

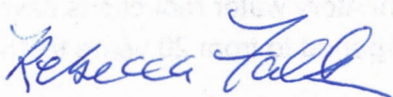
Borrego Springs Community Sponsor Group
Comments on the Draft Groundwater Sustainability Plan (GSP)
Borrego Valley Groundwater Basin

1. The Borrego Springs Community Sponsor Group (BSCSG) would prefer no reductions in water use for the municipal sector. Proportional reductions are a major concession to non-municipal sectors. BWD's Baseline Pumping Allocation (BPA) should remain at 2461 af/yr as proposed to the Advisory Committee or at the full 2700 or so af/yr that was the highest single year water use for the municipal sector in 2010, and not be reduced further in addition to the concession of proportional reductions. Proportional reductions are only acceptable as long as the amount of water used under Human Right to Water provisions of state law is not subject to reductions for municipal users under the GSP. If other sectors do not agree to sign the GSP, BWD should fully assert its interest and seek current water use and water for the future with no reductions.
2. Water reductions should be front-loaded (using a fixed percentage of the Baseline Pumping Allocations to calculate yearly reductions rather than a fixed volume of water as is currently indicated in the GSP) so that higher reductions in water use occur early. This will save significantly more of the water in our aquifer than the current reduction method will, and safeguards against water quality and water management issues that will be too late to adequately address if they occur later in the reduction period after the aquifer has been dewatered more significantly. Changing methods for calculating mandatory water reductions saves as much aquifer water as shortening the reduction period to from 20 years to 15 years using the current method.
3. The Sponsor Group supports the mandatory metering program as detailed in Appendix E of the draft GSP and its immediate implementation upon GSP approval, and would like the GSP to describe that program, not as an "approach" in the section on the mandatory metering program, GSP p. 3-36, second full paragraph, but rather as a requirement that is detailed in Appendix E, so that the mandatory requirements are emphasized in all parts of the GSP. Similarly, p. ES-5, PMA #3, last sentence, should affirmatively read that Mandatory water metering... "will" take place rather than "is proposed to take place following adoption of this GSP."
4. Water quality is an essential concern. Better data must fill the data gaps for water quality in the North Management Area. New monitoring wells for water quality that are not quite yet in place, and additional wells now in the process of being

secured for water quality monitoring, won't yield usable initial data once installed for about three years (and then it will show the beginning of a likely trend). The Sponsor Group would like the GSP to explicitly specify that the governing body that implements the GSP has the authority to impose mandatory water quality monitoring of any major wells in the subbasin, including any agricultural wells, so that any needed comprehensive data is made available. The GSP should also address who will pay for addressing water quality issues that arise in agricultural areas, including under a water trading program.

5. The GSP should list Ratepayers and the Sponsor Group as stakeholders in the discussions and crafting of a Water Trading Program because what happens to pumped water in Borrego Springs is a matter of public concern about a public resource, and also because of land use impacts of such a program.
6. There should be consideration in the GSP for our SDAC (Severely Disadvantaged Community) status: cost impacts that can affect water rates must be considered.

Borrego Springs Community Sponsor Group
Approved for Submission at the May 2, 2019 BSCSG Meeting



Rebecca Falk, Chair, BSCSG