ADMINISTRATIVE DRAFT

WATER SUPPLY ASSESSMENT FOR THE RAMS HILL SPECIFIC PLAN AREA AMENDMENT

Borrego Springs, California

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ACRONYMS AND ABBREVIATIONS

AF	acre-feet
AFY	acre-feet per year
APN	assessor's parcel number
BPA	Baseline Pumping Allocation
BWD	Borrego Water District
BVHM	Borrego Valley Hydrologic Model
CWC	California Water Code
CEQA	California Environmental Quality Act
DWR	California Department of Water Resources
EDU	equivalent dwelling unit
FY	Fiscal Year
GMP	Groundwater Management Plan for the Borrego Springs Subbasin
GSA	Borrego Valley Groundwater Sustainability Agency (dissolved June 16, 2021)
GSP	Groundwater Sustainability Plan
Judgment	Borrego Water District v. All Persons Who Claim a Right To Extract Groundwater in the Borrego Valley Groundwater Subbasin No. 7.024 Whether Based on Appropriation, Overlying Right, or Other Basis of Right, and/or Who Claim a Right to Use of Storage Space in the Subbasin; et al. (Case No. 37-2020-00005776). Honorable Judge Peter Wilson of the CA Superior Court for the County of Orange granted the motion for entry of the Judgment on April 8, 2021
LAFCO	San Diego County Local Agency Formation Commission
Project	Rams Hill Specific Plan Area Amendment Project
SB	Senate Bill
SGMA	Sustainable Groundwater Management Act
SWP	State Water Project
T2 Borrego	T2 Borrego, LLC
UWMP	Urban Water Management Plan
WY	Water Year
WSA	Water Supply Assessment
WSV	Water Supply Verification
Watermaster	Borrego Springs Watermaster

Commented [1]: Since the Watermaster is the functional GSA, should this be defined here or elsewhere?

Commented [2R1]: See revision here and additional detail added in Section 4.0.

1.0 Purpose

The purpose of this Water Supply Assessment (WSA) is to prepare an analysis complying with the requirements of Senate Bill (SB) 610 (Water code, sections 10910 et seq.) for the Rams Hill Specific Plan Area Amendment Project ("Project").

1.1 Introduction

SB 610 became effective on January 1, 2002, amending the California Water Code (CWC) by requiring detailed analysis of water supply availability for certain types of development projects. The primary purpose of SB 610 is to improve the linkage between water and land use planning by ensuring greater communication between water providers and local planning agencies and ensuring that land use decisions for certain large development projects are fully informed as to whether sufficient water supplies are available to meet project demands. SB 610 requires the preparation of a WSA for any project that is subject to the California Environmental Quality Act (CEQA) and meets certain requirements. A WSA that is associated with a project must include a discussion of the availability of an identified water supply under normal-year, single-dry-year, and multiple-dry-year conditions over a 20-year projection, accounting for the projected water demand of the project in addition to other existing and planned future uses of the identified water supply.

The Project is located within the water service area of the Borrego Water District (BWD), as documented by the San Diego County Local Agency Formation Commission (LAFCO), and BWD is the sole water agency authorized by CWC Section 34000 et seq. to provide water supply in Borrego Springs, California (**Figure 1**). BWD also received a request from T2 Borrego LLC (T2 Borrego) for the Rams Hill Specific Plan Area Amendment Project to provide a 399 Will Serve Letter, and BWD has previously responded to that request on October 7, 2024 (Attachment A). In addition, the County of San Diego provided a letter request on January 29, 2025 to the BWD to perform the WSA (Attachment B).

T2 Borrego is a party to the groundwater rights "Judgment" discussed in Section 6. T2 Borrego will be required to reach agreement with BWD on issues related to the Project and convey sufficient "Baseline Pumping Allocation" (BPA), as that term as described in the Judgment, over time to BWD to allow BWD to provide municipal water service to the Project. BWD would also be able to provide irrigation water to the Project on an annual basis should T2 Borrego convey sufficient water rights to BWD (whether annually or by way of BPA) to allow for irrigation water service to the Project, should T2 Borrego request such service from BWD in the future.

Commented [3]: Since the irrigation supplies would be interruptible, annual allocation may be transferred to support pumping.

Commented [4R3]: Goof with revision. Legal to confirm.

Commented [5R3]: The issue with providing annual allocation to meet irrigation demand is that the WSA analysis (Water Code, section 10910(c)(3) requires BWD to assess whether BWD's "total projected water supplies during [various year types] during a 20-year projection will meet the projected water demand associated with the proposed project." BWD cannot meet this threshold unless BPA is transferred to meet irrigation demand—annual allocation does not allow BWD to make the 20-year finding.

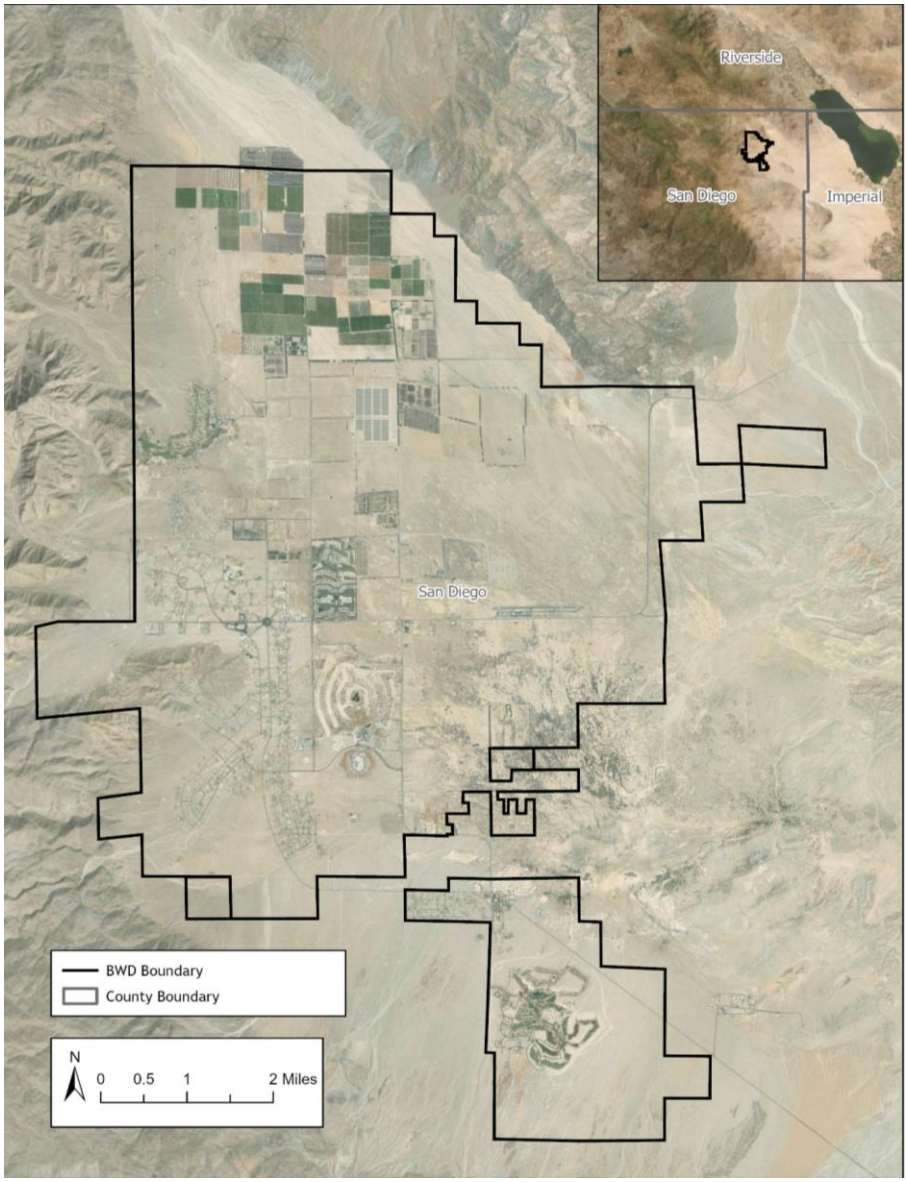

Figure 1. BWD Service Area

This WSA provides information on the Project's and BWD's projected water demands and projected available water supplies. The WSA provides data to support the sufficiency of water supply for the Project over the 30-year period of the Project. This WSA also includes a discussion of the relevant provisions of the Water Code; an overview of the Project; an analysis of water demands for the existing BWD service area and the Project over a 30-year planning period[1]; an analysis of the reliability of the potential Project water supplies; and concludes with a sufficiency analysis of water supply during normal, single dry, and multiple dry years over a 30-year planning period.

Commented [6]: While this is certainly the code requirement, the development agreement contemplated with the project provides for a 30 year period. While the conclusions in the WSA over 20 years are appropriate, perhaps we should discuss with the County separately extending those conclusions to 30 years.

Commented [7R6]: I believe this is a good idea as other project have been legally challenged as they do not cover the entire project period. Legal to confirm.

Commented [8]: Trey, wouldn't Intera need to do more analysis if this is extended to 30 years rather than 20?

1.2 Water Supply Assessment Applicability

1.2.1 SB 610 – Water Supply Planning

SB 610 amended California Water Code (CWC) Sections 10910 and 10912 to create a direct relationship between water supply and land use planning. SB 610 establishes the legal framework for assessing the sufficiency of water supply for new developments which qualify as defined "Projects." Per CWC Section 10912(a), a "Project" means any of the following:

- Proposed residential development of more than 500 dwelling units.
- Proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- Proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- Proposed hotel or motel or both, having more than 500 rooms.
- Proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
- Proposed mixed-use projects that include one or more of the above components.
- Proposed projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project. (Water Code Section 10912(a).)

The Rams Hill Specific Plan Area Amendment Project qualifies as a "Project" per CWC Section 10912(a) because more than 500 residential dwelling units are being constructed.

The Rams Hill Specific Plan Area Amendment Project also qualifies as a "Project" per CWC Section 10912(b) because the BWD has fewer than 5,000 connections and the Project will account for an increase the number of service connections by at least 10%.

This WSA addresses the following general questions:

- Is there a public water system that will serve the Project?
- Is there a current Urban Water Management Plan (UWMP) that accounts for the Project demand?

[1] SB 610 requires analysis of a minimum 20-year planning period. This WSA uses a 30-year planning period to align with the planning period used by the County to evaluate the projects under the California Environmental Quality Act.

- Is groundwater a component of the supplies for the Project?
- Are there sufficient supplies to serve the Project over the next 20 years?

The purpose of the WSA is to demonstrate compliance with the requirements of SB 610, Water Code sections 10910-10915, and the California Department of Water Resources (DWR) Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001 to assist water suppliers, cities, and counties in integrating water and land use planning concerning the water demand of a proposed project and to answer the following basic question (DWR 2023):

> *Will the public water system's total projected water supplies available during normal, single-dry, and multiple-dry water years during a 20-year projection meet the projected water demand of the proposed Project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing uses (Water Code, Section 10910(c)(3))?*

The response to this question also informs and assists the lead agency in responding to whether the project can be adequately served by all required utilities and public services, including water, and whether the project requires or results in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.

1.2.2 Public Water Systems and/or Local Water Agencies Service Areas

The Project lies within BWD's service area. BWD maintains approximately 2,060 potable water connections and is not currently considered a "public water system" under the CWC because it has less than 3,000 connections (BWD 2025a; CWC Section 10912). At full build-out, the Project will add more than 1,000 service connections to BWD's water delivery infrastructure, requiring BWD to maintain service for more than 3,000 service connections.

Under SB 610, upon a proper request by the applicable land use agency, WSAs must be prepared and furnished to cities or counties by the water utility serving the subject community for inclusion in any environmental documentation for projects meeting the specified requirements under Section 10912(a) of the CWC and that are also subject to CEQA. According to CWC Section 10910 (g)(1), "the governing body of each public water system, or the city or county, if either is required to comply with this act, shall approve the assessment prepared pursuant to this section at a regular or special meeting." Further, the public water system serving the project area is required to prepare the WSA. Because BWD is anticipated to serve more than 3,000 connections at full Project build out, BWD has determined to comply with the request from the County of San Diego to prepare the WSA even though BWD does not currently qualify as a public water system under Water Code, Section 10912(c).

This WSA evaluates the sufficiency and availability of water to serve the Project, assuming that the primary source of water is the public water supplier, and the Project is located within BWD. This WSA meets the requirements of SB 610 along with companion measure SB 221. Under SB 221, approval by a city or county of residential subdivisions of 500 dwelling units or more will also require one or more written verifications of sufficient water supply from the water supplier. The water supply verifications (WSV) will be prepared prior to the adoption of the final subdivision maps and ensure that sufficient

water supply is available to serve each new mapped area before construction begins (Government Code, Section 66473.7).

1.2.3 Urban Water Management Plan Coverage

UWMPs are prepared by California's urban water suppliers to support long-term resource planning and ensure adequate water supplies. UWMPs must be updated and submitted to the DWR every 5 years for review and approval. DWR has identified the UWMP as a foundational document in the preparation of a water supply evaluation, noting that a thorough UWMP can provide the required information to fulfill the standards set forth by SB 610. Every urban water supplier that either delivers more than 3,000 acre-feet of water annually or serves more than 3,000 connections is required to assess the reliability of its water sources over 20 years under normal, single dry, and multiple dry year scenarios; these are the same requirements of a water supply assessment, as specified by SB 610. A water supply evaluation may also rely on additional water supply data beyond the information in the UWMP.

To date, BWD has not been required to prepare a UWMP because it does not currently qualify as an urban water supplier.

1.2.4 Groundwater as a Component of Project Supplies

Groundwater is the sole source of water supply for the Project. Recycled water is not contemplated as part of this WSA. The project's specific plan contemplates the use of reclaimed water from the Rams Hill Waste Water Treatment Facility; however, since this source of supply is not available today it has been excluded as a water source. Groundwater is pumped from the Borrego Springs Groundwater Subbasin (herein referred to as "Basin"; DWR Basin Number 7-024.01), which is described in detail in Section 6.3 and shown in **Figure 2**. Water supply availability is discussed in Sections 6 and 7.

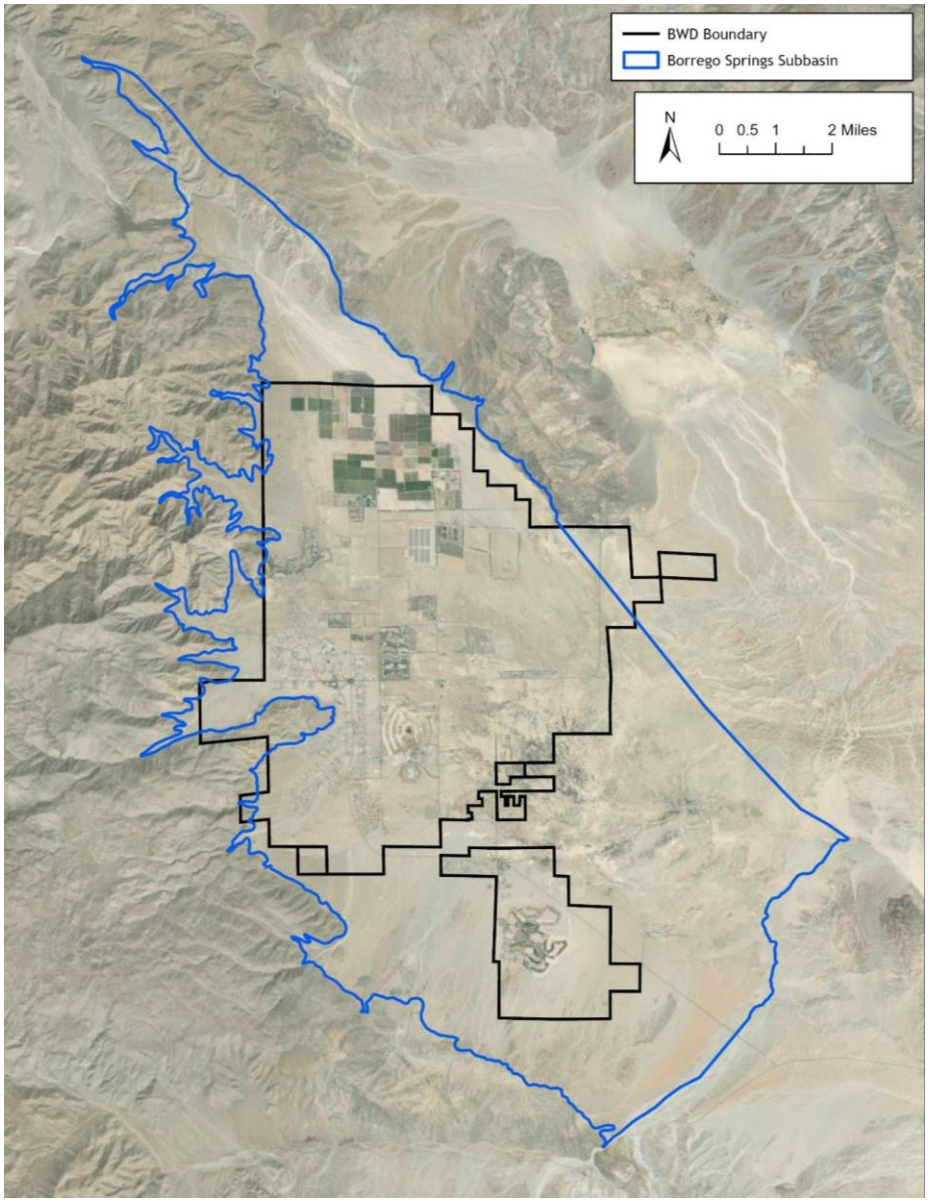

Figure 2. Borrego Springs Groundwater Subbasin

2.0 Project Description

The Rams Hill Specific Plan Area Amendment Project (Project) is part of the larger Rams Hill Specific Plan (Specific Plan), which was first approved by the County of San Diego Board of Supervisors in 1980 and was last amended in 1986. The Specific Plan allows for the development of the 3,140-acre site and includes 1,570 dwelling units, approximately 29 acres designated for commercial uses, a 350-room hotel complex, tennis facilities, a medical clinic, a fire station, a wastewater treatment plant, 1,832 acres of open space. The Project proposes to construct the planned dwelling units at a near-constant rate of approximately 24 units per year between 2025 and 2070 and a total of 720 units during the 30-year planning period.

The 1986 Rams Hill Specific Plan Area Designated Land Uses can be found in **Table 1**, and the Major use permits for the plan area are listed in **Table 2** (County of San Diego 2019).

Commented [9]: The workforce housing initiative is not a part of the project, but we believe it best to be included in the study as projected growth outside of the project. Since the WSA does not cover the planning horizon to 2070, should we make this reference consistent with the planning period?

Commented [10]: Doesn't the BWD analysis need to change if the unit load is increased from 480 to 720 units?

Table 1. 1986 Rams Hill Specific Plan Area Designated Land Uses

Land Use	Designated Acreage	Implemented/ Built*
Wastewater Treatment Plant	16.67	Yes
Fire Station	3.00	No
Medical Clinic	12.78	Yes
Resort Hotel	16.40	No
Country Club Site	4.09	Yes
Golf Pavilion Site	4.48	No
Tennis Center	9.48	Yes
1,570 Dwelling Units	550.28	264 units built
Golf Courses	346.37	Yes
Commercial Area	29.10	No
Public Roads	3.00	Partial
Open Space	1,832.16	Yes
Future Planning Area	312.64	-

Source: County of San Diego 2019
Note: * as of March 2025

Table 2. Rams Hill Specific Plan Area Existing Major Use Permits

Land Use	Implemented/ Built*
North Golf Course	Yes
South Golf Course	Yes
San Felipe Recreation Center	Yes
Wastewater Treatment Plant	Yes
Casitas Planned Development[a]	Yes
Santa Fe-Carrizos Planned Development[b]	No
Santa Rosa Planned Development	Yes

Source: County of San Diego 2019
Note: * as of January 2025
[a] Casitas are partially built. Unit 4 is mapped and partially built; the remaining area is undeveloped.
[b] Santa Fe-Carrizos infrastructure and lots are complete, but only a few houses have been built.

Commented [11]: Are we sure both golf courses were built? I thought it was only one so far.

Commented [12R11]: This comes from the County Report, which is cited at the bottom of the table.

Commented [13R11]: Yes, see added footnote that clarifies difference between the original 27-hole layout and the current 18-hole layout.

Commented [14]: Casitas are partially built. Unit 4 is mapped and partially built, remaining area is undeveloped. For this purpose, yes may be the right answer.

Commented [15R14]: See footnotes to table.

Commented [16]: Carrizos infrastructure and lots are complete, but only a few houses have been built.

Commented [17R16]: See footnotes to table.

The *Rams Hill Development Agreement Threshold Decision Director's Preliminary Report and Recommendation*, developed by the San Diego County Planning and Development Services department on November 21, 2019, notes that 264 dwelling units had been constructed, along with two golf courses[2], the tennis facility, the medical clinic, and the wastewater treatment plant (County of San Diego, 2019). In addition to the 264 constructed residential dwelling units, 236 empty lots have been constructed which will remain unchanged by the Project.

The existing Project condition is shown in **Figure 3** and the proposed Project condition per the Rams Hill Development Agreement Threshold Decision Director's Preliminary Report and Recommendation is shown in **Figure 4**.

[2] The original Rams Hill golf course was designed by Ted Robinson in 1983 with a 27-hole layout. In 2007, Tom Fazio redesigned the course to its current 18-hole configuration. The original golf course was approved in 1983 and a second 18-hole course was approved in 1986.

Figure 3. Project Existing Condition

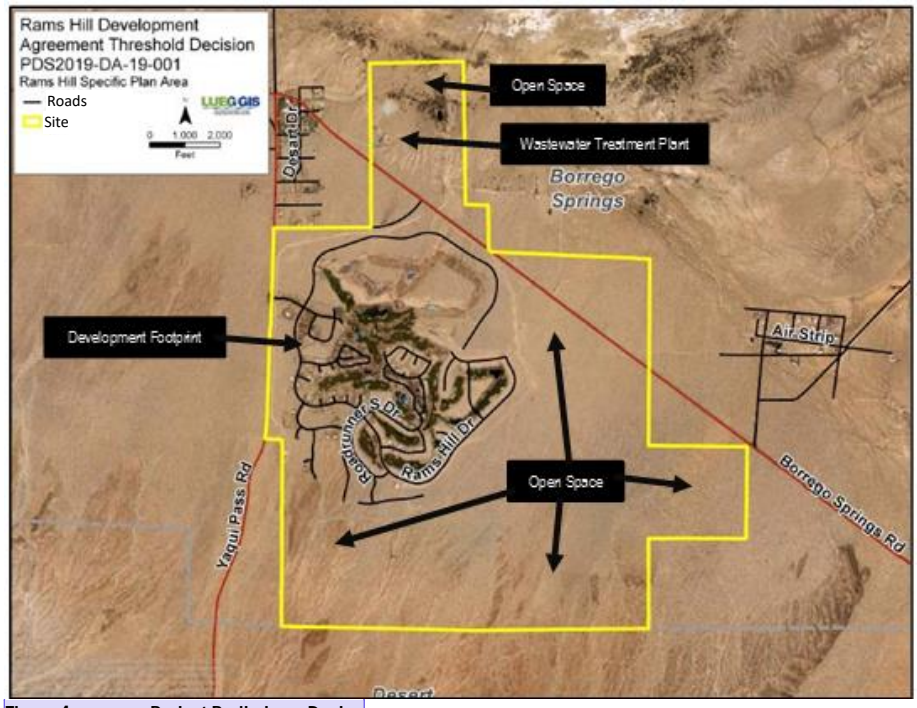

Figure 4. Project Preliminary Design

Commented [18]: If there is a more up to date site plan - we will need to request it. This is the most recent one we have.

Commented [19R18]: Need to request form T2 or the County.

3.0 Project Water Demand Determination

3.1 Residential Dwelling Units and Additional Lodging

The residential and lodging water demands for the Project were estimated using water sales data provided by BWD for fiscal year (FY) 2023-2024 (G. Poole, personal communication, February 11, 2025). In FY 2023-2024, BWD served 1,822 single-family residences a total of 679 acre-feet (AF) of water. Dividing the total residential water demand by the number of single-family residences served by BWD leads to an average single-family residence demand of 0.37 AF per year (AFY). Applying a 20% contingency factor to account for system losses, potential increased occupancy or increased periods of occupancy, and potential increases in climatic variability leads to a conservative single-family residence water demand factor of 0.45 AFY per equivalent dwelling unit (EDU). For this analysis, the 0.45 AFY per EDU demand factor is used to represent Project-related water demands for residential dwelling units, lodging units, and units constructed under the Workforce Housing Initiative (Section 2).

This WSA-required analysis assumes that, by 2055, the Project is expected to add 720 EDUs to the Specific Plan area. Applying the 0.45 AFY per EDU demand factor to this projected build out leads to a water demand in 2055 for Project new dwelling units of approximately 324 AFY. During the 30-year Project planning period additional development for lodging and workforce housing in the BWD service area will add 550 units with an additional water demand in 2055 of 247.5 AFY. Total water demand for new irrigation, Project new dwelling units, and lodging and workforce housing in 2055 is 1,371 AFY (**Table 3**).

Table 3. Project Water Demands

Water Year	New Irrigation Demands from Golf Course Expansion (AFY)[a]	Project New Dwelling Units[a]	Project New Dwelling Units Water Demand (AFY)	Lodging and Workforce Housing Units	Lodging and Workforce Housing Units Water Demand (AFY)[b]	Total Demand (AFY)[c]
2025	200	0	0	0	0	200
2026	200	24	10.8	32	14.4	225.2
2027	400	48	21.6	100	45	466.6
2028	800	72	32.4	150	67.5	899.9
2029	800	96	43.2	200	90	933.2
2030	800	120	54	220	99	953
2031	800	144	64.8	240	108	972.8
2032	800	168	75.6	260	117	992.6
2033	800	192	86.4	280	126	1012.4
2034	800	216	97.2	300	135	1032.2

Commented [20]: This includes the workforce housing initiative homes that are not a part of this project, but should be considered as other growth in Borrego. The EDUs in the project are projected to be 480 and the lodging units of 350 and 200 work force housing initiative EDUs. These total to the 1,030 in the draft report.

Commented [21]: I am confused by how the Lodging and Workforce housing demands are treated? They are not part of specific plan area as they are being built elsewhere. Yet, I also don't know where the water is coming from to serve those units. Will BWD be asked to serve those units?

Commented [22]: We should probably discuss whether this WSA is intended to cover irrigation demand? T2 insisted for purposes of BWD's approval of Form 399 that BWD would not be providing irrigation water for the golf courses.

Commented [23R22]: Agree. Irrigation would be an OPTION at this point. How about Dwellings in a stand alone table first with Irrigation shown separately as an OPTION with the COMBINED TOTAL shown that follows?

Commented [24R22]: See revisions to the introductory paragraph in Section 3.2. Does this address the concerns?

This table is just intended to highlight what the total project water demands are, which, in my opinion, should include irrigation demands. This table is not intended to demonstrate where the water will come from.

Commented [25R22]: Irrigation supply is a contractual issue between BWD and T2. The intent of the WSA is to show that BWD and T2 can meet the demand using available supply. Recommend crafting the WSA to be neutral as to who physically supplies the irrigation water.

Water Year	New Irrigation Demands from Golf Course Expansion (AFY)[a]	Project New Dwelling Units[a]	Project New Dwelling Units Water Demand (AFY)	Lodging and Workforce Housing Units	Lodging and Workforce Housing Units Water Demand (AFY)[b]	Total Demand (AFY)[c]
2035	800	240	108	320	144	1052
2036	800	264	118.8	420	189	1107.8
2037	800	288	129.6	420	189	1118.6
2038	800	312	140.4	520	234	1174.4
2039	800	336	151.2	520	234	1185.2
2040	800	360	162	550	247.5	1209.5
2041	800	384	172.8	550	247.5	1220.3
2042	800	408	183.6	550	247.5	1231.1
2043	800	432	194.4	550	247.5	1241.9
2044	800	456	205.2	550	247.5	1252.7
2045	800	480	216	550	247.5	1263.5
2046	800	504	226.8	550	247.5	1274.3
2047	800	528	237.6	550	247.5	1285.1
2048	800	552	248.4	550	247.5	1295.9
2049	800	576	259.2	550	247.5	1306.7
2050	800	600	270	550	247.5	1317.5
2051	800	624	280.8	550	247.5	1328.3
2052	800	648	291.6	550	247.5	1339.1
2053	800	672	302.4	550	247.5	1349.9
2054	800	696	313.2	550	247.5	1360.7
2055	800	720	324	550	247.5	1371.5

Notes:
AFY = acre-feet per year
[a] Source: West Yost 2025
[b] Represents reasonably foreseeable water demands associated with new lodging and workforce housing units. These demands are not associated with the Project.
[c] Irrigation demand + project dwelling unit demand + lodging and workforce housing units.

Commented [26]: If we consider extending to the 30 year point for the development agreement after consulting with the County, then this table would need to be extended.

Commented [27R26]: Table updated to 2055 and broken out by housing type.

3.2 Irrigation Demands

The Project proposes modifying one or both approved golf courses (one already built and in use and portions of the other historically in use) in the Specific Plan Area while keeping total permitted turf acres equal to the existing plan approvals. The existing golf course includes an 18-hole layout consisting of approximately 100 acres of irrigated turf (Figure 3). The Specific Plan Amendment designates 346.37 acres of land for golf courses (County of San Diego 2019), providing the flexibility to add up to 246.37 acres of irrigated golf course acreage to the Specific Plan Area. At full Project build out, the applicant anticipates that total golf course irrigation demands will reach approximately 1,400 AFY. The Project

Commented [28]: The plan is to add 18 holes and a small par 3 on top of the 18 holes already there now. T2 can help describe accurately in their review.

Commented [29]: T2 to provide input into golf course details.

proposes to meet its irrigation water demands either through operation of project-maintained and operated existing and new water wells or, optionally, by receiving irrigation water supplied from the BWD. To provide a conservative evaluation of water supply availability, this WSA assumes that Project future irrigation water beyond the 600 AF that the project will continue to supply would be provided by BWD.

The Rams Hill Golf Course demands from 2015 to 2024 are shown in **Table 4**. The average golf course demand over the last decade was approximately 800 AFY. Rams Hill has implemented several water conservation and golf course improvements over the last decade to optimize water use. In June 2023, Rams Hill launched Phase 1 of its agronomy plan, converting the greens from bentgrass to Mini Verde bermudagrass while also replanting the practice areas with TifTuf bermudagrass including bermudagrass conversion. In June 2024, Rams Hill launched Phase 2 of its agronomy plan with TifTuf bermudagrass conversion expanded to all tees, fairways replacing ryegrass and bentgrass (cool-season grasses). When fully implemented, the improvements are estimated to reduce water use by as much as 30 percent when stabilized (Rams Hill 2024).

Table 4. Annual Rams Hill Golf Course Water Demands 2015 to 2024.

Calendar Year	Annual Rams Hill Golf Course Water Demand (AFY)
2015	997.70
2016	940.20
2017	794.50
2018	714.36
2019	758.13
2020	782.19
2021	803.76
2022	776.91
2023	678.55
2024	768.75
Average	**801.51**

Source: Groundwater Monitoring Report for Rams Hill Golf Course, Permit #SP-86-006

These data represent current irrigation demands for the active golf course within the Specific Plan Area prior to full implementation of Phase 1 and 2 of its agronomy plan. Once fully implemented, the improvements are estimated to reduce water use by as much as 30 percent. Future irrigation demand for the currently active portion of the Rams Hill Golf Course is estimated at approximately 600 AFY. The proposed additional golf uses would add 800 AFY of irrigation demands to the Basin (Table 3) and combined with the existing course's future demand of 600 AFY, the total future irrigation demand is approximately 1,400 AFY.

Commented [30]: Hi Kipp, Probably best to use data post 2015 located as follows: S:\LAX\BORWD.C001.SWM\7801 Well Monitoring\Well Production\SD County major use permit reporting

Commented [31]: They planted new grass that will decrease use by 25% and they avoid overwatering. On the other hand they will be open year round and irrigate accordingly. In the past they did not water fairways in the summer. Not sure how the water demands on the existing will change compared to the past. T2 can help.

Commented [32R31]: The 1,400 AFY demand projection was provided by T2

Commented [33R31]: We did water fairways in the summer but will no longer we watering to restore the bermuda grass base that was damaged in the annual overseeding process which has been eliminated.

4.0 Borrego Water District

The BWD is a public agency formed in 1962 under the California Water Code Section 34000 et seq. as a California Water District with the responsibility of providing potable water, wastewater collection and treatment, and other services for portions of the unincorporated community of Borrego Springs in northeastern San Diego County (County). BWD, whose service area is surrounded by the Anza-Borrego Desert State Park, provides water to commercial, residential, and irrigation customers and has just over 2,000 potable water connections (BWD 2025a).

Groundwater pumped from the Basin is the sole source of supply for the BWD. The Basin is designated by the DWR as a critically overdrafted basin and a high priority for the development of a groundwater sustainability plan (GSP) in accordance with the Sustainable Groundwater Management Act (SGMA) (CWC Section 10720-10737.8, et al). In October 2016, the County and the BWD formed the groundwater sustainability agency (GSA) for the Borrego Valley to address the requirement to prepare a GSP. In August 2019, the County and BWD completed a draft final GSP[3] in accordance with the DWR's GSP Regulations defined in the CCR Title 23, Section 350 et seq. In accordance with a Settlement Agreement amongst Basin pumpers that were responsible for over 90 percent of the groundwater pumping in the Basin (Settling Parties), the GSP was subsequently modified and repurposed as the *Groundwater Management Plan for the Borrego Springs Subbasin* (GMP) to serve as an integral part of a "Physical Solution" in a groundwater rights adjudication of the Basin (BSW 2025).

In January 2020, a complaint seeking a comprehensive adjudication of the groundwater rights of the Basin was filed by the BWD in the CA Superior Court for San Diego County, pursuant to Code of Civil Procedure (CCP) sections 830, et seq (*Borrego Water District v. All Persons Who Claim a Right to Extract Groundwater in the Borrego Valley Groundwater Subbasin, et al.*, San Diego Superior Court Case no. 37--2020--00005776--CU-TT-CTL [later transferred to Orange County Superior Court]). The proposed Stipulated Judgment was filed with the Court pursuant to the Settlement Agreement. Additionally in January 2020, on behalf of the Settling Parties, the BWD submitted the proposed Stipulated Judgment and GMP to the DWR as an "Alternative" to a GSP, in accordance with CWC Section 10733.6 (b) (BSW 2025)[4]. The Judgment, including the GMP, was then resubmitted to DWR on or about June 25, 2021, after it had been approved by the Superior Court.

The County withdrew from the Borrego Valley GSA effective December 31, 2019 and the BWD withdrew as the Borrego Valley GSA on June 16, 2021 and informed DWR to direct all SGMA compliance matters to the Borrego Springs Watermaster (Watermaster) as the primary point of contact. This action formally dissolved the Borrego Valley GSA.

[3] Information regarding the GSP, including its stakeholder process, is available from the County's website.

[4] Information regarding the GMP, Stipulated Judgment and Alternative, is available from the Borrego Springs Watermaster's website.

5.0 Current and Projected Water Demands

This section of the WSA describes the current and projected water demands of the BWD. The water demands focus specifically on BWD because they will be the sole public water provider to the Project. Sections 6 and 7 describe projected water demands on the Basin as a whole and the adequacy of future groundwater supplies to meet these demands.

5.1 Current Water Demands on BWD

In FY 2024, BWD served 1,123 AF of to its customers for residential, commercial, industrial, and irrigation uses (G. Poole, personal communication, February 11, 2025; **Table 5**). These water demands include water served to all of Borrego Springs, including existing Specific Plan facilities.

Table 5. BWD 2024 Water Demands

Water Use	Hundred Cubic Feet	Acre Feet
Residential	295,872	679
Tier 1	106,226	244
Tier 2	98,931	227
Tier 3	90,715	208
Multiple Units	5	0
Irrigation	66,176	152
Commercial	66,286	152
Public Agency	46,992	108
Construction	13,286	31
Bulk Water	476	1
Total:	**489,093**	**1,123**

Source: G. Poole, personal communication, February 11, 2025.

5.2 Projected Water Demands on BWD

5.2.1 Residential Dwelling Units and Additional Lodging

In 2024, BWD initiated a rate study to improve its understanding of future water demands and inform its rate structure through 2035. For this rate study, BWD determined that population growth within its service area besides lodging and the workforce housing initiative not part of the Rams Hill Specific Plan Area Amendment over the next 10 years would not result in an increase in service connections maintained by the district. Based on this assumption, future water demands on BWD were estimated using the 2024 water sales data (Table 5), with the residential, multi-unit, commercial, public agency, construction, and bulk water demand totals adjusted to an average demand of 0.45 AFY per EDU (**Table 6**). As described in Section 3, this average EDU demand is 20% higher than the 2024 water

Commented [34]: As stated earlier, the workforce housing initiative is outside of the project and might better be considered as planned growth in Borrego to make sure that total projected water use is included in the WSA.

Commented [35R34]: See revised text.

demand and is intended to cover potential increases in population density, climatic variability, and system losses.

Table 6. Projected BWD Water Demands

Water Use	FY 2023-2024 Demands		2035 Projected Water Demands	
	Hundred Cubic Feet	Acre Feet	Acre-Feet	Method
Residential	295,872	679	815	20% Increase from FY-2023-2024, or 0.45 AFY per EDU
Tier 1	106,226	244	293	
Tier 2	98,931	227	273	
Tier 3	90,715	208	250	
Multiple Units	5	0	0	
Irrigation	66,176	152	166	Projected Increase in ET Demands[a]
Commercial	66,286	152	183	20% Increase from FY-2023-2024, or 0.45 AFY per EDU
Public Agency	46,992	108	129	
Construction	13,286	31	37	
BULK Water	476	1	1	
Total:	**489,093**	**1,123**	**1,331**	

Source: BWD 2025b

5.2.2 Irrigation Demands

Increasing temperatures and evapotranspiration demands are the most likely driver of increasing outdoor irrigation demands within BWD's service area. To support water supply planning, the California Department of Water Resources developed gridded estimates of future increases in evapotranspiration demands under different climate projection horizons and scenarios (DWR 2018). In its central tendency projections, DWR estimates that evapotranspiration demands will increase in the Basin by approximately 9% by 2070. Based on this, projected irrigation demands, excluding the Project, were estimated by increasing BWD's FY 2023-2024 irrigation demands by 9% (Table 6).

Commented [36]: Do we know if this is T2's existing demands? If we can pull out how much is currently served to T2 we can make sure we aren't double counting in the final analysis.

Commented [37R36]: This is BWD demand in FY 2023-24 per Geoff's 2/11/2025 email. I am not sure if any T2 demand is included...@Trey Driscoll should advise if we need to ask for clarification.

Commented [39]: Is this any outdoor irrigation or just certain kinds of irrigation?

Commented [40R39]: Any outdoor irrigation - DWR's climate projections are just a general assessment of future ET changes, which I think is appropriate for this type of evaluation.

Commented [41]: To be determined how to handle population growth

6.0 Existing and Projected Supplies

The key substantive requirement of a SB 610 WSA is the identification and description of the existing water supply sources available to the public water system that will serve the Project. Water Code section 10910(b) requires the WSA to identify any existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the Project and describe the quantities of water received in prior years by the public water system. The identification of existing water supply entitlements, water rights, or water service contracts held by the public water system must be demonstrated by providing information related to the following:

1. Written contracts or other proof of entitlement to an identified water supply;
2. Copies of a capital outlay program for financing the delivery of a water supply that has been adopted by the public water system;
3. Federal, state, and local permits for the construction of necessary infrastructure associated with delivering the water supply; and
4. Any necessary regulatory approvals that are required to be able to convey or deliver the water supply.

6.1 Groundwater Adjudication Judgment (including the Groundwater Management Plan)

The Borrego Springs Subbasin (Basin) is designated by the DWR as a critically overdrafted basin and a high priority for the development of a GSP in accordance with SGMA (CWC Section 10720-10737.8, et al). In October 2016, the County and the BWD formed the GSA for the Borrego Valley to address the requirement to prepare a GSP. In August 2019, the County and BWD completed a draft final GSP in accordance with the DWR's GSP Regulations defined in the CCR Title 23, Section 350 et seq. In 2019, in accordance with a Settlement Agreement amongst Basin pumpers that were responsible for over 90 percent of the groundwater pumping in the Basin (Settling Parties), the GSP was subsequently modified and repurposed as the *Groundwater Management Plan for the Borrego Springs Subbasin* (GMP) to serve as an integral part of a "Physical Solution" for the Basin (BSW 2025), as reflected in the final Judgment described in Section 6.2, below.

The GMP establishes and describes key groundwater management metrics for the Basin, including:

- The estimate of the sustainable yield;
- The estimate of historical and ongoing overdraft;
- Groundwater level and groundwater quality thresholds indicative of undesirable results;
- Projects and Management Actions anticipated to bring the Basin into sustainability by 2040.

On June 25, 2021, the GMP, along with the Stipulated Judgment (Section 6.2) was submitted to DWR to serve as a GSP Alternative for the Basin. DWR approved the Alternative on February 25, 2025 (DWR 2025).

6.2 Stipulated Judgment

On April 8, 2021, the California Superior Court of the County of Orange issued a decision adopting a Stipulated Judgement (Judgment) in *Borrego Water District v. All Persons Who Claim a Right to Extract Groundwater In the Borrego Valley Groundwater Subbasin NO. 7.024-01 Whether Based on* Appropriative Right, Overlying Right*, or Other Basis of Right To Use of Storage Space in The Subbasin; et al.*, (Case No. 37-2020-00005776). The Judgment was a result of the BWD's filing of a "friendly lawsuit" in January of 2020 as a result of the settlement agreement with 90% of the pumper sin the basin. The Judgment comprehensively determined and adjudicated all groundwater rights in the Basin and, along with the GMP for the Basin, constitutes the Physical Solution for the perpetual management of the Basin. To maintain a viable water supply for current and future beneficial uses and users of groundwater in the Basin, the sustainability goal of the Physical Solution is to ensure that by 2040, and thereafter within the planning and implementation horizon of the GMP (50 years), the Basin is operated within its Sustainable Yield and does not exhibit undesirable results as defined by CWC Section 10721(x). Some of the key provisions of the Judgment are highlighted below[5] (BSW 2025).

Watermaster[6]. The Watermaster is the special master to the Court responsible for administering the Judgment for the Basin. The Watermaster is governed by a five-member Board that is comprised of: one representative and one alternate representing the BWD; one representative and one alternate representing the County; one representative and one alternate representing the agricultural sector parties; one representative and one alternate representing the recreational parties; and one public/community representative and one alternate.

Establishment of Pumping Rights[7]. Exhibit 4 to the Judgment establishes a Baseline Pumping Allocation (BPA) for each Party with groundwater production rights in the Basin. BPA is transferable. The BPA is defined as the maximum allowed pumping quantity allocated to a Party to the Judgment (Judgment Section I.A.8). Exhibit 4 is updated annually with any changes to BPA allocation based on Permanent Transfers of rights.

The total BPA for the Basin is 24,293 AF. The BPA of BWD and T2 Borrego totals 11,150.3 AF, or approximately 46% of the total BPA for the Basin.

Table 7. Baseline Pumping Allocation for the BWD, T2 Borrego, and the Basin

Owner	Acre Feet	Percentage of Total BPA
Borrego Springs Basin	24,293.0	100%
BWD Total	3,673.3	15.1%
BWD (purchase from D&J Bauer, though this figure is expected to increase in the future)	415.0	1.7%
BWD (purchase from W. Bauer)	670.0	2.8%

Commented [42]: The BPA for both T2 and BWD do not match the values provided by T2 (Shannon)

Commented [43R42]: We should confirm BPA in Annual Report and have BWD and T2 confirm.

Commented [44R42]: These values are from Exhibit 4 - we can have T2 confirm.

[5] This is not intended to be a complete list of provisions or rules of operation pursuant to the Judgment.
[6] See Judgment Sections I.A.62, IV.A, and IV.B
[7] See Judgment Sections I.A.8, II.G, III.A, III.D, and III.H

Owner	Acre Feet	Percentage of Total BPA
BWD	2,588.3	10.7%
T2 Borrego Total	7,477.0	30.8%
T2 Borrego LLC	965.0	4.0%
T2 Palms LLC	887.0	3.7%
Formerly owned by Bagdasarian Farms, LLC	1,142.0	4.7%
Borrego Nazareth, LLC[8]	1,462.0	6.0%
T2 Borrego LLC (Ram's Hill Golf Club)	2,536.0	10.4%
T2 Farms LLC	485.0	2.0%

Source: Exhibit "4" Baseline Pumping Allocations, 2024

Determination of Sustainable Yield[9]. The Judgment defines the Sustainable Yield as the maximum quantity of water that can be cumulatively pumped on an annual basis from the Basin without causing an undesirable result, consistent with SGMA (CWC Section 10721(w)). Based on the findings presented in the GMP, the Judgment established the initial Sustainable Yield of the Basin at 5,700 AFY for the water year (WY) 2021 through WY 2025 period. This estimate was based on numerical groundwater flow modeling conducted with the Borrego Valley Hydrologic Model for a base period representative of long-term conditions in the Basin. On December 19, 2024, the Watermaster adopted an updated Sustainable Yield of 7,952 AFY.

The Judgment requires that the Sustainable Yield be redetermined by the Watermaster, with input and recommendations from the Technical Advisory Committee, every five years through 2035 (Section III.F of the Judgment). The schedule for redetermining the Sustainable Yield is as follows:

- By January 1, 2025 – Establish the Sustainable Yield for the Second Five-Year Period of WY 2026 through WY 2030.
- By January 1, 2030 – Establish the Sustainable Yield for the Third Five-Year Period of WY 2031 through WY 2035.
- By January 1, 2035 – Establish the Sustainable Yield for the Fourth Five-Year Period of WY 2036 through WY 2040.

The Judgment requires that Sustainable Yield estimates be made using the best available records and data, and sound scientific and engineering methods. The redetermined Sustainable Yield will consider all sources of replenishment, including return flows and underflows, and all outflows from the Basin, and will consider, among other data, information derived from updated runs of the Borrego Valley Hydrologic Model (BVHM).

Pumping Rampdown Schedule[10]**.** Rampdown is defined as the reduction in cumulative authorized pumping of BPA imposed pursuant to the terms of the Judgment to alleviate the Overdraft of the Basin and achieve Sustainable Groundwater Management and the reasonable and beneficial use of the Basin's water resources. "Annual Allocation" is the amount of groundwater each BPA holder can produce each

[8] T2 Borrego, LLC is the contract purchaser of the property owned by Borrego Nazareth, LLC.
[9] See Judgment Sections I.A.57, II.E, III.F, and IV.G
[10] See Judgment Sections I.A.5, III.E, and III.F

year. To ensure that the Annual Allocation does not exceed the Sustainable Yield of the Basin by 2040, the Judgment provides for an annual Rampdown schedule for Parties with BPA. The Rampdown amount is intended to be adjusted, as necessary, after each scheduled update of the Sustainable Yield estimate goes into effect (e.g., WY 2026, WY 2031, and WY 2036).

Beginning in WY 2021, the annual pumping rights of each Party, referred to as the "Annual Allocation," were reduced according to the Rampdown schedule prescribed in the Judgment. The initial Rampdown schedule, established using the initial Sustainable Yield estimate of 5,700 AFY, provided for a five percent annual reduction in pumping relative to the BPA for the first five years of Judgment implementation, such that in WY 2025 the Annual Allocation is 75 percent of BPA.

The Rampdown Rate for the period from 2025 through 2040 was updated by the Watermaster to account for the revised Sustainable Yield estimate of 7,952 AFY. According to the protocol established in the Judgment, the Rampdown Rate was reduced and the 2030 Annual Allocation target was increased by 39.5%, thus achieving a cumulative quantity of all Pumper's Annual Allocation equal to the mid-point between the revised estimate of Sustainable Yield and the cumulative quantity of all Pumper's BPA by Water Year 2029-2030.[11]

The Rampdown schedule through 2055 can be found in Table 8.

Table 8. Rampdown and Annual Allocation

Water Year	Rampdown (% of Total BPA)	Annual Allocations (Acre-Feet)	Sustainable Yield Estimate (AFY)
2020	100.00%	24,293	5,700
2021	95.00%	23,078	5,700
2022	90.00%	21,864	5,700
2023	85.00%	20,649	5,700
2024	80.00%	19,434	5,700
2025	75.00%	18,220	7,952
2026	73.27%	17,800	7,952
2027	71.55%	17,381	7,952
2028	69.82%	16,962	7,952
2029	68.10%	16,542	7,952
2030	66.37%	16,123	7,952
2031	63.01%	15,306	7,952
2032	59.64%	14,489	7,952
2033	56.28%	13,672	7,952
2034	52.91%	12,855	7,952

[11] The 39.5% increase is based on the increase in Sustainable Yield, approved by the Borrego Springs Watermaster on December 5, 2024, estimate relative to the initial sustainable yield estimate of 5,700 AFY. In other words, (7,952 AFY – 5,700 AFY) / 5,700 AFY = 39.5%

Water Year	Rampdown (% of Total BPA)	Annual Allocations (Acre-Feet)	Sustainable Yield Estimate (AFY)
2035	49.55%	12,038	7,952
2036	46.19%	11,220	7,952
2037	42.82%	10,403	7,952
2038	39.46%	9,586	7,952
2039	36.10%	8,769	7,952
2040	32.73%	7,952	7,952
2041	32.73%	7,952	7,952
2042	32.73%	7,952	7,952
2043	32.73%	7,952	7,952
2044	32.73%	7,952	7,952
2045	32.73%	7,952	7,952
2046	32.73%	7,952	7,952
2047	32.73%	7,952	7,952
2048	32.73%	7,952	7,952
2049	32.73%	7,952	7,952
2050	32.73%	7,952	7,952
2051	32.73%	7,952	7,952
2052	32.73%	7,952	7,952
2053	32.73%	7,952	7,952
2054	32.73%	7,952	7,952
2055	32.73%	7,952	7,952

Note: AFY = acre-feet per year; Annual Allocations could change after 2030 if the Watermaster changes Sustainable Yield in the future.

Allowance for Carryover[12]**.** The Judgment allows for a Party's unused Annual Allocation to be carried over for use in subsequent water years, subject to certain restrictions defined in Section III.B of the Judgment. Initially, the maximum quantity of Carryover that a Party can accrue is two times the amount of the Party's BPA (2x BPA). Carryover is subject to periodic review and adjustment by the Watermaster to prevent undesirable results. Once Carryover is accrued pursuant to rules then in effect, the rules may not be changed as to the accrued Carryover (e.g., the rate or amount of loss may not be modified) because the Groundwater reflected in Carryover is treated, for purposes of Basin-wide production accounting, as if already Pumped and used. Accordingly, any Basin-wide need for reduced Pumping will be achieved through additional Rampdown of BPA rather than reduction of a Pumper's existing Carryover.

[12] See Judgment Sections I.A.12, III.B, and IV.E.4

6.3 Water Supply Vulnerability

According to the *Draft Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001* (DWR 2002), if projected water demand associated with the proposed project was not accounted for in a UWMP, the water supply assessment shall include a discussion with regard to whether the public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planner future uses, including agricultural and manufacturing uses.

Precipitation patterns in the Borrego Springs area are influenced by two distinct sources. The first is Pacific frontal systems that bring regional rain bands to Southern California, typically between October and April. The second source is isolated and scattered thunderstorms that occur when moisture from the Gulf of California advects from south to north through Borrego Springs. This phenomenon is referred to as monsoon season and is strongest in the summer months but is not a regular consistent occurrence. Occasionally, the decaying remnants of former tropical storms or hurricanes can pass through the area and, in some years, these further enhance the precipitation totals during the monsoon season. Because of these disparate influences, the precipitation record is highly variable both seasonally and annually, which makes defining the parameters of "wet" or "dry" years difficult (e.g., one thunderstorm may drop half of the yearly total in an otherwise dry season). For the purposes of the precipitation record, years with above average precipitation are considered "wet," and years with below average precipitation are considered "dry" (BVGSA 2019).

The weather station with the longest and most complete precipitation record is the Borrego Desert Park Station maintained by the National Oceanic and Atmospheric Administration's (NOAA) National Climactic Data Center. The station has complete water year records from WY 1948 to present. The mean WY precipitation for this period is 5.52 inches, and the standard deviation from the mean is 3.43 inches. Years with precipitation within one standard deviation of the long-term average precipitation are defined as "normal," years with above "normal" precipitation are considered "wet," and years with below "normal" precipitation are considered "dry" (West Yost 2025).

Precipitation in WY 2024 was 2.83 inches, which is 2.69 inches less than the mean (5.52 inches) for the period of record, and the region has been experiencing a nearly 30-year dry period since 1993, punctuated by a few wet years (West Yost 2025).

Because this water supply is solely dependent upon groundwater pumped from the Borrego Springs Groundwater Subbasin, which is an adjudicated Basin ruled by the Stipulated Judgment, there is no variance in water supply depending on normal, wet, or dry years. Parties to the Judgment will receive their Annual Allocation as stipulated in the Judgment regardless of precipitation amount.

6.4 Projected Supplies

At present, 15.1% of the BPA is owned by BWD and 30.8% of the BPA is owned by T2 Borrego (Section 6.2). Based on their respective BPA's and the Rampdown rate described above, the projected Annual Allocations for BWD and T2 Borrego are shown in **Table 9**. Existing demands for T2 Borrego were

estimated using the average annual groundwater extractions reported for WY 2021 through 2024 for T2 Palms; T2 Borrego LLC, T2 Ram's Hill; T2 Farms, LLC; Formerly owned by Bagdasarian Farms, LLC and Borrego Nazareth, LLC. Existing demands for BWD are based on the assumptions described in Section 5.2.

Table 9. Projected Supplies

WY	Annual Allocations (AFY)	T2 Borrego (AFY)					BWD (AFY)					BWD & T2 Borrego Supply (AFY)[d]
		Allocated BPA[a]	Allowable BPA[b]	Existing Demands	Carryover	Maximum Carryover	Allocated BPA[c]	Allowable BPA[b]	Existing Demands	Carryover	Maximum Carryover	
2025	18,220	5,608	15,805	1,987	13,818	14,954	2,755	7,707	1,331	6,376	7,347	20,194
2026	17,800	5,479	19,297	1,987	14,954	14,954	2,692	9,067	1,331	7,347	7,347	25,046
2027	17,381	5,350	20,304	1,987	14,954	14,954	2,628	9,975	1,331	7,347	7,347	26,960
2028	16,962	5,221	20,175	1,987	14,954	14,954	2,565	9,911	1,331	7,347	7,347	26,768
2029	16,542	5,091	20,045	1,987	14,954	14,954	2,501	9,848	1,331	7,347	7,347	26,575
2030	16,123	4,962	19,916	1,987	14,954	14,954	2,438	9,785	1,331	7,347	7,347	26,383
2031	15,306	4,711	19,665	1,987	14,954	14,954	2,314	9,661	1,331	7,347	7,347	26,008
2032	14,489	4,459	19,413	1,987	14,954	14,954	2,191	9,537	1,331	7,347	7,347	25,633
2033	13,672	4,208	19,162	1,987	14,954	14,954	2,067	9,414	1,331	7,347	7,347	25,258
2034	12,855	3,956	18,910	1,987	14,954	14,954	1,944	9,290	1,331	7,347	7,347	24,883
2035	12,038	3,705	18,659	1,987	14,954	14,954	1,820	9,167	1,331	7,347	7,347	24,508
2036	11,220	3,453	18,407	1,987	14,954	14,954	1,697	9,043	1,331	7,347	7,347	24,133
2037	10,403	3,202	18,156	1,987	14,954	14,954	1,573	8,920	1,331	7,347	7,347	23,758
2038	9,586	2,950	17,904	1,987	14,954	14,954	1,450	8,796	1,331	7,347	7,347	23,383
2039	8,769	2,699	17,653	1,987	14,954	14,954	1,326	8,673	1,331	7,342	7,347	23,008
2040	7,952	2,447	17,401	1,987	14,954	14,954	1,202	8,544	1,331	7,213	7,347	22,627
2041	7,952	2,447	17,401	1,987	14,954	14,954	1,202	8,415	1,331	7,084	7,347	22,499
2042	7,952	2,447	17,401	1,987	14,954	14,954	1,202	8,287	1,331	6,956	7,347	22,370
2043	7,952	2,447	17,401	1,987	14,954	14,954	1,202	8,158	1,331	6,827	7,347	22,242
2044	7,952	2,447	17,401	1,987	14,954	14,954	1,202	8,030	1,331	6,699	7,347	22,113
2045	7,952	2,447	17,401	1,987	14,954	14,954	1,202	7,901	1,331	6,570	7,347	21,985
2046	7,952	2,447	17,401	1,987	14,954	14,954	1,202	7,772	1,331	6,440	7,347	21,856
2047	7,952	2,447	17,401	1,987	14,954	14,954	1,202	7,643	1,331	6,310	7,347	21,727
2048	7,952	2,447	17,401	1,987	14,954	14,954	1,202	7,512	1,331	6,178	7,347	21,599
2049	7,952	2,447	17,401	1,987	14,954	14,954	1,202	7,381	1,331	6,046	7,347	21,470
2050	7,952	2,447	17,401	1,987	14,954	14,954	1,202	7,248	1,331	5,912	7,347	21,342

Commented [45]: Demonstrate sufficiency of supply over 20 year period for Specific Plan Area.

Transfer of water rights occurs when building permit is obtained, goes from T2 to BWD for potable supply.

Commented [46]: Consider update for the closing of Bagdasarian and perhaps the Borrego Nazareth/BSR BPA?

WY	Annual Allocations (AFY)	T2 Borrego (AFY)					BWD (AFY)					BWD & T2 Borrego Supply (AFY)[d]
		Allocated BPA[a]	Allowable BPA[b]	Existing Demands	Carryover	Maximum Carryover	Allocated BPA[c]	Allowable BPA[b]	Existing Demands	Carryover	Maximum Carryover	
2051	7,952	2,447	17,401	1,987	14,954	14,954	1,202	7,114	1,331	5,777	7,347	21,213
2052	7,952	2,447	17,401	1,987	14,954	14,954	1,202	6,980	1,331	5,642	7,347	21,084
2053	7,952	2,447	17,401	1,987	14,954	14,954	1,202	6,844	1,331	5,505	7,347	20,956
2054	7,952	2,447	17,401	1,987	14,954	14,954	1,202	6,708	1,331	5,368	7,347	20,827
2055	7,952	2,447	17,401	1,987	14,954	14,954	1,202	6,570	1,331	5,229	7,347	20,699

Note: AFY = acre-feet per year; WY = water year; BWD = Borrego Water District.

[a] Represents annual allocations for T2 Borrego, LLC – Ram's Hill, T2 Borrego, LLC, T2 Farms LLC, T2 Palms, LLC.

[b] Represents the sum of the Allocated BPA and Carryover from the Previous Year. Carryover in 2025 includes the Carryover accrued by each Party through WY 2024. Carryover is capped at 2 x BPA.

[c] Represents annual allocations for Borrego Water District, BWD (Purchase from D & J Bauer and attached to APN 140-070-18), and BWD (Purchase from W. Bauer and attached to APN 140-070-018)

[d] Represents the difference between T2 and BWD's Allowable BPA and the Existing Demands. This value represents an accounting of water rights, and the physical supply is limited by the available pumping capacity of T2 and BWD wells.

7.0 Availability of Sufficient Supplies

Sections 3 through 6 summarize Project water demand and the existing and future water rights owned by the Project applicant and BWD, the public water provider for the Project. Table 7 provides a summary water budget for the Project and demonstrates that, based exclusively on the BPA owned by T2 Borrego and its affiliates, sufficient water supplies are planned for and are intended to be available over a 30-year Project planning horizon, under normal conditions, and in single and multiple dry years to meet the projected demand of the proposed Rams Hill Specific Plan Area Amendment Project, provided that T2 Borrego or its affiliates transfer sufficient BPA to BWD to meet the demands of the Project, as it is phased over time, and BWD and T2 Borrego reach a global agreement regarding the provision of water and sewer service to the Project. BWD's existing and future acquired BPA will not be used to serve the Project, except to the extent BWD receives BPA from T2 Borrego.

Commented [47]: All, I'm not sure this section and Table 10 adequately explain that Rams Hill is going to be transferring its BPA to BWD to supply the Project. BWD will not be using any of its existing or future BPA (other than what T2 transfers to BWD) to supply the Project. Instead, all of the BWD BPA will be used to supply BWD's existing customers, along with some ancillary smaller demands in the future. So, for example, showing a very positive balance of available supplies that relies upon BWD's BPA—see Table 10—is not really accurate accounting. Also, it is still hard to discern if this WSA is for municipal demands only. So far, T2 has stated it is likely to supply its own golf course irrigation demands.

Commented [48R47]: See revision to this second sentence.

I think Table 10 shows that T2 maintains sufficient BPA, on its own, to supply the Project. We can remove BWD from the table completely, but will need to add some additional context in the discussion that potable water demands would need to be provided by BWD, through the development of agreements and transfer of BPA from T2 to BWD.

Table 10. Availability of Water Supplies for the Project

Water Year	2025	2030	2035	2040	2045	2050	2055	Notes
Water Demands (Acre-Feet per Year)								
Existing Water Demands								
BWD	1,123	1,227	1,331	1,331	1,331	1,331	1,331	See section 5.2 for assumptions. 2030 is calculated as the average of the 2025 and 2035 projected BWD water demands
T2	1,987	1,987	987	600	600	600	600	Represents average WY 2021-2024 extractions by T2 Palms; T2 Borrego LLC, T2 Ram's Hill; T2 Farms, LLC; Formerly owned by Bagdasarian Farms, LLC and Borrego Nazareth, LLC for 2025 and 2030. Thereafter, the following of agricultural properties is modeled.
Reasonably Foreseeable Water Demands								
Lodging and Workforce Housing	0	99	144	248	248	248	248	Assumes development of 550 dwelling units, with a 0.45 AFY per EDU demand
Project Water Demands								
New Dwelling Units	0	54	108	162	216	270	324	See section 3.1 and 3.2 for assumptions
Irrigation	200	800	800	800	800	800	800	
Total Demand[a]	*3,310*	*4,167*	*3,370*	*3,141*	*3,195*	*3,249*	*3,303*	
Water Supply (Annual Allocations; Acre-Feet per Year)								

Water Year	2025	2030	2035	2040	2045	2050	2055	Notes
T2 – [Allocated BPA] & Allowable BPA	[5,608] 15,805	[4,962] 19,916	[3,705] 18,659	[2,477] 17,401	[2,477] 17,401	[2,477] 17,401	[2,477] 17,401	Represents annual allocations for TT2 Palms; T2 Borrego LLC, T2 Ram's Hill; T2 Farms, LLC; Formerly owned by Bagdasarian Farms, LLC and Borrego Nazareth, LLC
BWD – [Allocated BPA] & Allowable BPA	[2,755] 7,707	[2,438] 9,785	[1,820] 9,167	[1,202] 8,544	[1,202] 7,901	[1,202] 7,248	[1,202] 6,570	Represents annual allocations for Borrego Water District, BWD (Purchase from D & J Bauer and attached to APN 140-070-18), and BWD (Purchase from W. Bauer and attached to APN 140-070-018)
Total Supply [Allocated BPA] & Allowable BPA[b]	*[8,363] 23,512*	*[7,400] 29,701*	*[5,525] 27,826*	*[3,650] 25,945*	*[3,650] 25,302*	*[3,650] 24,649*	*[3,650] 23,971*	
Balance (Supply minus Demand; Acre-Feet per Year)								
Surplus without Project	20,194	26,284	24,364	22,379	21,736	21,083	20,405	
Surplus with Project	19,994	25,430	23,456	21,417	20,720	20,013	19,281	

Notes: Allowable BPA includes Carryover accrued through the prior Water Year. Values rounded to the nearest acre-foot.

[a] Represents the sum of existing demands, reasonably foreseeable water demands, and project demands.

[b] The total supply includes allowable BPA consisting of annually allocated BPA plus accrued carryover. Carryover is treated, for purposes of Basin-wide production accounting, as if already Pumped and used. Accordingly, any Basin-wide need for reduced Pumping will be achieved through additional Rampdown of BPA rather than reduction of a Pumper's existing Carryover. The key management action to achieve sustainability in the Basin is the Rampdown of pumping over a 20-year period such that by 2040 the aggregated Annual Allocation of pumping rights to all Parties would be equal to the Sustainable Yield of the Basin. As such, comparison of T2's and BWD's allocated BPA (without carryover) provides a more conservative approach to evaluate availability of water supply. Provided the fallowing of agricultural properties that T2 has acquired, there is suffiecnet BPA (without carryover) to supply the existing, reasonably foreseeable and project water demands.

8.0 CONCLUSIONS

The BWD acknowledges the essential requirement of balancing water supply with demand and the inherent need to have a flexible and adaptable water supply implementation strategy that can be relied upon for an uncertain future climate. The BWD and Subbasin stakeholders are implementing a Physical Solution though the Stipulated Judgment, and will continue to adapt, their water resource plans and strategies to meet climate, environmental, and legal challenges so that they may continue to provide water supplies to their service area. The BWD's projected supplies through the 30-year planning horizon can meet the projected demand of the Project, along with existing and other planned development projects within the BWD's service area, provided that T2 Borrego or its affiliates transfer sufficient BPA to BWD to meet Project demands both as phased and at full build-out. There exists sufficient water based on review of water rights accounting across the planning projection period to serve the Project's proposed variable water demands through 2055. Although no supply deficits are anticipated during the 30-year planning horizon, any unforeseen deficits due to revision of the Sustainable Yield of the Borrego Springs Subbasin could be augmented by Rams Hill Specific Plan Area implementation of end-use efficiency, and conservation as well as acquisition of additional water rights.

This WSA does not create a right or any entitlement to water service (CWC Section 10914). The WSA is not a commitment to serve the Project but rather serves as a review of BWD's total projected water supplies as required by State legislation.

Accordingly, this WSA assesses, demonstrates, and documents that the BWD's total projected water supplies available during the 30-year projections will meet the projected water demand associated with the Project, in addition to the BWD's existing and planned future uses, provided that T2 Borrego or its affiliates transfer sufficient BPA to BWD to meet Project demands both as phased and at full build-out.

In addition to this WSA, a water supply verification (WSV) is required to be prepared prior to the adoption of the final subdivision map and ensures that the sufficient water supply is available from BWD to serve the Project before construction begins.

Commented [49]: Not so. T2 needs to provide all its own water supply and do its own water conservation. We cannot suggest other BWD customers will conserve to make sure there is enough water to support Rams Hill.

Commented [50R49]: @Trey - can you respond / revise as appropriate?

Commented [51R49]: Clarified to indicate that Rams Hill Specific Plan Area would be responsible for end-use efficiency and conservation measures. For instance Rams Hill could adopt a landscape ordinance that mandates specific types of low water use landscaping. Some of this is already required by County under current regulations.

9.0 References

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Attachment A

T2 Borrego LLC Rams Hill Specific Plan Area Amendment Project
Request to provide a 399 Will Serve Letter

Attachment B

County of San Diego Water Supply Assessment Request