

APPENDIX G

GSP Comments and Responses

Comments received by BWD regarding the Stipulated Judgment and BWD's responses have been added at the end of this Appendix.

APPENDIX G RESPONSES TO COMMENTS

Under the Sustainable Groundwater Management Act (SGMA), the County of San Diego (County) and Borrego Water District (BWD), as the Groundwater Sustainability Agency (GSA) for the Borrego Springs Groundwater Subbasin (Subbasin), has solicited and responded to comments from the public and from other agencies concerned with the Draft Groundwater Sustainability Plan (GSP). The Draft GSP was made available by the GSA for public review on March 22, 2019. The public comment period for the Draft GSP ended on May 21, 2019. Agencies, organizations, and individuals submitting comments on the plan are listed below, organized by category.

Letter Number	Organization/Commenter
C1	Borrego Springs Community Sponsor Group
I1	Janet Johnson
I2	Bill Carpenter
I3	Lee Grismer
I4	John Geyer
I5	Eric Nessa
I6	Larry Grismer
I7	Linda Goodrich
I8	Pat Hall
I9	Mike Himmerich
I10	Jeff Grismer
I11	Bill Bancroft
I12	Steve and Debbie Riehle
I13	Terry and Pam Rhodes
I14	Rebecca Falk
I15	Rebecca Falk
I16	Rebecca Falk
I17	Rebecca Falk
I18	Diane Johnson
I19	Bill Berkley
I20	Jack and Linda Laughlin
I21	Richard and Artemisa Walker
I22	Eric Nessa
I23	Marsha Boring
I24	John Peterson
I25	Robert Kleist
I26	Garold Edwards
I27	Mark Jorgenson
I28	Don Rideout
I29	Judy Davis
I30	Cary Lowe
I31	Bill Haneline

RESPONSES TO COMMENTS

Letter Number	Organization/Commenter
I32	Hugh Dietz
I33	Cristin McVey
I34	Henry Liu
I35	Susan Boutwell
I36	Thomas Hall
I37	Rudy Monica
I38	Lance Lundberg
I39	Barry Berndes
I40	David Leibert
I41	Elena and John Thompson
I42	Joseph Tatusko
I43	Paul Ocheltree
I44	Ray Shindler
I45	Ray Shindler
I46	Saul Miller
I47	Gary Haldeman
I48	Gary Haldeman
I49	Diane Martin
I50	I Donald
I51	Herbert Stone
I52	Karen and Fred Wise
I53	Jack Sims
I54	Joanne Sims
I55	James Roller
I56	Jeff Meagher
I57	Heather Davidson
I58	Linda Roller
I59	John and Mary Delaney
I60	Ellen Fitzpatrick
I61	Michael Wells
I62	Harold and Joanne Cohen
I63	Jennifer Edwards
I64	Wayne Boring
I65	Barbara Coates
I66	Timothy Kight
I67	Mary Leahy
I68	Betsy Knaak
I69	Ginger Dunlap-Dietz
I70	Charlene Aron
I71	Sandy Jorgenson-Funk
I72	Sally Theriault
I73	Bob Theriault

Letter Number	Organization/Commenter
I74	Merrij Smith
I75	Linda Mocere
I76	D.E. and R.A. Owen
I77	Gary Funk
I78	Linda McBride
I79	Jeanne Gemmell
I80	Cyril Weaver
I81	Marjorie and Paul Schuessler
I82	Alfred DeVico
I83	Liesel Paris
I84	Sal Mocerì
I85	Heidi Noyes
I86	Robin Montgomery
I87	William Bonnell
I88	James Rickard
I89	Grace Rickard
I90	Jim Wilson
O1	Agricultural Alliance for Water and Resource Education (AAWARE), Michelle Staples, Jackson Tidus, A Law Corporation
O2	AAWARE, Michelle Staples, Esq. and Boyd Hill, Esq., Jackson Tidus, A Law Corporation
O3	T2 Borrego (Owner of Rams Hill Golf Course), Russell McGlothlin, O'Melveny
O4	Tubb Canyon Desert Conservancy, J. David Garmon, President
O5	The Nature Conservancy, Sandi Matsumoto, Associate Director, California Water Program
O6	San Diego Audubon Society, James A. Peugh, Conservation Chair
O7	Anza Borrego Foundation, Bri Fordem, Executive Director
O8	Clean Water Action, Jennifer Clary, Water Program Manager
O9	Borrego Village Association, J. David Garmon, Acting President
O10	Borrego Springs Unified School District, James L. Markman
O11	Borrego Springs Unified School District, Martha Deichler, School Community Liaison
O12	Borrego Stewardship Council, Diane Johnson
O13	Borrego Stewardship Council, Diane Johnson
O14	Borrego Water District, Kathy Dice, President, Board of Directors
O15	Borrego Valley Endowment Fund, Bob Kelly, President
S1	California Department of Fish and Wildlife, Leslie MacNair, Regional Manager, Inland Desert Region
S2	California State Parks, Gina Moran, District Superintendent

Notes: L = local agency; C= community; O = organization; I = individual; S = state agency.

All comments received on the Draft GSP have been coded to facilitate identification and tracking. Each of the written comment letters and public hearing comments received during the public comment period were assigned an identification letter and number, provided in the list above. These letters and public hearing comments were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers. Each letter is the submittal of a single

individual, agency, or organization. The comment letters' identification consists of two parts. The first part is the letter and number of the document and the second is the number of the comment. As an example, Comment S2-1 refers to the first comment made and addressed in Comment Letter S2. Copies of the bracketed comment letters may be requested by contacting the Plan Manager, or visiting the GSA's website at <https://www.sandiegocounty.gov/content/sdc/pds/SGMA/borrego-valley/GSP.html>.

To finalize the GSP, the GSA has prepared the following responses to comments that were received during the public review period.

RTC.4 COMMUNITY GROUPS

Letter C1

Commenter: Rebecca Falk, Chair, Borrego Springs Community Sponsor Group
Date: Undated.

C1-1 The Groundwater Sustainability Agency (GSA) acknowledges the Borrego Springs Sponsor Group's opposition to any groundwater use reductions for the municipal sector. While the Groundwater Sustainability Plan (GSP) does not set specific groundwater use reductions, the GSP includes Project and Management Action No. 3 – Pumping Reduction Program. As indicated in the GSP, the GSA will prepare California Environmental Quality Act (CEQA) documentation (after GSP adoption) in advance of considering formal adoption and implementation of any groundwater use reductions and a specific ramp down schedule. The GSP also indicates an agreement among the pumpers or GSA adoption of an interim ramp down schedule are two possible scenarios where pumping reductions could start prior to CEQA review completion.

The portion of this comment regarding future groundwater reductions does not address the adequacy of the Draft GSP, and therefore, no further response is required or necessary.

The GSA acknowledges the Borrego Springs Sponsor Group's request for Borrego Water District (BWD) baseline pumping allocation to be increased to approximately 2,700 acre-feet per year or remain at 2,461 acre-feet per year. The GSP has been revised to reflect 2,731 acre-feet per year as the baseline pumping allocation for BWD. This has been revised up from 2,122 acre-feet per year to include water that was provided in 2010 by BWD to the Rams Hill Golf Course.

C1-2 The GSA acknowledges the Borrego Springs Sponsor Group's request to front load groundwater reductions. While the GSP does not set specific groundwater use reductions, the GSP includes Project and Management Action No. 3 – Pumping Reduction Program. As indicated in the GSP, the GSA will prepare CEQA documentation (after GSP adoption) in advance of considering formal adoption and implementation of a specific ramp down schedule. The GSP also indicates an agreement among the pumpers or GSA adoption of an interim ramp down schedule are two possible scenarios where pumping reductions could start prior to CEQA review completion.

This comment does not address the adequacy of the Draft GSP, and therefore, no further response is required or necessary.

C1-3 The comment suggests that the language within the body of the Draft GSP regarding Mandatory Water Metering should be strengthened to ensure that the provisions specified in Appendix E are in fact mandatory. Revisions have been made to page 3-39 to clarify that the details within Appendix E are mandatory requirements. Page ES-5 has also been clarified that mandatory metering “will” take place following adoption of the GSP.

C1-4 The GSA acknowledges the Borrego Springs Sponsor Group’s request to explicitly state within the GSP specific authorities the governing body will have upon adoption of the GSP to impose mandatory water quality monitoring on any wells in the subbasin. The GSP indicates that the GSA continues to work with private landowners to expand the monitoring network.

This comment does not address the adequacy of the Draft GSP, and therefore, no further response is required or necessary.

C1-5 When and if water quality becomes a concern that may require mitigation within any portion of the Subbasin, the GSA may consider implementing Project and Management Actions No. 4 – Water Quality Optimization and/or No. 5 – Intra-Subbasin Water Transfers Program. Funding sources for the Project and Management Actions (PMAs) will be considered by the GSA prior to implementation.

This comment does not address the adequacy of the Draft GSP, and therefore, no further response is required or necessary.

C1-6 The GSA acknowledges the Borrego Springs Sponsor Group’s request to add the Sponsor Group and Ratepayers to the GSP as stakeholders for development of the Water Trading Program. The GSP outlines the anticipated development approach of the Water Trading Program by the GSA to identify stakeholders/participants and conduct interviews and meetings to receive input and identify concerns to be addressed in program development.

This comment does not address the adequacy of the Draft GSP, and therefore, no further response is required or necessary.

C1-7 The GSA acknowledges the Severely Disadvantaged Community (SDAC) status of Borrego Springs. The GSA will take this comment into consideration when considering imposing fees to fund GSP implementation.

This comment does not address the adequacy of the Draft GSP, and therefore, no further response is required or necessary.

Comment Letter I1

From: Janet Johnson <fishandwhistle65@gmail.com >
Sent: Saturday, May 18, 2019 9:37 PM
To: LUEG, GroundWater, PDS
Subject: Proposed Borrego Valley Groundwater Sustainability Plan

Mr. Jim Bennett:

My husband and I have a home at the Borrego Air Ranch. I appreciate the efforts involved in creating a sustainable plan for water in the future of the Borrego Valley and certainly think it is an important issue to tackle. However, I would like to share our thoughts on the fairness of the proposed plan.

First, it seems like those who use proportionally little of the water in the valley are being asked to decrease water usage by the same amount as the higher users who have had a bigger role in the progressive depletion of the aquifer. If the agricultural interests have used 70% of the water in the past, they should reduce their water usage by a higher percentage than residences which have had a much lighter role in decreasing the water table. If golf courses have used 18% of the water in the past, they should also reduce their water usage more than residences, perhaps making a bigger use of grey water to maintain the course. Requiring a 75% water reduction across all segments of the community will do a great harm to the community and hurts those most who have not had the biggest role in depleting the aquifer.

Secondly, The Borrego Air Ranch has its own two wells, which have been drawn from a water table that has not been decreasing. The BAR water levels have been stable for more than 50 years. Having the 75% water reduction over the next 20 years will not affect the rest of the Borrego Valley aquifer. The BAR residents are already very careful with their water in order to maintain this stability. Forced reduction in water usage would have a very negative effect on the air ranch community, would affect health and safety, and would of course decrease property values (as it would in other residential areas of Borrego.)

While applauding that there is a tentative plan, we would urge you to make the mandatory reduction for residents a lower percentage and if possible, to leave the Borrego Air Ranch out of the mandatory requirements. The Borrego Valley is a wonderful place with many exciting, progressive things going on. We hope this unfair water reduction plan will not bring this to an end.

Sincerely,

Mary Janet Johnson

I1-1

INTENTIONALLY LEFT BLANK