

County of San Diego

May 15, 2019

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;

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 of 2018. 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, and specifically the period being limited to only these five years, is certainly the worst possible scenario for BWD. BWD began reducing its usage in 2003, when it pumped 3926 AF (and its pumpage had been close to that amount for years.) 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 Haldeman