting Metropolitan’s Second Century (Board Retreat 2019), October 2019, available online at:

<http://www.mwdh2o.com/WhoWeAre/Board/Board-Meeting/Board%20Archives/2019/10-Oct/Reports/10212019%20Board%20Retreat%20White%20Paper.pdf>; Metropolitan Water District of Southern California, Board Retreat: Charting Metropolitan’s Second Century, October 21, 2019, available online at: <http://www.mwdh2o.com/WhoWeAre/Board/Board-Meeting/Board%20Archives/2019/10-Oct/Presentations/October%202019%20MWD%20Retreat.pdf>.

*NRDC letter to Metropolitan regarding Integrated Resources Plan  
August 25, 2020*

disasters than projects in the Delta), and are consistent with the demonstrated scientific need to reduce diversions from the Bay-Delta watershed. Planning for reduced State Water Project deliveries from the Bay-Delta in the IRP will help Metropolitan's Board of Directors chart a new course to sustain Southern California's economy for the next several decades.

Thank you for consideration of our views. We would be happy to answer any questions or discuss these issues with the Board of Directors at your convenience.

Sincerely,

A handwritten signature in cursive script that reads "Doug Obegi".

Doug Obegi

BORREGO WATER DISTRICT  
BOARD OF DIRECTORS MEETING  
SEPTEMBER 8, 2020  
AGENDA ITEM II.B

September 2, 2020

TO: Board of Directors

FROM: Geoffrey Poole, General Manager

SUBJECT: Draft Response to County's Email from BWD Regarding Unknown Status of Wells in Subbasin – G Poole

**RECOMMENDED ACTION:**

Discuss Draft and Agree Upon Response

**ITEM EXPLANATION:**

BWD and The County have been communicating regarding a potential response and plan of action to identify and rectify improperly abandoned wells.

In summary, BWD requested the County survey property owners to inquire about the current status and need for destruction/abandonment to prevent the potential for damage to Basin water quality. The County explained if a “nuisance” has been identified it can require the Property Owner rectify the situation. A Draft Response has been developed and is attached.

**NEXT STEPS:**

Forward Response to County

**FISCAL IMPACT**

TBD

**ATTACHMENTS**

1. BWD Letter to County
1. Email from County to BWD
2. Draft BWD Response to County



# BORREGO WATER DISTRICT

August 12, 2020

To: SDCWA Board of Directors:

It has come to the attention of the Board of Directors of the Borrego Water District (BWD) that there is belief “Borrego is entirely behind the proposed SDCWA’s Regional Conveyance System to transfer water from the Imperial Irrigation District (IID) to San Diego.” The BWD Board understands further that the purported rationale for Borrego’s support for this project is the potential for storage of IID water in the Borrego Springs Subbasin, which is currently designated as *critically* overdrafted by the California Department of Water Resources (DWR). This is topic that has not yet been discussed in the community as a whole and no such support has been registered.

The BWD Board would like to make it perfectly clear to the SDCWA Board that it has neither the inclination nor information, at present, to support or to oppose SDCWA’s proposed Regional Conveyance System.

The proposed Regional Conveyance System as a solution to the Borrego Springs Subbasin’s *critical* overdraft situation and impact on municipal water rates is tenuous at best, as no economic study has been developed nor presented to the BWD for review.

Furthermore, storage and later withdrawals of IID water for SDCWA use (conjunctive use) in the Borrego Springs Subbasin is neither a given nor externalities-free. Much additional hydrological and economic study would necessarily be required before the BWD Board could support such a proposition.

One example of a major concern is that there are numerous toxins in Colorado River water, which are presently not found in Subbasin water deposits, and which are hard if not impossible to remove with common advanced treatment technologies. Some of these are known MCL contaminants, some are already being regulated in other US states and in countries other than the US, and some are presently being considered for future regulation here in California. Would BWD be willing to assume the additional financial risk of adding new contaminants to the Subbasin? This is a question for a future BWD Board to answer; hopefully with data, not opinion.

Another example is consideration for the structural integrity of the Subbasin; certain time and quantity conditions for storage and withdrawals of IID water could result in compaction and subsidence in Borrego. No amount of hydrological study can with 100% confidence render such an outcome



exceptionally unlikely (<1% probability). Such a claim would not be reliable science, but merely wishful thinking. Instead, any decision to use the Subbasin must be made based on a thorough understanding of the financial risk and rewards for municipal water service, and for the potential externalities that, if they occur, would potentially be borne by the Borrego community's public sector. Since Borrego is designated as a Severely Disadvantaged Community, the economic risks are a major concern.

In closing, while the BWD Board does not have the necessary information at this time to formally support or oppose the proposed pipeline alignment at this time, we would welcome gaining more scientific and economic data, including risks and benefits for further discussion with SDCWA in the future.

Sincerely,

For the BWD Board



Kathy Dice, President

p.p. Geoffrey Poole, General Manager

## COUNTY RESPONSE TO BWD

As discussed during our call, if the Department of Environmental Health is provided reasonable cause that a well in your district is a nuisance, as defined in County Ordinance, then we will proceed with actions to investigate and remedy the situation if warranted. The DEH does not have the regulatory oversight to survey property owners to identify current uses and conditions of water wells.

I have also discussed this with David Garmon, of the Borrego Revitalization Committee. The DEH does have the necessary enforcement tools to take action and we will certainly assist in your efforts to keep groundwater in the Borrego Valley safe.

Please let me know if you have any questions or need to speak further.

**Jamelle McCullough, MPH, REHS**  
Supervising Environmental Health Specialist  
County of San Diego | Department of Environmental Health

## DRAFT BWD RESPONSE

Thank you for your email of August\_\_\_\_\_,2020 (attached). Unfortunately, your email does not address issues regarding improperly abandoned wells in the Borrego Springs Subbasin of concern to the Borrego Water District (BWD) Board. Some questions:

1. Based on the science and California Department of Water Resources (DWR) experience, an improperly abandoned well itself should be considered a potential “nuisance” by the County. Is that the case? If not, why not?
2. When does an improperly abandoned well become a “nuisance” well in the County’s estimation? Only after pollution of groundwater has occurred? If, so that creates an expensive liability problem, as once pollution of groundwater occurs, if this affects a BWD production well, this could result in a \$1.5 million - \$2 million capital cost, far in excess of any property owner’s ability to pay;
3. You indicate in your email that a nuisance well must be reported for the County to take enforcement actions. BWD wishes to formally report two nuisance wells that we believe have been abandoned and have not been properly abandoned, thus are a potential public health nuisance. How shall we report them to you? What information do you require of us?
4. Please provide us with a schedule of your enforcement actions for these reported wells and let us know how we are to track progress on their proper abandonment to prevent groundwater contamination before it occurs;
5. The County approves wells in the Subbasin through a ministerial permitting process but takes no responsibility for these permitted wells once permitted until the well becomes a “nuisance.” But, when a well becomes a “nuisance” appears to assume after-the-fact enforcement. That is, it is unclear how to proactively identify improperly abandoned wells before they have damaged the aquifer or a small child dies by falling into an improperly capped abandoned well. Saying the County has no budget to track the \_\_\_\_\_ unknown status of wells in the Subbasin (BWD analysis attached), offers no solution to the underlying problem. Such a statement only pushes the problem to someone else and does not address the underlying liability issue if pollution of the aquifer occurs, and people get sick or die from drinking polluted groundwater or crops are damaged.

BORREGO WATER DISTRICT  
BOARD OF DIRECTORS MEETING  
SEPTEMBER 8, 2020  
AGENDA ITEM II.C

September 2, 2020

TO: Board of Directors  
FROM: Geoffrey Poole, General Manager  
SUBJECT: Replacement of Twin Tanks – D Dale

**RECOMMENDED ACTION:**

Receive Report from David Dale and Initiate Development of Bid Documents

**ITEM EXPLANATION:**

David Dale is wrapping his evaluation of the Twin Tanks and will present the justification for proceeding with replacement at this time. In summary, David is recommending initiating the process for replacement now, specifically authorization to develop Plans/Specifications and Bid Documents.

This Project is still part of a Grant Application in process with California Department of Water Resources. The Grant is a reimbursement style so regardless of the outcome BWD would need to spend the money first so there is no advantage to wait from the Grant perspective. Staff is still confident the Project will be funded by the Grant but nothing is for sure until the Grant is officially approved, which is expected in the next 60 days.

**NEXT STEPS:**

Initiate development of Bid Documents for T/T Replacement

**FISCAL IMPACT:**

TBD

**ATTACHMENTS:**

1. None: David will provide a verbal report including video of the inside of the Twin Tanks

BORREGO WATER DISTRICT  
BOARD OF DIRECTORS MEETING  
SEPTEMBER 8, 2020  
AGENDA ITEM II.D

September 2, 2020

TO: Board of Directors  
FROM: Geoffrey Poole, General Manager  
SUBJECT: Selection of Consultant to Upgrade SCADA/Telemetry System – D Dale

**RECOMMENDED ACTION:**

Receive staff report and authorize staff to enter into Contract for SCADA Upgrades

**ITEM EXPLANATION:**

SCADA/telemetry remotely monitors and operates various components of the water system such as reservoir levels and pump operations (on/off).. The system currently in use is not functional primarily due to the fact of its age which has created a situation where repair parts are no longer available. Staff recommends replacement of the complete BWD SCADA system and the Project was included in the BWD CIP. Initially this project was envisioned to be a 2 phase project over the next two years totaling \$100,000. Staff is now recommending combining the phases and proceeding with the recommended work.

David Dale and Alan Aasche have been working with 4 potential Consultants on this Project and received quotes from 4 respondents to replace BWD system The selected Consultant, Control Systems, has provided a quotation of \$88,417 for the following equipment/services.

- 1 New Access Point Transceiver
- 19 Remote Transceiver's
- Upgrade Main Twido PLC#1, including programming
- Update existing Wonderware application to work with new PLC and Remote IO modules addressing
- Upgrade 5 reservoir site radio enclosures to include a metal sunshade and remounted antenna
- Upgrade Omni antennas to Yagi Style where needed for signal optimization (4 sites in bid)
- Develop a control strategy, drawings, and O&M books
- All labor and material for a complete and functional system

**NEXT STEPS:**

Sign contracts and begin installation of new equipment

**FISCAL IMPACT**

\$88,814

**ATTACHMENTS**

1. None. For security reasons, Staff would prefer not to disclose all of the details of the System and our New Plan/Design. David Dale will provide a verbal report at the meeting and answer questions.

BORREGO WATER DISTRICT  
BOARD OF DIRECTORS MEETING  
SEPTEMBER 8, 2020  
AGENDA ITEM II.E

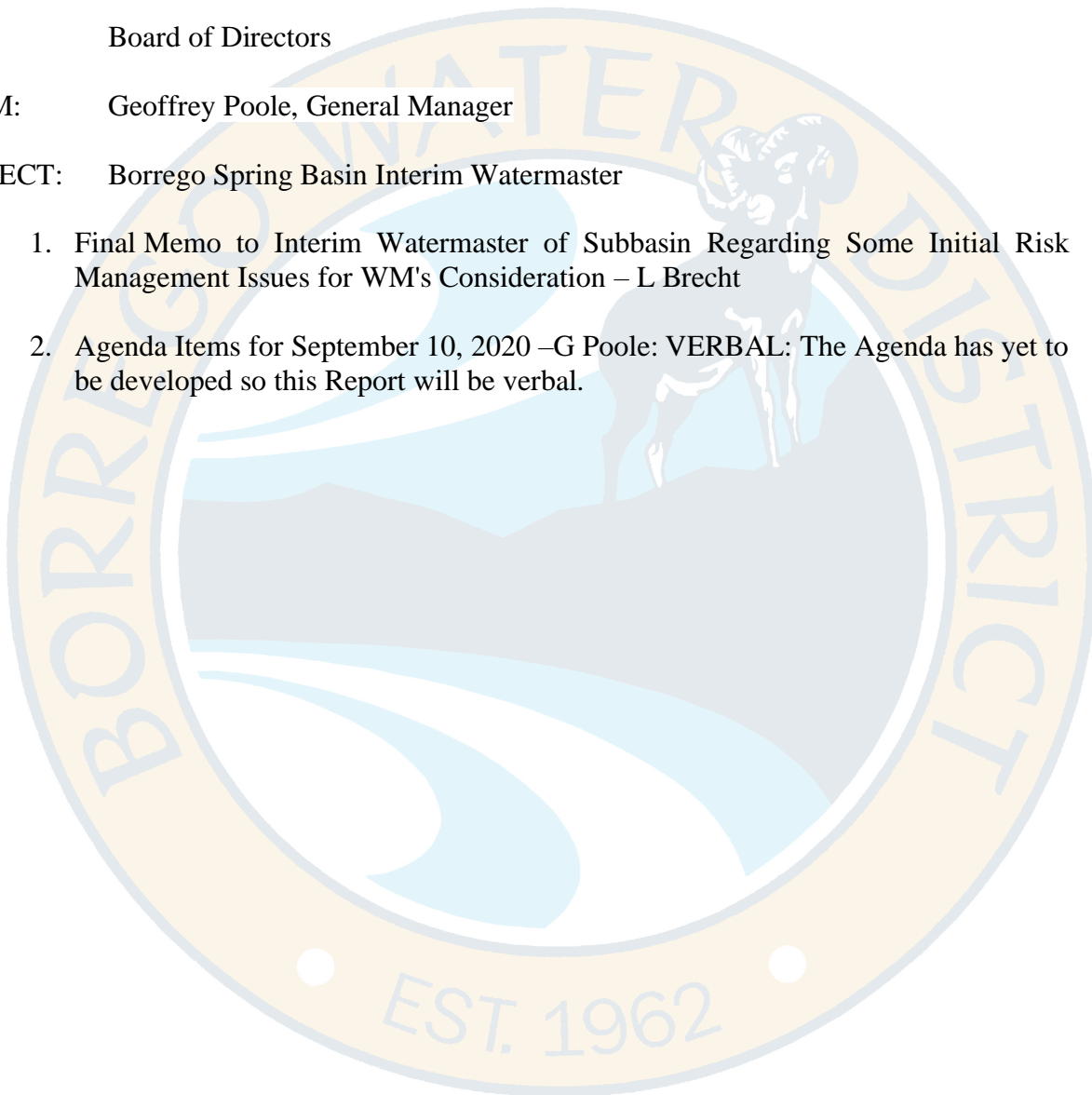
September 2, 2020

TO: Board of Directors

FROM: Geoffrey Poole, General Manager

SUBJECT: Borrego Spring Basin Interim Watermaster

1. Final Memo to Interim Watermaster of Subbasin Regarding Some Initial Risk Management Issues for WM's Consideration – L Brecht
2. Agenda Items for September 10, 2020 –G Poole: VERBAL: The Agenda has yet to be developed so this Report will be verbal.





**BORREGO WATER DISTRICT (BWD) RISK MANAGEMENT ISSUES  
FOR WATERMASTER CONSIDERATION & ACTION**

To: Borrego Springs Subbasin Interim Watermaster Board of Directors

From: Borrego Water District Board of Directors

Date: August 26, 2020

Re: Present and Future Agenda Items for Consideration by Watermaster Board

In addition to pumping controls, the Borrego Springs Subbasin (Basin) Watermaster will need to adequately manage groundwater quality within the Basin to attain “no undesirable results” for compliance under the requirements of the Sustainable Groundwater Management Act (SGMA). BWD’s concern is that certain discrete events that can affect water quality, if/when they may occur are not amenable to adaptive management processes. That is because they may represent “tipping points” of material changes in the groundwater system that are effectively irreversible. Instead, proactive risk reduction strategies are likely more useful.

A major reason BWD wishes to discuss these issues with the Watermaster at this time is that the BWD is presently engaged in a Proposition 218 Cost of Service rate setting study. Currently, water treatment is not necessary due to generally good water quality in the Basin. However, if advanced water treatment does become necessary for Basin groundwater, this would be a potentially overwhelming cost for BWD’s municipal customers to bear.<sup>1</sup>

For BWD, risk management is an important aspect for assuring its future financial stability and affordable water rates. Inadequate coverage of the Basin by water quality monitoring wells, lax testing standards, and/or infrequent water quality monitoring would risk unexpected multimillion dollar capital costs associated with BWD’s production wells. Given the public health responsibilities of BWD to assure continuance of potable water service to its municipal customers, these groundwater quality management issues are of critical importance to BWD and to the wider Borrego community. Water quality must also be considered an issue of concern

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<sup>1</sup> The estimated cost of basin-wide water quality degradation requiring BWD to implement advanced treatment for its municipal water system is approximately \$40 million (capital & operating costs during the 30-year economically useful life of the advanced treatment system). See Dudek, “Water Replacement and Treatment Cost Analysis for the Borrego Valley Groundwater Basin” (November 24, 2015).

**BORREGO WATER DISTRICT (BWD) RISK MANAGEMENT ISSUES  
FOR WATERMASTER CONSIDERATION & ACTION**

to the Watermaster as it attempts to meet SGMA requirements. Some important issues at this time are:

1) Improperly Abandoned Wells

Presently, San Diego County asserts its authority over wells in the Basin. The County has an ordinance regarding the proper abandonment of unused wells. However, the County takes no responsibility for enforcing this ordinance until someone reports a violation. Effectively, there is uneven or only after-the-fact enforcement. Thus, there presently exists a disconnect between authority and responsibility. Each improperly abandoned well in the Basin is like a ticking time bomb that may or may not go off in any specific time period. An improperly abandoned well can potentially cause only minimal property damage or widespread, consequential damage to groundwater quality in the Basin.

Improperly abandoned wells are a public health nuisance. Arguments that because well-related aquifer contamination has not occurred in past time periods, damage to the aquifer will not occur in future time periods is a false, pernicious narrative (*availability fallacy*). Therefore, it is imperative to the safety and well-being of the Borrego community that special care is given to locate, then properly seal or destroy abandoned water wells. When groundwater becomes contaminated, it is often difficult or in some cases impossible to clean up. Groundwater contamination is often an expensive problem, especially for municipal water customers.

BWD requests the Watermaster pursue conversations with the County as to how responsibility for enforcement of improperly abandoned wells will be implemented in practice. BWD believes the Basin cannot be properly managed without effective enforcement of improperly abandoned wells. For example, one could easily imagine a situation where the Basin is brought into sustainable use by 2040, but the groundwater has been polluted and the economic affordability for both irrigation and municipal water users is damaged irreversibly. Hopefully, proactive action to address this situation will occur before the Basin is damaged, massive amounts of capital are required for relocation of BWD production wells to avoid contamination of the municipal water supply, and/or the public's health is compromised.

2) Conjunctive Use of Basin to Store Colorado River Water

Presently, under the terms of the proposed Stipulated Judgment, the use of the Basin's potential storage capacity is under the authority of the Watermaster. However, storage that adversely alters the water chemistry of the groundwater in the Basin is likely to primarily

**BORREGO WATER DISTRICT (BWD) RISK MANAGEMENT ISSUES  
FOR WATERMASTER CONSIDERATION & ACTION**

impact the finances of BWD and municipal customers' future rates. Thus, there exists a disconnect between authority and financial responsibility, as well as potential liability.

To date, when these storage issues have been brought up in public forums, BWD has been told by some "Not to worry," or "This is too far in the future to be concerned with."

Unfortunately, all this has been said before to folks years ago in the groundwater-dependent city of Tucson, Arizona. Adding a new water supply to an existing system can have unexpected and adverse water quality and infrastructure impacts, for example, as Tucson experienced when it added Colorado River water to its groundwater supply distribution system in the 1990s. The water chemistry was very different and the imported water caused minerals in the distribution system to be mobilized causing discolored (brown) water, stained clothing, etc.<sup>2</sup>

BWD requests that the Watermaster adopt a policy that acknowledges that a water quality analysis, including assessing the two water sources and their combined water chemistries, and how this mixed water chemistry affects Borrego's groundwater supply and existing municipal infrastructure must be conducted by an independent technical advisor to the Watermaster before any decision is made by the Watermaster on use of the Subbasin to store or use Colorado River Water.<sup>3</sup>

3) Quality Assurance of Accuracy & Completeness of Basin Groundwater Monitoring Data

BWD requests that the Watermaster assure data accuracy and completeness of groundwater monitoring data by considering and adopting the following quality assurance policies and practices:

- Wildermuth Environmental, Inc. (WEI), the Executive Director of the WMB, should be required to provide detailed information regarding all calculations performed using HydroDaVE. For instance, if WEI uses this program to calculate the annual change in Basin storage, BWD would need this information to confirm WEI's results;
- For quality assurance reasons, the Watermaster should require telemetry metering platforms to store all of the data locally or have a meter that can be read manually (telemetry systems can "drift" or become inaccurate over time). The Watermaster

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<sup>2</sup> See: <https://www.csmonitor.com/1994/0524/24031.html>

<sup>3</sup> Much of the Basin has pretty good water (TDS <500 mg/L). Colorado River water, even after treatment, can a) have a higher TDS and b) chemically react with groundwater and cause minerals to be released from water distribution lines. Conversely, storage of imported water in areas like the Borrego Sink could degrade any imported water and place added demand on good water quality of the groundwater in other areas of the Basin, such as those areas that support BWD's municipal water supply.

**BORREGO WATER DISTRICT (BWD) RISK MANAGEMENT ISSUES  
FOR WATERMASTER CONSIDERATION & ACTION**

should further assure that manual reads prevail over any faulty remote readings, should they occur;

- For additional quality assurance, the Watermaster should consider requiring that telemetry meters be read manually at least semi-annually to verify that the data being collected via telemetry is reliable. Also, knowing which telemetry technology is being used to perform the remote reads is required to avoid known technical difficulties that impact accuracy that have been experienced with several telemetry platforms;
- For data assurance reasons, the Watermaster should consider requiring WEI to use HydroDaVE to store data on the approximate acreage irrigated by each well and crop type so that the Watermaster can more easily determine whether the reported water use is reasonable, as well as to evaluate water use efficiency;
- BWD did not perform the Spring 2020 Subbasin water quality monitoring due to lack of funding. However, Dudek and DWR did complete the Spring 2020 water level monitoring. BWD recommends the Watermaster adopt the Sampling and Analysis Plan prepared under the GSP to conduct groundwater level and water quality monitoring for data collection this fall. This monitoring should be completed by no later than October 2020 to avoid further data gaps in water quality monitoring.

4) Timeliness and Sharing of Basin Groundwater Monitoring Data

The Watermaster should be aware that the court's reporting requirements under the Stipulated Judgment may not begin to address the economic risk management requirements of either BWD and some other pumpers of the Basin. Also, the format and timeliness of reported Basin monitoring data is a potential salient issue.

For example, BWD presently uses an open source database management system (DMS; a \$50K investment). The Watermaster has chosen to use a proprietary system, HydroDaVE, for its data. For regulatory and risk management reasons, BWD needs to continue to update the DMS with production, water level, and water quality data. This data is especially important and timely to BWD, as BWD may need 3-4-years advance analysis to determine if specific municipal production wells may require redrilling, removal from production, or replacement due to basin water level or water quality trends. Since BWD decisions on production wells may be as much as a \$2 million capital cost, this analysis of the data must be performed by the BWD district engineer and/or BWD independent consultants.

BWD requests that the Watermaster direct WEI, on timely basis, to develop a data file format that can directly export data from HydroDaVE to BWD's DMS, as needed by BWD.

BORREGO WATER DISTRICT  
BOARD OF DIRECTORS MEETING  
SEPTEMBER 8, 2020  
STAFF REPORTS

September 2, 2020

TO: Board of Directors  
FROM: Geoffrey Poole, General Manager  
SUBJECT: Staff Reports

A. Water Sales and Revenues Verbal Update: J. Clabaugh latest revenue and collection information to be presented.

- B. Publication of Documents – G Poole
1. T2 attorney's suggested letter to SDCWA re: RCS
  2. BWD Final Draft Letter to SDCWA re: RCS

Attached is a Draft Letter suggested by T2 and BWDs Final Draft that was sent to SDCWA

C. Tentative Schedule with Fieldman Rolapp Associates (FRA) and Raftelis Financial concerning CIP financing plan, Cost of Service Study, and Developer's Policy charges. – G Poole

Below is an updated schedule for completion of the Developers' Policy, Cost of Service Study and Financing Plan.

New Developers' Policy has been reviewed by County staff as requested and is now ready for BWD action. The item is planned for the Sept 22<sup>nd</sup> meeting

Cost of Service Study

<b>Task</b>	<b>Completion Date</b>
Model updates	September/October
Rate Design	October/November
Capacity Fee Design	November/December
Board Rate Workshop/Presentation	December /January
Draft Report	January/February
218 Notice to Customers	Before March 1, 2021
Public Hearing	April 15, 2021
Rate Implementation	July 1, 2021

## Financing Plan

### BORREGO WATER DISTRICT PHASE ONE FINANCIAL PLANNING SCHEDULE / MILESTONES

	DATE	DESCRIPTION
	Tuesday, July 14, 2020	BOARD APPROVAL OF FRA CONTRACT
Week of	<u>Monday, September 7, 2020</u>	REVIEW ANNUAL OPERATION AND CAPITAL FUNDING NEEDS FROM DISTRICT
Week of	<u>Monday, October 5, 2020</u>	DETERMINE CAPITAL FUNDING OPTIONS AND ALTERNATIVE FINANCING OPTIONS
Week of	<u>Monday, October 19, 2020</u>	PROVIDE RECOMMENDATION FOR FUNDING STRATEGY
+/-	<u>Tuesday, November 10, 2020</u>	PROVIDE FUNDING STRATEGY RECOMMENDATION TO BOARD
Week of	<u>Tuesday, November 17, 2020</u>	REVIEW RAFTELIS COS MODEL

#### D. BWD Website Update – M Panchal - VERBAL

The BWD website has now been upgraded. Esme and Meet continue to add information.