



BORREGO WATER DISTRICT

April 13, 2015

Ms. Jessica Bean
State Water Resource Control Board
via email: jessica.bean@waterboards.ca.gov

Dear Ms. Bean:

The Borrego Water District is a small public water agency in an unincorporated region of San Diego County. The community is totally reliant on groundwater with no option for imported water. The District is actively working on a Groundwater Sustainability Plan (GSP) as mandated by the Sustainable Groundwater Management Act (SGMA) signed last September by Governor Brown. The new 25% reduction as required by the Governor's April 1st Executive Order is a good first step for our groundwater reduction and should dovetail nicely into our Plan. We would like to assist the SWRCB in this effort but it would be extremely helpful if you could provide some tools for our agency to initiate this program.

The community of Borrego Springs is completely surrounded by the Anza-Borrego Desert State Park. A good portion of our residents are environmentally conscious and many are very frugal with their water usage to a point there is no more conservation achievable. A 25% reduction across the board will be an extreme hardship for this class of customers. It would be very helpful for the regulations to clarify that small water agencies with frugal water users can contribute by reducing their usage by less than 25%, just as the framework proposes for larger water utilities.

In addition, we are concerned about the pending court decision that may prevent an agency like ours from adopting tiered water rates without an onerous process under Proposition 218. Because time is so short before the summer, it would be very helpful for the SWRCB to provide guidance to local agencies on what ordinances/regulations we can adopt to impose tiered pricing to encourage conservation. It might also be helpful for the SWRCB to delegate authority it received under the Executive Order, provided that it is used in specified ways.

Even if we were to adopt tiered water rates, those rates would have little effect on the groundwater pumpers in the Valley who do not utilize the Borrego Water District for water service. This is the primary reason we are proceeding with the SGMA to build a reduction program that includes all pumpers. Presently, agriculture pumps approximately 70% of the groundwater in our basin, recreation (mainly golf courses) pump 20% and the District pumps 10% for domestic use. Might it be possible for the SWRCB to clarify that any water conservation measures will apply to all water uses (including commercial, industrial and

institutional) within the boundaries of a local agency? Again, delegating authority that the SWRCB received under the Executive Order and/or providing guidance about how we could implement such a reduction would be very helpful.

In summation, we applaud the efforts of the SWRCB and the speed with which you were able to generate the framework document.

Sincerely,



Jerry Rolwing
General Manager

Cc: Bill DiBiase, SWRCB, Field Operations Branch, San Diego Region