Borrego Springs Watermaster
Technical Advisory Committee Meeting
August 7, 2025 @ 10:00 a.m.
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AGENDA

Items with supporting documents in the TAC Meeting Package are denoted with a page number.

I. Roll Call

II. Public Comments
This is an opportunity for members of the public to address the TAC on items included on the agenda. Comments will be limited to three minutes per commenter

III. BVHM Simulation Results: Northward Shift of Future Pumping (PowerPoint Slide Deck) .....Page 2

IV. Updating Sustainable Management Criteria – Groundwater Levels and Storage .....Page 32

V. Review of the UCI GDE Study Report as "Best Available Science" .....Page 51

A. Candidates for Independent Peer Reviewer
B. Scope of work, deliverable, and schedule for independent peer review
C. TAC assignment to review and comment on the GDE Study Report

VI. Public Comments (time permitting)
This is an opportunity for members of the public to address the TAC on items discussed during the meeting. Comments will be limited to three minutes per commenter, time permitting.

VII. Future Meetings

VIII. Adjournment

TAC Agenda

1. Public Comment
2. **BVHM Simulation Results: Prospective Northward Shift of Future Pumping**
3. Updating Sustainable Management Criteria – Groundwater Levels and Storage
4. Review of the GDE Study Report as "Best Available Science"
5. Public Comment

Use of the BVHM to Evaluate Sustainability of Future Pumping

- As part of the SGM grant scope, an Initial Scenario was run using the BVHM to evaluate long-term sustainability of future pumping in the Basin
- BVHM was extended through WY 2070:
  - Pumping projections were assigned to all wells based on conversations with all major Pumpers
  - Future land uses were updated based on conversations with all major Pumpers
  - Future climate/hydrologic conditions were based on a repeated historical hydrology
- "Sustainability" was defined as:
  - Trends in groundwater levels are stable or increasing by 2040 and thereafter
  - Groundwater levels are always at sufficient elevations to not cause Undesirable Results
- TM published in March 2025 as SGM Grant deliverable (**March Results**)

Results, Interpretations and Recommendations from the Initial Scenario (March 2025 Results)

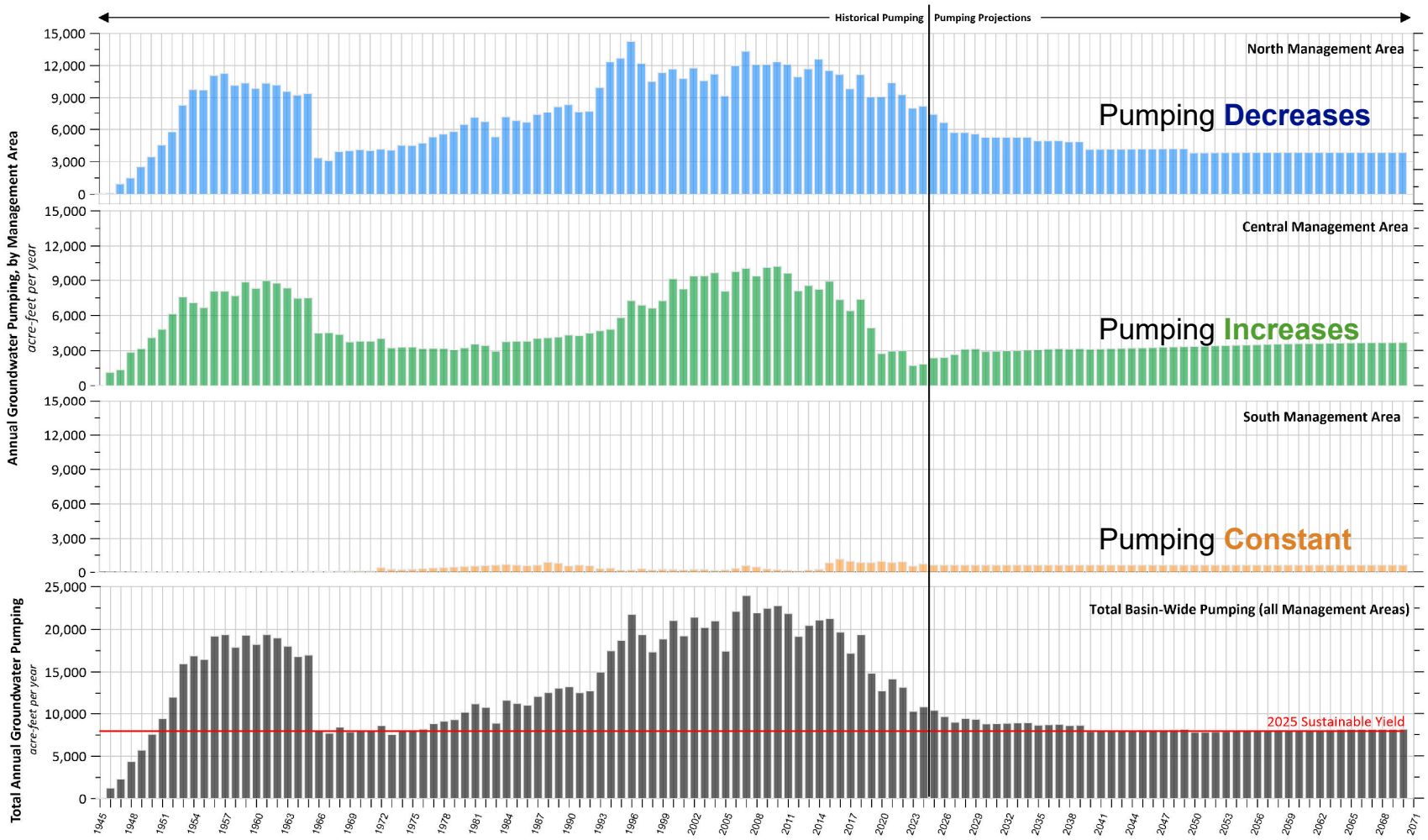
- **Results**:
  - Future groundwater levels increased and then stabilized by WY 2040 in the NMA
  - Future groundwater levels declined continuously through WY 2070 in the CMA and SMA
- **Result**: A discrepancy was identified in the BVHM where wells in the SMA were "under-pumping" during the simulation (*i.e.,* simulated pumping was less than assigned pumping)
- **Interpretation**: The hydrogeologic conceptual model may be incorrect in the southern portion of the Basin; hence, the BVHM may not be sufficiently calibrated in this area
- **Recommendation**: Update the hydrogeologic conceptual model in the BVHM and recalibrate as part of the 2030 Redetermination of the Sustainable Yield
- **Recommendation**: Explore a northward shift of BWD pumping. ***Objective***: better balance pumping and groundwater levels across the Basin.

Work Completed since the Initial Scenario

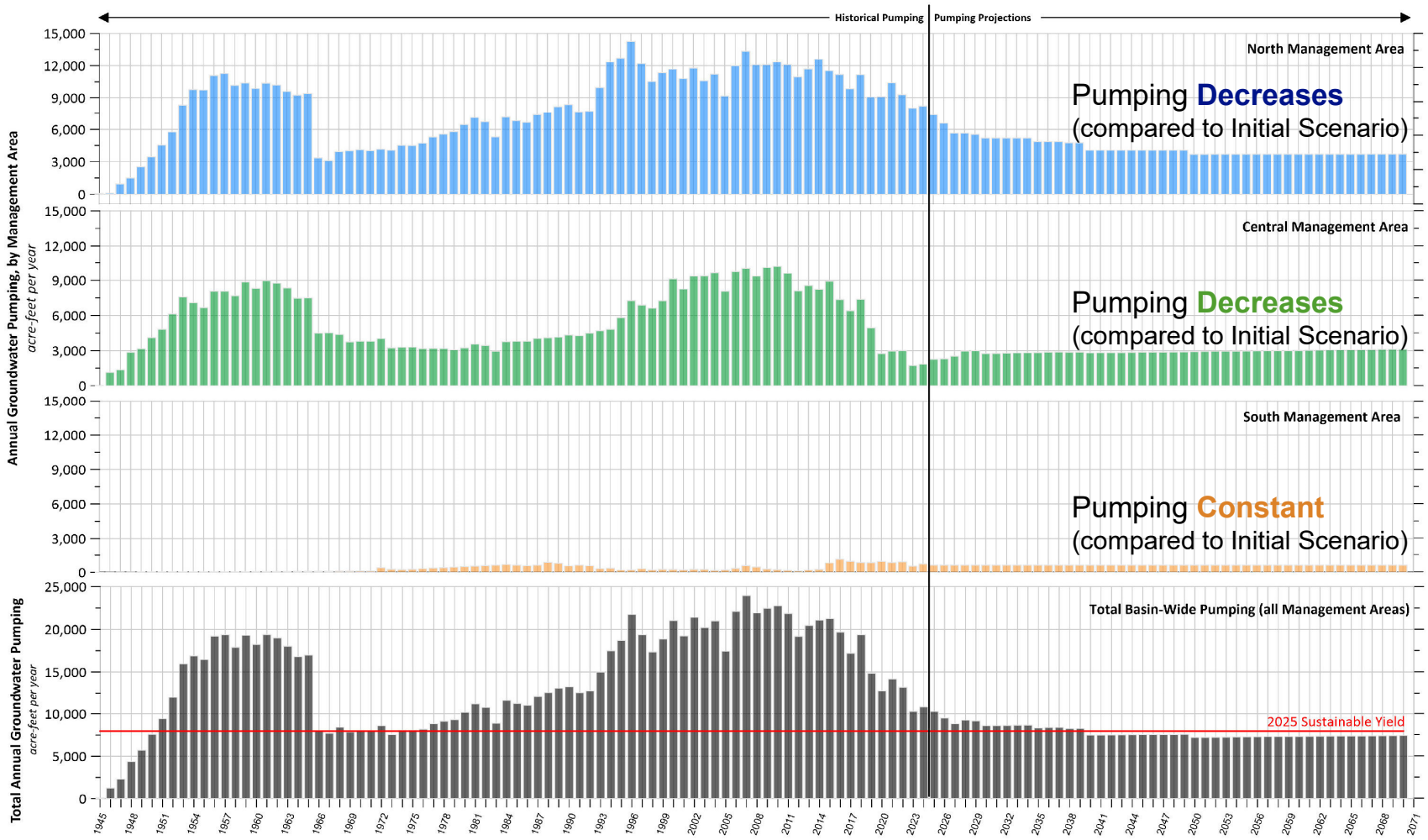
- Coordinated with T2 and BWD to develop two new pumping projection scenarios
- **Scenario 1A** → New "Baseline" Scenario
  - Decrease BWD demands to more realistic of future pumping
    - Pumping is 130 to 740 afy less compared to Initial Scenario over the period 2025 to 2070
- **Scenario 1B** → Explores northward shift of BWD pumping
  - Same as Scenario 1A, except 800 afy of BWD pumping is shifted from CMA to two wells in the NMA

Water Year	Planned Pumping *(Initial Scenario)* (a)	Planned Pumping *(Scenarios 1A-1B)* (b)	Difference in Planned Pumping (Scenario 1A/B - Planned) *(c) = (b) - (a)*
2025	**10,400**	**10,270**	**-130**
2026	9,661	9,513	-148
2027	8,984	8,818	-166
2028	9,431	9,247	-184
2029	9,366	9,164	-202
2030	**8,805**	**8,585**	**-220**
2031	8,842	8,604	-238
2032	8,878	8,622	-256
2033	8,915	8,641	-274
2034	8,943	8,651	-292
2035	**8,642**	**8,332**	**-310**
2036	8,709	8,381	-328
2037	8,738	8,392	-346
2038	8,604	8,240	-364
2039	8,633	8,251	-382
2040	**7,896**	**7,496**	**-400**
2041	7,925	7,507	-418
2042	7,954	7,518	-436
2043	7,983	7,529	-454
2044	8,012	7,540	-472
2045	**8,040**	**7,550**	**-490**
2050	**7,812**	**7,232**	**-580**
2051	7,841	7,243	-598
2052	7,870	7,254	-616
2053	7,899	7,265	-634
2054	7,928	7,276	-652
2055	**7,957**	**7,287**	**-670**
2056	7,986	7,298	-688
2057	8,015	7,309	-706
2058	8,044	7,320	-724
2059	8,072	7,330	-742
2060	**8,101**	**7,341**	**-760**
2061	8,110	7,352	-758
2062	8,119	7,363	-756
2063	8,128	7,374	-754
2064	8,137	7,385	-752
2065	**8,146**	**7,396**	**-750**
2066	8,155	7,407	-748
2067	8,164	7,418	-746
2068	8,173	7,429	-744
2069	8,182	7,440	-742
2070	**8,191**	**7,451**	**-740**

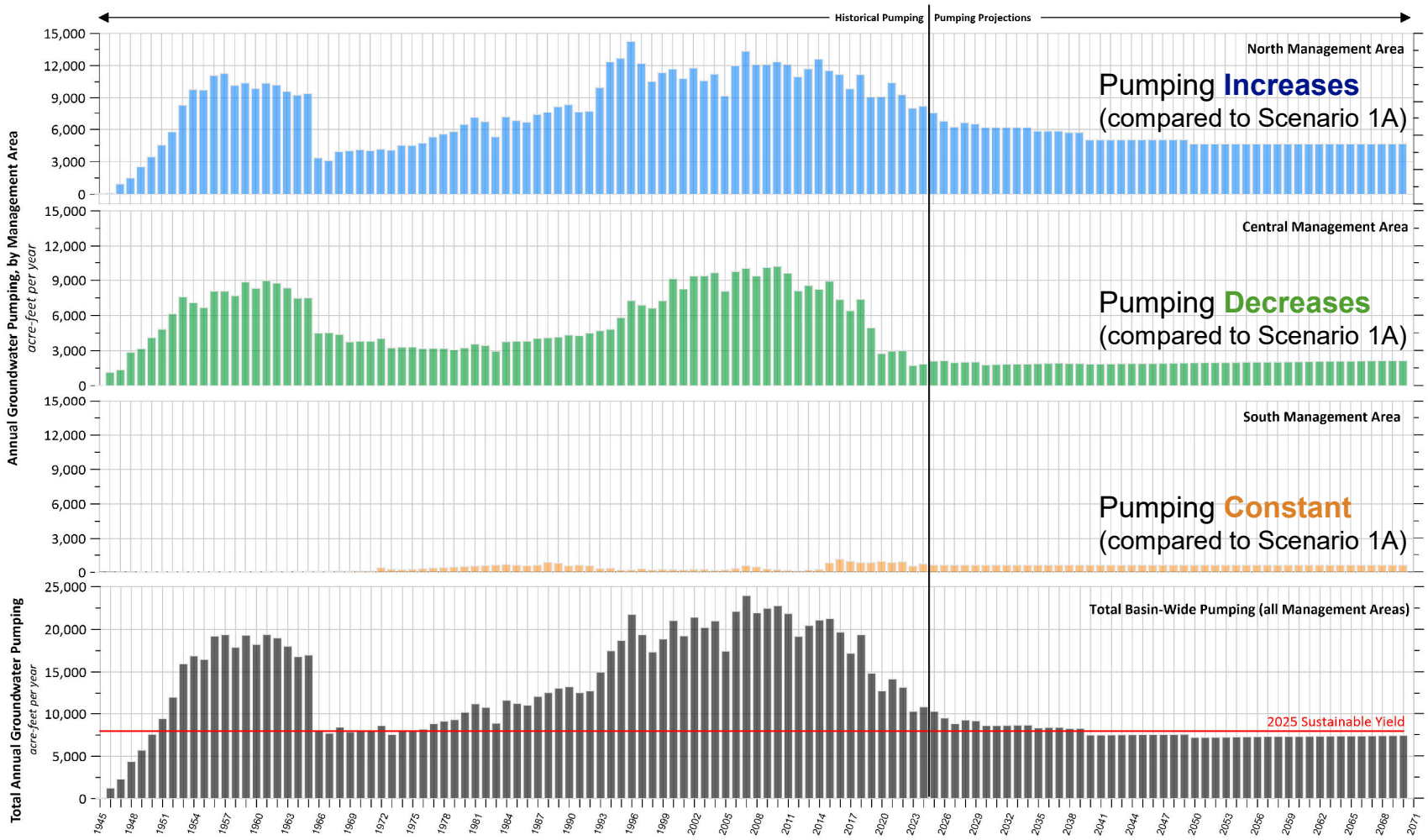
Pumping Projections – Initial Scenario



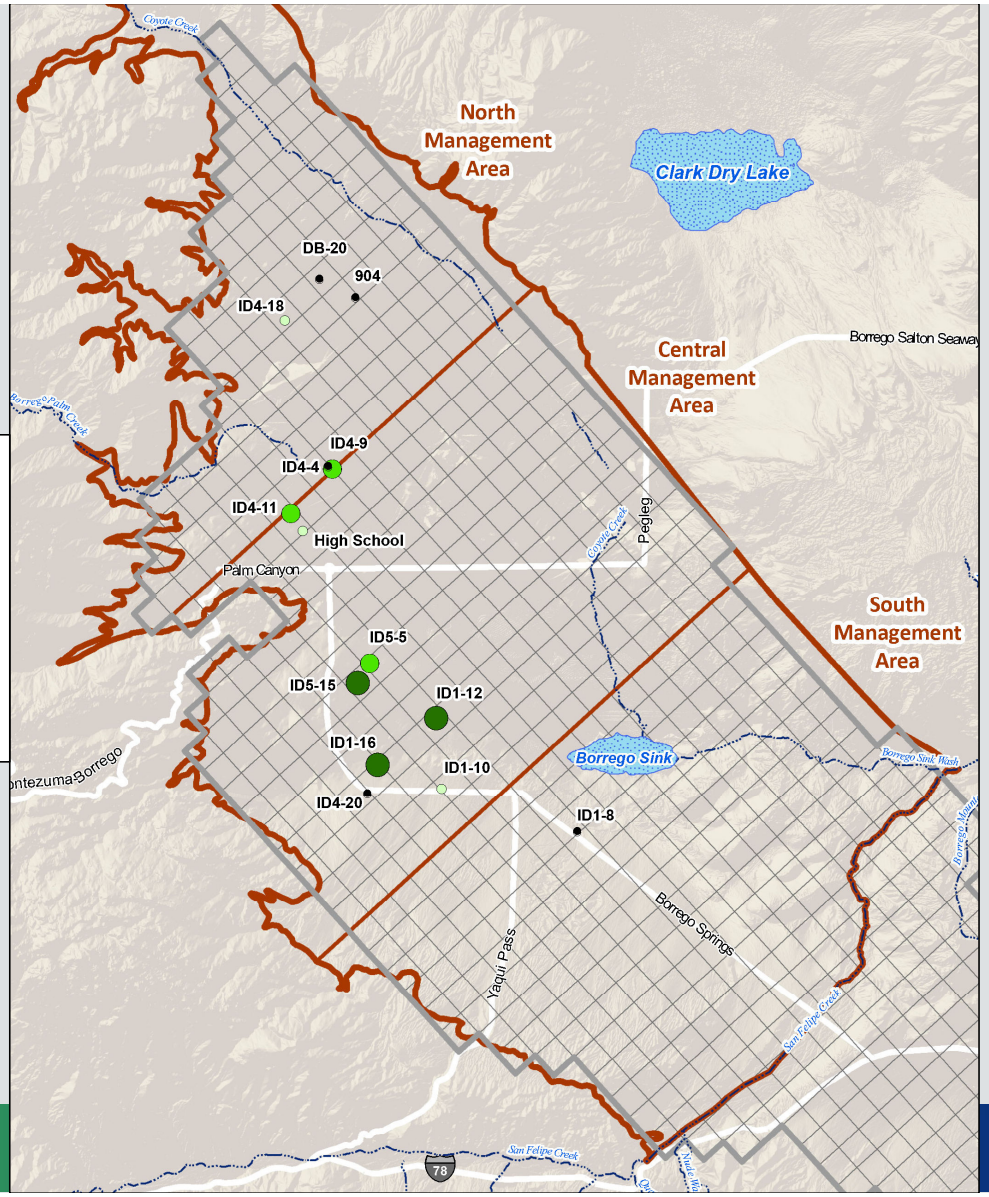
Pumping Projections – Scenario 1A



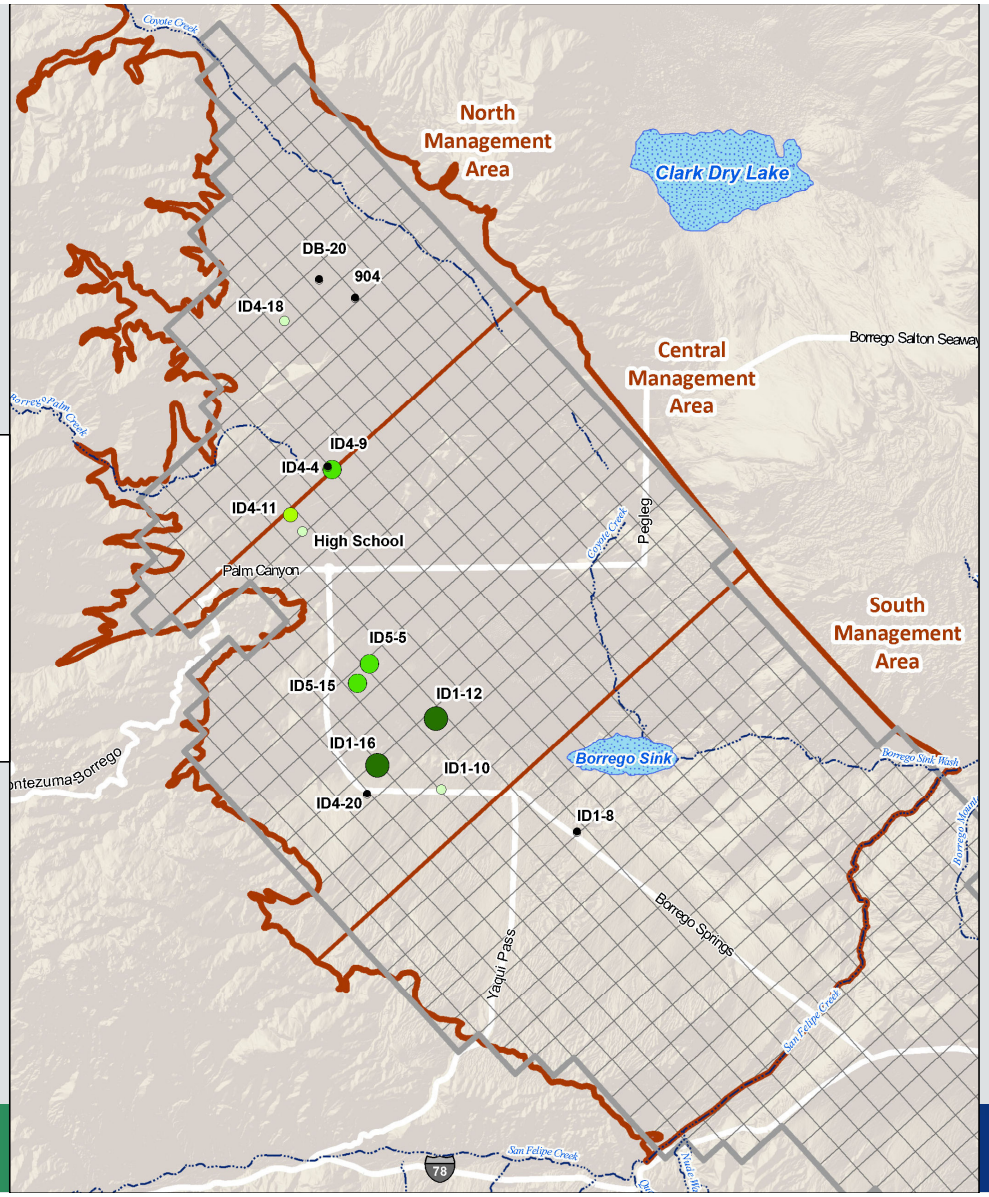
Pumping Projections – Scenario 1B



Initial Scenario
Pumping Projection
BWD Wells Only

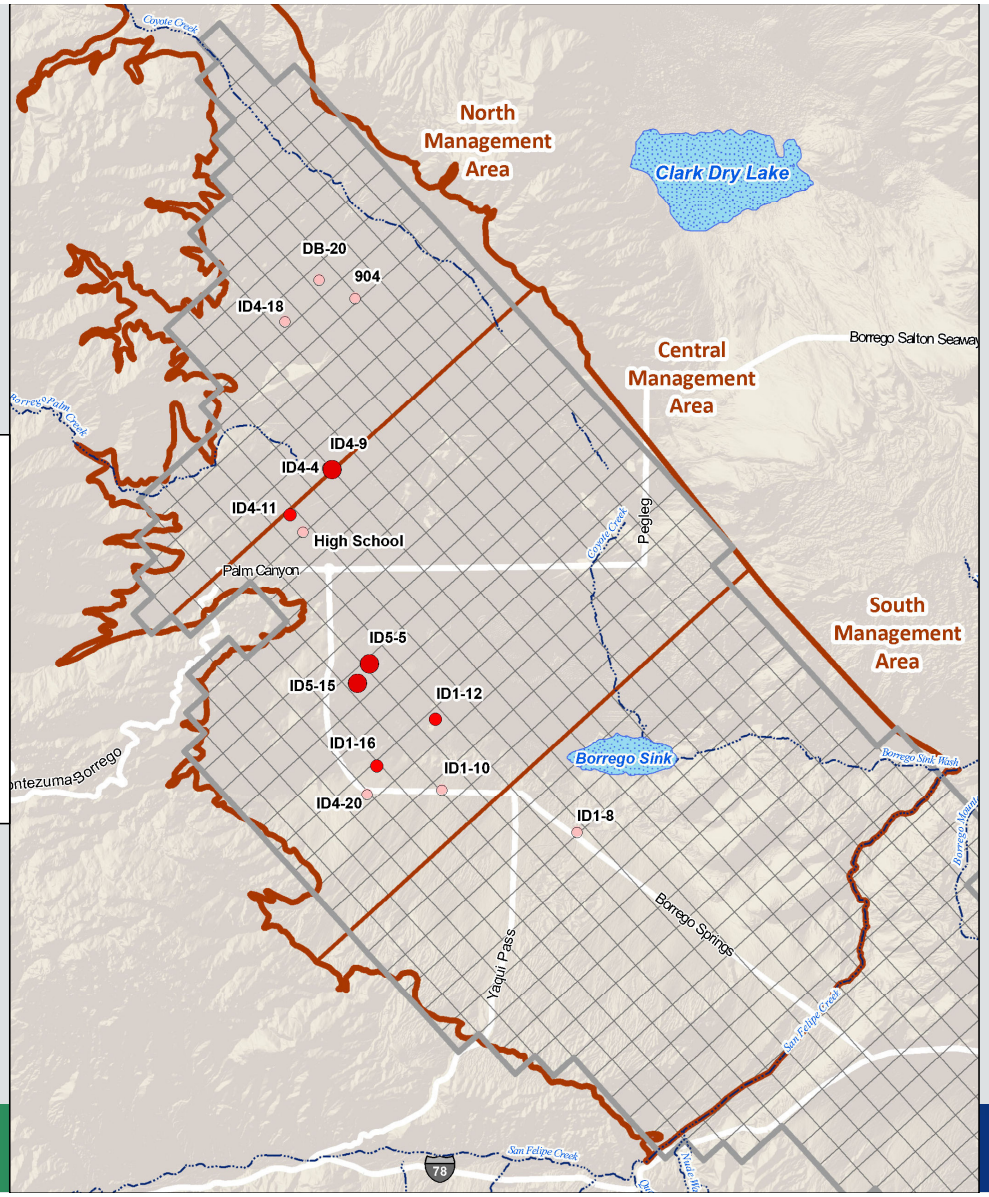


Scenario 1A
Pumping Projection
BWD Wells Only



1A minus Initial

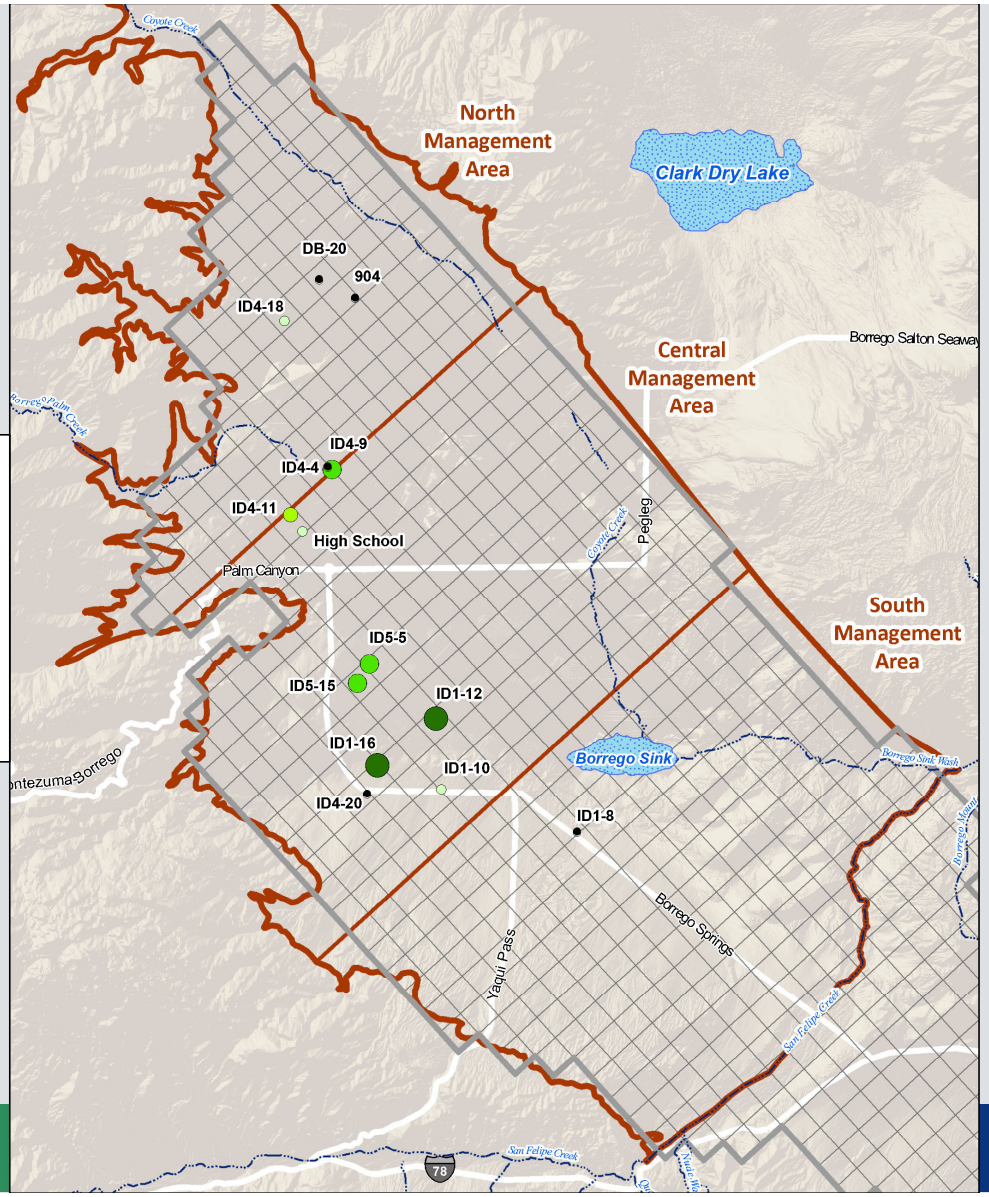
BWD Wells Only



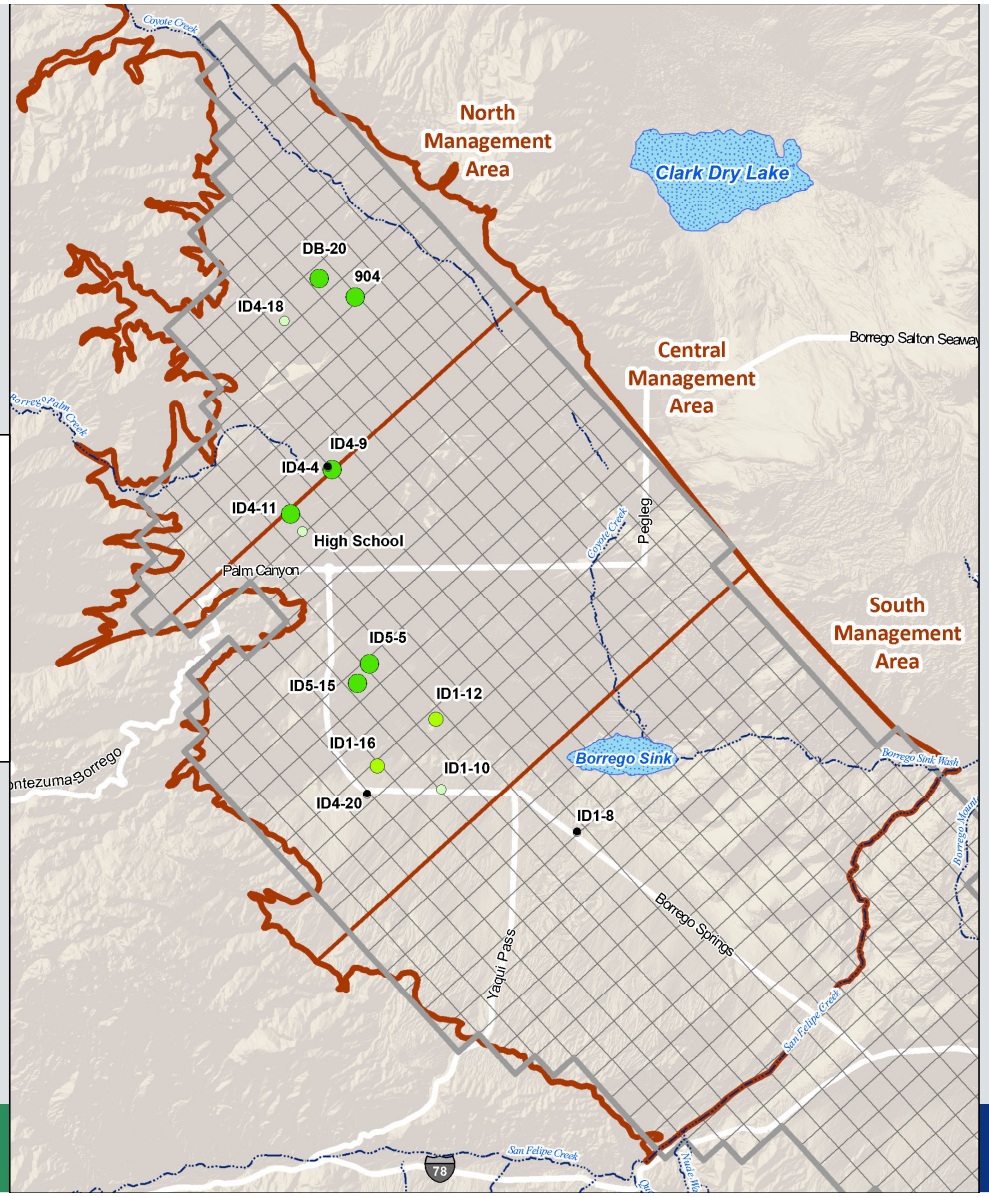
Difference in Annual Average Pumping (afy)
Scenario 1A Minus Initial Scenario

250 - 400	**Increased** Pumping in Scenario 1A
100 - 250	
25 - 100	
< 25	
0 (no change)	
< -25	**Decreased** Pumping in Scenario 1A
- 100 - -25	
-250 - -25	
-530 - -250	

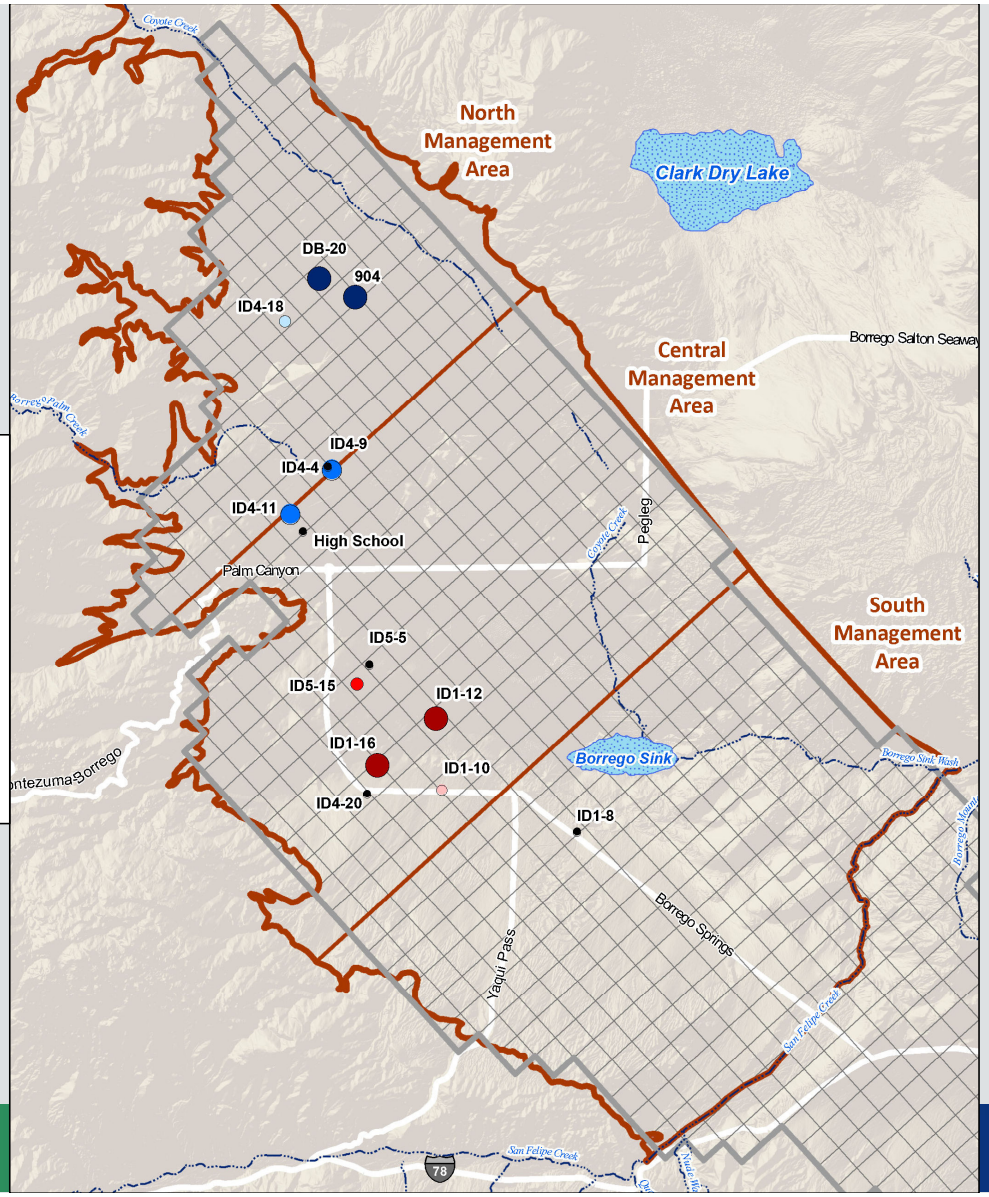
Scenario 1A
Pumping Projection
BWD Wells Only



Scenario 1B
Pumping Projection
BWD Wells Only



1B minus 1A
BWD Wells Only



Difference in Annual Average Pumping (afy)
Scenario 1B Minus Scenario 1A

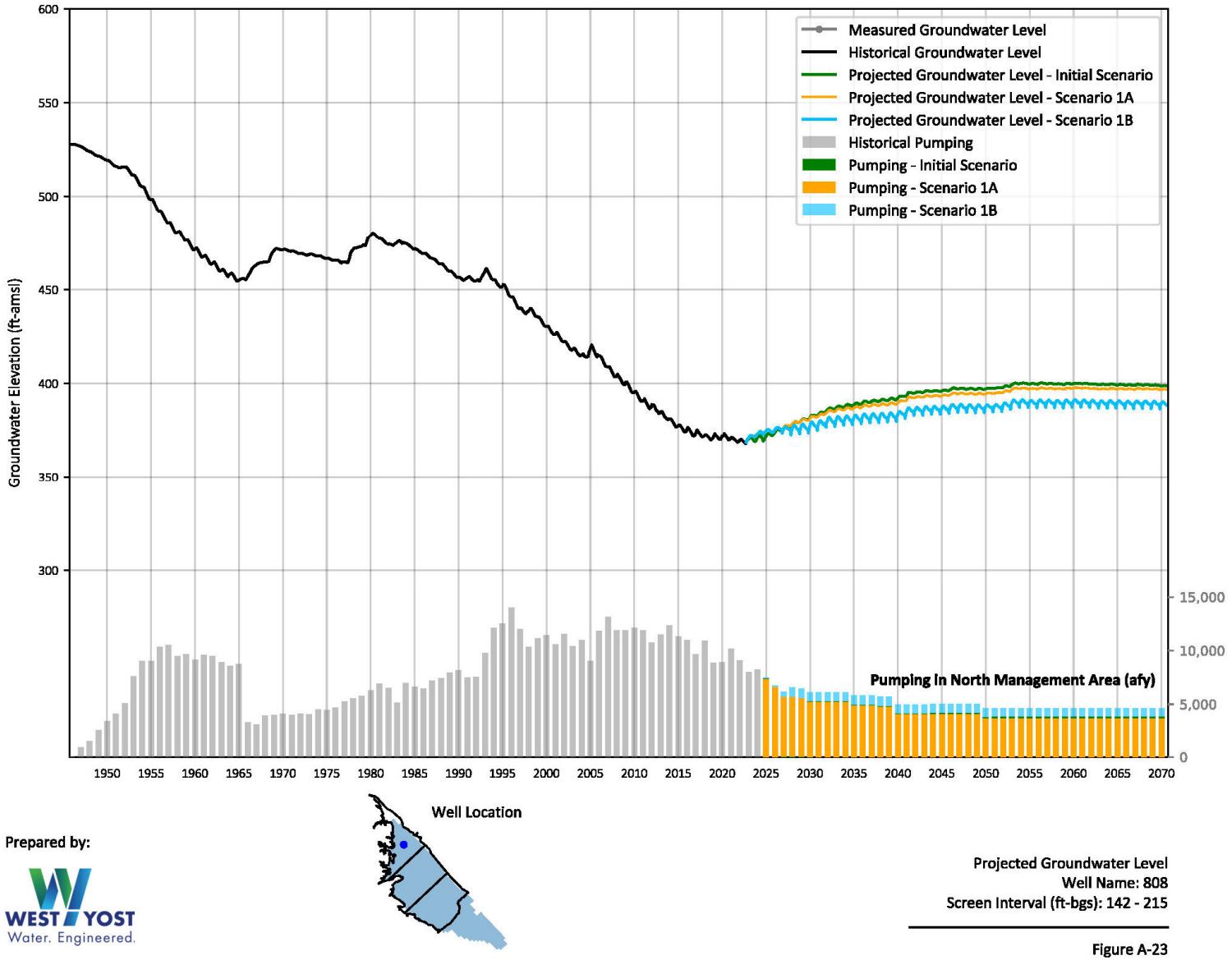
250 - 400	**Increased** Pumping in Scenario 1B
100 - 250	
25 - 100	
< 25	
0 (no change)	
< -25	**Decreased** Pumping in Scenario 1B
- 100 - -25	
-250 - -25	
-530 - -250	

Modeling Work Completed:

- Updated future assigned pumping in the MNW2 package (no other changes to other input files)
- Ran both scenarios using the BVHM through WY 2070, simulating:
  - Pumping Rampdown to 2025 Sustainable Yield by 2040
  - *Repeated Hydrology*: 47-year climate period of WY 1975-2022 was repeated for WY 2023-2070
- Reviewed model results:
  - Compared general trends in groundwater-levels by Management Area across all scenarios
    - Reviewed hydrographs
    - Reviewed maps of change in groundwater elevation (2020-2040) for each scenario
      - Changes over time
      - Comparisons between Scenarios

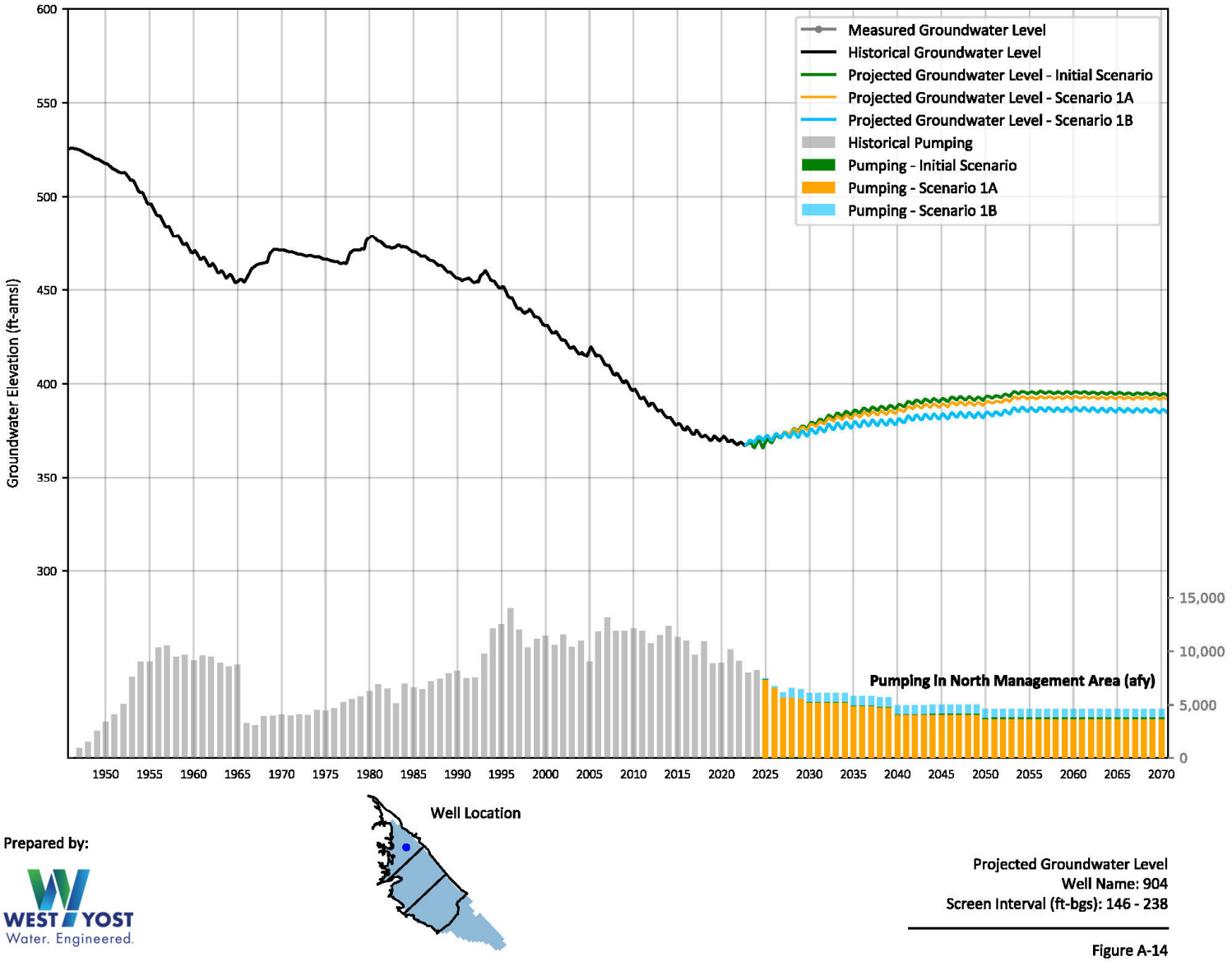
NMA:

- In all scenarios, groundwater levels begin to recover during GMP implementation and then stabilize after 2040



NMA:

- Potentially, more future pumping could occur in the NMA



Prepared by:

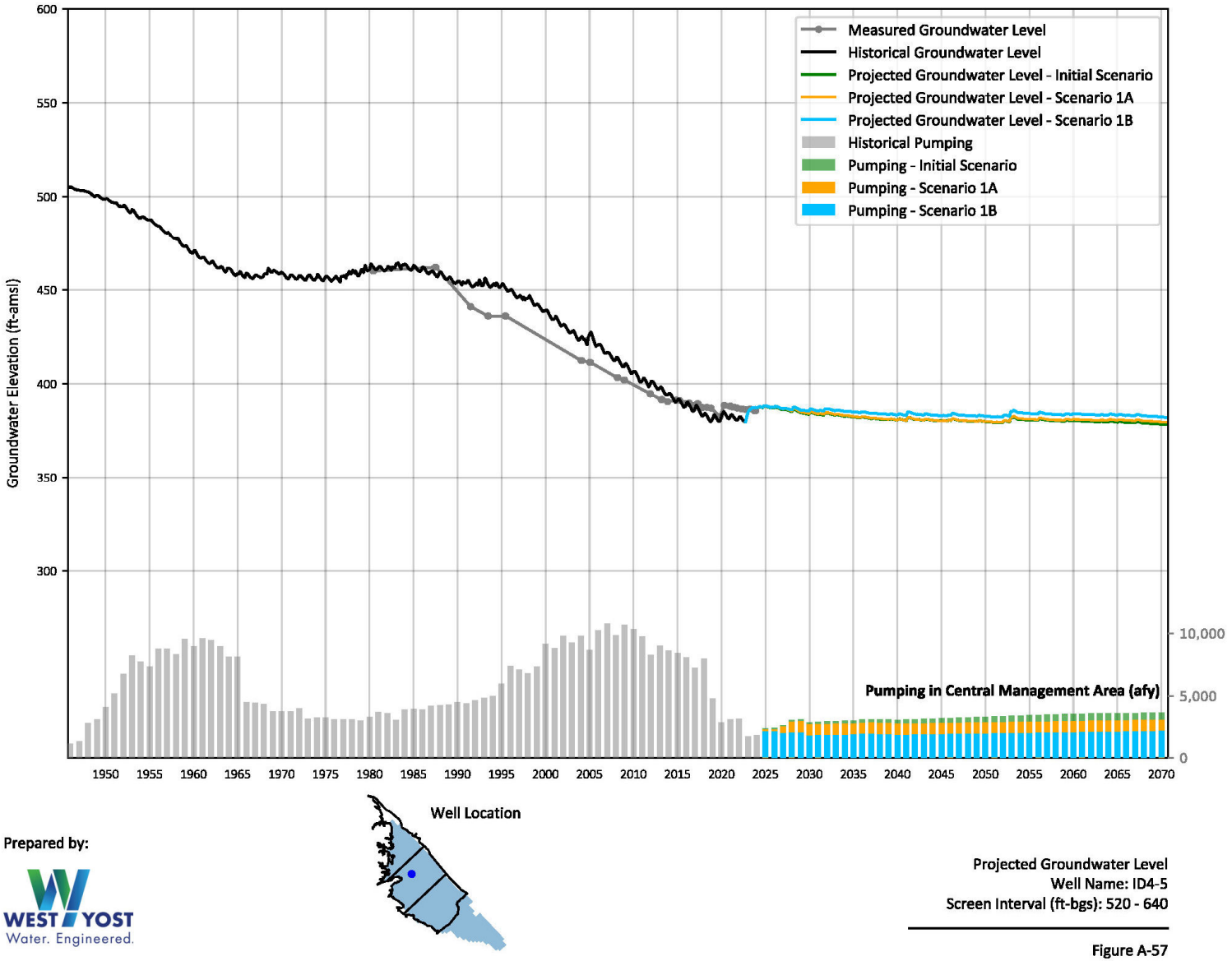
WEST YOST
Water. Engineered.

Projected Groundwater Level
Well Name: 904
Screen Interval (ft-bgs): 146 - 238

Figure A-14

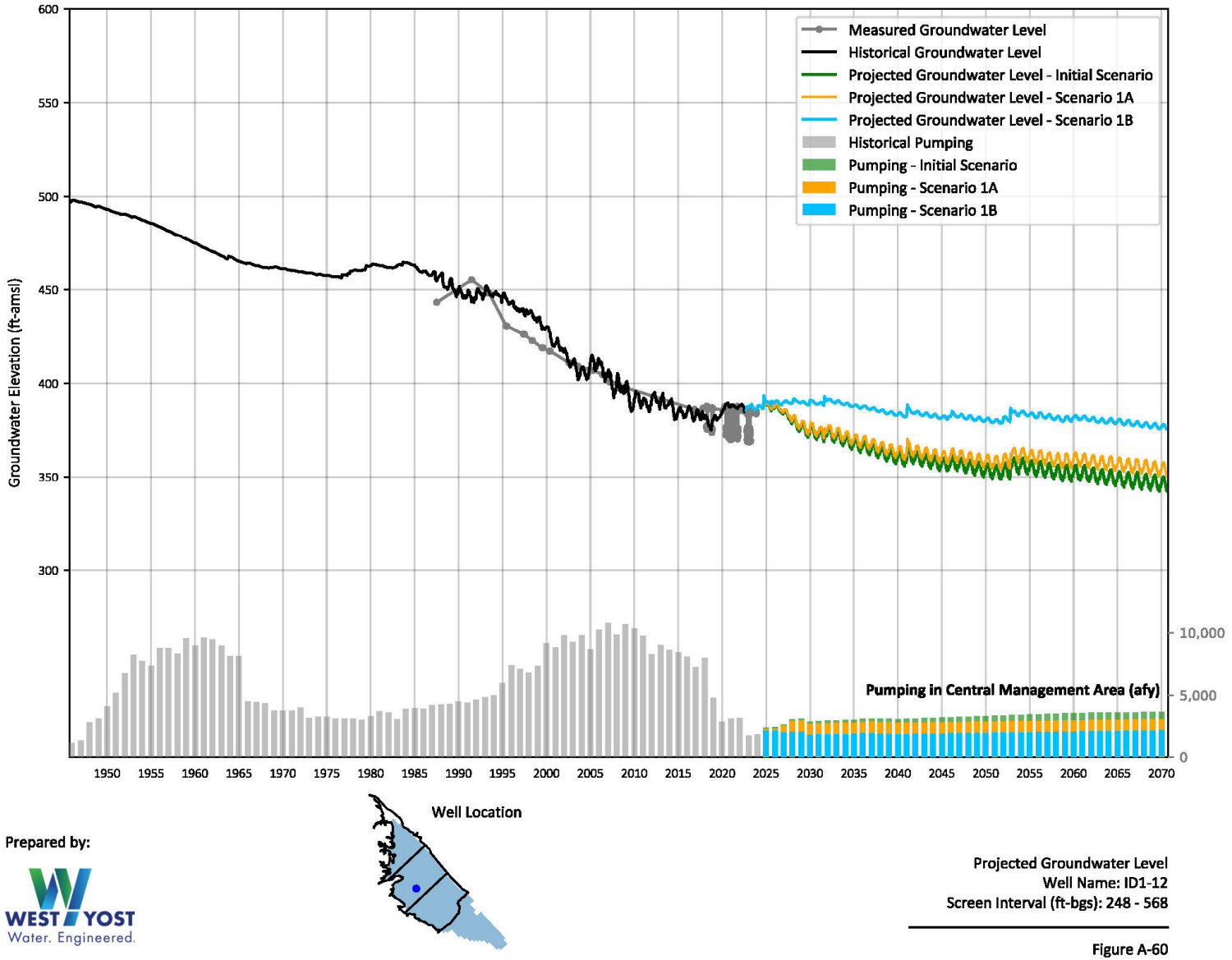
Northern part of CMA:

- Future groundwater levels are relatively stable



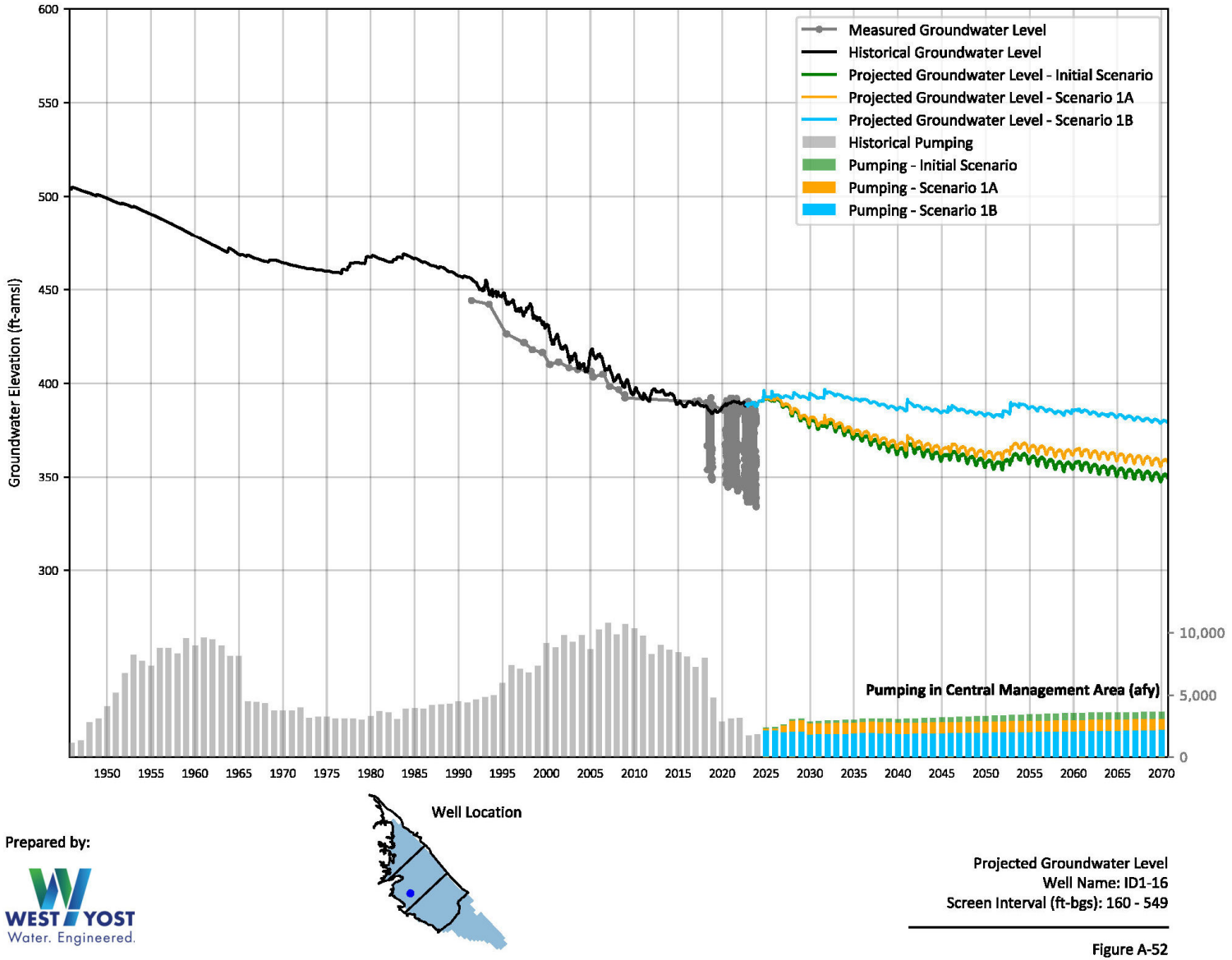
Southern part of CMA:

- Future groundwater levels continuously decline through 2070 in all scenarios, but decline the least in Scenario 1B



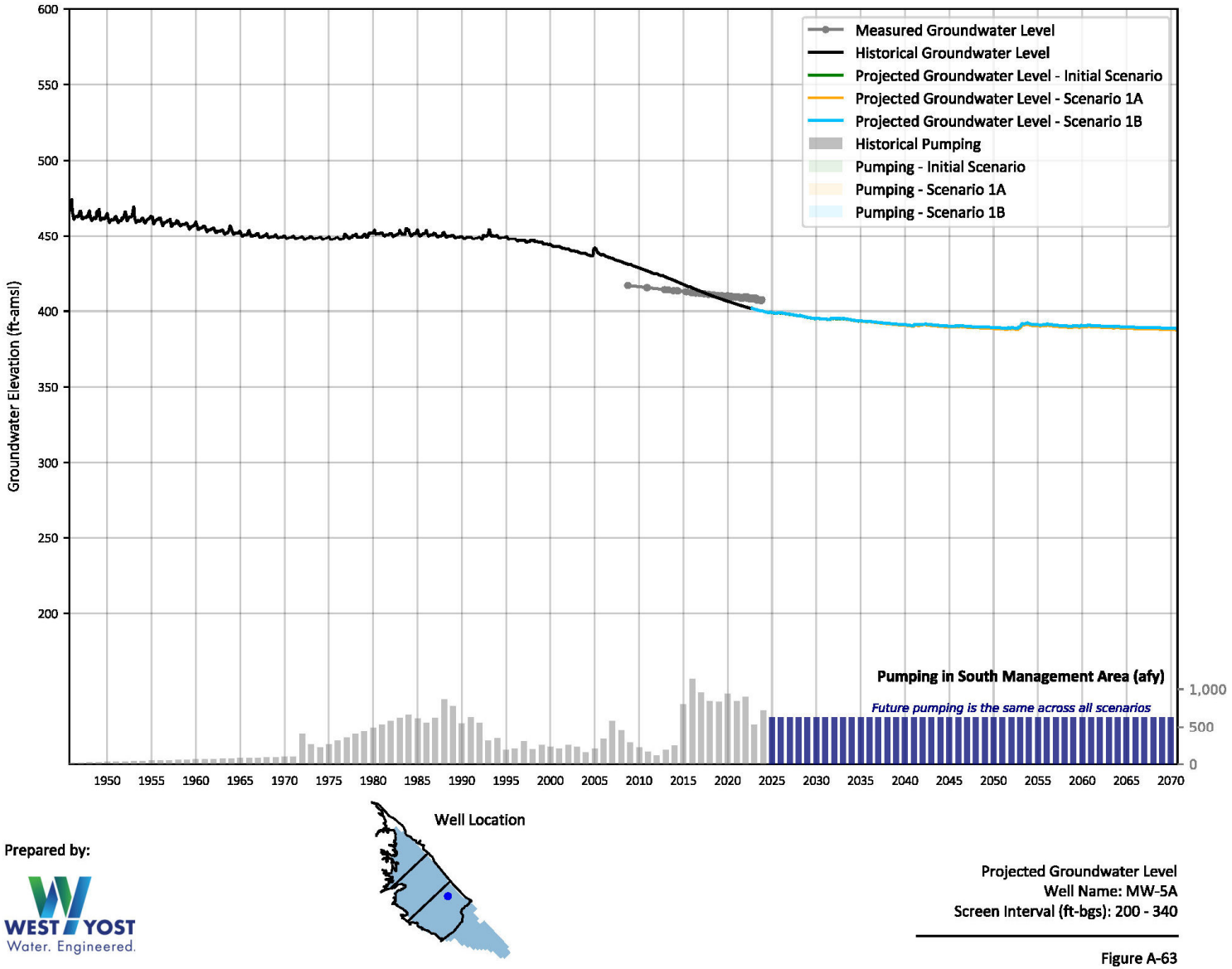
Southern part of CMA:

- Shifting pumping from CMA to NMA (Scenario 1B) may assist in stabilizing groundwater levels in the CMA



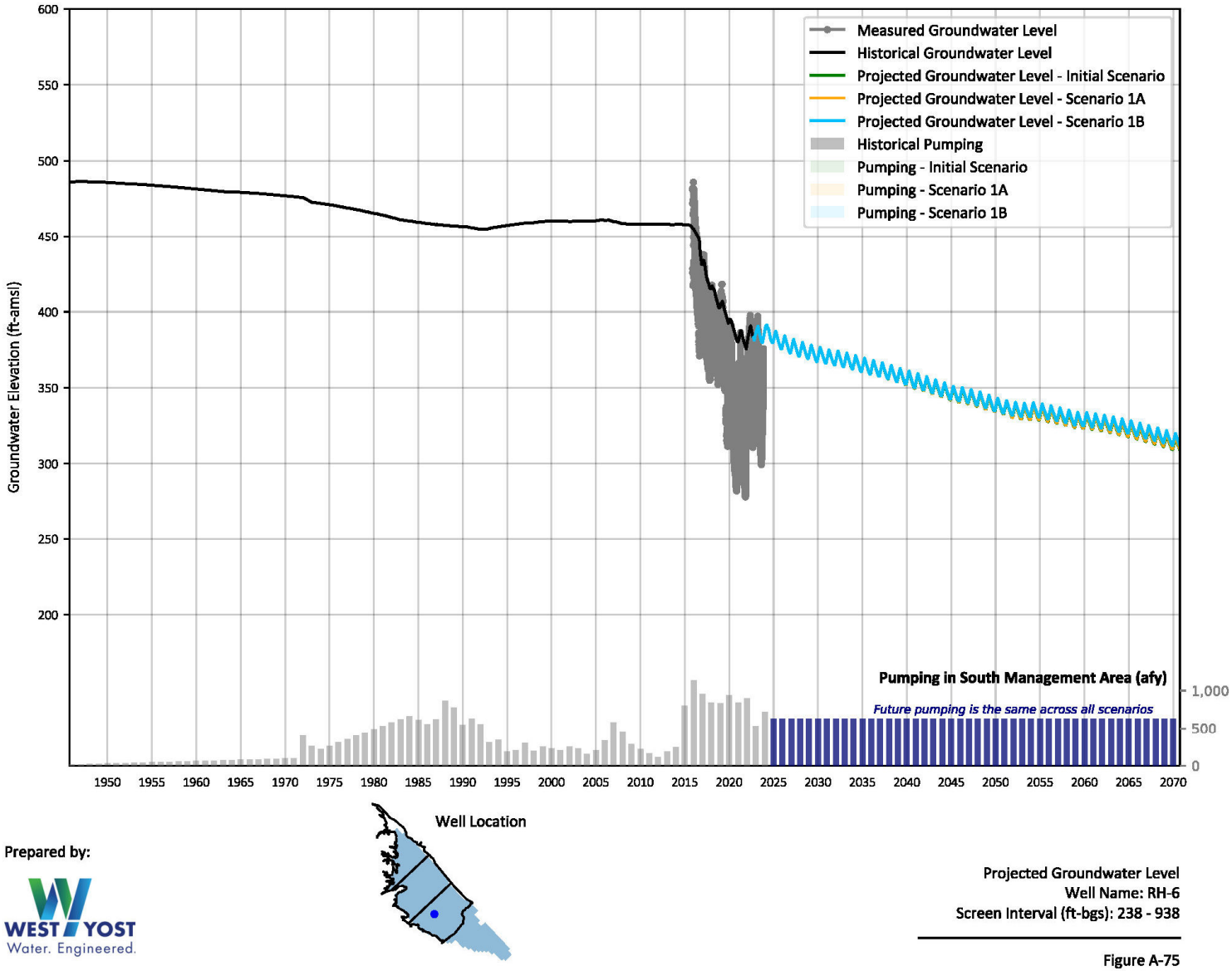
SMA:

- Groundwater levels decline continuously through 2070, with some interruptions from wet periods



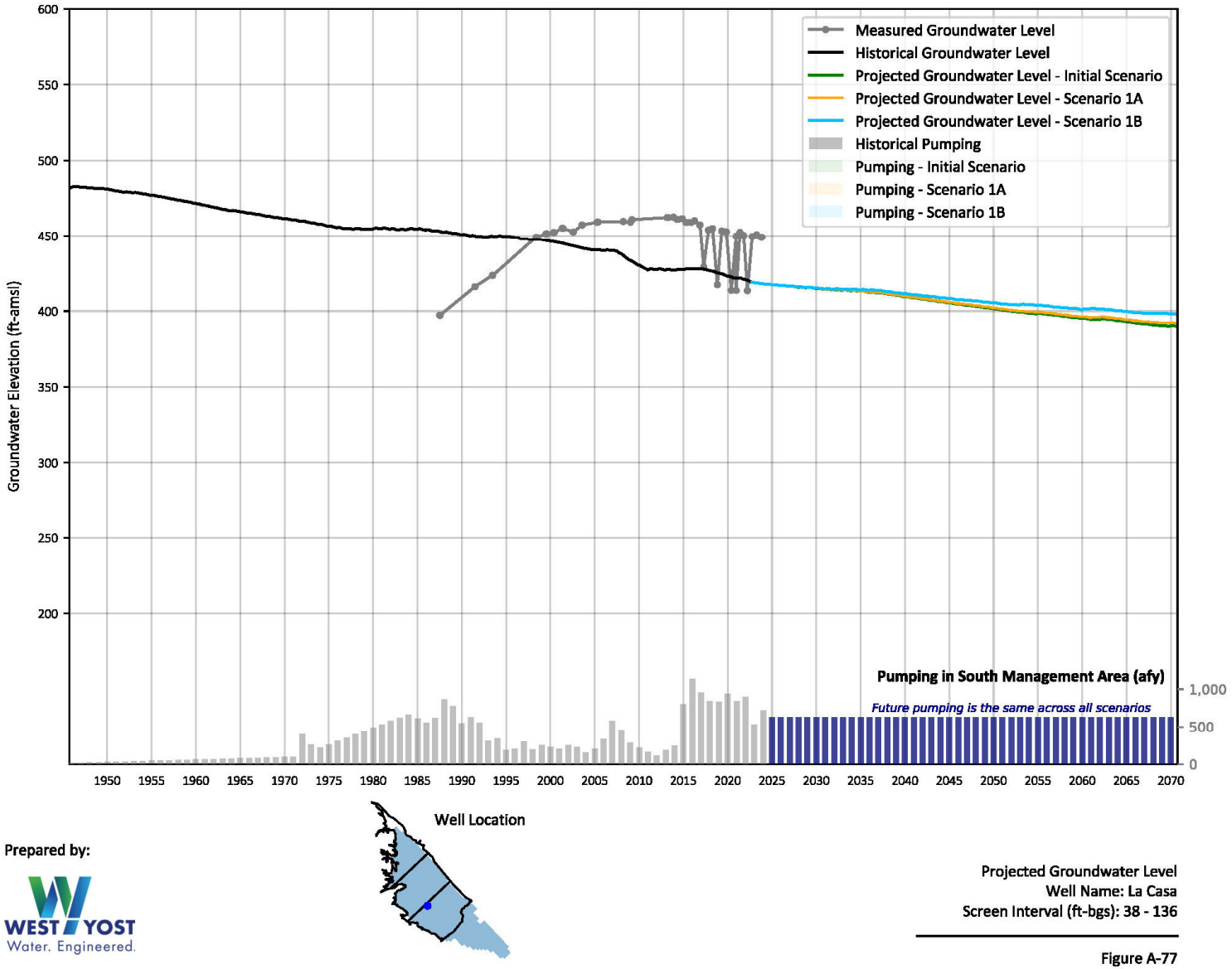
SMA:

- Groundwater levels decline continuously through 2070



SMA:

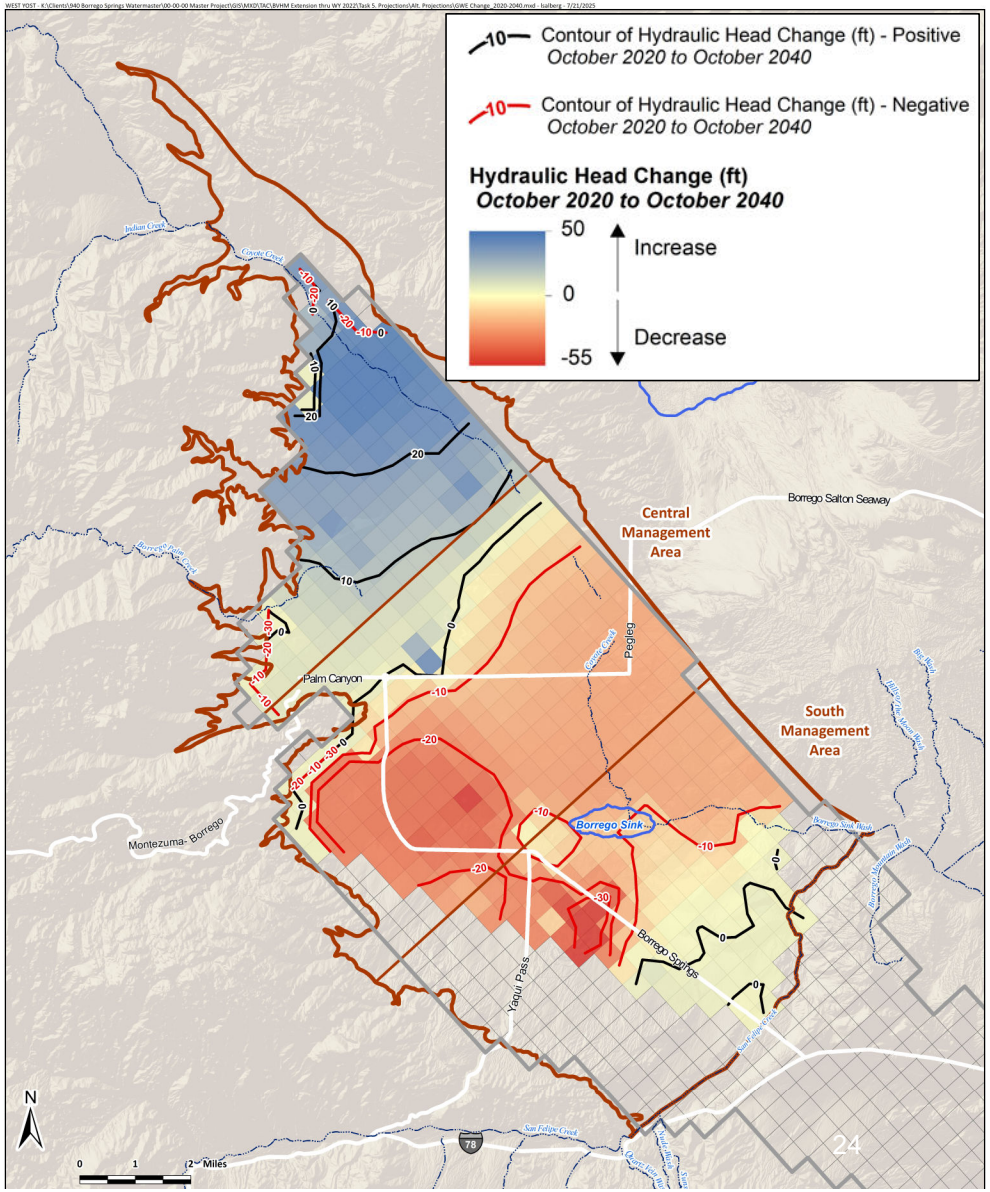
- Groundwater levels decline continuously through 2070 → includes areas with known calibration issues



Change in Groundwater Elevation

Initial Scenario

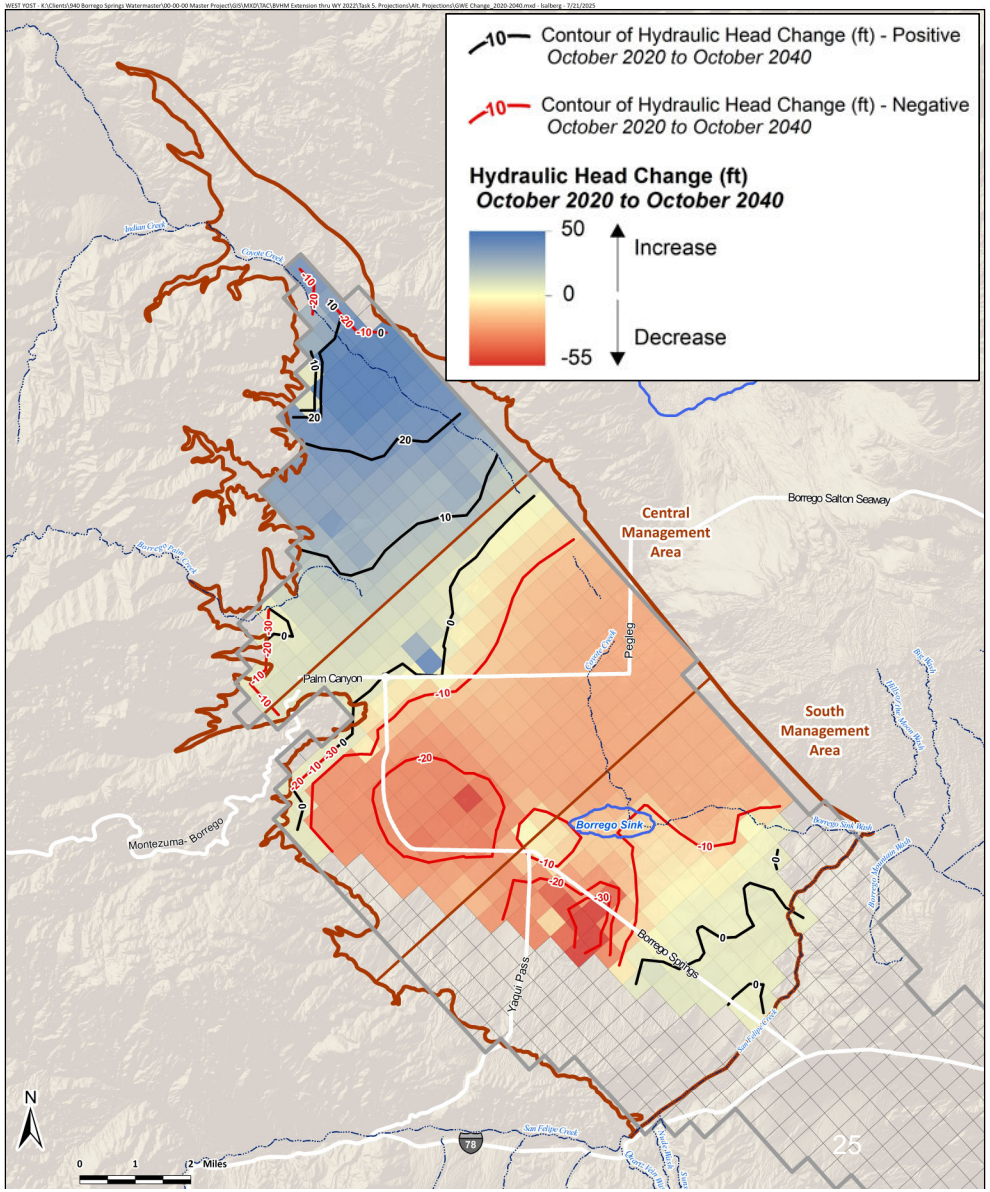
(WY 2040 minus 2020)



Change in Groundwater Elevation

Scenario 1A

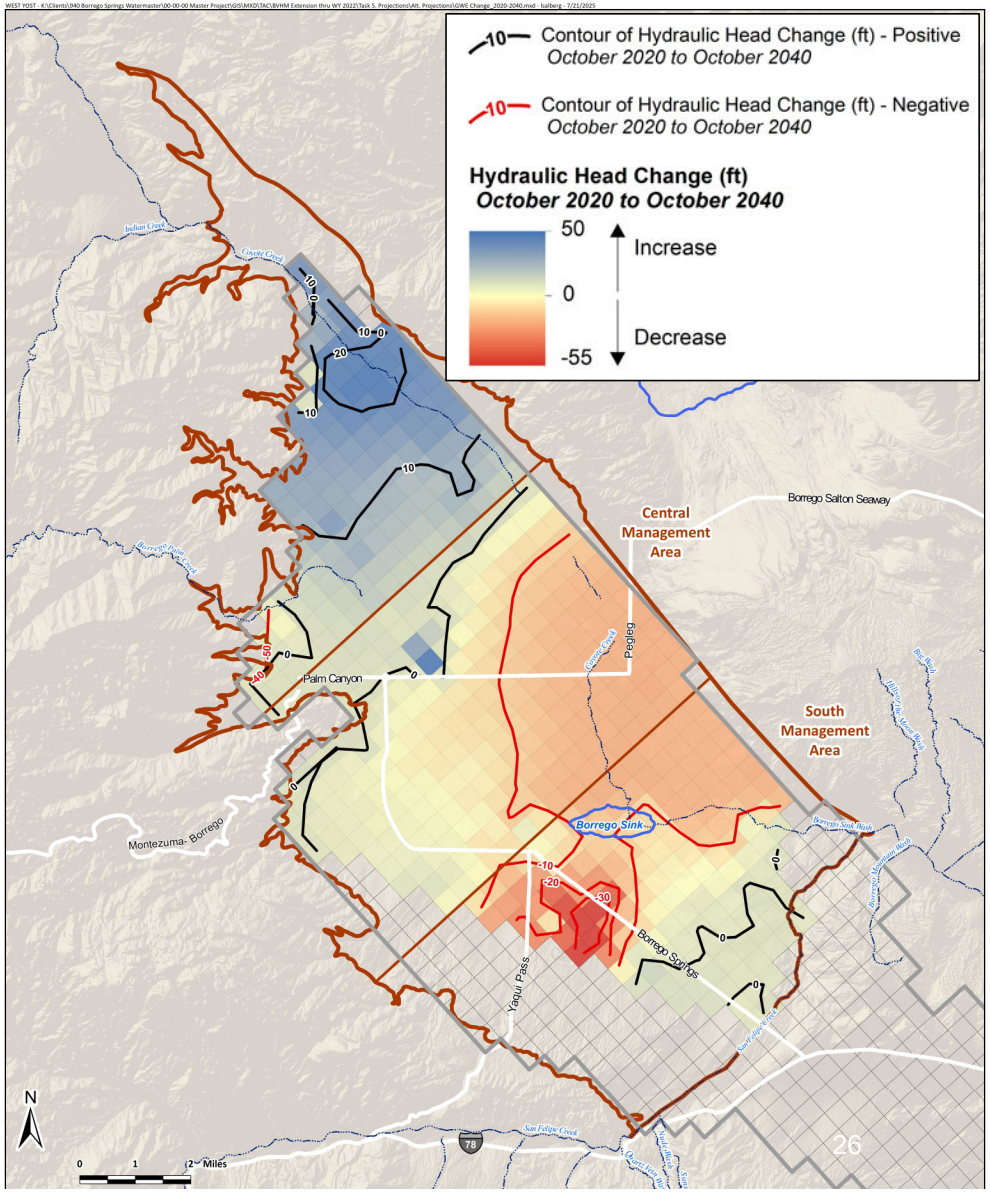
(WY 2040 minus 2020)



Change in Groundwater Elevation

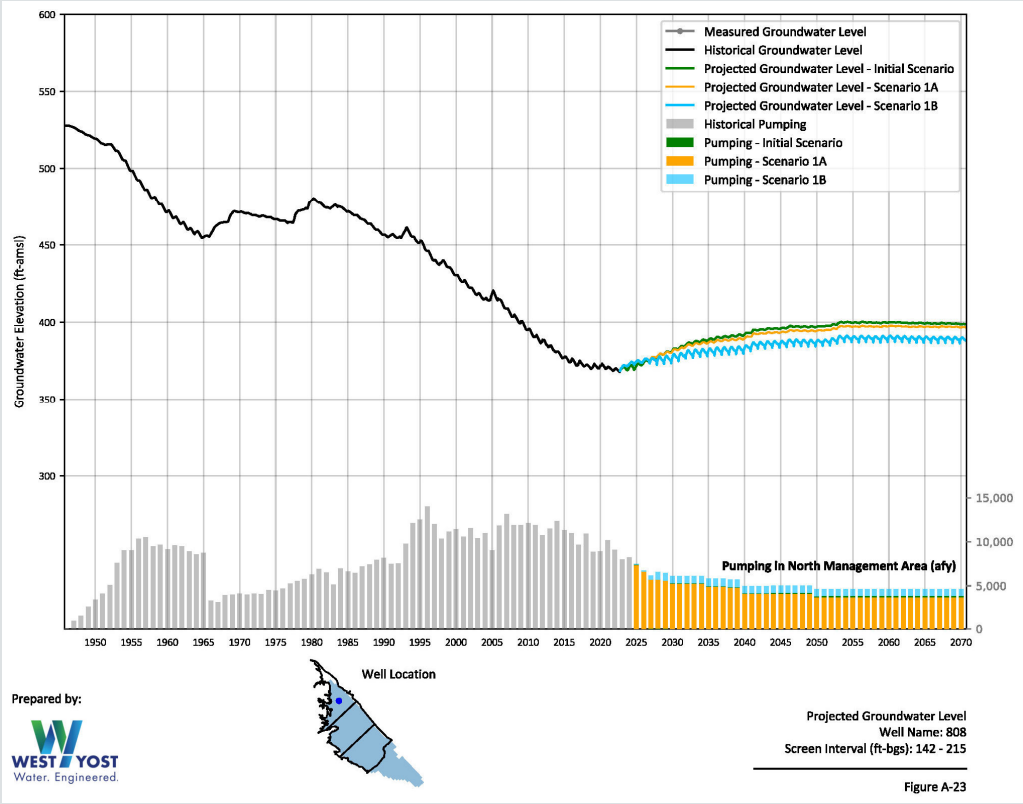
Scenario 1B

(WY 2040 minus 2020)



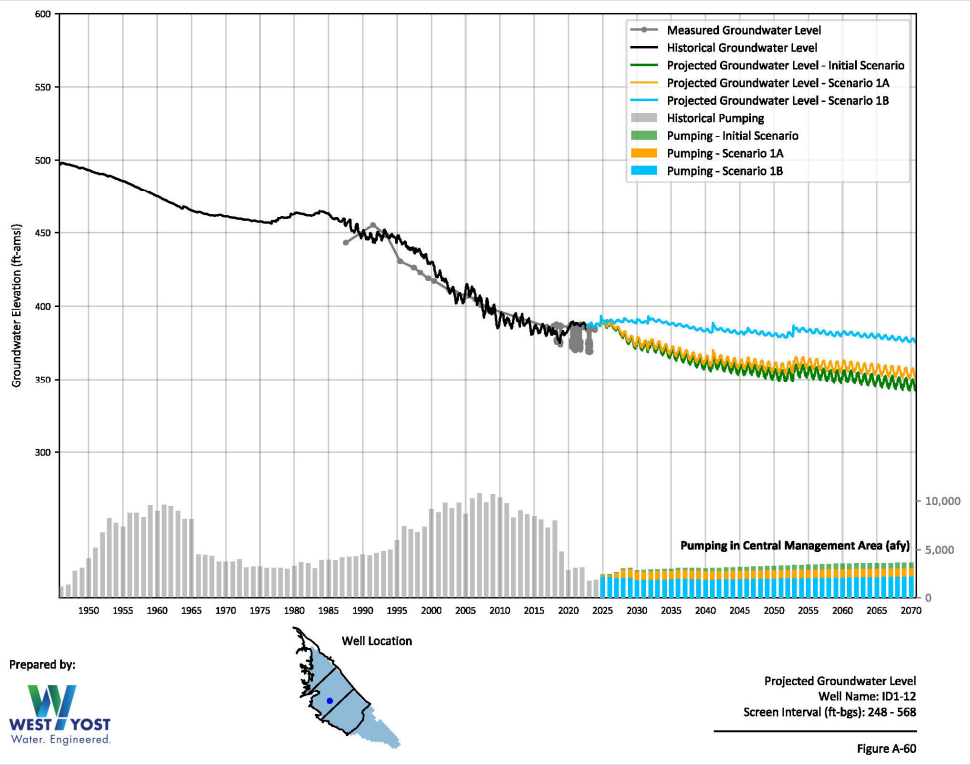
Observations & Interpretations – NMA

- NMA can likely accommodate additional pumping compared to Scenario 1B
  - Model results from Scenario 1B show rising groundwater levels followed by stability, even with increased pumping



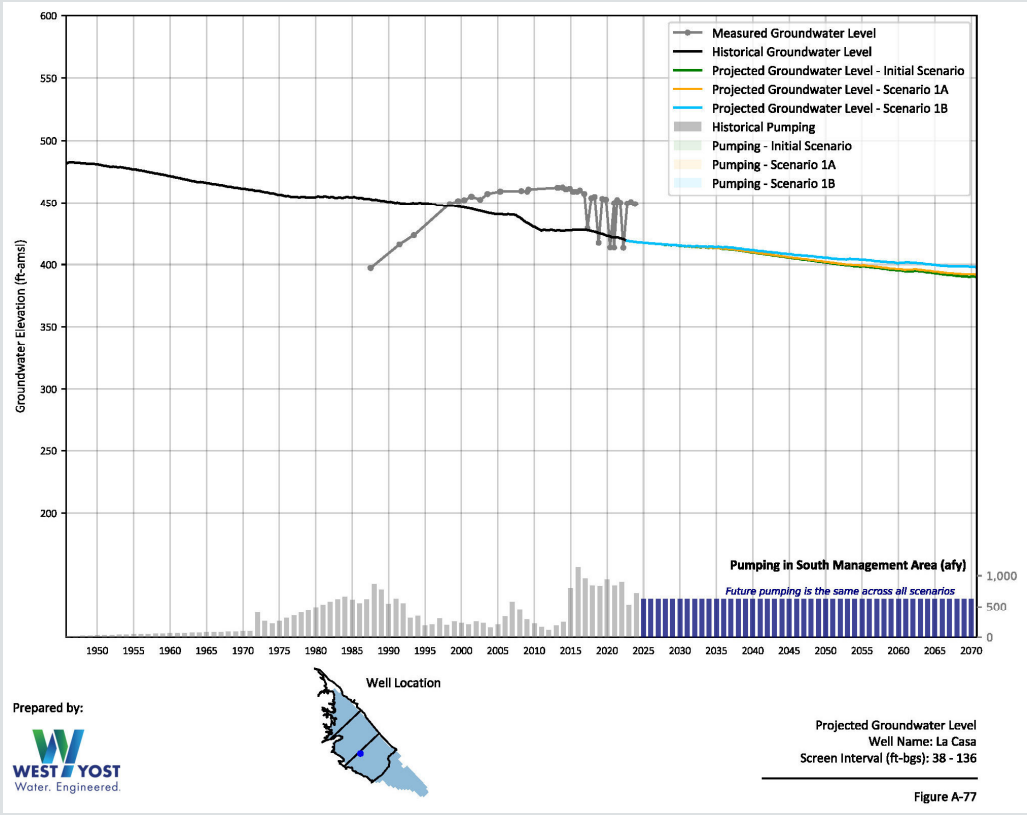
Observations & Interpretations – CMA

- Shifting pumping from the CMA to NMA can assist in stabilizing groundwater levels in the CMA
  - Additional pumping may need to be shifted from CMA to NMA → long-term, gradual declines in groundwater levels are predicted in the southern part of CMA in Scenario 1B
- BVHM can be used to better understand how much pumping should be shifted from CMA



Observations & Interpretations – SMA

- Model results indicate chronic lowering of groundwater levels in the SMA → this may be due to a recognized flaw(s) in the BVHM
  - Wells under-pump in the SMA under all scenarios (approx. 3% of total pumping)
  - HCM is likely incorrect, and hence, the BVHM is not well calibrated in this area
- HCM updates and BVHM recalibration are recommended to improve the model and confidence in the results, particularly in the CMA and SMA



Recommendations

- Additional maps should be prepared to display the projected groundwater-level changes from 2040-2070 for all scenarios to evaluate long-term sustainability
- The BVHM can be used to better understand the magnitude of pumping that should be shifted from the CMA to NMA to better distribute pumping and stabilize groundwater levels across the Basin
- The Hydrogeologic Conceptual Model (HCM) in the southern portion of the Basin should be updated, and the BVHM should be recalibrated thereafter, as part of the scope of work to redetermine the 2030 Sustainable Yield

Next Steps

- Per Board direction, Scenario 1C [pumping projections based on existing water rights only] should be developed, run with the BVHM, and analyzed, since groundwater levels in the SMA and CMA are projected in continue to decline after 2040 in Scenario 1B
- Prepare a revised TM documenting methods, results, conclusions, and recommendations from the simulation of Scenarios 1A, 1B, and 1C with the BVHM
  - This TM will supersede the existing TM that documents results from the Initial Scenario and was submitted to DWR → Replaces the original SGM grant deliverable
- Beginning in WY 2027, proceed with the Board-approved scope of work to redetermine the 2030 Sustainable Yield
- TAC members to provide feedback for Board, if any, by **August 15, 2025**.

Borrego Springs Watermaster
Technical Advisory Committee Meeting
August 7, 2025
AGENDA ITEM IV

To: Technical Advisory Committee (TAC)

From: Andy Malone, PG (West Yost), Technical Consultant

Date: August 1, 2025

Subject: Updating Sustainable Management Criteria – Groundwater Levels and Storage

Background and Objectives

The Borrego Springs Watermaster submitted to the California Department of Water Resources (DWR) its Judgment and Groundwater Management Plan (GMP) as an alternative Groundwater Sustainability Plan (GSP) for the Borrego Springs Subbasin (Basin) on June 25, 2021 to comply with the requirements of the Sustainable Groundwater Management Act of 2014 (SGMA). Together, the Judgment and GMP represent the Physical Solution for the Basin to achieve its Sustainability Goal by 2040, which is defined as operating the Basin at its Sustainable Yield without causing Undesirable Results. On February 25, 2025, the DWR approved the Judgment/GMP as an alternative GSP but also listed several Recommended Corrective Actions (RCAs) that should be implemented by the Watermaster to maintain the approval status of the Judgment/GMP.

Title 23 § 356.4 of the California Code of Regulations requires an assessment of GSPs once every five years (GMP Assessment Report). The first GMP Assessment Report is due to the DWR by June 25, 2026. Watermaster staff has developed an annotated outline of the GMP Assessment Report consistent with DWR guidance documents.[1] The DWR expects that the RCAs will be implemented by the Watermaster and described in the GMP Assessment Report.

The Judgment requires compliance with SGMA and calls for the redetermination of the Sustainable Yield once every five years through 2035. The Watermaster Board approved a redetermine Sustainable Yield of 7,952 acre-feet per year (afy) at their December 9, 2025 Board meeting under the condition that the recalibrated Borrego Valley Hydrologic Model (BVHM) be used to predict future groundwater conditions in the Basin under future groundwater pumping plans and climatic conditions to: (i) assess the long-term sustainability under a Rampdown to the 2025 Sustainable Yield (*i.e.* response of groundwater-levels and change in groundwater storage) and (ii) support the GMP Assessment Report. The redetermination of the Sustainable Yield and the 5-year Assessment Report may necessitate updates to the GMP. Many of the updates to the GMP will include a process to utilize "new information" collected since the GMP was first published in 2020 to update the Sustainable Management Criteria (SMC) in the GMP.

[1] Included in the agenda package for the December 18, 2023 TAC meeting at: https://borregospringswatermaster.com/wp-content/uploads/2023/12/VII.-5-Year-GMP-Assessment.pdf

The objective of this memorandum is to describe a proposed technical approach for utilizing new information to update the SMC in the current GMP for the Sustainability Indicators: (i) chronic lowering of groundwater levels and (ii) reduction in groundwater storage (and solicit TAC feedback).

Sustainable Management Criteria in the Current GMP

SMC terminology is defined by DWR[2] and are summarized below:

> **Sustainability Goal:** A Sustainability Goal is a qualitative description of the objectives and desired conditions of the groundwater basin, how the basin will get to that desired condition, and why implementation of management actions will result in sustainability.
>
> **Undesirable Result:** Undesirable Results are "significant and unreasonable groundwater conditions" that occur when Minimum Thresholds are exceeded for specific sustainability indicators.
>
> **Minimum Threshold:** A minimum threshold is the quantitative value that represents the groundwater conditions at a representative monitoring site that, when exceeded individually or in combination with Minimum Thresholds at other monitoring sites, may cause an undesirable result(s) in the basin.
>
> **Measurable Objective:** Measurable Objectives are quantitative goals that reflect the basin's desired groundwater conditions and allow the basin to achieve the Sustainability Goal by 2040. Measurable Objectives should be set such that there is a reasonable margin of operational flexibility between the minimum threshold and measurable objective that will accommodate droughts, climate change, conjunctive use operations, or other groundwater management activities.
>
> **Interim Milestones:** Interim Milestones are used to track progress toward meeting the Basin's Sustainability Goal. Interim Milestones must be defined in five-year increments at each representative monitoring site using the same metrics as the measurable objective.

The current GMP defines SMC for each relevant Sustainability Indicator in the Basin. Table 1 identifies the sections and relevant tables in the GMP that describe and define SMC for the Sustainability Indicators of (i) chronic lowering of groundwater levels and (ii) reduction in groundwater storage.

Table 1. Sustainability Indicators and Sustainable Management Criteria in the Current GMP

Sustainable Management Criteria	Sustainability Indicator and GMP Sections	
	Groundwater Levels	Groundwater Storage
Sustainability Goal	Section 3.1	Section 3.1
Minimum Threshold	Section 3.3.1 Table 3-4 Table 3-5	Section 3.3.2

[2] Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents/Files/BMP-6-Sustainable-Management-Criteria-DRAFT_ay_19.pdf

Undesirable Result	Section 3.2.1	Section 3.2.2
Measurable Objective and Interim Milestones	Section 3.4.1 Table 3-7	Section 3.4.2 Table 3-8

A summary of each of the SMC described in the current GMP, and the methods that were used to develop the SMC, are described below.

Current SMC for Chronic Lowering of Groundwater Levels in the GMP

Sustainability Goal: The GMP identifies two groundwater-level conditions that will occur when the Sustainability Goal is met in the Basin:

1) Groundwater levels are at sufficient elevations to not cause Undesirable Results
2) Trends in groundwater levels are stable or increasing

Undesirable Result: The primary undesirable result associated with chronic lowering of groundwater levels is the loss of adequate water resources to support current and/or potential future beneficial uses and users.[3] Groundwater-level declines are considered significant and unreasonable if they result in:

- The complete dewatering of the Basin's upper aquifer in the Central Management Area, a key aquifer that beneficial users rely on for water supply.
- A lowering in the rate of production at pre-existing groundwater production wells below a rate needed to support the overlying beneficial use(s) in locations where alternative supplies are not technically or financially feasible for the well owner to absorb, either independently or with assistance from the Watermaster, or other available assistance/grant program(s). The GMP identifies that domestic and de minimis pumpers who cannot be connected to the existing municipal system are most sensitive and most likely to experience adverse effects of declining groundwater levels.

Representative Monitoring Wells: The GMP established Minimum Thresholds, Measurable Objectives, and Interim Milestones for static (non-pumping) groundwater elevations at 16 Representative Monitoring Wells located across the three management areas in the Basin.

Method for establishing Minimum Thresholds: The Minimum Thresholds were established based on: (i) the top of well screens for municipal pumping wells (see Table 3-4 in the GMP) and (ii) an analysis of BVHM projections of groundwater levels through 2040 at the non-municipal wells under a model scenario that simulated relatively dry climate conditions (see Section 3.3.1 and Table 3-5 in the GMP). It should be noted that the BVHM projections used to set the Minimum Thresholds in Table 3-5 assumed that the pumping Rampdown to the Sustainable Yield of 5,700 afy would occur uniformly across all production wells and that no pumping would occur in the South Management Area.

Method for establishing Measurable Objectives and Interim Milestones: The Measurable Objectives and Interim Milestones were established based on BVHM projections of groundwater levels through 2040 that assumed the historical climate from 1960 through 2010 repeats for the period 2020 through

[3] Beneficial uses of groundwater in the Basin include: (1) municipal and domestic; (2) agricultural; (3) recreational; and (4) industrial.

2070 with 2030 climate change factors applied. Again, it should be noted that the BVHM projections assumed that the pumping Rampdown to the Sustainable Yield of 5,700 afy would occur uniformly across all production wells.

Current SMC for the Reduction in Groundwater Storage in the GMP

Sustainability Goal: The Sustainability Goal for groundwater in storage is the same as the goals set for groundwater levels because chronic lowering of groundwater levels is directly correlated to reductions in groundwater storage.

Undesirable Result: The Undesirable Results for reductions in groundwater storage are the same as those described for chronic lowering of groundwater levels.

Minimum Threshold: The minimum threshold for reduction in groundwater storage is a cumulative reduction of about 144,000 af from 2020 to 2040, the equivalent of about -7,200 afy (see Figure 3.3-3 in the GMP).

Method for establishing the Minimum Threshold: Changes in groundwater storage are directly correlated with changes in groundwater levels; hence, the minimum threshold for reductions in groundwater storage were established using the same methodology as was used to establish the Minimum Thresholds for chronic lowering of groundwater levels by using the results from the BVHM. Specifically, the minimum threshold for reductions in groundwater storage were based on BVHM projections through 2040 under a model scenario that simulated relatively dry climate conditions (see Section 3.3.2 in the GMP).

Measurable Objective and Interim Milestones: The measurable objective for the reduction of groundwater storage is the cumulative reduction of 72,000 af by 2040. Interim Milestones are defined for 2020, 2025, 2030, and 2035 and increase from 0 af in 2020 to 76,600 af removed from storage by 2035 (see Table 3-8).

Method for establishing Measurable Objectives and Interim Milestones: The Measurable Objectives and Interim Milestones for reductions in groundwater storage were established using the results of BVHM runs. Specifically, the Measurable Objectives and Interim Milestones for reductions in groundwater storage were based on BVHM projections through 2040 under a model scenario that simulated relatively dry climate conditions and a linear reduction in pumping from current rates to the Sustainable Yield of 5,700 afy in 2040 (see Section 3.4.2 in the GMP). All Interim Milestones were established using model results, except for the 2020 milestone, which used spring 2018 groundwater-levels and observed trends (consistent with the method used for setting the 2020 milestone for groundwater levels).

Reasons for Updating the Sustainable Management Criteria

There are four main reasons for updating the SMC in the GMP:

1) **In some cases, the current SMC are unreasonable and illogical.** Through implementation of various technical tasks, Watermaster staff have identified illogical SMC established in the GMP. Specifically, the Minimum Thresholds at some representative monitoring sites in the Basin are set at higher elevations than the Measurable Objectives, which is illogical. The methods used to establish these Measurable Objectives and Minimum Thresholds are not always described clearly in the GMP, so the reasons for these discrepancies are not clearly known.

2) **In some cases, the current SMC were based on unrealistic BVHM projection scenarios.** The methods to establish the Minimum Thresholds, Measurable Objectives, and Interim Milestones often relied upon BVHM projections of pumping and groundwater levels through WY 2070 (and particularly, for WY 2040). However, these BVHM projections assumed that the pumping Rampdown to the Sustainable Yield of 5,700 afy would occur gradually and uniformly across all production wells in the Basin, which was the best available approach at the time. As we have learned in the first four years of implementation, the pumping reductions to the Sustainable Yield by 2040 will instead occur incrementally and differently between the various water use sectors and at the individual wells.

3) **The DWR has issued Recommended Corrective Actions (RCAs) in the current GMP.** The RCAs that pertain to SMC for chronic lowering of groundwater levels and reductions in groundwater storage are summarized below:

   - **RCA 3** pertains to chronic lowering of groundwater levels. In summary, the DWR recommends that the GMP be updated to clearly articulate the rationale and methods used to establish SMC for Minimum Thresholds, Measurable Objectives, and Interim Milestones and clarify how measured groundwater levels will be used to support BVHM refinements and analyze progress toward sustainability. The DWR is particularly concerned with establishing Minimum Thresholds that will avoid adverse impacts to the most sensitive beneficial uses and users, primarily shallow domestic well users, during the implementation of the pumping Rampdown.

   - **RCA 4** pertains to reductions in groundwater storage. In summary, the DWR recommends to clearly articulate the rationale and methods used to establish a quantitative Minimum Threshold, Measurable Objective, and Interim Milestones and clarify how measured groundwater levels will be used to analyze progress toward sustainability.

4) **New information is available.** The DWR's guidance documentation titled: *A Guide To Annual Reports, Periodic Evaluations, And Plan Amendments*[4] recommends that new information or data available since the publication of the GMP be evaluated to determine if the "new information warrants changes to any aspect of the Plan, including the evaluation of the basin setting, Measurable Objectives, Minimum Thresholds, or the criteria defining Undesirable Results." These new data/information include:

   - Newly-collected monitoring data/information, such as: groundwater-pumping data; groundwater-level data; well construction data; etc.

   - The expanded monitoring network of wells.

   - The updated and recalibrated BVHM and its revised estimate of the Sustainable Yield of 7,952 afy.

[4] Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents/Files/GSP-Implementation-Guidance-Report.pdf

- Pumping projections by well for the period WY 2023-2070 which were developed based on discussions with all major pumpers in the Basin.
- New BVHM runs for the period WY 2023-2070 that simulate the pumping Rampdown to the revised Sustainable Yield of 7,952 afy. These BVHM projections of future groundwater levels and storage in the Basin are currently in progress and will be more realistic and reliable predictions of future groundwater level and storage conditions.

Proposed Method for Updating SMC for Chronic Lowering of Groundwater Levels:

Based on the new data and information available (or that will be available in the immediate future) and the DWR RCAs, the Technical Consultant recommends the following approach to develop proposed updates for Minimum Thresholds, Undesirable Results, Measurable Objectives, and Interim Milestones for chronic lowering of groundwater levels in the GMP Assessment Report:

Minimum Thresholds and Undesirable Results

1) **Identify a *Groundwater-Elevation Use Threshold* (GWE-UT) at all currently active pumping wells in the Basin.** Each GWE-UT is well specific and is based on well use, well location, well construction, estimated pumping drawdown, and appropriate "safety factors" to account for uncertainty in well conditions and operations. Static groundwater levels ***above*** the GWE-UT are assumed to be sufficient to maintain desired pumping rates, and therefore, are ***protective*** of the well's beneficial use. Static groundwater levels ***below*** the GWE-UT are assumed to be ***not protective*** of the well's beneficial use. Criteria for establishing the GWE-UT for each category of well use are described below (see Figure 1 for graphical explanation):

    a. **Municipal Wells**. Borrego Water District has identified the specific wells for which GWE-UTs should be established: ID1-12, ID4-9, ID4-11, ID5-5, and ID5-15. Pumping levels in these wells must remain above the uppermost well screens to maintain desired pumping rates and avoid well degradation. Therefore, the GWE-UT for each BWD well is established using the following formula:

    GWE-UT (ft-amsl) = Top of Well Screens (ft-amsl) + Drawdown (ft) + 20-foot Safety Factor(ft)

    Magnitudes of pumping drawdown are known for each well based on measured groundwater-level data.

    b. **Rams Hill Wells (deep aquifer system)**. These wells primarily pump from deep confined aquifers in the SMA, and hence, experience greater magnitudes of drawdown per unit rate of pumping. Pumping levels in these wells must be maintained at least 20 feet above the bottom of the well screens to maintain desired pumping rates. Therefore, the GWE-UT for each deep Rams Hill well is established using the following formula:

    GWE-UT (ft-amsl) = Bottom of Well Screens (ft-amsl) + Drawdown (ft) + 20-foot Safety Factor (ft)

    Magnitudes of pumping drawdown are known for each well based on measured groundwater-level data.

    c. **Agricultural and Other Recreational Wells**. These wells primarily pump from the unconfined to semi-confined aquifers in the NMA and CMA. Pumping levels in these wells must be maintained at least 20 feet above the bottom of the well screens to

maintain desired pumping rates. Therefore, the GWE-UT for each well is established using the following formula:

GWE-UT (ft-amsl) = Bottom of Well Screens (ft-amsl) + Drawdown (ft) + 20-foot Safety Factor (ft)

Magnitudes of pumping drawdown *are not* known for each of these wells; however, based on the limited dataset of measured groundwater-level data, the magnitudes of pumping drawdown are not expected to exceed 40 feet at any well.

d. **Domestic and other Non-De Minimis Wells**. These wells primarily pump from the shallower, unconfined to semi-confined aquifers across the Basin. Pumping levels in these wells must be maintained at least 20 feet above the bottom of the well screens to maintain desired pumping rates. Therefore, the GWE-UT for each well is established using the following formula:

GWE-UT (ft-amsl) = Bottom of Well Screens (ft-amsl) + Drawdown (ft) + 20-foot Safety Factor (ft)

Because pumping rates from these wells are relatively low, the magnitudes of pumping drawdown are not expected to exceed 20 feet at any well.

2) **Prepare maps, by Management Area, of all currently active pumping wells labeled by the elevation of the GWE-UT and symbolized by 2014 groundwater levels above/below the GWE-UT**. See Figures 2a, 2b, and 2c for the NMA, CMA, and SMA, respectively. Each well is symbolized by (i) well use and (ii) the difference between the static groundwater elevation in 2014 (start of SGMA implementation) and the elevation of the GWE-UT. Wells with static groundwater levels *below* the GWE-UT in 2014 are excluded from the analysis since the groundwater-level declines that resulted in the assumed impairment of the beneficial use occurred prior to SGMA implementation. The maps also display the current groundwater-level monitoring network.

3) **Prepare similar maps described in (2) above, but for groundwater-elevation conditions in 2022** (i.e., end of the calibration period for the 2022 BVHM). See Figures 3a, 3b, and 3c for the NMA, CMA, and SMA, respectively. These maps indicate which wells, if any, have potentially experienced impairment of their beneficial uses due to declining groundwater levels by 2022.

4) **Prepare similar maps described in (2) above, but for projected groundwater-elevation conditions in 2040** (i.e., end of the pumping Rampdown to the Sustainable Yield). *These maps are in preparation, and hence, are not included in this memo*. These maps will indicate which wells, if any, will potentially experience impairment of their beneficial uses due to declining groundwater levels by 2040.

5) **Identify wells that may experience impairment of its beneficial use by 2040 due to declining groundwater levels.** Inspection of the maps in (3) and (4) will indicate the number and location of wells that may experience impairment of their beneficial uses. Implementation of projects or management actions may be necessary to mitigate the impairment of beneficial uses at these wells. That said, these wells are excluded from the analysis since their impairments are assumed to be mitigated.

6) **Select Representative Monitoring Wells**. Through analysis of the maps prepared in (3) and (4) above, define spatial groups of currently active pumping wells and assign the group to a nearby

monitoring well in the groundwater-level monitoring network. These monitoring wells become the updated set of Representative Monitoring Wells.

7) **Establish Minimum Thresholds**. From each group of pumping wells, choose the shallowest GWE-UT as a Minimum Threshold to assign to the Representative Monitoring Well. If future groundwater levels remain above the Minimum Threshold, then the beneficial uses of the group of pumping wells is assumed to be protected.

8) **Define Undesirable Result.** An Undesirable Result for chronic lowering of groundwater levels occurs when measured groundwater elevations decline below a Minimum Threshold at a Representative Monitoring Well in a Management Area for two consecutive years. Such an occurrence could cause a lowering in the rate of production at the pre-existing pumping wells below the rate needed to support the overlying beneficial uses.

Measurable Objectives and Interim Milestones

1) **Develop groundwater pumping projections for the period WY 2023-2070**. Watermaster staff has met with all major pumpers in the Basin to develop projections for groundwater pumping by well for the period WY 2023-2070. Pumping projections include (i) metered pumping data for WY 2023 to 2024, and (ii) projections of pumping for WY 2025-2070 developed through conversations with pumpers in the Basin.

2) **Perform BVHM runs for the period WY 2023-2070 under assumed future climate conditions**. The pumping projections are translated into BVHM input files, and the BVHM is run through 2070 to predict future groundwater levels in the Basin under a repeated hydrology assumption using the 47-year historical climate period of WY 1975-2022.

3) **Set the Interim Milestones and Measurable Objectives.** Set the Interim Milestones at the Representative Monitoring Wells based on the BVHM-predicted groundwater elevations in 2025, 2030, and 2035. Set the Measurable Objectives at the Representative Monitoring Wells based on the BVHM-predicted groundwater elevation in 2040. See Figure 4 as a conceptual example.

Analysis of Progress Toward Sustainability

Progress towards achieving sustainability for chronic lowering of groundwater levels will be monitored and tracked using measured groundwater levels at the Representative Monitoring Wells. These results will be published in SGMA annual reports.

Proposed Method to Update SMC for Reductions in Groundwater Storage:

Based on the new data and information available (or that will be available in the immediate future) and the DWR RCAs, the Technical Consultant recommends the following approach to develop and propose updates for Minimum Thresholds, Undesirable Results, Measurable Objectives, and Interim Milestones for reductions in groundwater storage in the GMP Assessment Report:

Minimum Thresholds and Undesirable Results

1) **Set the Minimum Threshold for groundwater storage to be the cumulative mining of storage allowed by the Judgment over the pumping rampdown period 2020-2040.** This volume of groundwater mining is 156,560 acre-feet, which is the maximum volume allowed by the Judgment. Figure 5 is a time-series chart that graphically shows the maximum groundwater

mining allowed by the Judgment during the pumping rampdown to the Sustainable Yield of 7,952 afy over the period 2020-2040. No additional mining after 2040 is allowed by the Judgment.

2) **Define Undesirable Result.** An Undesirable Result for reductions in groundwater storage occurs when cumulative groundwater mining exceeds 156,560 acre-feet during 2020-2040 or thereafter. Such an occurrence would represent overdraft conditions that are not permitted by the Judgment.

Measurable Objectives and Interim Milestones

1) **Develop groundwater pumping projections for the period WY 2023-2070**. Watermaster staff has met with all major pumpers in the Basin to develop projections for groundwater pumping by well for the period WY 2023-2070. Pumping projections include (i) metered pumping data for WY 2023 to 2024, and (ii) projections of pumping for WY 2025-2070 developed through conversations with pumpers in the Basin.

2) **Set the Interim Milestones and Measurable Objectives.** Set the Interim Milestones based on the pumping projections and the associated cumulative groundwater mining that is projected to occur by 2025, 2030, and 2035. Set the Measurable Objective based on the pumping projections and the associated cumulative groundwater mining that is projected to occur by 2040 (40,000 acre-feet). See Figure 5.

ANALYSIS OF PROGRESS TOWARD SUSTAINABILITY

Progress towards achieving sustainability for reductions in storage will be monitored and tracked using measured changes in groundwater elevations and storage and/or BVHM hindcasts of Basin conditions during periodic update/recalibration of the BVHM. These results will be published in SGMA annual reports.

Consistency with DWR Guidance

The proposed methods described above: (i) are consistent with DWR guidance[4,6] on setting and periodically updating SMC for chronic lowering of groundwater levels and reductions in storage and (ii) address the RCAs provided by the DWR. The methods consider the current understanding of the basin setting, the overlying beneficial uses/users of groundwater, historical and new monitoring data/information, and BVHM projections of groundwater levels and calculated projections of groundwater mining from storage.

Next Steps

The Technical Consultant will describe this proposed technical approach to developing and recommending updates to the SMC in the GMP Assessment Report and will be prepared to receive TAC feedback.

The TAC is asked to provide any written feedback to Andy Malone (amalone@westyost.com) and Lauren Salberg (lsalberg@westyost.com) by August 29, 2025. The TAC is asked to CC: the entire TAC membership in its email correspondence with the Technical Consultant.

Enclosures

Figure 1. Proposed Methods to Identify Groundwater-Elevation Use Thresholds for Various Well Uses

Figure 2a. Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds – *North Management Area* [2014 groundwater conditions]

Figure 2b. Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds – *Central Management Area* [2014 groundwater conditions]

Figure 2c. Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds – *South Management Area* [2014 groundwater conditions]

Figure 3a. Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds – *North Management Area* [2022 groundwater conditions]

Figure 3b. Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds – *Central Management Area* [2022 groundwater conditions]

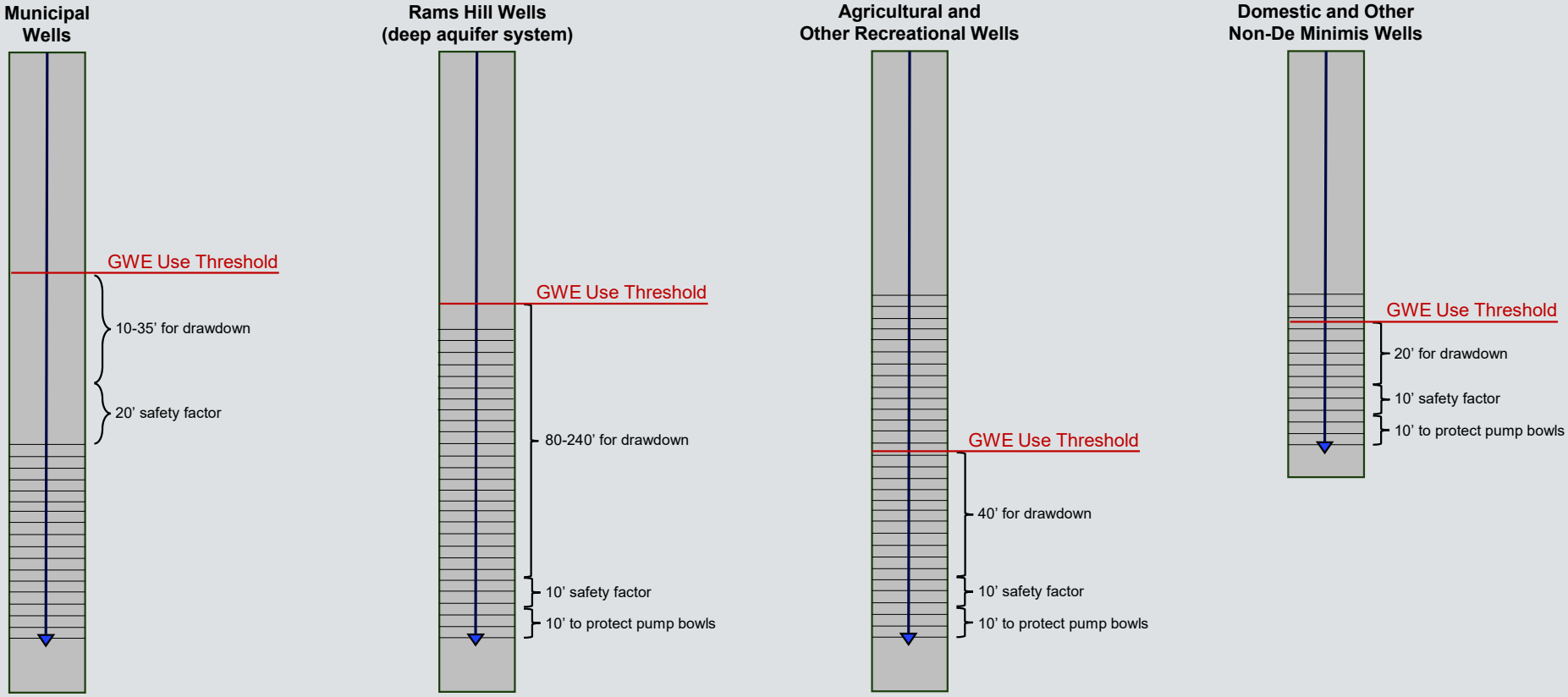
Figure 3c. Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds – *South Management Area* [2022 groundwater conditions]

Figure 4. Proposed Methods to Update Measurable Objectives and Interim Milestones – *Chronic Lowering of Groundwater Levels*

Figure 5. Proposed Sustainable Management Criteria for Reductions in Groundwater Storage

FIGURE 1

Proposed Methods to Identify *Groundwater-Elevation Use Thresholds* for Various Well Uses



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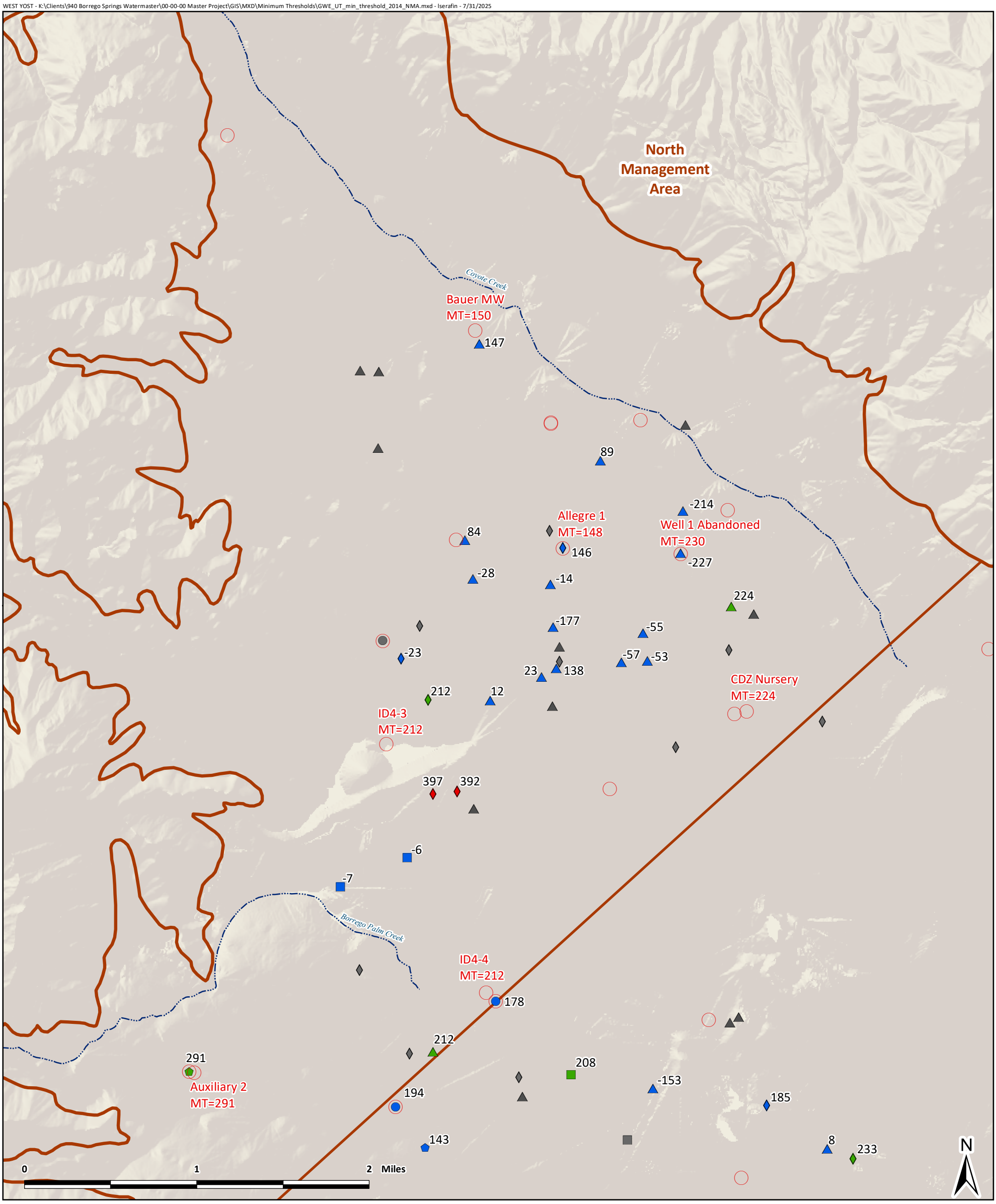


Water Level Above/Below the Groundwater-Elevation Use Threshold (2014)

- -50 - 0 ft
- 0 - 50 ft
- 50 - 100 ft
- 100 - 200 ft
- > 200 ft
- No well construction data

Well Use *(labeled by Groundwater-Elevation Use Threshold)*

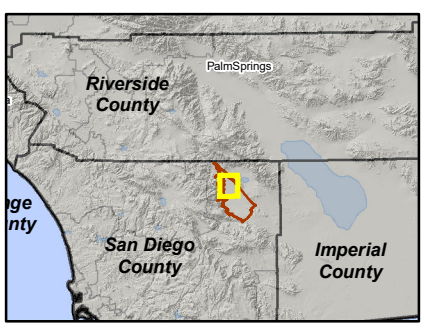
- 100 Agriculture
- Other
- Municipal
- Recreation
- De Minimis (unknown well status)

Proposed Minimum Thresholds at Proposed Representative Monitoring Wells

MT=100 Groundwater-Level Monitoring Network

Other features

Borrego Springs Subbasin with Management Area Divisions



Borrego Springs Watermaster
Groundwater Monitoring Plan

Figure 2a

Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds
North Management Area

Prepared by:

WEST YOST

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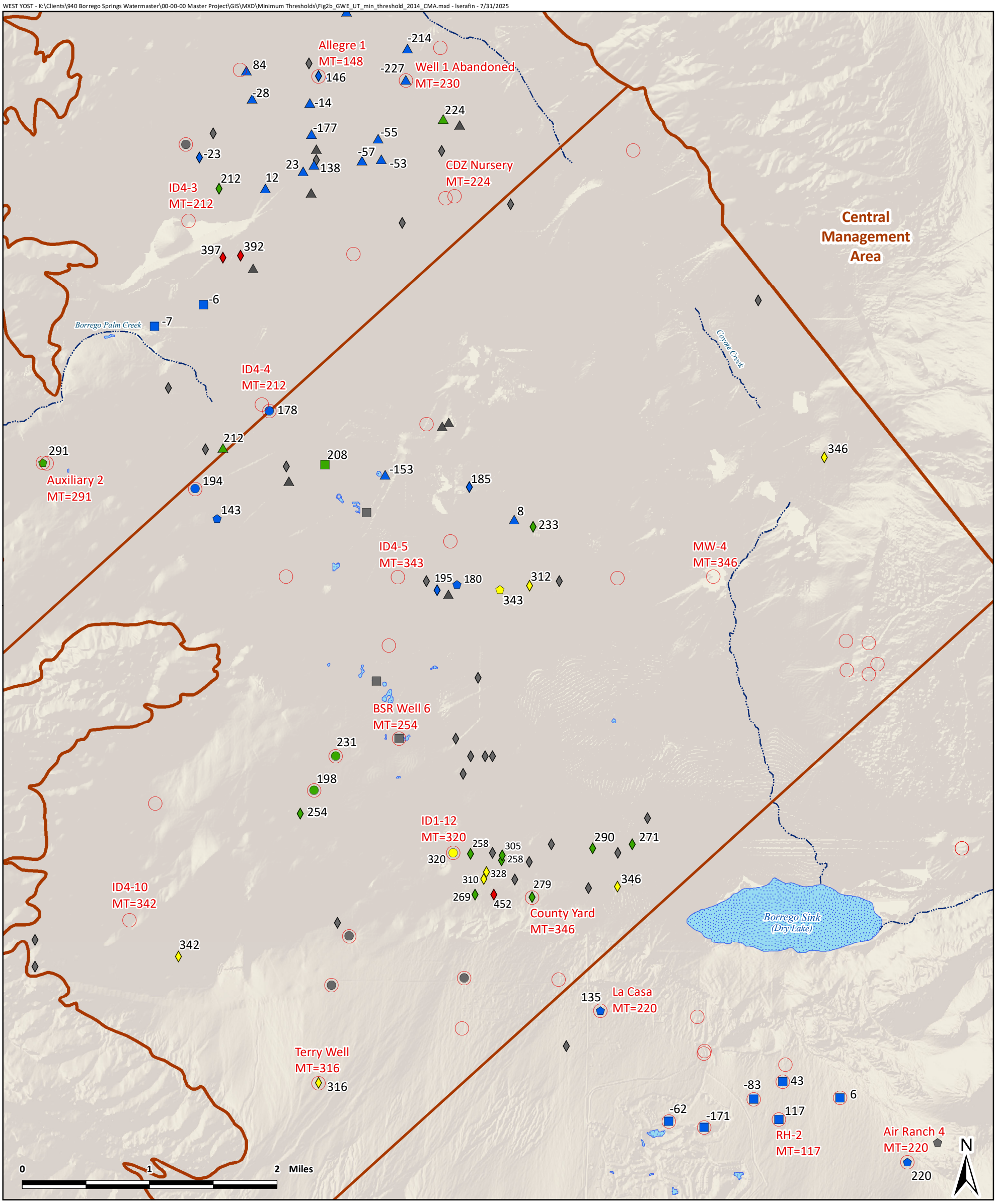

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Proposed Minimum Thresholds at Proposed Representative Monitoring Wells

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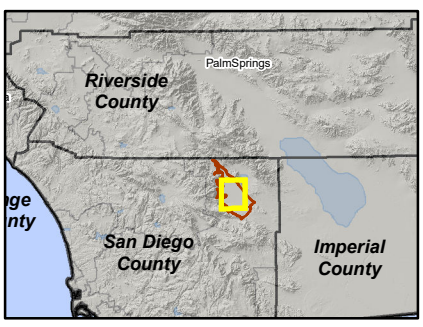
Other features

Borrego Springs Subbasin with Management Area Divisions



Borrego Springs Watermaster

Groundwater Monitoring Plan

Figure 2b

Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds

Central Management Area

Prepared by:

WEST YOST

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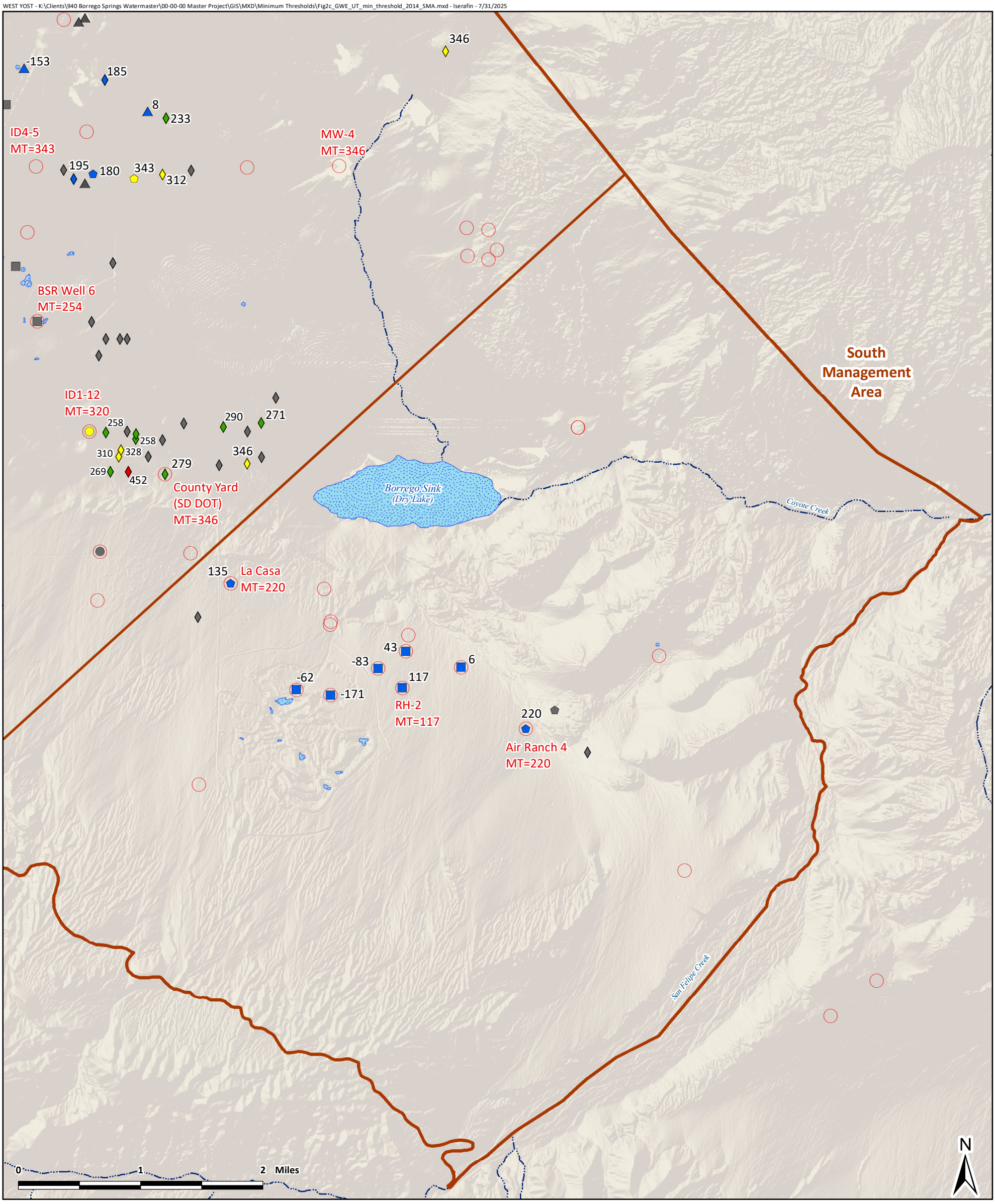

Water Level Above/Below the Groundwater-Elevation Use Threshold (2014)

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- 100 - 200 ft
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Well Use *(labeled by Groundwater-Elevation Use Threshold)*

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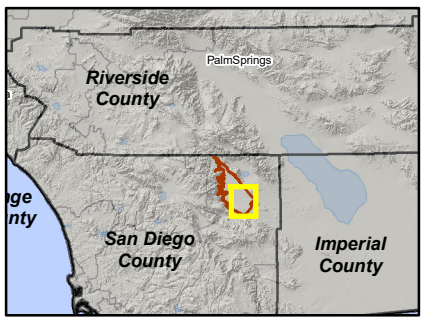
- Other
- Municipal
- Recreation
- De Minimis (unknown well status)

Proposed Minimum Thresholds at Proposed Representative Monitoring Wells

MT=100 Groundwater-Level Monitoring Network

Other features

Borrego Springs Subbasin with Management Area Divisions



Borrego Springs Watermaster

Groundwater Monitoring Plan

Figure 2c

Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds

South Management Area

Prepared by:

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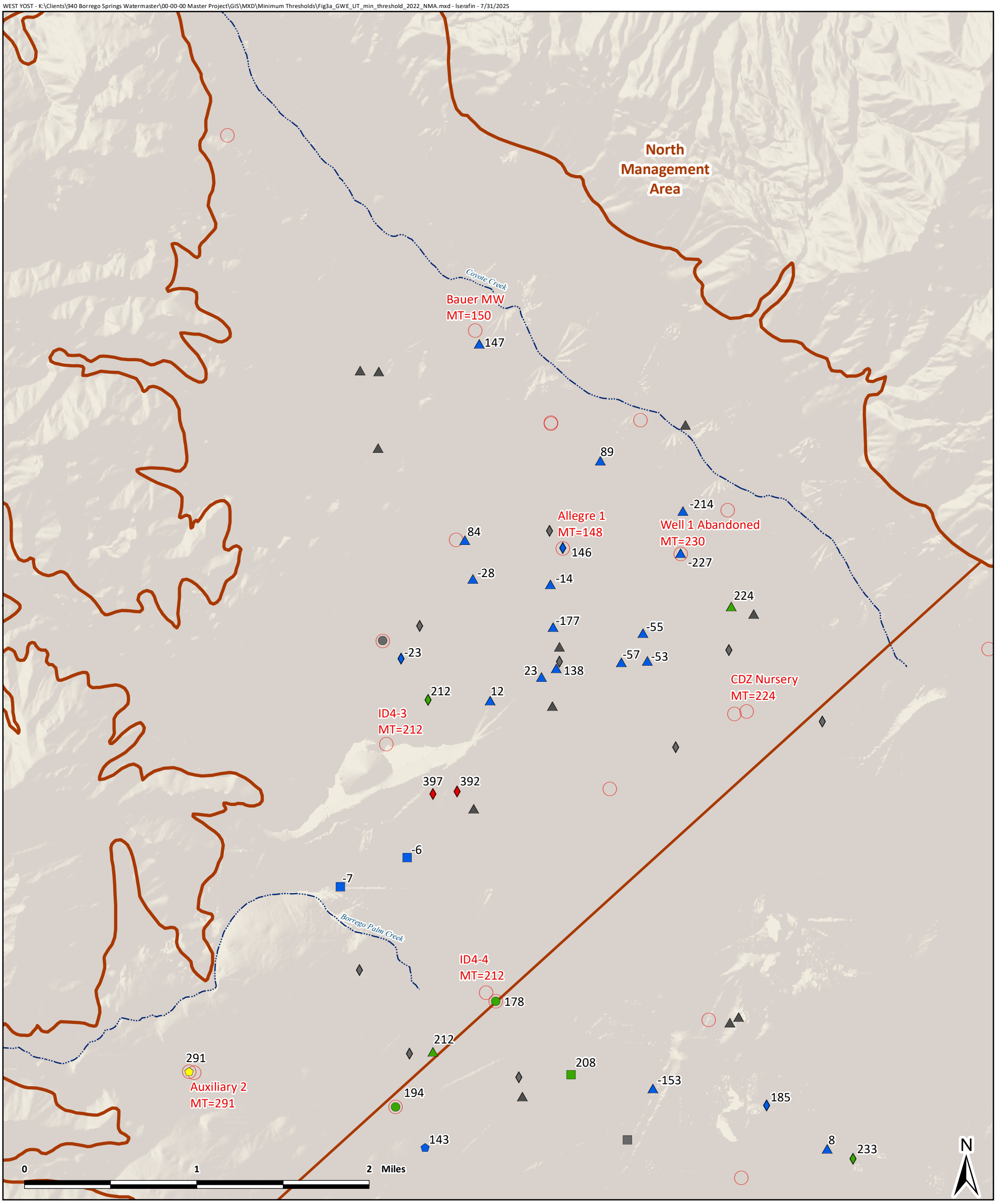

Water Level Above/Below the Groundwater-Elevation Use Threshold (2022)

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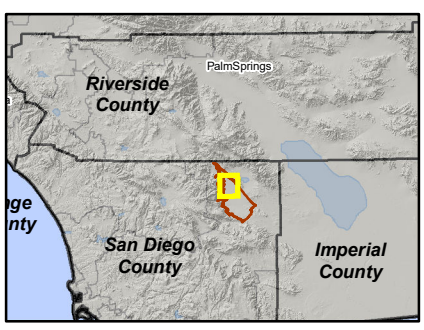
- Other
- Municipal
- Recreation
- De Minimis (unknown well status)

Proposed Minimum Thresholds at Proposed Representative Monitoring Wells

- MT=100 Groundwater-Level Monitoring Network

Other features

- Borrego Springs Subbasin with Management Area Divisions



Borrego Springs Watermaster
Groundwater Monitoring Plan

Figure 3a

Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds
North Management Area

Prepared by:

WEST YOST

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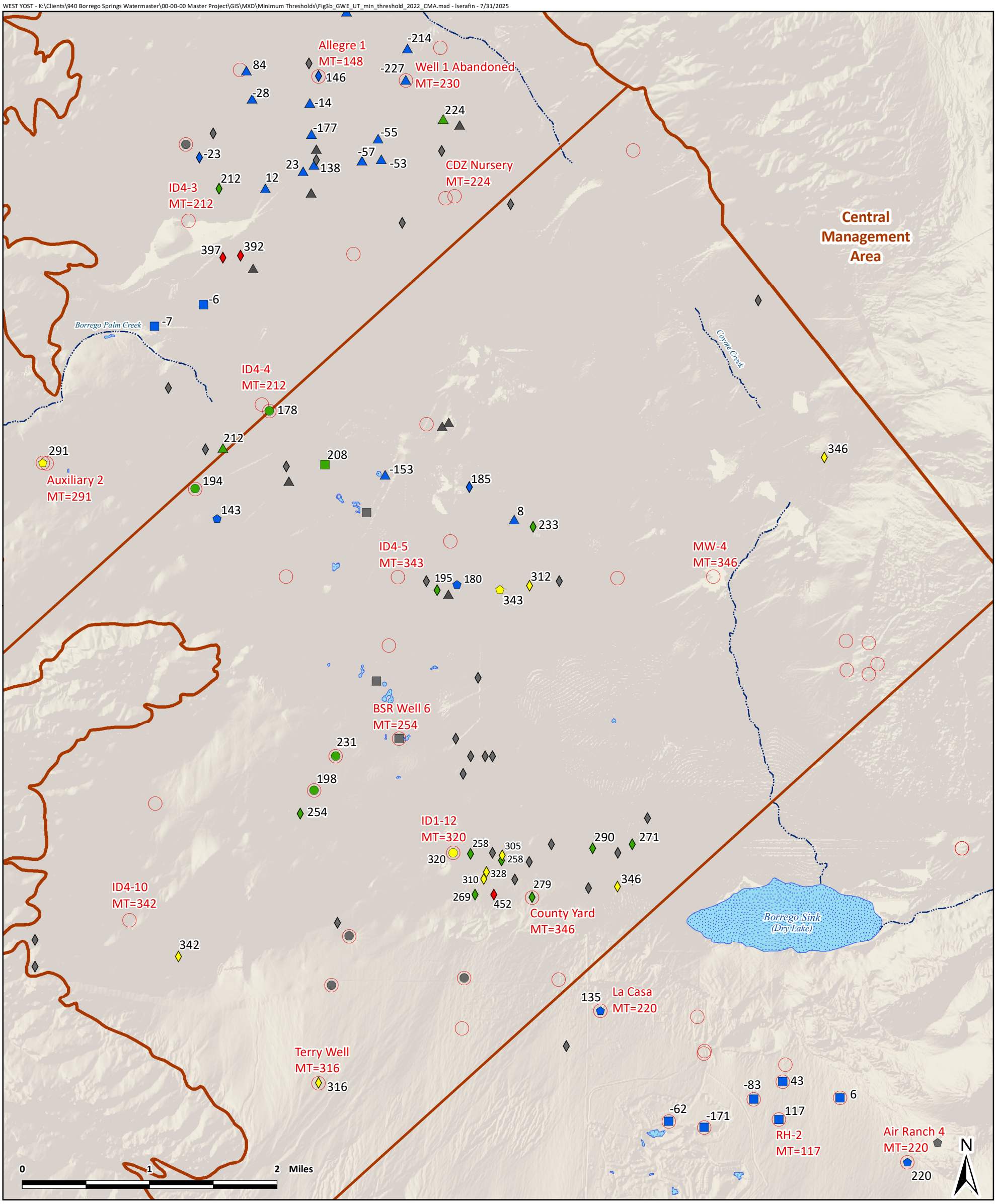

Water Level Above/Below the Groundwater-Elevation Use Threshold (2022)

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- 0 - 50 ft
- 50 - 100 ft
- 100 - 200 ft
- > 200 ft
- No well construction data

Well Use *(labeled by Groundwater-Elevation Use Threshold)*

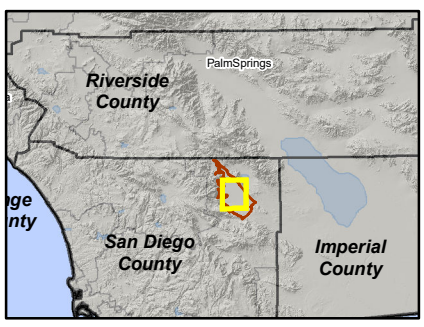
- Agriculture
- Municipal
- De Minimis (unknown well status)
- Other
- Recreation

Proposed Minimum Thresholds at Proposed Representative Monitoring Wells

- Groundwater-Level Monitoring Network

Other features

- Borrego Springs Subbasin with Management Area Divisions



Borrego Springs Watermaster
Groundwater Monitoring Plan

Figure 3b

Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds
Central Management Area

Prepared by:

WEST YOST

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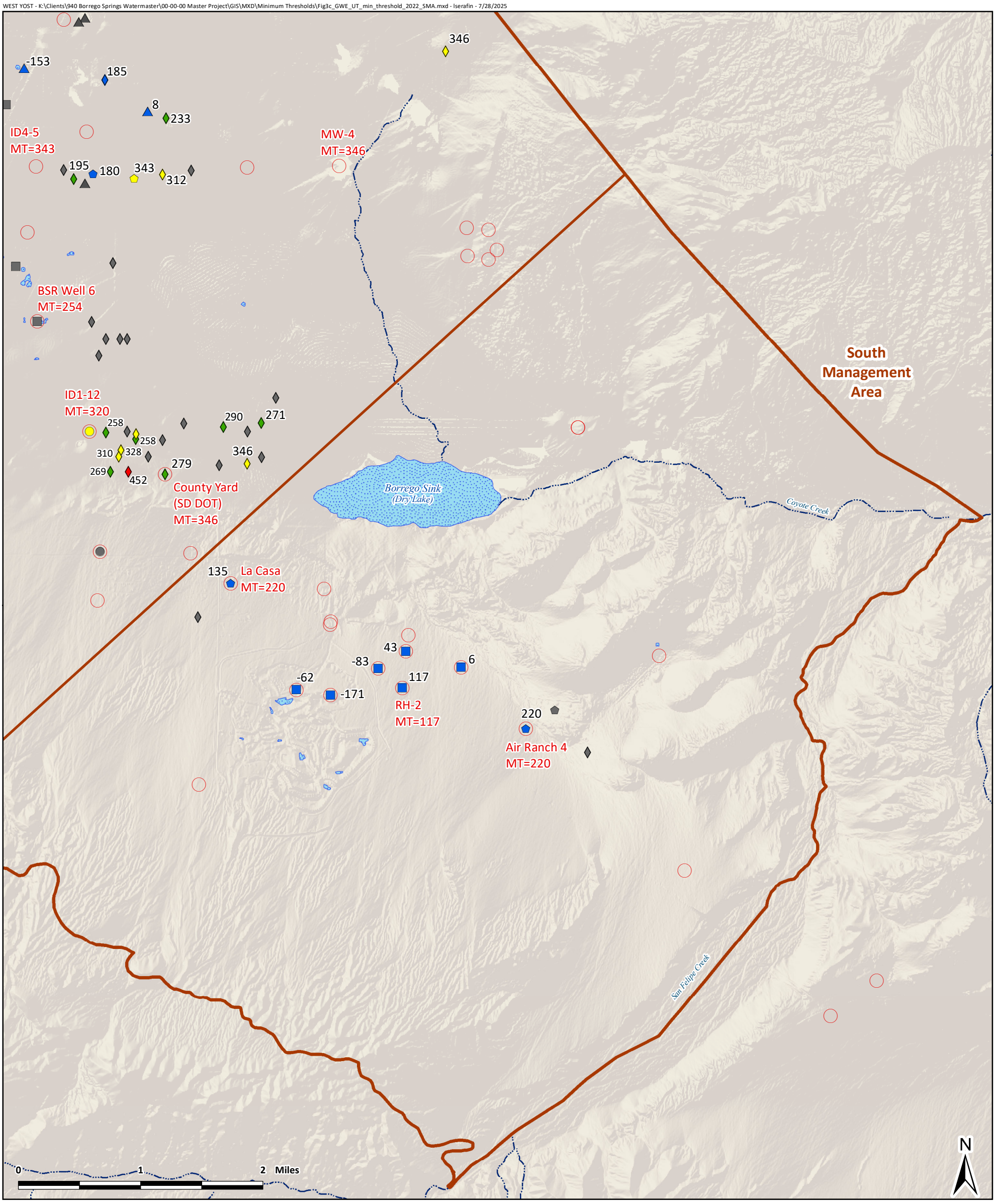


Water Level Above/Below the Groundwater-Elevation Use Threshold (2022)

- -50 - 0 ft
- 0 - 50 ft
- 50 - 100 ft
- 100 - 200 ft
- > 200 ft
- No well construction data

Well Use *(labeled by Groundwater-Elevation Use Threshold)*

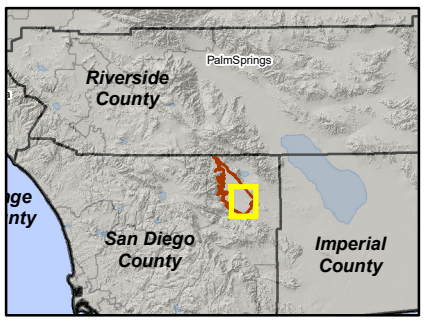
- 100 △ Agriculture
- ⬠ Other
- ○ Municipal
- □ Recreation
- ◊ De Minimis (unknown well status)

Proposed Minimum Thresholds at Proposed Representative Monitoring Wells

MT=100 ○ Groundwater-Level Monitoring Network

Other features

Borrego Springs Subbasin with Management Area Divisions



Borrego Springs Watermaster

Groundwater Monitoring Plan

Figure 3c

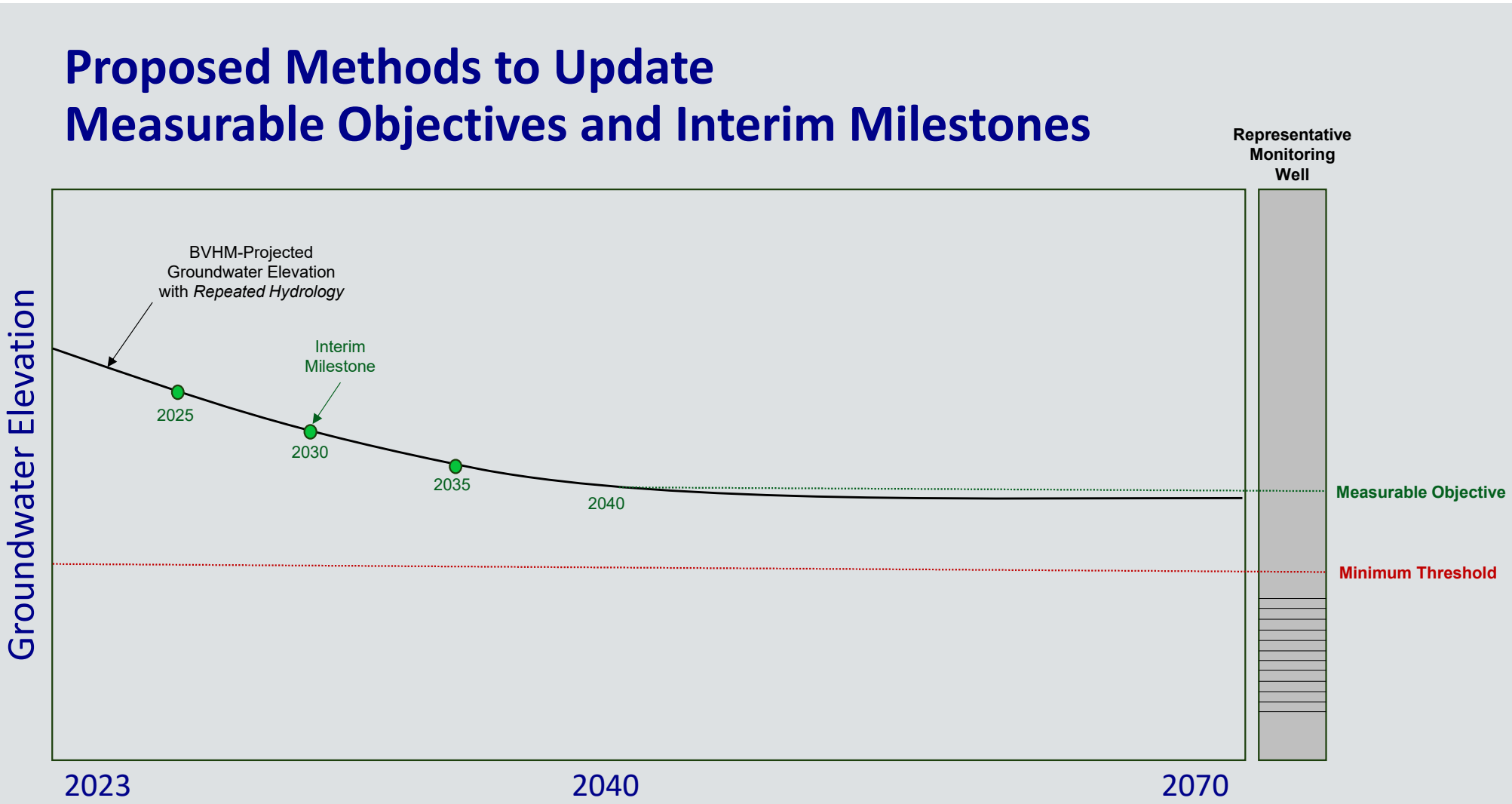
Groundwater-Elevation Use Thresholds for Active Pumping Wells and Proposed Minimum Thresholds

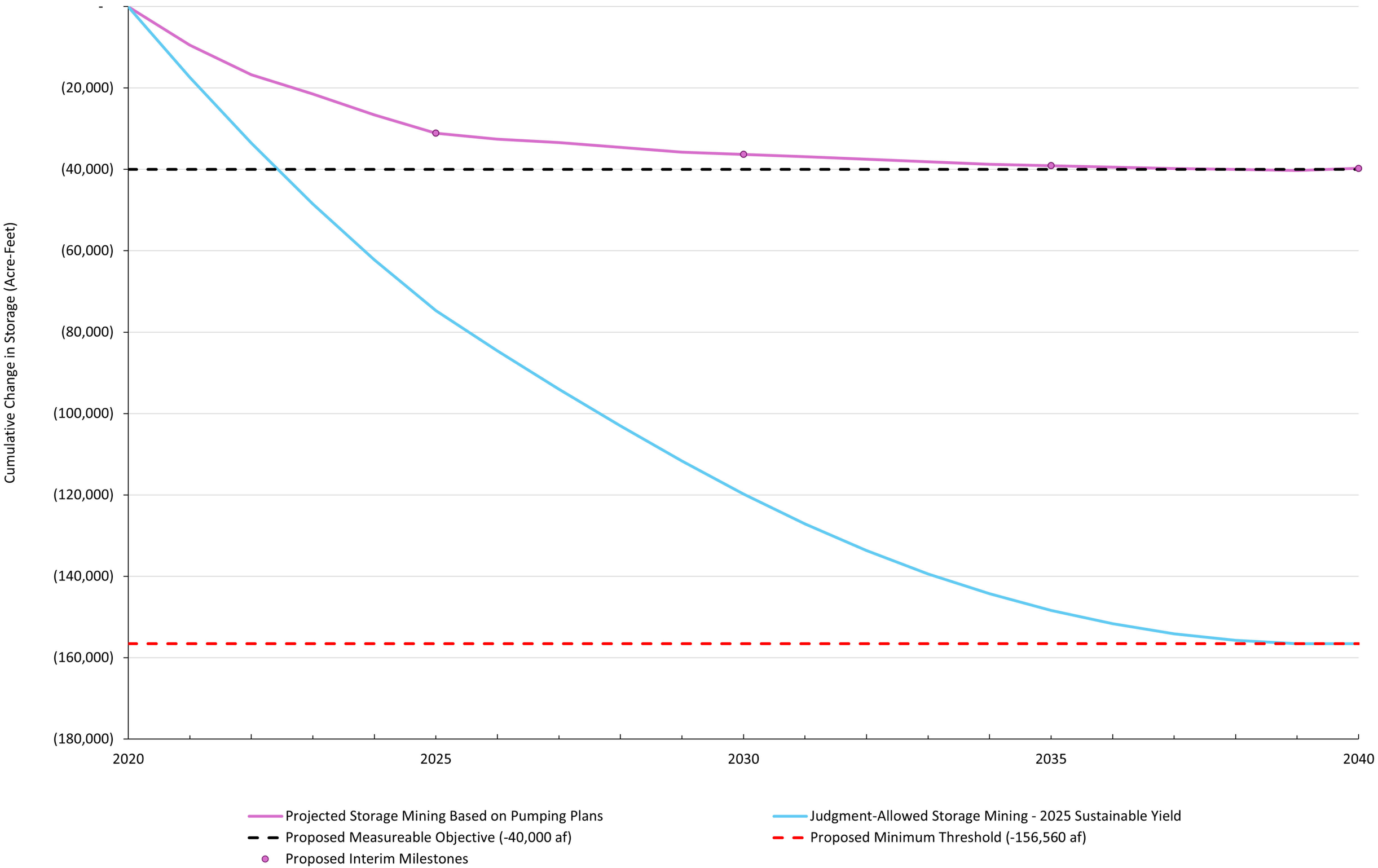
South Management Area

Prepared by:

WEST YOST

FIGURE 4


Proposed Methods to Update
Measurable Objectives and Interim Milestones
Representative
Monitoring
Well
BVHM-Projected
Groundwater Elevation
with *Repeated Hydrology*
Interim
Milestone
2025
2030
2035
2040
Groundwater Elevation
Measurable Objective
Minimum Threshold
2023
2040
2070


Cumulative Change in Storage (Acre-Feet)
-
(20,000)
(40,000)
(60,000)
(80,000)
(100,000)
(120,000)
(140,000)
(160,000)
(180,000)
2020
2025
2030
2035
2040
Projected Storage Mining Based on Pumping Plans
Judgment-Allowed Storage Mining - 2025 Sustainable Yield
Proposed Measureable Objective (-40,000 af)
Proposed Minimum Threshold (-156,560 af)
Proposed Interim Milestones

Borrego Springs Watermaster
Technical Advisory Committee Meeting
August 7, 2025
AGENDA ITEM V

To: Technical Advisory Committee (TAC)

From: Andy Malone, PG (West Yost), Technical Consultant

Date: August 1, 2025

Subject: Review of the UCI GDE Study Report as "Best Available Science"

Background and Objectives

The Borrego Springs Watermaster's current Groundwater Management Plan (GMP) states that the rooting depths of the Mesquite Bosque in the Borrego Sink area became largely disconnected from the regional aquifer of the Borrego Springs Subbasin (Basin) by about 1985 because of the long-term declines in groundwater levels that occurred across the Basin since the 1940s. Therefore, the Mesquite Bosque was not considered a groundwater dependent ecosystem (GDE) in the GMP.

A study of the Mesquite Bosque was recently conducted by the University of California Irvine (UCI) to generate more information on the groundwater dependency of the Mesquite Bosque, which has been documented in a report (UCI GDE Study Report). The final UCI GDE Study Report is complete and available for download here.

The GDE Study Report is considered "new information" which could potentially be used by the Watermaster in two main ways:

1. *Updates to the Borrego Valley Hydrologic Model* (BVHM). The BVHM simulates evapotranspiration (ET) of groundwater using the Farm Process (FMP). The historical BVHM estimates of groundwater ET are part of the water budget of the Basin and were used to calculate the 2025 Sustainable Yield. The UCI GDE Study Report could be used to update the FMP to improve its ability to simulate groundwater ET by the Mesquite Bosque, and hence, improve the BVHM for its use in the 2030 Redetermination of the Sustainable Yield.

2. *Future updates to the GMP*. The GDE Study Report could be used to update the GMP regarding the Mesquite Bosque as a GDE and an environmental user of Basin groundwater.

While the UCI GDE Study Report may provide useful new information, the Watermaster has not yet formally reviewed the GDE Study Report, and hence, has not yet determined that the UCI GDE Study Report constitutes "best available science" that can be relied upon by the Watermaster to take action or make policy decisions.

In May 2024, the Watermaster approved a policy regarding the use of "best available science."[1] This policy permits the use of technical information not generated by the Watermaster to inform its policy decisions; however, the Watermaster shall not rely on or use such technical information to take action or make policy decisions without an independent review and recommendation from the Technical Advisory Committee (TAC), the Environmental Working Group (EWG), and/or Watermaster Technical Consultant (TC). The Watermaster Board is also considering the hire of an environmental consultant to perform an independent technical peer review of the UCI GDE Study Report.

Given this background, the Board is requesting TAC input and effort on the following three items:

Candidates for Independent Peer Reviewer

The Board has requested a list of qualified candidates for a consultant to perform an independent technical peer review of the UCI GDE Study Report. Qualifications should include expertise in the fields of desert ecology, Mesquite trees, groundwater dependent ecosystems, and hydrogeology. West Yost has identified one potential candidate and has queried members of the TAC and EWG for recommendations of additional candidates and qualifications to share with the Board at its August 20, 2025 meeting.

To date, West Yost and some TAC members have submitted the following recommended candidates:

1. Desert Research Institute
2. University of Arizona, Desert Southwest Cooperative Ecosystem Studies Unit (DSCESU)
3. Pamela Nagler, Ph.D. from the United States Geological Survey office in Arizona

At the meeting, the TAC will discuss these and other candidates and potentially develop a recommendation for the Board.

Scope of Work, Deliverable, and Schedule for Review of GDE Study Report

The Board is considering the appropriate scope-of-work, deliverables, and schedule to perform the independent review of the UCI GDE Study Report, including the participation of the TAC/EWG/TC. At the meeting, the TAC will discuss the appropriate scope-of-work, deliverables, and schedule (listed below) and potentially develop a recommendation for the Board:

Scope for Peer Review

1. TAC/EWG/TC review GDS Study Report and prepare comments
2. Provide peer reviewer with GDS Study Report and TAC/EWG/TC comments
3. Peer reviewer reviews GDE Study Report and TAC/EWG/TC comments and prepares a draft report
4. Peer reviewer meets with TAC/EWG to present report findings
5. TAC/EWG prepare comments on draft report

[1] Available on the Watermaster's website at: https://borregospringswatermaster.com/wp-content/uploads/2025/02/BSWM-Policy-on-Use-of-Best-Available-Science_final.pdf

6. Peer reviewer meets with Board to present report findings and TAC/EWG comments
7. Board submits comments on draft report
8. Peer reviewer prepares final report for Board consideration

Peer Review Deliverable

The peer reviewer will prepare a recommendation report to the Board that responds to the following questions based on its independent review of the GDE Study Report and all comments received from the TAC/EWG/TC:

- Does the GDE Study Report unequivocally prove that the Mesquite Bosque is currently dependent upon groundwater from the regional aquifer system? If not, what additional information in necessary to make this conclusion?
- Does the GDE Study Report sufficiently consider and analyze other sources of water that could be sustaining the Mesquite Bosque (e.g., precipitation, surface-water runoff, shallow "perched" groundwater, etc.)?
- Do you agree or disagree with the recommendations in the GDE Study Report? Explain.
- In consideration of these questions, does the GDE Study Report constitute "best available science" that can be relied upon by the Watermaster to take action or make policy decisions?
    - How can/should the Watermaster use the results of the GDE Study Report? For example, can the report be used to update the BVHM? If so, how?
    - Are there ways that the GDE Study Report *should not* be used by the Watermaster?

Schedule for Peer Review

July 2025:

- Email to TAC/EWG requesting:
    - A list of candidates for an independent peer reviewer
    - Review the proposed scope of work and deliverable for the independent peer review
- EWG/TAC provides responses to TC by email on or before July 31

August 2025:

- TAC meeting (August 7):
    - Discuss scope and potential peer-review candidates
    - Assign TAC to review and comment on GDE Study Report
- Board meeting:
    - Review the proposed scope of work and deliverable for peer reviewer

    - Review list of peer review candidates
    - Select candidates to request proposals
- Staff solicits proposals for peer reviewer
- EWG meeting:
    - Update on status
    - Assign EWG to review and comment on GDE Study Report

September 2025:

- Receive proposals and send to TAC/EWG for review
- Joint TAC/EWG meeting to recommend peer reviewer

October 2025:

- TAC/EWG/TC to submit comments on GDE Study Report
- Board meeting:
    - Select peer reviewer
- Send notice to proceed and TAC/EWG/TC comments to peer reviewer

February 2026:

- Joint TAC/EWG meeting to receive draft report and presentation from peer reviewer
- TAC/EWG prepare comments on draft report

March 2026:

- Peer reviewer meets with Board to present report findings and TAC/EWG comments
- Board submits comments on draft report

April 2026:

- Board meeting:
    - Peer reviewer presents final report for Board consideration
    - Board directs staff on recommended actions to scope next steps

May 2026:

- Board meeting:
    - Staff presents scope of work and cost estimate for next steps

June 2026:

- Board meeting:
    - Board approves scope and budget for next steps in WY 2026 and 2027

July 2026 and thereafter:

- Staff proceed with next steps

TAC Review and Comment on the UCI GDE Study Report

Pursuant to the proposed scope-of-work and schedule described above, it is likely the Board will request TAC review and comment on the report prior to the October 2025 Board meeting; however, ***the Board has not yet formally made this request***. The Board will likely vote on this request at its August 20, 2025 meeting.

That said, the final UCI GDE Study Report is complete and available for download here.