

Comment on the Draft Groundwater Sustainability Plan (GSP)
Borrego Valley Groundwater Basin
May 20, 2019

I am concerned that the language in the body of the GSP for Mandatory Water Metering is weak (conditional, suggests rather than stipulates), even though the language in Appendix E, the Program itself, is strong (assertive of rules and mandates). Since this is the one action the farmers have agreed to as of this writing, and it is critically important, the language in the body of the GSP should be revised to mirror the strength of the language in Appendix E, to avoid giving the impression that all the Program's mandatory provisions aren't in fact mandatory. See draft GSP, pp. 3-39, 2nd paragraph, and E-S5, PMA #4, last sentence.

See for example (italics and bold mine):

(Executive Summary, ES-5, PMA #4, last sentence) "Mandatory water metering for all non-de-minimus groundwater extractors ***is proposed*** to take place following adoption of this GSP." *Why not, **will take place**?*

(Monitoring Network, 3-39, 2nd full paragraph) First there is a strong sentence: "Upon Plan adoption all non-de-minimus groundwater extractors **will be required** to record monthly groundwater production and report to the GSA on an annual basis." But this sentence is followed by weak statements: "***It is expected*** that the property owner (or third party contractor acceptable to the GSA) **would** monitor/read the meter on a monthly basis." And: "A third-party contractor acceptable to the GSA **would** inspect and read the meter on a semi-annual basis to verify the accuracy of data including meter calibration. On behalf of the property owner, the third-party contractor **would** provide an annual statement...." The paragraph ends with another weak statement: "***The approach*** for well metering is detailed further in the Groundwater Extraction Metering Plan provided as Appendix E."

*Again, why not **will** instead of **would** in the above sentences? Why not '**The property owner ...will monitor/read**', and why not '**The Groundwater Extraction Metering Plan (Appendix E) provides further details**?*

Why not put Appendix E into the body of the GSP under Monitoring Network?

Sincerely,

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