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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

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.

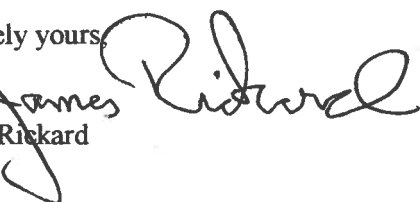
During this same period of water reductions by BWD, water storage in the basin was reduced by approximately 160,000 AF. These figures are a clear indicator that the parties responsible for the overdraft were pumpers other than BWD: 70% due to farming, 20% due to recreation/golf courses.

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.

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

Sincerely yours,

James Rickard



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