

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.

Letter I45

Commenter: Thomas Bunn

Date: October 24, 2017

I45-1 The Groundwater Sustainability Agency (GSA) received an email from Ray Shindler with an attached October 24, 2017, memorandum regarding “Response to Agricultural Representative Agenda Paper #1.”

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

INTENTIONALLY LEFT BLANK

Comment Letter I46

From: Dr.Saul L.Miller <drmillers@saulmiller.com>
Sent: Monday, April 29, 2019 9:04 AM
To: LUEG, GroundWater, PDS
Subject: Borrego Springs significant overdraft (SGMA)
Attachments: A Comment to the Board of the Borrego Water District.docx

Dr. Saul L. Miller
Performance Psychologist
Author: Performing Under Pressure
Why Teams Win
Hockey Tough: a Winning Mental Game
[email: drmillers@saulmiller.com](mailto:drmillers@saulmiller.com)
[web: saulmiller.com](http://saulmiller.com)
PO Box 1763, Borrego Springs, CA 92004
760 767 5496

A Comment to the Borrego Water District Board and San Diego County

As a ratepayer very interested in the water situation, I would like to state the following:
First, I appreciate the Borrego Water District Board has an important and challenging task to ensure that the ratepayers in the community are well served. I also appreciate they are efforting to do what they think is best.

With SGMA, there is the need to come up with an acceptable plan in the relatively near future to resolve the aquifer's critical overdraft. This is, of course, challenging.

The data are clear: Ratepayers, who use only about 10% of the water, have made significant reductions in their water use in the recent past.

It is also clear that Agriculture has overwhelmingly been the major pumper consuming approximately 70% of the water, thus principally causing the overdraft. Furthermore, agriculture's water use in recent decades has increased.

I am not privy to meetings between the BWD Board, Ag representatives and the recreational water use representatives. There has been very little disclosure as to what has been and is transpiring. However, from what I have learned to date, I do not believe that ratepayers' wishes are being well represented at these meetings.

Whereas it is understood we all have to reduce our water use to deal with the problem and the demands of SGMA, I and many of the ratepayers I have spoken with, feel that the ratepayers should not be asked to reduce the same proportional amount as the Ag people who through their 70% use of the water have been a principal cause of the problem.

If ratepayers were to reduce 45-50% instead of 75% as has been rumored, we would appreciably increase the water available to us... and would need to purchase less in the future. Further, that increase of 25- 30% would have relatively little impact on the available water for the 20-30 Ag pumpers.

Three additional comments: 1. Clearly, the aquifer is severely stressed. The sooner Ag is made to reduce their intense pumping the better it is for preserving water quality and quantity.

2. In addition, every effort must be made to create some rules to limit hoarding. Without rules, it is conceivable certain interests with deep pockets could purchase excessive amounts of water.

3. It has been suggested it will be very expensive to refurbish and maintain the existing water infrastructure in the future. The BWD Board suggests that money will be available to buy whatever water we need in the future AND to maintain the aging infrastructure. Yet no clear plan has been articulated as to where this money will come from.

Thank you for your consideration of these matters.
Respectfully,
Saul L. Miller Ph.D.

146-1

146-2

146-3

146-4

146-5

Letter I46

Commenter: Saul Miller

Date: April 29, 2019

I46-1 The comment provides introductory statements regarding the need to resolve the overdraft and recent water use patterns of the Borrego Water District and agricultural pumpers.

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

I46-2 The Groundwater Sustainability Agency (GSA) acknowledges the commenter's request that Borrego Water District not be subject to the same proportional reductions as agricultural pumpers. The commenter further suggests reductions of 45 to 50% instead of 75% would appreciably increase water available to the Borrego Water District.

While the GSP does not set specific groundwater use reductions, the GSP includes Project and Management Action (PMA) No. 3 – Pumping Reduction Program. As indicated in the GSP, the GSA will prepare the 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 is a possible scenario where groundwater use reductions could be developed.

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

I46-3 The GSA acknowledges the commenter's request to front load groundwater reductions for agricultural pumpers.

While the GSP does not set specific groundwater use reductions, the GSP includes PMA 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 is a possible scenario where groundwater use reductions could be developed.

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

I46-4 The GSA acknowledges the comment that rules to limit hoarding should be included to protect against interests with purchasing excessive amounts of water. Section 4.2.1 of the GSP includes a summary of the process to develop a water trading program which includes identifying unintended consequences of the Water Trading Program to be addressed in development of governing documents (e.g., hoarding, speculation, price fixing, collusion).

I46-5 The comment requests consideration regarding BWD expenses of future water and infrastructure needs.

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

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

May 14, 2019

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

Dear Mr. Bennett;

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

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

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

Thank you so much for your unrelenting efforts over these last few years. The GSP for the Borrego Basin is truly a benchmark piece of work that has laid the groundwork for all future efforts towards implementing the sustainable use the groundwater in our valley.

Best regards,



Gary Haldeman
Ratepayer Representative,
Advisory Committee, GSP
P.O. Box 2708
Borrego Springs CA 92004
gary@garybaldy.com

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

May 15, 2019

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

Dear Mr. Bennett;

I'd like to add a second letter to the mix, as the Ratepayer Representative for the GSP in order to address a single item of great interest to me and to the ratepayers I represent.

As you know, my involvement on the AC, as the Ratepayer Representative, only began late in October, early November. In some senses, I have been at a disadvantage when I look at my fellow representatives. On the other hand, I have had the benefit of a fresh, unimpeded perspective of the process.

Early on during the process, the baseline period selected to determine the BPAs for the basin pumpers is the 5-year period from January 1, 2010 to January 1, 2015. "This rate is determined by adding up the maximum amount of water used by each pumper of groundwater in the Subbasin" over this 5-year period.

At least in the initial years of plan implementation, this figure is one of the most important elements because it will determine, in BWD's case, when the ratepayer first begins to feel the effect of the reductions: the greater the BPA, the longer it will take to affect our water usage.

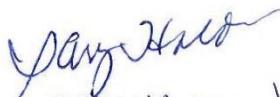
The 5-year time frame, in conjunction with the period being limited to only these five years, is certainly the worst possible situation for BWD. BWD began reducing its usage in 2003, when it pumped 3926 AF. In 2010, BWD pumped 2730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1700.

During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 AF. These figures are a clear indicator that the parties responsible for this timeframe of overdraft were pumpers other than BWD: 70% due to farming, 20% due to recreation/golf courses.

Thus, choosing 2010-2015 as the baseline years to determine BPAs is clearly to the detriment of the ratepayer singularly, and unquestionably favors farmers first, and golf courses next.

This is patently unfair, arbitrary and in the big picture, manipulative and probably illicit. How did this happen? How was the decision made?

I believe, in the spirit of fairness, that the period should be at least 10 years, perhaps the 10 years prior to 2010: 2000-2010. It should certainly not be based on the period of time when BWD began its reductions and, as the figures above show, other pumpers increased their water use.


GARY HOLDEN
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BS, CA 92004

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Traduções
P.O. Box 2708
Borrego Springs
California 92004

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C/O SIM BENNETT
5510 DIABLO AVE. SUITE 300
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92123-12385



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

May 14, 2019

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

Dear Mr. Bennett;

The aquifer that serves Borrego Springs has been in overdraft for decades and classifies as critical overdraft today. While residents have responded to this crisis by cutting back water use by over 50% in the past 40 years, agriculture has responded by drilling deeper wells and expanding. The net result is a water table that has already dropped over 100 feet and drops an additional 1-2 feet per year.

Borrego Springs is also in an uncomfortably unique situation in California: due to our geographic isolation we are not able to import water from elsewhere in the state. The aquifer that serves our community is our only source of water and it is in a 70% overdraft situation. Of the water removed from our aquifer annually, agriculture pumps 70%, golf courses pump 20% and residential and business rate-payers in Borrego use the remaining 10% of the total

As a Borrego Springs homeowner, I ask you to support the four objectives toward water sustainability stated by the Borrego Springs Water District Ratepayers for the Groundwater Sustainability Plan (GSP) under SGMA (Sustainable Water Management Act). This plan is currently under public review:

1. BWD Ratepayers should be allocated an initial minimum of 1700 AFY. This total represents an over 50% decrease in our historical average, a result of significant conservation efforts that are already in place. This allocation (1700 AFY) should be excluded from any reductions.
2. The 20-year implementation period set out in our GSP should be shortened significantly or planned reductions should be front-loaded. Straight-line reductions over a 20 year period will result in a greatly lowered aquifer, costlier water pumping and water of poorer quality.
3. Water quality is an essential concern, it should be addressed immediately, and if/when water quality issues are determined the parties responsible must be held to account for any remediation that might be necessary.
4. Groundwater Dependent Ecosystems must be considered in the overall water allocation calculus and timing of reductions. Water set-asides for GDEs are meaningless if the "set-aside water" sits in a drastically reduced water table, unavailable to the ecosystems it is intended to support.

Finally, BPAs are arguably one of the most important elements in the implementation process: witness the ongoing battle among stakeholders to establish the highest BPA possible. For reasons unclear to us, the ratepayers, the timeframe set out in the GSP – 2010 to the end of 2014 – is certainly the worst possible interval for BWD. BWD began reducing its usage in 2003, when it pumped 3926 AF. In 2010, BWD pumped 2730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1700.

During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 AF. These figures are a clear indicator that the parties responsible for the overdraft were pumpers other than BWD: 70% due to farming, 20% due to recreation/golf courses.

Thus, choosing 2010-2015 as the baseline years to determine BPAs is clearly to the detriment of the ratepayer, and unquestionably favors farmers first, and golf courses next.

This is patently unfair, arbitrary and in the big picture, manipulative and probably illicit.

Sincerely,
Diane Martin (Roadrunner #225)
~~Santa Fe~~



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

May 14, 2019

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

Dear Mr. Bennett;

At one time, many decades ago, it was believed that Borrego Springs had an unlimited water supply. With that false belief and extensive advertising came numerous agricultural farms, golf courses and, of course, residents to Borrego Springs.

Through modern day monitoring and measuring, unfortunately, we have determined the Borrego Springs ground water supply has dropped drastically and alarmingly the past 30 years. Although the residents use 10% of the water supply, agriculture uses 70% and golf courses use 20%.

The resident/ratepayers have buckled down and reduced their use over the last 10 years from some 2700 acre feet/year to 1700 acre feet/year and in the process have seen their water bills increase three times! Distressingly, agriculture has not significantly reduced their water usage nor have the golf courses.

Change is hard but we must all work together as a community to save the town of Borrego Springs. Following are our four main concerns, beliefs and objectives:

- We believe that BWD/Ratepayers should be allocated an initial minimum of 1700 AFY; this allocation should be excluded from any **further** reductions.
- We believe that the 20-year implementation period set out under SGMA should be shortened.
- We believe that water quality is an essential concern, it should be addressed immediately, and if/when water quality issues are determined, the parties responsible are held to account for any remediation that might be necessary.
- We believe that the GDEs (Groundwater Dependent Ecosystems) must be considered in the overall water allocation calculus.

Finally, BPAs are arguably one of the most important elements in the implementation process: witness the ongoing battle among stakeholders to establish the highest BPA possible. For reasons unclear to us, the ratepayers, the timeframe set out in the GSP – 2010 to the end of 2014 – is certainly the worst possible interval for BWD. BWD began reducing its usage in 2003, when it pumped 3926 AF. In 2010, BWD pumped 2730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1700.

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A. Donald
PO Box 2125
Borrego Springs, CA 92004

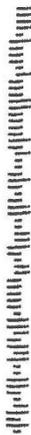
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c/o Mr. Jim Bennet
5510 Overland Ave, Suite 310
San Diego, CA 92123

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C/O: Jim Bennet
5510 Overland Avenue, Suite 310
San Diego, CA 92123

May 14, 2019

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Best regards,

A handwritten signature in black ink that reads "Herbert Stone". The signature is written in a cursive, flowing style.

Herbert Stone

PO Box 1929

3275 West Star Rd.

Borrego Springs, CA 92004

Herbert Stone
PO Box 1929
Borrego Springs, CA
92204

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May 14, 2019

Ref: Groundwater Sustainability Plan
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- We believe that the 20-year implementation period set out under SGMA should be shortened.
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Very Truly Yours, *Frederic J. Wise*

Karen & Fred Wise
315 S. Coast Hwy 101, Ste U, PMB 184
Encinitas, CA 92024

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Planning and
Development Services

Attn: Jim Bennett

92123-12398E

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County of S.D.
Planning & Dev. Services
5510 Overland Ave, #310
San Diego, CA 92123

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C/O: Jim Bennet
5510 Overland Avenue, Suite 310
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THANK YOU,
Jack Sims



Sims
PO Box 801
Borrego Springs, CA
92004

County of San Diego
Planning & Development Services
c/o Jim Bennet
5510 Overland Ave. Suite 310
San Diego, CA 92123

92123-123585



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County of San Diego
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C/O: Jim Bennet
5510 Overland Avenue, Suite 310
San Diego, CA 92123

May 14, 2019

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

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We are in dire need of a solution to our "critical overdraft" situation. You will learn quickly, if you don't already know, that agriculture, specifically, the Farmers, are depleting our aquifer at an unsustainable rate by irrigating their non-native citrus and palm orchards. They consume over 70% of the aquifer.

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Agriculture was established in Borrego Springs before the town. They own the rights to the water. The town has grown as the agriculture has grown. There are now more people than orchards. People are more important than grapefruits.

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Regards,
Joanne Simms

P.O. Box 801
BS, CA 92004

Jim Bennet
5510 Overland Ave. # 310
San Diego, CA 92123

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

May 14, 2019

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

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The resident/ratepayers have buckled down and reduced their use over the last 10 years from some 2700 acre feet/year to 1700 acre feet/year and in the process have seen their water bills increase three times! Distressingly, agriculture has not significantly reduced their water usage nor have the golf courses.

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Thank you,


James R.oller
561 Catarina Dr.
Borrego Springs, CA
92004



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San Diego, CA 92123

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

May 14, 2019

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

Dear Mr. Bennett;

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

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

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

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Thank you so much for your unrelenting efforts over these last few years. The GSP for the Borrego Basin is truly a benchmark piece of work that has laid the groundwork for all future efforts towards implementing the sustainable use the groundwater in our valley.

Best regards,

A handwritten signature in black ink that reads "Jeff Meagher". The signature is written in a cursive style with a large, stylized "J" and "M".

J. Magher
PO Box 1250
Borrego Springs CA 92004

County of S.D. Planning & Development Services
% Jim Bennet
5510 Overland Ave, Suite 310
San Diego, CA 92123

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C/O: Jim Bennet
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Ref: Groundwater Sustainability Plan
Borrego Valley Groundwater Basin
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*Warmest Regards,
Nathan Davidson
P.O. Box 1639
Borrego Springs, CA 92004*

*760.767.0145
LJHIBISCUS2@AOL.COM*



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5310 Overland Ave, Ste. 310
San Diego, CA 92123*

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C/O: Jim Bennet
5510 Overland Avenue, Suite 310
San Diego, CA 92123

May 14, 2019

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Sincerely,

Linda A. Roller Linda A. Roller
PO Box 2368
Borrego Springs, CA 92004



Linda Roller
PO Box 2368
Borrego Spgs., CA 92004

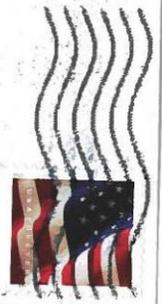
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San Diego, CA 92123

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John and Mary Delaney
P. O. Box 2537
Borrego Springs, CA 92004

May 16, 2019

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

*Mr. Bennett,
Thank you for listening to
our concerns. We're counting
on you to save our town
and the Park.*

Ref: Groundwater Sustainability Plan
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Borrego Springs Sub-basin

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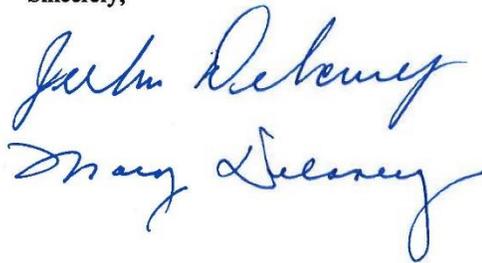
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Sincerely,



Justin DeBoney
Mary DeBoney

John and Mary Delaney
P. O. Box 2537
Borrego Springs, CA 92004

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Jim Bennett

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Planning & Development Services
C/O: Jim Bennet
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San Diego, CA 92123

May 14, 2019

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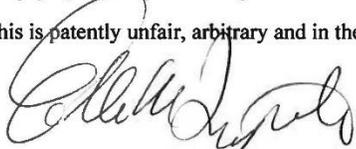
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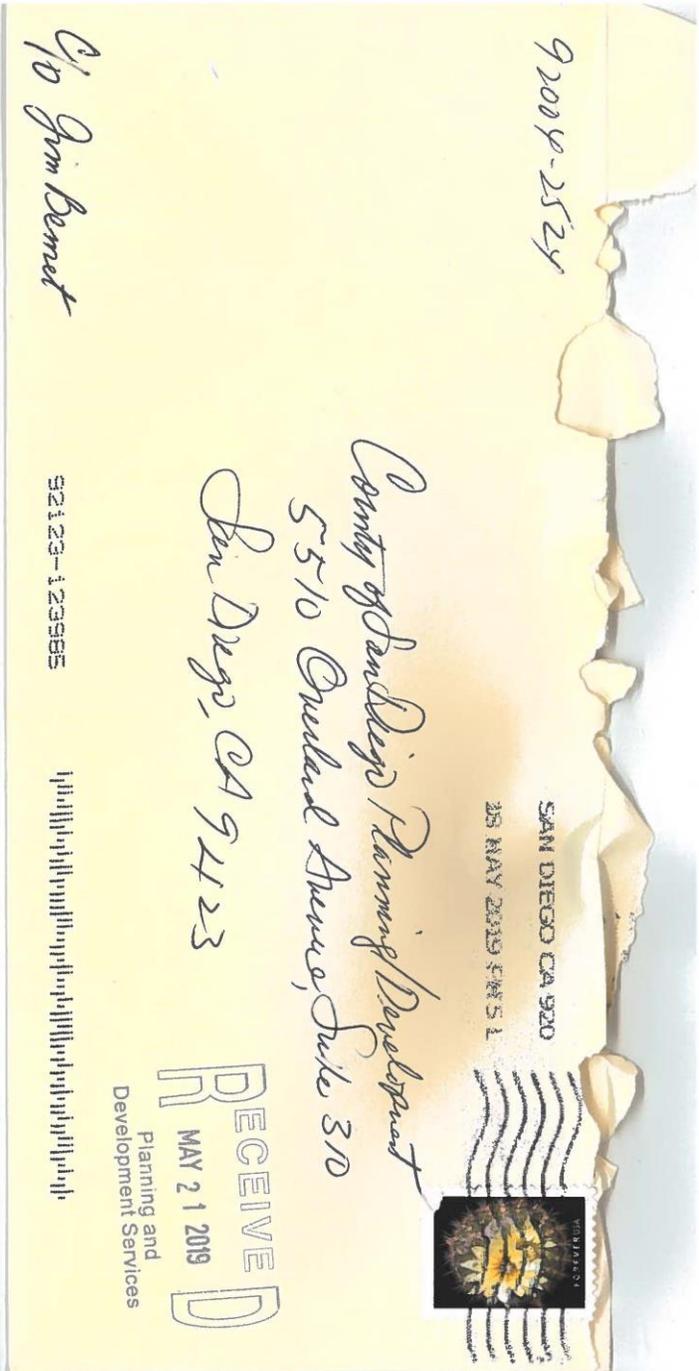
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Ellen Fitzpatrick
3457 Broken Arrow Rd, BS, CA 92021-2524



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

May 14, 2019

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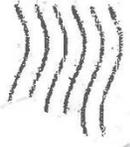
Michael L. Wells

Borrego Springs, CA



Michael Wells
PO Box 298
Borrego Springs, CA 92004

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c/o Jim Bennett
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San Diego, CA 92123

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

May 14, 2019

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Borrego Valley Groundwater Basin
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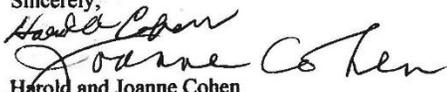
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Thus, choosing 2010-2015 as the baseline years to determine BPAs is clearly to the detriment of the ratepayer, and unquestionably favors farmers first, and golf courses next.

This is patently unfair, arbitrary and in the big picture, manipulative and probably illicit.

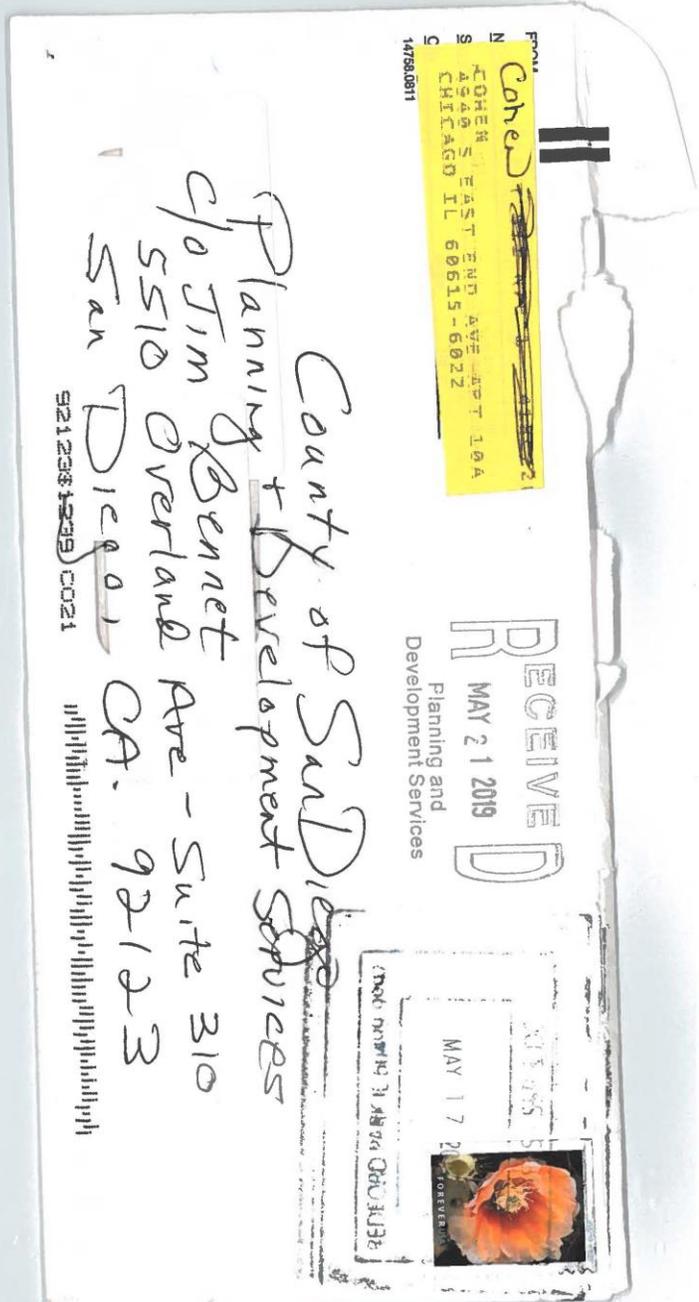
Sincerely,



Harold and Joanne Cohen

618 Tilting T Drive

Borrego Springs, California 92004



May 15, 2019

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

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

Dear Mr. Bennett;

The aquifer that serves Borrego Springs has been in overdraft for decades and **classifies as critical overdraft today**. While residents have responded to this crisis by cutting back water use by over 50% in the past 40 years, agriculture has responded by drilling deeper wells and expanding. The net result is a water table that has already dropped over 100 feet and drops an additional 1-2 feet per year.

Borrego Springs is also in an uncomfortably unique situation in California: due to our geographic isolation we are not able to import water from elsewhere in the state. The aquifer that serves our community is our only source of water and it is in a 70% overdraft situation. Of the water removed from our aquifer annually, agriculture pumps 70%, golf courses pump 20% and residential and business rate-payers in Borrego use the remaining 10% of the total

As a Borrego Springs homeowner who is committed to the rehabilitation of our aquifer, I ask you to support the four objectives toward water sustainability stated by the Borrego Springs Water District Ratepayers for the Groundwater Sustainability Plan (GSP) under SGMA (Sustainable Water Management Act). This plan is currently under public review:

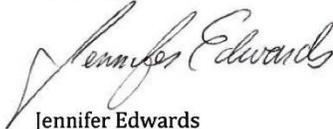
1. BWD Ratepayers should be allocated an initial minimum of 1700 AFY. This total represents an over 50% decrease in our historical average, a result of significant conservation efforts that are already in place. This allocation (1700 AFY) should be excluded from any reductions.
2. The 20-year implementation period set out in our GSP should be shortened significantly or planned reductions should be front-loaded. Straight-line reductions over a 20 year period will result in a greatly lowered aquifer, costlier water pumping and water of poorer quality.
3. Water quality is an essential concern, it should be addressed immediately, and if/when water quality issues are determined the parties responsible must be held to account for any remediation that might be necessary.
4. Groundwater Dependent Ecosystems must be considered in the overall water allocation calculus and timing of reductions. Water set-asides for GDEs are meaningless if the "set-aside water" sits in a drastically reduced water table, unavailable to the ecosystems it is intended to support.

Finally, BPAs are arguably one of the most important elements in the implementation process: witness the ongoing battle among stakeholders to establish the highest BPA possible. For reasons unclear to us, the ratepayers, the timeframe set out in the GSP - 2010 to the end of 2014 - is certainly the worst possible interval for BWD. BWD began reducing its usage in 2003, when it pumped 3926 AF. In 2010, BWD pumped 2730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1700.

During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 AF. These figures are a clear indicator that the parties responsible for the overdraft were pumpers other than BWD: 70% due to farming, 20% due to recreation/golf courses.

Thus, choosing 2010-2015 as the baseline years to determine BPAs is clearly to the detriment of the ratepayer, and unquestionably favors farmers first, and golf courses next.

Sincerely,



Jennifer Edwards
P.O. Box 1858
312 Ocotillo Circle
Borrego Springs, CA 92004
superflute@gmail.com

D. Edwards
PO Box 1858
Borrego Springs, CA
92004

County of San Diego
Planning & Development Services
5510 Overland Avenue, Ste 310
San Diego, CA
92123
Attn: Tim Bennett

92123-12385



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Planning and
Development Services

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

May 14, 2019

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

Dear Mr. Bennett;

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

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

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

Finally, BPAs are arguably one of the most important elements in the implementation process: witness the ongoing battle among stakeholders to establish the highest BPA possible. For reasons unclear to us, the ratepayers, the timeframe set out in the GSP – 2010 to the end of 2014 – is certainly the worst possible interval for BWD. BWD began reducing its usage in 2003, when it pumped 3926 AF. In 2010, BWD pumped 2730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1700.

During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 AF. These figures are a clear indicator that the parties responsible for the overdraft were pumpers other than BWD: 70% due to farming, 20% due to recreation/golf courses.

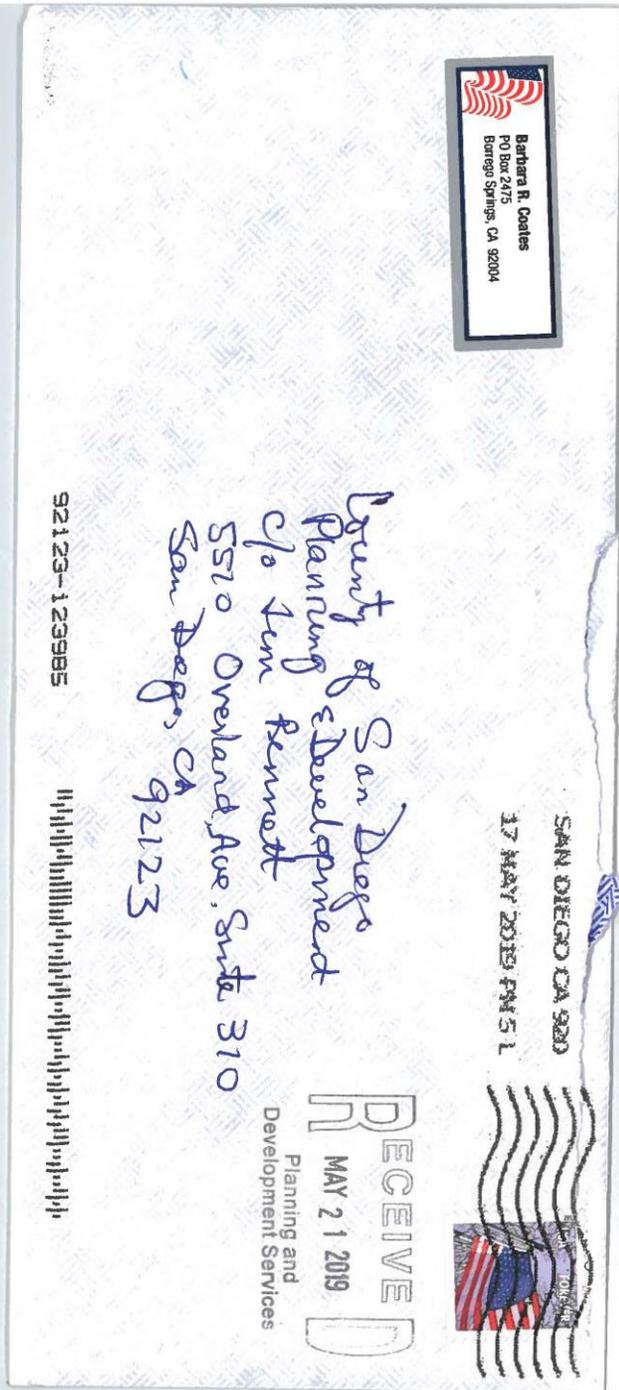
Thus, choosing 2010-2015 as the baseline years to determine BPAs is clearly to the detriment of the ratepayer, and unquestionably favors farmers first, and golf courses next.

This is patently unfair, arbitrary and in the big picture, manipulative and probably illicit.

Thank you so much for your unrelenting efforts over these last few years. The GSP for the Borrego Basin is truly a benchmark piece of work that has laid the groundwork for all future efforts towards implementing the sustainable use the groundwater in our valley.

Best regards,

Barbara Coates
PO Box 2475
Borrego Springs, CA
92004



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

May 14, 2019

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

Dear Mr. Bennett;

I am a year-round resident of Borrego Springs, and I really appreciate your hard and long work in crafting the GSP. I would like to share with you some of my main concerns for our town. Water, water, and water!

The Borrego Valley aquifer has been drastically over-drafted for many years. We must comply with state law, the California Groundwater Sustainability Act, and come into compliance by 2040. Current and historic water use in the basin has been as follows:

- Municipal pumpers (Borrego Water District) - 10%
- Recreational pumpers (Golf courses) - 20%
- Agricultural pumpers (Citrus, palm trees, herb and vegetable farms) - 70%

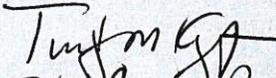
The current Groundwater Sustainability Plan (GSP) seems to recommend an across the board reduction of 74%, which would maintain the current distribution percentages. The residential water use has already been cut from a reported historic high of 3500 acre feet/year to the current level of 1700 acre feet/year, a cut of 50%. Our community has done this through the conscious effort of removing fountains and swimming pools, grass and water intensive landscaping, and converting to low-flow toilets.

The recreational and agricultural users have been slow or completely unwilling to make similar reductions, continuing to deplete our aquifer. Clearly the major contributor to the aquifer overdraft has been and continues to be agriculture. Although agriculture has been an important part of our community, it is unreasonable to assume that farming should continue to use 70% of the allocated water.

Therefore, we have identified some objectives that must be included in the implementation of the Groundwater Sustainability Plan.

- The municipal allotment should be no less than the 1700 acre feet/year which is currently being used by the BWD. This is our only source of drinking water, which should be a priority for our community. This would allow for some limited growth of homes and businesses.
- We believe that sustainability should be achieved sooner than the mandated 20 year period. The sooner we can become sustainable, the better chance we have to maintain the water quality of our aquifer. This will also have a beneficial impact on some of the endangered ecosystems in the basin.

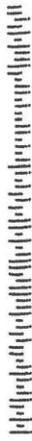
I look forward to hearing from you.


3446 Laurel Rd X 625
Borrego Springs, Ca 92004

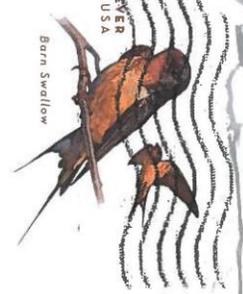


County of San Diego
Planning & Development Services
c/o Jim Berner
5510 Overland Ave #310
San Diego CA 92123

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Planning and
Development Services

County of San Diego
 Planning & Development Services
 c/o Mr. Jim Bennett
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

May 17, 2019

EXPRESS U. S. MAIL

Re: Borrego Springs Groundwater Sustainability Plan

Dear Mr. Bennett:

I have been a Borrego Springs snowbird and BWD ratepayer for 30 years. I have a small home at Rams Hill. Though I appreciate and use the golf courses in Borrego, including the ones Rams Hill and Borrego Springs Resort, I am concerned about the water overdraft caused primarily by extensive citrus farming and golfing in Borrego.

We ratepayers have reduced our use over the last 10 years from some 2700 acre feet/year to 1700 acre feet/year and in the process have seen their water bills increase three times! I have served on the board of my neighborhood association during the same period of time, and our neighborhood association has gone to great effort to significantly reduce landscaping water use. **Neither agriculture nor golf courses have significantly reduced their water usage.**

Change is hard but we must all work together as a community to save Borrego Springs. I attended as many of the ratepayer meetings as I could when I was in Borrego this year. I agree completely with the four well stated and well documented concerns, beliefs and objectives of the group led by Gary Haldeman:

- BWD/Ratepayers should be allocated an initial minimum of 1700 AFY; this allocation should be excluded from any further reductions.
- The 20-year implementation period set out under SGMA should be shortened.
- Water quality should be addressed immediately, and if/when water quality issues are determined, the parties responsible are held to account for any remediation that might be necessary.
- GDEs must be considered in the overall water allocation calculus.

BPA's are one of the most important elements in the implementation process. The timeframe in the GSP – 2010 to the end of 2014 – is the worst possible interval for BWD ratepayers. BWD began reducing its usage in 2003, when it pumped 3926 AF and has responsibly reduced its water usage to 1700 now. During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 AF. The only conclusion possible is that farms and golf courses are responsible for the overdraft. **Thus, choosing 2010-2015 as the baseline years to determine unquestionably favors farmers and golf courses over the ratepayers and is patently unfair, arbitrary and manipulative.**

I respectfully request that:

- **BWD/Ratepayers be allocated an initial minimum of 1700 AFY and that this allocation not be further reduced**
- **The 20-year implementation period be shortened**
- **Water quality be addressed immediately**
- **Consideration be given to GDEs in the overall water allocation.**

Sincerely,



Mary Susan Leahy
 9 McKinley Street
 Concord, New Hampshire 03301-2700

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

May 15, 2019

Ref: Groundwater Sustainability Plan, Borrego Valley Groundwater Basin, Borrego Springs Sub-basin

Dear Mr. Bennett;

I am a 40-year, year-round resident, homeowner, and manager of a business and employer in Borrego Springs. I thank you for your excellent, hard work in crafting the GSP. I would like to share with you some of my main concerns for our town related to water.

The Borrego Valley aquifer has been drastically over-drafted for many years. We must comply with state law, the California Groundwater Sustainability Act, and come into compliance by 2040. Current and historic water use in the basin has been as follows:

- Municipal pumpers (Borrego Water District) - 10%
- Recreational pumpers (Golf courses) - 20%
- Agricultural pumpers (Citrus, palm trees, herb and vegetable farms) - 70%

The current Groundwater Sustainability Plan (GSP) seems to recommend an across the board reduction of 74%, which would maintain the current distribution percentages. The residential water use has already been cut from a reported historic high of 3,500 acre feet/year to the current level of 1,700 acre feet/year, a cut of 50%. Our community has done this through the conscious effort of removing fountains and swimming pools, grass and water intensive landscaping, and converting to low-flow toilets.

The recreational and agricultural users have been slow or completely unwilling to make similar reductions, continuing to deplete our aquifer. Clearly the major contributor to the aquifer overdraft has been and continues to be agriculture. Although agriculture has been an important part of our community, it is unreasonable to assume that farming should continue to use 70% of the allocated water.

Therefore, we have identified some objectives that must be included in the implementation of the GSP:

- The municipal allotment should be *no less than* the 1,700 acre feet/year, which is currently being used by the BWD. This is our only source of drinking water, which should be a priority for our community. This would allow for some limited growth of homes and businesses.
- We believe that sustainability should be achieved sooner than the mandated 20 year period. The sooner we can become sustainable, the better chance we have to maintain the water quality of our aquifer. This will also have a beneficial impact on some of the endangered ecosystems in the basin.

Finally, BPAs are arguably one of the most important elements in the implementation process: witness the ongoing battle among stakeholders to establish the highest BPA possible. For reasons unclear to us, the ratepayers, the timeframe set out in the GSP, 2010 to the end of 2014, is certainly the worst possible interval for BWD. BWD began reducing its usage in 2003, when it pumped 3,926 AF. In 2010, BWD pumped 2,730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1,700 AF.

During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 AF. These figures are a clear indicator that the parties responsible for the overdraft were pumpers other than BWD: 70% due to farming, 20% due to recreation/golf courses.

Thus, choosing 2010-2015 as the baseline years to determine BPAs is clearly to the detriment of the ratepayer, and unquestionably favors farmers first and golf courses next. This is patently unfair, arbitrary and in the big picture, manipulative and probably illicit. Thank you for your attention. I look forward to hearing from you.

Sincerely,



Betsy Knaak, P.O. Box 2021, Borrego Springs, CA 92004-2021 * 760-767-4808 * betsyknaak@gmail.com

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

May 14, 2019

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

Dear Mr. Bennett;

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

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

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

Thank you so much for your unrelenting efforts over these last few years. The GSP for the Borrego Basin is truly a benchmark piece of work that has laid the groundwork for all future efforts towards implementing the sustainable use the groundwater in our valley.

Best regards,

Senja Dunlap Ditz
PO Box 86

*Borrego Springs CA
92004*

*As a 12 year resident of Borrego and director of Borrego
Art Institute Pottery Program I see our community as
art-rich and a draw for residents and Southern
California tourists. We cannot lose this surprising place.*

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

May 14, 2019

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

Dear Mr. Bennett;

I am a year-round resident of Borrego Springs. I really appreciate your work in crafting the GSP. I would like to share with you some of my main concerns for our town.

As you know, the Borrego Valley aquifer has been drastically over-drafted for many years. We must comply with state law, the California Groundwater Sustainability Act, and come into compliance by 2040. Current and historic water use in the basin has been as follows:

- Municipal pumpers (Borrego Water District) - 10%
- Recreational pumpers (Golf courses) - 20%
- Agricultural pumpers (Citrus, palm trees, herb and vegetable farms) - 70%

The current Groundwater Sustainability Plan (GSP) seems to recommend an across the board reduction of 74%, which would maintain the current distribution percentages. The residential water use has already been cut from a reported historic high of 3500 acre feet/year to the current level of 1700 acre feet/year, a cut of 50%. Our community has done this through the conscious effort of removing fountains and swimming pools, grass and water intensive landscaping, converting to low-flow toilets, and being constantly mindful of water use in every way.

The recreational and agricultural users have been slow or completely unwilling to make similar reductions, continuing to deplete our aquifer. Clearly the major contributor to the aquifer overdraft has been and continues to be agriculture. Although agriculture has been an important part of our community, it is unreasonable to assume that farming should continue to use 70% of the allocated water. I have recently noticed that agriculture seems to be expanding around town. There are new multi-acre plantings of herbs and flowers that require water where previously there was just open land.

Therefore, it's my belief that the following objectives must be included in the implementation of the Groundwater Sustainability Plan.

- The municipal allotment should be no less than the 1700 acre feet/year which is currently being used by the BWD. This is our only source of drinking water, which should be a priority for our community. The municipal users have already reduced consumption to an almost painful level.
- We believe that sustainability should be achieved sooner than the mandated 20 year period. The sooner we can become sustainable, the better chance we have to maintain the water quality of our aquifer. This will also have a beneficial impact on some of the endangered ecosystems in the basin.

Finally, BPAs are arguably one of the most important elements in the implementation process: witness the ongoing battle among stakeholders to establish the highest RPA possible. For reasons unclear to us, the

interval for BWD. BWD began reducing its usage in 2003, when it pumped 3926 AF. In 2010, BWD pumped 2730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1700.

During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 AF. These figures are a clear indicator that the parties responsible for the overdraft were pumpers other than BWD: 70% due to farming, 20% due to recreation/golf courses. Thus, choosing 2010-2015 as the baseline years to determine BPAs is clearly to the detriment of the ratepayer, and unquestionably favors farmers first, and golf courses next. This is patently unfair, arbitrary and manipulative. Please consider using an earlier timeframe for the baseline years to determine BPAs.

Thank you for considering my input.

Sincerely,

Charlene Aron



437 Pointing Rock Dr., POB 1682

Borrego Springs CA 92004

Charlene Aron
PO Box 1682
Borrego Spgs, CA 92004

County of San Diego
Planning & Development Services
c/o Tim Bennett
5510 Overland Av, Suite 310
San Diego CA 92123

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Development Services

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

May 19, 2019

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

Dear Mr. Bennett;

At one time, many decades ago, it was believed that Borrego Springs had an unlimited water supply. With that false belief and extensive advertising came numerous agricultural farms, golf courses and, of course, residents to Borrego Springs.

Through modern day monitoring and measuring, unfortunately, we have determined the Borrego Springs ground water supply has dropped drastically and alarmingly the past 30 years. Although the residents use 10% of the water supply, agriculture uses 70% and golf courses use 20%.

The resident/ratepayers have buckled down and reduced their use over the last 10 years from some 2700 acre feet/year to 1700 acre feet/year and in the process have seen their water bills increase three times! Distressingly, agriculture has not significantly reduced their water usage nor have the golf courses.

Change is hard but we must all work together as a community to save the town of Borrego Springs. Following are our four main concerns, beliefs and objectives:

- We believe that BWD/Ratepayers should be allocated an initial minimum of 1700 AFY; this allocation should be excluded from any further reductions.
- We believe that the 20-year implementation period set out under SGMA should be shortened.
- We believe that water quality is an essential concern, it should be addressed immediately, and if/when water quality issues are determined, the parties responsible are held to account for any remediation that might be necessary.
- We believe that the GDEs (Groundwater Dependent Ecosystems) must be considered in the overall water allocation calculus.

Finally, BPAs are arguably one of the most important elements in the implementation process: witness the ongoing battle among stakeholders to establish the highest BPA possible. For reasons unclear to us, the ratepayers, the timeframe set out in the GSP – 2010 to the end of 2014 – is certainly the worst possible interval for BWD. BWD began reducing its usage in 2003, when it pumped

3926 AF. In 2010, BWD pumped 2730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1700. During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 AF. These figures are a clear indicator that the parties responsible for the overdraft were pumpers other than BWD: 70% due to farming, 20% due to recreation/golf courses.

Thus, choosing 2010-2015 as the baseline years to determine BPAs is clearly to the detriment of the ratepayer, and unquestionably favors farmers first, and golf courses next.

Thank you for the opportunity to provide input into this extremely important issue. As a resident of Borrego Springs I hope for the implementation of a plan that will be fair to its residents and sensitive to the environmental needs of this unique and spectacular area.

Sincerely,



Sandy Jorgensen-Funk
2826 Back Nine Dr.
Borrego Springs, CA 92004
Sandyfunk@cox.net

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

May 14, 2019

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

Dear Mr. Bennett;

The aquifer that serves Borrego Springs has been in overdraft for decades and classifies as critical overdraft today. While residents have responded to this crisis by cutting back water use by over 50% in the past 40 years, agriculture has responded by drilling deeper wells and expanding. The net result is a water table that has already dropped over 100 feet and drops an additional 1-2 feet per year.

Borrego Springs is also in an uncomfortably unique situation in California: due to our geographic isolation we are not able to import water from elsewhere in the state. The aquifer that serves our community is our only source of water and it is in a 70% overdraft situation. Of the water removed from our aquifer annually, agriculture pumps 70%, golf courses pump 20% and residential and business rate-payers in Borrego use the remaining 10% of the total

As a Borrego Springs homeowner, I ask you to support the four objectives toward water sustainability stated by the Borrego Springs Water District Ratepayers for the Groundwater Sustainability Plan (GSP) under SGMA (Sustainable Water Management Act). This plan is currently under public review:

1. BWD Ratepayers should be allocated an initial minimum of 1700 AFY. This total represents an over 50% decrease in our historical average, a result of significant conservation efforts that are already in place. This allocation (1700 AFY) should be excluded from any reductions.
2. The 20-year implementation period set out in our GSP should be shortened significantly or planned reductions should be front-loaded. Straight-line reductions over a 20 year period will result in a greatly lowered aquifer, costlier water pumping and water of poorer quality.
3. Water quality is an essential concern, it should be addressed immediately, and if/when water quality issues are determined the parties responsible must be held to account for any remediation that might be necessary.
4. Groundwater Dependent Ecosystems must be considered in the overall water allocation calculus and timing of reductions. Water set-asides for GDEs are meaningless if the "set-aside water" sits in a drastically reduced water table, unavailable to the ecosystems it is intended to support.

Finally, BPAs are arguably one of the most important elements in the implementation process: witness the ongoing battle among stakeholders to establish the highest BPA possible. For reasons unclear to us, the ratepayers, the timeframe set out in the GSP – 2010 to the end of 2014 – is certainly the worst possible interval for BWD. BWD began reducing its usage in 2003, when it pumped 3926 AF. In 2010, BWD pumped 2730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1700.

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Thus, choosing 2010-2015 as the baseline years to determine BPAs is clearly to the detriment of the ratepayer, and unquestionably favors farmers first, and golf courses next.

This is patently unfair, arbitrary and in the big picture, manipulative and probably illicit.

Thank you for your consideration,

Sally Theriault

Sally Theriault

PO Box 1434

(3076 Broken Arrow Road)

Borrego Springs, CA 92004-1434

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

May 14, 2019

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

Dear Mr. Bennett;

At one time, many decades ago, it was believed that Borrego Springs had an unlimited water supply. With that false belief and extensive advertising came numerous agricultural farms, golf courses and, of course, residents to Borrego Springs.

Through modern day monitoring and measuring, unfortunately, we have determined the Borrego Springs ground water supply has dropped drastically and alarmingly the past 30 years. Although the residents use 10% of the water supply, agriculture uses 70% and golf courses use 20%.

The resident/ratepayers have buckled down and reduced their use over the last 10 years from some 2700 acre feet/year to 1700 acre feet/year and in the process have seen their water bills increase three times! Distressingly, agriculture has not significantly reduced their water usage nor have the golf courses.

Change is hard but we must all work together as a community to save the town of Borrego Springs. Following are our four main concerns, beliefs and objectives:

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This is patently unfair, arbitrary and in the big picture, manipulative and probably illicit.

My family and I have been full-time residents in Borrego Springs for many years, and purchased our home in 1994. As a visitor since the 60's, I have noticed the mesquite forest in the lower valley fail, while mesquite in surrounding areas have not — my conclusion is the cause is the dropping water table. Farmers were originally striking water at a depth of 30' according to historical accounts.

Reduction in water usage by residents would have little impact on the problem, and it certainly seems that the greater impact should be shouldered by the big water users — primarily agriculture. If they do not significantly reduce water consumption, first the town of Borrego Springs will die, and then agriculture will follow. We must not allow this to happen!

Bob Theriault

ROBERT THERIAULT
PO BOX 1434 / 3076 BROKEN ARROW RD
BORREGO SPRINGS, CA 92004

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

May 14, 2019

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

Dear Mr. Bennett;

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

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- We strongly believe that a 20-year implementation period is much too long. Our aquifer has already dropped dramatically over the last 30 years. Prolonging this implementation can only affect the quality of our water and the cost of its extraction.
- The valley's native flora and fauna communities have been severely affected as a result of the long-term overdraft of the basin. In order to preserve the remaining ecosystems, two things must happen: first, there must be a set-aside for them; and second, the implementation period must be drastically shortened so as to ensure the survival of the remaining communities.

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

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Thank you so much for your unrelenting efforts over these last few years. The GSP for the Borrego Basin is truly a benchmark piece of work that has laid the groundwork for all future efforts towards implementing the sustainable use the groundwater in our valley.

Best regards,

Merrill Smith
1010 Palm Canyon #151
B.S. CA 92004

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

May 14, 2019

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Linda Mecceri
 1968 Desert Vista Terrace, Ramona Hill

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Best regards,

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

May 14, 2019

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

Dear Mr. Bennett;

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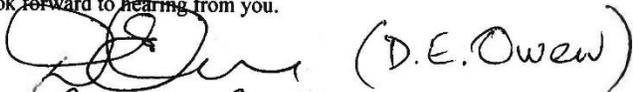
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The recreational and agricultural users have been slow or completely unwilling to make similar reductions, continuing to deplete our aquifer. Clearly the major contributor to the aquifer overdraft has been and continues to be agriculture. Although agriculture has been an important part of our community, it is unreasonable to assume that farming should continue to use 70% of the allocated water.

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I look forward to hearing from you.

 (D.E. Owen)
 (R.A. OWEN) 5-25-2019

D.R. Owen
P.O. Box 1666
Borrego Springs
CA 92004

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MAY 30 2019
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Development Services

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28 MAY 2019 PM 2:09
BORREGO SPRINGS
USA



County of San Diego
Planning & Development Services,
c/o Jim Benet
550 Diekland Avenue, Suite 30
San Diego, CA 92123



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

May 19, 2019

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

Dear Mr. Bennett;

At one time, many decades ago, it was believed that Borrego Springs had an unlimited water supply. With that false belief and extensive advertising came numerous agricultural farms, golf courses and, of course, residents to Borrego Springs.

Through modern day monitoring and measuring, unfortunately, we have determined the Borrego Springs ground water supply has dropped drastically and alarmingly the past 30 years. Although the residents use 10% of the water supply, agriculture uses 70% and golf courses use 20%.

The resident/ratepayers have buckled down and reduced their use over the last 10 years from some 2700 acre feet/year to 1700 acre feet/year and in the process have seen their water bills increase three times! Distressingly, agriculture has not significantly reduced their water usage nor have the golf courses.

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Sincerely,



Gary Funk
2826 Back Nine Dr.
Borrego Springs, CA 92004
Sandyfunk@cox.net

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

May 14, 2019

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 Borrego Valley Groundwater Basin
 Borrego Springs Sub-basin

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Best regards,

Linda Mc Bride
1010 Palm Canyon Dr #339
POB 1863
B.S., CA 92004
760-767-3547

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

May 14, 2019

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Borrego Valley Groundwater Basin
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Jeanne Gemmel
1010 Palm Canyon # 149
Borrego Springs 92004

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

May 14, 2019



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Best regards,

Civil Weaver

Cyril Weaver

P.O. Box 2469

Borrego Springs

Ca 92004

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

May 14, 2019

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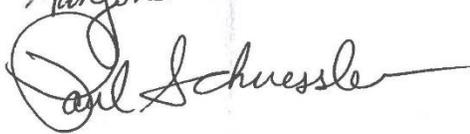
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Manjorie Schuessler


PO Box 1013
Borrego Springs, CA 92004
760-668-5267
phrog47@gmail.com

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

May 14, 2019

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

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The recreational and agricultural users have been slow or completely unwilling to make similar reductions, continuing to deplete our aquifer. Clearly the major contributor to the aquifer overdraft has been and continues to be agriculture. Although agriculture has been an important part of our community, it is unreasonable to assume that farming should continue to use 70% of the allocated water. I have recently noticed that agriculture seems to be expanding around town. There are new multi-acre plantings of herbs and flowers that require water where previously there was just open land.

Therefore, it's my belief that the following objectives must be included in the implementation of the Groundwater Sustainability Plan.

- The municipal allotment should be no less than the 1700 acre feet/year which is currently being used by the BWD. This is our only source of drinking water, which should be a priority for our community. The municipal users have already reduced consumption to an almost painful level.
- We believe that sustainability should be achieved sooner than the mandated 20 year period. The sooner we can become sustainable, the better chance we have to maintain the water quality of our aquifer. This will also have a beneficial impact on some of the endangered ecosystems in the basin.

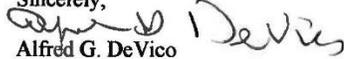
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Thank you for considering my input.

Sincerely,


Alfred G. DeVico

437 Pointing Rock Dr., POB 1682

Borrego Springs CA 92004

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

May 14, 2019

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 Borrego Springs Sub-basin

Dear Mr. Bennett;

I am a year-round resident of Borrego Springs, and I really appreciate your hard and long work in crafting the GSP. I would like to share with you some of my main concerns for our town. Water, water, and water!

The Borrego Valley aquifer has been drastically over-drafted for many years. We must comply with state law, the California Groundwater Sustainability Act, and come into compliance by 2040. Current and historic water use in the basin has been as follows:

- Municipal pumpers (Borrego Water District) - 10%
- Recreational pumpers (Golf courses) - 20%
- Agricultural pumpers (Citrus, palm trees, herb and vegetable farms) - 70%

The current Groundwater Sustainability Plan (GSP) seems to recommend an across the board reduction of 74%, which would maintain the current distribution percentages. The residential water use has already been cut from a reported historic high of 3500 acre feet/year to the current level of 1700 acre feet/year, a cut of 50%. Our community has done this through the conscious effort of removing fountains and swimming pools, grass and water intensive landscaping, and converting to low-flow toilets.

The recreational and agricultural users have been slow or completely unwilling to make similar reductions, continuing to deplete our aquifer. Clearly the major contributor to the aquifer overdraft has been and continues to be agriculture. Although agriculture has been an important part of our community, it is unreasonable to assume that farming should continue to use 70% of the allocated water.

Therefore, we have identified some objectives that must be included in the implementation of the Groundwater Sustainability Plan.

- The municipal allotment should be no less than the 1700 acre feet/year which is currently being used by the BWD. This is our only source of drinking water, which should be a priority for our community. This would allow for some limited growth of homes and businesses.
- We believe that sustainability should be achieved sooner than the mandated 20 year period. The sooner we can become sustainable, the better chance we have to maintain the water quality of our aquifer. This will also have a beneficial impact on some of the endangered ecosystems in the basin.

Finally, BPAs are arguably one of the most important elements in the implementation process: witness the ongoing battle among stakeholders to establish the highest BPA possible. For reasons unclear to us, the ratepayers, the timeframe set out in the GSP – 2010 to the end of 2014 – is certainly the worst possible interval for BWD. BWD began reducing its usage in 2003, when it pumped 3926 AF. In 2010, BWD pumped 2730.50 AF, and since then it has continued to responsibly reduce its water usage such that currently it pumps 1700.

During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 AF. These figures are a clear indicator that the parties responsible for the overdraft were pumpers other than BWD: 70% due to farming, 20% due to recreation/golf courses. Thus, choosing 2010-2015 as the baseline years to determine BPAs is clearly to the detriment of the

ratepayer, and unquestionably favors farmers first, and golf courses next.
This is patently unfair, arbitrary and in the big picture, manipulative and probably illicit.

I look forward to hearing from you.

Liesel Paris
P.O. 2469
Borrego Springs
Ca 92004

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

May 14, 2019

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

Dear Mr. Bennett;

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

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

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

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Sal Noceri
1968 Desert Vista Terrace
Dunsmuir Hill

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

May 14, 2019

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

Dear Mr. Bennett;

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Through modern day monitoring and measuring, unfortunately, we have determined the Borrego Springs ground water supply has dropped drastically and alarmingly the past 30 years. Although the residents use 10% of the water supply, agriculture uses 70% and golf courses use 20%.

The resident/ratepayers have buckled down and reduced their use over the last 10 years from some 2700 acre feet/year to 1700 acre feet/year and in the process have seen their water bills increase three times! Distressingly, agriculture has not significantly reduced their water usage nor have the golf courses.

Change is hard but we must all work together as a community to save the town of Borrego Springs. Following are our four main concerns, beliefs and objectives:

- We believe that BWD/Ratepayers should be allocated an initial minimum of 1700 AFY; this allocation should be excluded from any **further** reductions.
- We believe that the 20-year implementation period set out under SGMA should be shortened.
- We believe that water quality is an essential concern, it should be addressed immediately, and if/when water quality issues are determined, the parties responsible are held to account for any remediation that might be necessary.
- We believe that the GDEs (Groundwater Dependent Ecosystems) must be considered in the overall water allocation calculus.

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Heidi H. Noyes Full-time resident since '91
HEIDI H. NOYES mailing=
3252 East Star Rd. (P.O. Box 1080)
Borrego Spgs, CA 92004

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

May 14, 2019

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

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- The valley's native flora and fauna communities have been severely affected as a result of the long-term overdraft of the basin. In order to preserve the remaining ecosystems, two things must happen: first, there must be a set-aside for them; and second, the implementation period must be drastically shortened so as to ensure the survival of the remaining communities.

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Thank you so much for your unrelenting efforts over these last few years. The GSP for the Borrego Basin is truly a benchmark piece of work that has laid the groundwork for all future efforts towards implementing the sustainable use the groundwater in our valley.

Best regards,

Robyn Montgomery
P.O. 2471
Borrego Springs
Ca 92021-2469



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

May 14, 2019

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

Dear Mr. Bennett;

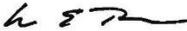
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Best regards,


William E. Bennet

William Bonnell
Box 2566
Borrego Springs, CA
92004

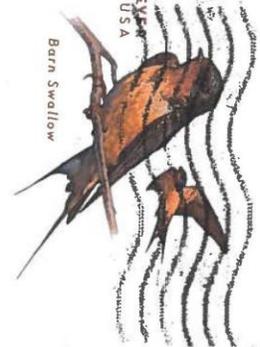
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MAY 28 2019
Planning and
Development Services

County of San Diego
Planning & Development
c/o Tom Bennett
5510 Oldmans Ave Suite 310
San Diego, CA 92123

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22 MAY 2019 PM 5:11
FOREIGN
USA



James Rickard
PO Box 777, 737 San Pablo Rd
Borrego Springs CA 92004

May 17, 2019

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

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

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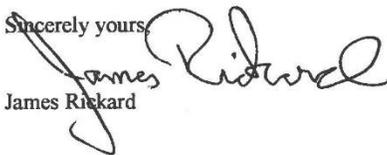
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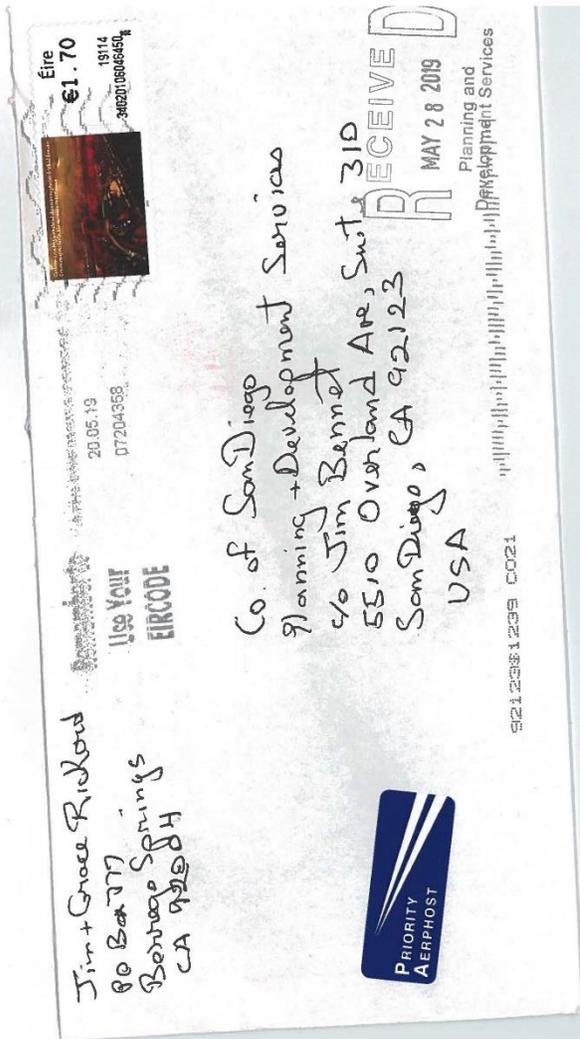
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Sincerely yours,

James Rickard





Grace Rickard
PO Box 777, 737 San Pablo Rd
Borrego Springs CA 92004

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

May 17, 2019

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

Dear Mr. Bennett;

We have a problem that needs your immediate attention. It's the water.

We are in dire need of a solution to our "critical overdraft" situation. You will learn quickly, if you don't already know, that agriculture, specifically, the Farmers, are depleting our aquifer at an unsustainable rate by irrigating their non-native citrus and palm orchards. They consume over 70% of the aquifer.

We, the ratepaying residents and businesses consume only 10%. Both residents and businesses have reduced consumption, in good faith, while the farmers have continued to install larger irrigation pipes and drill deeper down, thereby increasing their consumption. They are taking the amount that we have earnestly tried to preserve.

Agriculture was established in Borrego Springs before the town. They own the rights to the water. The town has grown as the agriculture has grown. There are now more people than orchards. People are more important than grapefruits.

Borrego Springs is a dazzling gem in this desert. We are a community of artists, anthropologists, archeologists, astronomers, paleontologists, naturalists, botanists, hikers, bikers, outdoor enthusiasts, all inspired by the endless wonder this desert provides.

Please consider deeply and act swiftly to find a solution to keep us from becoming a deserted dried up desert ghost town. There is too much to lose.

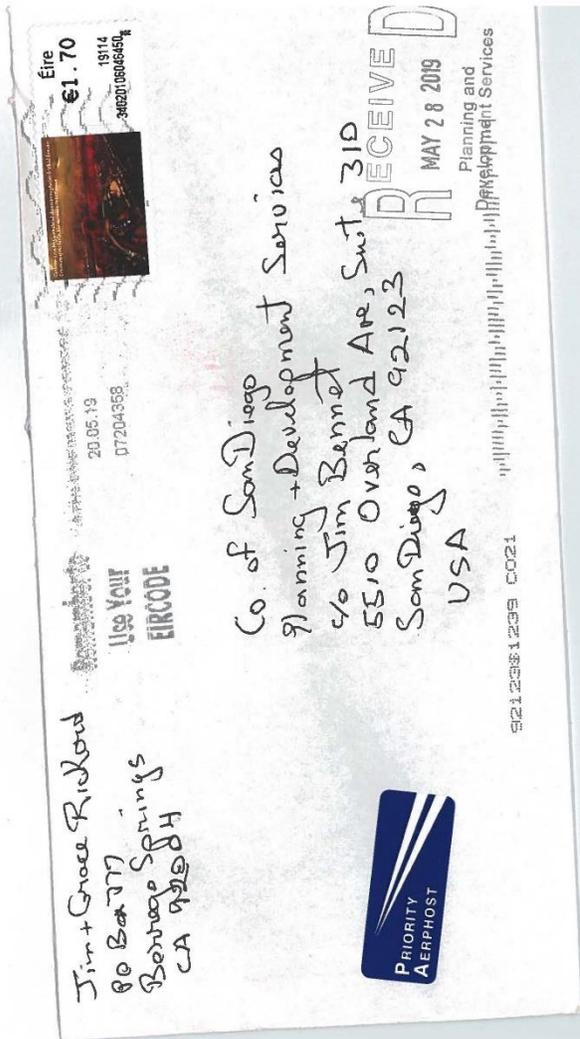
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Sincerely,
Grace Rickard





Letter I47 – I89

Commenter: Borrego Water District Ratepayers

Date: Various

The Groundwater Sustainability Agency (GSA) acknowledges 43 comment letters submitted by the Borrego Water District ratepayers.

The GSA has summarized the comment letters with the following underlined comments followed by GSA responses:

Comment 1: The Borrego Water District should not be subject to reductions below 1,700 acre-feet per year. While the Groundwater Sustainability Plan (GSP) does not set specific groundwater use reductions, the GSP includes Project and Management Action (PMA) No. 3 – Pumping Reduction Program. As indicated in the GSP, the GSA will prepare the 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 is a possible scenario where groundwater use reductions and a specific ramp down schedule could be developed.

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

Comment 2: The GSP implementation timeline should be shortened significantly or planned reductions should be front loaded. While the GSP does not set specific groundwater use reductions or rampdown schedule, the GSP includes PMA 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 is a possible scenario where groundwater use reductions and a specific ramp down schedule could be developed.

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

Comment 3: Water quality should be addressed immediately, and if/when water quality are determined the parties responsibly must be held accountable for any remediation. When and if water quality becomes a concern that may require mitigation within any portion of the Subbasin, the GSA may consider implementing PMA No. 4 – Water Quality Optimization and/or PMA No. 5 – Intra-Subbasin Water Transfers Program. Funding sources for the 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.

Comment 4: Groundwater dependent ecosystems must be considered in overall water allocation calculus and timing of reductions. The GSA acknowledges the commenter's concern regarding groundwater dependent ecosystems. The GSP addresses groundwater dependent ecosystems as part of the analysis which can be found in Chapters 2 and 3, and Appendix D4. The GSP concludes that impacts to groundwater dependent ecosystems are a pre-2015 impact and is not currently an undesirable result applicable to the Subbasin.

Comment 5: What projects and management actions would need to be utilized to go about implementing the four objectives the ratepayers would like to see implemented, and how? Responses to Comments 1 and 2 indicate PMA No. 3 – Pumping Reduction Program would be utilized to implement specific reductions and the time schedule for those reductions and the potential scenarios and how they could be developed. For water quality, response comment 3 indicates PMA No. 4 – Water Quality Optimization and/or PMA No. 5 – Intra-Subbasin Water Transfers Program would be utilized if necessary. For groundwater dependent ecosystems, there is no project or management action since it is not considered an undesirable result applicable to the basin.

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

Comment 6: The 2010 through 2014 period was the worst possible interval for the Borrego Water District for development of the baseline pumping allocations. How was the timeframe of 2010 through 2014 selected as the time period for determining baseline pumping allocations?

In response, the GSA sought extensive public input prior to determining the time period for the baseline pumping allocation. Please see meeting minutes from September 28, 2017, November 17, 2017, and January 25, 2018. They can be found on the County of San Diego's (County's) Sustainable Groundwater Management Act (SGMA) website at:

<https://www.sandiegocounty.gov/content/sdc/pds/SGMA/borrego-valley.html>.

Comment Letter I90

County of San Diego
Planning and Development
5510 Overland Ave, suite 310
San Diego, CA 92123
C/O: Jim Bennett

May 16, 2019

Ref: Borrego Valley Groundwater Sustainability Plan

Mr. Jim Bennett

During the last four plus years many of us have spent hundreds of hours working the over draft problem I don't recall there being any discussion that the plan for setting the pumping reductions would be established through negotiations with the pumpers to establish a Stipulated Agreement. Some question that could have been asked if shared with the A/C are; I would like to present now.

- Who are representing the Core team?
- Are all of the sectors included in the negotiations?
- Will the results of the negotiations be shared with the A/C before they are incorporated in the GSP?
- If the Stipulated Agreement is established can the reductions start while the two year CEQA review takes place?
- Will a consideration to front load the reductions to bank water to protect the program from possible unknown problems that may come up during the 20 year span of the GSP? (IE; multiyear drought resulting in reduction of recharge)
- Is the reductions that the rate payers have already achieved being considered?

If there are sufficient representation in the negotiations, it would greatly reduce the possibility of litigation, which is a good thing for the program.

It would be helpful if the Core Team would summarize the comments on the GSP received and share them with the A/C prior to the next meeting.


Jim Wilson, Member at Large, Advisory Committee

I90-1

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Letter I90

Commenter: Jim Wilson

Date: May 16, 2109

I90-1 The Groundwater Sustainability Agency (GSA) acknowledges the questions regarding the stipulated agreement process that is occurring. In response, on July 9, 2019, the Borrego Water District (BWD) had a public meeting in which proposed stipulated agreement terms were made public. Additionally, per your request, the response to public comments were discussed at the Groundwater Sustainability Plan (GSP) advisory committee meeting held on July 25, 2019.

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

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