

4-13-16
SWRCB Clerk

April 13, 2016

Jeanine Townsend, Clerk of the Board State Water Resources Control Board 1001 | Street, 24th Floor Sacramento, CA 95814

Dear Ms. Townsend:

The Borrego Water District is an isolated, small water purveyor located in the Anza-Borrego Desert. The community is entirely dependent on the Borrego Valley Groundwater Basin (BVGB) for its sole source of water. The BVGB is listed as a medium priority, critically overdrafted basin and steps are in place to create a Groundwater Sustainability Plan (GSP) by January 31, 2020.

Our community has worked diligently to conserve water and over the past five years, the District has reduced its overall municipal production by 20%. Unfortunately, the baseline period of 2013-2014 was a much wetter than normal period. For example, in 2013 between July and September (the normal wet months in Borrego), Borrego received 4.18 inches of rain, more than twice its historical average. In 2015, Borrego received 0.2 inches of rain between the same dates. Thus, for our desert environment, using the SWRCB's baseline for reductions, any short-term reductions have been difficult to achieve.

A great deal of work has been completed in preparation for the creation of the GSP. One major accomplishment was the creation of the Borrego Water Coalition, a stakeholder group representing approximately 80% of the annual water use in the BVGB. Of the water use sectors, agriculture is extracting 70%, recreation 20% and domestic 10% of the total annual withdrawals from the BVGB. As we move to create the GSP, reductions need to take place across the board to all sectors, not just the municipal users that are mandated by the Executive Order (EO). Another major accomplishment was a recently published report by the U.S. Geological Survey which suggests that the uppermost, and most prolific of three aquifers in the BVGB, has an estimated life of 50 years. This provides an ample amount of short-term storage to address the EO.

The EO has had marginal overall effectiveness for our unique situation, and in many ways, has only created conflict since it only addressed municipal production, comprising a modest 10% of the BVGB total annual water usage. Please allow us to continue our GSP path, which will provide for *permanent* reductions to achieve sustainability by exempting our desert community from provisions of the EO.

Sincerely.

Jerry Rolwing General Manager

Cc: Beth Hart, President of the Board of Directors