

Water Year 2025 Annual Report for the Borrego Springs Subbasin

PREPARED FOR

Borrego Springs Watermaster

PREPARED BY



Water Year 2025 Annual Report for the Borrego Springs Subbasin

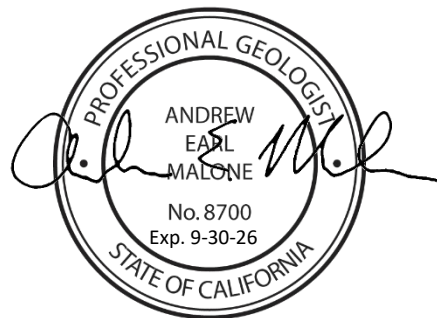
Prepared for

Borrego Springs Watermaster


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March 31st, 2026
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LIST OF ACRONYMS AND ABBREVIATIONS

\$/af	Dollars Per Acre-Foot
µg/L	Micrograms Per Liter
AAWARE	Agricultural Alliance for Water and Resource Education
ABDSP	Anza-Borrego Desert State Park
AEM	Airborne Electromagnetic survey
af	Acre-Feet
afy	Acre-Feet Per Year
AMI	Advanced Metering Infrastructure
Annual Report	Annual Report for the Borrego Springs Subbasin
Basin	Borrego Springs Subbasin
BPA	Baseline Pumping Allocation
BSUSD	Borrego Springs Unified School District
BVHM	Borrego Valley Hydrologic Model
BWD	Borrego Water District
CA	California
CCP	Code of Civil Procedure
CCR	California Code of Regulations
CDFM	Cumulative Departure form Mean Precipitation
CEQA	California Environmental Quality Act
cfs	Cubic Feet Per Second
CIMIS	California Irrigation Management Information System
CMA	Central Management Area
COC	Constituent of Concern
County	County of San Diego
CWC	California Water Code
DWR	California Department of Water Resources

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ET	Evapotranspiration
ET _o	Reference Evapotranspiration
EWG	Environmental Working Group
FMP	Farm Process Package
ft/yr	Feet Per Year
ft-amsl	Feet Above Mean Sea Level
GDE	Groundwater Dependent Ecosystem
GIS	Geographic Information System
GMP	Groundwater Management Plan for the Borrego Springs Groundwater Subbasin
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GWMP	Groundwater Monitoring Plan
Judgment	Stipulated Judgment
MCL	Maximum Contaminant Level
mg/L	Milligrams Per Liter
NMA	North Management Area
NOAA	National Oceanic and Atmospheric Administration
PMA	Project and Management Actions
QA/QC	Quality Assurance and Quality Control
RCA	Recommended Corrective Action
RFP	Request for Proposal
RWG Law	Richards Watson Gershon Law
SGM	Sustainable Groundwater Management
SGMA	Sustainable Groundwater Management Act
SMA	South Management Area
TAC	Technical Advisory Committee
TDS	Total Dissolved Solids
TM	Technical Memorandum
TSS	Technical Support Services
UCI	University of California Irvine
USGS	United States Geological Survey
Watermaster	Borrego Springs Watermaster
WQMP	Groundwater Quality Monitoring Plan
WY	Water Year

Annual Report for the Borrego Springs Subbasin Water Year 2025

EXECUTIVE SUMMARY

This *Annual Report for the Borrego Springs Subbasin* (Annual Report) was prepared by the Borrego Springs Watermaster (Watermaster) for the Water Year (WY) 2025 reporting period of October 1, 2024 through September 30, 2025. The Annual Report satisfies the reporting requirements of (1) the Stipulated Judgment (Judgment) that adjudicated the groundwater rights of the Borrego Springs Subbasin (Basin) and (2) the Sustainable Groundwater Management Act (SGMA).¹ This is the fifth Annual Report of the Watermaster to satisfy these combined reporting requirements.

On April 8, 2021, the honorable Judge Peter Wilson of the California (CA) Superior Court for the County of Orange granted the motion for entry of the Judgment. As stated in Section II.F of the [Judgment](#)², the Court found that the Physical Solution for the Basin, which is comprised of the Judgment and *Groundwater Management Plan for the Borrego Springs Subbasin* (GMP)³, is consistent with California Water Code (CWC) §10737.8 and is a prudent, legal, and durable means to achieve sustainable groundwater management within the Basin as intended by SGMA. The entry of the Judgment represents a key milestone for the Basin in achieving sustainability by 2040, as required by SGMA.

On February 25, 2025, the CA Department of Water Resources (DWR) issued a determination letter approving the Watermaster's submission of the Judgment and GMP as an "Alternative" to a SGMA Groundwater Sustainability Plan (GSP). In its report, DWR reported that Borrego Springs stood out from the other critically-over drafted basins in three specific ways: "*few, if any, other critically-over drafted basins subject to SGMA have achieved equivalent levels of implementing the following measures: (1) metering and reporting of over 95 percent of groundwater extractions; (2) well-defined and enforceable pumping allocations and extraction fees; and (3) actual, substantial reductions in extractions.*" The DWR's determination letter also included seven recommended corrective actions (RCAs) to improve the Alternative Plan.

Since entry of the Judgment in January 2020, the Watermaster has achieved the following key milestones:

- Implemented a comprehensive metering program to track pumping by all non-de minimis pumpers, including:
 - Achieved 99 percent compliance with the meter reading program as of the end of WY 2024, with only one well that remains unmetered.
 - Implemented a monthly meter reading program to assess seasonal pumping trends.
 - Improved understanding of pumping in the Basin such that 99 percent of the total pumping reported for WY 2025 is based on meter read data.
- Achieved pumping reductions in excess of the Rampdown Rate required by the Judgment. The pumping data show that:

¹ Judgment Section IV.E(5); CWC Section (§) 10728.

² https://borregospringswatermaster.com/wp-content/uploads/2021/06/stipulated-judgment-04-08-2021_bookmarked.pdf

³ The current version of the GMP is referred to herein as the 2020 GMP. The Watermaster is currently working on a GMP update as part of the 5-Year Assessment required by SGMA. The update, once completed and published, will be the 2026 GMP.

- Groundwater pumping has decreased by 29 percent since the start of GMP implementation in WY 2021 (when metered pumping data is available), from 14,365 af in WY 2021 to 10,155 af in WY 2025.
- The WY 2025 Annual Allocation of 18,270 acre-feet (af) represents a 25 percent Rampdown from the Baseline Pumping Allocation (BPA). The total pumping by all Parties in WY 2025 was 10,129 af, which is about 45 percent less than the allowed Annual Allocation. Thus, reductions in pumping are significantly ahead of the required Rampdown Rate.
- Achieved a reduced rate of groundwater storage decline during GMP implementation. The average annual groundwater storage losses have decreased from approximately 7,960 acre-feet per year (afy) prior to GMP implementation (WY 1945 through 2020) to approximately 3,460 afy (WY 2021 through 2025), consistent with reduced pumping under the GMP and Rampdown. In WY 2025, the change in storage was approximately 1,826 afy, which is less than the average rate of decline since the start of GMP implementation.
- Performed detailed water rights accounting, by Party, for each WY since WY 2021 to document the full accounting of BPA rights, Annual Allocation, transfers of water rights, pumping, and Carryover (elections, pumping, and balances). This accounting has helped to demonstrate that features of the Judgment, such as Carryover, are being implemented as intended; and it creates transparency for the Court, Parties, and interested stakeholders.
- Significantly expanded the Groundwater Monitoring Program to achieve Basin-wide coverage for groundwater level and quality monitoring and adherence to SGMA requirements. Through implementation of the 2023 Groundwater Monitoring Program, and with funding support from the Proposition 64 Sustainable Groundwater Management (SGM) grant program, 21 wells were added to the monitoring network since WY 2023.

This Annual Report is organized into six sections detailing relevant background information and activities in WY 2025. The sections are summarized below, along with certain key findings.

Section 1 – Introduction. This section provides background information on the Basin, Physical Solution, the Watermaster’s powers and responsibilities, and how this report complies with the reporting requirements of the Judgment and SGMA.

Section 2 – Watermaster Administrative Activities. This section describes the Watermaster’s administrative activities for the reporting period, including an overview of the Watermaster Board and Staff, meetings and Board actions, rules and regulations, Judgment amendments, and financial management (budget, audit, and grant funding).

Section 3 – Watermaster Technical Activities. This section describes the Watermaster’s technical activities during the reporting period, including monitoring of groundwater pumping, groundwater levels, and groundwater quality, data management, the activities of the Technical Advisory Committee (TAC) and the Environmental Working Group (EWG), and stakeholder engagement to share technical information. Key activities during the reporting period included:

- Approved the 2025 Sustainable Yield, the first five-year update since entry of the Judgment. The redetermination of the 2025 Sustainable Yield followed a comprehensive extension, update, and recalibration of the Borrego Valley Hydrologic Model (BVHM), which

- incorporated new metered pumping data and groundwater level measurements and refined the estimate of the Basin’s water budget used to calculate the Sustainable Yield.
- Performed the first review of Carryover rules in the Judgment and set a new deadline to re-evaluate Carryover by January 1, 2030.
 - Completed the Biological Restoration of Fallowed Lands study, utilizing DWR grant funding.
 - Watermaster continued to add new wells to its Groundwater Monitoring Program to expand the groundwater-level and groundwater-quality monitoring networks in the north and central management areas (NMA, CMA). Of the wells added in WY 2025:
 - 1 private well was added to the groundwater-quality monitoring program.
 - 5 inactive wells were added to the groundwater-level monitoring program following maintenance activities to properly secure and convert the well for monitoring purposes.
 - 5 existing monitoring wells at the Borrego Landfill were added to both the groundwater-level and groundwater-quality monitoring programs. Historical data for these wells was added to the Watermaster’s data management system.
 - Watermaster performed well rehabilitation and/or securing activities at ten inactive wells in the existing monitoring program that needed to be properly secured due to public safety concerns. This work also extended the lifespan of the monitoring wells.

Section 4 – WY 2025 Water Rights Accounting.⁴ This section summarizes the Watermaster’s Water Rights Accounting for WY 2025. The water rights accounting is performed for each Party to the Judgment, including Parties with BPA rights and Parties with other non-De Minimis rights that are not based on BPA, specifically the Anza Borrego Desert State Park (ABDSP) and the Borrego Springs Unified School District (BSUSD). This section defines the water rights terminology, and it summarizes (by Party and in the aggregate) water rights, allowable and actual pumping, transfers and leases of BPA and Carryover, the amount of Carryover held, and the Adjusted Pumping Calculation for establishing the WY 2026 Pumping Assessment. In WY 2025:

- The total pumping by all Parties in WY 2025 was 10,128.95 af.
 - Total pumping by BPA Parties was 10,100.77 af
 - Total pumping by ABDSP and BSUSD was 28.18 af
- Parties with BPA elected to Carryover a total of 8,635.97 af of the available unpumped Annual Allocation to WY 2026 (63 percent of eligible Carryover).
- The Adjusted Pumping Calculation for establishing the Pumping Assessment Rate for WY 2026 was 10,505.66 af.
- The uniform Pumping Assessment Rate for WY 2026, based on the Adjusted Pumping Calculation and WY 2026 Pumping Assessment of \$350,000, is \$33.32 per af of Adjusted Pumping in WY 2025. This is a 38 percent increase in the Pumping Assessment rate relative to the prior year.

⁴ The Water Rights Accounting does not quantify or account for pumping by De Minimis pumps.

Section 5 – Borrego Springs Subbasin Hydrologic Conditions. This section describes the current Basin conditions as of WY 2025, including climate, surface water, water use, groundwater levels, change in groundwater storage, and groundwater quality. The data and analysis in this section satisfy the reporting requirements of SGMA. The data shows that:

- Precipitation in WY 2025 was 3.54 inches, which is 1.96 inches less than the mean for the period of record. Based on the standard deviation from the mean, WY 2025 was a “normal” year. Based on the cumulative departure from mean (CDFM) precipitation, the region has been experiencing a nearly 30-year dry period since 1993, punctuated by a few wet years.
- The rate of decline in groundwater levels (e.g., feet per year [ft/yr] of decline) since GMP implementation is less than the historical rate of decline at all but one well.
- The rate of change in groundwater storage has declined over time:
 - The change in groundwater storage over WY 2025, from fall 2024 to fall 2025 was approximately -1,826 af (decrease of groundwater in storage).
 - The cumulative change in groundwater storage prior to GMP implementation (WY 1945 through 2019) was about -596,768 af, a decrease of about -7,957afy.
 - The cumulative change in groundwater storage since the passage of SGMA (WY 2015 through 2025) was about -73,530 af, a decrease of about -7,353 afy.
 - The cumulative change in groundwater storage since GMP implementation (WY 2020 through 2025) was approximately -17,283 af, a decrease of about -3,457 afy. The cumulative storage change is significantly less than the Minimum Threshold defined in the 2020 GMP. In addition, the rate of storage change is decreasing since GMP implementation began.

Section 6 – Summary of Physical Solution Implementation Progress. This section summarizes the key milestones accomplished since the formation of the Watermaster in March 2020 through the end of the reporting period.

As required by the Section IV.E.5 of the Judgment, Watermaster notified the Parties and interested stakeholders that this draft Annual Report is available for review and held a public hearing to receive comments during Watermaster’s regular Board meeting on February 18, 2026 (virtual meeting). Additionally, the Watermaster accepted written comments on the draft Annual Report through February 23, 2026. The final report reflects the changes made based on the comments received. Appendix I of this Annual Report provides a summary documentation of the response to comments and copies of the comments received.

1.0 INTRODUCTION AND BACKGROUND

This *Annual Report for the Borrego Springs Subbasin* (Annual Report) was prepared by the Borrego Springs Watermaster (Watermaster) to satisfy reporting requirements of (1) the Stipulated Judgment⁵ (Judgment) that adjudicated the groundwater rights of the Borrego Springs Subbasin (Basin) and (2) the Sustainable Groundwater Management Act (SGMA).⁶ Figure 1 is a location map of the Basin and surrounding region. This Annual Report is intended to provide the Court with a comprehensive overview of the Watermaster’s activities during Water Year (WY) 2025: October 1, 2024 through September 30, 2025.

1.1 Purpose and Report Organization

Pursuant to Section IV.E.5 of the Judgment, the Watermaster is required to prepare and file an Annual Report with the Court not later than April 1 following the end of each WY.⁷ Watermaster is also required to file an Annual Report with the CA Department of Water Resources (DWR) pursuant to the requirements of SGMA, specifically Article 7, Section 356.2—Annual Reports, of the California Code of Regulations (CCR). The regulations require that an annual report be submitted to the DWR by April 1 of each year following the adoption of a Groundwater Sustainability Plan (GSP) or Alternative Plan.

This is the fifth Annual Report of the Watermaster to satisfy these combined reporting requirements. Four prior Annual Reports were prepared and submitted to the DWR to satisfy both the Judgment and SGMA requirements (West Yost, 2022a; West Yost, 2023; West Yost, 2024; West Yost, 2025). Prior to entry of the Judgment, two Annual Reports were prepared and submitted to the DWR to satisfy the SGMA requirements only (Dudek, 2020b; West Yost, 2021). All Annual Reports are available on the Watermaster’s website at: <https://borregospringswatermaster.com/documents>.

This report is organized into the following sections:

- **Section 1 – Introduction.** This section provides background information on the Basin, Judgment, Physical Solution, Watermaster, and SGMA compliance.
- **Section 2 – Watermaster Administrative Activities.** This section describes the Watermaster’s administrative activities for WY 2025.
- **Section 3 – Watermaster Technical Activities.** This section describes the Watermaster’s technical activities, including those of the Technical Advisory Committee (TAC) and the Environmental Working Group (EWG), for WY 2025.
- **Section 4 – WY 2025 Water Rights Accounting.** This section summarizes the Watermaster’s Water Rights Accounting for WY 2025 including: a description of the Baseline Pumping Allocation (BPA) and other non-De Minimis water rights allocated by the Judgment; reporting of aggregate pumping Parties, a record of leases and transfers of BPA and Carryover water, the amount of Carryover water held by each Party with BPA, and the Adjusted Pumping Calculation for establishing the WY 2026 Pumping Assessment to fund Watermaster operations.

⁵ Judgment Section IV.E.5.

⁶ CWC Section (§) 10728.

⁷ A motion to amend the Judgment to extend the Annual Report filing deadline to April 1st was filed with the Superior Court of Orange County on January 13, 2023 and was approved at an April 20, 2023 hearing.

- **Section 5 – Borrego Springs Subbasin Hydrologic Conditions.** This section describes the current Basin conditions as of WY 2025, including climate, surface water, water use, groundwater levels, groundwater quality, and change in groundwater storage.
- **Section 6 – Summary of Physical Solution Implementation Progress.** This section summarizes the key milestones accomplished by the Watermaster in implementing the Judgment as of WY 2025.



Borrego Valley Groundwater Basin Subbasins

- Borrego Springs Groundwater Subbasin (7-024.01)
- Ocotillo Wells Groundwater Subbasin (7-024.02)

Surface Water Features

- Stream Channel
- Dry Lake

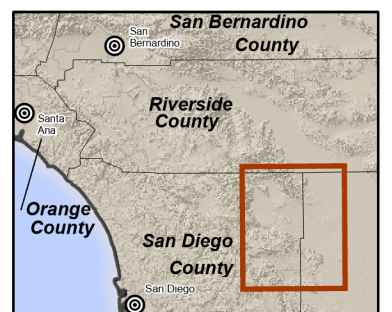


Figure 1

Borrego Springs Subbasin Location Map

Prepared by:



1.2 Background and Regulatory Setting

The Basin is designated by the DWR as a critically overdrafted basin and a high priority for the development of a GSP in accordance with SGMA (California Water Code [CWC]§ 10720-10737.8, et al). In October 2016, the County of San Diego (County) and the Borrego Water District (BWD), formed the Groundwater Sustainability Agency (GSA) for the Borrego Valley, to address the requirement to prepare a GSP. In August 2019, the County and BWD completed a draft final GSP⁸ in accordance with the DWR’s GSP Regulations defined in the CCR Title 23, Section 350 et seq. In accordance with a Settlement Agreement amongst Basin pumpers that were responsible for over 90 percent of groundwater pumping in the Basin (Settling Parties), the GSP was subsequently modified and repurposed as the *Groundwater Management Plan for the Borrego Springs Subbasin* (GMP) to serve as an integral part of a “Physical Solution” in a groundwater rights adjudication of the Basin. In anticipation of the adjudication action, the County withdrew from the Borrego Valley GSA effective December 31, 2019; the Settlement Agreement was executed on January 29, 2020 and on January 31, 2020 the Borrego Valley GSA ceased performing groundwater management actions.

In January 2020, as provided for by the Settlement Agreement, the BWD filed a complaint in the California (CA) Superior Court for Orange County seeking to enter a stipulated judgment within a comprehensive adjudication for the Basin, pursuant to Code of Civil Procedure (CCP) sections 830, et seq (Borrego Water District v. All Persons Who Claim a Right to Extract Groundwater in the Borrego Valley Groundwater Subbasin, et al., San Diego Superior Court Case no. 37--2020--00005776--CU-TT-CTL). The proposed Judgment was filed with the Court pursuant to the Settlement Agreement. Additionally in January 2020, on behalf of the Settling Parties, the BWD submitted the proposed Judgment and GMP to the DWR as an “Alternative” to a GSP, in accordance with CWC § [10733.6 \(b\)](#).

The Settlement Agreement also provided for the establishment of an Interim Borrego Springs Watermaster to assume all responsibility for sustainable management of the Basin pursuant to the terms of the proposed Judgment until finalized by the Court. The Interim Borrego Springs Watermaster held its first meeting on March 31, 2020. About a year later, on April 8, 2021, the honorable Judge Peter Wilson of the CA Superior Court for the County of Orange granted the motion for entry of the [Judgment](#).⁹ As stated in Section II.F of the Judgment, the Court found that the Physical Solution for the Basin, which is comprised of the Judgment and GMP¹⁰, is consistent with CWC §10737.8 and is a prudent, legal, and durable means to achieve sustainable groundwater management within the Basin as intended by SGMA. The entry of the Judgment represents the most important milestone for the Basin in achieving sustainability by 2040, as is required by SGMA for all critically overdrafted basins.

The Watermaster held its first official meeting as a Court-appointed entity on April 8, 2021. In accordance with the terms of the Settlement Agreement, the BWD withdrew as the Borrego Valley GSA on June 16, 2021 and informed DWR to direct all SGMA compliance matters to the Watermaster as the primary point of contact (BWD, 2021). This action formally dissolved the Borrego Valley GSA.

As part of the [Judgment Findings and Order](#)¹¹, the Court ordered the submittal of the final approved Judgment to DWR for evaluation and assessment. On June 15, 2021, pursuant to the Court order, the

⁸ Information regarding the GSP, including its stakeholder process, is available from the [County’s website](#).

⁹ https://borregospringswatermaster.com/wp-content/uploads/2021/06/stipulated-judgment-04-08-2021_bookmarked.pdf

¹⁰ The GMP is included in the Judgment as Exhibit 1.

¹¹ <https://borregospringswatermaster.com/wp-content/uploads/2021/04/2021-04-08-judgment-findings-and-order.pdf>

Watermaster re-submitted a complete GSP Alternative submission package to the DWR documenting the Judgment's Physical Solution (including the GMP) as its Alternative to a GSP. The submission package is available for review on the [DWR's SGMA Portal](#).¹² On February 25, 2025, the DWR submitted a letter to the Watermaster approving the Alternative Plan, detailing its assessment of the Judgment and GMP, and providing seven recommended corrective actions (RCAs). In its report, DWR reported that Borrego Springs stood out from the other critically-over drafted basins in three specific ways: "few, if any, other critically overdrafted basins subject to SGMA have achieved equivalent levels of implementing the following measures: (1) metering and reporting of over 95 percent of groundwater extractions; (2) well-defined and enforceable pumping allocations and extraction fees; and (3) *actual, substantial reductions in extractions.*" The seven RCAs are being addressed as part of the 5-Year Assessment of the GMP (5-Year Assessment) that will be delivered to DWR in June 2026.

In this report, all references to the GMP are to the original 2020 GMP. The Watermaster is currently working on a GMP update as part of the 5-Year Assessment required by SGMA. The update, once completed and published, will be the 2026 GMP, which constitutes the first formal update to the 2020 GMP.

1.3 Physical Solution

The Judgment, together with the GMP¹³, constitutes the Physical Solution for the Basin to achieve sustainable groundwater management. It serves as the technical approach for Basin management to achieve sustainability and is intended to provide flexibility and adaptability to allow the Court to use existing and future technological, social, institutional, and economic options to maximize reasonable and beneficial water use in the Basin (Judgment Section III.C).

1.3.1 Stipulated Judgment

The Judgment comprehensively determined and adjudicated all groundwater rights in the Basin, whether based on appropriation, overlying right, prescriptive right, or other basis of right. It provides a Physical Solution for the perpetual management of the Basin, consistent with the objectives of SGMA and with reasonable and beneficial use under Article X, Section 2 of the California Constitution. To maintain a viable water supply for current and future beneficial uses and users of groundwater in the Basin, the sustainability goal of the Physical Solution is to ensure that by 2040, and thereafter within the planning and implementation horizon of the GMP (50 years), the Basin is operated within its Sustainable Yield and does not exhibit Undesirable Results as defined by CWC § 10721(x). Some of the key provisions of the Judgment are highlighted below.¹⁴

Establishment of Pumping Rights.¹⁵ Section III.A of the Judgment established a baseline water right known as BPA for each Party with BPA rights. The BPA is defined as the maximum allowed pumping quantity allocated to a Party to the Judgment (Judgment Section I.A.8) and each Party's BPA is listed in Exhibit 4 of the Judgment. Exhibit 4 is updated annually with any changes to BPA allocation based on Permanent Transfers of rights (see Section 4 and Appendix E). The total BPA is 24,293 acre-feet (af).

¹² <https://sgma.water.ca.gov/portal/alternative/print/39>

¹³ The GMP is included as Exhibit 1 to the Judgment.

¹⁴ This is not intended to be a complete list of provisions or rules of operation pursuant to the Judgment.

¹⁵ See Judgment Sections I.A.8, II.G, III.A, III.D, and III.H

Starting in WY 2021, the annual pumping rights of each Party, referred to as the “Annual Allocation”, are limited to a percentage of the Party’s BPA such that by 2040 the total Annual Allocation is equal to the then-current Sustainable Yield of the Basin.

The Judgment also establishes separate pumping rights for two entities—the Anza-Borrego Desert State Park (ABDSP) and the Borrego Springs Unified School District (BSUSD). These pumping rights are not BPA rights and are not subject to pumping Rampdown or Carryover provisions (see description of these provisions below) but are subject to all other substantive provisions of the Judgment, including the requirements to meter pumping and pay pumping assessments. The combined pumping rights of these two parties is 42 af per year (afy).

The Judgment also regulates existing De Minimis pumping by any person or entity owning real property overlying the Basin, but initially finds that De Minimis pumping will not likely significantly contribute to Undesirable Results in the Basin. The BPA does not include the pumping rights of existing De Minimis Pumpers who produce two afy or less. De Minimis pumping rights are not eligible to be transferred to another real property owned by another person. Any person or entity that seeks to initiate De Minimis pumping following entry of the Judgment must submit an [application](#)¹⁶ to the Watermaster and the Watermaster will determine if the proposed De Minimis pumping will contribute to or threaten to contribute to Undesirable Results or other interests related to the Basin. The application shall be denied if the Watermaster Board finds that the new De Minimis pumping will contribute to or threaten to contribute to Undesirable Results or other interests related to the Basin. To the extent that the Court determines that De Minimis pumping (existing and/or new) has significantly contributed to or threatens to significantly contribute to Undesirable Results, the Court may regulate De Minimis pumping as deemed prudent (Judgment Section III.H).

Determination of Sustainable Yield.¹⁷ Sustainable Yield is defined as the maximum quantity of water that can be cumulatively pumped on an annual basis from the Basin without causing an undesirable result, consistent with SGMA (CWC § 10721(w)). The Sustainable Yield is estimated using a water-balance approach in which natural outflows are subtracted from natural inflows over a base period representative of long-term conditions in the Basin. Estimates are developed using the best available records and data, sound scientific and engineering methods, input from the Watermaster’s Technical Consultant and its TAC, and are supported by groundwater modeling results from the Borrego Valley Hydrologic Model (BVHM).

The Initial Sustainable Yield of the Basin was set at 5,700 afy for the first five-year period of implementation (WY 2021 through WY 2025), as specified in the Judgment. The Initial Sustainable Yield was established using the best available information at the time, including results from the 2016 BVHM, and provided a starting point for the implementation of the Basin’s Rampdown of pumping.

The Watermaster completed the first redetermination of the Sustainable Yield in December 2024, in accordance with the schedule specified in Section III.F of the Judgment. The Sustainable Yield was redetermined as 7,952 afy based on updated data, a refined water-balance method, and results from the most recently calibrated version of the BVHM (the 2022 BVHM). This first redetermination of the Sustainable Yield, referred as the 2025 Sustainable Yield, applies to the second five-year period of

¹⁶ <https://borregospringswatermaster.com/wp-content/uploads/2023/01/Application-for-New-De-Min-Pumping.pdf>

¹⁷ See Judgment Sections I.A.57, II.E, III.F, and IV.G

implementation from WY 2026 through 2030. See Section 3.4.1 for more information on the process to redetermine the 2025 Sustainable Yield.

As required by Section III.F of the Judgment, the Watermaster will continue to refine and redetermine the Sustainable Yield every five years through 2035 to reflect new information, improved data and tools, and advances in Basin understanding. The schedule for future redeterminations of the Sustainable Yield is as follows:

- By January 1, 2030 – Establish the Sustainable Yield for the Third Five-Year Period of WY 2031 through WY 2035.
- By January 1, 2035 – Establish the Sustainable Yield for the Fourth Five-Year Period of WY 2036 through WY 2040.

Pumping Rampdown Schedule.¹⁸ Rampdown is defined as the reduction in cumulative authorized pumping of BPA imposed pursuant to the terms of the Judgment to alleviate the Overdraft of the Basin and achieve sustainable groundwater management and the reasonable and beneficial use of the Basin’s water resources. To ensure that the Annual Allocation does not exceed the Sustainable Yield of the Basin by 2040, the Judgment provides for an annual Rampdown schedule for Parties with BPA. The Rampdown amount is intended to be adjusted, as necessary, after each scheduled update of the Sustainable Yield estimate goes into effect (e.g., WY 2026, WY 2031, and WY 2036). Section III.F.8 of the Judgment defines the framework for establishing the Rampdown schedule under the Initial Sustainable Yield and subsequent redeterminations as follows:

- **First five-year period (WY 2021 – 2025):** The Rampdown rate is set at an annual reduction of five percent each year, such that in WY 2025 the Annual Allocation is 75 percent of BPA.
- **Second five-year period (WY 2026 – 2030):** The Rampdown Rate and the 2030 Target will be adjusted if the revised estimate of Sustainable Yield for the Second Five Year Period differs from the Initial Sustainable Yield of 5,700 afy. If the Sustainable Yield for the Second Five Year Period is revised, the Rampdown Rate and the 2030 Target will be reduced or increased, proportional to the percentage that the revised estimate of Sustainable Yield exceeds or falls below 5,700 afy, thus achieving a cumulative quantity of all Pumper’s Annual Allocation equal to the mid-point between the revised estimate of Sustainable Yield and the cumulative quantity of all Pumper’s BPA by WY 2030.
- **Final ten-year period (WY 2031 – 2040):** The Annual Rampdown Rate for each Water Year of the Third Five-Year Period will be calculated to reduce the then cumulative allowed pumping (i.e., cumulative Annual Allocation in effect for WY 2029-2030) over 10 years to equal the revised determination of Sustainable Yield by WY 2039-2040. Thus, the Annual Rampdown Rate will be established by dividing the necessary ten-year cumulative Rampdown by ten or will be reduced or increased proportional to the change in the Sustainable Yield for the Third or Fourth Five Year Period so that by WY 2040, the total pumping allocation equals the Sustainable Yield.

In WY 2025, the Watermaster redetermined the 2025 Sustainable Yield as 7,952 afy, an approximate 40 percent increase relative to the Initial Sustainable Yield. Consistent with the Judgment requirements, the increase in the Sustainable Yield changed the Rampdown schedule beginning in the Second Five Year

¹⁸ See Judgment Sections I.A.5, III.E, and III.F

Period (WY 2026 - 2030). Under the Rampdown schedule to the 2025 Sustainable Yield, the Annual Allocation is ramped down to 66 percent of BPA (34 percent reduction) by WY 2030 and to 33 percent of BPA (67 percent reduction) over the 20-year implementation period. See Section 3.4.1 for more information on the changes to the Rampdown schedule under the 2025 Sustainable Yield.

Allowance for Carryover.¹⁹ The Judgment allows for a Party's unused Annual Allocation to be carried over for use in subsequent water years, subject to certain restrictions defined in Section III.B of the Judgment. Initially, the maximum quantity of Carryover that a Party can accrue is two times the amount of the Party's BPA (2x BPA). The rights of the ABDSP and BSUSD are not eligible for Carryover.

Any Carryover exercised in excess of the Annual Allocation in any year (or in excess of the Sustainable Yield in 2040 and beyond) represents Annual Allocation water that was treated as pumped in an earlier water year in compliance with production allocations for that earlier year and does not, by virtue of its exercise, constitute noncompliance with the production allocation framework established by the Judgment.

Carryover is subject to periodic review and adjustment by the Watermaster to prevent Undesirable Results. The first prescribed review of Carryover was completed by January 1, 2025, in which the Watermaster elected to maintain existing Carryover Rules under the condition that the rules be re-evaluated by January 1, 2030 (see Section 3.5 of this Annual Report for more information).

Allowance for Leases and Transfers of BPA.²⁰ In the interest of advancing the effective and efficient management of the Basin, all BPA may be permanently transferred or leased, subject to the procedures and limitations defined in the Judgment. All transfers, with the exception of Permanent Transfers of BPA that include a fee interest in the associated BPA parcels or a Permanent Transfer of a Party's BPA to other overlying parcels owned by that Party, are subject to Watermaster approval. And, the Watermaster, with input from the TAC, "may restrict Permanent Transfers and Leases to specific areas of the Basin based on reasonable evidenced-based concern that the Permanent Transfer or Lease will cause or exacerbate Undesirable Results, and then only in a manner that is equitable to all affected Pumpers" (Judgment Section III.I.5).

Remedies and Penalties for Overproduction.²¹ The Judgment provides remedies for Overproduction of annual pumping limits and provides Watermaster the authority to establish penalty assessments that are not less than \$500 per af of Overproduction.

Fallowing Standards.²² For the purposes of avoiding blight associated with dead agricultural vegetation and to reduce potential air quality and public health impacts from wind-blown dust, if all or any portion of BPA is to be permanently transferred to another Party by way of permanently fallowing any portion of a Party's irrigated tree crop, the portion permanently retired from irrigation will follow any and all County standards as may be promulgated under the County's land use authority, including any standards imposed under any applicable CEQA document, as may apply. Provided, however, that the Minimum Fallowing Standards described in Judgment Exhibit 3 serve as the minimum fallowing standards, as supplemented by any County imposed fallowing standards. Fallowing standards may also be applicable to multi-year leases under certain conditions, per Judgment Section III.J.3.

¹⁹ See Judgment Sections I.A.12, III.B, and IV.E.4

²⁰ See Judgment Sections III.I and III.J

²¹ See Judgment Sections III.G and V.2

²² See Judgment Section III.J

1.3.2 Groundwater Management Plan

The 2020 GMP document includes the scientific and other background information about the Basin required by SGMA and its implementing regulations. It describes the Basin, historical groundwater conditions and trends, the initial estimate of Sustainable Yield of 5,700 afy, the Sustainable Management Criteria (SMC) (e.g., sustainability indicators, Minimum Thresholds, and Measurable Objectives), the groundwater level and groundwater-quality monitoring program to be used to track progress over time, and Projects and Management Actions (PMAs) to achieve sustainability.

The GMP is subject to a comprehensive assessment every five years to comply with SGMA. The objective is to assess progress towards achieving sustainability in consideration of new data, updated analyses, and new information since the adoption of the Physical Solution. The assessment process may result in updating the 2020 GMP, such as documenting updated information about the hydrogeology of the Basin and revising SMC, the monitoring program, and/or PMAs. The 5-Year Assessment and any changes to the GMP must be documented and submitted to the DWR. The first 5-Year Assessment Report and a redline of the GMP (if applicable) is due to the DWR by June 2026 (as documented in the February 2025 DWR Staff Assessment Report approving the Judgment and GMP as an Alternative Plan). See Section 3.8 of this Annual Report for more information on the 5-Year Assessment.

1.3.2.1 Overview of Sustainable Management Criteria in the 2020 GMP

The Sustainability Goal defined in the GMP is to ensure that by 2040 the Basin is operated within its Sustainable Yield without causing Undesirable Results. The main Undesirable Results to be avoided are significant and unreasonable occurrences of the following Sustainability Indicators: chronic lowering of groundwater levels; reductions in groundwater storage; and degradation of groundwater quality.

The 2020 GMP included initial SMC, including Minimum Thresholds and Measurable Objectives, for the Sustainability Indicators determined to be a current and/or potential future undesirable result of groundwater management. The SMC defined in the 2020 GMP, and that informed the elements of the Physical Solution of the Judgment described in Section 1.3.1 of this Annual Report, are summarized below.

Reduction of Groundwater in Storage. The sustainability goal of the Physical Solution is to halt the overdraft condition in the Basin by bringing the groundwater pumping in balance with the Sustainable Yield by 2040. This goal will be accomplished through implementation of a Pumping Rampdown. Progress is monitored by metering all non-De Minimis pumping and implementing the groundwater level monitoring program. Pumping and groundwater levels, along with other data, will be used to refine the estimate of the Sustainable Yield every five years through 2035. This work will also include assessments of the change in groundwater storage over time.

Chronic Lowering of Groundwater Levels. The sustainability goal is to stabilize groundwater levels to ensure groundwater is maintained at adequate levels, as defined at Representative Monitoring Wells. Progress in achieving this goal through the Pumping Rampdown and other means will be assessed by comparing observed groundwater levels to historical trends, Interim Milestones, Minimum Thresholds, Measurable Objectives, and groundwater level projections from the BVHM.

Degraded Groundwater Quality. The sustainability goals for groundwater quality are for (1) the potable water supply to continue to meet California Title 22 drinking water standards and (2) the non-potable irrigation supply to be suitable for agricultural and recreational uses. Progress in achieving this goal will be assessed by monitoring groundwater quality through Physical Solution implementation.

1.3.2.2 Overview of GMP Projects and Management Actions

The technical information in the 2020 GMP informed the elements of the Physical Solution of the Judgment described in Section 1.3.1 of this Annual Report. The primary management tool to eliminate overdraft is to Rampdown pumping to a level that does not exceed the Basin’s estimated Sustainable Yield by 2040 – a Rampdown that will be on the order of 33 percent of BPA or a 67 percent reduction in pumping²³ relative to pre-SGMA conditions. As previously described, the Physical Solution for the Basin consists of the Judgment and the GMP. The Judgment must be considered together with the GMP in describing PMAs. The provisions of the Judgment control over and supersede any contrary provisions contained in the 2020 GMP (Judgment Section A, p. 5). A total of six PMAs are described in the GMP and the Judgment contains provisions that directly implement or indirectly support the intent of the PMAs. The PMAs listed in the GMP include:

PMA No. 1 – Water Trading Program. The intent of the water trading program is to create a mechanism for Parties to lease and transfer the water rights needed to maintain economic activities in the Basin and facilitate adjustment to the required Rampdown. The Judgment immediately and directly implements this PMA by authorizing and defining procedures for the transfer and lease of BPA, pumping allocations, and Carryover. The relevant procedures are specified in Sections III.I and III.J. The Watermaster maintains documentation of all transfers and reviews each transaction to address consistency with the Judgment.

PMA No. 2 – Water Conservation Program. The Water Conservation Program described in the GMP consists of separate programmatic components to evaluate and advance water conservation for the three primary water use sectors in the Basin: agricultural, municipal, and recreation. The ability to implement a programmatic water conservation program by any sector will be dependent upon securing funding, such as through grants and low interest loan programs. Regardless of any Pumpers’ ability to secure funding to implement this PMA, the Judgment requires Rampdown of pumping by all BPA Parties.

PMA No. 3 – Pumping Reduction Program. Reduction of pumping is the primary tool of the Physical Solution to achieve sustainability. As described in Section 1.3.1, the Judgment directly implements this PMA through the Rampdown provisions, which include implementation and enforcement processes and provides for the periodic re-evaluation of the Sustainable Yield. Under the Rampdown, except for the water allocations for the ABDSP and BSUSD, each BPA Party’s Annual Allocation is reduced incrementally such that the total extraction from the Basin by 2040 will equal the then-current estimate of Sustainable Yield. The implementation and enforcement mechanisms defined in the Judgment include mandatory water metering and reporting for all non-De Minimis groundwater users and monetary penalties for pumping in excess of allowances afforded by the Annual Allocation and Carryover.

PMA No. 4 – Voluntary Fallowing of Agricultural Land. The intent of the voluntary fallowing program is to create a mechanism to facilitate the responsible conversion of high water use irrigated agriculture to lower water use open space, public land, or other development. The Judgment specifies minimum fallowing standards that must be implemented in connection with the permanent transfers of BPA or long-term leases of BPA that result in fallowing agricultural land (Judgment Section III.J and Exhibit 3).

PMA No. 5 – Water Quality Optimization. The intent of the Water Quality Optimization program would be to identify as-needed direct and indirect treatment options for BWD and other Pumpers to optimize groundwater quality and its use and minimize the need for expensive water treatment to meet drinking water standards. The Judgment provides that Watermaster will (1) implement a groundwater quality

²³ Under the Rampdown to the 2025 Sustainable Yield of 7,952 afy.

monitoring program to support characterization of water quality and trends over time and (2) determine if changes in water quality are significant and unreasonable following consideration of the cause of impact, the affected beneficial use, potential remedies, input from the TAC, and subject to approval by the Court exercising independent judgment (Judgment Section VI.B.2).

PMA No. 6 – Intra-Subbasin Water Transfers. The purpose of an intra-subbasin transfer program would be to physically mitigate existing and future reductions in groundwater storage and groundwater quality impairment, through pumping optimization and establishing intra-basin conveyance capability, subject to feasibility and effectiveness evaluations. The GMP describes PMA No. 6 as a mechanism that could relocate groundwater pumping from areas with more stressed conditions (e.g., declining levels or poorer water quality) to areas where groundwater conditions are more favorable for continued extraction and to optimize Basin-wide pumping patterns that would prevent Undesirable Results. Under Section III.I.5 of the Judgment, in order to protect the Basin against Undesirable Results, the Watermaster, with input from the TAC, may restrict Permanent Transfers and Leases to specific areas of the Basin based on reasonable, evidence-based concern that a Permanent Transfer or Lease will cause or exacerbate Undesirable Results, and then only in a manner that is equitable to all affected Pumpers. The Judgment does not specify that PMA No. 6 be implemented, though the PMA may be necessitated if transfers need to be restricted to avoid Undesirable Results.

1.4 Watermaster Powers and Responsibilities

To assist the Court in the Administration of the Judgment, the Court established the Borrego Springs Watermaster. The Watermaster is charged with administering and enforcing the provisions of the Judgment, including implementation of the Physical Solution, and any other instructions or orders of the Court. The specific powers, authorities, and duties of the Watermaster are defined in the Judgment. The Watermaster must carry out its duties, powers, and responsibilities in an impartial manner without favor or prejudice to any Pumper, Party, Management Area, or purpose of use.

The Watermaster is comprised of a Board of five members representing the following interests in the Basin—municipal (BWD), agricultural, recreational, community, and the County—and may hire employees or contractors, as needed, to enable administration of the Judgment. The Watermaster operates pursuant to the Rules and Regulations, attached as Exhibit 5 to the Judgment, and which may be amended by Supermajority Vote following a public hearing (Judgment Section IV.D).

The following are some of the key responsibilities of the Watermaster in administering the Judgment:²⁴

- **Establish an Annual Budget.** The Watermaster must approve an annual budget that defines the operating and capital expenses required to administer the Judgment. The budget must also define the revenues and cash reserves that will be collected or used to fund the budget. Section IV.E.3 of the Judgment defines a detailed process and schedule for developing the annual budget and collecting pumping assessments to fund the budget. The Judgment also defines a separate process and schedule (Judgment Section III.F) by which the TAC advises the Watermaster on the scope of work and budget for technical work specific to redetermination of the Sustainable Yield.
- **Levy Pumping Assessments.** The annual Watermaster Budget costs in excess of loans, grants, and available Overproduction Penalty Assessments are funded by a uniform

²⁴ This is not intended to be a complete list of duties or responsibilities pursuant to the Judgment.

pumping assessment, expressed as a cost in dollars per af (\$/af) and each Party's assessment is based on their annual Adjusted Pumping Calculation (see Section 4.0 of this Report for details). Assessments are collected in two installment payments each WY in December and June.

- **Metering and Pumping Reports.** Watermaster is responsible for collecting data from the Parties to track groundwater pumping and annually verify that pumping meters meet the accuracy standards defined in Article V of the Rules and Regulations. Section VI.A of the Judgment specifies the well metering requirements of the Parties. Watermaster develops and periodically adapts the meter reporting frequency and schedule in consultation with the TAC to ensure data is sufficient to support calculations of Sustainable Yield.
- **Water Rights Accounting.** Watermaster is responsible for performing water rights accounting on an annual basis to track pumping, Carryover elections, transfers, and leases between the Parties, and to calculate (1) the Adjusted Pumping Calculation on which assessments for the ensuing year are based and (2) the total allowable pumping by Party for the ensuing year. Section IV.E.4 of the Judgment defines the process to compute the Adjusted Pumping Calculation (see Section 4 of this Report for details).
- **Monitoring Programs.** Watermaster is responsible for implementing monitoring programs and collecting data from the Parties that enable the annual reporting of Basin conditions to the DWR pursuant to SGMA, to support the periodic recalculation of Sustainable Yield, and to support the periodic assessment and update of the GMP.²⁵ Section IV.B of the Judgment provides for a schedule and process to establish a Groundwater Quality Monitoring Plan (WQMP).
- **Unauthorized Pumping.** The Watermaster shall undertake any action, including bringing any motion to the Court, necessary to halt unauthorized pumping.
- **Meetings with the Technical Advisory Committee.** The TAC is the advisory body established pursuant to Section IV.G.I of the Judgment to study technical aspects of the Basin and to issue recommendations to Watermaster based on such technical study for the purpose of achieving sustainable groundwater management in the Basin in an effective and efficient manner, consistent with the rights and obligations of the Parties established by the Judgment. The Judgment defines the role of the TAC in advising the Watermaster and the process for striving for consensus recommendations. The Watermaster is responsible for convening the TAC at least twice per year to review Watermaster activities and to receive advisory recommendations.
- **Establishment of EWG.** Per the Judgment, the Watermaster has established an EWG to advise the Watermaster on groundwater dependent ecosystems (GDE) and any other matters approved by the Watermaster. An EWG budget, which shall be adequate for the EWG to carry out its responsibilities as directed by the Watermaster, is included in the Watermaster's annual budget.
- **Annual Report.** Watermaster is responsible for preparing an annual report to the Court.

²⁵ Title 23 § 356.4 of the CCR requires an assessment of GSPs, including Alternative Plans, once every five years. The written assessment must describe whether implementation of the alternative, including implementation of projects and management actions, is meeting the sustainability goal in the basin, and shall include detailed information as stated in 23 CCR §356.4, including how any recommended actions identified in the Department's written assessment of the alternative are being addressed.

To support the development of policy and management actions in accordance with its powers and duties under the Judgment, the Board approved an official *Policy Regarding the Use of Best Available Science*. The purpose of the policy is to delineate how the Borrego Springs Watermaster employs the concept of “best available science” when administering and enforcing the Judgment. Consistent with state law, “best available science” is a standard used in service of policy decisions made by the Watermaster to ensure the quality and relevance of the technical information and data that inform those choices. Compliance with this policy will ensure the efficient use of the Watermaster’s limited resources and that technical information and data will be evaluated in a manner that is impartial, and without favor or prejudice to any Pumper or Party.

1.5 Annual Reporting Compliance

1.5.1 Judgment Compliance

Section IV.E.5 of the Judgment defines the minimum reporting requirements to the Court. Table 1 is a reference guide that illustrates where each of the required annual reporting elements can be found within this report.

Table 1. Judgment Requirements Guide Map for the Borrego Springs Subbasin WY 2025 Annual Report	
Judgment Requirement	Section(s) and Page Number(s) in the Annual Report
Annual fiscal report of the operation of Watermaster during the preceding Water Year	Section 2.9.2 – WY 2025 Budget Status and Annual Audit: Pages 24-26
Audit of all assessments and expenditures by Watermaster	Appendix C – WY 2025 Financial Audit
Summary of the management of the Basin and Watermaster activities pursuant to the Judgment	Section 2 – Watermaster Administrative Activities: Pages 19-28 Section 3 – Watermaster Technical Activities: Pages 29-56 Section 6 – Summary of Physical Solution Implementation Progress: Pages 127-130 Appendix A – Watermaster Board Motions – WY 2025
Summary of aggregate pumping	Section 4.3 – Adjusted Pumping Calculation for WY 2025: Page 61
Record of Leases and Permanent Transfers of BPA and the amount of Carryover held by each Party	Section 4.2 – Permanent Transfers and Leases: Pages 59-61 Section 4.3 – Adjusted Pumping Calculation for WY 2025: Page 61
Any recommendations to the Court concerning further orders to advance the management of the Basin	Section 2.8 – Judgment Amendments: Page 22
DWR reporting requirements to satisfy SGMA	Table 2. Alternative Annual Report Elements Guide Map for the Borrego Springs Subbasin WY 2025 Annual Report: Page 18

1.5.2 Sustainable Groundwater Management Act Compliance

SGMA regulations require that an annual report be submitted to the DWR by April 1 of each year following the adoption of the GSP or Alternative Plan. This Annual Report provides the Basin conditions update as of WY 2025 (October 1, 2024 through September 30, 2025). Table 2 is a reference guide that illustrates where each of the required annual reporting elements described in CCR Article 7, Section 356.2 can be found within this report.

Table 2. Alternative Annual Report Elements Guide Map for the Borrego Springs Subbasin WY 2025 Annual Report

CCR – GSP Regulation Sections	Alternative Elements	Document which section(s), page number(s), or briefly describe why that Alternative element does not apply to the entity.
Article 7	Annual Reports and Periodic Evaluations by the Agency	
§ 356.2	Annual Reports	
Each Agency shall submit an annual report to the Department by April 1 of each year following the adoption of the Plan. The annual report shall include the following components for the preceding water year:		
(a)	General information, including an executive summary and a location map depicting the basin covered by the report.	Executive Summary: Pages 1-4 Section 1 – Introduction and Background: Pages 5-18 Borrego Springs Groundwater Subbasin Location: Figure 1 (Page 7)
(b)	A detailed description and graphical representation of the following conditions of the basin managed in the Plan:	Section 5 – Borrego Springs Subbasin Hydrogeologic Conditions: Pages 69-127
(1)	Groundwater elevation data from monitoring wells identified in the monitoring network shall be analyzed and displayed as follows:	--
(A)	Groundwater elevation contour maps for each principal aquifer in the basin illustrating, at a minimum, the seasonal high and seasonal low groundwater conditions.	Spring 2025 contours: Figure 11 (Page 88) Fall 2025 contours: Figure 12 (Page 89)
(B)	Hydrographs of groundwater elevations and water year type using historical data to the greatest extent available, including from January 1, 2015, to current reporting year.	Time History of Groundwater Levels for Selected Wells: Figure 10 (Page 87) Historical groundwater elevation time-series for Representative Monitoring Wells: Figures 13a-13p (Pages 92-108) Appendix G – Appendix G – Groundwater Level Time Histories (1950–2025)
(2)	Groundwater extraction for the preceding water year. Data shall be collected using the best available measurement methods and shall be presented in a table that summarizes groundwater extractions by water use sector, and identifies the method of measurement (direct or estimate) and accuracy of measurements, and a map that illustrates the general location and volume of groundwater extractions.	Section 5.4.1: Groundwater Pumping: Pages 78-84 Time-series chart of historical groundwater pumping: Figure 7 (Page 79) General groundwater extraction locations/volumes: Figure 8 (Page 82) Annual Groundwater Pumping by Sector – 2015 to 2025: Figure 9 (Page 83) Groundwater Pumping by Sector 2015 to 2025: Table 20 (Page 84)
(3)	Surface water supply used or available for use, for groundwater recharge or in-lieu use shall be reported based on quantitative data that describes the annual volume and sources for the preceding water year.	Section 5.4.2 - Surface Water Use: Page 85
(4)	Total water use shall be collected using the best available measurement methods and shall be reported in a table that summarizes total water use by water use sector, water source type, and identifies the method of measurement (direct or estimate) and accuracy of measurements. Existing water use data from the most recent Urban Water Management Plans or Agricultural Water Management Plans within the basin may be used, as long as the data are reported by water year.	Section 5.4.3 - Total Water Use: Page 85
(5)	Change in groundwater in storage shall include the following:	Section 5.5.2 - Change in Groundwater Storage: Pages 110-119
(A)	Change in groundwater in storage maps for each principal aquifer in the basin.	Change in Groundwater Storage Fall 2024 to Fall 2025: Figure 17 (Page 116)
(B)	A graph depicting water year type, groundwater use, the annual change in groundwater in storage, and the cumulative change in groundwater in storage for the basin based on historical data to the greatest extent available, including from January 1, 2015, to the current reporting year.	Annual and Cumulative Change in Groundwater Storage: Table 22 (Page 115) Annual Groundwater Extractions and Change in Groundwater Storage– 2015 to 2025: Figure 18 (Page 119)
(c)	A description of progress towards implementing the Plan, including achieving interim milestones, and implementation of projects or management actions since the previous annual report.	Section 6: Physical Solution Implementation Progress: Pages 127-130

2.0 WATERMASTER ADMINISTRATIVE ACTIVITIES

Watermaster conducts business and reports on its business, finances, and water rights accounting on a WY basis. This report summarizes the Watermaster’s administrative activities for WY 2025: October 1, 2024 through September 30, 2025.

2.1 Watermaster Board

The Watermaster Board is comprised of five members, with each member having one vote. The membership of the Board is comprised of one representative and one alternate representing the municipal sector (BWD), the agricultural sector, the recreational sector, the public/community, and the County. The processes for selecting the respective agricultural, recreational, and public/community representatives are described in Exhibit 7 of the Judgment. During the reporting period, the Board was comprised of the representatives and officer appointments listed in Tables 3a and 3b. Chairperson Dave Duncan retired from the Board in June 2025 and the slate of representatives was updated at the July 16, 2025 Watermaster Board meeting.

Entity/Sector	Board Representative	Board Alternate	Appointment
Borrego Water District	Dave Duncan	Kathy Dice	Chairperson
Agricultural Sector	Tyler Bilyk	Mike Seley	Vice Chairperson
Recreational Sector	Shannon Smith	Rich Pinel	Treasurer / Secretary
Community Representative	Mark Jorgensen	Jim Dax	-
County of San Diego	Jim Bennett, PG, CHG	Leanne Crow, PG (Oct '24 to February '25)	-

Entity/Sector	Board Representative	Board Alternate	Appointment
Borrego Water District	Gina Moran	Kathy Dice	-
Agricultural Sector	Tyler Bilyk	Mike Seley	Chairperson
Recreational Sector	Shannon Smith	Rich Pinel	Treasurer / Secretary
Community Representative	Mark Jorgensen	Jim Dax	-
County of San Diego	Jim Bennett, PG, CHG	-	Vice Chairperson

2.2 Watermaster Staff

The Watermaster may hire employees or contractors, as needed, to enable administration of the Judgment. Section IV.C of the Judgment describes the specific process the Board must follow in hiring staff to avoid a potential conflict of interest. Any technical advisor, attorney, executive director, or similar employee or contractor performing services that concern technical or policy matters of the Watermaster must be independent (not under contract with any Party) and selected by the Watermaster through an arms-length request for proposal (RFP) process unless otherwise agreed by a Supermajority Vote of the Board. These procedures were followed to establish Watermaster’s current staff.

Legal Counsel. In July 2020, the Watermaster contracted James M. Markman of Richards, Watson & Gershon (RWG Law) to serve as legal counsel. Attorneys at RWG Law support Mr. Markman, as needed.

Executive Director and Technical Services. In August 2020, the Watermaster contracted with West Yost²⁶ to retain Samantha Adams as the Executive Director and Andy Malone, PG as the Lead Technical Consultant. Ms. Adams and Mr. Malone are supported by West Yost financial, administrative, and technical staff in the performance of their administrative and technical duties, as needed. The contract was established for an initial 2.5-year period, with an expiration date of December 31, 2022. The contract has been updated and extended since. Most recently, in WY 2025, Watermaster amended the contract to extend the contract expiration date through December 31, 2026.

2.3 Watermaster Contact Information and Website

Correspondence and inquiries regarding meetings or other Watermaster business can be sent to Watermaster via email at borregospringswm@westyost.com or via regular mail to:

Borrego Springs Watermaster
c/o West Yost
25 Edelman, Suite 120
Irvine, CA 92618
(949) 420-3030

The Watermaster maintains a website to keep the Parties and public informed about its activities and to provide other important forms, documents, and information associated with the administration of the Judgment. The website address is: <https://borregospringswatermaster.com>.

2.4 Watermaster Service and Distribution Lists

Watermaster notifies Parties and interested stakeholders of its activities and actions through maintenance and use of two notice lists: a Court Service List and an Email Distribution List.

The Court Service List contains the contact information for all Parties in the case that resulted in the Judgment (*Borrego Water District v. All Persons Who Claim a Right to Extract Groundwater in the Borrego Valley Groundwater Subbasin, et al.*, San Diego Superior Court Case No. 37-2020-00005776). The Court Service List is used to provide Parties with electronic copies of all documents filed with the Court, including notices and motions filed by a party or the Watermaster, and Court orders. The Court Service List is maintained by Legal Counsel. To be added or removed from the Court Service List, a Party must notify the Court and other Parties and file a Form MC-040²⁷, "Notice of Change of Address or Other Contact Information," with the Court. Parties may contact Legal Counsel to receive assistance with filing Form MC-040 or to receive copies of the Court Service List via email at JMarkman@rwglaw.com and JMetz@rwglaw.com.

The Email Distribution List includes members of the Board, the TAC, the EWG and interested members of the public. The Email Distribution List is used for notification of Watermaster activities, including (but not limited to): regular and special Board meetings, TAC and EWG meetings, the completion of Water Rights

²⁶ The contract was originally executed with Wildermuth Environmental Inc., who was later acquired by West Yost on November 9, 2020.

²⁷ MC-040 Forms are available at: <https://selfhelp.courts.ca.gov/jcc-form/MC-040>

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Accounting, publication of the annual budget, and noticing the draft and final Annual Report. In addition, the Email Distribution List receives all materials that support Watermaster activities, such as the agenda and agenda package for Watermaster Board, TAC, and EWG meetings. The Email Distribution List is maintained by Watermaster staff. To be added to or removed from the Email Distribution List, please contact Watermaster staff via email at borregospringswm@westyost.com.

2.5 Watermaster Meetings and Board Actions

In WY 2025, the Watermaster conducted its monthly Board meetings on the third Wednesday of the month. The Watermaster also holds Special meetings, as needed to conduct business between regularly scheduled meetings. All Watermaster meetings are open to the public and are noticed via Watermaster’s Email Distribution List and website.

During WY 2025, the Watermaster Board held a total of 12 Regular Meetings and one Special Meeting. Most meetings of the Board were held virtually. The virtual meetings were conducted via the GoToMeeting® platform that has both telephone and video call-in options. The Board held one of its meetings in-person at the Borrego Springs Library (that also provided for virtual attendance via GoToMeeting). Table 4 lists the Board meeting dates for WY 2025.

Electronic copies of all Board meeting agendas, packets, presentation materials, recordings, and approved minutes are available on Watermaster’s website. Appendix A of this Annual Report contains a record of the Board’s motions and actions for WY 2025.

Meeting Date	Meeting Type	Meeting Platform
October 10, 2024	Regular	Virtual
November 7, 2024	Regular	In-Person at the Borrego Springs Library
December 5, 2024	Regular	Virtual
December 19, 2024	Special	Virtual
January 15, 2025	Regular	Virtual
February 19, 2025	Regular	Virtual
March 19, 2025	Regular	Virtual
April 16, 2025	Regular	Virtual
May 21, 2025	Regular	Virtual
June 18, 2025	Regular	Virtual
July 16, 2025	Regular	Virtual
August 20, 2025	Regular	Virtual
September 17, 2025	Regular	Virtual

2.6 Rules and Regulations

The Rules and Regulations are included with the Judgment as Exhibit 5. A copy is posted to the Watermaster [website](#).²⁸ The Judgment specifies that Rules and Regulations may only be amended by a

²⁸ <https://borregospringswatermaster.com/wp-content/uploads/2020/12/rules-and-regulations-1.pdf>

Supermajority Vote of the Watermaster Board. All amendments must be consistent with the Judgment and, at the request of the Watermaster Board or any Party with objections, must be reviewed and approved by the Court before any proposed changes become effective. During the reporting period, no changes to the Rules and Regulations were considered.

2.7 Board Resolutions

Table 5 lists the Board resolutions adopted during WY 2025. All resolutions and policies are available on Watermaster’s [website](#).²⁹

Table 5. Watermaster Board Resolutions Adopted in WY 2025		
Resolution Number	Resolution Date	Resolution Title
25-01	September 17, 2025	Establishing a Revised Metering Program

2.8 Judgment Amendments

No amendments to the Judgment were made in WY 2025. Appendix B of this Annual Report contains a record of all amendments to the Judgment.

2.9 Financial Management

Each year, Watermaster develops a budget that defines the operating expenses required to administer the Judgment in the ensuing year. The operating budget covers administrative services (including costs for financial audit, insurance, website, and miscellaneous expenses), legal services, engineering and technical services, funding to support the EWG, and reimbursable services to parties with manual-read meters.³⁰ The budget also defines the revenue sources that will fund the operating expenses and maintain cash reserves at a specific level. Under normal operative conditions, the Watermaster has a reserve goal of nine months of operating expenses.

Section IV.E.3 of the Judgment defines a detailed process and schedule for developing the annual budget and collecting pumping assessments to fund the budget. Section III.F of the Judgment also defines a separate process and periodic schedule by which the TAC advises the Watermaster on the scope of work and budget for technical work to redetermine the Sustainable Yield. The TAC has advised or shall advise the Watermaster on the technical scope and budget as follows:

- By June 1, 2021, TAC to reach agreement on the scope and budget for technical work for October 1, 2021 through September 30, 2023 (completed).
- By January 1, 2025, TAC to reach agreement on the scope and budget for technical work for October 1, 2025 through September 30, 2029 (completed in WY 2025, see Section 3.4.2).

²⁹ <https://borregospringswatermaster.com/watermaster-resolutions/>

³⁰ The Judgment provides that all parties will install “smart” pumping meters that can be read via telemetry system. At the option of the Parties, manual-read meters may be installed, however the Party must cover all costs associated with collecting data manually. The costs include contract services with the BWD to perform the field work to manually read/record the meters and Watermaster staff time to coordinate with the BWD field crew and to collect self-reported meter reads in-between official Watermaster meter-read events.

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- By January 1, 2030, TAC to reach agreement on the scope and budget for technical work for October 1, 2030 through September 30, 2034.

To fund the annual budget, Watermaster levies pumping assessments to all active BPA Pumpers. Watermaster can also rely on the following sources to fund the budget:

- Cash reserves
- Overproduction Penalty Assessments
- Grants and loans

Watermaster staff utilizes a detailed monthly financial model to support the development of the annual budget. The financial model was first developed to support vendor payment terms that would be needed to enable Watermaster to accept over two million dollars in grant funding from DWR through March 2025. The Watermaster now uses the financial model annually, and as needed, to support development or amendment of the annual budget.

Watermaster staff prepares monthly financial reports for review by the Board as part of the Consent Calendar during regular Board meetings. At a minimum, the monthly financial reports include the following:

- Income (Profit & Loss) Statement
- Balance Sheet
- Expense Distribution Detail
- Union Bank Checking Register

The following subsections describe the Watermaster's current grant funding and vendor payment terms, the final WY 2025 budget status and annual audit, and the WY 2026 budget and assessment approved in June 2025.

2.9.1 Grant Funding and Vendor Payment Terms

In December 2021, the DWR released a solicitation package for grant funding for SGMA implementation (DWR SGM grant). In this first round of grant solicitations, each of the 21 critically overdrafted basins in the state were guaranteed up to \$7.6 million in grant funding. In February 2022, on behalf of itself and four subgrantees eligible for funding, the BWD submitted a grant application package requesting \$6,115,833 in funding.³¹ Included in the grant package were two Watermaster projects:

- Monitoring, Reporting, and Groundwater Management Plan Update: \$1,983,250 funding request
- Biological Restoration of Fallowed Lands: \$755,340 funding request

The DWR SGM grant award for the Watermaster projects (\$2,738,590) covers eligible work performed for these projects from January 2022 through March 2025. The notice of grant award was made by the DWR

³¹ DWR determined that BWD was the only eligible entity (a Public Agency) to apply for the DWR SGM grant funding directly. Watermaster is a subgrantee to BWD.

in April 2022 and the grant agreement between DWR and BWD was executed on December 13, 2022. The subsequent subgrantee agreement between BWD and Watermaster was executed on February 16, 2023.

At the time the grant was being awarded, it was identified that there would be a significant delay in the timing of performing work pursuant to the grant and receiving reimbursements from DWR, thus requiring a significant working capital investment by the Watermaster to implement the grant-funded projects. Watermaster staff developed a detailed monthly financial model to estimate the working capital investment over the grant implementation period. In April 2022, the working capital investment was projected to range from about \$600,000 to \$800,000 depending on the timing of the reimbursements.

Recognizing the significant cost to the Pumpers to establish the working capital, the Watermaster explored options for financing through various financial institutions but was unable to find a solution given the unique nature of the Watermaster as an arm of the Court. The Watermaster Treasurer at the time (Smith) recommended, and the Board subsequently directed, that Staff explore the possibility of obtaining extended payment terms with the two consultants that would be implementing the projects, West Yost, and Land IQ, as a means of covering the working capital investment necessary to support implementation. The financial model was used to support the development of vendor payment terms and define an alternative cash reserve target of seven months of operating expenses for the grant funding period. West Yost and Land IQ both agreed to extended payment terms that enabled Watermaster to delay payments on invoiced amounts and maintain a fiscally sound level of cash reserves through the closeout of the grant agreement with BWD and DWR. Additionally, the Pumpers paid a special Assessment in the amount of \$200,000 to support the working capital necessary to accept the SGM grant.

For the period of the grant agreement and vendor payment terms, the Watermaster's monthly financial reports include accrual of monthly grant-reimbursable expenditures (Income Statement) and a statement of outstanding balances (including interest) owed to each vendor.

The DWR SGM grant award for technical activities ended in March 2025. Watermaster was able to expense any additional administrative and grant closeout expenses through April 2025, including the preparation and submittal of final Reimbursement Requests and Grant Completion Reports for each project.

As of September 30, 2025 DWR has reimbursed a total of \$2,728,017.31 of grant reimbursement requests. The final payment of the remaining requested balance of \$263,282.31 is expected to be paid in WY 2026. Additionally, nearly all outstanding balances associated with vendor payment terms were resolved by the end of WY 2025.³² Once all outstanding balances with vendor payment terms are paid, the Watermaster will transition back to a standard invoicing and payment process, under which consultant invoices are paid upon approval by designated Watermaster reviewers and will no longer accrue interest.

2.9.2 Water Year 2025 Budget Status and Annual Audit

The Watermaster approved the WY 2025 Budget at its June 13, 2024 meeting. The budget was amended once, and on two occasions the Board authorized changes to West Yost spending for specific line items planned in the WY 2025 Budget:

- The budget was amended on January 15, 2025 to carry forward unspent grant-related funds from WY 2024 for grant-funded tasks that were behind schedule, and therefore, underbudget.

³² As of October 31, 2025, the Watermaster has paid in full the remaining balances owed to West Yost and Land IQ upon receipt of Reimbursement Request #9 from DWR.

These tasks included technical work to support (i) the 2025 Sustainable Yield update, (ii) the conversion of inactive/abandoned wells, (iii) the 5-Year Assessment Report, and (iv) the Biological Restoration of Fallowed Lands project.

- At its June 18, 2025 meeting, the Board authorized an amendment to the West Yost WY 2025 Statement of Work to approve the use of underspent WY 2025 Budget across various technical tasks to advance the 5-Year Assessment and address DWR comments on the GMP. This authorization was only a reallocation of budget within West Yost tasks (i.e., it did not increase the amended budget approved in January 2025).
- At its August 20, 2025 meeting, the Board authorized West Yost spending up to \$5,000 above the approved EWG budget to advance the process to procure a Peer Reviewer to review of the University of California Irvine (UCI) GDE Study Report (see Section 3.7 of this Report for details on this work).

Table 6 compares the final amended WY 2025 budget to the Watermaster’s actual revenues, expenditures, and reserves for WY 2025. For the revenue section, the table details the budget and actual for the invoiced amounts, revenues paid, and unpaid balances still owed to the Watermaster. As of the end of WY 2025:

- A total of 99 percent of budgeted revenues were accrued (\$1,256,474.07).
 - The accrual shown for the DWR SGM grant reimbursement represents the amount of reimbursable expenditures requested from DWR in WY 2025 (\$901,228.39), which was about 99 percent of planned accruals.
- A total of 96 percent of budgeted expenditures was spent (\$1,422,476.69). Spending by operating category included:
 - 100 percent of budgeted Watermaster Staff Administrative services
 - 95 percent of budgeted other Administrative or Vendor services
 - 67 percent of budgeted Legal services
 - 97 percent of budgeted Technical and Engineering services
 - 98 percent of budgeted EWG services
 - 121 percent of budgeted services to parties with manual read meters (these expenditures are paid only by parties with manual read meters)
- Watermaster had a payment liability totaling \$291,643.59, which is about 105 percent of the budget.
- Cash reserves were \$738,996.64.

The financial audit for WY 2025 was performed by C.J. Brown & Company, CPAs and is included with this report as Appendix C.

Table 6. Comparison of Approved and Actual Watermaster Budget in WY 2025

Revenues, Expenditures, and Reserves	Initial Approved WY 2025 Budget June 2024	Amended WY 2025 Budget January 2025	Actual WY 2025 (Final)	Percent (%) of Budget	Variance to Date (Budget minus Actual)
Revenues	\$ 1,005,168	\$ 1,263,380	\$ 1,256,474.07	99%	\$ 6,905.93
Pumping Assessments Invoiced	\$ 350,000	\$ 350,000	\$ 338,532.40	97%	\$ 11,467.60
<i>payments received</i>			\$ 338,503.52	97%	
Bad Debt (non-payment on Assessments)	\$ (2,500)	\$ (2,500)	\$ -	0%	\$ (2,500.00)
Overproduction Penalty Assessments	\$ -	\$ -	\$ -		\$ -
Invoiced for Pass thru Expenses	\$ 7,316	\$ 7,316	\$ 16,713.28	228%	\$ (9,397.28)
<i>payments received</i>			\$ 16,713.28	228%	
DWR Prop 68 Grant Reimbursements Accrued	\$ 650,352	\$ 908,564	\$ 901,228.39	99%	\$ 7,335.61
Total Expenditures	\$ 1,213,687	\$ 1,476,038	\$ 1,422,476.69	96%	\$ 53,560.91
Administrative Services	\$ 418,432	\$ 421,598	\$ 422,960.61	100%	\$ (1,363.01)
Watermaster Staff Admin Services	\$ 290,796	\$ 290,796	\$ 291,199	100%	\$ (403.15)
<i>Board Meetings</i>	\$ 106,600	\$ 106,600	\$ 108,656.95	102%	\$ (2,057.35)
<i>Technical Advisory Committee Meetings</i>	\$ 52,444	\$ 52,444	\$ 53,445.00	102%	\$ (1,001.00)
<i>Court Hearings</i>	\$ 3,510	\$ 3,510	\$ 678.75	19%	\$ 2,831.25
<i>Stakeholder Outreach/Workshops</i>	\$ 12,543	\$ 12,543	\$ 11,976.25	95%	\$ 566.75
<i>Administration and Management</i>	\$ 78,699	\$ 78,699	\$ 79,855.30	99%	\$ (1,156.30)
<i>Prop 68 Project Admin and Grant Reporting</i>	\$ 37,000	\$ 37,000	\$ 36,586.50	99%	\$ 413.50
Other Administrative or Vendor Services	\$ 127,637	\$ 130,802	\$ 124,760.35	95%	\$ 6,041.65
<i>Financial Audit</i>	\$ 8,560	\$ 8,560	\$ 8,098.00	95%	\$ 462.00
<i>Insurance</i>	\$ 45,401	\$ 45,401	\$ 44,420.36	98%	\$ 980.64
<i>Misc. Expenses</i>	\$ 2,500	\$ 2,500	\$ 131.00	5%	\$ 2,369.00
<i>Meter Accuracy Testing Vendors</i>	\$ 13,500	\$ 13,500	\$ 14,430.00	107%	\$ (930.00)
<i>Interest on Vendor Terms During Prop 68 Grant Period</i>	\$ 57,676	\$ 60,841	\$ 57,680.99	95%	\$ 3,160.01
Pass Through Expenses	\$ -	\$ -	\$ 7,001.51		\$ (7,001.51)
<i>Reimbursement to BWD for GSP</i>	\$ -	\$ -	\$ 5.26		\$ (5.26)
<i>Pumper-Funded Request for Information</i>		\$ -	\$ 6,996.25		\$ (6,996.25)
Legal Services	\$ 105,000	\$ 105,000	\$ 70,826	67%	\$ 34,173.91
Technical/Engineering Services	\$ 523,883	\$ 701,942	\$ 683,746.44	97%	\$ 18,195.56
General Technical Consultant Services	\$ 375,643	\$ 445,524	\$ 426,625.94	96%	\$ 18,898.06
<i>Coordinate/Implement meter reading program</i>	\$ 30,440	\$ 30,440	\$ 27,179.25	89%	\$ 3,260.75
<i>Groundwater Monitoring Program</i>	\$ 124,060	\$ 124,060	\$ 97,468.33	79%	\$ 26,591.67
<i>Data Management and Reporting Data to DWR</i>	\$ 20,265	\$ 20,265	\$ 14,628.25	72%	\$ 5,636.75
<i>Annual Report to the Court and DWR</i>	\$ 51,188	\$ 51,188	\$ 51,552.95	101%	\$ (364.95)
<i>Address Inactive Wells via Abandonment/Conversion</i>	\$ 133,392	\$ 203,273	\$ 222,405.66	109%	\$ (19,132.66)
<i>As-needed technical support</i>	\$ 16,298	\$ 16,298	\$ 13,391.50	82%	\$ 2,906.50
Consulting Services with TAC Support/Input	\$ 148,240	\$ 256,418	\$ 257,120.50	100%	\$ (702.50)
<i>Technical Work to Support Sustainable Yield Updates</i>	\$ 27,973	\$ 90,590	\$ 84,850.75	94%	\$ 5,739.25
<i>Develop Scope and Budget for WY 2026-2029 for Sustainable Yield Updates</i>	\$ 15,272	\$ 15,272	\$ 15,444.00	101%	\$ (172.00)
<i>5-Year Update of the GMP (required by DWR)</i>	\$ 94,947	\$ 140,508	\$ 156,825.75	112%	\$ (16,317.75)
<i>Address Ad Hoc Requests from the Board</i>	\$ 10,048	\$ 10,048	\$ -	0%	\$ 10,048.00
Environmental Working Group	\$ 159,056	\$ 240,182	\$ 236,063.23	98%	\$ 4,118.77
<i>Biological Restoration of Fallowed Lands</i>	\$ 152,675	\$ 233,801	\$ 225,117.66	96%	\$ 8,683.34
<i>Ad Hoc EWG Meetings/Requests</i>	\$ 6,381	\$ 6,381	\$ 10,945.57	172%	\$ (4,564.57)
Services to Parties with Manual Read Meters	\$ 7,316	\$ 7,316	\$ 8,880.32	121%	\$ (1,564.32)
Liabilities on Payment Terms					
Beginning Balance	\$ 520,038	\$ 587,501	\$ 587,501.03		\$ (0)
Year-End Balance (Budget) and Current Balance	\$ 60,549	\$ 278,432	\$ 291,643.59	105%	\$ (13,211.59)
Cash Reserves					
Beginning Cash Reserves	\$ 840,000	\$ 839,254	\$ 839,254.81		
Average Target Reserve and Actual Reserve	\$ 672,671	\$ 660,488	\$ 738,996.64	112%	\$ (78,508.64)
<i>Target/Actual No. Months Operating Reserve</i>	7.00	7.00	11.57		

2.9.3 WY 2026 Budget

The Watermaster approved the WY 2026 Budget at its June 18, 2025 Regular Meeting. The full budget package is included with this report as Appendix D. Table 7 shows the approved line-item budget for WY 2026, including revenue, expenditures, deferred payment liabilities, and reserves. Table 7 also includes the projected budgets and year-end balances for WYs 2027 through 2030. These projections are not commitments to perform any of the work, or at any given value; they are for informational and planning purposes only.

Approval of the WY 2026 Budget included approval of the following:

- A WY 2026 Pumping Assessment of \$350,0000.
- An Overproduction Penalty Assessment of \$500 per acre-foot. This is the minimum rate allowed by the Judgment (Section III.G.4).
- WY 2026 Operating expenditures in the amount of \$741,152.

Following approval, Watermaster staff published the WY 2026 Budget to the Watermaster website and issued notice via the Email Distribution List. No Party challenged the approved budget.

Table 7. WY 2026 Budget and Four-Year Projection of Watermaster Operating Budget, WY 2027 through 2030
Assuming Vendor Payment Terms, 8-Month Delay in DWR Grant Request Reimbursements through 2026, and 9-month Operating Reserve

Revenues, Expenditures, and Reserves	WY 2026	Projected Budget ¹			
		WY 2027	WY 2028	WY 2029	WY 2030
Revenues²	\$ 361,020	\$ 801,621	\$ 802,000	\$ 802,390	\$ 802,791
Pumping Assessments	\$ 350,000	\$ 790,000	\$ 790,000	\$ 790,000	\$ 790,000
Bad Debt (assumed non-payment on Assessments)	\$ (1,000)	\$ (1,000)	\$ (1,000)	\$ (1,000)	\$ (1,000)
Overproduction Penalty Assessments	\$ -	\$ -	\$ -	\$ -	\$ -
Revenues Collected for Pass thru Expenses	\$ 12,020	\$ 12,621	\$ 13,000	\$ 13,390	\$ 13,791
DWR Prop 68 Grant Reimbursements ³	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenditures	\$ 741,152	\$ 791,552	\$ 850,191	\$ 866,918	\$ 854,846
Administrative Services	\$ 301,671	\$ 299,815	\$ 312,377	\$ 325,662	\$ 339,525
Watermaster Staff Admin Services	\$ 237,254	\$ 238,202	\$ 248,213	\$ 258,654	\$ 269,543
Board Meetings	\$ 104,752	\$ 99,991	\$ 104,490	\$ 109,192	\$ 114,106
Technical Advisory Committee Meetings	\$ 32,950	\$ 33,939	\$ 34,957	\$ 36,005	\$ 37,086
Court Hearings	\$ 1,512	\$ 1,588	\$ 1,659	\$ 1,734	\$ 1,812
Stakeholder Outreach/Workshops	\$ 12,846	\$ 13,231	\$ 13,628	\$ 14,037	\$ 14,458
Administration and Management	\$ 85,194	\$ 89,454	\$ 93,479	\$ 97,686	\$ 102,082
Prop 68 Project Admin and Grant Reporting	\$ -	\$ -	\$ -	\$ -	\$ -
Other Administrative or Vendor Services	\$ 64,417	\$ 61,613	\$ 64,164	\$ 67,008	\$ 69,982
Financial Audit	\$ 8,812	\$ 9,064	\$ 9,340	\$ 9,807	\$ 10,297
Insurance	\$ 48,142	\$ 50,549	\$ 52,824	\$ 55,201	\$ 57,685
Misc. Expenses	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000
Meter Accuracy Testing Vendors	\$ -	\$ -	\$ -	\$ -	\$ -
Interest on Vendor Terms During Prop 68 Grant Period ³	\$ 5,463	\$ -	\$ -	\$ -	\$ -
Pass Through Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Reimbursement to Settling Parties	\$ -	\$ -	\$ -	\$ -	\$ -
Reimbursement to BWD for GSP	\$ -	\$ -	\$ -	\$ -	\$ -
Legal Services	\$ 110,000	\$ 105,000	\$ 108,150	\$ 111,395	\$ 114,736
Technical/Engineering Services	\$ 297,462	\$ 354,116	\$ 396,665	\$ 396,472	\$ 366,793
Routine Annual Technical Consultant Services	\$ 224,870	\$ 231,616	\$ 238,565	\$ 245,722	\$ 253,093
Coordinate/Implement meter reading program	\$ 33,584	\$ 34,592	\$ 35,629	\$ 36,698	\$ 37,799
Groundwater Monitoring Program	\$ 116,969	\$ 120,478	\$ 124,092	\$ 127,815	\$ 131,650
Data Management and Data Reporting	\$ 12,276	\$ 12,644	\$ 13,024	\$ 13,414	\$ 13,817
Annual Report to the Court and DWR	\$ 51,221	\$ 52,758	\$ 54,340	\$ 55,971	\$ 57,650
As-needed technical support	\$ 10,820	\$ 11,145	\$ 11,479	\$ 11,823	\$ 12,178
Technical Consultant Services - Non-Routine	\$ 72,592	\$ 122,500	\$ 158,100	\$ 150,750	\$ 113,700
Address Inactive Wells via Abandonment/Conversion	\$ -	\$ -	\$ -	\$ -	\$ -
5-Year Assessment and Update of the GMP (includes addressing DWR RCAs)	\$ 56,850	\$ -	\$ -	\$ -	\$ 75,900
Develop Scope and Budget for future SY Updates	\$ -	\$ -	\$ -	\$ -	\$ 17,800
Technical Work to Support 2035 SY Update	\$ 15,742	\$ 102,500	\$ 138,100	\$ 130,750	\$ -
Undefined GMP Implementation Actions	\$ -	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000
Environmental Working Group	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000
Biological Restoration of Fallowed Lands	\$ -	\$ -	\$ -	\$ -	\$ -
Ad Hoc Requests and EWG Meetings	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000
Services to Parties with Manual Read Meters	\$ 12,020	\$ 12,621	\$ 13,000	\$ 13,390	\$ 13,791
Liabilities on Payment Terms⁴					
Beginning Balance	\$ 149,988	\$ -	\$ -	\$ -	\$ -
Minimum Monthly Balance	\$ -	\$ -	\$ -	\$ -	\$ -
Maximum Monthly Balance	\$ 231,058	\$ -	\$ -	\$ -	\$ -
Year-End Balance	\$ -	\$ -	\$ -	\$ -	\$ -
Cash Reserves⁵					
Beginning Cash Reserves	\$ 560,559	\$ 536,362	\$ 551,214	\$ 505,627	\$ 465,595
Year-End Cash Reserve Balance	\$ 536,362	\$ 551,214	\$ 505,627	\$ 465,595	\$ 507,093
Average Reserve to Maintain Target Operating Expenses of 9 months after Vendor Terms Paid off	\$ 555,864	\$ 593,664	\$ 637,643	\$ 650,188	\$ 641,134
Minimum Month-End Reserve Balance	\$ 479,588	\$ 445,054	\$ 383,465	\$ 396,490	\$ 396,490
Average Month-End Reserve Balance	\$ 587,706	\$ 557,778	\$ 528,558	\$ 507,093	\$ 468,808
Variance from Desired Reserve	\$ 31,842	\$ (35,886)	\$ (109,085)	\$ (143,095)	\$ (172,327)

Notes

- 1-- The projected budget is estimated based on Staff's best professional judgement as to how the cost of each line item will change over time. Some tasks increase at an assumed inflation rate of 4.5%; some tasks decrease in cost with efficiencies, followed by annual inflation increases; and some tasks fluctuate year to year based on the level of effort for non-routine work such as Sustainable Yield updates.
- 2-- Revenues are the amounts invoiced by Watermaster to pumpers, or in the case of the DWR grant, they are the accrued spending amounts that are eligible for reimbursement, during the Water Year. In the case of the DWR Reimbursements, payment on the reimbursement requests are actually delayed by 8 months from request date. This delay in payment is taken into consideration in the financial model to
- 3-- Combined interest to West Yost and Land IQ under proposed Payment Terms. Assumes prime interest rate of 9.5%.
- 4-- Reflects balances owed to West Yost and Land IQ under Payment Terms.
- 5-- Projections are developed with the monthly financial model prepared by Watermaster Staff and are based on expected timing of receipt of payment on Watermaster assessments and DWR reimbursement, and timing of payments to vendors.
- 6-- The projection assumes that the Board approves staff's recommendation to advance completion of the 5-Year Assessment of the GMP, by beginning to address the Department of Water Resources (DWR) Recommended Corrective Actions (RCAs) utilizing available time and budget in the remainder of WY 2025.

3.0 WATERMASTER TECHNICAL ACTIVITIES

This section describes the monitoring program implemented by the Watermaster to support the sustainable management of the Basin and includes the collection of climatic, surface-water, and groundwater data.

3.1 Monitoring and Data Management

These data are used to characterize and understand current Basin conditions and trends and to evaluate the Basin response to Physical Solution implementation. The data collected by Watermaster are post-processed into standardized formats, checked for quality assurance/quality control (QA/QC), and uploaded to a centralized relational database management system, HydroDaVE. The following subsections describe the Watermaster’s groundwater and surface water monitoring efforts during the reporting period.

3.1.1 Groundwater Pumping

Prior to the development of the Judgment and GMP, all municipal pumping wells and some golf course and private agricultural Pumpers were monitoring pumping via meters. Except for municipal pumping by BWD, most metered pumping was not being recorded and/or reported on a regular basis. In lieu of metered data, historical groundwater pumping was estimated using either numerical modeling with the BVHM or other water duty methods that consider the type of water use (such as area of irrigated landscape and crop types).

The Judgment requires that all non-De Minimis Pumpers install Watermaster-approved meters on all active groundwater wells to measure and record groundwater pumping. Metered pumping is reported to the Watermaster for the purpose of performing water rights accounting and technical analyses of the Basin. Each year, the Pumpers must perform a third-party verification of the accuracy of their meters.

The Watermaster has successfully implemented a program to collect monthly pumping data from Parties with a combination of Watermaster meter reads and self-reporting (via telemetry or manual-read of meters). The Board approved the following actions and resolutions to establish protocols for the metering program:³³

- Adopted Resolution 2020-02 Establishing Approved Meters (March 2020).
- Adopted Resolution 2020-03 Establishing Criteria for Verification of Meter Calibration, Installation, and Accuracy (August 2020).
- Adopted Resolution 2020-05 Establishing Meter Read Protocols and Required Documentation (September 2020).
- Established a monthly frequency for meter read reporting to effectively implement the Judgment (November 2020). The monthly reads are accomplished through a combination of official Watermaster reading events and self-reporting.
- Adopted Resolution 23-02 Establishing a Revised Comprehensive Metering Program (March 2023). Resolution 23-02 supersedes all prior actions and combines all elements of the metering program into one resolution.

³³ The meter program resolutions are available on the Watermaster’s website:
<https://borregospringswatermaster.com/pumper-resources/>.

- Adopted Resolution 25-01 Establishing a Revised Metering Program (September 2025). Resolution 25-01 supersedes all prior actions and formalizes a reduced frequency of official Watermaster meter reads to twice per year.

Parties that are not in compliance with the meter installation and reporting requirements are considered not in good standing with the Watermaster.

3.1.1.1 Status of Meter Installation

As of the end of WY 2025, the following is the status of metering the BPA and other non-De Minimis Party wells:

- There are a total of 45 Parties with pumping rights defined in the Judgment (43 Parties with Exhibit 4 BPA rights and two Parties (ABDSP and BSUSD) with other non-De Minimis pumping rights).
- Of the 45 Parties with pumping rights:
 - 28 Parties (62 percent) are confirmed Pumpers.
 - 16 Parties (36 percent) are assumed to be or have confirmed they are not active Pumpers.
 - 1 Party (2 percent) is an active Pumper but is not cooperating in the metering program and their well and pumping information is unknown.
- Among the confirmed, cooperating active pumping Parties, there are a total of 62 active pumping wells. Of these 62 active pumping wells:
 - 15 wells have smart meters installed. Full access to read the smart meters via telemetry has been provided to Watermaster staff.
 - 47 wells have manual-read meters installed. Full cooperation to read the meters through a combination of official Watermaster reads and self-reporting was provided to Watermaster for the entirety of WY 2025.
- The Watermaster achieved 99 percent compliance of the meter reading program as of the end of WY 2025.
- The one unmetered well is for the one Party who is an active Pumper but is not cooperating in the metering program.
 - In WY 2025, efforts were undertaken to engage with the one Pumper out of compliance. Despite these efforts, the Pumper has not been brought into compliance. This pumper has 4 af of BPA rights and the assumed annual pumping is 1.20 afy, based on water duty methods. This topic is an ongoing discussion at Watermaster Board meetings and will continue to be discussed in WY 2026.

3.1.1.2 Meter Reading Program

The meter reading program implemented during the reporting period was as follows:

- Watermaster maintained a monthly frequency for meter read reporting to support the effective implementation of the Judgment.
- For wells with smart meters:
 - Meter read data transmitted via telemetry was accessed and downloaded monthly by Watermaster.

- Any time a telemetric read was not available due to system errors or other technical issues, the well owners were requested to provide self-reported meter reads until the telemetry issue could be resolved.
- For manual-read meters:
 - Official Watermaster meter reads were collected quarterly by Watermaster’s meter reading consultant (BWD) in December 2025, March 2025, June 2025, and September 2025.
 - Self-reporting of meter reads was performed by the well owners in October 2024, November 2024, January 2025, February 2025, April 2025, May 2025, July 2025, and August 2025.

Metered data are reviewed and checked for QA/QC by Watermaster staff and are used to calculate monthly pumping volumes, which are stored in Watermaster’s data management system. As described in Section 3.1.1.2, metered pumping data was available for all but one well in the Basin in WY 2025 (99 percent compliance).

3.1.1.3 Meter Accuracy Testing

Meter accuracy testing is the responsibility of the well owners. In WY 2025, Watermaster supported the Parties by identifying cost savings with vendors who could perform multiple meter reads per day over a period of a few weeks. Most of the meter accuracy testing for WY 2025 was completed between January through March 2025.

All meter verification information and accuracy tests were collected and reviewed by Watermaster staff and checked for compliance with accuracy standards. If a meter test indicated that a meter is not accurately reporting pumping, Watermaster requested corrective actions within 30 days.

Of the confirmed 62 pumping wells in the Basin, all required³⁴ wells were tested for accuracy and passed within the required accuracy standard of +/- 5 percent. This marks the first year Watermaster achieved 100 percent compliance (with cooperating parties) in the annual meter verification process.

3.1.2 Groundwater Level and Quality Monitoring Program

The Watermaster conducts monitoring programs for groundwater level and quality in the Basin pursuant to the Judgment and GMP. Generally, the main objectives of the monitoring programs are to collect the data necessary to:

- Demonstrate progress toward meeting the Sustainability Goal of the GMP, which is to ensure that by 2040 the Basin is operated within its Sustainable Yield without causing Undesirable Results. The main Undesirable Results to be avoided are the significant and unreasonable occurrences of the following Sustainability Indicators: chronic lowering of groundwater levels; reductions in groundwater storage; and degradation of groundwater quality. Current conditions are compared to SMC defined in the 2020 GMP (e.g., Minimum

³⁴ Required wells are those planned to be in operation during the water year. If the well is inoperable or not planned to be operated during the water year, well owners must provide meter reads at the start and end of the water year to confirm the well did not pump. In WY 2025, a total of 56 were required to be tested. All were tested and passed within the accuracy standard.

Thresholds, Interim Milestones, and Measurable Objectives) for the Sustainability Indicators for each of the three management areas in the Basin: the NMA, CMA, and the SMA.

- Inform adaptive management of the Basin to achieve the Sustainability Goal.
- Improve the BVHM in a cost-effective manner that offers the most benefit for the resources expended.

The groundwater level and quality monitoring are performed by Watermaster staff and the BWD semi-annually in the spring and fall of each year. The Watermaster maintains a webpage dedicated to the Groundwater Monitoring Program, where interested persons can download the Groundwater Monitoring Plan (GWMP), maps of the current groundwater-level and groundwater-quality monitoring networks, and results from each semi-annual monitoring event. The GWMP information is on the website at: <https://borregospringswatermaster.com/groundwater-monitoring-program>.

3.1.2.1 Groundwater Monitoring Plan

Section VI.B of the Judgment calls for the Watermaster to develop a WQMP, with input from the TAC, within 24 months of entry of the Judgment (by April 8, 2023). The purpose of the WQMP is to understand groundwater quality and how it is changing, so that the Watermaster can determine if changes in groundwater quality are significant and unreasonable following consideration of the cause of impact, the affected beneficial use, and potential remedies. The WQMP must describe the network of monitoring wells, the frequency of monitoring, and the constituents to be monitored.

On April 6, 2023, the Watermaster adopted its GWMP³⁵ to satisfy the Judgment requirement to develop the WQMP. The GWMP addresses both groundwater-level and groundwater-quality monitoring to capitalize on grant funding awarded through the DWR SGM grant program administered by the DWR. The GWMP describes the monitoring objectives, the current monitoring network, frequency of monitoring, constituents monitored, database management, recommended locations for additional groundwater-level and groundwater-quality monitoring, recommendations and methods for expanding/improving the monitoring programs, how monitoring data will be reported, and the process for updating the GWMP.

A key element of the GWMP methods to expand the monitoring program is a public outreach and engagement effort whereby the Watermaster is seeking collaboration from the Borrego Springs community to help identify well owners that would be willing to allow the Watermaster to monitor their well(s). The Watermaster prepared public outreach and engagement materials and conducted outreach with members of the public in Borrego Springs to solicit interest from private well owners in participating in the monitoring program and/or to identify wells that may be a good candidate for expanding the groundwater monitoring network. The outreach materials include:

- Letter requesting participation in the GWMP
- Potential participant information form
- Map of the current groundwater monitoring network
- Frequently Asked Questions about participating in the GWMP
- Frequently Asked Questions about the requirements and process for abandoning a well

³⁵ Available on the Watermaster's website at: <https://borregospringswatermaster.com/wp-content/uploads/2023/04/R-BSW-Groundwater-Monitoring-Program-FINAL-20230411.pdf>

These outreach materials are published on the [Watermaster's website](#). Wells identified by the public are then canvassed during a regularly scheduled semi-annual monitoring event. During the well canvass, the well is assessed for the following: site access, current condition of the well, any repair(s) or rehabilitation required to convert the well to a monitoring well, if a transducer can be placed in the well, or if a groundwater quality sample can be collected. Based on the well canvass, the Watermaster will recommend whether the well is a suitable candidate to add to the groundwater quality and/or groundwater level monitoring network and develop an action plan to convert the well to a monitoring well.

3.1.2.2 Efforts to Expand and Maintain the Groundwater Monitoring Program

In evaluating how to expand/improve the monitoring programs, the GWMP considered the data gaps identified in the GMP and identified a comprehensive list of areas where the monitoring network could be improved to better understand groundwater elevations and quality. Expanding the groundwater monitoring networks improves the understanding of the hydrogeology of the Basin by collecting additional information on seasonal long-term trends in groundwater quality, the effects of recharge and GMP implementation on groundwater quality, and the depth distribution of groundwater quality, groundwater elevation, groundwater-flow directions, and hydraulic gradients in the NMA and CMA. The GWMP identified a total of 16 locations where the groundwater-level monitoring network could be expanded³⁶ and 20 locations where the groundwater-quality monitoring network could be expanded.³⁷ The locations of recommended additional groundwater-level and groundwater-quality monitoring are shown on Figure 2.

To implement the recommended improvements to the groundwater monitoring network, the GWMP identified three primary methods to add a well to the monitoring network, which include: (i) using an existing pumping well, (ii) converting an abandoned or inactive well into a monitoring, and (iii) constructing a new monitoring well. Expanding the groundwater monitoring network during the first two years of implementation of the GWMP is focused on (i) using existing wells in the Basin and (ii) converting inactive/abandoned wells into monitoring wells.

Since the adoption of the GWMP, the Watermaster made efforts to expand the groundwater monitoring networks with an emphasis on identifying existing active and inactive/abandoned wells in the Basin that could be incorporated into the monitoring network. Efforts included:

- Engaged with the public and Basin pumpers to solicit interest from well owners in participating in the monitoring program and/or to identify wells that may be a good candidate for expanding the monitoring program.
- Performed a desktop assessment of all candidate wells that could be added to the monitoring networks to evaluate which wells are most appropriate to add. In total, 67 candidate wells were identified and evaluated.
- Collected well construction information on candidate wells and added the information to the Watermaster's database.
- Performed site visits to candidate wells to evaluate the current condition of the wells. In total, 43 wells were visited during four site visits conducted in WY 2023 and WY 2024.
- Executed entry and data confidentiality agreements with well owners.

³⁶ See Figure 1 and Table 2 in the GWMP.

³⁷ See Figure 2 and Table 4 in the GWMP.

- For wells that did not require additional work (i.e., well conversion or securing activities), these wells were added to the groundwater level and groundwater quality monitoring program.
- Identified wells that required additional work (i.e., well conversion or securing activities). This included five inactive wells that could be added to the monitoring network and ten wells in the Watermaster’s existing monitoring network that required rehabilitation or proper securing.

In WY 2025, Watermaster continued efforts to expand and maintain the groundwater monitoring network and focused on performing the necessary field work to (i) convert the five inactive wells into monitoring wells through well conversion and securing activities, and (ii) properly secure nine of the ten wells³⁸ in the existing monitoring program to protect public safety and enhance the longevity of the wells for monitoring. In WY 2025, Watermaster used DWR SGM grant funding to perform maintenance and conversion activities at inactive or improperly abandoned wells. Watermaster identified and hired a contractor (Well Tec Services) to secure and convert the inactive/abandoned and existing monitoring wells.

A total of 15 wells were secured, rehabilitated, and/or converted, as shown on Figure 2. Of these 15 wells, five wells are new to the Watermaster’s Monitoring Program. The work performed in WY 2025 included:

- Performed site visits during the Fall 2024 Semi-Annual Monitoring event. The site visits were performed by Watermaster and Well Tec staff.
- Prepared site-specific well conversion workplans to rehabilitate, secure, and/or convert abandoned wells into monitoring wells after conducting field visits to the wells.
- Performed field work to secure, rehabilitate, and/or convert wells. The field work was performed from January 20, 2025 through February 18, 2025 and included:
 - Performed maintenance activities and properly secured five inactive wells to convert them to groundwater-level monitoring wells. Well conversion activities were well-specific, but generally included: removing downhole equipment, video logging the wells to document the well screen intervals and conditions, well rehabilitation, installing new well head access points to allow for water-level monitoring and/or low-flow water-quality sampling, and/or installing transducers to measure groundwater-level. These wells were added to the Groundwater-Level Monitoring Network following completion of field work.
 - Properly secured nine inactive wells in the Watermaster’s existing monitoring program due to public safety concerns (as shown on Figure 2). Well securing activities were well-specific, but generally included: installing locking well caps, improving the well head, installing a concrete pad around the well head, and/or installing bollards to physically protect the well.
 - Video logged one well in the Watermaster’s existing monitoring program, Airport 2, and recommended proper destruction based on the condition of the well, in which the well casing had collapsed and there is a total obstruction at approximately 50 ft-bgs.
- Prepared well conversion reports for each well.

³⁸ The Airport 2 well was not secured. A video log was performed on the Airport 2 well, which revealed that the well casing collapsed and the well was beyond rehabilitation. Therefore, instead of rehabilitating this well, it was recommended to be destroyed.

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- Performed well inspections of the wells secured, rehabilitated, and converted by Well Tec to ensure compliance with DWR monitoring well standards.
- Issued a Notice of Completion to Well Tec on March 28, 2025 informing them that the work was completed satisfactorily.

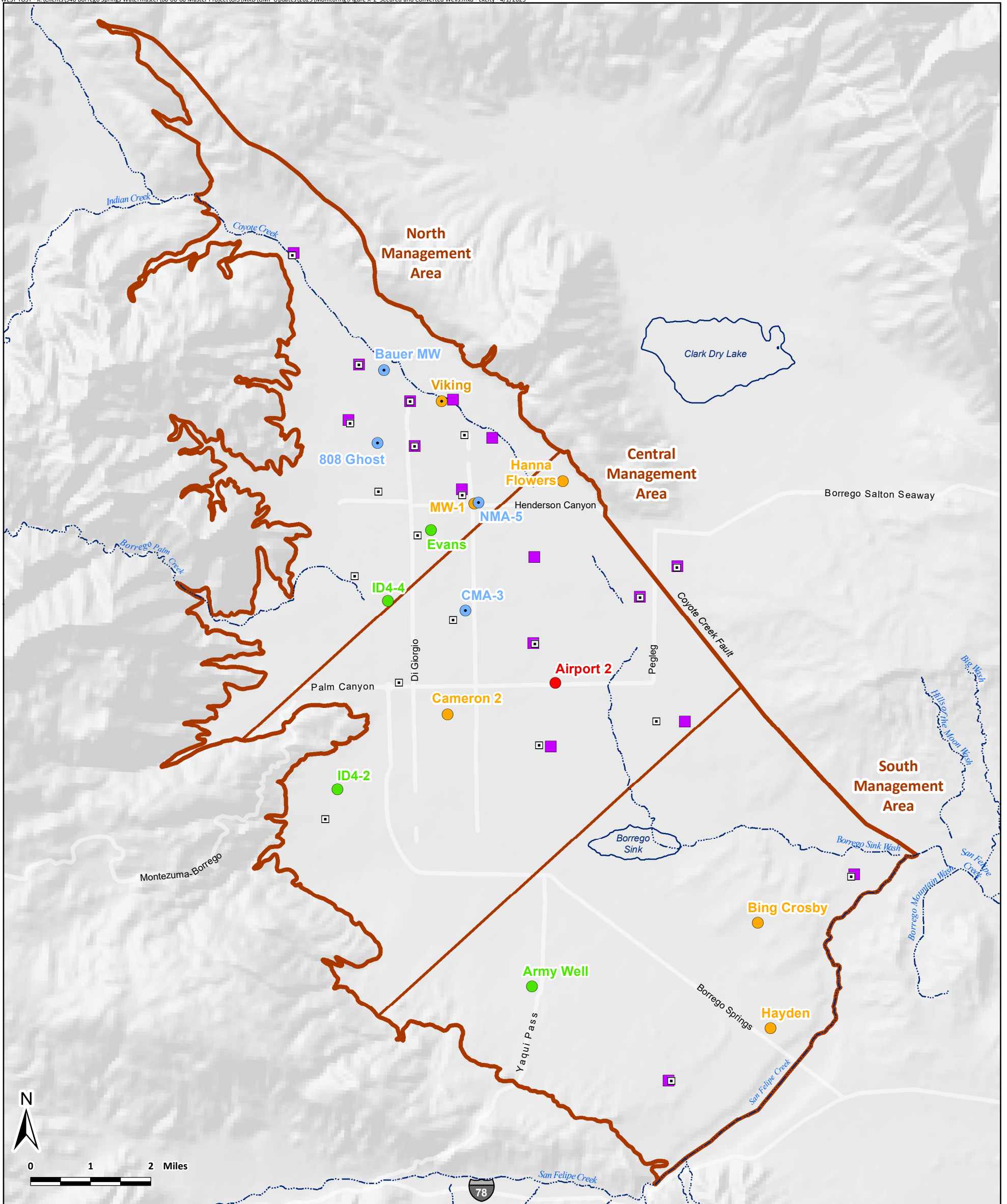
Additionally, in WY 2025 the Watermaster added five existing monitoring wells from Borrego Landfill to the groundwater-level and groundwater quality monitoring programs. These wells are not monitored by the Watermaster, but groundwater level and groundwater quality data is publicly available on GeoTracker. Watermaster downloaded the historical groundwater-level and groundwater-quality data from 2004 to 2025 for these wells and processed and uploaded the data to the Watermaster's data management system. The data will be downloaded annually going forward.

Through the multi-year effort to expand the monitoring network, a total 21 new wells had been added to the monitoring network. The effort to expand groundwater monitoring network was documented in a TM submitted to the DWR and is available on the Watermaster's website.³⁹ In summary, the effort led to adding:

- 18 wells identified and added through the efforts described above and funded using SGM funding:
 - 13 private wells
 - Five monitoring wells at the Borrego Landfill
- One new well, ID5-15, recently constructed by BWD (an existing participant in the monitoring program). This well is monitored by BWD and data is shared with Watermaster staff semi-annually.
- A multi-depth completion well (two wells, MW-6S and MW-6D) constructed using DWR Technical Support Services (TSS) funding. These wells are monitored by DWR and the data is shared semi-annually with Watermaster staff.

For the remaining locations where additional monitoring is recommended, including seven locations in the Groundwater-Level Monitoring Network and nine locations in the Groundwater-Quality Monitoring Network, the Watermaster will continue to solicit public interest and identify existing wells in the Basin that could be used as monitoring wells. As needed, Watermaster will consider the construction of new monitoring wells in areas where there are no other options. Additional grant funding will be needed for new monitoring well conversions or construction.

³⁹ Available on the Watermaster's website at: <https://borregospringswatermaster.com/wp-content/uploads/2025/04/C7-c-Conversion-of-Abandoned-Wells-TM.pdf>



Type of Inactive/Abandoned Well Converted and/or Secured

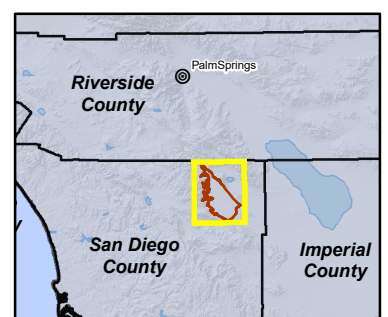
- New well added to Monitoring Program
- Existing well in Monitoring Program

Type of Conversion and/or Securing Activity Performed

- Secure only
- Video Log, Rehab, and Secure
- Video Log, Rehab, Secure and Convert to a Monitoring Well
- Video Log, destruction recommended

Other Features

- Area of Recommended Additional Water-Level Monitoring
- Area of Recommended Additional Water-Quality Monitoring
- ▭ Borrego Springs Subbasin with Management Area Divisions



Borrego Springs Watermaster

3.1.2.3 Groundwater Monitoring Network as of WY 2025

Wells included in the groundwater monitoring network were incorporated from previous monitoring networks established by the BWD, the County, DWR, and United States Geological Survey (USGS); and from recent public outreach efforts. Wells are selected for monitoring based on a combination of factors, including geographic location, screen interval relative to the three principal aquifers⁴⁰, accessibility, well condition, and continuity of historical data. Some of the wells in the monitoring network are strictly observation wells (no pumping), while others are used to pump groundwater for municipal, recreation (e.g., golf courses), and other purposes.

The wells included in the current groundwater level and groundwater quality monitoring program are listed in Table 8 and the locations are shown on Figure 3. Table 8 identifies the management area, local well name, State Well ID, well use, type of monitoring performed, and, if applicable, the reason(s) why a sample or measurement was not collected during the WY 2025 events (fall 2024 and spring 2025).

As shown in Table 8, the monitoring network currently consists of 71 groundwater wells, including the 16 Representative Monitoring Wells identified in the 2020 GMP. Of the 71 wells currently in the network:

- 64 are monitored for groundwater levels. Of these 64 wells:
 - 35 wells are measured using manual methods. Manual measurements are collected semi-annually in the spring and fall of each year.
 - 29 wells are measured at a high frequency interval (15 minutes to 1 hour) using a pressure transducer with an integrated data logger. Manual groundwater level measurements are also collected semi-annually.
- 43 are monitored for groundwater quality. Of these 43 wells:
 - 10 wells are wells used for drinking water.
 - 19 wells are non-potable wells used for agricultural, recreation, irrigation, and other non-potable uses.
 - 14 wells are dedicated monitoring wells.

There were more wells in the groundwater monitoring network in WY 2025, compared to WY 2024:

- 13 wells were added to the groundwater level monitoring network
- 12 wells were added to the groundwater quality monitoring network.

During WY 2025, groundwater levels were measured at 63 of the 64 wells in the network (see Table 8). Notable outcomes include:

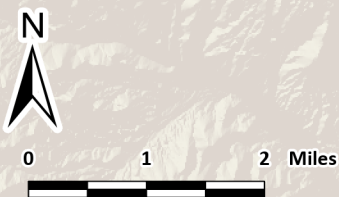
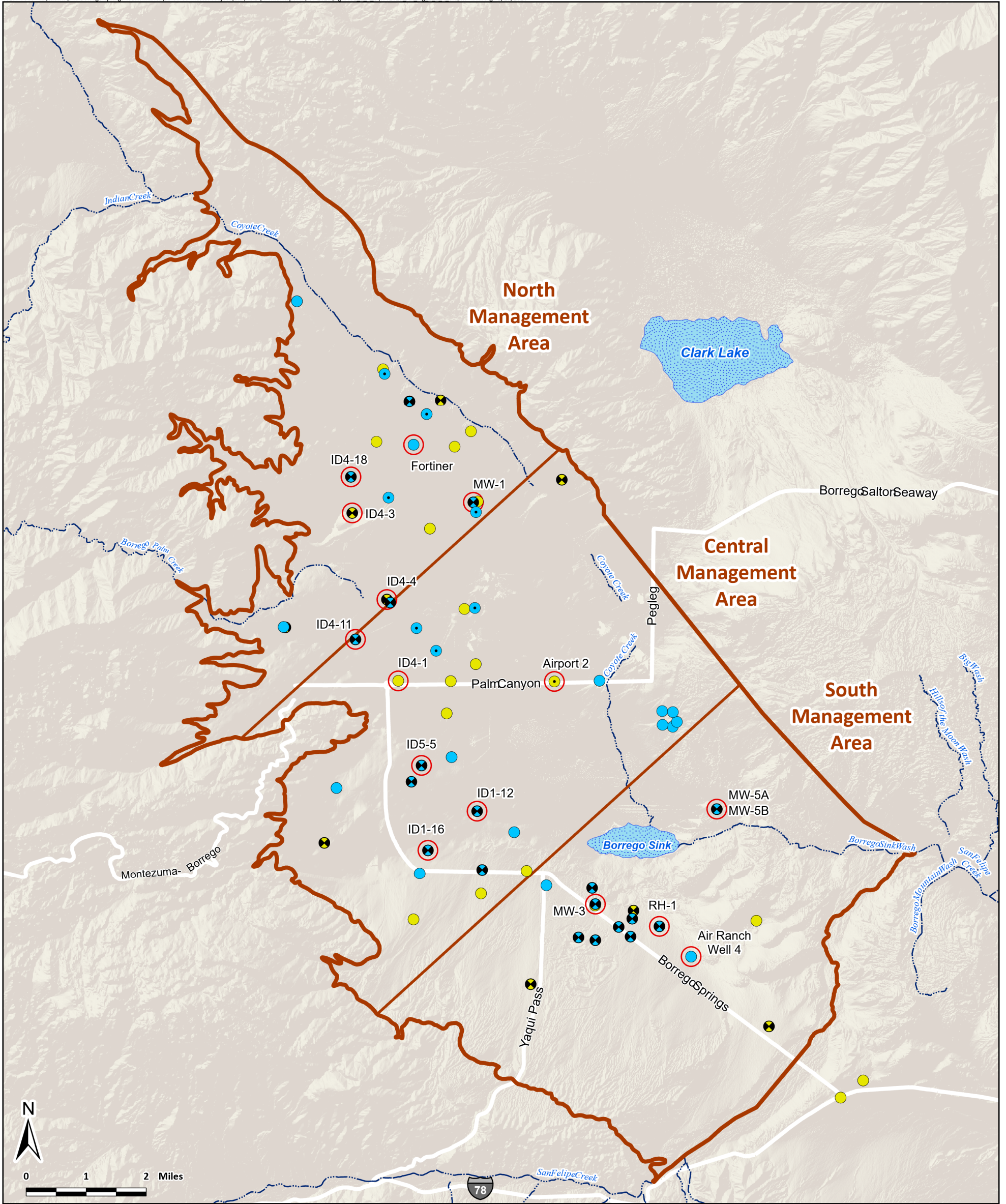
- SGM funding used to expand the monitoring network and/or convert inactive/abandoned wells allowed Watermaster Staff to officially report groundwater level data from 11 wells for the first time.
- Transducer data was downloaded for the first time at three wells: MW-6S, MW-6D, and ID5-15.
- Four new transducers were installed to replace failing units at RH-1, RH-2, RH-5, and RH-6.

⁴⁰ The upper, middle, and lower aquifer are the three principal aquifers in the Basin.

- Six new transducers and seven new cables were installed in wells that previously have not been monitored with high-frequency methods at the following locations: ID4-3, ID4-4, ID4-10, Viking Well, Army Well, Hayden, and Hanna Flowers (cable only). The new equipment was funded by the DWR SGM grant.
- One well, Airport 2, was not able to be monitored in fall 2024 or spring 2025 due to the well casing collapsing. A groundwater level measurement has not been able to be taken from this well since spring 2023. As part of the effort to rehabilitate this well, a video log taken of the Airport 2 well revealed that the well is in poor condition with collapsed well casing and complete obstruction. Rehabilitation of this well would be prohibitively expensive and time-consuming; thus, staff recommended that this well be properly destroyed by the owner. Loss of this well has not created a data gap and a revised set of Representative Monitoring Wells is being developed as part of the 5-Year Assessment.

During WY 2025, groundwater quality samples were collected at all 43 wells in the network (see Table 8). Notable outcomes include:

- SGM funding used to expand the monitoring network and/or convert inactive/abandoned wells allowed Watermaster Staff to collect and officially report groundwater quality data from eight wells for the first time.
- One well, Terry well, was removed from the groundwater quality network in spring 2025 due to access issues. A groundwater quality sample has not been able to be taken from this well since spring 2024. While this well was removed from the groundwater quality network, it remains in the groundwater level network.



Groundwater Monitoring Network

○ Representative Monitoring Well

Wells Monitored for Groundwater Level
(symbol style)

- Manual Water-level Data
- ⊗ Transducer Water-level Data
- No Water-level Data

Wells Monitored for Groundwater Quality
(symbol color)

- Sampled for Water Quality
- Not Sampled for Water Quality

Other Features

▭ Borrego Springs Subbasin with Management Area Divisions

Surface Water Features

- Stream Channel
- Dry Lake



Figure 3

Groundwater Level and Quality Monitoring Network

Borrego Springs Watermaster
Borrego Springs Subbasin
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Table 8. Groundwater Level and Quality Monitoring Network and Wells Monitored in Water Year 2025

Local Well Name	State Well ID	Well Use	Groundwater Monitoring Network						Comments
			Water Level (WL)			Water Quality (WQ)			
			Method if in program ^(a)	Fall 2024	Spring 2025	Well in program?	Fall 2024	Spring 2025	
North Management Area									
ID4-18*	010S006E18J001S	Public Supply	transducer	x	x	yes	x	x	
ID4-3*	010S006E18R001S	Observation	transducer	x	x				New transducer and cable installed in Spring 2025.
ID4-4*	010S006E29K002S	Observation	transducer	x	x				Well secured and rehabbed as part of the abandoned-inactive well program. New transducer and cable installed in Spring 2025.
ID4-9	010S006E29K003S	Public Supply	transducer	x	x	yes	x	x	
MW-1*	010S006E21A002S	Observation	transducer	x	x	yes	x	x	Well secured as part of the abandoned-inactive well program.
Evans	010S006E21E001S	Observation	manual	x	x				Well secured as part of the abandoned-inactive well program.
Horse Camp	009S006E31E003S	Other	manual	x	x	yes	x	x	
Fortiner*	010S006E09N001S	Other	manual	x	x	yes		x	Unable to sample for GWQ in Fall 2024 due to the well pump being non-operational.
Auxiliary Well 3	010S005E25R002S	Other	transducer	x	x				
Auxiliary Well 2	010S005E25R001S	Other	manual	x	x	yes	x	x	
T2 Farms	010S006E09C001S	Irrigation				yes	x	x	
MW-6S	010S006E08A003S	Observation	transducer	x	x	yes	x	x	Transducer data downloaded for the first time in Spring 2025.
MW-6D	010S006E08A002S	Observation	transducer	x	x	yes	x	x	Transducer data downloaded for the first time in Spring 2025.
Viking Well	010S006E04Q001S	Observation	transducer		x				New well added to WL network as part of the abandoned-inactive well program. Well was secured and a new transducer and cable were installed in Spring 2025.
Bauer Monitoring Well		Observation	manual		x				New well added to WL network as part of the abandoned-inactive well program. Well was secured, rehabbed, and converted into a monitoring well in Spring 2025.
808 Ghost		Observation	manual		x				New well added to WL network as part of the abandoned-inactive well program. Well was secured, rehabbed, and converted into a monitoring well in Spring 2025.
NMA-1	Private ^(b)	Irrigation				yes	x	x	
NMA-2	Private ^(b)	Domestic	manual	x	x				
NMA-3	Private ^(b)	Observation	manual	x	x				
NMA-5	Private ^(b)	Observation	manual		x				New well added to WL network as part of the abandoned-inactive well program. Well was secured and converted in Spring 2025.
NMA-6	Private ^(b)	Irrigation				yes	x	x	
NMA-7	Private ^(b)	Irrigation				yes	x	x	Well added to WQ network and WQ sample collected for the first time in Fall 2024.
Central Management Area									
Anzio/Yaqui Pass	011S006E22E001S	Observation	manual	x	x				
BSR Well 6	011S006E09B002S	Irrigation	manual	x	x	yes	x	x	
Cameron 2	011S006E04F001S	Observation	manual	x	x				Well secured as part of the abandoned-inactive well program.
County Yard	011S006E15G001S	Industrial	manual	x	x	yes	x	x	
ID1-10	011S006E22D001S	Public Supply	transducer	x	x	yes	x	x	
ID1-12*	011S006E16A002S	Public Supply	transducer	x	x	yes	x	x	
ID1-16*	011S006E16N001S	Public Supply	transducer	x	x	yes	x	x	
ID4-1*	010S006E32R001S	Observation	manual	x	x				
ID4-10	011S006E18L001S	Observation	transducer	x	x				New transducer and cable installed in Spring 2025.
ID4-11*	010S006E32D001S	Public Supply	transducer	x	x	yes	x	x	
ID4-2	011S006E07K003S	Observation	manual	x	x	yes		x	Well added to the WQ network after being secured and rehabbed as part of the abandoned-inactive well program. First WQ sample collected in Spring 2025.
ID4-5	010S006E33Q001S	Observation	manual	x	x				
ID5-5*	011S006E09E001S	Public Supply	transducer	x	x	yes	x	x	
ID5-15	011S006E08	Public Supply	transducer		x	yes	x	x	Well added to the WQ network in Fall 2024 and added to WL network in Spring 2025. Transducer data downloaded for the first time in Spring 2025.
MW-4	010S006E35Q001S	Observation	manual	x	x	yes	x	x	
Paddock	011S006E22B001S	Observation	manual	x	x				
Palleson	010S006E33J001S	Observation	manual	x	x				
Wilcox	011S006E20A001S	Public Supply	manual	x	x	yes	x	x	
Hanna (Flowers)	010S006E14G001S	Observation	transducer	x	x				Well secured as part of the abandoned-inactive well program. New cable installed in Spring 2025.
Terry Well	011S006E20R001S	Irrigation	manual	x	x				Unable to sample for WQ since Spring 2024 because of access issues (owner unable to activate pump). Well was removed from WQ program in Spring 2025 until new well owner is contacted.
Airport 2*	010S006E35N001S	Observation	destroyed						Unable to measure WL since Spring 2023 due to collapsed well casing. Well will be removed from WL network upon finding a replacement Representative Monitoring Well.
BSMW-1R ^(c)		Observation	manual		x	yes		x	New well added to WL and WQ networks in Spring 2025.
BSMW-2R ^(c)		Observation	manual		x	yes		x	New well added to WL and WQ networks in Spring 2025.
BSMW-3R ^(c)		Observation	manual		x	yes		x	New well added to WL and WQ networks in Spring 2025.
BSMW-5R ^(c)		Observation	manual		x	yes		x	New well added to WL and WQ networks in Spring 2025.
BSMW-6 ^(c)		Observation	manual		x	yes		x	New well added to WL and WQ networks in Spring 2025.
CMA-2	Private ^(b)	Irrigation				yes	x	x	
CMA-3	Private ^(b)	Observation	manual		x				New well added to WL network as part of the abandoned-inactive well program. Well was secured and converted in Spring 2025.
CMA-4	Private ^(b)	Recreation				yes	x	x	
CMA-5	Private ^(b)	Recreation				yes	x	x	
South Management Area									
Air Ranch Well 4*	011S007E30L001S	Public Supply	manual	x	x	yes	x	x	
Army Well	011S006E34A001S	Observation	transducer	x	x				Well secured and rehabbed as part of the abandoned-inactive well program. New transducer and cable installed in Spring 2025.
Hayden (32Q1)	011S007E32Q001S	Observation	transducer	x	x				Well secured as part of the abandoned-inactive well program. New transducer and cable installed in Spring 2025.
ID1-8	011S006E23J001S	Public Supply	manual	x	x				
JC Well	011S006E24Q001S	Observation	transducer	x	x				
La Casa	011S006E23E001S	Irrigation	manual	x	x	yes	x	x	
MW-3*	011S006E23J002S	Observation	transducer	x	x	yes	x	x	
MW-5A*	011S007E07R001S	Observation	transducer	x	x	yes	x	x	
MW-5B*	011S007E07R002S	Observation	manual	x	x	yes	x	x	
RH-1 (ID1-1)*	011S006E25A001S	Recreation	transducer	x	x	yes	x	x	Transducer replaced in Fall 2024.
RH-2 (ID1-2)	011S006E25C001S	Recreation	transducer	x	x	yes	x	x	Transducer replaced in Fall 2024.
RH-3	011S006E25C002S	Recreation	transducer	x	x	yes	x	x	
RH-4	011S006E24Q002S	Recreation	transducer	x	x	yes	x		Unable to sample for WQ in Spring 2025 due to the non-operational well pump.
RH-5	011S006E26B001S	Recreation	transducer	x	x	yes	x	x	Transducer replaced in Spring 2025.
RH-6	011S006E26H001S	Recreation	transducer	x	x	yes	x	x	Transducer replaced in Fall 2024.
WWTP	011S006E23H001S	Observation	transducer	x	x	yes	x	x	
Bing Crosby Well	011S007E20P001S	Observation	manual	x	x				Well secured as part of the abandoned-inactive well program.
Outside Borrego Springs Subbasin									
State Well	012S007E03L001S	Observation	manual	x	x				
Nel Well	012S007E04R001S	Observation	manual	x	x				

Wells not included in the groundwater level or groundwater quality monitoring program are greyed out.

*Representative Monitoring Well with defined Minimum Thresholds and Measurable Objectives, as identified in Table 3-4 and Table 3-5 of the GMP.

(a) Wells denoted with "transducer" have a pressure transducer installed that continuously records water level measurements on a high frequency interval (15-minutes to 1 hour).

(b) Private wells with data confidentiality agreements are denoted by aliases "NMA-#" or "CMA-#" based on their relative location in the Management Area.

(c) The most recent data for WL and WQ at the Borrego Landfill, as reported on GeoTracker (https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=L10003017008), were measured in June 2025.

3.2 Technical Advisory Committee

Section IV.G of the Judgment and Article III of the Rules & Regulations provides for the formation of the Watermaster TAC. The Judgment defines the TAC as (Section I.A.58):

The advisory body established pursuant to Section IV.G(1) of this Judgment to study technical aspects of the Basin and to issue recommendations to Watermaster based on such technical study for the purpose of achieving Sustainable Groundwater Management in the Basin in an effective and efficient manner, consistent with the rights and obligations of the Parties established by this Judgment.

Section IV.E.7 calls for the TAC to meet at least semi-annually to review Watermaster activities pursuant to the Judgment. The types of activities within the subject matter expertise of the TAC on which recommendations are to be made to the Watermaster pursuant to the Judgment are summarized as follows.

Determination of Sustainable Yield (Section II.E; Section III.F). The Judgment describes the detailed process for redetermining the Sustainable Yield and the implementation of the Rampdown through 2040 and provides a schedule for the TAC to develop and agree upon a scope of work to determine the Sustainable Yield. The TAC provides the Watermaster with its recommendations on redetermining the Sustainable Yield. The Judgment requires Sustainable Yield, and any associated changes to the Rampdown, to occur by January 1, 2025; January 1, 2030; and January 1, 2035.

Evaluation of Carryover (Section III.B). The Carryover provision for unused annual allocations of pumping rights must be reevaluated by January 1, 2025, with consultation from the TAC.

BPA transfers (Section III.I.5). The Watermaster will seek input from the TAC if it seeks to restrict Permanent Transfers and Leases to specific areas of the Basin. This is an as-needed duty of the TAC and performed only upon direction from the Watermaster Board.

Selection of Watermaster staff (Section IV.C). This is an as-needed duty of the TAC and performed only upon direction from the Watermaster Board.

Groundwater Quality Monitoring Plan (Section VI.B). A Groundwater Quality Monitoring Plan must be developed with TAC input within 24 months of entry of the Judgment (this activity was completed in March 2023). The TAC will also review the Watermaster's evaluation of water-quality data and any findings of impacts on beneficial uses and associated remedies.

3.2.1 TAC Responsibilities

Section IV.G.2 of the Judgment defines the TAC's duties and responsibilities to include making recommendations based on best available science and data collected regarding the water budget of the Basin and the avoidance of Undesirable Results, including without limitation, information generated from model runs of the BVHM. With regards to making recommendations, Section IV.G.1 of the Judgment provides that the TAC will endeavor to decide all matters by consensus. In WY 2023, the Board adopted

guidelines for the TAC process ([Resolution 23-01](#)).⁴¹ The guidelines were adopted to clarify the role of the Technical Consultant in facilitating the TAC and the expectations of the TAC participants.

For issues discussed during TAC meetings that require a formal TAC recommendation to the Watermaster Board, a TAC recommendation report is produced. The Technical Consultant summarizes the TAC recommendations based on the discussion at the TAC meeting and coordinates with the TAC via email with the goal of obtaining TAC consensus. A report is prepared describing the TAC recommendation and documenting if consensus has been achieved amongst the TAC. If consensus cannot be achieved, the TAC recommendation report to the Watermaster describes the differences in opinion and arguments for each opinion, as required in Section IV.G of the Judgment and as described in Resolution 23-01. A draft of the report is circulated for comment and input by all TAC members prior to submission of the report to the Watermaster to ensure the recommendation accurately reflects the views of each TAC member.

3.2.2 TAC Membership

Under Section IV.G.1 of the Judgment, TAC membership is open to an expert hired by any Party holding BPA or the County. The expert must be a California licensed hydrogeologist, California licensed engineer, professional hydrogeological modeler, professional groundwater statistician, or other California licensed member of a recognized professional discipline approved by the Watermaster. No new members were added to the TAC in WY 2025. Table 9 lists the members of the TAC as of the end of the reporting period on September 30, 2025. Detailed information about each TAC member’s qualifications is provided on the Watermaster’s [website](#).⁴²

Table 9. Technical Advisory Committee Membership in Water Year 2025	
Representing	TAC Member
Borrego Water District	Trey Driscoll, PG, CHG - Principal Hydrogeologist, Intera
T2 Borrego, LLC	Tom Watson, PG – Principal Geologist, Aquilogic
Parties who are members of the Agricultural Alliance for Water and Resource Education (“AAWARE”)	Bob Wagner, PE – Principal Water Resources Engineer, Wagner & Bonsignore
County of San Diego	Jim Bennett, PG, CHG – Water Resources Manager, County of San Diego
Roadrunner Club	John Peterson, PG, CHG - Retired
Borrego Springs Community	Dr. Russell Detwiler – University of California, Irvine

3.2.3 Reporting Period Meetings and Recommendations

The meetings of the TAC are facilitated by Watermaster’s Technical Consultant. TAC meetings are held virtually and are open to the public. The public is afforded the opportunity to address the TAC at the beginning and end of the meetings, and, if requested by the TAC, during TAC discussion.

In WY 2024, the Watermaster Board authorized the Technical Consultant to call “Ad-Hoc” TAC meetings to discuss the 2025 redetermination of the Sustainable Yield. The key differences between a regular and

⁴¹ <https://borregospringswatermaster.com/wp-content/uploads/2023/03/Resolution-23-01-Guidelines-for-TAC-Process-Executed.pdf>

⁴² <https://borregospringswatermaster.com/technical-advisory-committee-meetings/>

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Ad-Hoc meeting are documented in the [staff technical memorandum \(TM\) to the Board](#)⁴³ to authorize Ad-Hoc TAC meetings (approved during the February 8, 2024 Board meeting) and summarized below:

- An Ad-Hoc TAC meeting is focused exclusively on efforts to redetermine the Sustainable Yield.
- Up to 10 minutes will be reserved for public comments at the start of the meeting. No public questions or comments will be accepted during the working portion of the meeting. Additional public comments will be accepted via email to the Technical Consultant and circulated to the TAC for consideration at a future, formal TAC meeting.
- Formal meeting minutes will not be generated. Key decisions will be documented and circulated in email form in lieu of meeting minutes.

Table 10 lists the TAC meeting dates, agenda topics, and summary of the recommendations to the Board for the reporting period. The TAC meeting materials, including meeting presentations and recordings, are available on the Watermaster’s [website](#).⁴⁴

Meeting Date	Meeting Type	Agenda Topics
October 16, 2024	Ad-Hoc	<ul style="list-style-type: none"> • Draft TM for Task 4 – <i>Model Recalibration</i> • TAC Recommendation Report on the 2025 Redetermination of the Sustainable Yield • Scope of Work to support the 2030 Redetermination of the Sustainable Yield
November 19, 2024	Regular	<ul style="list-style-type: none"> • Board and public comments on the draft Redetermination of the 2025 Sustainable Yield • Scope of Work to support the 2030 Redetermination of the Sustainable Yield • Analysis of Carryover Rules
December 9, 2024	Regular	<ul style="list-style-type: none"> • Board comments on the draft Redetermination of the 2025 Sustainable Yield • Scope of Work to support the 2030 Redetermination of the Sustainable Yield • Analysis of Carryover Rules • Storage change calculation for spring 2023 to spring 2024 • Pumping projections to support the GMP Assessment Report
February 25, 2025	Regular	<ul style="list-style-type: none"> • Pumping projections for simulation with the BVHM • Discussion of the 5-Year GMP Assessment Report • Status update on the effort to expand the Groundwater Monitoring Network and convert inactive/abandoned wells to monitoring wells
March 18, 2025	Ad-Hoc	<ul style="list-style-type: none"> • Evaluation of the 2025 Sustainable Yield
May 1, 2025	Regular	<ul style="list-style-type: none"> • Use of the 2022 BVHM to evaluate future sustainability • Scope of Work and budget to review and use the GDE Study Report

⁴³ https://borregospringswatermaster.com/wp-content/uploads/2024/02/2024028_Board-Agenda-Package-1.pdf

⁴⁴ <https://borregospringswatermaster.com/technical-advisory-committee-meetings/>

Table 10. Technical Advisory Committee Meetings and Topics During the Reporting Period		
Meeting Date	Meeting Type	Agenda Topics
August 7, 2025	Regular	<ul style="list-style-type: none"> • BVHM Simulation Results: Northward shift of future pumping • Updating SMC for groundwater levels and storage • Review of the UCI GDE Study as “Best Available Science”
September 22, 2025	Regular	<ul style="list-style-type: none"> • Discuss DWR RCAs regarding SMC for: (i) groundwater quality, and (ii) land subsidence • TAC assignment to evaluate/rank proposals for peer reviewer of GDE Study Report • Review of pumping projections to simulate using the BVHM

For issues discussed during TAC meetings that require a formal TAC recommendation to the Watermaster Board, a TAC recommendation report is produced. The Technical Consultant summarizes the TAC recommendations based on the discussion at the TAC meeting and coordinates with the TAC via email with the goal of obtaining TAC consensus. A report is prepared describing the TAC recommendation and documenting if consensus has been achieved amongst the TAC. If consensus cannot be achieved, the TAC recommendation report to the Watermaster describes the differences in opinion and arguments for each opinion, as required in Section IV.G of the Judgment. Table 11 summarizes the two formal recommendations made by the TAC to the Board during WY 2025. The official TAC recommendation reports are available on the Watermaster’s website.⁴⁵

⁴⁵ Available on the Watermaster’s website at: <https://borregospringswatermaster.com/technical-advisory-committee-meetings/>

Table 11. TAC Recommendations to the Board During the Reporting Period

Recommendation(s) to the Board	TAC Committee Member Party and Representative						Board Action
	AAWARE <i>Bob Wagner</i>	Borrego Springs Community <i>Russell Detwiler</i>	BWD <i>Trey Driscoll</i>	County of San Diego <i>Jim Bennett</i>	T2 Borrego - Rams Hill <i>Tom Watson</i>	Roadrunner Club <i>John Peterson</i>	
Redetermination of the 2025 Sustainable Yield (October 29, 2024)							
<i>Recommendations:</i> ¹							
The Calibrated BVHM is a good simulator of the hydrology of the Basin and can confidently be used to redetermine the 2025 Sustainable Yield.	X	X	X	X	X	X	The Board approved a 2025 Sustainable Yield of 7,952 afy.
The 2025 Sustainable Yield should be set at 7,952 afy.	X			X	X		
The 2025 Sustainable Yield should be set at 7,900 afy.			X			X	
The 2025 Sustainable Yield should be set at 7,800 afy.		X					
Scope-of-Work to Redetermine the 2030 Sustainable Yield - WY 2026 - 2029 (December 12, 2024)							
<i>Recommendations:</i> ³							
The Minimum Required Scope-of-Work should not be performed. Instead, Additional/Optional Tasks should be performed.	X	X	X	X	X	X	The Board approved Additional/Optional Task 2 - <i>GDE Study Results</i> and Task 3 - <i>Monitoring Program Data</i> as the scope of work to support the redetermination of the 2030 Sustainable Yield.
The Scope-of-Work should include performing the following Additional/Optional Tasks:							
Task 1 - AEM Results		X <i>(If grant funded)</i>	X	X	X	X <i>(If grant funded)</i>	
Task 2 - GDE Study Results	X	X	X	X	X	X	
Task 3 - Monitoring Program Data	X	X	X	X	X	X	
Task 4 - Estimates of Natural Inflows		X <i>(If grant funded)</i>	X				
Task 5 - Other Model Platforms	X <i>(If grant funded)</i>	X <i>(If grant funded)</i>			X	X <i>(If grant funded)</i>	
<p>(1) The reasons for each TAC members' recommendation regarding the redetermination of the 2025 Sustainable Yield are documented in the TAC Recommendation Report available on the Watermaster's website at: https://borregospringswatermaster.com/wp-content/uploads/2025/10/TAC-Recommendation-Report_2025-SYR.pdf</p> <p>(2) The Board approved the redetermination of the 2025 Sustainable Yield of 7,952 afy with the requirement to report the range in estimates of the Sustainable Yield based on results from the uncertainty analysis and that another redetermination will occur in five years when communicating the new value.</p> <p>(3) More detail on each of the Additional/Optional Tasks and the reasons for each TAC members' recommendation regarding the scope of work to redetermine the 2030 Sustainable Yield are documented in the report available on the Watermaster's website at: https://borregospringswatermaster.com/wp-content/uploads/2025/10/TAC-Recommendation-Report_2030-Scope.pdf</p>							

3.3 Environmental Working Group

The Watermaster has established an EWG to advise the Watermaster on GDEs and any other matters approved by the Board. At its November 2020 meeting, the Board established a sub-committee consisting of Directors Jim Bennett and Mark Jorgensen to develop a recommendation on a process to establish the EWG. The subcommittee established a draft mission statement for the EWG. The final mission statement approved by the Board is:

The role of the Environmental Working Group (EWG) is to advise and further the mission of the Borrego Springs Watermaster to implement the Stipulated Judgment and comply with Sustainable Groundwater Management Act (SGMA) by focusing on the protection of human health and the environment. The activities of the EWG shall be approved by the Watermaster Board and will always include a nexus between environmental issues and the sustainable use of groundwater in the Borrego Springs Subbasin. Activities of the EWG could include, but are not limited to:

- *Environmental assessment, monitoring, and habitat restoration or enhancement associated with groundwater dependent ecosystems*
- *Management of fallowed lands and the potential for participating in biological mitigation projects*
- *Addressing improperly abandoned wells*
- *Management of non-native (invasive) species for water conservation purposes*
- *Air quality monitoring*
- *Pursuit of funding opportunities*

The EWG sub-committee also defined the proposed membership structure for the EWG, the desired qualifications of EWG members, and an application process to solicit membership. The EWG was to consist of a minimum of five members, including Director Jim Bennett (County of San Diego), Director Mark Jorgensen (Community Representative), and at least three at-large members selected by the Board. To best fulfill the mission, EWG members should have a background in science and one or more of the following specialties: desert ecosystems, GDE, hydrogeology, hydrology, and/or the local water resources and biology of the Borrego Springs Subbasin and surrounding area. Local knowledge of the Borrego Springs area and local residency are also preferred.

In December 2020, the Watermaster posted and noticed an EWG membership application to solicit membership and accepted applications through January 2021. The EWG applications were reviewed by the Board and members were appointed at the January 14, 2021 meeting. Table 12 lists the EWG members appointed by the Board and actively serving in WY 2025.

Table 12. Environmental Working Group Membership in WY 2025

Member and Affiliation	Member Experience
Mark Jorgensen Community Representative	Mr. Jorgensen is a retired Park Superintendent for Anza Borrego State Park and worked for California State Parks for 30 years. He sits on the Borrego Springs Watermaster Board representing the community of Borrego Springs.
Jim Bennett, PG, CHG County of San Diego	Mr. Bennett has 23 years of experience in hydrogeology. Mr. Bennett was the manager of the development of the GSP for the Borrego Springs Groundwater Subbasin. He sits on the Borrego Springs Watermaster Board, representing the County of San Diego.
Jim Dice Reserve Manager at the Steele/Burnand Anza-Borrego Desert Research Center	Mr. Dice has been Reserve Manager since the Steele/Burnand Anza-Borrego Desert Research Center opened in 2012. He retired in 2012 from California State Parks after 25 years of service with the State of California. He served as manager for San Diego State University’s Santa Margarita Ecological Reserve from 1987 to 1988 and Curator of the Desert Garden at Huntington Botanical Gardens in San Marino, California from 1981 to 1985.
Danny McCamish Senior Environmental Scientist for the Colorado Desert District of California State Parks	Mr. McCamish is a supervisory scientist overseeing Natural Resources Management for Colorado Desert District at California State Parks. He has 15 years of experience working in natural resources management and experience in climate change research.
John Peterson, PG, CHG Retired County Groundwater Geologist, California Professional Geologist and Certified Hydrogeologist	Mr. Peterson is a long-time resident of Borrego Springs with 40 years of experience in hydrogeology. He joined the County of San Diego as County Groundwater Geologist in 1981 and retired from the County in 2003. He also serves as Anza-Borrego Foundation Board Member.
Michael Wells, PhD Retired District Superintendent, Colorado Desert District, California Department of Parks and Recreation	Dr. Wells has over three decades of experience in natural resources management and a 34-year career with California State Parks. Dr. Wells has a PhD in physical geography from a joint program between San Diego State University and the University of California, Santa Barbara. He and his wife recently wrote a book on the natural history of the Anza-Borrego Region.

The meetings of the EWG are open to the public. The public is afforded the opportunity to address the EWG at the beginning and end of the meetings, and during EWG discussion if requested by the EWG. Table 13 lists the EWG meeting dates and agenda topics for the reporting period. The EWG meeting materials are available on the Watermaster’s [website](https://borregospringswatermaster.com/environmental-working-group/).⁴⁶

⁴⁶ <https://borregospringswatermaster.com/environmental-working-group/>

Table 13. Environmental Working Group Meetings and Topics in WY 2025

Meeting Date and Format	Agenda Topics
November 20, 2024 (In-Person)	Status update on the Biological Restoration of Fallowed Lands project: <ul style="list-style-type: none"> • Presentation on the study design, along with a field trip to visit project sites for Task 3 – <i>Fallowed Farmland Brush Fence Study</i> • Recommendations on updated following standards from Task 4 – <i>Farmland Following Rehabilitation Strategies</i>
January 23, 2025 (virtual)	Status update on the Biological Restoration of Fallowed Lands project: <ul style="list-style-type: none"> • EWG feedback on Task 4 Recommended Retired Farmland Rehabilitation Strategies Report • Results of <i>Task 5 – Farmland Following Prioritization</i> • Status update from UCI master’s students on Conservation and Restoration Science projects, involving Biological Restoration of Fallowed Lands projects developed for Task 3 – <i>Fallowed Farmland Brush Fence Study</i>
June 12, 2025 (virtual)	Final presentation on the Biological Restoration of Fallowed Lands project, results from the sand fences designed for Task 3 – <i>Fallowed Farmland Brush Fence Study</i> .

3.4 Redetermination of Sustainable Yield

3.4.1 Redetermination of the 2025 Sustainable Yield

In WY 2021, in accordance with the process defined in the Judgment, the Board approved a TAC-recommended scope of work to redetermine the Sustainable Yield by January 1, 2025, which included an initial task to extend the BVHM from WY 2016 through WY 2021 and compare model-estimated groundwater pumping to the newly-available metered groundwater pumping data from the Meter Reading Program (see Section 3.1.1.2). The objective of this task was to evaluate the ability of the BVHM, specifically the Farm Process Package (FMP), to accurately estimate historical and future pumping because this ability is essential to future redeterminations of the Sustainable Yield.

Watermaster began implementing the scope of work in WY 2022 and published a TM documenting: (i) the model results, (ii) the comparison of model-estimated pumping versus newly-metered pumping in WY 2021, and (iii) recommendations for additional model updates and/or model recalibration that are necessary to redetermine the Sustainable Yield by 2025 (West Yost, 2022b).⁴⁷ In comparing model-estimated pumping to metered pumping, the TAC identified that the FMP was underestimating groundwater pumping by approximately 42 percent and identified several other model discrepancies that could directly impact the BVHM’s ability to accurately estimate the water budget and Sustainable Yield. The TAC identified improving the ability of the FMP to accurately estimate pumping as the top priority issue to address prior to the 2025 redetermination of the Sustainable Yield.

In WY 2023, the TAC recommended a revised scope of work, schedule, and budget to complete the 2025 Redetermination of Sustainable Yield. The Board approved a revised scope of work and budget at its February 9, 2023 Regular Meeting. The scope of work was funded by the DWR SGM grant. The revised

⁴⁷ Available on the Watermaster’s website at: <https://borregospringswatermaster.com/wp-content/uploads/2022/12/TM-940-2021-BVHM-Extension-220921.pdf>

scope of work to complete the redetermination of Sustainable Yield by January 1, 2025 included the following five tasks:

- Task 1 – Compare Farm Process (FMP)-Estimated Pumping to Actual Pumping for WY 2022
- Task 2 – Update Water-Use Factors in the FMP
- Task 3 – Correct Errors Identified in the 2021 BVHM
- Task 4 – Perform Model Recalibration
- Task 5 – Determine the Sustainable Yield⁴⁸

The work to redetermine the 2025 Sustainable Yield was completed in WY 2024 and is documented in a TM⁴⁹ on the [Watermaster’s website](#). The scope of work culminated in an updated and recalibrated version of the BVHM, referred to as the 2022 BVHM, with refined estimates of historical groundwater elevations, changes in storage, and water budget calculations that were produced using updated pumping data and groundwater level measurements. Results from the 2022 BVHM supersede those from the prior model version (2016 BVHM), which had been relied upon in the GMP and prior Annual Reports. The improved calibration of the 2022 BVHM provides a more reliable tool for simulating historical and future groundwater conditions and trends and will be used to support future analyses and reporting, including in this Annual Report and the five-year assessment of the GMP.

The simulated water budgets for the Basin produced from the model calibration and uncertainty analysis produced in Task 4 were used to estimate the 2025 Sustainable Yield. The Sustainable Yield represents the average annual volume of groundwater that can be pumped from the Basin without causing chronic overdraft conditions. Based on the water budgets produced by the ten realizations in the uncertainty analysis, the 2025 Sustainable Yield ranges between 7,568 afy and 8,078 afy. The most defensible model realization is the calibrated 2022 BVHM, which yielded a Sustainable Yield estimate of 7,952 afy.

In WY 2025, the TAC and the Watermaster’s Technical Consultant each prepared independent recommendation reports to the Watermaster Board with technical opinions on the 2025 Sustainable Yield. Based on the recommendations from the TAC⁵⁰ and the Technical Consultant, the Watermaster Board approved the redetermination of the 2025 Sustainable Yield as 7,952 afy at its December 5, 2024 meeting, ahead of the January 1, 2025 Judgment deadline. The 2025 Sustainable Yield of 7,952 afy is an approximate 40 percent increase relative to the Initial Sustainable Yield of 5,700 afy. The increase in the Sustainable Yield is driven by the improvements made to the 2022 BVHM, which led to an increase in simulated inflows and a decrease in simulated outflows.⁵¹

⁴⁸ At its September 2024 meeting, the Board determined that the 2025 Sustainable Yield should be based on the historical water budget derived from Task 4 – Model Recalibration. Hence, the entirety of Task 5, which included performing model runs of future pumping using the BVHM, was not performed as part of the redetermination effort. However, the Board has directed this effort to proceed and be completed by March 31, 2025, as part of the 5-year Assessment.

⁴⁹ West Yost. 2024. [Compilation of Technical Work to Redetermine the 2025 Sustainable Yield](#). Prepared for the Borrego Springs Watermaster. October 29, 2024.

⁵⁰ See Section 3.2.3. of this report for more information on the TAC Recommendation Report.

⁵¹ For more information on the differences between the inflow and outflow terms estimated by the 2022 BVHM (and used to estimate the 2025 Sustainable Yield) and the water terms used to estimate the Initial Sustainable Yield, refer to West Yost, 2024 (referenced above).

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As described above, the redetermination of the 2025 Sustainable Yield was performed using the best available records and data, and sound scientific and engineering methods. It considered all sources of replenishment to the Basin, including return flows and underflows, and all outflows from the Basin, and was informed by the updated and calibrated 2022 BVHM.

Following the redetermination of the 2025 Sustainable Yield, additional work was performed in WY 2025:

- Revised Rampdown Schedule to the redetermined Sustainable Yield.** As described in Section 1.3.1 of this Annual Report, a change to the 2025 Sustainable Yield results in a change to the Rampdown schedule beginning in the Second Five Year Period (WY 2026 to 2030). Under the Rampdown schedule to the 2025 Sustainable Yield, the Annual Allocation is ramped down to 66 percent of BPA (34 percent reduction of pumping) by WY 2030 and to 33 percent of BPA (67 percent reduction of pumping) over the 20-year implementation period. Table 14 compares the Rampdown schedule, expressed as percent of BPA that can be pumped, under the Initial Sustainable Yield (5,700 afy) to the Rampdown schedule under the 2025 Sustainable Yield (7,952 afy) over the 20-year implementation period from WY 2020 through WY 2040. Pumpers in the Basin were notified of the redetermination of the 2025 Sustainable Yield, along with the changes to the Rampdown schedule and Annual Allocation.

Water Year	Percent of BPA under the Initial Sustainable Yield	Percent of BPA under the 2025 Sustainable Yield
2020	100	100
2021	95	95
2022	90	90
2023	85	85
2024	80	80
2025	75	75
2026	70	73
2027	65	72
2028	60	70
2029	55	68
2030	50	66
2031	48	63
2032	45	60
2033	43	56
2034	40	53
2035	38	50
2036	35	46
2037	33	43
2038	30	39
2039	28	36
2040	25	33

- **Use the 2022 BVHM to predict future groundwater conditions in the Basin** under future groundwater pumping plans (based on current plans of the pumpers) to assess the long-term sustainability under a Rampdown to the 2025 Sustainable Yield (*i.e.* changes in groundwater levels and storage). The model was extended through WY 2070 and model input files were updated to reflect the projection period. The 2022 BVHM was run in projection mode through WY 2070 and the results were evaluated for the potential for Undesirable Results (*i.e.* chronic lowering of groundwater levels). These model projections are an ongoing effort and will be documented in the 5-Year Assessment.

3.4.2 Redetermination of the 2030 Sustainable Yield

As required by Section III.F of the Judgment, the Watermaster will continue to refine and redetermine the Sustainable Yield every five years through 2035 to reflect new information, improved data and tools, and advances in Basin understanding. The Watermaster must establish the Sustainable Yield for the third five-year period of WY 2031 through WY 2035 by January 1, 2030.

In WY 2025, the Watermaster, with TAC input, developed and approved an initial scope of work and budget to implement over the next four years (WY 2026-2029) to redetermine the 2030 Sustainable Yield by January 1, 2030. The approved scope of work includes two tasks:

- **Task 1 – GDE Study Results.** In this task, the results of the GDE Study Report will be reviewed to determine if improvements should be made to the BVHM to improve its ability to simulate the evapotranspiration (ET) of shallow groundwater.
- **Task 2 – Monitoring Program Data.** In this task, monitoring program data (measured groundwater levels and metered pumping data) will be analyzed to determine if improvements should be made to the BVHM to improve its ability to estimate pumping, groundwater levels, and the water budget of the Basin.

Implementation of the scope of work to redetermine the 2030 Sustainable Yield will begin in WY 2026.

3.5 Analysis of Carryover

As summarized in Section 1.3.1 of this Annual Report, the Judgment currently allows for a Party's unused Annual Allocation to be carried over for use in subsequent WYs and may accrue up to two times the amount of the Party's BPA (2x BPA) as Carryover. When exercised, Carryover is fully consumed and does not create additional pumping rights beyond those already accounted for under the Rampdown. Section III.B of the Judgment requires that Carryover be periodically reviewed and that Carryover rules may be amended if they prevent the Basin from achieving sustainability in WY 2040 and beyond by causing Undesirable Results that cannot be mitigated; however, once Carryover is accrued pursuant to rules then in effect, the rules may not be changed as to the accrued Carryover (*e.g.*, the rate or amount of loss may not be modified) because the Groundwater reflected in Carryover is treated for purposes of Basin-wide production accounting, as if already Pumped and used. Accordingly, any Basin-wide need for reduced Pumping will be achieved through additional Rampdown of BPA rather than reduction of a Pumper's existing Carryover at the date of any change in Carryover rules. The first Carryover evaluation was completed in WY 2025 to satisfy the January 1, 2025 deadline set in the Judgment.

Based on the results of the analysis and its limitations, the Watermaster concluded that it was premature to amend the existing Carryover rules. At its December 19, 2024 Special Board Meeting, the Watermaster Board elected to make no amendments to the Carryover rules defined in the Judgment and to revisit the Carryover analysis in 2030, following completion of the redetermination of the 2030 Sustainable Yield.

The methods, results, and recommendations of this analysis were described in a TM⁵², which documented compliance with the Judgment’s evaluation requirement and deferred any potential policy changes until additional data, and modeling and implementation results are available. This decision was reported to the Court during the Watermaster’s August 21, 2025 Status Conference.

3.6 Biological Restoration of Fallowed Lands Project

To capitalize on available grant funding for SGMA implementation, the EWG developed a scope of work⁵³ to develop data, information, and criteria to guide the use of biological restoration as a technique to mitigate the potential adverse impacts associated with the fallowing of lands (e.g., airborne dust emissions, introduction of invasive species, etc.) that is expected to occur within the Basin in order to meet the sustainability goal of reducing groundwater pumping. The anticipated benefits of restoring fallowed land include reduced water consumption, management of airborne dust emissions, increased natural biodiversity and habitat value, and maintenance/enhancement of values pertinent to the ABDSP and the residents of Borrego Springs.

The project was administered by the EWG and performed by Land IQ. The project included the following main tasks:

- Task 1 - Review and Analysis of Existing Data
- Task 2 - Existing Abandoned Farmland and Reference Natural Habitat Study
- Task 3 - Brush Pile Wildlife Sand Fence Case Study
- Task 4 - Farmland Fallowing Rehabilitation Strategies
- Task 5 - Farmland Fallowing Prioritization

The project was completed in WY 2025. The following work was performed during the reporting period:

- Task 3 - *Brush Pile Wildlife Sand Fence Case Study*. The objective of this task is to assess the feasibility and effectiveness of various fallowing techniques on dust mitigation and habitat recovery. In WY 2025, Watermaster completed construction of the four fallowing techniques (mulch rows, scattered trees, tree fence rows, and temporary sand fence rows) on the study sites. Dust monitoring equipment was installed and monitoring was performed to evaluate the performance of the techniques. Land IQ monitored the study sites from October 2024 to March 2025 (through the end of SGM grant funding).

Following the end of the SGM funding, monitoring was continued through May 2025 by Master’s degree students in the Conservation and Restoration Science Program at UCI as part of their “Capstone Project.” The objective of the monitoring program was to assess the effectiveness of the various Sand Fences at: managing airborne dust emissions; increasing natural biodiversity and habitat value; and maintaining or enhancing values pertinent to the ABDSP and the residents of Borrego Springs. The UCI Master’s students presented their findings to the EWG at its June 12, 2025 meeting and documented the prepared a final

⁵² See agenda Item IV.B of the December 19, 2024 Special Board Meeting agenda package, available on the Watermaster’s website at: https://borregospringswatermaster.com/wp-content/uploads/2024/12/20241219_Board-Agenda-Package.pdf

⁵³ Available on the Watermaster’s website at: https://borregospringswatermaster.com/wp-content/uploads/2023/01/Project-Submittal-Form_Biological-Restoration_com.pdf

report entitled *Erosion Control and Habitat Restoration of Retired Farmland in the Anza-Borrego Desert*.⁵⁴

- **Task 4 - Farmland Following Rehabilitation Strategies.** The objective of this task is to utilize the literature review and data collected in Tasks 1-3 to develop, design, and recommend best practices for fallowing farmland. In WY 2025, Land IQ completed development of conceptual models of the key processes involved in dust mitigation, native habitat recruitment, and habitat restoration of fallowed farmland. The conceptual models were used to design, and ultimately, recommend optimal rehabilitation strategies for fallowing farmland in Borrego Springs.
- **Task 5 - Farmland Following Prioritization.** The objective of this task is to develop a prioritization model and map for fallowing permanently farmland based on the goals of reducing groundwater pumping and the likelihood of successful biological rehabilitation strategies. In WY 2025, Land IQ developed a prioritization model and corresponding fallowing prioritization maps that integrate site characteristics, restoration feasibility, and anticipated ecological benefits.

All project work from Tasks 1 through 5 was documented in a final technical report titled *Recommended Retired Farmland Rehabilitation Strategies and Prioritization*,⁵⁵ published in March 2025.

In WY 2026, the EWG will develop recommendations for the Watermaster Board based on the results and recommendations of the Biological Restoration of Fallowed Lands project. The Board will review the recommendations and determine if the Judgment and/or GMP should be modified to include the recommended methods, in addition to the required strategies already listed in the Judgment.

3.7 Groundwater Dependent Ecosystem Study

The Watermaster’s 2020 GMP states that the rooting depths of the Mesquite Bosque in the Borrego Sink area became largely disconnected from the regional aquifer of the 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 GDE or beneficial user of groundwater in the GMP. A study of the Mesquite Bosque was conducted by the UCI, Tubb Canyon Desert Conservancy, and the San Diego Natural History Museum using SGM grant funding administered by the BWD to generate more information on the groundwater dependency of the Mesquite Bosque, which has been documented in a report published in May 2025 (GDE Study Report).⁵⁶ The GDE Study Report is considered “new information” which could potentially be used by the Watermaster to (i) update the BVHM to better estimate the water budget of the Basin and/or (ii) update the SMC in the GMP. However, since the technical information was not generated by Watermaster, the Watermaster must determine if the report constitutes “best available science” prior to taking action or making policy decisions. Under Watermaster’s policy on the use of “best

⁵⁴ Available on the Watermaster’s website at: <https://borregospringswatermaster.com/wp-content/uploads/2025/06/2025-Capstone-Report-Final.pdf>

⁵⁵ Available on the Watermaster’s website at: <https://borregospringswatermaster.com/wp-content/uploads/2025/03/Task04-05-Retired-Farmland-Strategies-and-Prioritization-2025-03-31.pdf>

⁵⁶ Available on the Watermaster’s website at: https://borregospringswatermaster.com/wp-content/uploads/2025/07/GDE-Final-report_15May2025-1.pdf

available science”,⁵⁷ the GDE Study Report must undergo an independent review and recommendation from the TAC, the EWG, and/or Technical Consultant.

During WY 2025:

- The Technical Consultant, in coordination with the TAC, developed a scope of work to perform the review of the GDE Study Report, which included defining the roles of the TAC, EWG, and Technical Consultant.
- TAC and EWG members began their review of the GDE Study Report as “Best Available Science.”

In WY 2026, the following work will be performed:

- The TAC and EWG members will complete their review of the GDE Study Report as “Best Available Science.”
- The Technical Consultant will perform a technical review of the GDE Study Report as “Best Available Science” and prepare a draft Recommendation Report.
- Joint TAC/EWG meetings will be conducted to discuss the GDE Study Report and the draft Recommendation Report.
- The TAC/EWG will prepare their own Recommendation Report to the Board on potential next steps and discuss at an additional joint TAC/EWG meeting.
- The Technical Consultant will develop a scope of work and cost estimate for next steps in WY 2026 and 2027, based on the Recommendation Reports.
- The Watermaster Board will consider the Recommendations Reports.

3.8 Five-Year Assessment of Groundwater Management Plan

Title 23 § 356.4 of the CCR requires agencies to perform an evaluation of GSPs, or plans submitted as alternatives to a GSP, at least once every five years and provide a written assessment to DWR (Assessment Report). The regulations require that the Assessment Report describe how plan implementation is working toward meeting the sustainability goal(s) for the Basin and prescribes other specific information that must be addressed.

As described in Section 1.3.1, Watermaster submitted its Judgment and GMP to the DWR as an alternative (GSP) for the Basin. The Judgment/GMP was first submitted as an Alternative Plan to the DWR on January 31, 2020. The submission was subsequently updated on June 25, 2021, following the entry of the Judgment in the Superior Court of Orange County. The DWR approved the Alternative Plan on February 25, 2025⁵⁸ in a letter that documented the evaluation, along with seven RCAs. The first five-year assessment of the Alternative Plan is due to DWR by June 25, 2026 (five years after the revised submission on June 25, 2021).

During WY 2025, Watermaster continued performing the 5-Year Assessment of the GMP utilizing available DWR SGM grant funding through March 2025. Because DWR comments on the Alternative Plan were not received until the end of February 2025, Watermaster was unable to use SGM grant funding to review

⁵⁷ 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

⁵⁸ Available on the Watermaster’s website at: https://borregospringswatermaster.com/wp-content/uploads/2025/03/DWR_BorregoSprings_GSP2025_Determination.pdf

and respond to DWR comments. Instead, the Watermaster used the SGM grant funding to prepare as much of the report as possible. Following the expiration of SGM grant funding, the Watermaster began addressing the DWR RCAs. The following work was performed on the 5-Year Assessment in WY 2025:

- Reviewed the DWR assessment letter of the Alternative GSP for Borrego Springs.
- Developed an annotated outline and framework for completion of the 5-Year Assessment Report⁵⁹, inclusive of a high-level summary of the DWR requirements and a description of information to be included for each section.
- Developed a scope, schedule, and identified funding available to cover the work to address the DWR RCAs and finalize the 5-Year Assessment Report since the work could not be completed with SGM funding due to the delayed receipt of DWR comments.
- Held monthly workshops with the Watermaster Board from June through September 2025 to discuss addressing DWR comments on the Judgment/GMP and recommended approaches to address RCAs, update SMC, and prepare the 5-Year Assessment Report.
- Developed future pumping plans for use in running BVHM projections of the pumping Rampdown to predict future expected changes in groundwater levels and storage under the 2025 Sustainable Yield. While the pumping projections used in the model simulations presented in Section 8.2.4 represent pumper best estimates at this time, the subject projections reflect a pumping volume that is different than (less than) the water rights allocation established in the Judgment. The Pumpers therefore have the right to pump more groundwater than is projected, in accordance with the Judgment Rampdown schedule. And, in some cases, projected pumping plans presuppose the ability of Parties to transfer water between BPA parcels. Given that this type of transfer is subject to Watermaster approval, some pumping plans may not be achievable if a transfer is not approvable in accordance with Judgment criteria. If the full pumping rights allowed by the Judgment were exercised, or a different pumping plan manifests due to restricted transfers, will potentially affect the outcomes for groundwater levels and storage.
- Developed and implemented methodologies for updating SMC for groundwater levels, groundwater storage, and groundwater quality to address RCAs No. 3, 4, and 5, respectively.
- Collaborated with the TAC to update the SMCs for groundwater level, groundwater storage, and groundwater quality and to discuss the response to RCA No. 6 regarding land subsidence.

In WY 2026, the Watermaster will:

- Complete developing approaches to respond to each DWR comment and address the DWR RCAs.
- Continue holding monthly workshops with the Watermaster Board to discuss addressing DWR comments on the Judgment/GMP and recommended approaches to address RCAs, update SMC, and prepare the 5-Year Assessment Report.
- Host public workshops on updates to the SMC and the draft 5-Year Assessment Report.
- Prepare a redline version of the GMP to identify the changes and updates recommended in the 5-Year Assessment Report.

⁵⁹ Available on the Watermaster’s website at: <https://borregospringswatermaster.com/wp-content/uploads/2025/05/C7-d-5-year-Assessment-Framework.pdf>

- Hold a two-day workshop with the Watermaster Board to review the draft 5-Year Assessment Report and proposed changes to the GMP.
- Complete a draft and final 5-Year Assessment Report and submit to the DWR by June 25, 2026.

3.9 Stakeholder Engagement

The DWR SGM grant provides funding for public outreach and engagement efforts. Using grant funding, the Watermaster began hosting Open Houses to facilitate public outreach and provide a venue to receive public input on grant-related projects, Watermaster activities, and sustainable management of the Basin. The Open Houses are an opportunity for the public to meet with, ask questions, and have a discussion with Watermaster Staff and Board members. All Watermaster Open Houses are noticed via Watermaster’s Email Distribution List and website.

During WY 2025, the Watermaster held two Open Houses; one meeting was held in-person at the Borrego Springs Library (with a virtual option via GoToMeeting) and the other was held virtually via the GoToMeeting® platform. A regular Watermaster Board meeting followed each Open House. Table 15 lists the Open House meeting dates, meeting format, and a summary of the topics discussed in WY 2025.

Table 15. Open Houses and Topics During the Reporting Period	
Open House Date and Format	Topics Discussed
November 7, 2024 (In-Person)	<ul style="list-style-type: none"> • The 2025 redetermination of the Sustainable Yield of the Basin
March 19, 2025 (Virtual)	<ul style="list-style-type: none"> • Presentation on the Biological Restoration of Fallowed Lands project • Presentation on the Groundwater Monitoring and Management projects in Borrego Springs • Questions from the public on the following topics not related to the presentations given: <ul style="list-style-type: none"> — Use of the Airborne Electromagnetic (AEM) Survey data — California Environmental Quality Act (CEQA) — DWR’s comments on the 2020 GMP — Basin hydrogeology

4.0 WATER YEAR 2025 WATER RIGHTS ACCOUNTING

Watermaster is responsible for performing water rights accounting on an annual basis to track pumping, Carryover elections, transfers, and leases between the Parties, and to calculate the Adjusted Pumping Calculation. Pumping assessments and total allowable pumping by Party for the ensuing WY are based on the Adjusted Pumping Calculation. On occasion, adjustments are made to prior Water Rights Accounting when new information is available and warrants corrections to past records; all changes to prior Water Rights Accounting are documented in Appendix F.

The accounting process provides for a transparent demonstration that the water rights, Rampdown, Carryover, and transfer provisions of the Judgment are being implemented as intended.

4.1 Definitions

Key definitions for the Watermaster's Water Rights Accounting are defined in this section.

4.1.1 Judgment Terms for Water Rights Accounting

Key definitions from the Judgment for the Watermaster's Water Rights Accounting are:

Baseline Pumping Allocation. BPA is the maximum allowed pumping quantity allocated to a Party (Judgment Section I.A.8). Exhibit 4 to the Judgment defines the BPA for each Party to the Judgment. Exhibit 4 is to be updated annually with any changes to BPA allocation based on Permanent Transfers of rights (see Appendix E). The total BPA is 24,293 af.

Rampdown Rate. The Rampdown Rate is the percentage reduction in cumulative authorized pumping of BPA effective across the Basin in any particular WY, which when subtracted from 100 percent will determine the effective Pumping Percentage (Judgment Section I.A.51). For example, the Rampdown Rate for the first five-year period is 25 percent, for a total of five percent Rampdown of BPA per year. The Rampdown Rate for WY 2025 is 25 percent (Annual Allocation = 75 percent of BPA). The Rampdown rate is updated after each redetermination of the Sustainable Yield and was most recently updated based on the redetermination of the 2025 Sustainable Yield (see Section 3.4.1). The next redetermination of Sustainable Yield will be adopted in WY 2030.

Pumping Percentage. The Pumping Percentage is the percentage of a Party's BPA that is authorized to be pumped in any particular WY, based on the pumping Rampdown Rate in effect (Judgment Section I.A.49). For example, in WY 2025 the Pumping Percentage is 75 percent, which is a 25 percent pumping Rampdown from BPA.

Annual Allocation. The Annual Allocation is the maximum amount of pumping allowed by a Party in a given WY, excluding Carryover or imported water, if available. The Annual Allocation for each WY will be determined by multiplying the Party's BPA by the Pumping Percentage in effect for that WY. Annual Allocation is rounded to the nearest whole af (Judgment Section I.A.51). For example, if a Party's BPA is 418 af, the WY 2025 Annual Allocation is 314 af ($0.75 \times 418 \text{ af} = 313.50 \text{ af}$, rounded up to 314).

Carryover. Any unused Annual Allocation may be purchased for use in subsequent water years as "Carryover", so long as the Party's assessment is paid in the current year, subject to restrictions on the amount or duration of Carryover specified in Section III.B of the Judgment. The initial maximum quantity of Carryover that a Pumper can accrue is two times the Party's BPA (Judgment Sections I.A.12 and III.B). The first Groundwater produced by a Party during any WY will be deemed to be an exercise of any Carryover (Judgment Section III.G.1). Each year, Parties are presented with the amount of Carryover they

are eligible to elect to purchase. Their Carryover elections must be made within the window of time provided in the Judgment, which is between October 15 and October 31 each year. Any Party that does not timely elect its available Carryover has lost the opportunity to make a Carryover election for that year.

Permanent Transfer. A Permanent Transfer is a transfer of BPA, including any portion of a Party's total BPA, which is permanently added to a grantee's cumulative BPA and subtracted from the grantor's BPA, and when multiplied by the pumping Rampdown percentage will establish additional Annual Allocation of the grantee in each WY (less any water pumped in that year by the selling Party) and thereafter (Judgment Section I.A.42).

Lease. A Lease is a transfer of Annual Allocation or Carryover for one WY or for several WYs, as set forth in a written lease agreement (Judgment Section I.A.32).

Adjusted Pumping Calculation. The Adjusted Pumping Calculation is the basis of establishing each Party's pumping assessment and is defined in Section IV.E.4 of the Judgment. Section IV.E.4 establishes that the annual Watermaster Budget will be funded through the establishment of an annual uniform pumping assessment (expressed in \$/af of pumping). The Adjusted Pumping Calculation is computed for all Parties with BPA rights and for the two parties with other non-De Minimis water rights (ABDSP and BSUSD).

Watermaster calculates each Party's annual Adjusted Pumping Calculation in af as follows:

$$\begin{aligned} &+ \text{Total Pumping by Party (af)} \\ &+ \text{Total Pumping by Party's Lessee (af)} \\ &- \text{Amount of Carryover Pumped by Party (af)} \\ &- \text{Amount of Annual Allocation or Carryover Leased from Others and Pumped by Party (af)} \\ &+ \text{Carryover Election (af)} \\ \hline &= \text{Adjusted Pumping Calculation (af)} \end{aligned}$$

Overproduction. Overproduction is pumping by a Party in any particular WY that is in excess of the sum of the Party's Annual Allocation plus any leased Annual Allocation plus any accrued Carryover (Judgment Section I.A.38). Overproduction must be covered within one year of the Overproduction, either by using less Annual Allocation (e.g., under-pumping the allowable pumping limit afforded by Annual Allocation) or applying Carryover in the subsequent WY or by Lease or Permanent Transfer. If Overproduction is not covered by one of these means by the end of the subsequent WY, an Overproduction Penalty Assessment applies. For example, a Party that engages in Overproduction in WY 2025 has until the end of WY 2026 to remedy the Overproduction through the means stated herein.

Special Rules for Overproduction during the first three Water Years. Under Judgment section III.G.1, 2 and 3, special rules apply to Overproduction in the first three WYs: WY 2021, WY 2022, and WY 2023. During the first three WYs, no Party will be subject to an immediate Overproduction Penalty Assessment so long as such Party's total cumulative Overproduction in those WYs does not exceed the Maximum Overproduction Limit. The Maximum Overproduction Limit is 20 percent of a Party's cumulative Annual Allocation for WY 2021 through WY 2023. Any Party that engages in Overproduction in any of the first three WYs that does not exceed the Maximum Overproduction Limit will be notified by the Watermaster of the amount of Overproduction annually following the end of the WY. The Party engaging in Overproduction shall cover the cumulative quantity of its Overproduction that occurred in WY 2021, WY 2022 and WY 2023 by the end of WY 2025 through either Carryover, reduced production below the

authorized Annual Allocation in WY 2024 and WY 2025, or through lease or permanent transfer. If the Party has not covered its Overproduction from WY 2021, WY 2022, and WY 2023 by the end of WY 2025 (September 30, 2025), an Overproduction Penalty Assessment will be assessed to the Party.

4.1.2 Additional Terminology for Water Rights Accounting

In addition to the definitions from the Judgment, the following terminology are used by the Watermaster to support the water rights accounting:

Other Non-De Minimis Water Rights. This is the term used to refer to the Judgment-defined water rights of the ABDSP (20 afy) and the BSUSD (22 afy) that are not BPA rights. This terminology is used to distinguish them from BPA rights. Although these rights do not qualify for Carryover and cannot be leased or transferred, the pumping pursuant to them must be considered in the Adjusted Pumping Calculation and in assessing Overproduction. The ABDSP and BSUSD are called Parties with non-De Minimis rights.

Total Allowable Pumping. The total allowable pumping in a particular WY is the total amount of pumping that a Party can do without triggering Overproduction rules. The total allowable pumping is computed as follows:

- For BPA Parties: the total allowable pumping is the sum of the WY Annual Allocation plus (or less than) any transfers and leases of Annual Allocation plus any available Carryover account balance at the beginning of the WY.
- For Parties with non-De Minimis rights: the total allowable pumping is the sum of the non-De Minimis Water rights plus any transfers and leases of Annual Allocation or Carryover.

4.2 Transfers and Leases

Pursuant to Section III.I of the Judgment, all Parties have the option for a Permanent Transfer or Lease of BPA, Annual Allocation, or Carryover Rights. Each type of Transfer is described in the sections below.

Parties who elect to transfer BPA, Annual Allocation, or Carryover Rights are required to identify the total volume transferred, the term of the Transfer, the Party responsible for payment of applicable pumping assessments, and identify the assigned parcels and wells that the transferred water may be used at. All transfers and leases are reviewed by Watermaster staff to ensure compliance with the terms of the Judgment (such as compliance with minimum following standards) and documented on Watermaster-approved forms.⁶⁰

Once the Transfer or Lease documents are complete and executed by the parties to the Transfer or Lease, Watermaster, and Legal Counsel, the Transfers or Leases are submitted to the Board to receive and file as part of a Consent Calendar action, unless further direction for approval is needed. Such further direction may result in restricting the Permanent Transfers and Leases, but only after a review of reasonable, evidenced-based concern that the Permanent Transfer or Lease will cause or exacerbate Undesirable Results, and the restriction may only be in a manner that is equitable to all affected Pumpers. Permanent Transfers also trigger an update to Exhibit 4 of the Judgment, which is a listing of BPA by Party.

⁶⁰ <https://borregospringswatermaster.com/pumper-resources/>. See Forms for Documentation and Approval of Water Rights Transfers.

4.2.1 Permanent Transfers of BPA

Section III.I of the Judgment describes the provisions for Permanent Transfer of BPA. During WY 2025, there were three permanent Transfers of BPA, totaling 2,606.75 af. The Transfers included:

- 1,462 af of BPA was automatically transferred from Borrego Nazareth LLC to T2 Tilting T LLC through a property sale. This transfer includes the entirety of BPA rights, BPA parcels, wells, and Carryover. The amount of Carryover included with the transfer was 1,330.83 af. At the time of purchase, T2 Tilting T LLC was not a Party to the Judgment. T2 Tilting T LLC has filed a motion to intervene into the Judgment that will be heard by the Court in WY 2026. T2 Tilting T LLC will have the ability to exercise its water rights upon Court approval of the intervention.
- 2.75 af of BPA was transferred from T2 Farms LLC to the BWD through a standalone transfer of BPA in exchange for water service. The transfer does not include transfer of a BPA parcel.
- 1,142 af of BPA was automatically transferred from Bagdasarian Farms, LLC to T2 Borrego, LLC through a property sale. This transfer includes the entirety of BPA rights, BPA parcels, and wells. The prior owner held no Carryover Rights.

Appendix E of this Annual Report contains the updated Exhibit 4 listing of BPA by Party as of October 1, 2025. The most current version of Exhibit 4 is also available on the Watermaster's website.

4.2.2 Leases of Annual Allocation

Parties may Lease part or all of their Annual Allocation to another Party (BPA or Non-De Minimis) for a specific WY. In the Lease of Annual Allocation, the BPA right is retained by the Lessor. Parties that Lease Annual Allocation have the option to include the Allocation's Carryover Rights as part of the transaction. For Leases where the Transferor elects to include Carryover Rights in the Transfer, the Transferee may make an election of a portion of or all of the associated Carryover from any unpumped Annual Allocation leased (subject to limits on Carryover). For Leases where the Transferor elects to exclude Carryover Rights from the transfer of Annual Allocation, the Transferor may make an election of a portion of or all of the associated Carryover from any unpumped Annual Allocation transferred (subject to limits on Carryover).

There were no Leases of Annual Allocation among Parties during WY 2025.

4.2.3 Transfers of Carryover Rights

Parties may transfer Carryover to another Party (BPA or Non-De Minimis). Transfers of Carryover are subject to the limits established by the Judgment, including that Carryover is the first water pumped each year and the maximum amount of Carryover allowed to be held by a Party is two times the Party's BPA.

During WY 2025, there were six transfers of Carryover not associated with the full permanent transfers of BPA noted above, totaling 310.70 af. Table 16 identifies the transfers of Carryover that occurred in WY 2025.

Table 16. Transfers of Carryover in WY 2025

Transferor	Transfer Amount	Transferee
Gary D. & Darlis A. Bailey	2 af	Gamini D. Weerasekera
T2 Palms, LLC	122.70 af	T2 Borrego LLC (Purchase from Bagdasarian Farms LLC)
T2 Tilting T LLC	100 af	Gamini D. Weerasekera
T2 Tilting T LLC	8 af	Carpenter Family Trust 12-11-07
T2 Tilting T LLC	58 af	Soli Organic Inc.
T2 Borrego, LLC - Ram's Hill	20 af	CWC Casa Del Zorro LLC

4.3 Adjusted Pumping Calculation for WY 2025

To support the estimation of the Adjusted Pumping Calculations, Watermaster is required to submit a notice to each Party of its total prior WY pumping, the amount of Carryover pumped, the amount of any Leases and Transfers pumped, and the maximum amount of Annual Allocation eligible for Carryover from the preceding WY by October 15th of each new WY. The report must also provide an estimate of the Pumping Assessment for the ensuing WY to support the Parties’ elections to Carryover or not pump. The schedule in Section IV.E.4 of the Judgment also prescribes that all elections to Carryover or to not pump must be reported to the Watermaster by October 31st.

Watermaster completed the WY 2025 Water Rights Accounting in November 2025 and reported it to the Board at its November 19, 2025 regular Board meeting. Table 17 shows the summary of the WY 2025 Water Rights Accounting for each Party to the Judgment, including the Parties with BPA rights and the Parties with other non-De Minimis rights (ABDSP and BSUSD). Table 17 also includes detailed footnotes on how each column of information is obtained or calculated.

Table 17. WY 2025 Water Rights Accounting Summary for the Borrego Springs Subbasin - (all values in acre-feet)

BPA Party or Party with Other Non-De Minimis Water Rights ¹	BPA or Other Non-De Minimis Rights as of Sep 30, 2024 ¹	Permanent Transfer of BPA ^{1,2} effective in WY 2025	BPA or Other Non-De Minimis Rights as of Oct 1, 2024	Maximum Allowable Carryover Account Balance ^{3,1}	Carryover Account Balance as of Oct 1, 2024 ^{3,1}	Total Balance of Overproduction to Resolve Effective WY 2025 ⁴	WY 2025 Annual Allocation per Rampdown: 75% of BPA ⁵ ; 100% of non-BPA rights ^{6,1}	Leased or Transferred Annual Allocation Effective in WY 2025 ²	Transferred Carryover Effective in WY 2025 ²	Total Allowable Pumping for WY 2025 ⁷	Total Pumping in WY 2025	WY 2025 Pumping was Metered or Estimated ⁸	Carryover Pumped in WY 2025 ^{9,1}	Was Overproduction prior to WY 2025 Resolved?	Balance of Overproduction incurred in WY 2025 to Resolve by end of WY 2026 ¹⁰	Pumping Allocation Eligible for Carryover ¹¹	Carryover Election by Party	Carryover Account Balance as of October 1, 2025	WY 2025 Adjusted Pumping Calculation
	(a)	(b)	(c) = (a) + (b)	(d) = 2 x (c)	(e)	(f)	For BPA Parties: (g) = 0.75 x (c) For other Parties: (g) = (c)	(h)	(i)	(j) = (e) + (g) + (h) + (i) - (f)	(k)	(l)	(m) ¹⁰	(n)	(o) = (k) - (j) ¹¹	(p) ¹³	(q)	(r) = (e)+(i)-(m)+(q)	(s) = (k)-(m)-(h)+(q)
TOTALS	24,335	0.00	24,335	48,586	24,959.93	327.54	18,270	0.00	0.00	42,902.39	10,128.95		8,259.26		101.64	13,807.08	8,635.97	25,050.16	10,505.66
BPA Parties																			
BPA Party Subtotal	24,293	0	24,293	48,586	24,959.93	327.54	18,228	0.00	0.00	42,860.39	10,100.77		8,259.26		101.64	13,807.08	8,635.97	25,050.16	10,477.48
Agri-Empire	574	0	574	1,148	0.00	0.00	431.00	0.00	0.00	431.00	0.00	Metered	0.00	na	0.00	431.00	0.00	0.00	0.00
Rick and Joan Anson, co-trustees of the Anson Family Trust 08-1 8-08	2	0	2	4	0.00	0.00	2.00	0.00	0.00	2.00	0.00	na	0.00	na	0.00	2.00	0.00	0.00	0.00
Alan & Tracy Asche	5	0	5	10	10.00	0.00	4.00	0.00	0.00	14.00	1.13	Metered	1.13	na	0.00	1.13	1.13	10.00	1.13
Gary D. & Darlis A. Bailey	7	0	7	14	3.87	0.00	5.00	0.00	-2.00	6.87	4.55	Metered	1.87	na	0.00	2.32	2.32	2.32	5.00
David and Juli Bauer, co-trustees of the D&J Bauer Family Trust 11-18-04	1,411	0	1,411	2,822	0.00	0.00	1,058.00	0.00	0.00	1,058.00	506.00	Metered	0.00	na	0.00	552.00	26.00	26.00	532.00
BWD (Purchase from D & J Bauer and attached only to APN 140-070-18)	415	0	415	830	685.00	0.00	311.00	0.00	0.00	996.00	0.00	na	0.00	na	0.00	145.00	145.00	830.00	145.00
BWD (Purchase from W. Bauer and attached only to APN140-010-08)	670	0	670	1,340	1,340.00	0.00	503.00	0.00	0.00	1,843.00	0.00	na	0.00	na	0.00	0.00	0.00	1,340.00	0.00
Borrego Air Ranch Mutual Water & Improvement Co.	12	0	12	24	13.23	0.00	9.00	0.00	0.00	22.23	6.59	Metered	6.59	na	0.00	9.00	9.00	15.64	9.00
Borrego Nazareth LLC ^(A)	1,462	-1,462	0	0	1,330.83	0.00	0.00	0.00	-1,330.83	0.00	0.00	na	0.00	na	0.00	0.00	0.00	0.00	0.00
T2 Tilting T LLC ^(A)	0	1,462	1,462	2,924	0.00	0.00	1,097.00	0.00	1,164.83	2,261.83	45.36	Metered	45.36	na	0.00	1,097.00	1,097.00	2,216.47	1,097.00
Borrego Water District	2,588	2.75	2,591	5,182	2,926.83	0.00	1,943.00	0.00	0.00	4,869.83	1,369.44	Metered	1,369.44	na	0.00	1,943.00	1,943.00	3,500.39	1,943.00
Carpenter Family Trust 12-11-07	6	0	6	12	0.00	5.34	5.00	0.00	8.00	7.66	11.42	Metered	2.66	Yes	3.76	0.00	0.00	0.00	8.76
Tenaja Ranch, LP	4,741	0	4,741	9,482	4,026.18	0.00	3,556.00	0.00	0.00	7,582.18	2,664.04	Metered	2,664.04	na	0.00	3,556.00	0.00	1,362.14	0.00
Desert Farm LLC, Crumrine Family Trust 04-19-06	21	0	21	42	4.12	0.00	16.00	0.00	0.00	20.12	16.80	Metered	4.12	na	0.00	3.32	3.32	3.32	16.00
CWC Casa Del Zorro LLC	22	0	22	44	27.33	0.00	17.00	0.00	20.00	64.33	24.28	Metered	24.28	na	0.00	17.00	17.00	40.05	17.00
De Anza Desert Country Club	957	0	957	1,914	601.15	0.00	718.00	0.00	0.00	1,319.15	712.04	Metered	601.15	na	0.00	607.11	607.11	607.11	718.00
John B. & Silvia H. Hogan	8	0	8	16	6.42	0.00	6.00	0.00	0.00	12.42	5.33	Metered	5.33	na	0.00	6.00	6.00	7.09	6.00
T2 Palms, LLC	887	0	887	1,774	930.60	0.00	665.00	0.00	-122.70	1,472.90	22.75	Metered	22.75	na	0.00	665.00	665.00	1,450.15	665.00
Genus L.P.	112	0	112	224	0.00	0.00	84.00	0.00	0.00	84.00	0.00	na	0.00	na	0.00	84.00	0.00	0.00	0.00
JM Roadrunner, LLC	1,595	0	1,595	3,189.74	2,464.22	0.00	1,196.00	0.00	0.00	3,660.22	804.34	Metered	804.34	na	0.00	1,196.00	1,196.00	2,855.88	1,196.00
Robert Larkins	2	0	2	4	0.00	0.00	2.00	0.00	0.00	2.00	0.00	na	0.00	na	0.00	ne	0.00	0.00	0.00
Michael Maiter & John Savittieri	1	0	1	2	2.00	0.00	1.00	0.00	0.00	3.00	0.00	na	0.00	na	0.00	0.00	0.00	2.00	0.00
Gamini D. Weerasekera	103	0	103	206	0.00	101.10	77.00	0.00	102.00	77.90	144.22	Metered	0.90	Yes	66.32	0.00	0.00	0.00	143.32
Daniel Lee Fetzter and Jennifer Fay Fetzter	14	0	14	28	8.26	0.00	11.00	0.00	0.00	19.26	0.00	na	0.00	na	0.00	11.00	11.00	19.26	11.00
Doug & Patricia Munson	1	0	1	2	2.00	0.00	1.00	0.00	0.00	3.00	0.00	na	0.00	na	0.00	0.00	0.00	2.00	0.00
Ronald Pecoff	114	0	114	228	35.72	0.00	86.00	0.00	0.00	121.72	56.34	Metered	35.72	na	0.00	65.38	0.00	0.00	20.62
The Roadrunner Club at Borrego, LP	520	0	520	1,040	369.88	0.00	390.00	0.00	0.00	759.88	368.44	Metered	368.44	na	0.00	390.00	390.00	391.45	390.00
RTA Borrego, LLC	12	0	12	24	0.00	0.00	9.00	0.00	0.00	9.00	0.00	na	0.00	na	0.00	9.00	0.00	0.00	0.00

Table 17. WY 2025 Water Rights Accounting Summary for the Borrego Springs Subbasin - (all values in acre-feet)

	BPA or Other Non-De Minimis Rights as of Sep 30, 2024 ¹	Permanent Transfer of BPA ^{1,2} effective in WY 2025	BPA or Other Non-De Minimis Rights as of Oct 1, 2024	Maximum Allowable Carryover Account Balance ^{3,1}	Carryover Account Balance as of Oct 1, 2024 ^{3,1}	Total Balance of Overproduction to Resolve Effective WY 2025 ⁴	WY 2025 Annual Allocation per Rampdown: 75% of BPA ⁵ ; 100% of non-BPA rights ^{6,1}	Leased or Transferred Annual Allocation Effective in WY 2025 ²	Transferred Carryover Effective in WY 2025 ²	Total Allowable Pumping for WY 2025 ⁷	Total Pumping in WY 2025	WY 2025 Pumping was Metered or Estimated ⁸	Carryover Pumped in WY 2025 ^{9,1}	Was Overproduction prior to WY 2025 Resolved?	Balance of Overproduction incurred in WY 2025 to Resolve by end of WY 2026 ¹⁰	Pumping Allocation Eligible for Carryover ¹¹	Carryover Election by Party	Carryover Account Balance as of October 1, 2025	WY 2025 Adjusted Pumping Calculation
<i>BPA Party or Party with Other Non-De Minimis Water Rights¹</i>	(a)	(b)	(c) = (a) + (b)	(d) = 2 x (c)	(e)	(f)	For BPA Parties: (g) = 0.75 x (c) For other Parties: (g) = (c)	(h)	(i)	(j) = (e) + (g) + (h) + (i) - (f)	(k)	(l)	(m) ¹⁰	(n)	(o) = (k) - (j) ¹¹	(p) ¹³	(q)	(r) = (e)+(i)-(m)+(q)	(s) = (k)-(m)-(h)+(q)
Jose G. & Maria E. Sanchez	4	0	4	8	0.00	0.00	3.00	0.00	0.00	3.00	1.20	Estimated	0.00	na	0.00	ne	0.00	0.00	1.20
Seley Ranches, L.P.	2,226	0	2,226	4,452	1,856.48	0.00	1,670.00	0.00	0.00	3,526.48	1,219.27	Metered	1,219.27	na	0.00	1,670.00	1,219.27	1,856.48	1,219.27
Soli Organic Inc.	61	0	61	122	0.00	57.35	46.00	0.00	58.00	46.65	78.21	Estimated (P)	0.65	Yes	31.56	0.00	0.00	0.00	77.56
Max Siefker	2	0	2	4	0.00	0.00	2.00	0.00	0.00	2.00	0.00	na	0.00	na	0.00	ne	0.00	0.00	0.00
Brian Siefker Trust 12-18-01	3	0	3	6	0.00	0.00	2.00	0.00	0.00	2.00	0.00	na	0.00	na	0.00	ne	0.00	0.00	0.00
Smith Kent R. Revocable Living Trust 01-04-90	50	0	50	100	100.00	0.00	38.00	0.00	0.00	138.00	0.00	na	0.00	na	0.00	0.00	0.00	100.00	0.00
The Springs RV and Golf Resort, LP	262	0	262	523	142.91	0.00	196.00	0.00	0.00	338.91	284.76	Metered	142.91	na	0.00	54.15	54.15	54.15	196.00
T2 Borrego, LLC	965	0	965	1,930	1,930.00	0.00	724.00	0.00	0.00	2,654.00	0.00	na	0.00	na	0.00	0.00	0.00	1,930.00	0.00
T2 Borrego, LLC - Ram's Hill	2,536	0	2,536	5,072	5,072.00	0.00	1,902.00	0.00	-20.00	6,954.00	789.37	Metered	789.37	na	0.00	809.37	789.37	5,052.00	789.37
T2 Farms LLC	485	-2.75	482.25	965	741.71	0.00	362.00	0.00	0.00	1,103.71	92.06	Metered	92.06	na	0.00	314.85	314.85	964.50	314.85
Bagdasarian Farms, LLC	1,142	-1,142	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	na	0.00	na	0.00	0.00	0.00	0.00	0.00
T2 Borrego, LLC (Purchase from Bagdasarian Farms LLC and attached to APNs 140-070-15, 140-070-20, 140-070-28)	0	1,142	1,142	2,284	0.00	163.75	857.00	0.00	122.70	815.95	815.95	Metered	0.00	Yes	0.00	0.00	0.00	0.00	815.95
Joel Vanasdlen	36	0	36	72	34.00	0.00	27.00	0.00	0.00	61.00	0.00	na	0.00	na	0.00	27.00	0.00	34.00	0.00
Steven L. Phillips Separate Property Trust (Ward BPA Property)	82	0	82	164	164.00	0.00	62.00	0.00	0.00	226.00	17.72	Metered	17.72	na	0.00	17.72	17.72	164.00	17.72
Wisdom Gabriel B & Weiss-Wisdom Diana Family 2008 Trust 08-01-08	1	0	1	2	2.00	0.00	1.00	0.00	0.00	3.00	0.00	na	0.00	na	0.00	0.00	0.00	2.00	0.00
Steven L. Phillips Separate Property Trust (Wright BPA Property)	158	0	158	316	92.93	0.00	119.00	0.00	0.00	211.93	36.43	Metered	36.43	na	0.00	119.00	119.00	175.50	119.00
Ashley Bilyk and Lee Tyler Bilyk	18	0	18	36.26	36.26	0.00	14.00	0.00	0.00	50.26	2.73	Metered	2.73	na	0.00	2.73	2.73	36.26	2.73
Parties with Other Non-De Minimis Water Rights																			
Other Party Subtotal	42	0	42	na	na	0.00	42	0.00	0.00	42	28.18		0.00		0.00	na	na	na	28.18
Borrego Springs Unified School District	22	na	22	na	na	0.00	22.00	0.00	0.00	22.00	21.25	Metered	0.00	na	0.00	na	na	na	21.25
Anza Borrego Desert State Park	20	na	20	na	na	0.00	20.00	0.00	0.00	20.00	6.93	Metered	0.00	na	0.00	na	na	na	6.93

(1) The Judgment establishes separate, non-BPA pumping rights for two entities—the Anza Borrego Desert State Park (ABDSP) and the Borrego Springs Unified School District (BSUSD). These non-BPA rights are not subject to pumping Rampdown, Carryover, or transfer (to other Parties), but are subject to all other substantive provisions of the Judgment, including paying pumping assessments based on annual pumping and the ability to purchase/lease Annual Allocation or Carryover to cover Overproduction.

(2) A negative transfer value indicates rights transferred to another Party. A positive value indicates rights transferred from another Party. Non-BPA rights cannot be transferred. Parties with Other Non-De Minimis Water Rights may receive a lease/transfer of annual allocation or Carryover to resolve Overproduction. The sum of all transfers across all Parties will always be 0.

(3) Carryover only applies to BPA rights; non-BPA rights are not eligible for Carryover. The maximum Carryover balance is two times the BPA (= 2 x BPA). Balance as of October 1, 2024 is based on the final WY 2024 water rights accounting, unless adjustments have been made and documented since publishing the prior year accounting.

(4) The balance of Overproduction as of October 1, 2024 is based on the final WY 2024 water rights accounting, unless adjustments have been made and documented since publishing the prior year accounting. Overproduction can be remedied through under-pumping of the Annual Allocation or transfers and leases of BPA/Annual Allocation/Carryover.

(5) The Annual Allocation in each WY is determined by multiplying the Party's BPA by the Pumping Percentage in effect for that WY, based on the pumping Rampdown percentage then in effect pursuant to the Judgment. For example, in WY 2025 the Pumping Percentage is 75 percent, which is a 25 percent Rampdown from BPA. Annual Allocation is rounded to the nearest whole af. The subtotal and totals across all Parties are the sum of each Party's rounded Annual Allocation value.

(6) The Rampdown applies only to BPA Parties. For BPA Parties the WY 2025 pumping allocation is 75% of BPA, rounded to the nearest whole number. For BSUSD and ABDSP, the rights are not subject to Ramp down and annual allocation is always equal to the pumping right defined in the Judgment.

(7) The total allowable pumping for the WY is the sum of the Carryover account balance (e) plus the Annual Allocation (g) plus any leased/transferred Allocation or Carryover less the total balance of Overproduction (f). Allowable (j) = (e) + (g) + (h) + (i) - (f)

(8) "Estimated (P)" values were estimated for Parties with partial year metered data (the available data was used to estimate pumping for the WY based on the data available). "Estimated" values are for Parties with no meter data available in which case the pumping was estimated based on the method used in the GMP, or using other more accurate data, if available. "na" values represent parties who are not actively pumping and have no operable wells.

(9) Pursuant to Judgment Section III.G.1 "The first Groundwater produced by a Party during any Water Year will be deemed to be an exercise of any Carryover." If (e) > 0, then (m) = minimum of [(e)+(i)] or (k)

(10) This is the balance of Overproduction incurred in WY 2025 that must be resolved by September 30, 2026 (end of WY 2026): (o) = If (k) > (e) + (g) + (h) + (i) - (f), then (k) - [(e) + (g) + (h) + (i) - (f)], otherwise 0

(11) If the Party has no Overproduction balance, then the eligible Carryover is the minimum value of (p) = (g) + (h) - [(k) - (m)] or (p) = (d) - [(e)+(i)-(m)]. Parties who are not in good standing with the Watermaster (either are not reporting pumping or have unpaid assessments) are not eligible for Carryover; in this case (p) is shown as "ne".

Other Notes:

(A) In WY 2025, T2 Tilting T, LLC acquired the BPA parcels/rights and remaining Carryover water owned by the Borrego Nazareth, LLC. To exercise the BPA rights, T2 Tilting T, LLC must intervene into the Judgment. This process is in progress with the Court. For the purpose of the water rights accounting, T2 Tilting T, LLC is shown as the transferee holding the BPA rights, though this remains subject to Court approval of the intervention.

(B) In WY 2025, T2 Borrego LLC acquired the BPA parcels/rights and remaining Carryover water owned by Bagdasarian Farms, LLC. T2 Borrego LLC is an existing Party to the Judgment. The BPA rights in this purchase remain attached to the associated BPA parcels.

**Water Year 2025 Annual Report
for the Borrego Springs Subbasin**

Table 18 provides an overview of the WY 2025 Water Rights Accounting and summarizes and aggregates the information provided in Table 17, including:

- The column title and identifier of each column of data presented in Table 17. The identifier is a letter assigned to each column to support communication of how certain values in the table are calculated.
- A description of the information reported in each column of data in Table 17 and any calculations made based on other columns of data using the column identifiers.
- Aggregate WY 2025 totals reported in Table 17 for all Parties.

Table 18. WY 2025 Water Rights Accounting Overview			
Table 17 Column Title and Identifier		Description of Information Reported in Table 17	Totals for WY 2025, including Sub-totals for BPA and Non-DeMin Parties, <i>af</i>
BPA Party or Party with Other Non-De Minimis Water Rights		This is the name of the Party with pumping rights, as listed in Exhibit 4 of the Judgment.	na
BPA or Other Non-De Minimis Rights as of Sep 30, 2024	a	This is the total BPA (or maximum pumping allotment in the case Non-De Minimis Water Rights holders) for each Party as of the end of the prior WY (WY 2024).	24,335 <i>BPA = 24,293</i> <i>Non-DeMin = 42</i>
Permanent Transfer of BPA effective in WY 2025	b	This column indicates if a Party permanently transferred BPA effective in WY 2025. A negative value indicates that a Party transferred its BPA to another Party. A positive value indicates that a Party received a transfer of BPA from another Party. Note: Non-BPA rights of Other Non-De Minimis Parties cannot be transferred.	0 (net transfer) 2,606.75 af of water was permanently transferred between BPA Parties in WY 2025.
BPA or Other Non-De Minimis Rights as of Oct 1, 2024	c	This is the total BPA for each Party as of the start of WY 2025, accounting for permanent transfers. <i>(c) = (a) + (b)</i> Note: The total amount of BPA and Non-De Minimis Rights never changes and should equal column (a) in aggregate.	24,335 <i>BPA = 24,293</i> <i>Non-DeMin = 42</i>
Maximum Allowable Carryover Account Balance	d	This is each BPA Party's maximum allowable Carryover balance. The maximum balance is two times the BPA. <i>(d) = 2 x (c)</i> . Note: The rights of Other Non-De Minimis Parties are not subject to Carryover provisions.	48,586 <i>BPA = 48,586</i> <i>Non-DeMin = na</i>
Carryover Account Balance as of Oct 1, 2024	e	This is the Carryover Account Balance available to each Party as of the start of WY 2025.	24,959.93 <i>BPA = 24,959.93</i> <i>Non-DeMin = na</i>

Table 18. WY 2025 Water Rights Accounting Overview

Table 18. WY 2025 Water Rights Accounting Overview		
Table 17 Column Title and Identifier	Description of Information Reported in Table 17	Totals for WY 2025, including Sub-totals for BPA and Non-DeMin Parties, <i>af</i>
Total Balance of Overproduction to Resolve Effective WY 2025	f This is the portion of Overproduction incurred in prior WYs that must be resolved by the end of the current WY (WY 2025) to avoid issuance of an Overproduction Penalty Assessment and includes: (1) Overproduction incurred in WYs 2021 through 2023 that did not exceed the three-year cumulative Maximum Overproduction Limit ⁶¹ , plus (2) Overproduction incurred in WY 2024.	327.54 <i>BPA = 327.54</i> <i>Non-DeMin = 0</i>
WY 2025 Annual Allocation per Rampdown	g This is the WY 2025 Pumping Allocation for each BPA Party. The WY 2025 pumping allocation is equal to 75% of BPA. ⁶² $(g) = 0.75 \times (c)$. Note: The rights of Other Non-De Minimis Parties (ABDSP and BSUSD) are not subject to Rampdown.	18,270 <i>BPA = 18,228</i> <i>Non-DeMin = 42</i>
Leased or Transferred Annual Allocation Effective in WY 2025	h This column indicates if a Party leased or transferred Annual Allocation in WY 2025. A negative value indicates that a Party transferred allocation to another Party. A positive value indicates that a Party received a transfer of Annual Allocation from another Party.	0 (none in WY 2025)
Transferred Carryover Effective in WY 2025	i This column indicates if a Party transferred Carryover in WY 2025. A negative value indicates that a Party transferred Carryover to another Party. A positive value indicates that a Party received a transfer of Carryover from another Party.	0 (net transfer) 1,475.53 <i>af</i> transferred between Parties in WY 2025.
Total Allowable Pumping for WY 2025	j This is each Party's total allowable pumping for the WY, based on the sum of Annual Allocation, Carryover Account Balance, transferred rights, and unresolved Overproduction balance. $(j) = (e) + (g) + (h) + (i) - (f)$	42,902.39 <i>BPA = 42,860.39</i> <i>Non-DeMin = 42</i>
Total Pumping in WY 2025	k This is the total pumping (metered and estimated) for WY 2025.	10,128.95 <i>BPA = 10,100.77</i> <i>Non-DeMin = 28.18</i>

⁶¹ The Judgment provides that in the first three years of operation, a Party can pump in excess of its Annual Allocation without incurring an immediate Overproduction penalty, so long as the total cumulative Overproduction in those three years does not exceed the cumulative Maximum Overproduction Limit for the three-year period.

⁶² The Rampdown schedule to the 2025 Sustainable Yield is available on the Watermasters website at: <https://borregospringswatermaster.com/wp-content/uploads/2025/11/Rampdown-Schedule-to-2025-SY.pdf>

Table 18. WY 2025 Water Rights Accounting Overview

Table 17 Column Title and Identifier	Description of Information Reported in Table 17	Totals for WY 2025, including Sub-totals for BPA and Non-DeMin Parties, <i>af</i>
WY 2025 Pumping was Metered or Estimated	<ul style="list-style-type: none"> • "Metered" values are based on metered data. • "Estimated (P)" values were estimated for parties with partial year metered data (the available data was used to estimate pumping for the WY based on the data available). • "Estimated" values are for Parties with insufficient or no meter data available, in which case the pumping was estimated based on the method used in the Watermaster's Groundwater Management Plan (GMP) or other more accurate data, if available. • "na" values represent parties who are not actively pumping and have no operable wells for which to report pumping. 	na
Carryover Pumped in WY 2025	Pursuant to Judgment Section III.G.1 "The first Groundwater produced by a Party during any WY will be deemed to be an exercise of any Carryover." <i>If (e) > 0, then (m) = minimum of [(e)+(i)] or (k)</i>	8,259.26 <i>BPA = 8,259.26</i> <i>Non-DeMin = 0</i>
Was Overproduction prior to WY 2025 Resolved?	<ul style="list-style-type: none"> • "Yes" identifies if a Party with Overproduction at the start of WY 2025 resolved their Overproduction either through: 1) purchase of Carryover or Annual Allocation (columns <i>h</i> and <i>i</i>), or 2) under-pumping their Annual Allocation (column <i>j</i>) • "na" identifies Parties with no Overproduction balance due at the start of WY 2025 and, therefore, had nothing to resolve. 	All Overproduction due by end of WY 2025 was resolved
Balance of Overproduction to Resolve by end of WY 2026	This is the amount of Overproduction incurred during WY 2025 that must be resolved by September 30, 2026 (end of WY 2026). <i>If (k) > (j), (o) = (k) - (j), otherwise 0</i>	101.64 <i>BPA = 101.64</i> <i>Non-DeMin = 0</i>
Pumping Allocation Eligible for Carryover	This is the amount of each Party's eligible for Carryover from WY 2025. Parties who are not in good standing with the Watermaster (either are not reporting pumping or have unpaid assessments) are not eligible for Carryover and are listed as "ne". <i>If no Overproduction, (p) = (g) + (h) - [(k) - (m)]</i> <i>If amount eligible > Maximum Allowable Carryover (see column d), (p) = (d) - [(e) + (i) - (m)]</i>	13,807.08 <i>BPA = 13,807.08</i> <i>Non-DeMin = na</i>
Carryover Election by Party	This is the amount of Carryover elected. If Staff was not contacted by a Party prior to the October 31, 2025 reporting deadline, Carryover was assumed to not be elected.	8,635.97 <i>BPA = 8,635.97</i> <i>Non-DeMin = na</i>

Table 18. WY 2025 Water Rights Accounting Overview

Table 17 Column Title and Identifier		Description of Information Reported in Table 17	Totals for WY 2025, including Sub-totals for BPA and Non-DeMin Parties, <i>af</i>
Carryover Account Balance as of Oct 1, 2025	r	This is the new Carryover Account balance after election of eligible Carryover. $(r) = (e) + (i) - (m) + (q)$	25,050.16 <i>BPA = 25,050.16</i> <i>Non-DeMin = na</i>
Adjusted Pumping Calculation	s	This is the portion of “pumping” used to calculate the WY 2026 pumping assessment rate, pursuant to the formula in Judgment Section IV.E.4. The Adjusted Pumping Calculation accounts for water pumped in the current water year, use of Carryover that was paid for prior WYs, new Carryover Elections, and leases/transfers of Annual Allocation. $(s) = (k) - (m) - (h) + (q)$	10,505.66 <i>BPA = 10,477.48</i> <i>Non-DeMin = 28.18</i>

Notable conclusions from the Water Rights Accounting for WY 2025 include:

- The total pumping by all Parties in WY 2025 was about 45 percent less than the Annual Allocation of 18,270 af, which is based on a 25 percent Rampdown of BPA. Thus, the reduction in pumping continues to be significantly ahead of the Rampdown schedule.
- Purchase of available Carryover decreased relative to prior years. In WY 2025, Parties elected to purchase 63 percent of eligible Carryover, compared to the 82 percent of eligible Carryover elected by Parties in WY 2024. As of the end of WY 2025, 52 percent of the maximum allowable Carryover was held by the BPA Parties.

4.4 WY 2026 Pumping Assessments

4.4.1 Pumping Assessment Rate

The uniform pumping assessment is calculated based on the total of all Parties’ Adjusted Pumping Calculations as follows:

$$\begin{aligned} & \text{Total Watermaster Assessment for WY (\$)} \\ & \div \text{Total Adjusted Pumping (af)} \\ \hline \hline & = \text{Pumping Assessment Rate (\$/af)} \end{aligned}$$

The final Pumping Assessment of each Party is then computed as follows:

$$\begin{aligned} & \text{Adjusted Pumping Calculation (af)} \\ & \times \text{Pumping Assessment Rate (\$/af)} \\ \hline \hline & = \text{Pumping Assessment (\$)} \end{aligned}$$

The final Pumping Assessment Rate for WY 2026, based on the approved WY 2026 Budget (see Section 2.9.3 of this Report) and the WY 2025 Adjusted Pumping Calculations is:

$$\begin{array}{r} \$350,000 \\ \div 10,505.66 \text{ af} \\ \hline = \$33.32/\text{af} \end{array}$$

4.4.2 Overproduction Penalty Assessments

The Judgment provides the Watermaster the authority to establish penalty assessments for Overproduction in accordance with the definitions described in Section 4.1. Pursuant to Section III.G.4 of the Judgment, the Watermaster annually establishes the Overproduction Penalty Assessment rate, which may not be less than \$500 per af of Overproduction. As part of the approval of the WY 2026 Budget, the Watermaster established the Overproduction Penalty Assessment rate at \$500 per af of Overproduction for any Party that does not remedy Overproduction in excess of the Maximum Overproduction Limit as of the completion of Water Rights Accounting for WY 2025.

As described in Section 4.3, and shown in Table 17, all Overproduction required to be remedied by the end of WY 2025 was resolved. Thus, no Overproduction Penalty Assessments were issued in WY 2025.

5.0 BORREGO SPRINGS SUBBASIN HYDROGEOLOGIC CONDITIONS

5.1 Basin Setting

The Basin is defined as DWR Basin No. 7.024.01: the Borrego Springs Groundwater Subbasin (see location on Figure 1). The Basin has a surface area of approximately 98 square miles (62,776 acres). The western and southwestern boundaries of the Basin are defined by the contact of poorly to moderately consolidated sediments with the plutonic and metamorphic basement of Pinyon Ridge and the San Ysidro Mountains. The northern and eastern boundaries are defined by the mapped trace of the Coyote Creek fault that trends northwest-southeast. East of the Coyote Creek fault lies Coyote Mountain, the Borrego Badlands, and the Ocotillo-Clark Valley Groundwater Basin. The southeastern boundary of the Basin is defined by the location of San Felipe Creek, as mapped by the USGS National Hydrography Dataset, which also marks the northern boundary of the Ocotillo Wells Groundwater Subbasin (DWR Basin No. 7.024.02).

The Basin consists primarily of private land under County jurisdiction, which is surrounded on nearly all sides by land owned by the State of California – the ABDSP. Within the Basin, most of the land is undeveloped. The developed land uses include residential, agricultural, recreational (including golf courses), transportation infrastructure, and commercial uses. The sole municipal water district is the BWD, which provides water and sewer service to the developed portions of Borrego Valley within its service area. The sole mutual water company is the Borrego Air Ranch Mutual Water & Improvement Co., which provides water service to lots within its boundary.

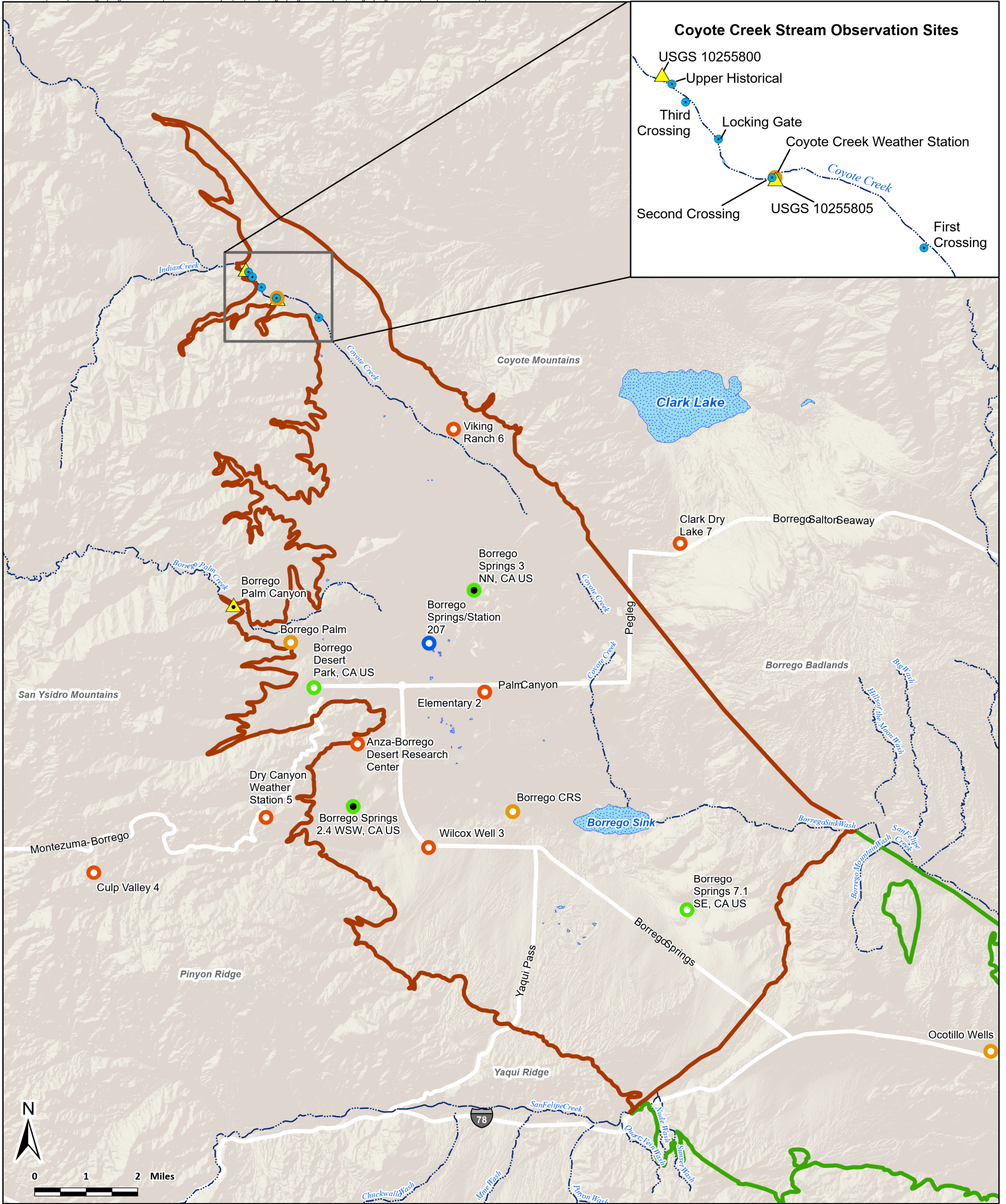
Groundwater from the Basin is the sole source of water supply within the area. Groundwater is pumped for municipal supply; irrigation of agriculture, golf courses, and other recreational landscapes; and private domestic or commercial supply. Over a 65-year period prior to the development of the GMP, groundwater levels declined as much as 126 feet due to groundwater pumping in excesses of average annual recharge. An estimated 520,000 af of water was removed from storage over this period. These conditions prompted the DWR to designate the Basin as critically overdrafted and of high priority for groundwater management.

The hydrostratigraphy of the Basin has been divided into upper, middle, and lower aquifers. The differentiation between the three aquifers is based on a textural analysis of borehole lithologic logs and geophysical logs. The aquifer-system sediments consist of unconsolidated to poorly-consolidated, interbedded mixtures of gravel, sand, silt, and clay. As there are no regionally extensive aquitards (i.e., a laterally continuous thick clay layers), the upper aquifer behaves in a predominantly unconfined manner, and the middle and lower aquifers exhibit leaky-confined or semi-confined characteristics based on limited aquifer testing. The lower aquifer is the most fine-grained unit, containing higher percentages of silt and clay. For the calculation of change in groundwater storage pursuant to CCR Article 7, Section 356.2, the three aquifers are considered to be a single unconfined aquifer.

A detailed description of the institutional setting, hydrogeology, and historical conditions within the Basin is included in Chapter 2 of the GMP (Dudek, 2020a).

5.2 Climate

Figure 4 shows the location of climate monitoring stations in and around the Basin that measure and record precipitation, temperature, and/or ET data for the Plan Area. Each data type is described in the sections below.



Surface-Water Monitoring Sites

- ▲ USGS Inactive Streamgages
- ▲ USGS Active Streamgage
- Coyote Creek Stream Observation Sites

Weather Stations

- California Irrigation Management Information System Station
- National Climatic Data Center Station (black fill denotes inactive stations)
- San Diego County Flood Control Station
- U.C. Irvine Station

Borrego Valley Groundwater Basin Subbasins

- Borrego Springs Groundwater Subbasin (7-024.01)
- Ocotillo Wells Groundwater Subbasin (7-024.02)

Surface Water Features

- Stream Channel
- Dry Lake



Prepared by:



Figure 4

Atmospheric and Surface-Water Monitoring Stations

Borrego Springs Watermaster
Borrego Springs Subbasin
2025 Annual Report

5.2.1 Precipitation

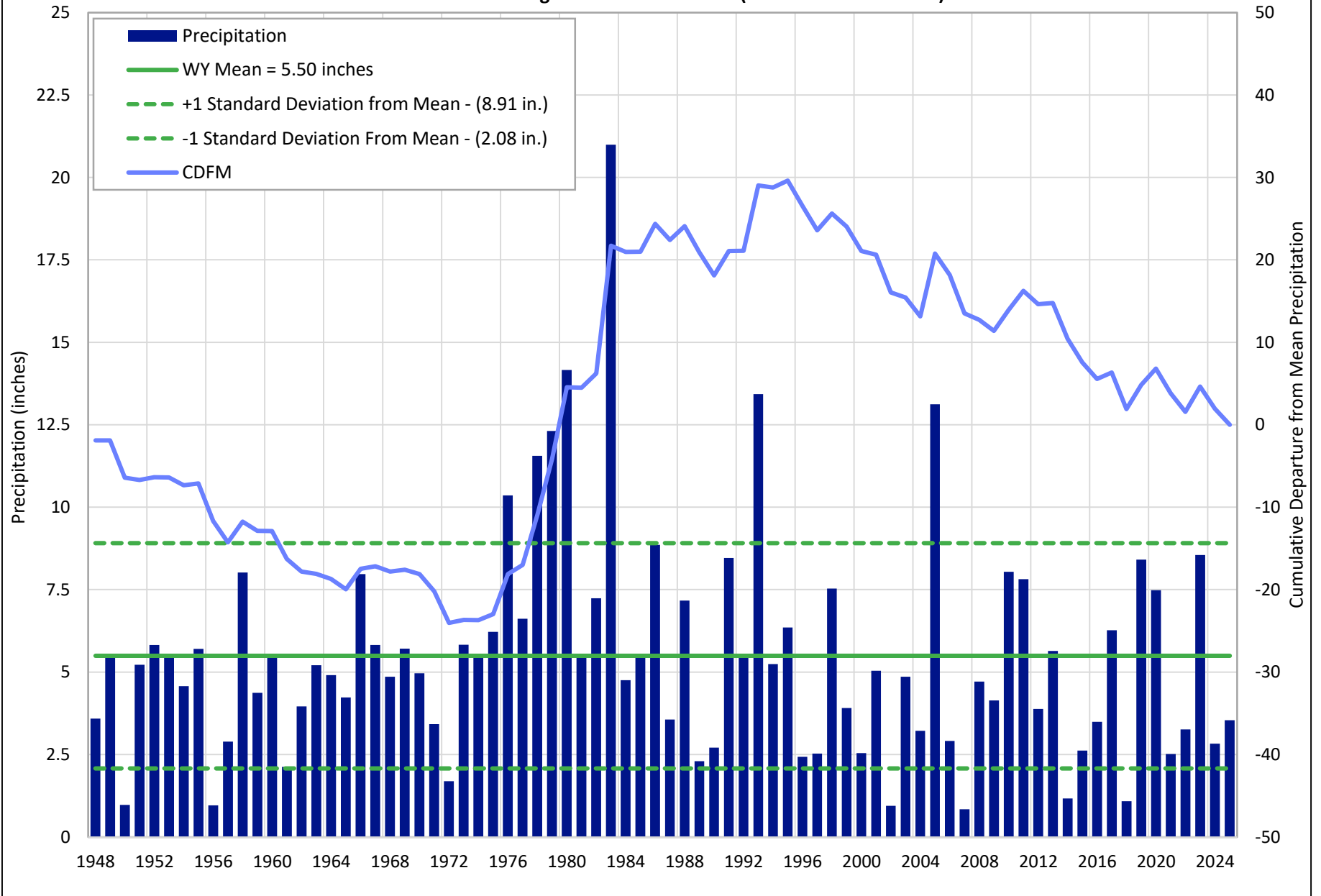
Average annual precipitation is variable across the Basin, ranging from up to eight inches per year along the northwest edge of the valley to less than four inches per year to the southeast. Precipitation is greater outside the Basin in the mountains to the west, north, and northeast of the Borrego Valley. Precipitation patterns are influenced by two distinct hydrologic mechanisms. The first is the Pacific frontal systems that bring regional rain bands to Southern California, typically between October and April. The second is the isolated and scattered thunderstorms that occur when moisture from the Gulf of California travels from south to north across the Basin. This phenomenon, commonly referred to as the “monsoon season,” is strongest in the summer months, but is not a regular or consistent occurrence. Occasionally, the decaying remnants of former tropical storms or hurricanes can pass through the area and, in some years, will increase precipitation totals during the monsoon season. As a result of these disparate mechanisms, the precipitation record is highly variable both seasonally and annually. For example, one storm can drop half of the yearly rainfall in an otherwise dry season. To characterize the WY type in the Basin as “wet,” “normal,” or “dry,” the standard deviation from mean precipitation is used.

The weather station with the longest and most complete precipitation record is the Borrego Desert Park Station maintained by the National Oceanic and Atmospheric Administration’s (NOAA) National Climatic Data Center⁶³ (see location on Figure 4). The station has complete water-year records from WY 1948 to present (77 years). The mean WY precipitation for this period is approximately 5.50 inches and the standard deviation from the mean is 3.42 inches. Years with precipitation within one standard deviation of the long-term average precipitation are defined as “normal” (e.g., between 2.08 to 8.91 inches); years with above “normal” precipitation are considered “wet;” years with below “normal” precipitation are considered “dry.”

Figure 5 is a plot of the WY precipitation totals, the long-term mean and standard deviation from the mean, and the cumulative departure from mean (CDFM) precipitation for WYs 1948 to 2025. The CDFM plot is a useful way to characterize the occurrence and magnitude of wet and dry periods (relative to the mean): positive sloping segments (trending upward from left to right) indicate wet periods, and negative sloping segments (trending downward from left to right) indicate dry periods. Precipitation in WY 2025 was 3.54 inches, which is 1.96 inches less than the mean for the period of record. Based on the standard deviation from the mean, WY 2025 was a “normal” year. As shown by the CDFM curve on Figure 5, the region has been experiencing a nearly 30-year dry period since 1993, punctuated by a few wet years.

⁶³ NOAA, 2025. Station: Borrego Desert Park, Network ID - [GHCND: USC00040983](https://www.noaa.gov/data/observations-and-stations/stations/USC00040983).

**Figure 5. Time History of Annual Precipitation and Cumulative Departure From Mean
Borrego Desert Park Station (GHCND:USC00040983)**



5.2.2 Temperature and Evapotranspiration

The climate of the Borrego Valley is arid with hot summers and cool winters. Based on the Borrego Desert Park Station, which has a nearly complete daily temperature record since 1968, the long-term mean annual daytime high temperature is 87.9°F, ranging from 61.1°F in January (1979) to 112.2°F in July (2024). The mean annual nighttime low temperature is 59.0°F, ranging from 38.2°F in December (1990) to 82.7°F in July (2024).

In WY 2025, the average daytime high temperature was 88.1°F and the average nighttime low was 61.8°F. The maximum average monthly daytime high temperature was 107.2°F in August 2025 and the minimum average monthly nighttime low temperature was 44.8°F in January 2025.

According to the *State of California Reference Evapotranspiration Map* developed by California Irrigation Management Information System (CIMIS), the Basin is located within ET Zone 18, with an annual average reference evapotranspiration (ET_o) of 71.6 inches or 5.97 feet, which is typical compared to other California desert environments⁶⁴ (DWR, 2012). The ET_o in the Basin is obtained from CIMIS Station 207 (see location on Figure 4). The ET_o values calculated from the CIMIS data reflect the amount of water that could be transpired by grass or alfalfa if supplied by irrigation. The ET_o values do not represent the actual transpiration from any specific crop or native vegetation. To estimate the ET rate for a specific crop or vegetation type, the ET_o can be multiplied by a crop coefficient that adjusts the water consumption for that crop relative to the water consumption for alfalfa.

CIMIS Station 207 has nearly complete annual records of daily data since January 2010. The monthly and annual totals are shown in Table 19. The mean annual ET_o measured at CIMIS Station 207 between WY 2010 and WY 2025 was 67.61 inches per year (5.63 feet per year). In WY 2025, the total ET_o was 67.24 inches (5.60 feet) (CIMIS, 2025).

⁶⁴ A study comparing ET_o across different desert environments in California calculated the average annual ET_o to range from approximately 5.46 ft/yr to 7.28 ft/yr depending on the method used to calculate ET (Abd El-Wahed and Snyder, 2015). Available at: https://www.researchgate.net/profile/Mohamed-Abd-El-wahed/publication/276150597_Calculating_Sunshine_Hours_and_Reference_Evapotranspiration_in_Arid_Regions_When_Solar_Radiation_Data_are_Limited/links/5a350e5e45851532e82f0ca1/Calculating-Sunshine-Hours-and-Reference-Evapotranspiration-in-Arid-Regions-When-Solar-Radiation-Data-are-Limited.pdf.

Table 19. Monthly and Water Year Reference Evapotranspiration (ETo) Totals for CIMIS Station No. 207: WY 2010 - 2025 (inches, except where noted)

Water Year	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Water Year Total
2010	5.00	3.08	1.96	2.41	3.21	8.81	9.84	8.58	9.22	9.51	9.11	7.44	78.17
2011	4.36	2.88	1.98	2.68	3.35	5.55	7.12	8.77	8.23	7.98	8.47	6.43	67.8
2012	4.92	2.72	2.11	2.82	3.56	5.33	6.77	7.66	9.47	8.77	8.04	7.09	69.26
2013	5.04	3.20	2.23	2.54	3.57	5.75	7.56	8.64	9.02	8.01	7.57	6.46	69.59
2014	5.05	3.00	2.27	2.67	3.66	5.94	7.23	8.66	9.72	9.24	8.38	6.97	72.79
2015	4.70	3.14	1.58	2.17	3.54	5.83	7.23	7.95	8.52	8.76	8.74	6.55	68.71
2016	5.16	3.35	2.43	2.42	4.15	6.35	7.44	8.97	9.79	10.17	8.91	6.51	75.65
2017	5.17	3.37	1.99	2.33	3.28	6.27	8.18	9.14	10.20	9.70	9.43	6.99	76.05
2018	5.38	3.16	2.47	2.75	3.46	5.43	7.66	8.63	9.13	8.65	8.00	6.48	71.2
2019	4.20	2.96	1.65	2.00	2.38	4.68	6.56	6.82	7.61	8.19	7.67	6.10	60.82
2020	4.60	2.94	2.21	2.38	3.66	4.27	5.93	8.19	7.97	8.67	7.80	6.66	65.28
2021	4.81	2.96	2.04	2.29	3.19	4.86	6.59	7.90	8.03	7.97	7.43	6.31	64.38
2022^a	4.11	3.08	1.86	2.37	3.44	5.30	6.59	7.41	7.73	7.53	5.25	0.00	54.67
2023	2.85	2.65	1.72	2.22	2.80	4.39	6.70	7.78	7.44	7.82	6.90	4.76	58.03
2024	4.11	2.75	1.83	2.09	2.62	4.14	6.31	7.73	8.18	8.45	7.78	6.18	62.17
2025	4.76	2.81	2.16	2.76	3.77	5.71	7.22	8.27	8.28	8.39	7.85	5.26	67.24
15-Year Average, inches	4.64	3.00	2.03	2.43	3.35	5.54	7.18	8.19	8.66	8.61	7.96	6.01	67.61
15-Year Average, feet	0.39	0.25	0.17	0.20	0.28	0.46	0.60	0.68	0.72	0.72	0.66	0.50	5.63

Source: CIMIS 2025 – Station No. 207 (<https://cimis.water.ca.gov/>)

(a) Values reported for 2022 were downloaded from CIMIS daily data and compiled on 12/30/2022. CIMIS reports 0 in. ET for September 2022.

5.3 Surface Water

The Coyote Creek Watershed, which drains the Santa Rosa Mountains to the north of the Basin, provides most of the recharge to the Basin through streamflow infiltration into the shallow alluvial sediments. Figure 4 shows the location of historical and current surface-water monitoring stations. There are two inactive USGS stream gages located along Coyote Creek at the northernmost boundary of the Basin. USGS Station Number 10255800 recorded daily discharge data from 1950-1983. During this period, mean annual stream discharge was about 1,831 afy (USGS, 2023a). USGS Station Number 10255805 recorded daily discharge data from 1983–1993. During this period, mean annual stream flow was about 1,774 afy (USGS, 2023b).

There is one drainage entering the Basin that is actively monitored with a USGS stream gage: Station Number 10255810, which is located in Borrego Palm Canyon downstream of the palm oasis (USGS, 2025). This stream gage has a period of record dating back to 1950, with a data gap from 2004 through 2014. Daily data are available from 1950 to 2003 and sub-daily data (15 minute) from 2015 to 2025. Surface-water discharge at Station Number 10255810 is generally low over the period of record, with most of the discharge following precipitation events and thunderstorms, typically in the winter and spring months.

Figure 6a is a chart of the daily discharge measured at the Borrego Palm Canyon USGS stream gage for the period of record. The maximum daily mean discharge was 277 cubic feet per second (cfs), which occurred on August 16, 1979. In WY 2025, stream flow was present from February to May 2025, with daily mean discharge ranging from 0.02 to 3.33 cfs on days when flow was recorded. The largest discharge event of 3.33 cfs occurred on March 13, 2025.

Figure 6b is a chart of the total annual stream discharge for the period of record in af. Annual stream discharge (for years with data) averaged 656 afy, ranging from 6.6 af in WY 1972 to 5,526 af in WY 1980. The total annual stream discharge measured at the Borrego Palm Canyon station for WY 2025 was about 69 af (USGS, 2025).

Figure 6a. USGS 10255810 Borrego Palm Canyon Stream Flow, 1950 to 2025

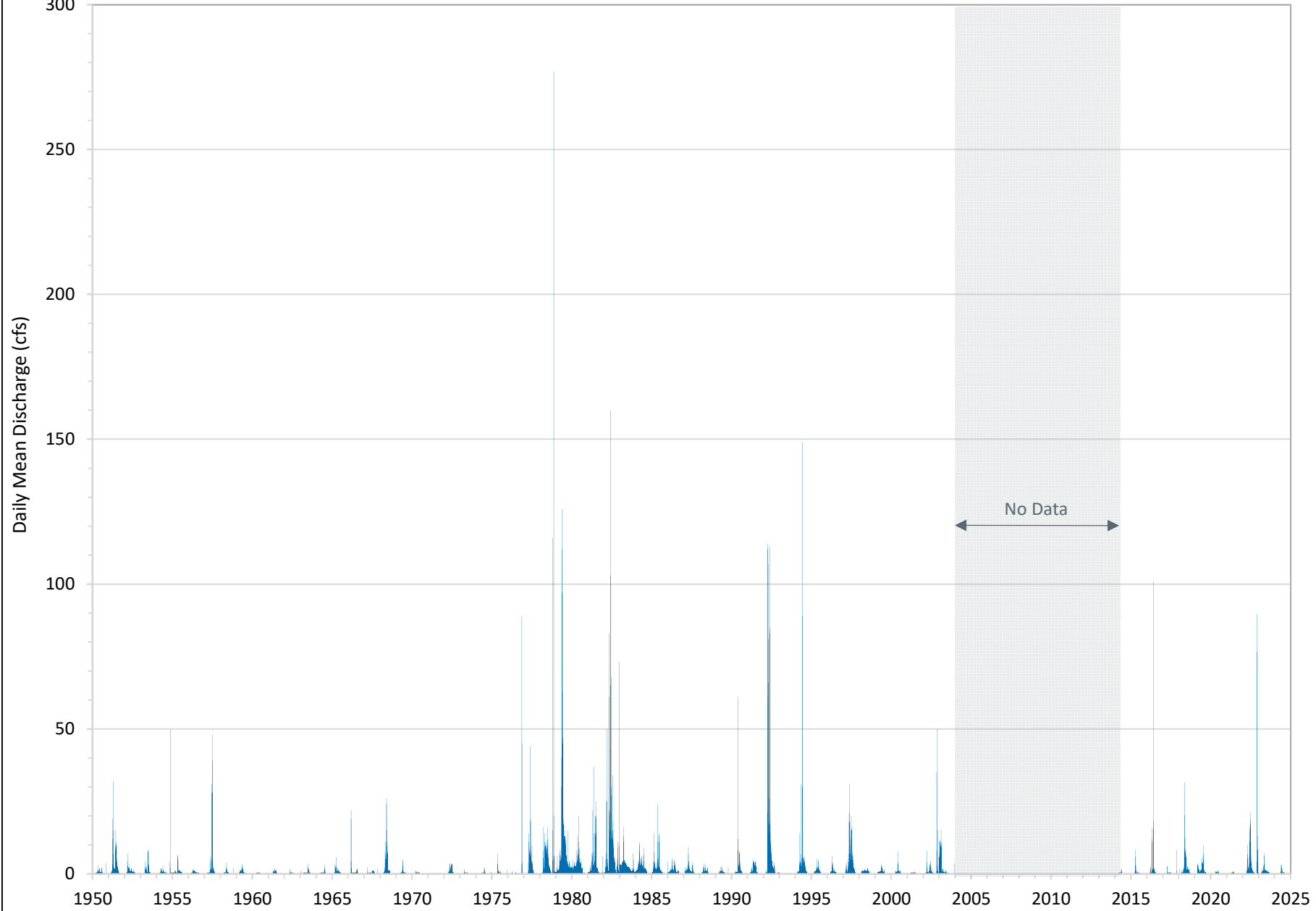
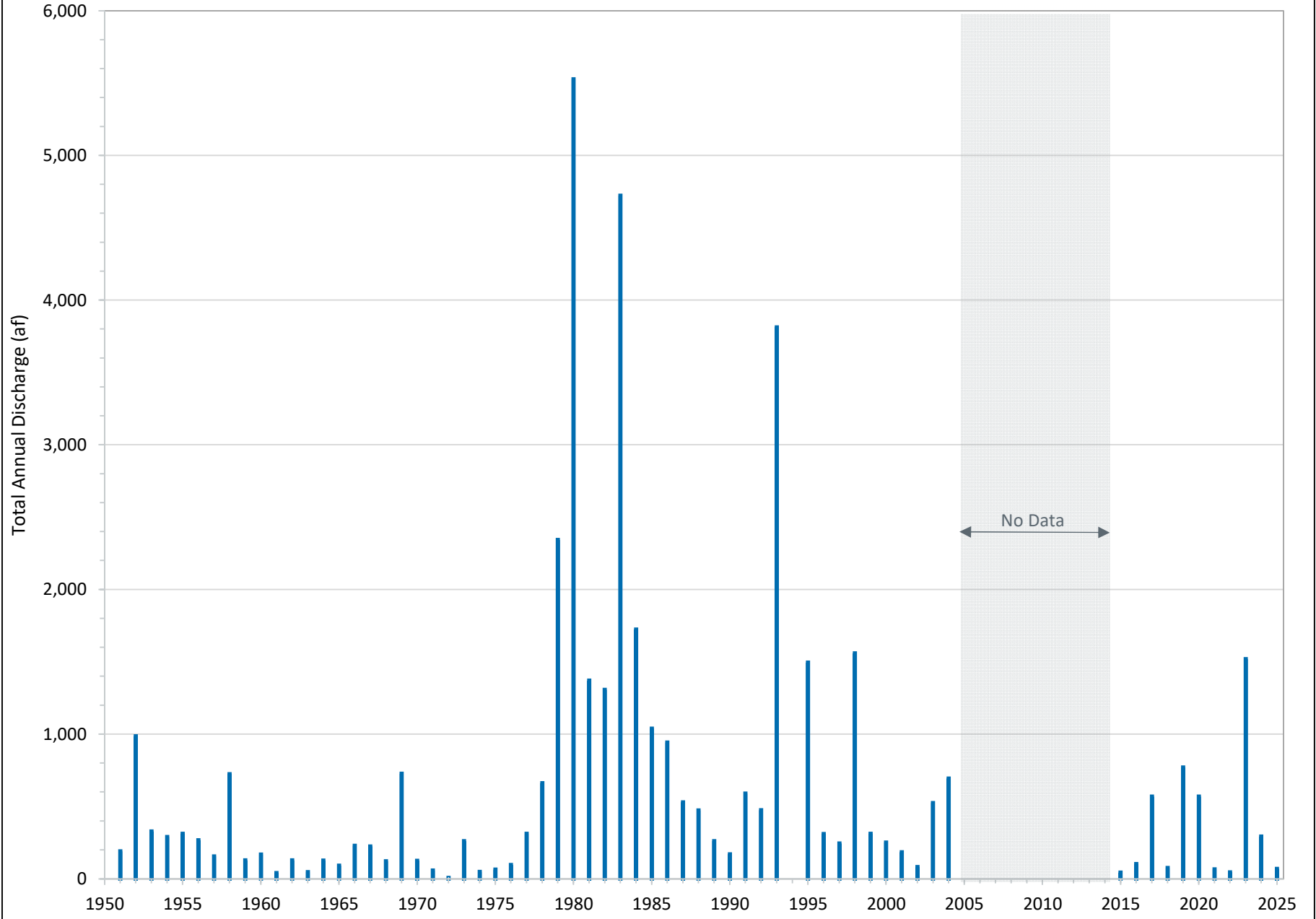


Figure 6b. USGS 10255810 Borrego Palm Canyon Total Annual Stream Discharge, 1950 to 2025



5.4 Water Use

5.4.1 Groundwater Pumping

DWR requires reporting of groundwater pumping, by use type. Groundwater is pumped from the Basin for use by the following sectors:

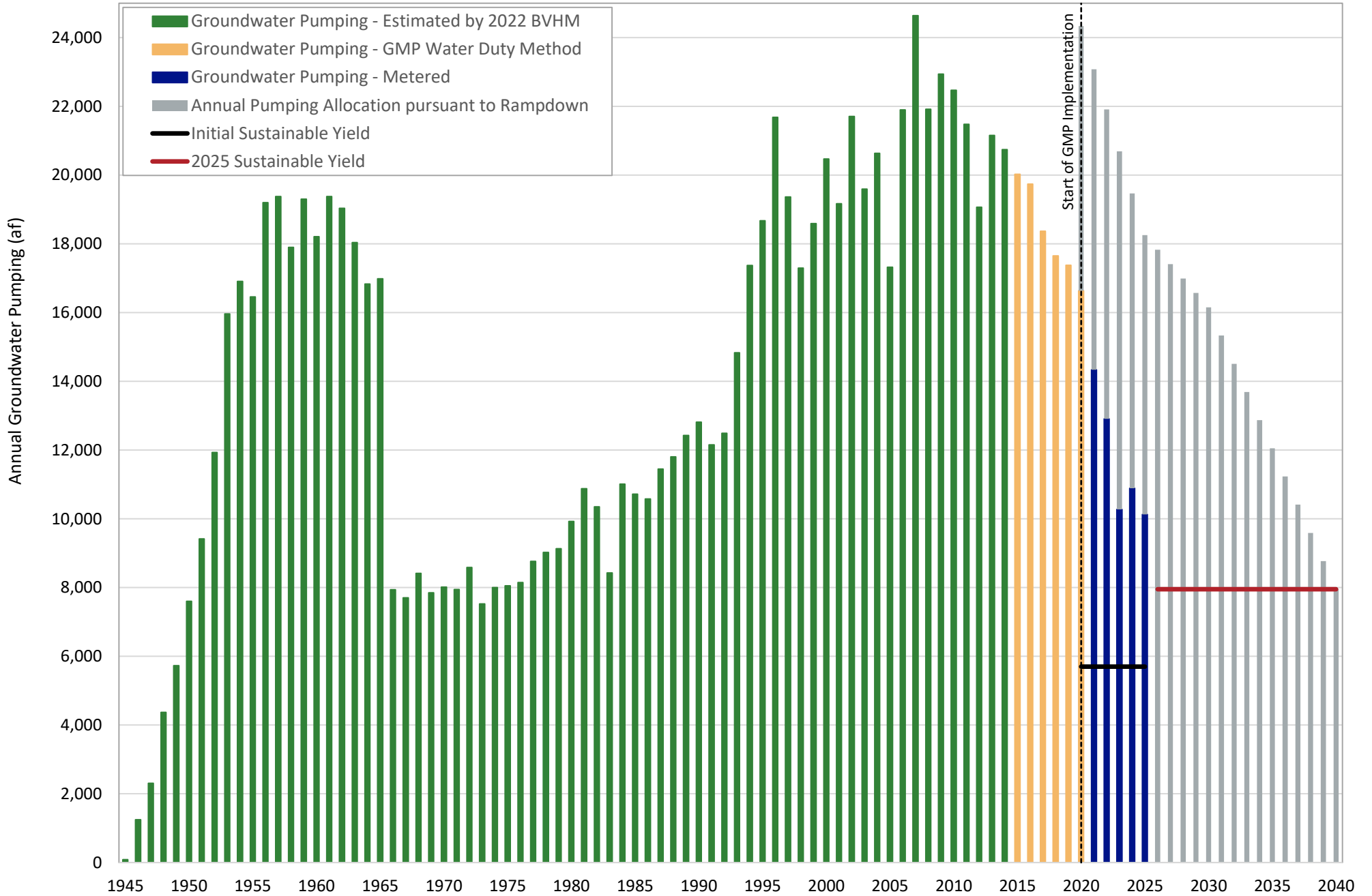
- **Agriculture.** Agricultural pumping serves a variety of crop types including citrus, palms, date palms, and nurseries. The majority of groundwater pumped from the Basin by the Agriculture sector is used for crop irrigation.
- **Recreational.** Recreational pumping is used to irrigate golf courses, including: De Anza Country Club, Rams Hill Country Club, Road Runner Golf and Country Club, and The Springs at Borrego RV Resort and Golf Course.
- **Municipal.** Municipal pumping is performed by the BWD and served to its customers for drinking water (potable) and other non-potable uses.
- **Other Non-De Minimis.** Other non-De Minimis users are those BPA Parties that do not fall into the Agriculture, Recreational, or Municipal categories.
- **De Minimis.** Private groundwater pumpers who extract less than two afy for use on their real property overlying the Basin are considered De Minimis pumpers under the Judgment. Well users are generally considered to be De Minimis unless their properties contain irrigated areas more than about 0.5 acres, which could result in use of more than two afy of water. During the development of the GMP, it was estimated there were 53 De Minimis pumpers in the Basin.

Figure 7 is a time-series chart of historical groundwater pumping in the Basin from 1945 through 2025. The chart is divided into two parts to facilitate the comparison of groundwater pumping to the Rampdown:

1. Groundwater pumping that occurred prior to GMP implementation (1945-2019)
2. Groundwater pumping that occurred during GMP implementation (2020-2025)

The subsections below describe: (i) the methods that have been used to estimate groundwater pumping; (ii) total groundwater pumping for WY 2025 by sector; and (iii) a comparison of annual groundwater pumping during GMP implementation (2020-2025) to the Rampdown schedule in the Judgment.

Figure 7. History of Groundwater Pumping Compared to Rampdown Schedule



5.4.1.1 Methods for Estimating Groundwater Pumping

The following methods have been used to estimate groundwater pumping in the Basin:

1. **Model-Estimated.** The 2022 BVHM⁶⁵ simulates historical groundwater pumping as a component of the water budget for the period of WY 1945-2022. The majority of historical pumping was un-metered agricultural pumping and is simulated using the Farm Process (FMP). Other metered pumping, primarily municipal, is assigned in the BVHM through the multi-node well (MNW2) package.
2. **Water Duty Method.** To support the development of the GMP and updates to the Judgment filings, un-metered pumping was estimated using a water duty method for the period of 2015 to 2020.⁶⁶ The water duty method estimated un-metered pumping based on crop-specific water-use factors defined in the GMP (Dudek, 2020a) and the most current information on the irrigated area and crop type of each pumper based on an aerial imagery analysis.
3. **Meter Data.** Prior to WY 2021, meter data was available at a small number of wells. Since WY 2021, most of the pumping by BPA Parties has been metered and reported to the Watermaster on a monthly basis (refer to Section 3.1.1).⁶⁷
4. **De Minimis Pumping.** There are an estimated 53 active De Minimis pumpers within the Basin—each assumed to pump 0.5 afy (Dudek, 2020b). Therefore, De Minimis pumping in the Basin is estimated to be approximately 26.5 afy.

On Figure 7, the pumping totals shown through WY 2025 are comprised of the following methods:

- WY 1945 to 2014 (symbolized as dark green bars): 2022 BVHM model-estimated pumping.
- WY 2015 to 2020 (symbolized as orange bars): Water duty estimates (majority), plus limited meter data, plus De Minimis pumping estimates.
- WY 2021 to 2025 (symbolized as dark blue bars): Meter data (majority), plus water duty estimates, plus De Minimis estimates.

5.4.1.2 Comparison of Groundwater Pumping to the Rampdown

In addition to presenting historical groundwater pumping, Figure 7 shows the Annual Allocation pursuant to the Rampdown to the 2025 Sustainable Yield of 7,952 afy. The Annual Allocation is symbolized as grey bars. Comparing the dark blue and grey bars for WY 2021 through WY 2025 shows that annual pumping has been less than the Annual Allocation. As discussed in Section 4, a portion of the unpumped water is eligible to be purchased as Carryover for pumping in future years (though not all Parties elect to purchase Carryover).

⁶⁵ The historical pumping record reported in prior Annual Reports was based on results from the 2016 BVHM. As part of the redetermination of the 2025 Sustainable Yield, the BVHM was extended, updated, and recalibrated, resulting in a revised historical pumping record (See Section 3.4.1). The revised pumping history from the 2022 BVHM supersedes results from the 2016 BVHM and is reported in the WY 2025 Annual Report for the period of WY 1945 through 2014.

⁶⁶ In select cases, pumping records were available and provided by non-De Minimis users to support the estimate of groundwater pumping during GMP development.

⁶⁷ The Judgment was entered on April 8, 2021. The non-Settling Parties were not required to meter wells until after entry of the Judgment, thus most did not have a full year of metered data for WY 2021. Where metered data were not available for a Party, the water duty methodology used in the GMP was applied to estimate pumping. By WY 2022, the majority of Parties were metered and had a full year of metered data. In WY 2025, all but one Party well was metered (see Table 17).

5.4.1.3 Groundwater Pumping in WY 2025

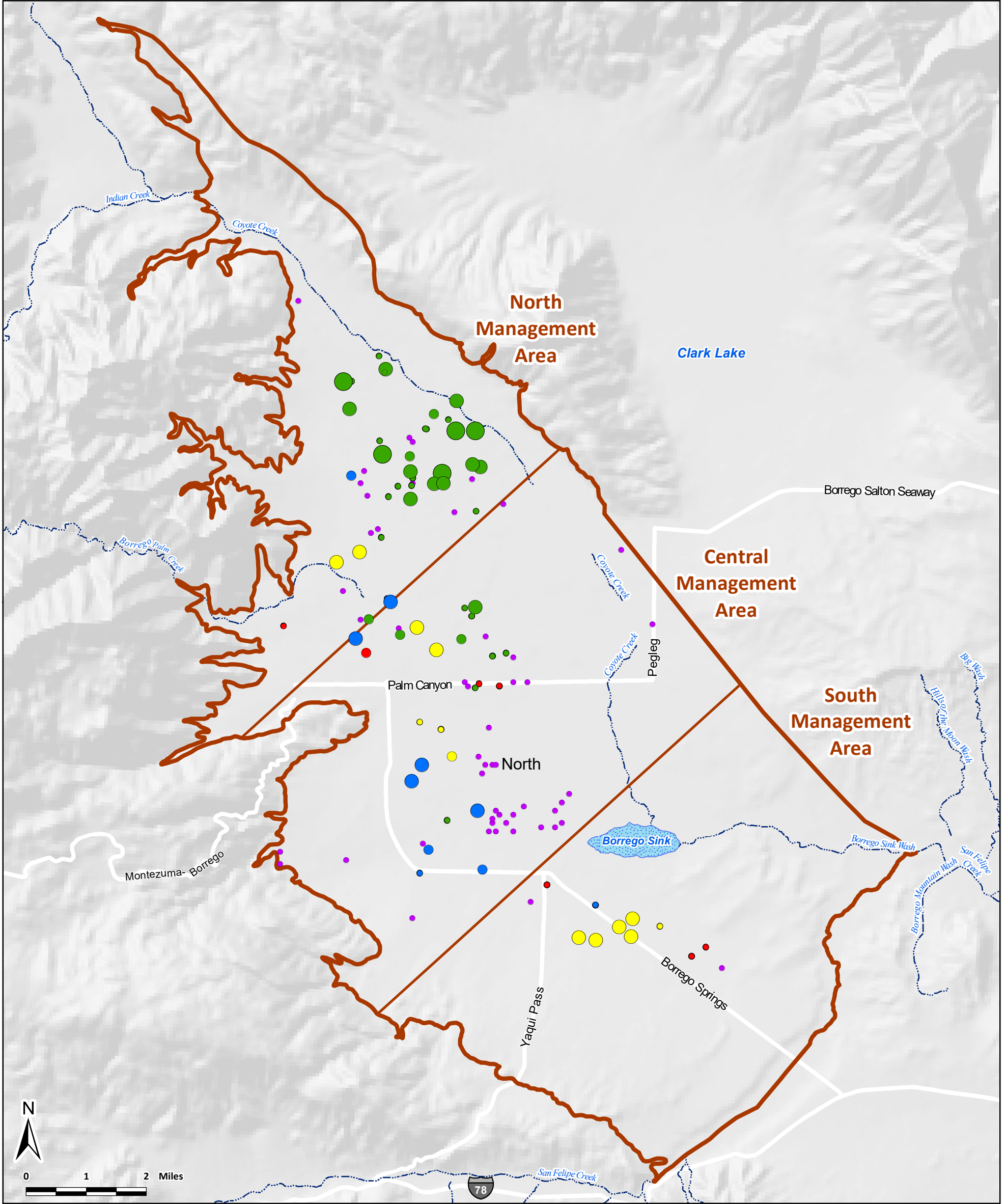
Total pumping in WY 2025 was about 10,155 af.⁶⁸ The following figures and tables characterize the pumping that occurred in WY 2025:

- Figure 8 shows the location of each pumping well in the Basin for WY 2025. Each well is symbolized by sector and magnitude of pumping in WY 2025.
- Figure 9 is a time-series chart of annual groundwater pumping, by sector, for WYs 2015 through 2025.
- Table 20 summarizes annual groundwater pumping in the Basin, by sector, for WYs 2015 through 2025.

The following observations are made through inspection of these data graphics:

- Total annual groundwater pumping has generally been decreasing.
 - From WY 2015 to WY 2025, since the passage of SGMA, pumping declined from about 20,028 af to about 10,155 af (a decrease of 9,872 af, or approximately 49 percent).
 - Groundwater pumping in WY 2025 was 4,210 af (or approximately 29 percent) less than pumping in WY 2021, the start of GMP implementation, when metered pumping data is available.
 - In WY 2025, pumping decreased by approximately 7 percent (763 af) compared to WY 2024.
 - It should be noted that pumping estimates for WY 2021 through 2025 are based primarily on metered data and are not directly comparable to the WY pumping estimates from WY 2015 to WY 2020 that were primarily estimated by the water duty method. That said, it would not be correct to assume that the improvement in monitoring is solely driving the significant decrease in pumping. The decrease in pumping can be attributed taking farmland out of production, improvements in irrigation efficiency, and possibly the wet conditions periodically experienced since WY 2020. The relative contribution of each of these drivers has not been quantified or assessed.
- The agriculture sector continued to pump most of the groundwater from the Basin in WY 2025. The majority of the reduction in pumping from WY 2015 to WY 2025 was from the agriculture sector, accounting for about 8,722 af of the reduction. This is reflective of the above noted changes of taking farmland out of production and improvements in irrigation efficiency.
- Reductions in pumping in the recreational and municipal sectors reflect the proactive conservation and efficiency measures implemented by Pumpers in the Basin, such as:
 - Municipal Advanced Metering Infrastructure (AMI) metering of all BWD connections to identify leaks and improve indoor and outdoor water use efficiency.
 - Improved efficiencies by recreational uses, such as turf replacement at the Rams Hill and de Anza Desert Club golf courses, improved irrigation scheduling, and use of soil moisture probes to optimize the timing of irrigation.

⁶⁸ The WY 2025 pumping amount shown in Table 20 is slightly larger than reported in Section 4.3, by 26.5 af, because the Water Rights Accounting does not consider De Minimis pumping.



Groundwater Extractions in 2025 by Sector (af)

Extraction Amount Represented by Symbol Size and Sector Represented by Symbol Color

- | | |
|--------------|-----------------------|
| ● 0 - 25 | ● Agriculture |
| ● 25 - 100 | ● Recreation |
| ● 100 - 500 | ● Municipal |
| ● 500 - 1000 | ● Other Non-Deminimis |
| | ● De Minimis |

Other Features

- Borrego Springs Subbasin with Management Area Divisions

Surface Water Features

- Stream Channel
- Dry Lake



Figure 8

Groundwater Extractions by Sector (WY 2025)

Borrego Springs Watermaster
Borrego Springs Subbasin
2025 Annual Report

Prepared by:



Figure 9. Annual Groundwater Pumping by Sector – 2015 to 2025

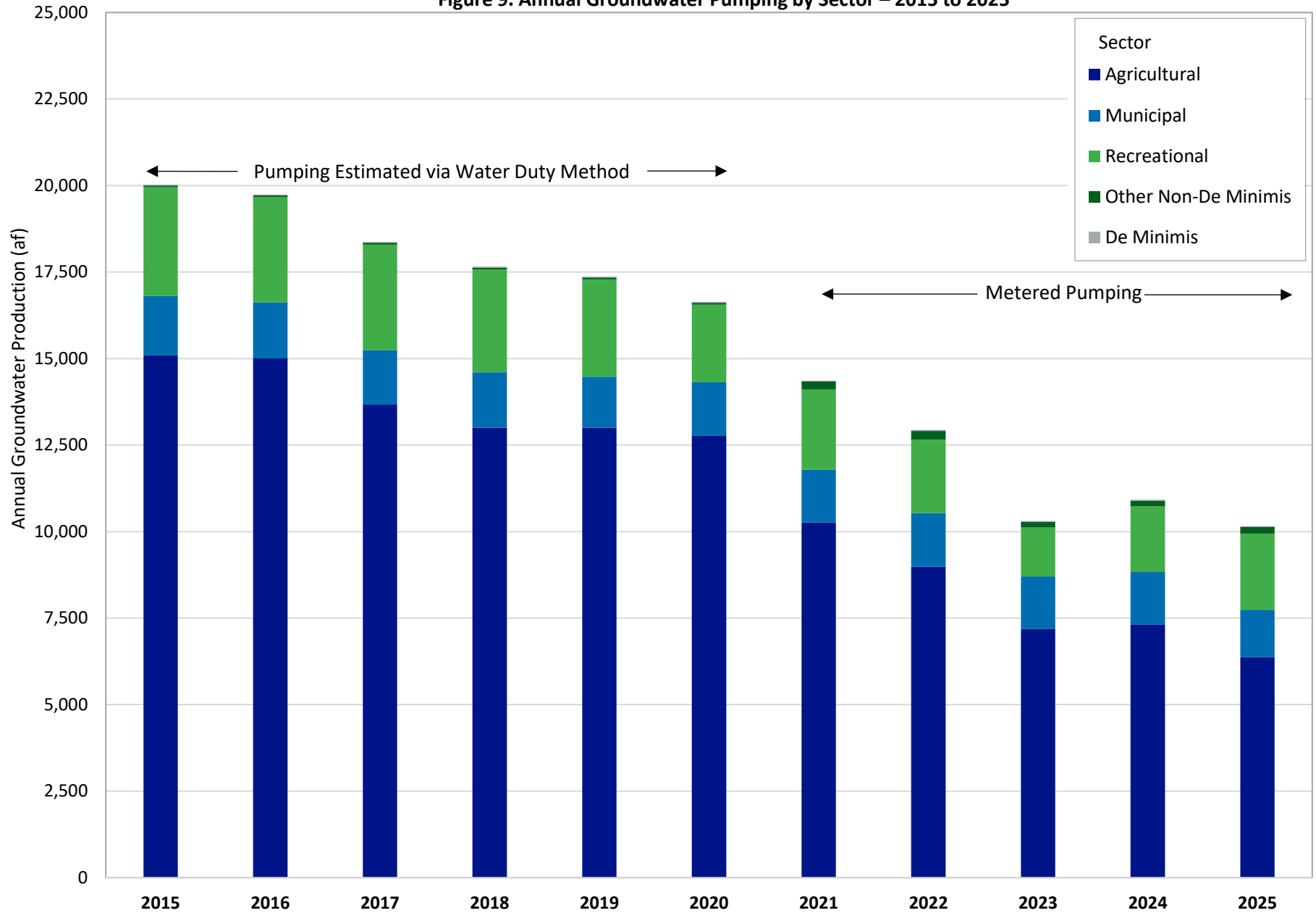


Table 20. Groundwater Pumping by Sector - 2015 to 2025

Groundwater User Type	Annual Groundwater Extraction, acre-feet										
	2015 ^(a)	2016 ^(a)	2017 ^(a)	2018 ^(a)	2019 ^(b)	2020 ^(c)	2021 ^(d)	2022 ^(d)	2023 ^(d)	2024 ^{(d),(e)}	2025 ^{(d),(e)}
Agricultural	15,093.73	15,007.35	13,668.09	13,006.45	13,025.81	12,771.21	10,262.11	8,986.39	7,189.78	7,317.52	6,371.85
Recreational	3,137.39	3,045.22	3,058.91	2,973.94	2,807.67	2,245.84	2,317.84	2,131.40	1,408.81	1,901.44	2,199.96
Municipal	1,719.91	1,610.42	1,568.04	1,593.74	1,466.48	1,541.42	1,528.84	1,545.46	1,516.10	1,512.77	1,369.44
Other Non-De Minimis	50.40	49.72	47.93	52.51	52.51	52.51	229.66	245.37	161.17	160.58	187.70
De Minimis	26.50	26.50	26.50	26.50	26.50	26.50	26.50	26.50	26.50	26.50	26.50
Total Pumping	20,027.93	19,739.21	18,369.47	17,653.14	17,378.97	16,637.48	14,364.95	12,935.12	10,302.36	10,918.80	10,155.45

(a) Source for 2015-2018 estimates: Dudek, 2020b:

- 2015 pumping extrapolated from preceding year aerial imagery for all sites without metered pumping records.
- Water credit sites assumed to have ceased irrigation either on date of issuance of water credits or based on review of mid-2014 aerial imagery.
- A water use factor of 0.5 acre-feet per dwelling unit utilized to calculate De Minimis groundwater use.

(b) 2019 pumping updated from the WY 2019 Annual Report (Dudek, 2020b) to be consistent with recent updates made Dudek to support the Court proceedings on the proposed Stipulated Judgment. The 2019 pumping was extrapolated by Dudek from comparisons of 2018 and 2020 aerial imagery for all sites without metered pumping records.

(c) 2020 Sources and Methods:

- Agricultural pumping estimated based on method used for 2015-2018 (Dudek 2020a, 2020b) and using reported changes in 2020 aerial imagery that were assessed by Dudek to update the 2019 pumping estimates described for 2019 in note (b) above.
- Municipal: Based on BWD monthly reports to the Board.
- Golf Course: Based on meter reads for Borrego Springs Resort, Circle Club, and Rams Hill. Other pumping by golf courses (De Anza, Road Runner, The Springs) based on estimation method used for 2015-2018 (Dudek 2020a, 2020b).
- Other non-De Minimis and De Minimis pumping estimated based on method used for 2015-2018 (Dudek 2020a, 2020b).

(d) WY 2021 - 2025 Sources and Methods:

- Pumping metered or estimated for all BPA parties. Table 16 in Section 4 of this Annual Report indicates whether pumping was metered or estimated, by Party for WY 2025. Values reflect any amendments made to Water Rights Accounting (see Appendix E)
- De minimis pumping estimated based on GMP method used for 2015-2018 (Dudek 2020a, 2020b).

(e) The total WY 2025 pumping amount shown in Table 16 is slightly larger than reported in Section 4.3 (by 26.5 af) because the Water Rights Accounting does not consider De Minimis pumping.

5.4.2 Surface Water Use

Currently, there is no surface water supply that is directly used or indirectly used for artificial or in-lieu recharge in the Basin.

5.4.3 Total Water Use

Because groundwater is the only source of water supply in the Basin, total water use in WY 2025 was equivalent to the sum of all groundwater pumping shown in Table 20: 10,155.45 af.⁶⁹

5.5 Groundwater Conditions

This section describes groundwater conditions for the three applicable Sustainability Indicators⁷⁰ identified in the GMP (and described in Section 1.3.2.1):

- Chronic Lowering of Groundwater Levels
- Reduction of Groundwater Storage
- Degradation of Groundwater Quality

For each Sustainability Indicator, this section describes historical trends and current conditions, and compares these groundwater conditions to the Minimum Thresholds defined in the 2020 GMP. The Minimum Thresholds are a quantitative value that represents the groundwater conditions at a Representative Monitoring Well that, when exceeded individually or in combination with Minimum Thresholds at other monitoring sites, may cause an Undesirable Result(s) in the Basin.

5.5.1 Groundwater Elevations

This section describes the historical trends and current conditions for groundwater elevations in the Basin through WY 2025, and then compares the trends and current conditions to the SMC in the GMP to evaluate progress towards achieving sustainability.

5.5.1.1 Historical Trends and Current Conditions

Prior to development of the Basin, groundwater flow was predominantly from the northwest to the southeast and groundwater elevations ranged from 600 feet above mean sea level (ft-amsl) in the northwestern part of the Basin to 460 ft-amsl in the southeast, near the Borrego Sink (Dudek, 2020a). Since the early 1950s, groundwater pumping in the Basin has exceeded recharge which caused long-term declines in groundwater levels and changes to the direction of groundwater flow in the Basin.

Figure 10 is a time-series chart that shows long-term trends in groundwater levels at selected wells in the NMA, CMA, and SMA of the Basin. Appendix G contains time-series charts of groundwater-level data for the 64 wells in the groundwater-level monitoring network from 1950 through 2025. Inspection of the groundwater levels shown on Figure 10 and Appendix G illustrate that in all areas of the Basin, there are wells with groundwater levels that are declining at lesser rates than in the past, and in some cases approaching stabilization. This is consistent with the observed declines in groundwater pumping

⁶⁹ The WY 2025 pumping amount shown in Table 20 is slightly larger than reported in Section 4.3, by 26.5 af, because the Water Rights Accounting does not consider De Minimis pumping.

⁷⁰ “Sustainability Indicator” refers to any of the effects caused by groundwater conditions occurring throughout the Basin that, when significant and unreasonable, cause Undesirable Results (CWC Section 10721(x)).

demonstrated in Section 5.4 of this Annual Report. Of the 64 wells in the current network, 52 have sufficient data to interpret trends over time. The data shows that as of fall 2025:

- Two wells have an increasing water level trend.
- Seven wells are showing stabilized water levels (not increasing or decreasing).
- 31 wells have a decreasing trend, but the annual rate of change is decreasing and trending towards stabilization.
- Eight wells have a decreasing trend similar to historical rates of decline (no change).
- Four wells have a decreasing trend that is greater than historical rates of decline.
- In the NMA, all wells with sufficient data show that wells already have or are approaching stabilization.
- In the CMA, the majority of wells have groundwater levels that are decreasing at an annual rate less than the past and are trending toward stabilization. The two wells with increasing water level trends are in the CMA.
- In the SMA, about half of the wells are trending toward stabilization and half are declining at rates similar to or more than historical rates of decline.

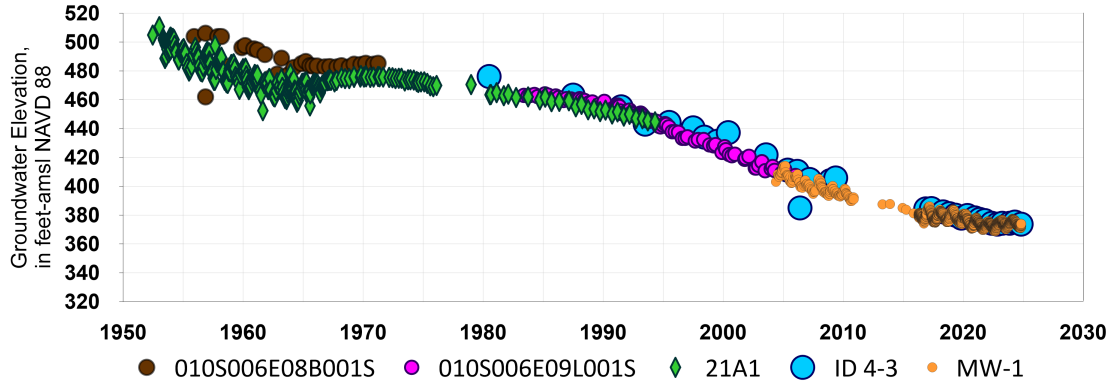
Figures 11 and 12 are maps that depict groundwater elevations during spring and fall 2025, respectively. These maps display “true static” groundwater elevations (i.e., groundwater elevations that are not influenced by pumping) at selected wells across the Basin and contours of equal groundwater elevation based on the elevations.⁷¹ The maps were prepared pursuant to a Watermaster-approved methodology to estimate annual changes in groundwater storage for annual reporting (see Section 5.5.2).⁷² The main observations from Figures 11 and 12 are:

- Groundwater elevations were highest near the main areas of recharge (Coyote Creek in the NMA and San Felipe Creek in the SMA) and groundwater elevations were lowest near the major pumping centers in the southern NMA and CMA.
- The directions of groundwater flow were generally away from recharge areas along the Basin boundaries towards the areas of highest pumping and lowest groundwater elevations in the southern NMA and western CMA.
- Seasonal variations in groundwater elevations were minor and did not change the regional directions of groundwater flow.

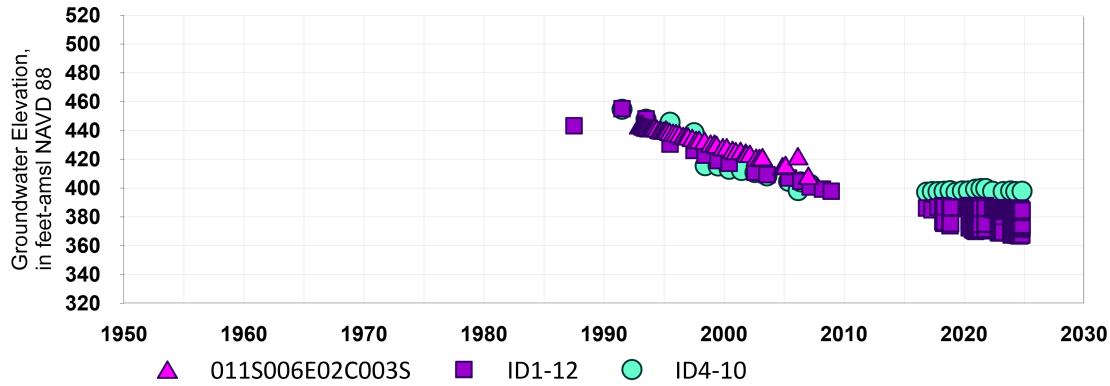
⁷¹ The groundwater-elevation contours shown on Figures 11 and 12 were prepared for the specific purpose of estimating groundwater storage change for the Annual Report and should not be used for other purposes.

⁷² West Yost. 2022. [Methods to Estimate Annual Storage Change in the Borrego Springs Subbasin](#). Prepared for the Borrego Springs Watermaster. February 11, 2022.

North Management Area



Central Management Area



South Management Area

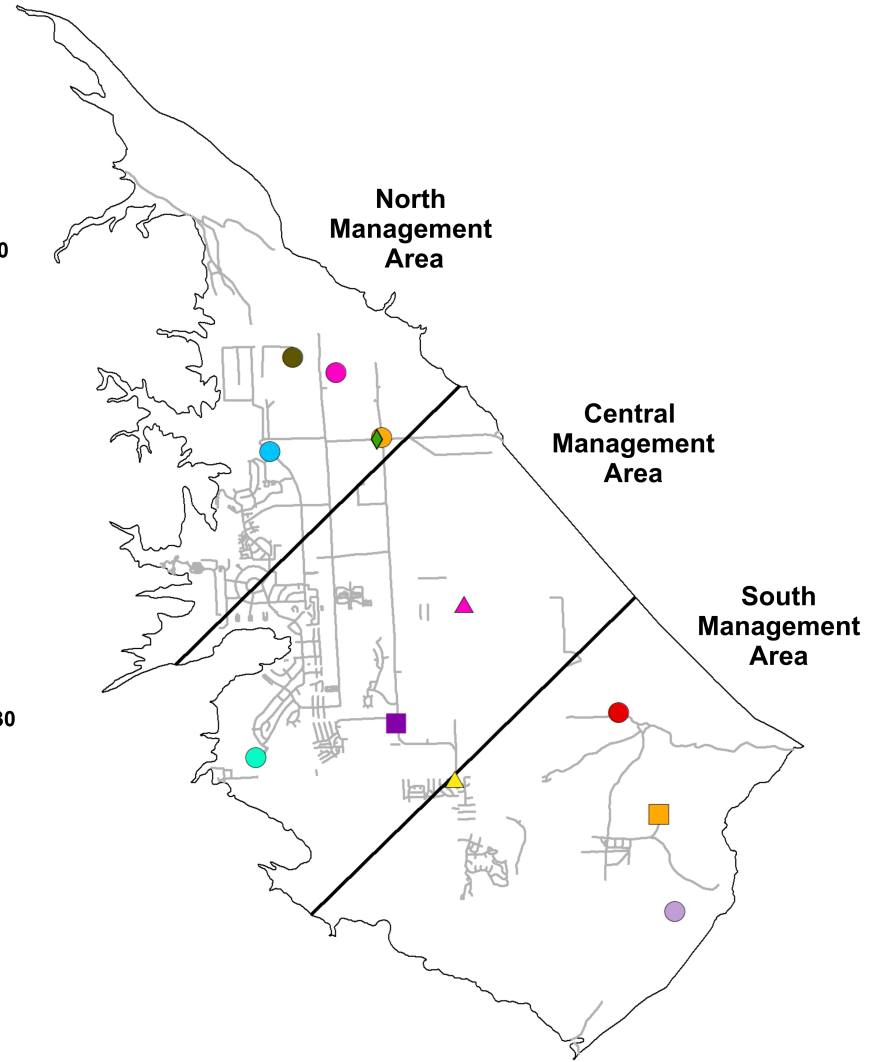
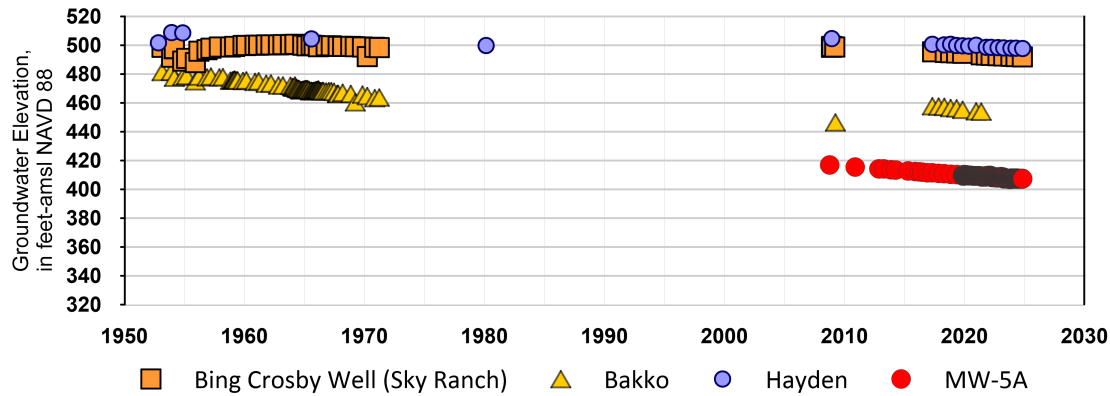
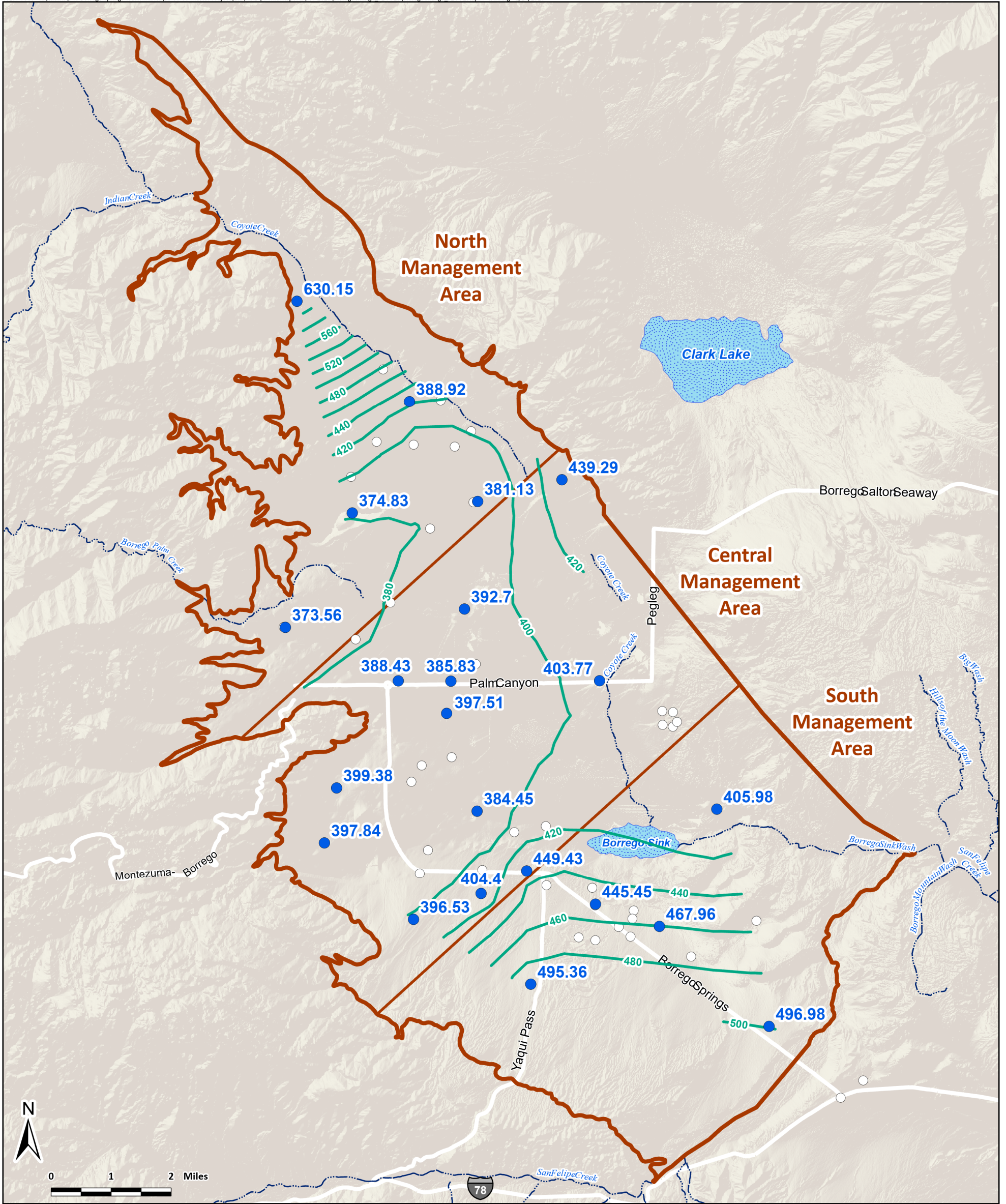


Figure 10
Groundwater Levels in Selected Wells within the Borrego Groundwater Subbasin



Groundwater Monitoring Wells Used to Develop Groundwater Elevation Contours for Spring 2025

- 350 ● True static groundwater elevation (ft-amsl)
- 350 ○ Estimated static groundwater elevation (ft-amsl)

Groundwater Elevation Contours Spring 2025 (ft-amsl)

—400—

Other Features

- ▭ Borrego Springs Subbasin with Management Area Divisions
- Other Groundwater-Level Monitoring Wells

Surface Water Features

- Stream Channel
- ▭ Dry Lake



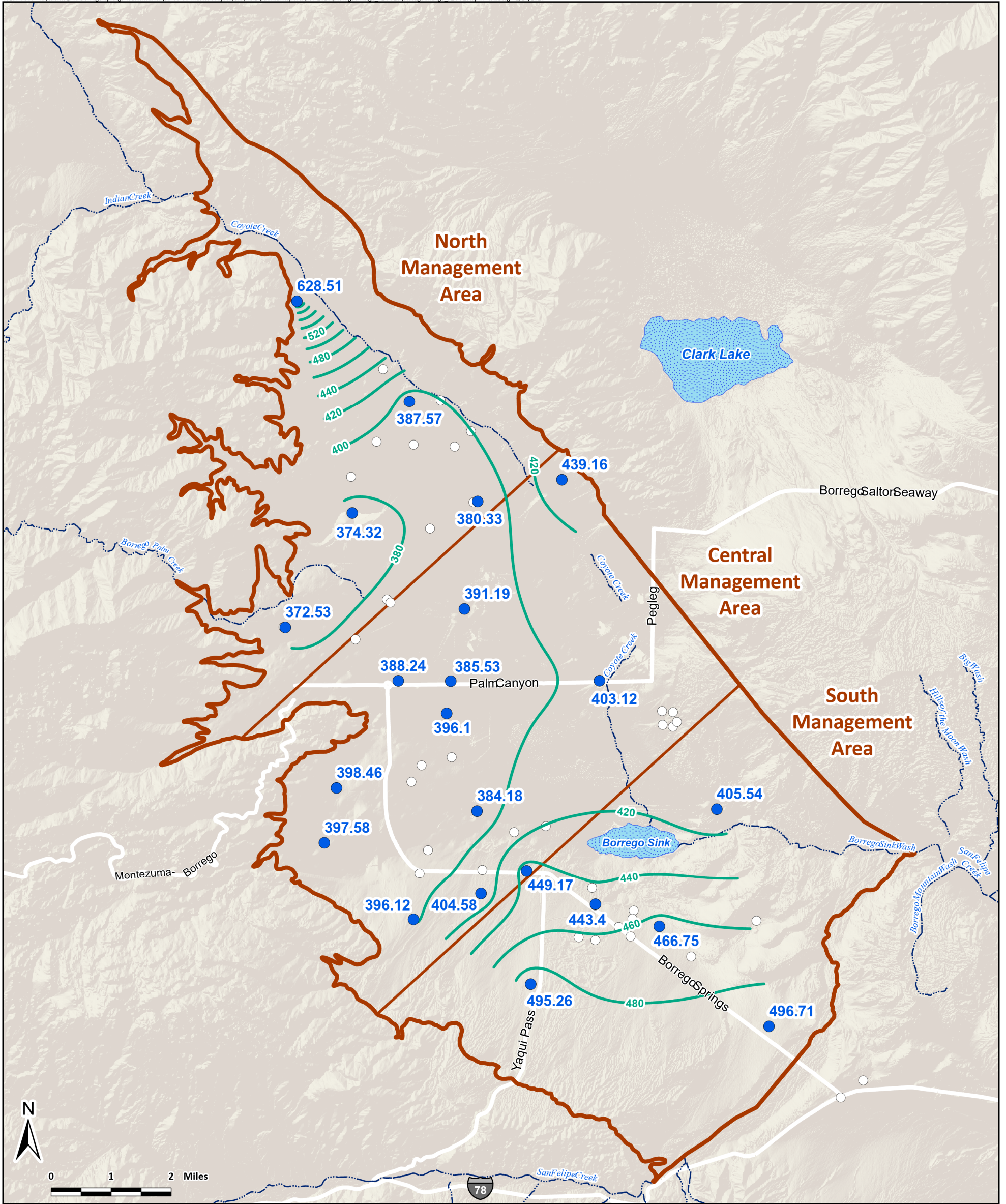
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Figure 11

Spring 2025 Groundwater Elevation

Borrego Springs Watermaster
Borrego Springs Subbasin
2025 Annual Report



Groundwater Monitoring Wells Used to Develop Groundwater Elevation Contours for Fall 2025

- True static groundwater elevation (ft-amsl)
- Estimated static groundwater elevation (ft-amsl)

Groundwater Elevation Contours Fall 2025 (ft-amsl)



Other Features

- Borrego Springs Subbasin with Management Area Divisions
- Other Groundwater-Level Monitoring Wells

Surface Water Features

- Stream Channel
- Dry Lake



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Figure 12

Fall 2025 Groundwater Elevation

Borrego Springs Watermaster
Borrego Springs Subbasin
2025 Annual Report

5.5.1.2 Comparison to Sustainable Management Criteria

The 2020 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 and 2) the trends in groundwater levels are stable or increasing. To help evaluate progress towards the Sustainability Goal, the GMP established Minimum Thresholds for static groundwater elevations at 16 Representative Monitoring Wells across the Basin.⁷³ The Minimum Thresholds were based on an analysis of (i) the top of well screens, (ii) on model projections of groundwater level changes that are expected to occur through 2040, and (iii) the variability of climate and groundwater recharge. The Minimum Thresholds are intended to be compared to static (non-pumping) groundwater elevations.

Through implementation of various technical tasks, Watermaster staff have identified problems with some of the SMC established in the GMP, specifically the Measurable Objectives and Minimum Thresholds for groundwater levels for a number of wells in the Basin. The details of the which methods described above were used to establish the Measurable Objectives and Minimum Thresholds at each well are unclear, however it is clear there are at least a two issues with the SMC, including: (1) at some Representative Monitoring Wells, the Minimum Thresholds elevations are higher than the Measurable Objectives elevations, which is not logical, and (2) because the simulation of future pumping in the SMA did not accurately reflect planned pumping under the Rampdown, any SMC based on the model projections do not represent reasonable operational scenarios for establishing thresholds.

In WY 2025, as part of the development of the 5-Year Assessment Report and modeling work to support the redetermination of the 2025 Sustainable Yield, the Watermaster began developing methods to update the Minimum Thresholds, Measurable Objectives, and Interim Milestones for groundwater levels and storage. In WY 2026, the Watermaster will finalize the updates to the SMC and document the changes in the 5-Year Assessment Report. For the purpose of this Annual Report, groundwater levels are only compared to Minimum Thresholds (as defined in Tables 3-4 and 3-5 of the 2020 GMP) and not the Measurable Objectives to avoid confusion.

The following figures and tables were prepared to compare groundwater level conditions to Minimum Thresholds:

- Figures 13a through 13p are time-series charts of groundwater elevation at the 16 Representative Monitoring Wells.⁷⁴ The charts delineate the start of GMP implementation and show the Minimum Threshold as a horizontal red line extending

⁷³ Minimum Thresholds for the chronic lowering of groundwater levels for each Representative Monitoring Well are defined in Tables 3-4 and 3-5 in the GMP.

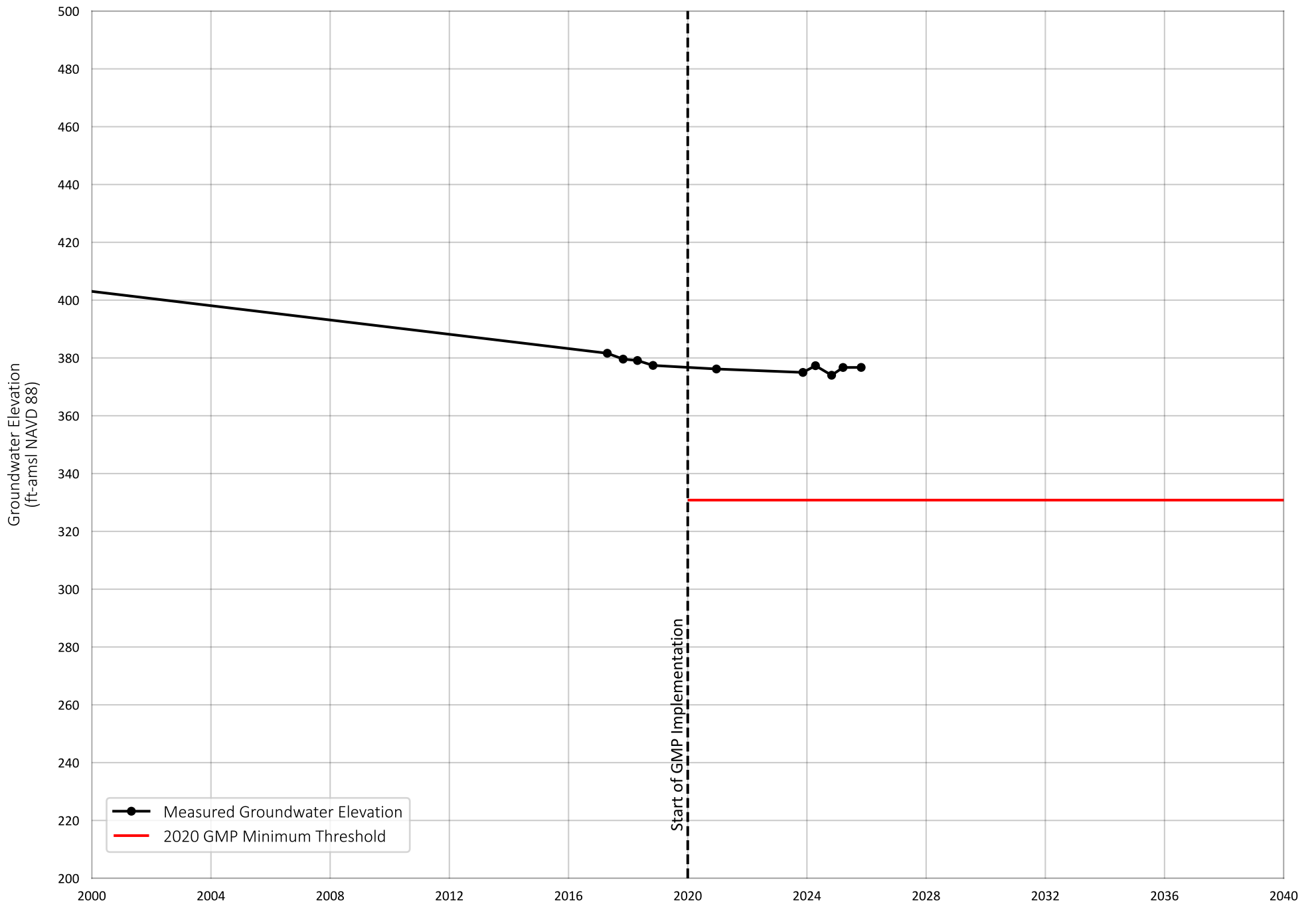
⁷⁴ Figures 13a through 13p show static groundwater elevations. Static groundwater elevations those under non-pumping conditions. The groundwater elevations that occur while the wells are pumping, or influenced by pumping, are not representative of “true static” groundwater conditions and, therefore, are not intended to be compared to Minimum Thresholds. In some cases, wells are equipped with high-frequency transducer data and capture groundwater elevations during groundwater pumping at the well, or a nearby well. Pumping groundwater elevations show fluctuations in groundwater levels due to pumping, including drawdown (groundwater level declines due to water being removed from the aquifer) and recovery (groundwater level increases once pumping ends). Only static elevations are used to perform analysis of regional groundwater elevations. To display static groundwater elevations for active pumping, or those notably impacted by pumping, the high-frequency transducer data has been screened to remove groundwater elevations influenced by groundwater pumping at the well.

from 2020 through 2040. The location of the Representative Monitoring Wells are shown on Figure 3.

- Table 21 compares fall 2025 groundwater elevations to the Minimum Thresholds for the 16 Representative Monitoring Wells in the 2020 GMP. The goal is for current elevations to be greater than the Minimum Threshold elevation.

Inspection of the groundwater-elevation data shown on these figures and tables illustrates that:

- There have been no exceedances of Minimum Thresholds in the 2020 GMP based on static groundwater level conditions at any Representative Monitoring Well.



Prepared by:



Figure 13-a

Groundwater Level and Sustainable Management Criteria at Representative Monitoring Well Fortiner #1 (Allegre 1)

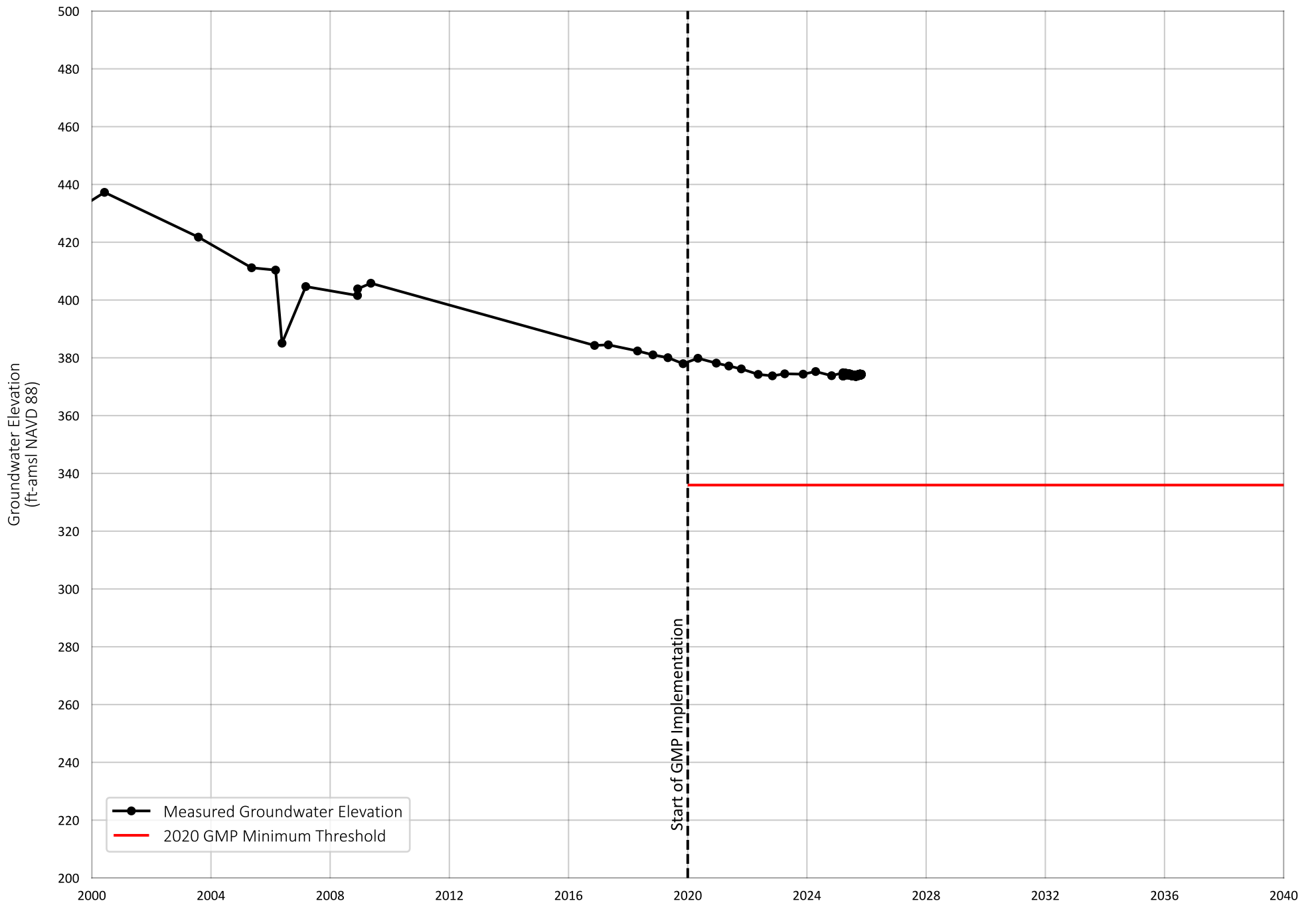


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Figure 13-b

Groundwater Level and Sustainable Management Criteria
at Representative Monitoring Well ID4-18

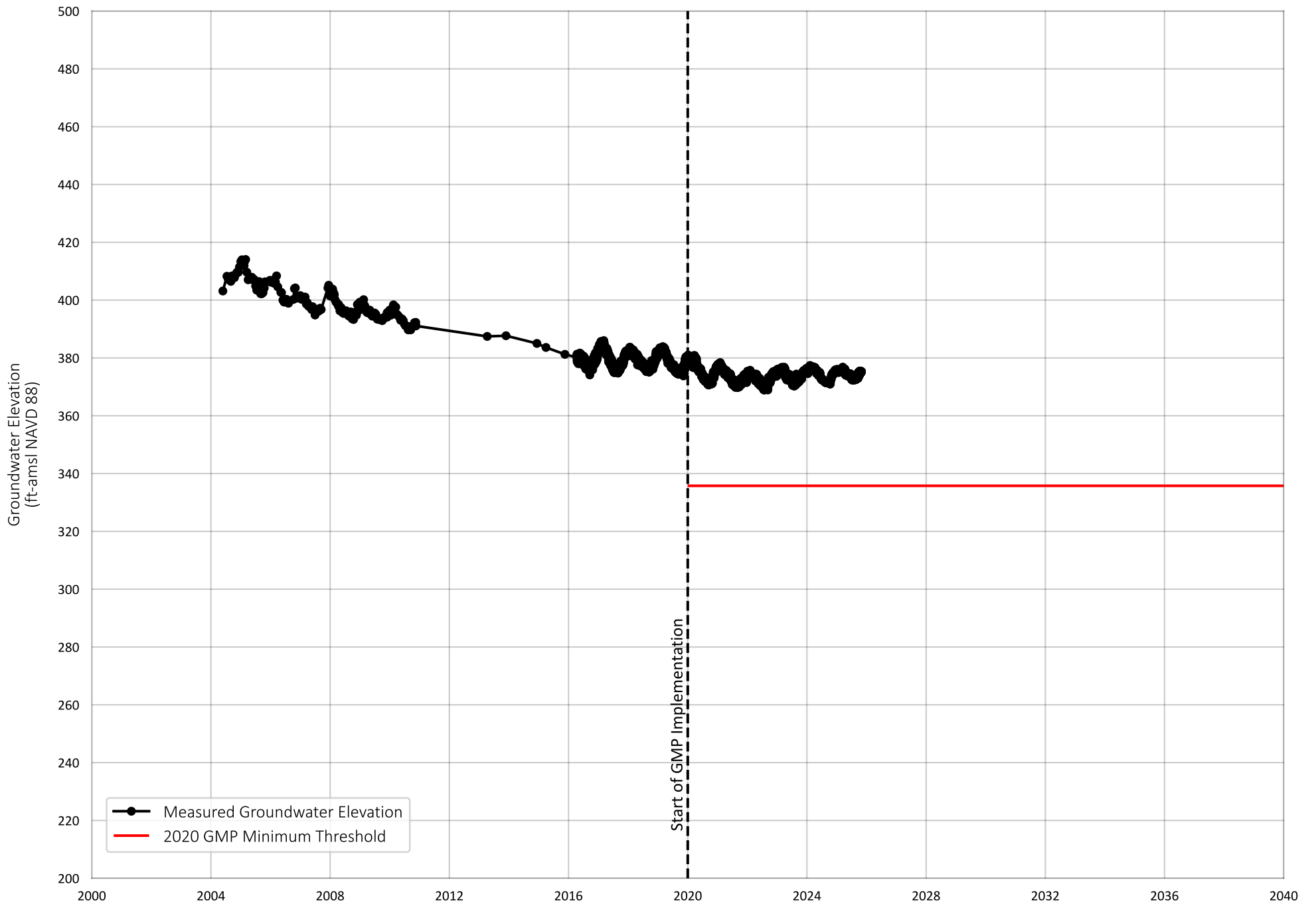


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Figure 13-c

Groundwater Level and Sustainable Management Criteria
at Representative Monitoring Well ID4-3

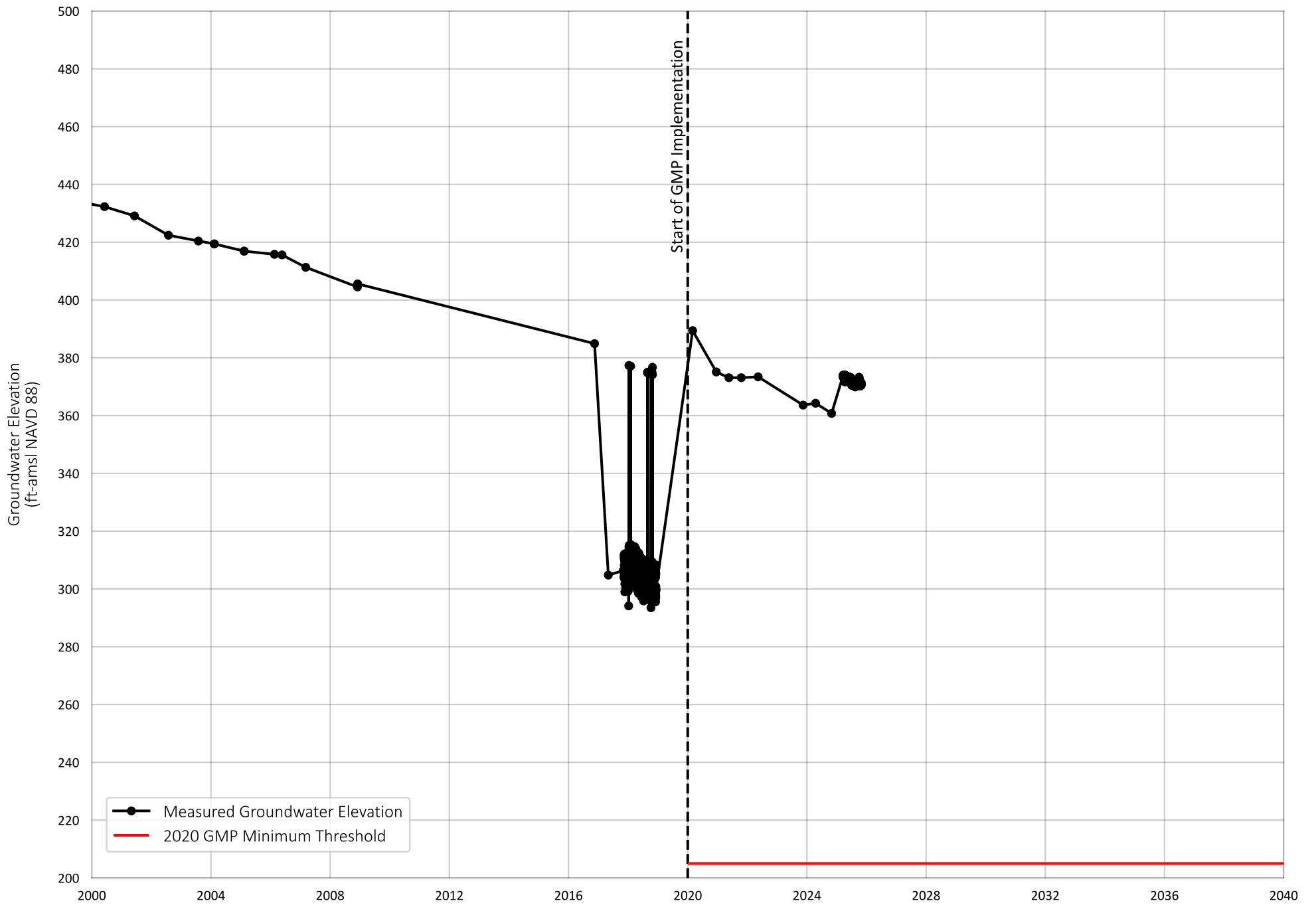


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Figure 13-d

Groundwater Level and Sustainable Management Criteria
at Representative Monitoring Well MW-1



Prepared by:



Figure 13-e

Groundwater Level and Sustainable Management Criteria at Representative Monitoring Well ID4-4

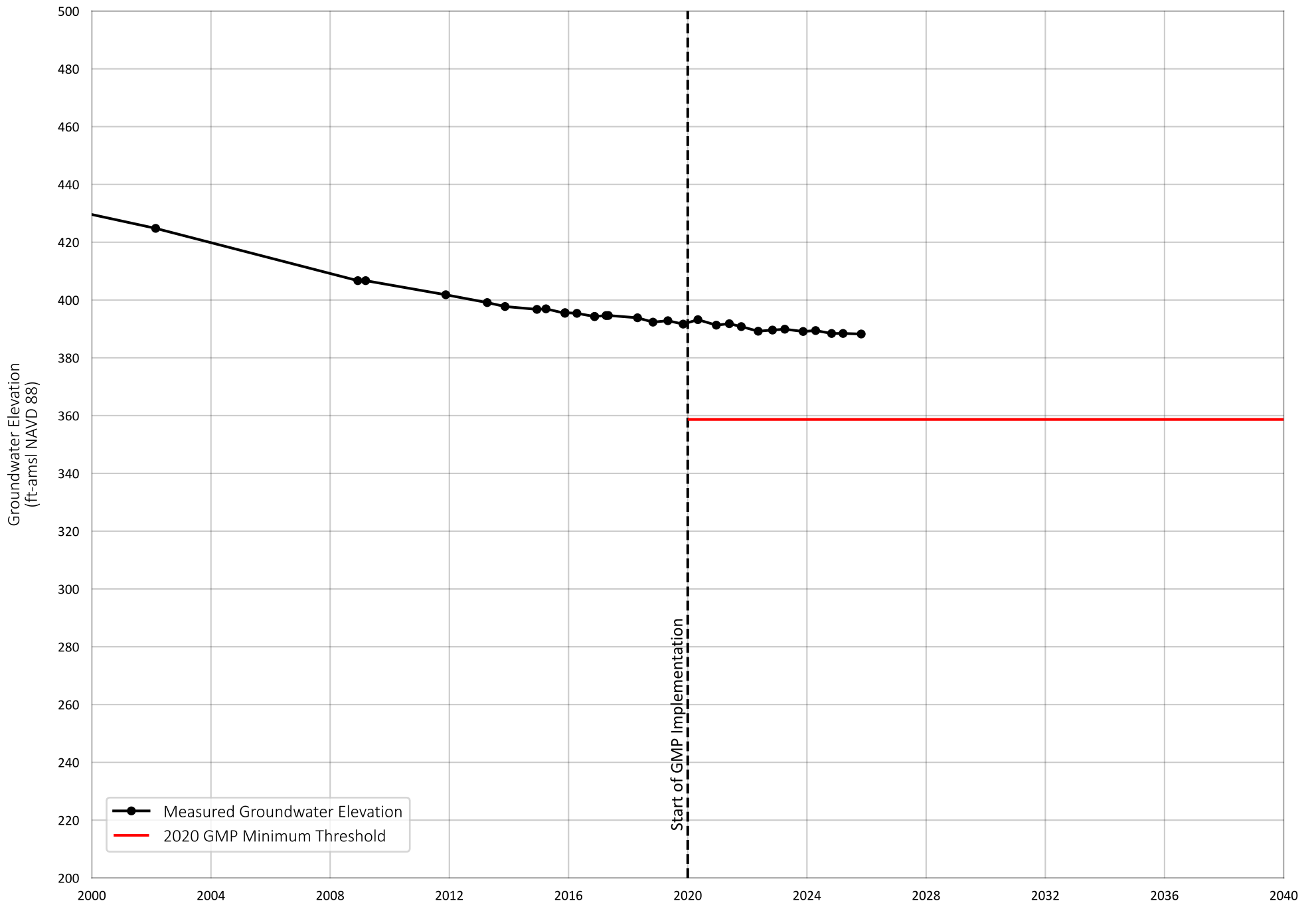


Prepared by:



Figure 13-f

Groundwater Level and Sustainable Management Criteria
at Representative Monitoring Well ID4-11

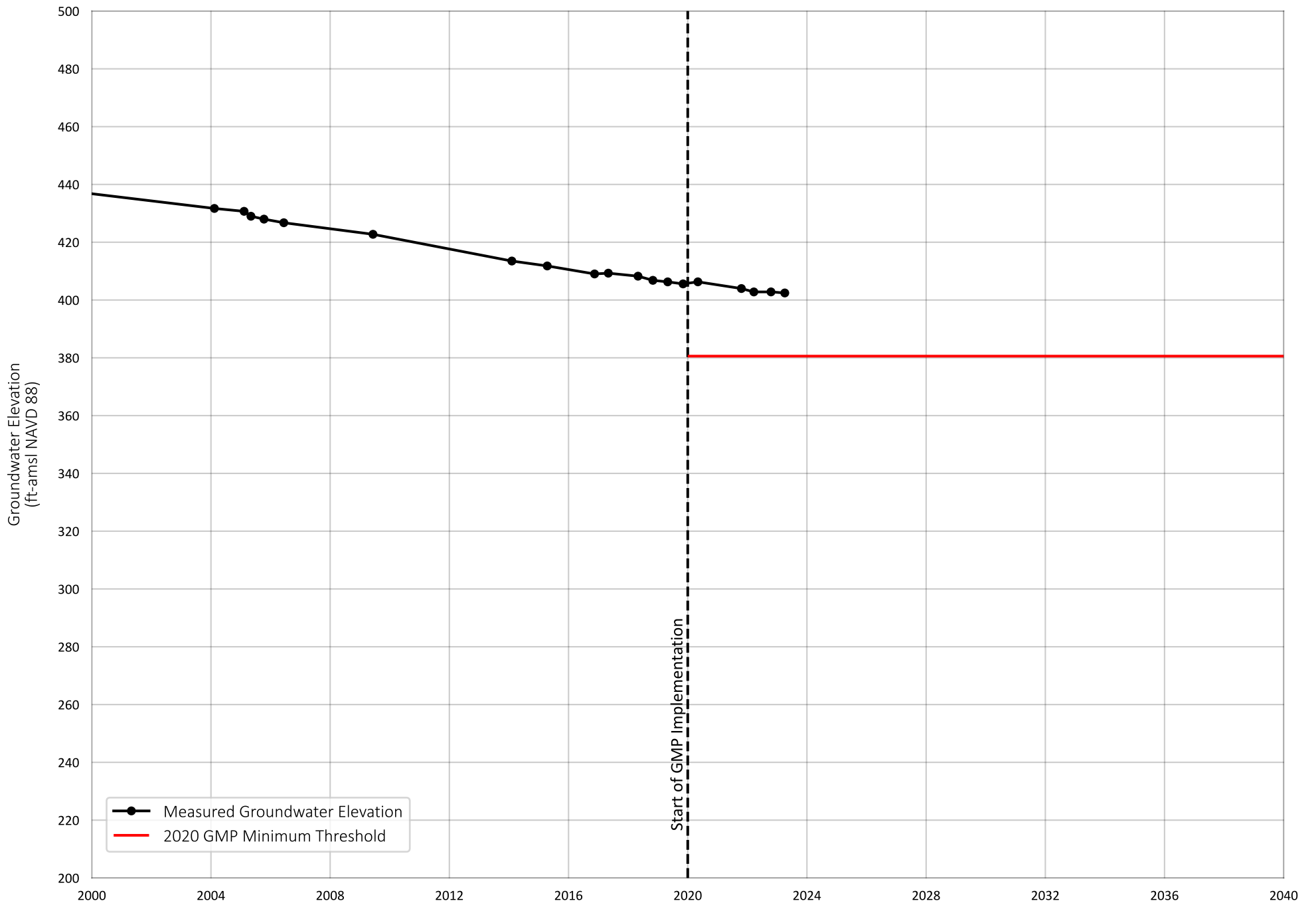


Prepared by:



Figure 13-g

Groundwater Level and Sustainable Management Criteria
at Representative Monitoring Well ID4-1

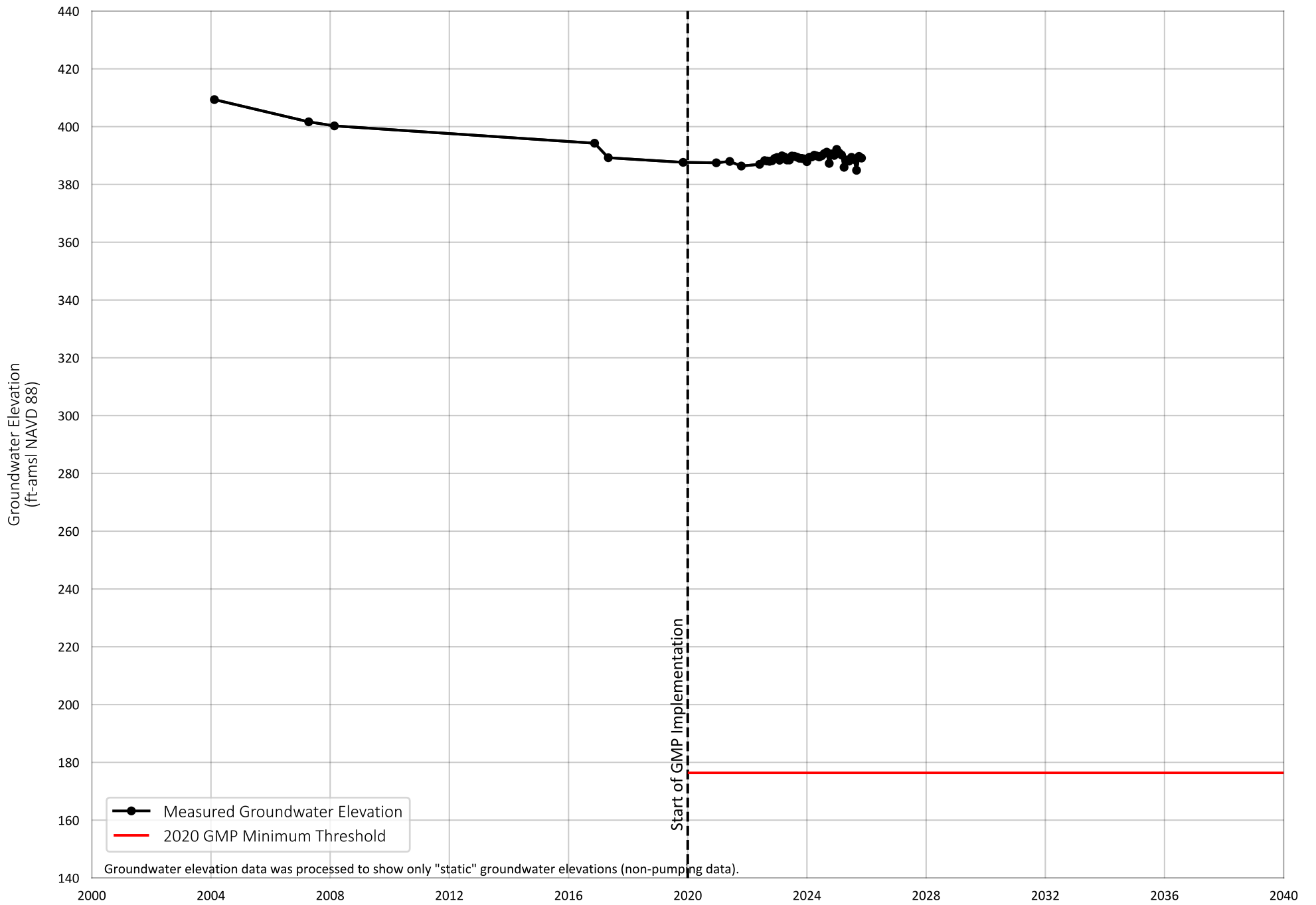


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Figure 13-h

Groundwater Level and Sustainable Management Criteria
at Representative Monitoring Well Airport 2

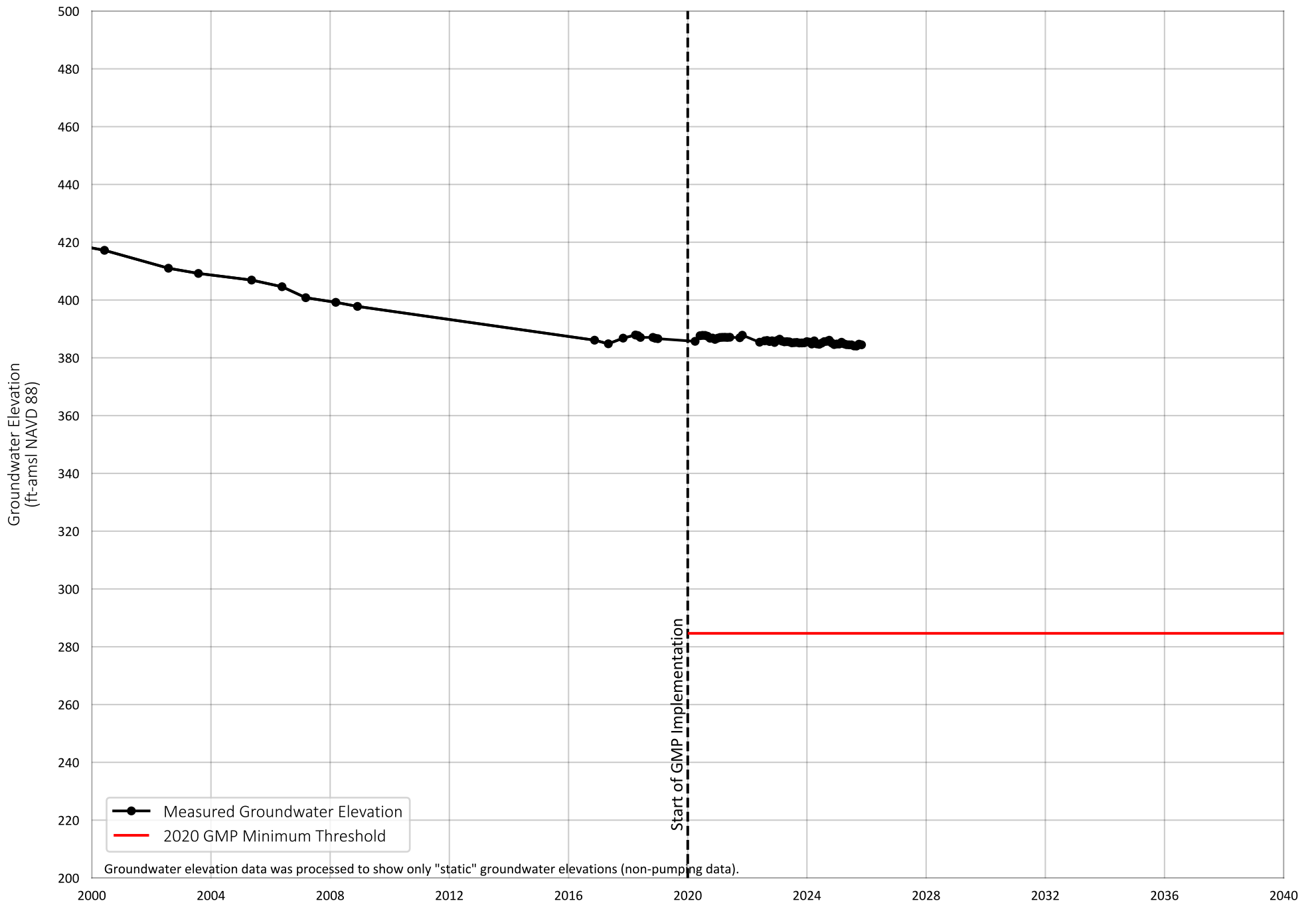


Prepared by:



Figure 13-i

Groundwater Level and Sustainable Management Criteria
at Representative Monitoring Well ID5-5

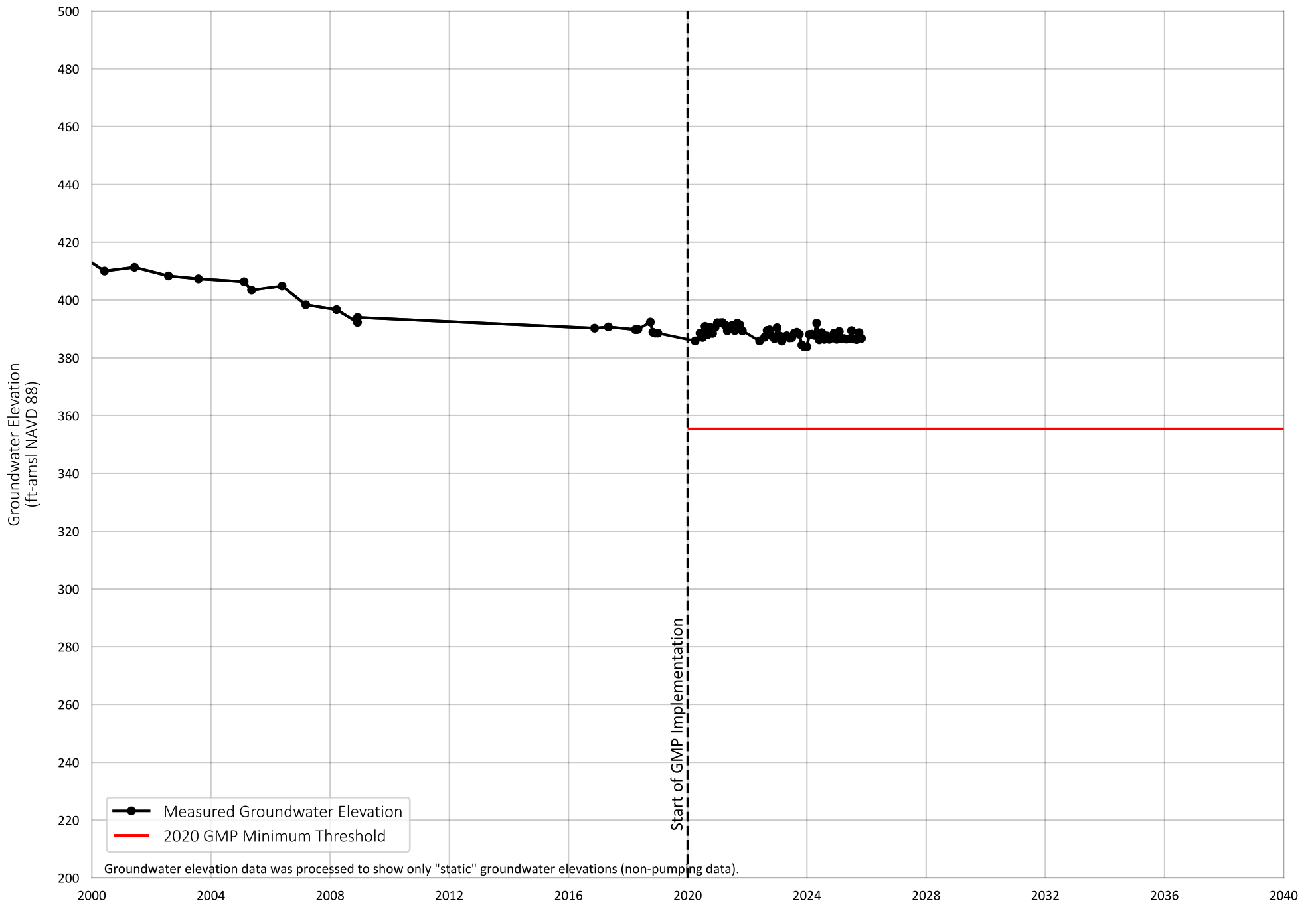


Prepared by:



Figure 13-j

Groundwater Level and Sustainable Management Criteria
at Representative Monitoring Well ID1-12

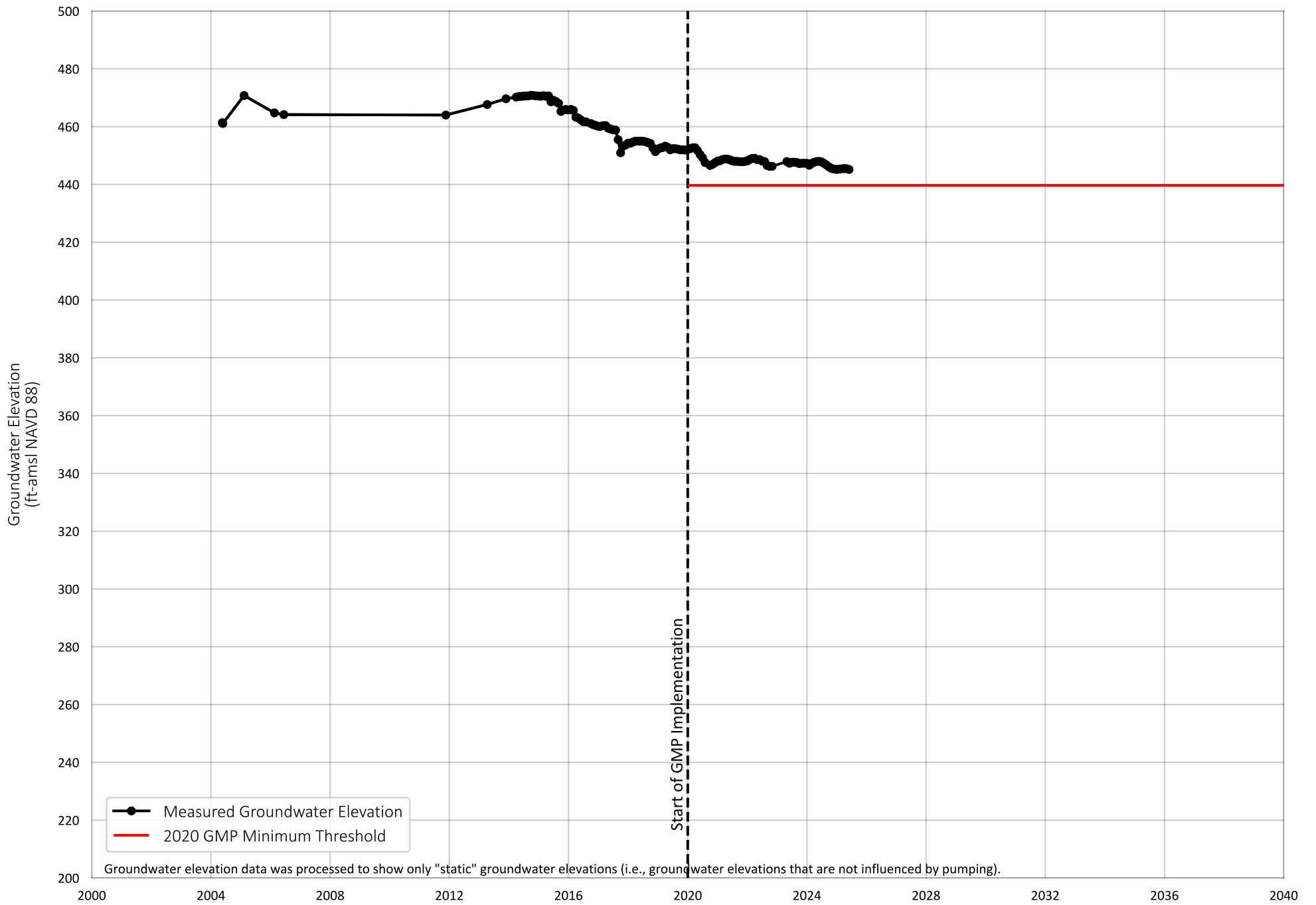


Prepared by:



Figure 13-k

Groundwater Level and Sustainable Management Criteria at Representative Monitoring Well ID1-16

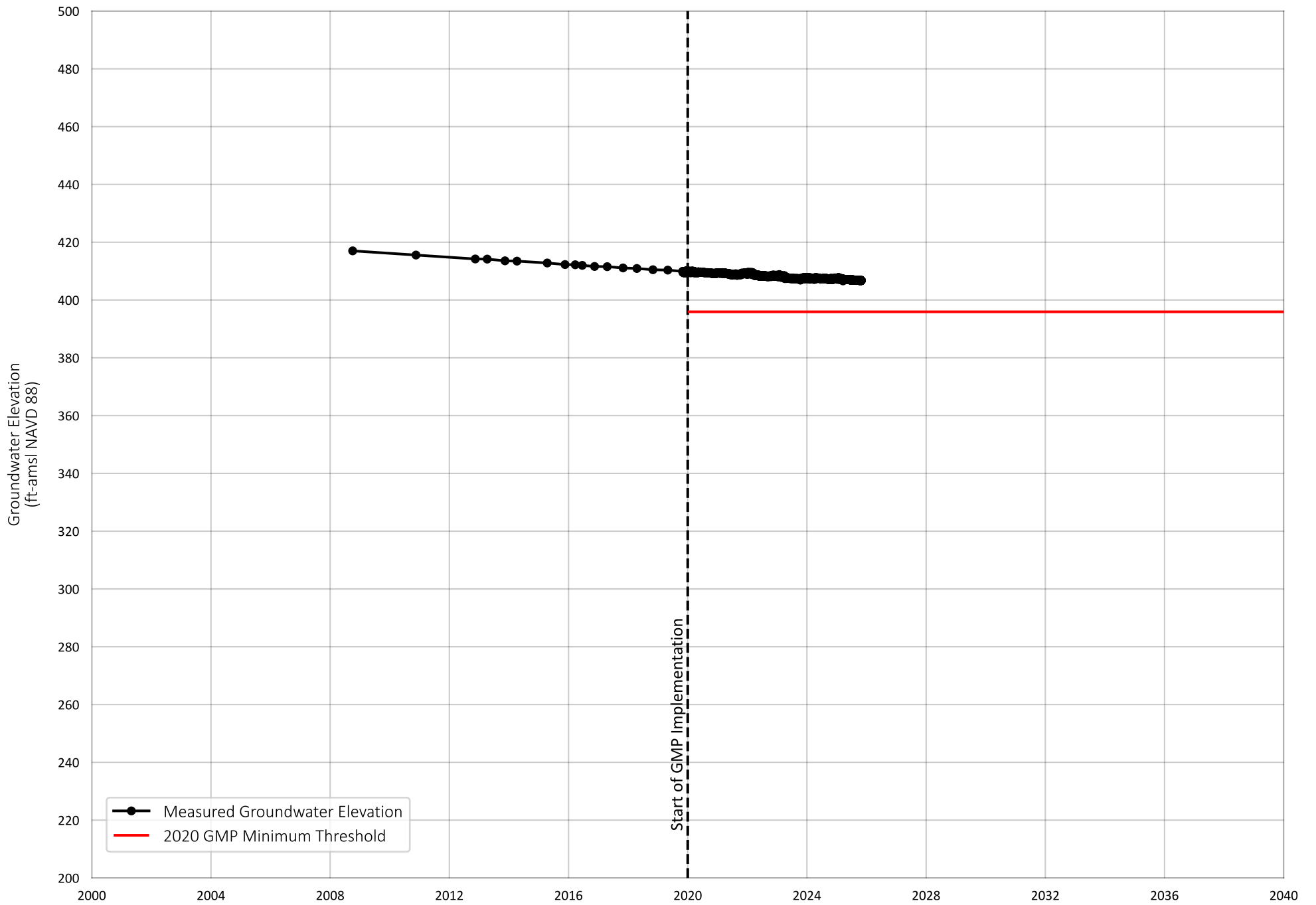


Prepared by:



Figure 13-I

Groundwater Level and Sustainable Management Criteria
at Representative Monitoring Well MW-3

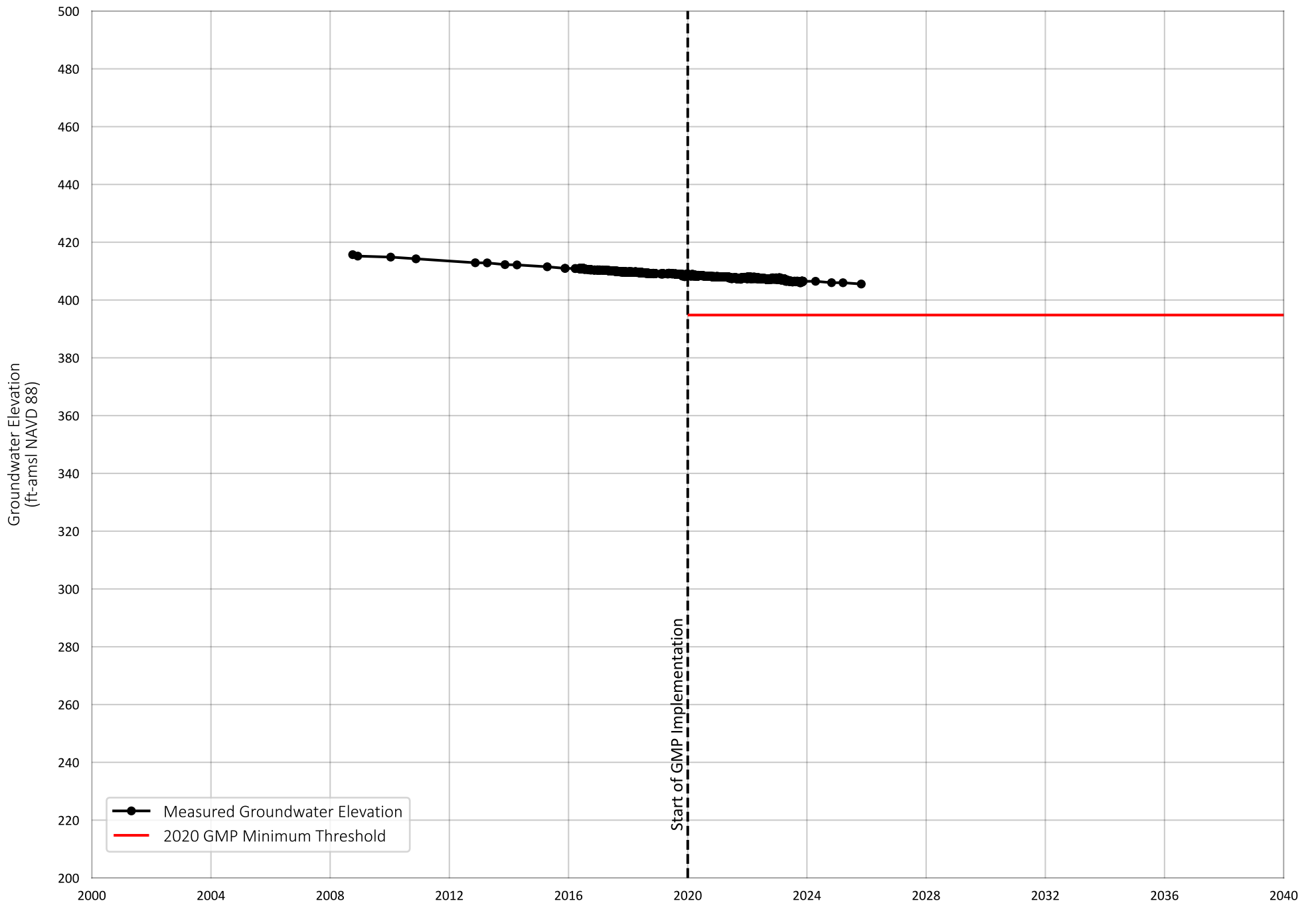


Prepared by:



Figure 13-m

Groundwater Level and Sustainable Management Criteria at Representative Monitoring Well MW-5A (East-Lower)

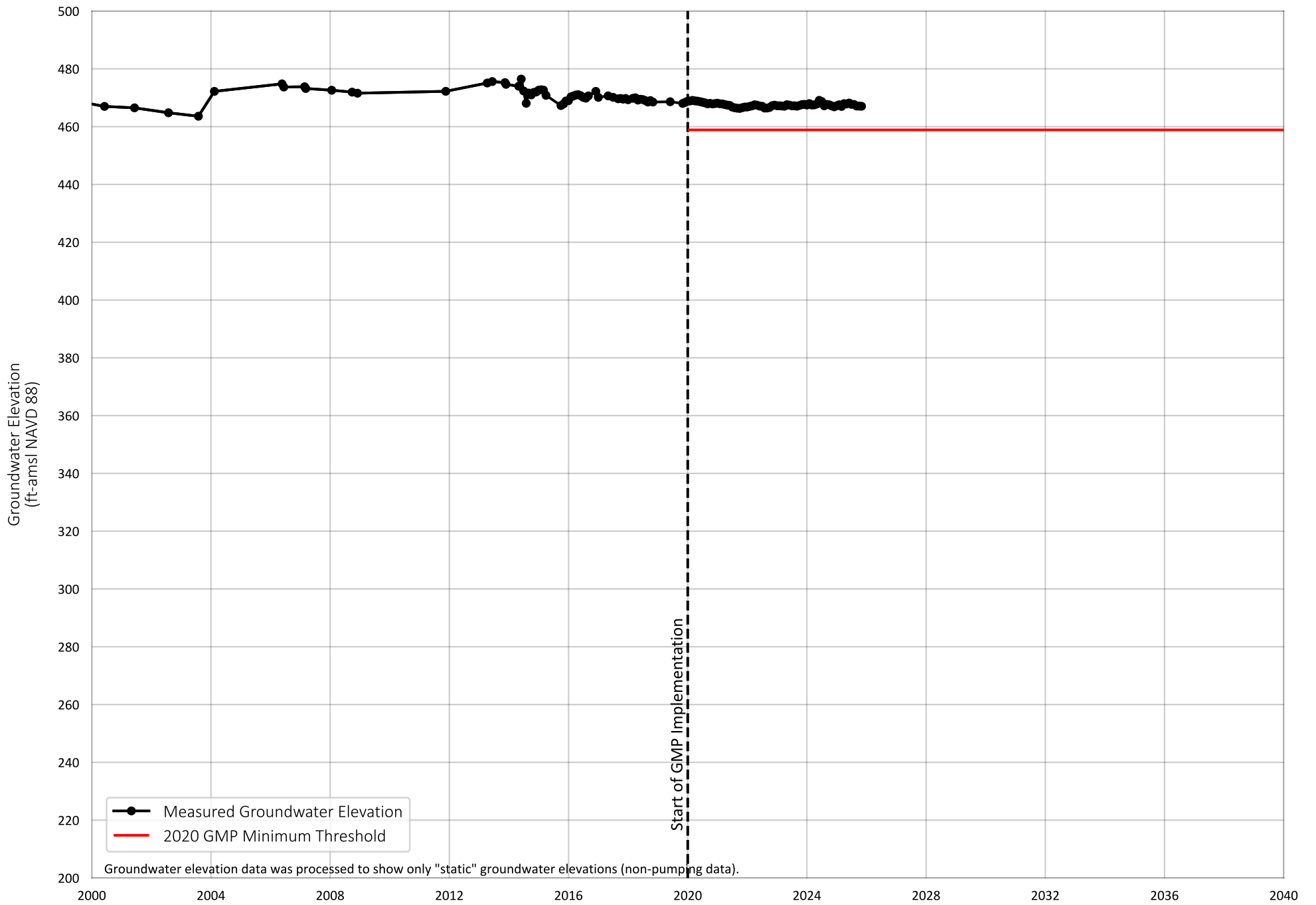


Prepared by:



Figure 13-n

Groundwater Level and Sustainable Management Criteria at Representative Monitoring Well MW-5B (West-Upper)

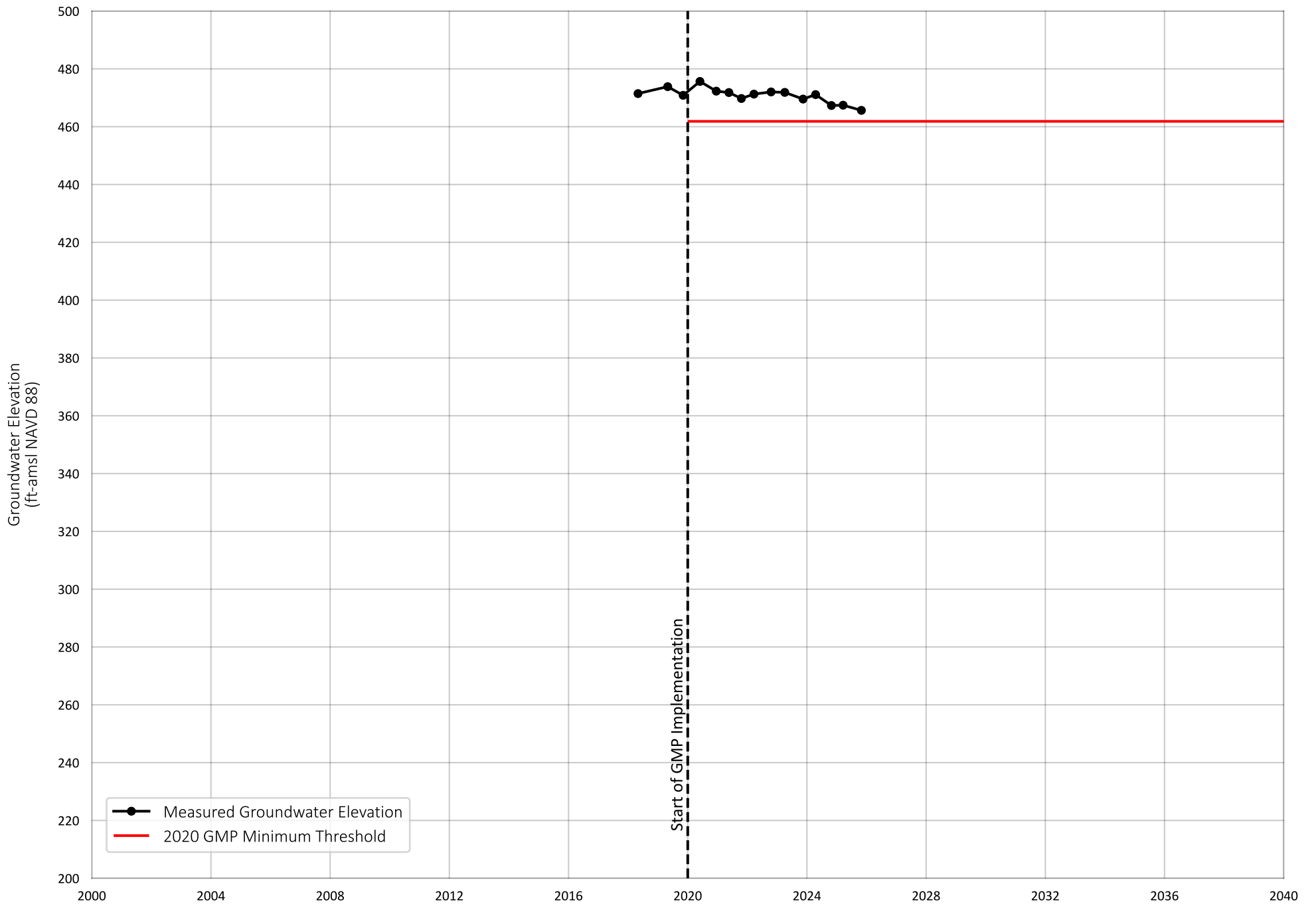


Prepared by:



Figure 13-o

Groundwater Level and Sustainable Management Criteria at Representative Monitoring Well RH-1 (ID1-1)



Prepared by:



Figure 13-p

Groundwater Level and Sustainable Management Criteria at Representative Monitoring Well Air Ranch Well 4

**Table 21. Current Groundwater Elevations at Representative Monitoring Wells
Compared to 2020 GMP Minimum Thresholds^(a)**

Local Well Name	State Well ID	Fall 2025 Groundwater Elevation ^(b) (ft-msl)	2020 GMP Minimum Threshold ^(c, d) (ft-msl)	Fall 2025 Groundwater Elevation minus 2020 GMP Minimum Threshold (ft)
		<i>a</i>	<i>b</i>	<i>c = a - b</i>
North Management Area				
MW-1	010S006E21A002S	375.25	336	39.5
ID4-3	010S006E18R001S	374.32	336	38.4
Fortiner	010S006E09N001S	376.72	331	45.9
ID4-18	010S006E18J001S	370.16	330	39.8
ID4-4	010S006E29K002S	370.84	128	243.3
Central Management Area				
ID4-1	010S006E32R001S	388.24	359	29.6
Airport 2	010S006E35N001S	<i>398.93</i>	381	18.4
ID1-16	011S006E16N001S	386.75	355	31.3
ID4-11	010S006E32D001S	372.72	164	209.0
ID1-12	011S006E16A002S	384.40	285	99.8
ID5-5	011S006E09E001S	384.50	176	208.1
South Management Area				
MW-5A	011S007E07R001S	406.77	396	10.9
MW-5B	011S007E07R002S	405.54	395	10.7
MW-3	011S006E23J002S	443.40	438	5.7
Air Ranch	011S007E30L001S	465.65	462	3.8
RH-1	011S006E25A001S	466.75	459	7.9

(a) The Representative Monitoring Wells and Minimum Thresholds reported in this table are those defined in the 2020 GMP.

(b) If a water level was not measured in Fall 2025, an "estimated static" groundwater elevation was selected based on recent trends in groundwater elevation at the well and nearby wells, and knowledge of the influence of nearby pumping. Estimated values are shown in *blue italic font*. In Fall 2025, the only estimated value is for the Airport 2 well; its well casing collapsed prior to the Semi-Annual Monitoring Event in fall 2023.

(c) *Italic values* are Minimum Thresholds established based on the top of the well screen. All other Minimum Thresholds are based on model results from the Borrego Valley Hydrologic Model (BVHM). All Minimum Thresholds in the GMP have been converted to feet above mean sea level.

(d) In its work to prepare the five-year assessment of the GMP and perform modeling for the Redetermination of Sustainable Yield, Watermaster staff determined that there are problems with some of the Sustainable Management Criteria (SMCs) established in the GMP—specifically the Measurable Objectives (MOs) and Minimum Thresholds (MTs) for groundwater levels—for a number of wells in the Basin. The problems with the SMCs include: (1) at some Representative Monitoring Wells, the MT elevations are higher than the MO elevations, which is not logical, and (2) the simulation of future pumping in the South Management Area did not accurately reflect planned pumping under the Rampdown—specifically, no pumping was assumed in the future and thus any SMCs based on the model projections do not represent reasonable operational flexibility. The SMCs for groundwater elevations and estimate of groundwater in storage in the Basin are being updated as part of the 5-year GMP Assessment. For the purpose of this report, groundwater levels are only compared to MTs.

5.5.2 Change in Groundwater Storage

This section describes the historical trends and current changes in groundwater storage in the Basin through WY 2025, the methods used to estimate storage changes, and compares the trends and current conditions to the Minimum Threshold in the GMP to evaluate progress towards achieving sustainability.

5.5.2.1 Historical Trends and Current Conditions

The Basin is estimated to have a total storage capacity of approximately 5,500,000 af across all three layers of the aquifer system (upper, middle, and lower aquifers) (USGS, 1982). Since 1945, groundwater pumping in the Basin has exceeded recharge which caused long-term declines in groundwater levels and removal of groundwater in storage (i.e., conditions of overdraft).

Figure 14⁷⁵ is a time-series chart that depicts the estimates of annual and cumulative changes in storage that occurred in the Basin from 1945 to 2025. The chart shows that annual storage changes over time included both additions (increases) to storage and subtractions from storage (decreases). Additions to storage occurred infrequently during very wet years. Typically, annual changes in storage were subtractions due to the conditions of overdraft.

The chart is divided into parts to facilitate the comparison of groundwater storage changes to the Minimum Threshold for reductions in groundwater storage:

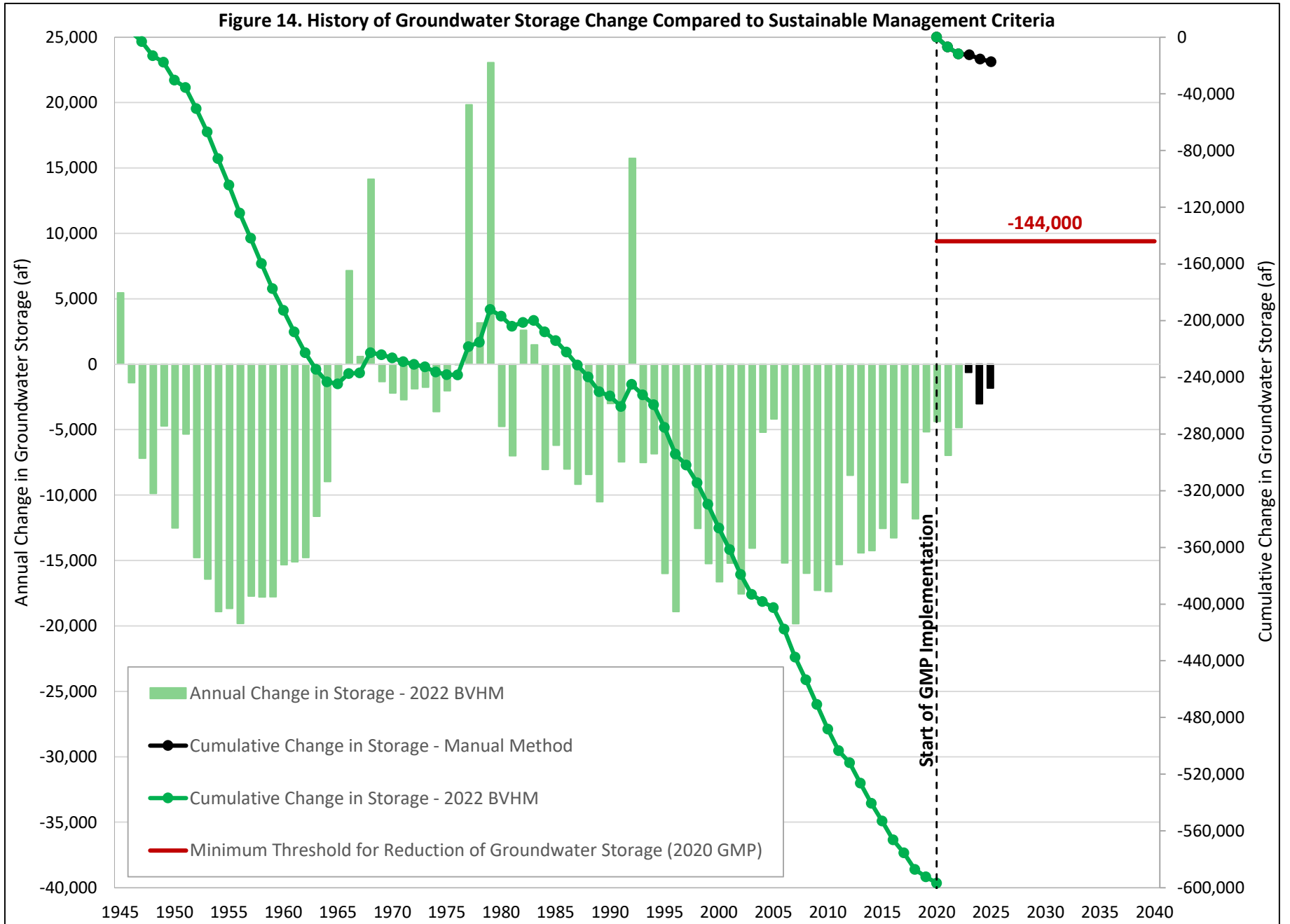
1. Storage changes that occurred prior to GMP implementation (WY 1945-2019). The total reduction in storage was about -596,768 af over this 75-year period, an average of -7,957 afy.
2. Storage changes that occurred during GMP implementation (WY 2020-2025). The total reduction in storage was about -17,283 af over this five-year period, an average of -3,457 afy.

The subsections below describe: (i) the methods that have been used to estimate storage changes, (ii) the estimate of storage change that occurred from fall 2024 to fall 2025, and (iii) the comparison of the cumulative storage change that occurred during GMP implementation (WY 2020-2025) to the Minimum Threshold for reduction in groundwater storage as defined in the 2020 GMP.

⁷⁵ Values shown on Figure 14 have been updated relative to prior Annual Reports to reflect: (i) replacing results from the 2016 BVHM with results from the 2022 BVHM, and (ii) calculating the change in storage over the period of fall-to-fall instead of spring-to-spring using the GIS method. In prior Annual Reports, the historical change in storage results from the 2016 BVHM were used for the period of WY 1945 to 2016 since the data represented the best available science at the time. Following the extension and recalibration of the BVHM through WY 2022 (as described in Section 3.4.1), results from the 2022 BVHM now represent the best available science and have replaced and supersede the results previously estimated by 2016 BVHM for the period of WY 1945 through 2022.

Additionally, in prior Annual Reports the GIS calculation estimated changes in storage over the period of spring-to-spring (i.e., in the middle of each WY) for the period of WY 2016 to 2024. In WY 2025, the GIS method was updated to calculate the change in storage from fall-to-fall (i.e., at the start of each WY). Results from the GIS calculation using fall-to-fall data are used for the period of WY 2023 to 2025, which are shown on Figure 14 of this Annual Report, supersede previous estimates, and will be reported in future Annual Reports.

Figure 14. History of Groundwater Storage Change Compared to Sustainable Management Criteria



5.5.2.2 Methods for Estimating Annual Change in Groundwater Storage

Two methods have been employed to estimate changes in groundwater storage in the Basin:

1. Groundwater-flow models can simulate the water budget of a groundwater basin, including changes in groundwater storage over time. As part of the redetermination of the 2025 Sustainable Yield, the BVHM was extended through WY 2022 and recalibrated. Results from the 2022 BVHM are used to characterize the historical water budget of the Basin and the storage changes that occurred from WY 1945-2022. Figure 14 shows the 2022 BVHM estimates of annual storage change as light green bars.
2. Geographic Information System (GIS) methods were used to estimate annual storage changes from WY 2023-2025 to support the SGMA requirements for annual reporting. This method utilizes estimates of aquifer properties from the 2022 BVHM and measured changes in groundwater levels. Figure 14 shows the GIS-method estimates of annual storage change as black bars for WY 2023-2025.⁷⁶

In 2021, the Watermaster convened the TAC to reevaluate the second method described above and update the method if deemed appropriate. The TAC recognized the importance of employing a methodology that would produce future results that are consistent from year to year, would minimize the influence of the method itself on the storage change results, and would include QA/QC steps to check on the reasonableness of the results. The agreed upon methodology to estimate the change in storage is documented in a TM (West Yost, 2022c) and is summarized below. At the time of discussion, the TAC recognized that the method currently relied on has limitations and should be re-evaluated following the 2025 Redetermination of the Sustainable Yield, in which results from the 2022 BVHM could be utilized to compare model results against manual calculations, revise the aquifer properties assigned to the storage grid, improve contouring, or make other improvements. In WY 2025, the GIS method was updated to: (i) use aquifer properties from the 2022 BVHM instead of the 2016 BVHM, and (ii) calculate the change in storage over the period of fall-to-fall instead of spring-to-spring (i.e., from the start of each WY instead of in the middle of each WY). The change in storage results from the updated GIS method were compared to results from the 2022 BVHM. The comparison showed that the difference in the estimates from the two methods is small (<1 percent) compared to total Basin storage. Based on this comparison, the Watermaster proceeded with updating the GIS method and using the updated results in the WY 2025 Annual Report and 5-Year Assessment Report.

The information required to estimate storage change in the Basin using the GIS method approved by the TAC includes:

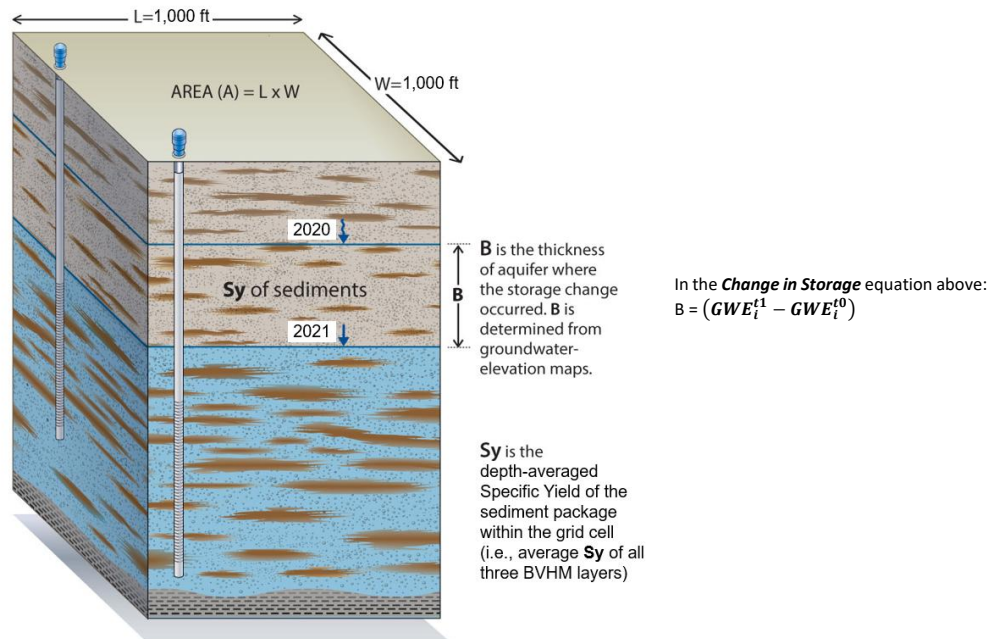
- A groundwater elevation map for fall 2025 (Figure 12).
- A groundwater elevation map for fall 2024 (Figure 15).
- A uniform grid of 1,000 ft by 1,000 ft cells superimposed over the Basin area to assign groundwater elevations from Figures 12 and 15 and aquifer storage properties (Figure 16). The aquifer storage properties (i.e., specific yield) were derived from the 2022 BVHM.

⁷⁶ Each year, the TAC and the Board review the storage-change estimates produced by the GIS method and have concluded that the results reflect the expected changes in storages based on the measured hydrologic conditions that occurred in the Basin, the metered pumping data, and the measured groundwater elevations; and therefore, are appropriate for the annual reporting to the DWR.

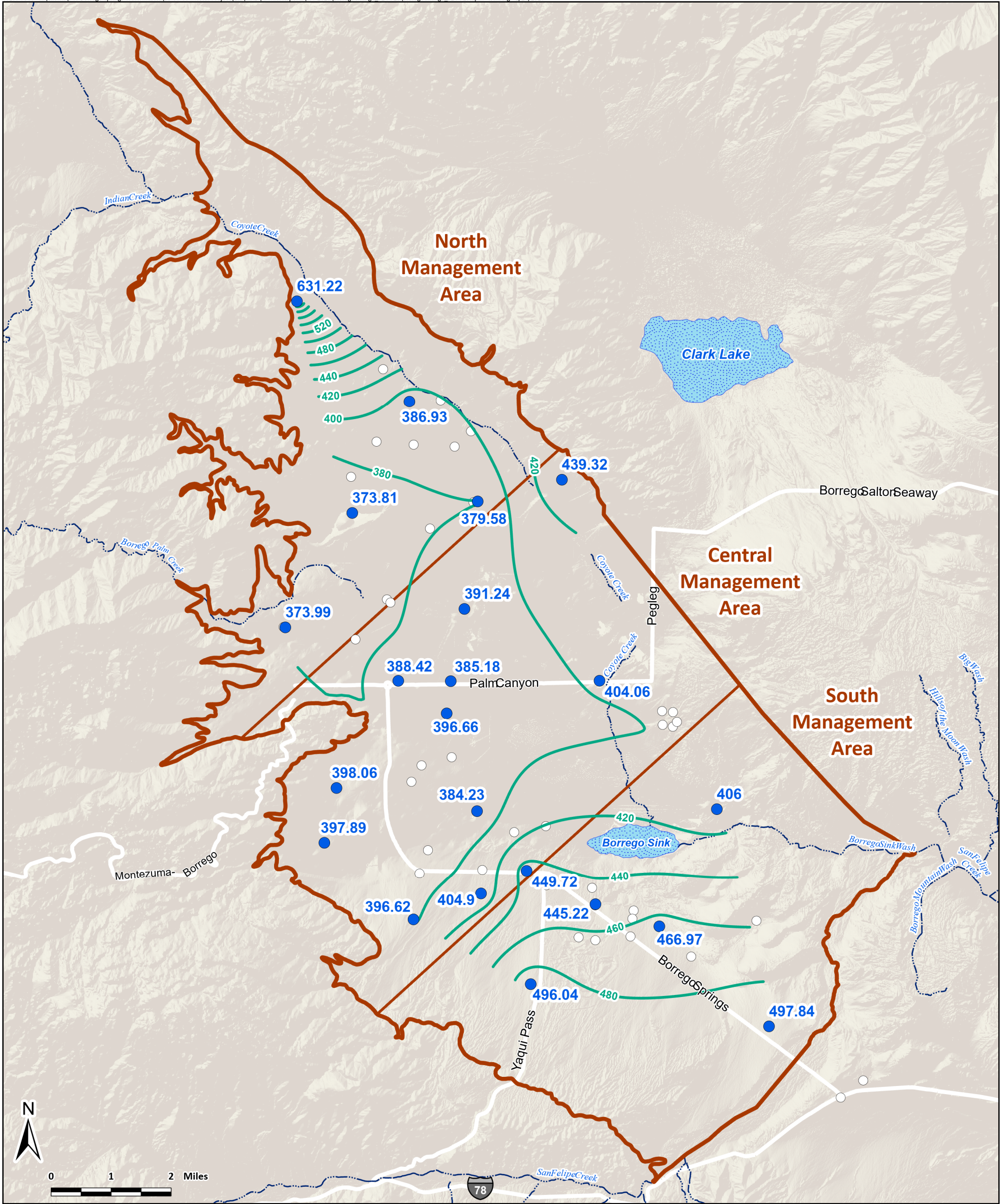
The annual change in storage is calculated at the grid-cell level using the following equation:

$$\text{Change in Storage}_i = (GWE_i^{t1} - GWE_i^{t0}) \times S_{y_i} \times A$$

where, i represents a unique cell within the storage change calculation grid, GWE is the interpolated groundwater elevation at cell i , S_y is the specific yield defined at cell i , A is the area of each cell, and $t1$ and $t0$ are the two years between which storage change is calculated.



The sum of the change in storage values by grid cell provides an estimate of the total annual change in groundwater storage in the Basin.



Groundwater Monitoring Wells Used to Develop Groundwater Elevation Contours for Fall 2024

- 350 ● True static groundwater elevation (ft-amsl)
- 350 ○ Estimated static groundwater elevation (ft-amsl)

Groundwater Elevation Contours Fall 2024 (ft-amsl)



Other Features

- Borrego Springs Subbasin with Management Area Divisions
- Other Groundwater-Level Monitoring Wells

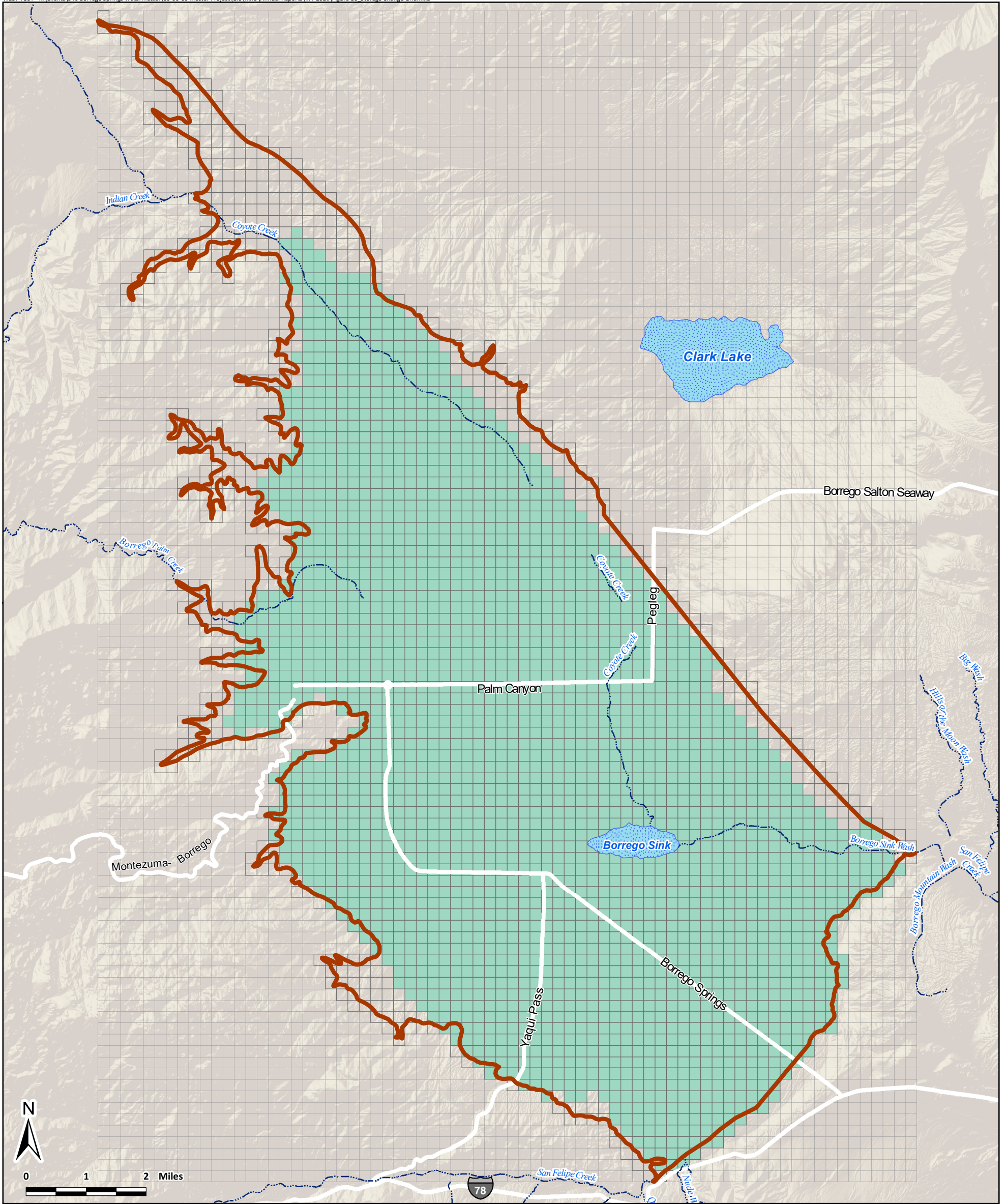
Surface Water Features


- Stream Channel
- Dry Lake




Figure 15


Fall 2024 Groundwater Elevation




 Storage Change Grid
(1000 ft x 1000 ft cell)

 Borrego Springs Groundwater Subbasin (7-024.01)

Surface Water Features

 Stream Channel

 Dry Lake


 Grid Cells Used to Compute Storage Change



Figure 16

Storage Change Grid and Area Used to Compute Storage Change

Borrego Springs Watermaster
Borrego Springs Subbasin
2025 Annual Report

Prepared by:



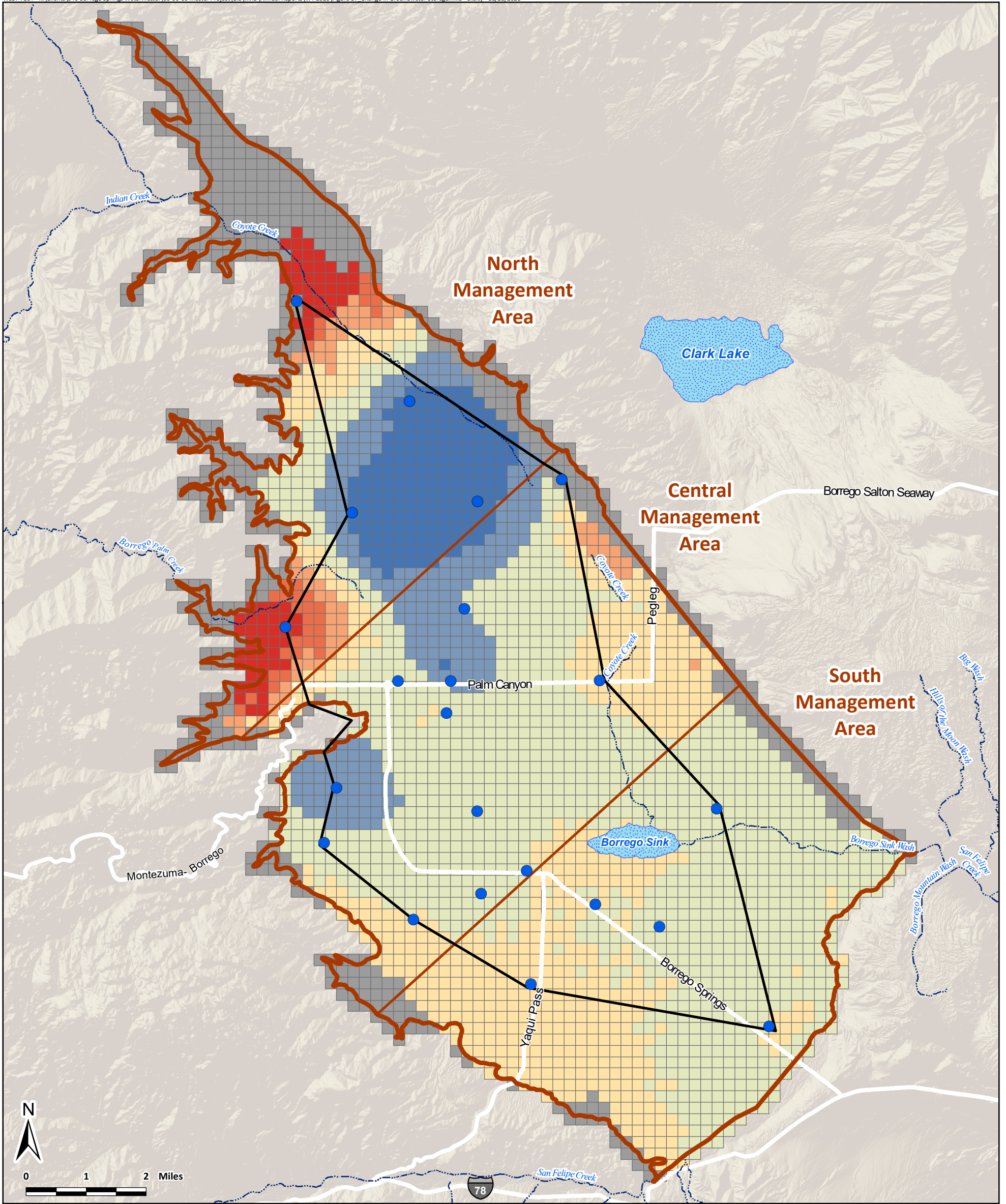
5.5.2.3 Annual and Cumulative Change in Storage

Figure 17 is a map that shows the spatial distribution of the change in groundwater storage from fall 2024 to fall 2025. Also shown on Figure 17 are the wells with representative groundwater elevation data in both fall 2024 to fall 2025 that were used to estimate the change in storage. The total change in storage from fall 2024 to fall 2025 was approximately -1,826 af (a decrease of groundwater in storage). Storage declined most in the CMA and SMA but increased in the NMA. This change in storage is consistent with the observation in Section 5.5.1 that groundwater levels across most of the Basin continued to decline through WY 2025. However, the rate of storage change continued to decrease in fall 2024 to fall 2025 compared to the previous ten-year period (see Figure 18 and Table 22).

The reduced rate of storage decline is consistent with Basin-wide reductions in groundwater pumping during WY 2025, particularly in the NMA, where the largest pumping decreases corresponded to localized increases in groundwater levels and storage. In contrast, areas with slight increases in pumping, such as portions of the SMA, experienced continued localized declines in storage in WY 2025. Climatic factors, including precipitation (Figure 5) and surface water inflows (Figure 6b), were relatively similar in WY 2025 to prior years (with the exception of the wetter WY 2023), indicating that changes in storage in WY 2025 were primarily influenced by pumping patterns rather than climatic variability. When viewed over the longer SGMA implementation period (WY 2015 through WY 2025), groundwater storage has declined continuously; however, the rate of decline has gradually slowed over time. This trend is attributed primarily to reductions in groundwater pumping under the Rampdown and suggests that Basin storage conditions are trending toward stabilization as management actions continue to take effect.

Table 22 summarizes the annual and cumulative change in storage for WY 2015 to WY 2025, as required by the SGMA annual reporting requirements, and the method used to calculate the change in storage using the BVHM vs. GIS method. As shown in Table 22, the total volume of groundwater in storage decreased by approximately 73,530 af over the ten-year period. Figure 18 is a time-series chart that compares the annual and cumulative change in storage with annual groundwater pumping from 2015 through 2025.

Table 22. WY 2015 to WY 2025 - Annual and Cumulative Change in Groundwater, af				
WY	Period	Storage Change Method	Annual Change in Storage	Cumulative Change in Storage
2015	Fall 2014 to Fall 2015	BVHM	-12,555	-12,555
2016	Fall 2015 to Fall 2016	BVHM	-13,276	-25,832
2017	Fall 2016 to Fall 2017	BVHM	-9,063	-34,895
2018	Fall 2017 to Fall 2018	BVHM	-11,808	-46,703
2019	Fall 2018 to Fall 2019	BVHM	-5,173	-51,876
2020	Fall 2019 to Fall 2020	BVHM	-4,371	-56,247
2021	Fall 2020 to Fall 2021	BVHM	-6,971	-63,218
2022	Fall 2021 to Fall 2022	BVHM	-4,839	-68,057
2023	Fall 2022 to Fall 2023	GIS	-621	-68,678
2024	Fall 2023 to Fall 2024	GIS	-3,026	-71,704
2025	Fall 2024 to Fall 2025	GIS	-1,826	-73,530



Groundwater Monitoring Wells with Measured Groundwater Elevation in Fall 2024 and Fall 2025

- True static groundwater elevation (ft-amsl)
- Estimated static groundwater elevation (ft-amsl)

Groundwater Storage Change

Fall 2024 to Fall 2025 (af)

	> - 4		-1 to 0
	-4 to -3		0
	-3 to -2		0 to 1
	-2 to -1		1 to 2

Other Features

- ▭ Storage Change Mask
- ▭ Borrego Springs Groundwater Subbasin (7-024.01)

Surface Water Features

- Stream Channel
- ▭ Dry Lake



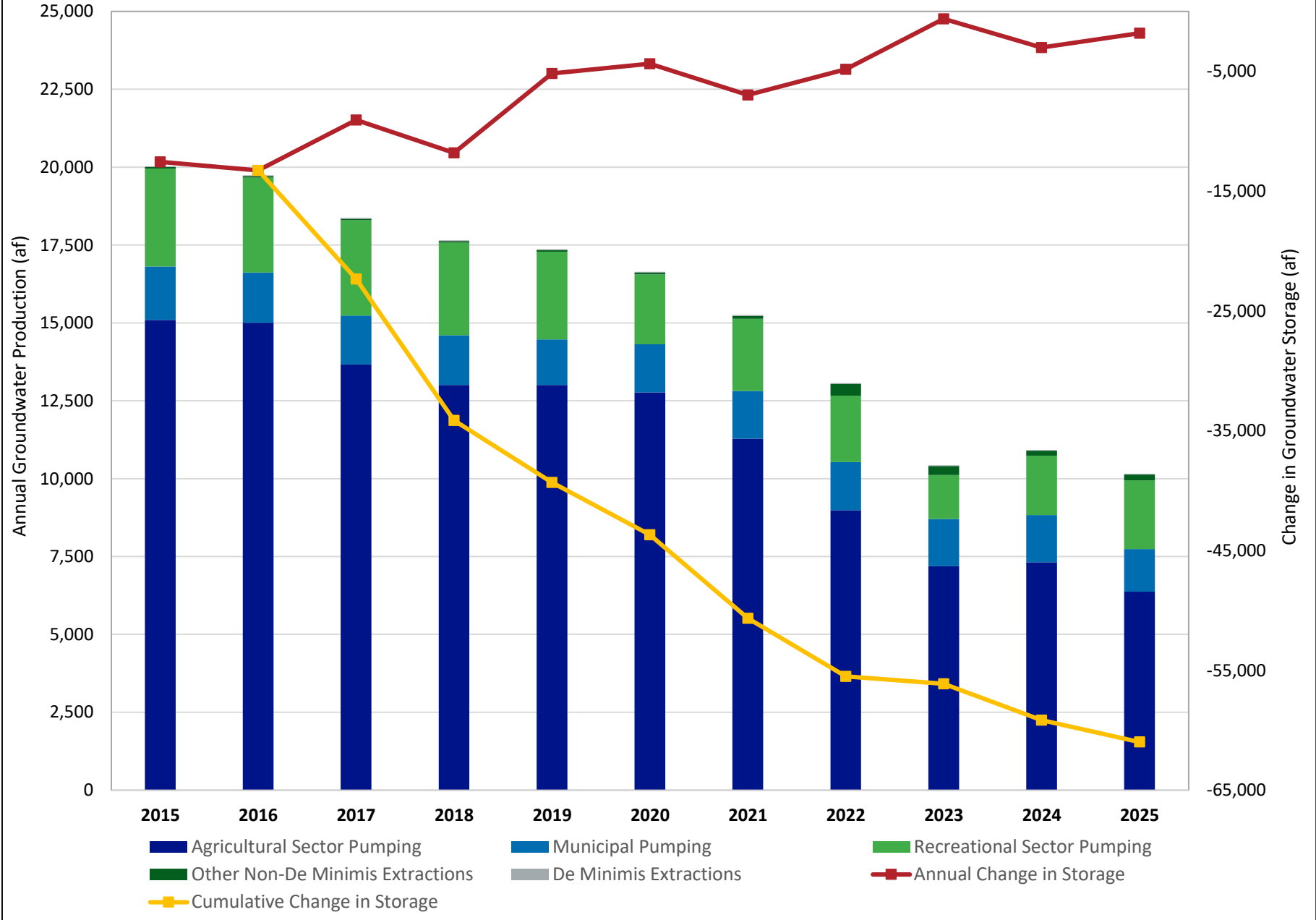
Prepared by:



Figure 17

**Change in Groundwater Storage
Fall 2024 to Fall 2025**

Figure 18. Annual Groundwater Pumping and Change in Groundwater Storage – 2015 to 2025



5.5.2.4 Comparison to Sustainable Management Criteria

The 2020 GMP defines an Undesirable Result for groundwater storage as a decline in storage that reduces the rate of production at pre-existing groundwater wells below that needed to meet the minimum required to support the overlying beneficial use(s), and where means of obtaining sufficient groundwater or imported resources 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).

Changes in groundwater storage are highly 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 groundwater elevations by using the results from the BVHM. Specifically, the Minimum Threshold for groundwater in storage in the 2020 GMP were based on (i) on model projections of groundwater storage changes expected to occur through 2040, and (ii) the variability of climate and groundwater recharge.⁷⁷ The Minimum Threshold for reduction in groundwater storage in the 2020 GMP is a cumulative reduction of about 144,000 af from 2020 to 2040, the equivalent of about -7,200 afy.

Figure 14 shows the 2020 GMP Minimum Threshold for reduction in groundwater storage compared to the measured cumulative storage change that occurred from fall 2020 to fall 2025, which was a reduction in storage of about -17,283 af, or about -3,457 afy. The measured cumulative storage change and rate of storage change are significantly less than the Minimum Threshold. In addition, the rate of storage change is decreasing. Hence, the Basin is not projected to exceed the Minimum Threshold in the 2020 GMP for reduction in groundwater storage over the planning and implementation horizon.

5.5.3 Groundwater Quality

This section describes the historical trends and current conditions for groundwater quality for the five constituents of concern (COC) in the 2020 GMP through WY 2025 and compares the trends and current conditions to the relevant primary and secondary maximum contaminant levels (MCL)⁷⁸ for each COC, which are the Minimum Thresholds defined in the 2020 GMP.

5.5.3.1 Historical Trends

Historically, groundwater quality was routinely monitored by the BWD at municipal supply wells, with additional monitoring activities conducted by the DWR and the USGS at various other wells. Based on the monitoring results, the GMP identified five COCs in the Basin: total dissolved solids (TDS), nitrate, arsenic, sulfate, and fluoride. The COCs are sourced from both anthropogenic and natural sources in the Basin. Anthropogenic sources of these COCs include use of pesticides and fertilizers, irrigation practices that result in concentrated return flows to the aquifer system, and septic system return flows (Dudek, 2020a). Natural sources of these COCs are dissolution of aquifer-system sediments which contain evaporites, silicates, fluoride-bearing minerals, and sulfates (Dudek, 2020a). Evaporation and evapotranspiration of shallow groundwater by phreatophytes can also concentrate dissolved constituents in groundwater.

⁷⁷ The Minimum Threshold for the depletion of groundwater in storage is presented in Section 3.3.2 of the 2020 GMP.

⁷⁸ MCLs are standards for groundwater quality set by the U.S. EPA and the California State Water Resources Control Board. An MCL is the legal threshold limit for the amount of a substance that is allowed in public water systems under the Safe Drinking Water Act (Federal and State).

Historical publications on groundwater quality have noted the following observations and trends:

- The highest concentrations of nitrate and TDS are found in the upper aquifer, primarily in the northern portion of the Basin, where most agricultural activities occur (Faunt et al., 2015).
- Increases in TDS and sulfate concentrations were associated with groundwater-elevation declines (Faunt et al., 2015).
- Increases in arsenic concentrations were associated with groundwater-elevation declines in the SMA (Dudek, 2020a).
- High concentrations of TDS and sulfate have been observed in groundwater near the Borrego Sink (Dudek, 2020a).
- Fluoride concentrations in the Basin are typically below the MCL (Dudek, 2020a).

5.5.3.2 Comparison to Sustainable Management Criteria and Current Trends

The 2020 GMP established narrative Minimum Thresholds for groundwater quality to protect existing and potential beneficial uses and establishes separate Minimum Thresholds for municipal/domestic wells and agricultural wells. For municipal and domestic wells, the goal is for groundwater quality to meet potable drinking water standards specified in Title 22 of the CCR (e.g., MCL). For irrigation wells, the goal is for groundwater quality to meet standards that are “suitable for agriculture use.” In terms of the standards suitable for agricultural use, specific concentrations for each COC were not explicitly defined in the 2020 GMP. As part of the 5-year Assessment, more specific Minimum Thresholds for agriculture wells will be considered and recommended. Because of the lack of quantified Minimum Thresholds in the 2020 GMP to compare against current conditions of groundwater quality in agricultural wells, groundwater quality for all wells in the Basin are compared to MCLs in this Annual Report.

Since the implementation of the GMP, the Watermaster has collected and analyzed groundwater-quality samples on a semi-annual frequency from wells in the groundwater-quality monitoring network (see well locations on Figure 3). The groundwater-quality data are used to describe current conditions and seasonal and/or long-term trends in groundwater quality for the COCs in the Basin. In WY 2025, groundwater-quality samples were collected in October 2024 and March 2025 (see Table 8). Following each monitoring event, Watermaster staff prepared a summary of the monitoring results and presented it to the Board. The results from the spring 2025 semi-annual sampling event are shown in Table 24 and Figures 19 through 23, where they are also compared to primary or secondary MCLs.

Table 23 summarizes the number of groundwater quality sample results that exceeded a California primary or secondary drinking water standard (e.g., MCL, reported in milligrams per liter [mg/L]) in spring 2025, organized by well beneficial use type (e.g., public supply, non-potable irrigation, or observation). The number of exceedances of groundwater quality standards observed in spring 2025 is similar to results in previous sampling events. For newer wells to the monitoring program that have only been monitored for a year or two, it is too soon to draw conclusions about trends.

Table 23. Spring 2025 - Summary of Exceedances of Groundwater Quality Standard by COC and Well Type

COC	MCL Type	MCL, mg/L	Number of Drinking Water Wells with Exceedance	Number of Non-Potable Water Wells with Exceedance ^(a)	Number of Observation Wells with Exceedance
TDS ^(b)	CA Secondary MCL – recommended limit	500	3	7	9
TDS ^(c)	CA Secondary MCL – upper limit	1,000	0	3	2
Nitrate (as N)	CA Primary MCL	10	0	5	0
Arsenic	CA Primary MCL	0.01	0	3	0
Sulfate	CA Secondary MCL	250	1	7	8
Fluoride	CA Primary MCL	2	0	0	1

mgl = milligrams per liter

(a) Non-potable wells are wells used for irrigation and/or “other” purposes. These wells are not used for drinking water (potable) supplies.

(b) Wells shown exceeding the CA Secondary MCL – lower limit are wells with TDS results greater than 500 mgl, but less than 1,000 mgl (less than the CA Secondary MCL – upper limit).

(c) Wells shown exceeding the CA Secondary MCL – upper limit are wells with TDS results greater than 1,000 mgl. This row does not include wells that exceeded the CA Secondary MCL – lower limit.

Figures 19 through 23 characterize groundwater quality in the NMA, CMA, and SMA for the five COCs. Each figure includes:

- A map that illustrates the spatial distribution of the COC concentrations at all wells sampled in spring 2025.
- Time-series charts of historical COC concentrations at selected wells in each of the Management Areas. The primary or secondary MCL are also plotted on each time-series chart.

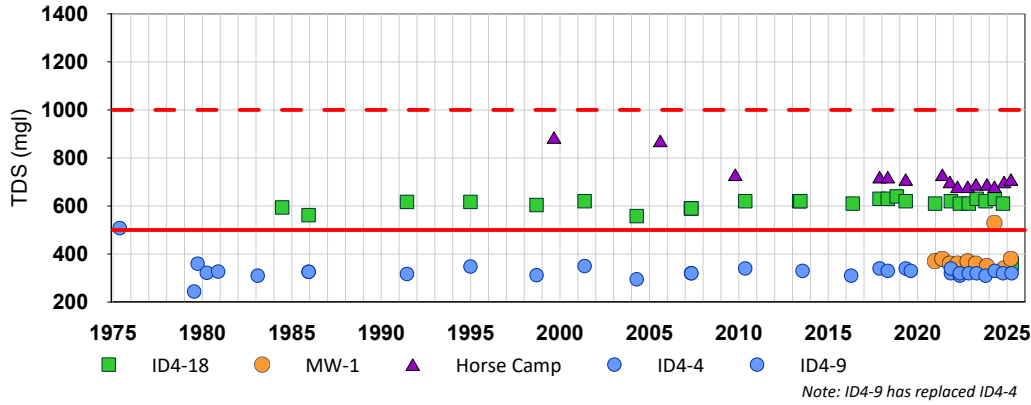
Appendix H contains time history charts of the historical concentration of the five COCs identified in the 2020 GMP for each Representative Monitoring Well for the period of record from 1970 through 2025. The primary and/or secondary MCL for each COC is also plotted on each figure. Where known, the figures also display the well depth and the well screen depth intervals.

The following observations are made from these figures and Table 23:

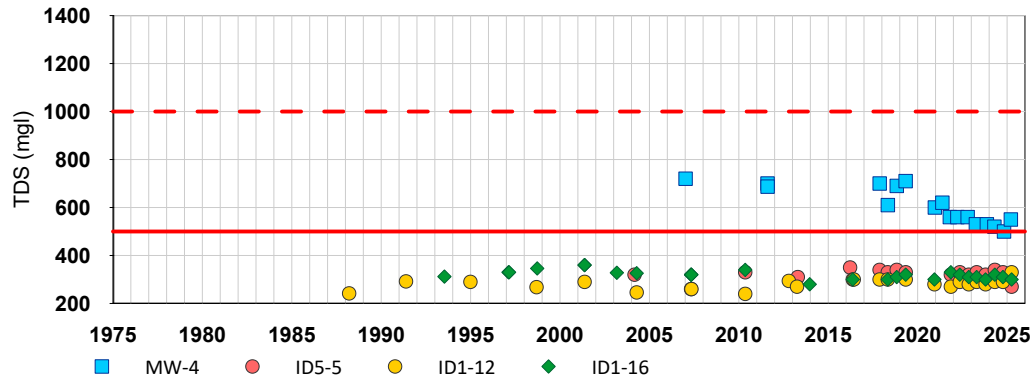
- TDS concentrations are highest in the NMA, SMA, and near the Borrego Sink (Figure 19). The “recommended” level for the California secondary MCL of 500 mg/L was exceeded at 19 wells across the Basin, only three of which are used for potable water supply. The “upper” level for the California secondary MCL of 1,000 mg/L was exceeded at five wells across the Basin, none of which are used for potable water supply.
- The highest concentrations of nitrate (as nitrogen) were measured in the NMA and CMA (Figure 20). The primary MCL of 10 mg/L was exceeded at five wells; however, none of these wells are used for potable water supply.
- The highest concentrations of arsenic were measured in the SMA (Figure 21). The primary MCL of 10 micrograms per liter (µg/L) (or, 0.01 mg/L) was exceeded at three wells, all of which are non-potable irrigation wells.

- The highest concentrations of sulfate occurred in the NMA and near the Borrego Sink (Figure 22). The secondary MCL of 250 mg/L for sulfate was exceeded in 16 wells across the Basin, only one of which is used for potable water supply.
- Fluoride concentrations are generally the same across all Management Areas (Figure 23). One observation well in the NMA exceeded the primary MCL of 2 mg/L for fluoride.

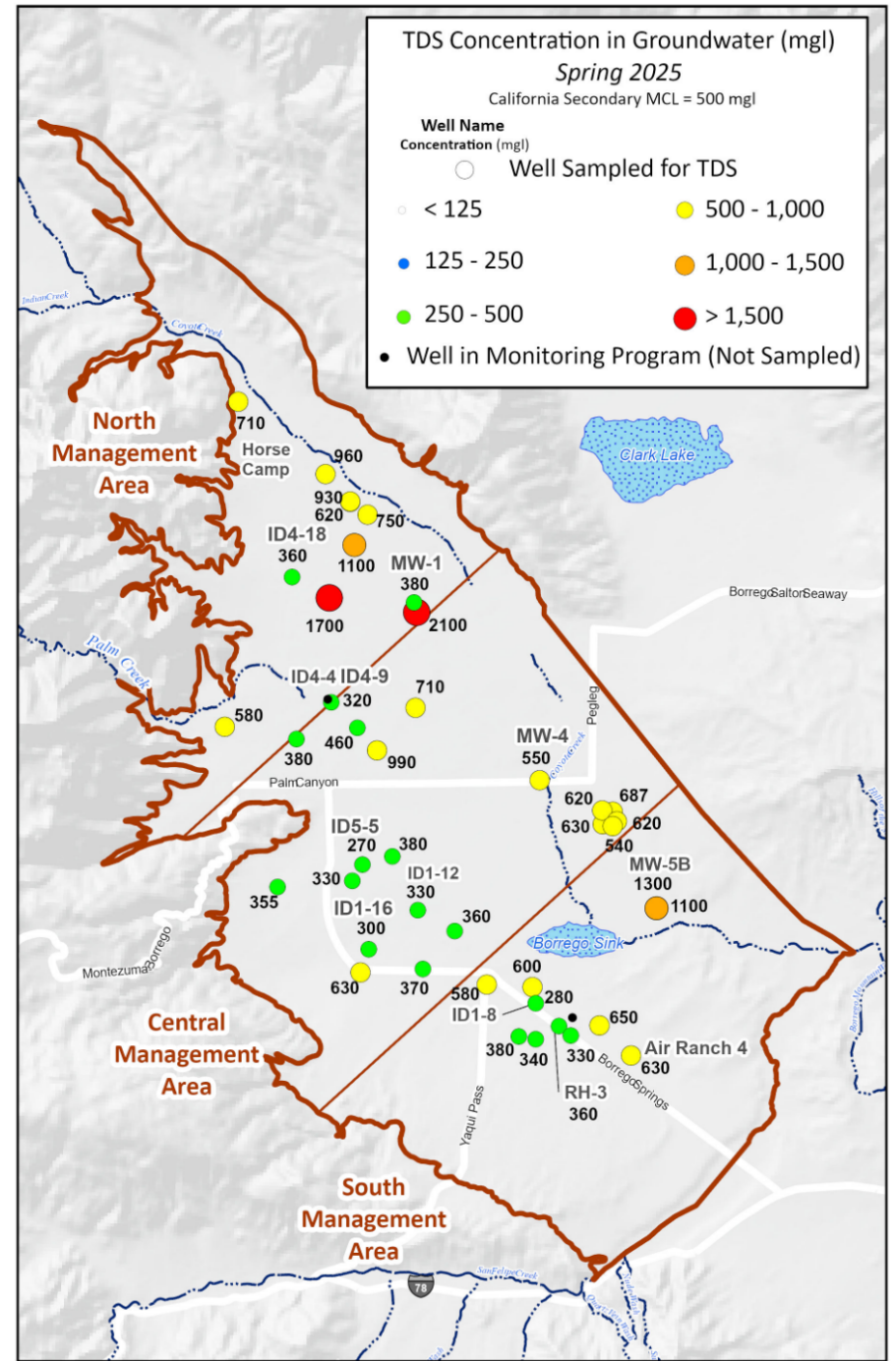
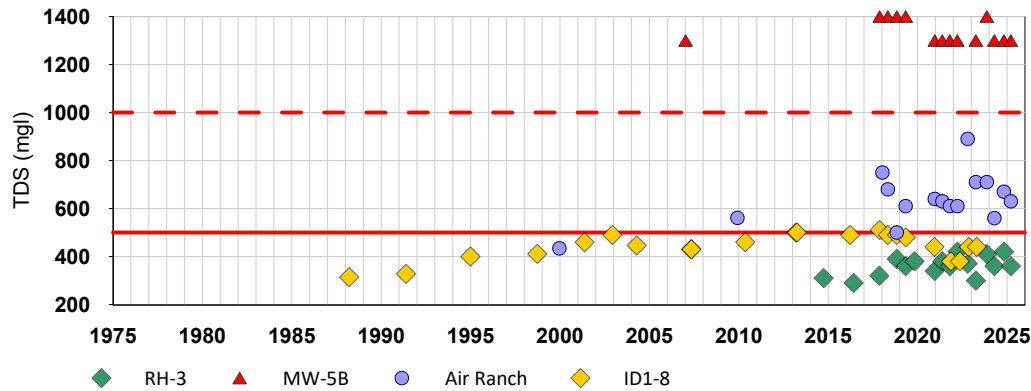
North Management Area



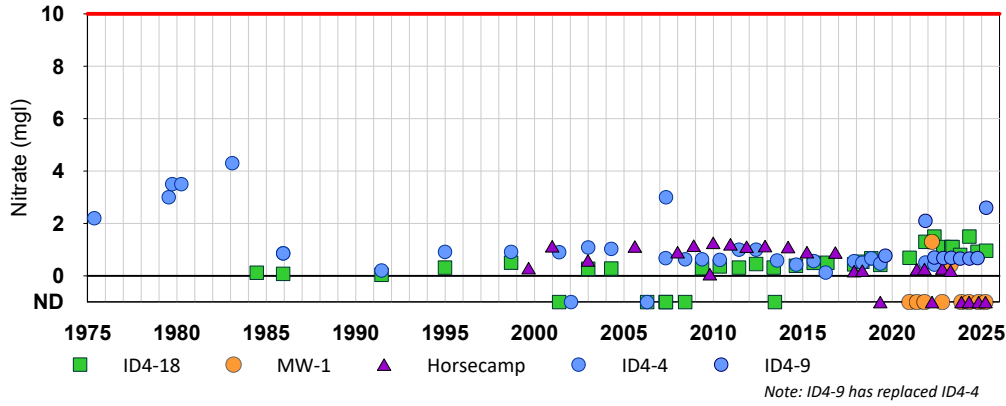
Central Management Area



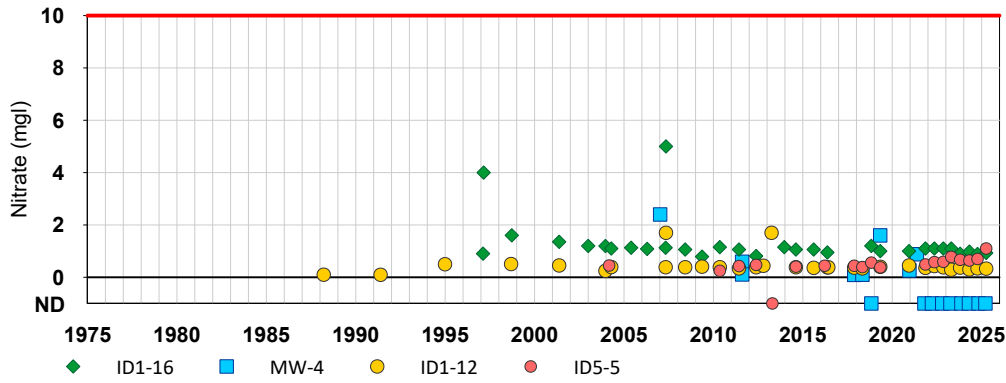
South Management Area



North Management Area



Central Management Area



South Management Area

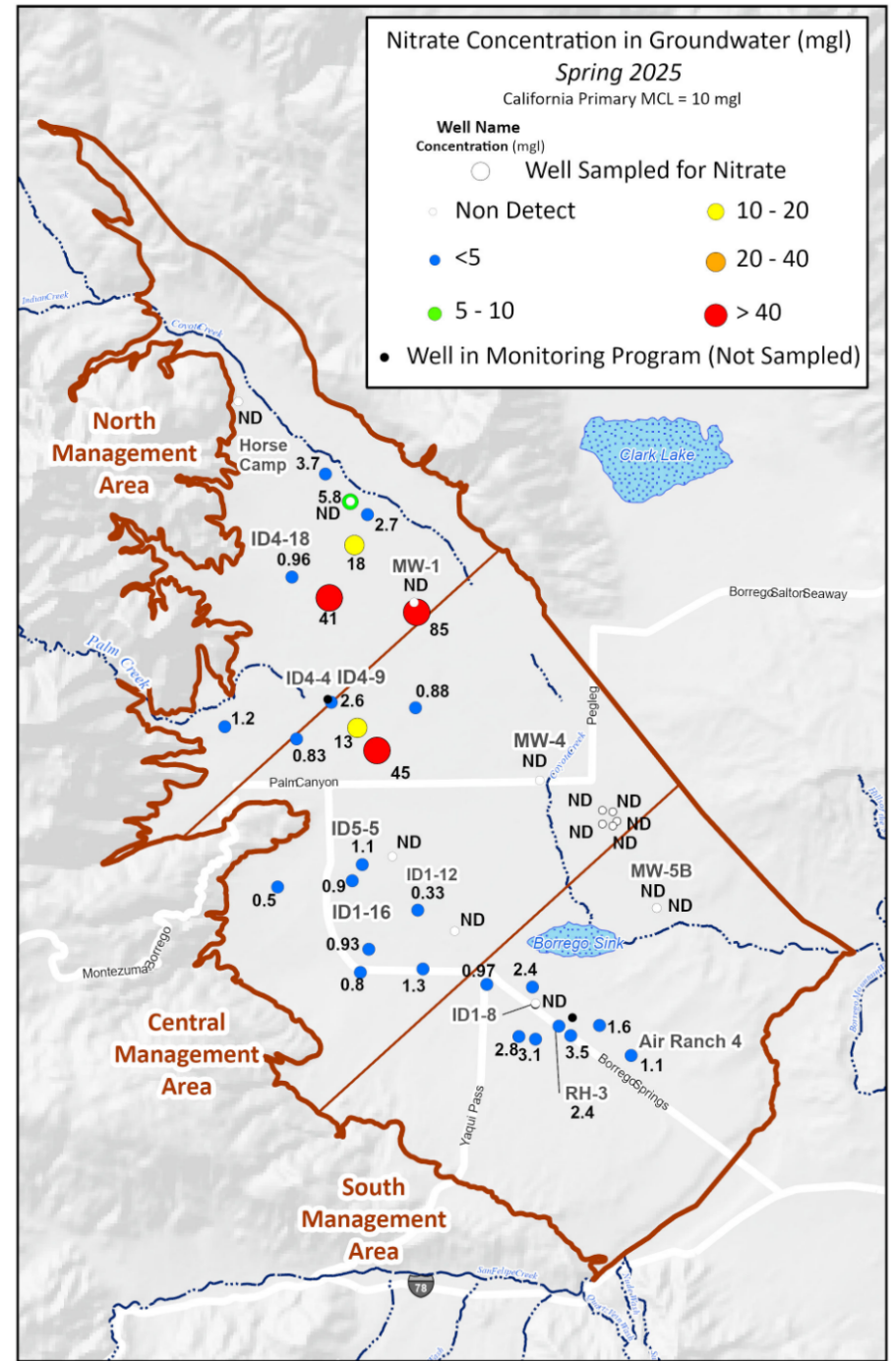
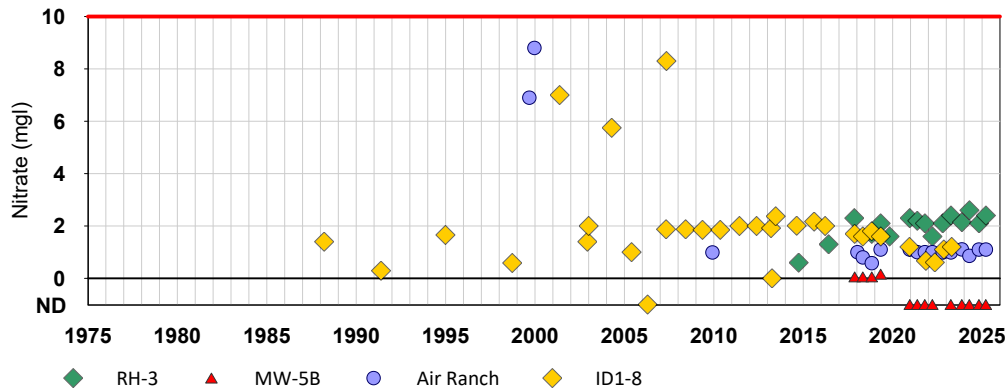
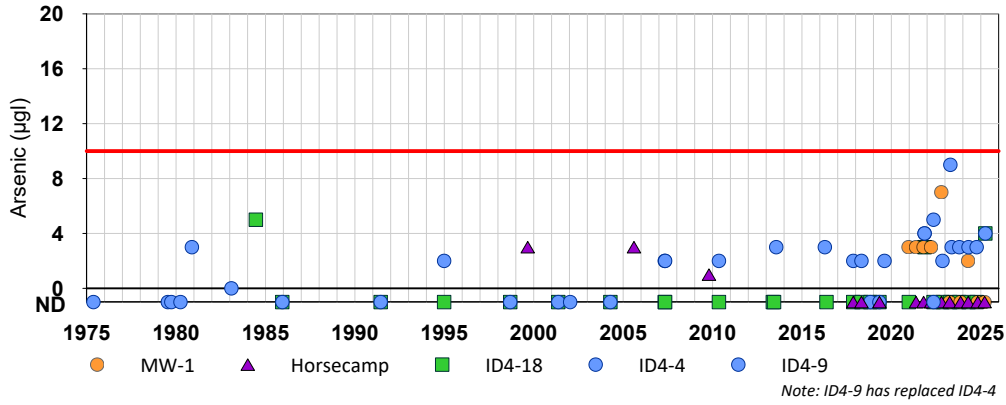


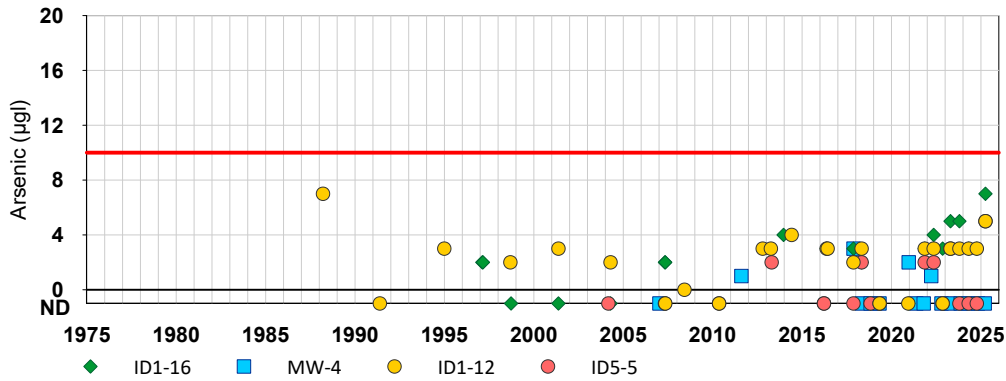
Figure 20

Nitrate (as Nitrogen) in Groundwater

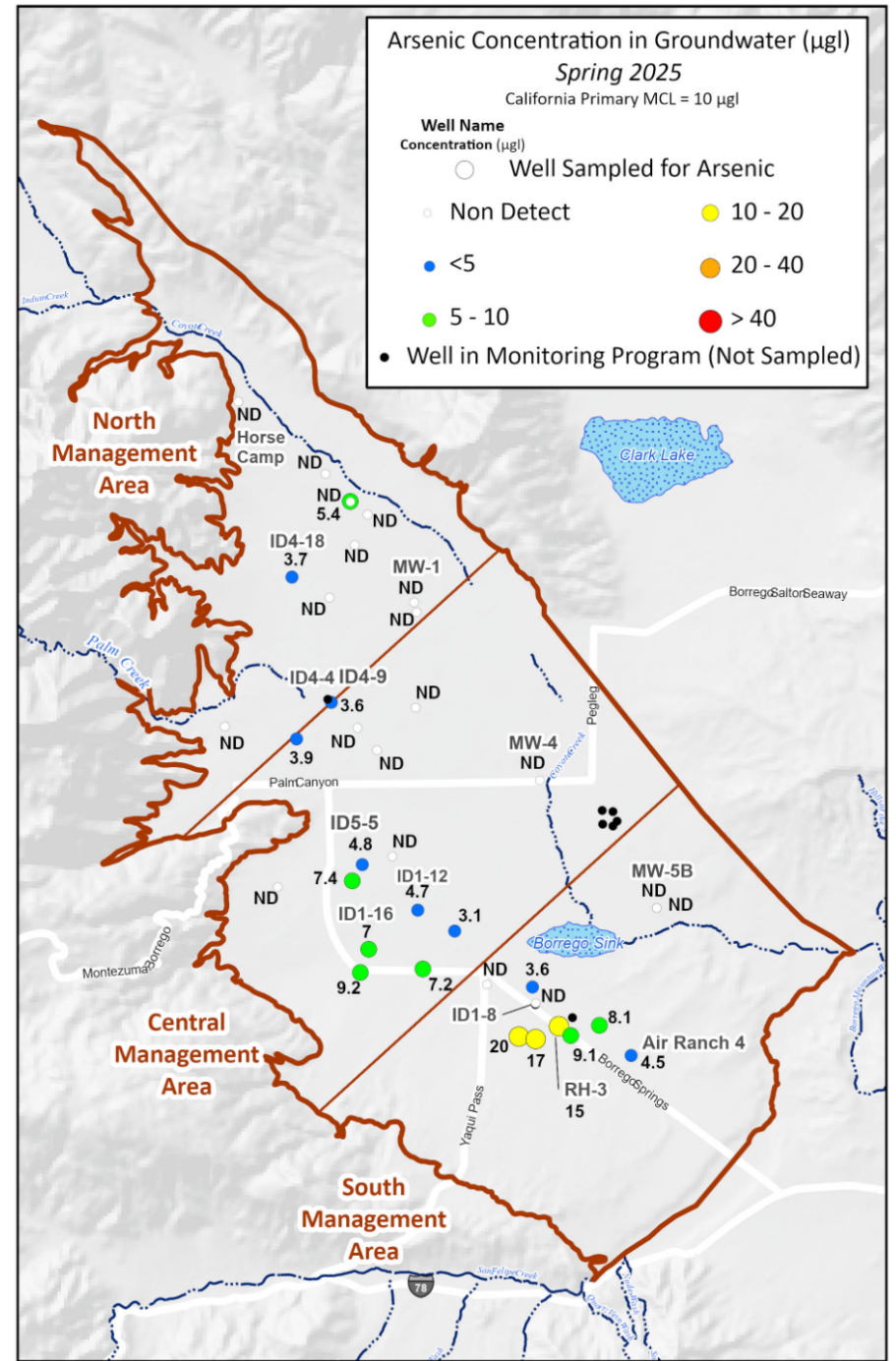
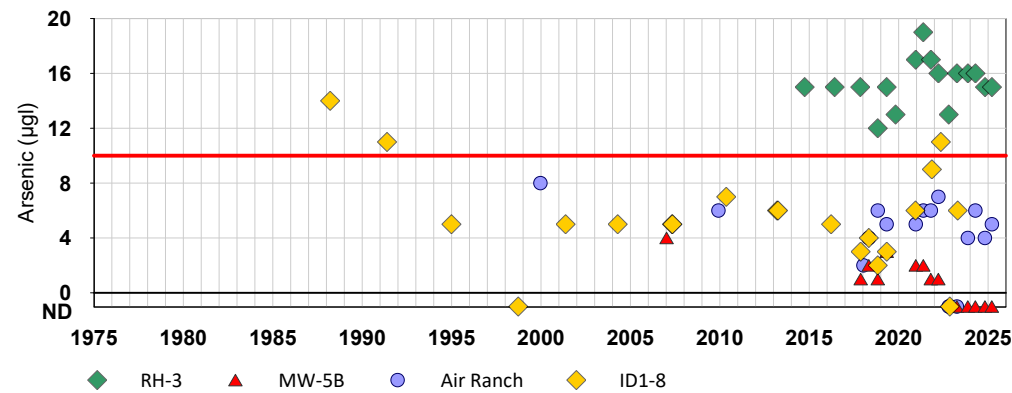
North Management Area



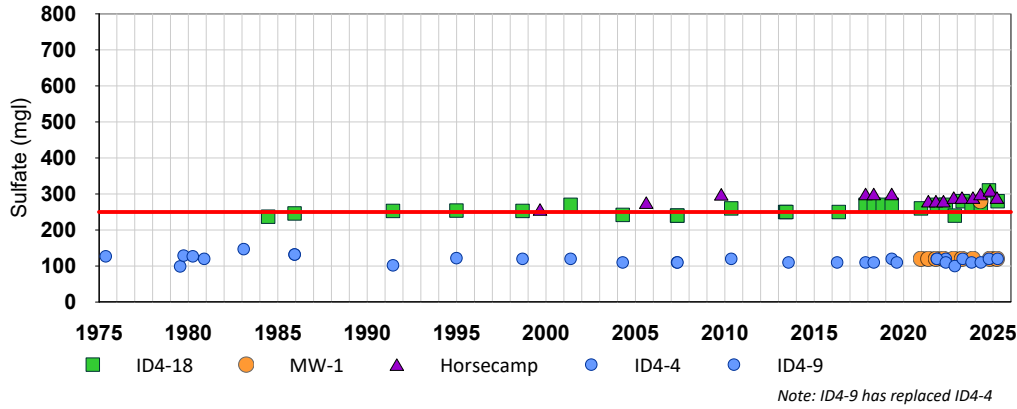
Central Management Area



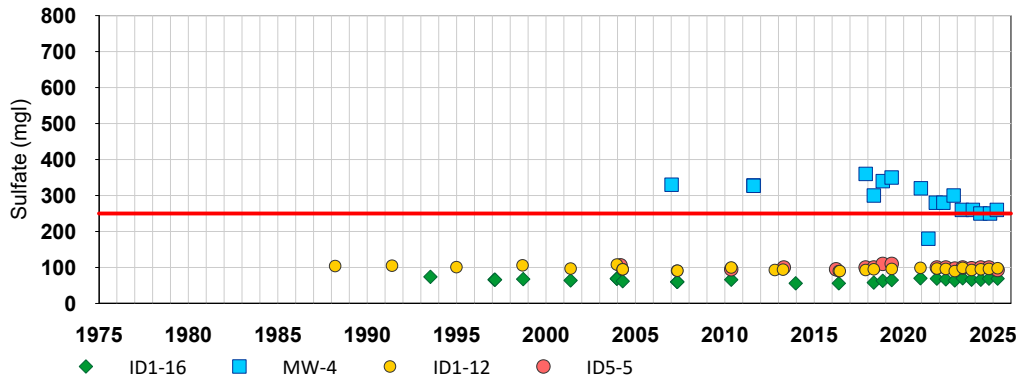
South Management Area



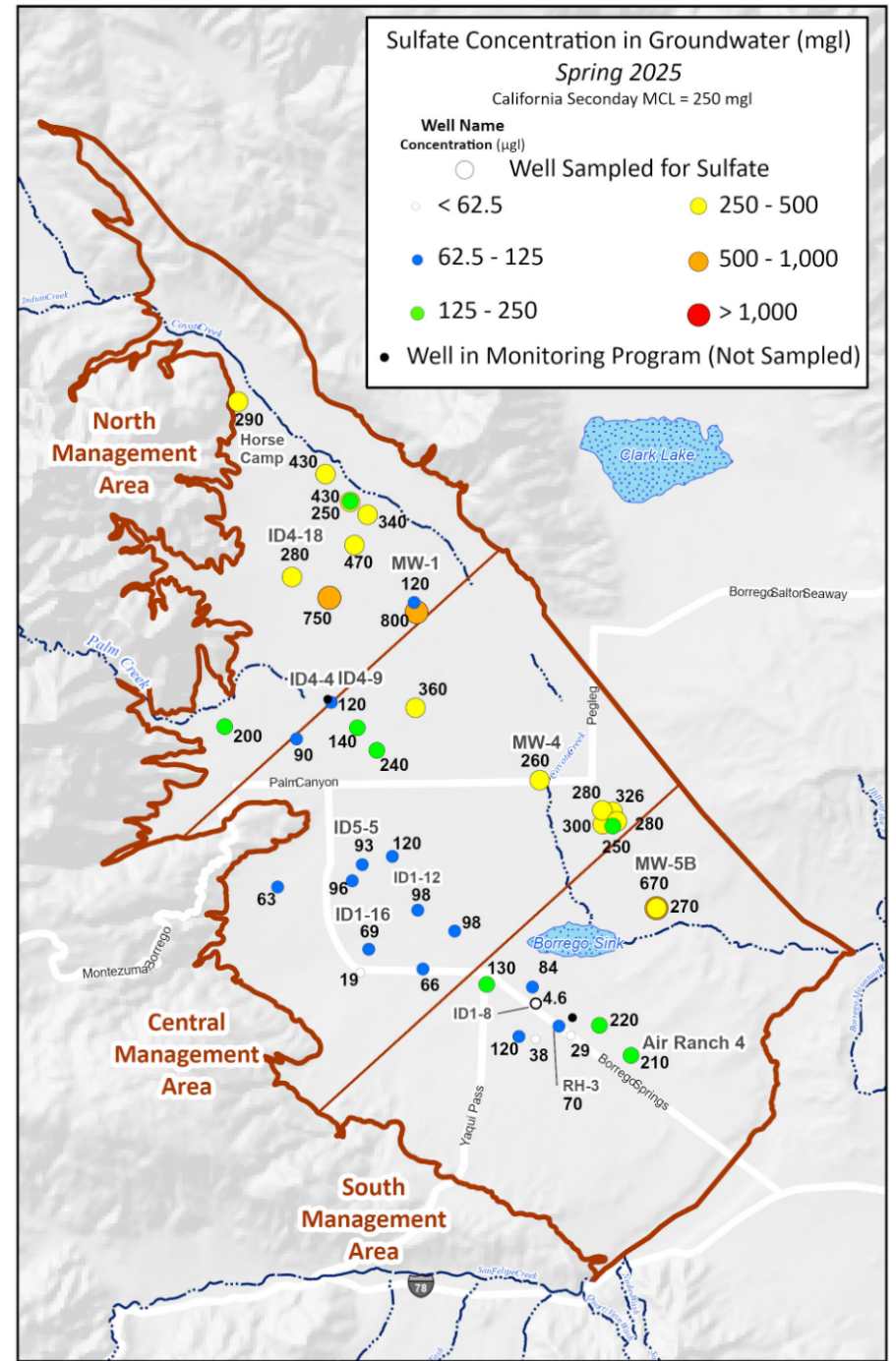
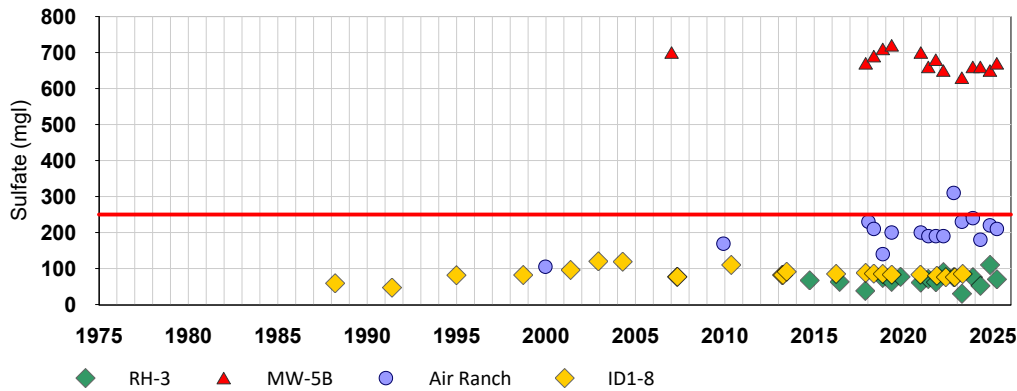
North Management Area



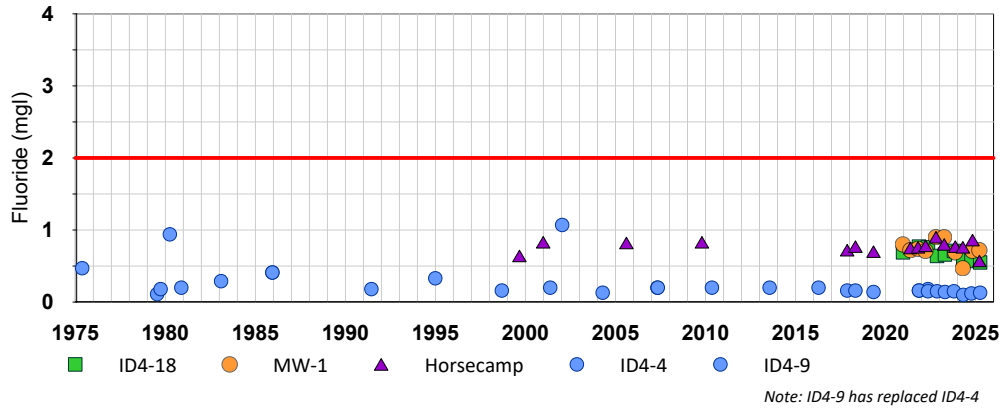
Central Management Area



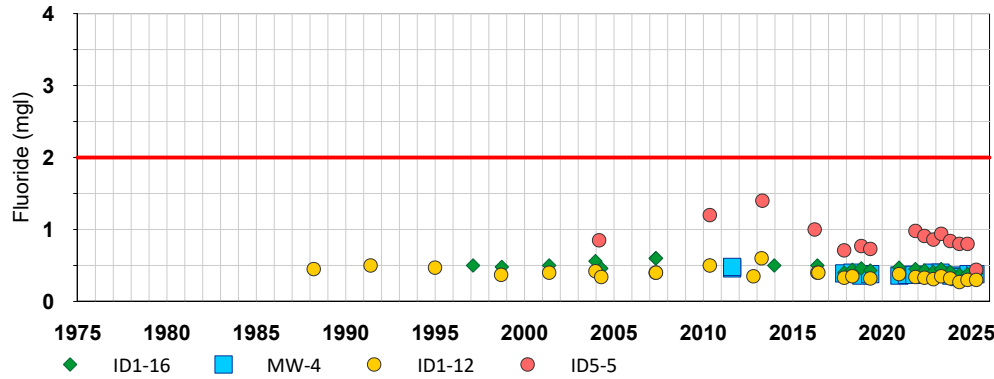
South Management Area



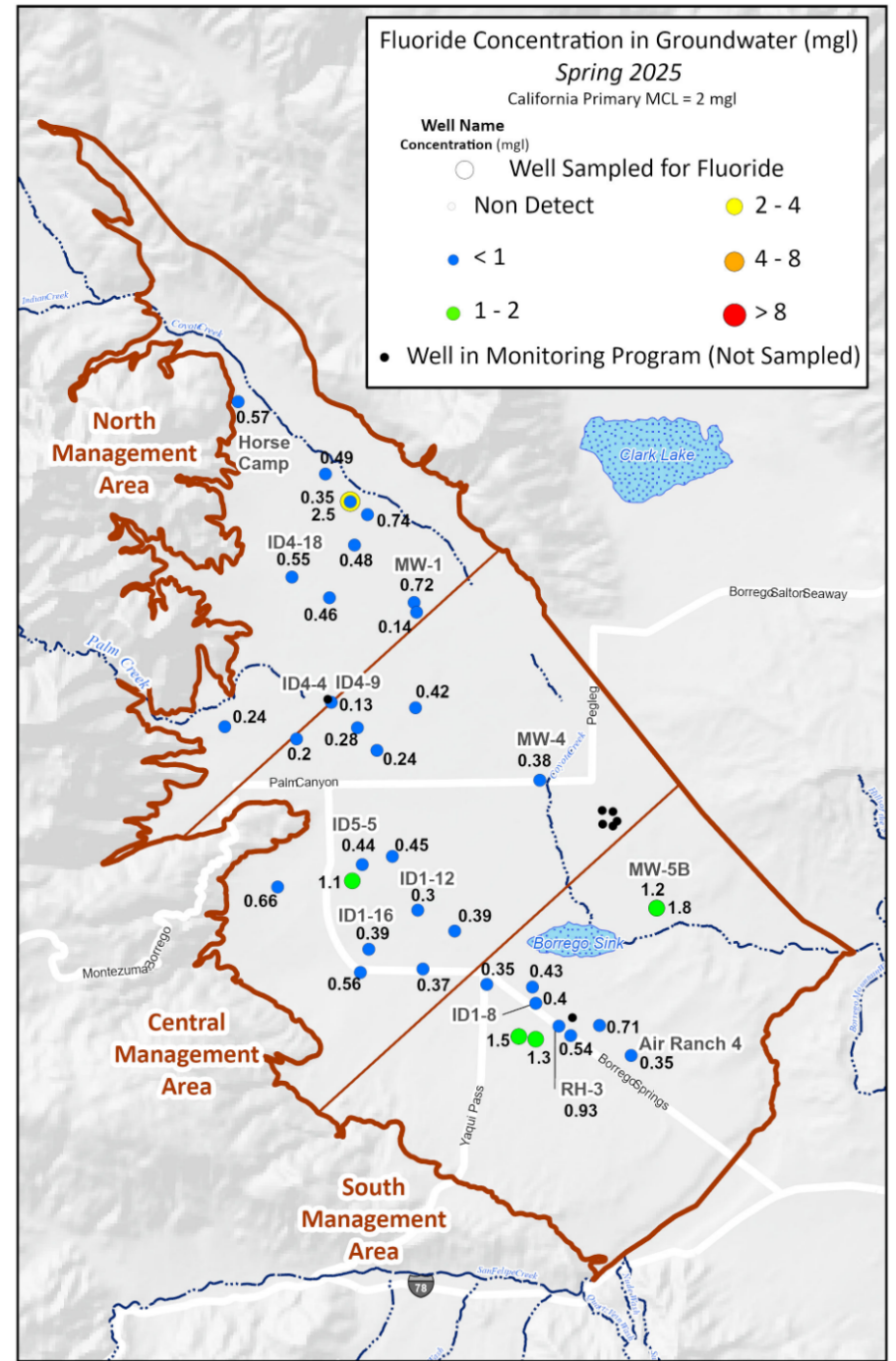
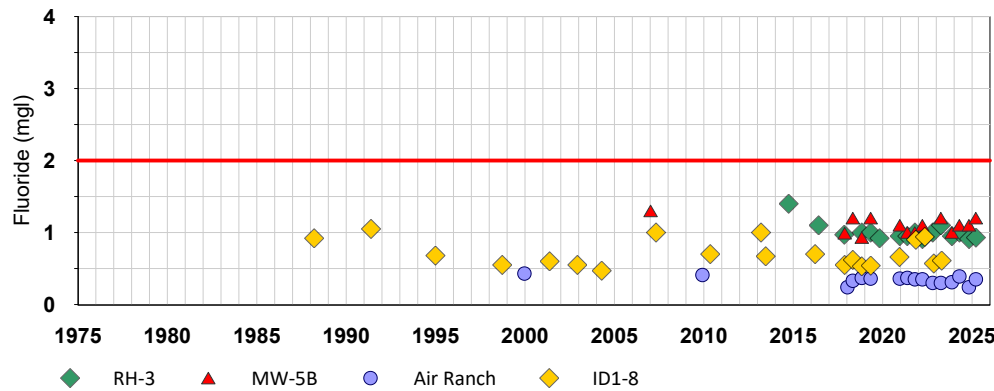
North Management Area



Central Management Area



South Management Area



6.0 SUMMARY OF PHYSICAL SOLUTION IMPLEMENTATION PROGRESS

As described in Section 1, the entry of the Judgment prescribing a Physical Solution for the Basin represents the most important milestone in achieving groundwater sustainability within the Basin by 2040 and the Watermaster has made substantial progress in the initial years of implementation. The interim Watermaster was formed in March 2020, became the permanent Watermaster on April 8, 2021, and since inception has held 78 regular or special meetings of the Board through the reporting period to advance the implementation of the Judgment.

The following are some of the key milestones accomplished since the formation of the Watermaster through WY 2025:

- Submitted and received approval of the Judgment and GMP (the Physical Solution) as an Alternative Plan under SGMA.
 - The initial submission of the Alternative Plan was made to the DWR in January 2020
 - Submitted the updated GSP Alternative Elements Guide to DWR following entry of the Judgment by the Court in June 2021
 - Received DWR approval of the Alternative Plan on February 25, 2025
- Administrative milestones:
 - Hired administrative and technical staff to support the implementation of the Judgment (April through August 2020)
 - Established a bank account and issued pumping assessments to fund the implementation of the Judgment (October to November 2020)
 - Established (November 2020) and maintained a website
 - Established the first Operating Budget in accordance with the Judgment for WY 2022 (July 2021) and set annual operating budgets each year thereafter
 - Convened a TAC to support the development and implementation of the technical scope of work included in the Judgment in October 2020 and held 26 meetings since convening
 - Convened an EWG in February 2021 to address specific environmental issues related to groundwater management in the Basin and held 11 meetings since convening
 - Completed water rights accounting for the first full WY (2021) of operations (November 2021) and have performed annual accounting each WY since
 - Established an application process in coordination with the County for the review and approval of new and replacement well applications (December 2021)
 - Submitted an application (February 2022), were selected to receive funding from the DWR SGM grant (May 2022), and used grant funding to implement projects in the Basin through the end of the grant period (March 2025)
 - Held first Open House for interested stakeholders to improve communication of Watermaster activities and technical information in December 2022 and held five Open Houses since

- Groundwater metering milestones:
 - Published a list of approved meters (March 2020)
 - Approved protocols for meter verification and accuracy testing (August 2020)
 - Approved and updated meter reading protocols for documenting manual meter reads (September 2020, March 2023, and September 2025)
 - Conducted an initial WY 2020 meter read at 53 of 54 active wells operated by the Settling Parties (September 2020)
 - Collected and cataloged meter verification for all 54 active wells operated by the Settling Parties (September to October 2020)
 - Adopted additional meter reading protocols for the frequency of meter read data collection and QA/QC of telemetry meter reads (November 2020)
 - Collected and cataloged meter verification information for most non-Settling Party wells (May to October 2021)
 - Collected and reviewed monthly meter reads in WYs 2021 through WY 2025
 - Collected and cataloged annual meter accuracy tests in WY 2021 through WY 2025
 - Achieved 99 percent compliance with the meter reading program as of the end of WY 2025 (only one well remains unmetered)
 - Achieved 100 percent compliance in the annual meter verification process (WY 2025)
- Groundwater pumping reduction (Rampdown) milestones:
 - Groundwater pumping decreased by 29 percent since the start of the GMP implementation in WY 2021
 - In WY 2025, total pumping by the Parties was 10,129, af, which is approximately 45 percent less than the Annual Allocation of 18,270 af. The WY 2025 Annual Allocation represents a 25 percent Rampdown from the BPA. Thus, reductions in pumping are significantly ahead of the required Rampdown schedule
- Groundwater level and quality monitoring milestones:
 - Performed the first semi-annual monitoring event in December 2020 and performed seven semi-annual monitoring events since (through March 2025)
 - Approved the GWMP for the Borrego Springs Subbasin in April 2023 to comply with the requirement to develop a WQMP within 24 months of entry of the Judgment
 - Collaborated with DWR on the design and construction of two new monitoring wells (MW-6S and MW-6D) that were added to the monitoring network. The wells were constructed by DWR in Spring 2023 and funded through the TSS program. Transducers were installed in MW-6S and MW-6D in December 2024 and data were downloaded for the first time in Spring 2025
 - As part of implementation of the GWMP, Watermaster developed and implemented a public outreach effort to enhance the groundwater monitoring network and has added 21 wells to monitoring network since WY 2023. Of these wells, five wells were converted into monitoring wells in winter 2025 using SGM grant funding

- In WY 2025, the Watermaster performed well rehabilitation and/or securing activities at ten inactive wells in the existing monitoring program that needed to be properly secured due to public safety concerns. This work also extended the lifespan of the monitoring wells
- Developed outreach materials and FAQs that describe the necessary steps to properly abandon a well and posted materials to the Watermaster website as resources for private well owners
- Analysis of Sustainable Yield milestones:
 - The TAC recommended, and the Watermaster Board approved, the technical scope of work and budget for activities related to the determination of the 2025 Sustainable Yield (June 2021, updated January 2023)
 - Completed the extension of the BVHM through WY 2021 and identified improvements to be made to the model to support the recalculation of Sustainable Yield (August 2022)
 - Completed the extension of the BVHM through WY 2022 and identified improvements to be made to the model to support the recalculation of Sustainable Yield (May 2023)
 - Completed the approved scope of work to support the redetermination of the 2025 Sustainable Yield (September 2024)
 - Approved the 2025 Sustainable Yield as 7,952 afy ahead of the January 1, 2025 Judgment deadline (December 2024). This is the first five-year update since entry of the Judgment
 - The TAC recommended, and the Watermaster Board approved, the technical scope of work and budget for activities related to the determination of the 2030 Sustainable Yield (December 2024)
- Completed the analysis of Carryover rules ahead of the January 1, 2025 Judgment deadline and elected to (i) make no amendments to the Carryover rules defined in the Judgment and, (ii) revisit the Carryover analysis in 2030, following completion of the redetermination of the 2030 Sustainable Yield (December 2024)
- 5-Year GMP Assessment milestones:
 - Developed an annotated outline and framework of the 5-Year Assessment Report, inclusive of a high-level summary of the DWR requirements and a description of information to be included for each section (March 2025)
 - Began addressing DWR RCAs (June 2025)
- EWG milestones:
 - The EWG recommended, and the Watermaster Board approved, the scope of work and budget for WY 2022 for developing work plans related to biological restoration of fallowed agricultural land and monitoring of GDEs (May 2021)
 - The EWG recommended, and the Watermaster Board approved, the scope of work and budget for studying methods for biological restoration of fallowed agricultural land (February 2022)
 - Completed the Biological Restoration of Fallowed Lands project with DWR grant funding, including a comprehensive report documenting the methods, results, and conclusions from the Biological Restoration of Fallowed Lands project entitled *Recommended Retired Farmland Rehabilitation Strategies* (March 2025)

Water Year 2025 Annual Report for the Borrego Springs Subbasin

- Reporting milestones
 - Approved the 1st Annual Report of the Borrego Springs Groundwater Subbasin for WY 2019 for submittal to the DWR (March 2020)
 - Approved the Annual Report of the Borrego Springs Groundwater Subbasin for WY 2020 for submittal to the DWR (March 2021)
 - Approved the first expanded Annual Report of the Borrego Springs Groundwater Subbasin for WY 2021 for submittal to the Court pursuant to the Judgment and to DWR pursuant to SGMA (March 2022); and submitted three combined Annual Reports since (WYs 2022, 2023, and 2024)

Additional information about all the activities of the Watermaster can be found on its website at borregospringswatermaster.com.

7.0 REFERENCES

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- West Yost 2023. [Water Year 2022 Annual Report for the Borrego Springs Subbasin](#). Prepared for the Borrego Springs Watermaster. March 2023.
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- West Yost. 2022c. [Methods to Estimate Annual Storage Change in Borrego Springs Subbasin](#). February 2022.
- West Yost. 2021. [Water Year 2020 Annual Report for the Borrego Springs Subbasin](#). Prepared for the Borrego Springs Watermaster. April 2021.

Watermaster Board Motions - Water Year 2025

Appendix A. Borrego Springs Watermaster Water Year 2025 Board Actions

Meeting Date & Motion Number	Action	Motion Vote Count: approved-opposed-abstained
October 10, 2024		
Agenda Item I.D	Approve the Agenda	Motioned by Vice Chair Bilyk Seconded by Director Dax Motion carried unanimously (5-0-0)
Agenda Item II	Elect the following slate Board Officers in WY 2025: Chair Dave Duncan, Vice Chair Tyler Bilyk, Secretary Shannon Smith, and Treasurer Shannon Smith.	Motioned by Director Bennett Seconded by Director Dax Motion carried unanimously (5-0-0)
Agenda Item IV	Approve the Consent Calendar excluding Item IV.C <i>Transfers Receive and file Transfer of Water Rights: Carryover Transfer from W. Bauer to BSUSD</i> , and table this Item to a future Board meeting	Motioned by Director Dax Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)
Agenda Item VI.A	Approve the WY 2025 Board meeting dates, which will be scheduled for the third Wednesday of the month	Motioned by Director Bennett Seconded by Director Dax Motion carried unanimously (5-0-0)
Agenda Item VI.B	Approve the \$8,560 proposal by C.J. Brown & Company, CPAs to perform the WY 2024 financial audit	Motioned by Vice Chair Bilyk Seconded by Director Dax Motion carried by majority vote (5-5-0)
Agenda Item VI.C	Approve the TAC and EWG meeting agendas included in the Board package	Motioned by Vice Chair Bilyk Seconded by Director Dax Motion carried unanimously (5-0-0)
Agenda Item VI.F	i) negotiate a standard Entry Agreement with the BWD for the Viking Well and, ii) present a cost estimate during the November 2024 Board meeting.	Motioned by Seconded by Motion carried by majority vote (3-2-0). Chair Duncan and Director Dax voted no.
Agenda Item VII	Approve the agenda for the November 7, 2024 Board meeting agenda as presented on the monitor	Motioned by Vice Chair Bilyk Seconded by Director Bennett Motion carried unanimously (5-0-0)
November 7, 2024		
Agenda Item I.D	Approve the Agenda	Motioned by Vice Chair Bilyk Seconded by Director Smith Motion carried unanimously (5-0-0)
Agenda Item III	Approve the Consent Calendar	Motioned by Director Jorgensen Seconded by Director Bennett Motion carried unanimously (5-0-0)

Appendix A. Borrego Springs Watermaster Water Year 2025 Board Actions

Meeting Date & Motion Number	Action	Motion Vote Count: approved-opposed-abstained
Agenda Item V.A	Approve the WY 2024 Water Rights Accounting	Motioned by Director Bennett Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)
Agenda V.B	Directing Watermaster Staff to bring forward a revised WY 2025 budget inclusive of the ‘carry forward’ request with the contingency that the vendors must take on the financial risk the additional budget is not reimbursed by the SGM grant if the work is not completed on time	Motioned by Director Smith Seconded by Director Jorgensen Motion carried unanimously (5-0-0)
Agenda V.C	Watermaster Staff to continue to pursue an Entry Agreement for the Viking Well and to add this well to the groundwater level monitoring program, as prescribed in the Board-approved Groundwater Management Plan	Motioned by Director Smith Seconded by Director Jorgensen Motion carried by roll-call vote (4-0-1). Chair Duncan abstained.
Agenda V.D	Approve the TAC agenda	Motioned by Director Smith Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)
Agenda Item VII	Approve the agenda for the December 5, 2024 Board meeting agenda as presented on the monitor	Motioned by Director Smith Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)
December 5, 2024		
Agenda Item I.D	Approve the Agenda	Motioned by Director Jorgensen Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)
Agenda Item III	Approve the Consent Calendar	Motioned by Director Smith Seconded by Director Bennett Motion carried unanimously (5-0-0)
Agenda Item V.A	Approve a 2025 Sustainable Yield of 7,952 afy and, with the requirement to report the range in values from the uncertainty analysis and that another redetermination will occur in five years when communicating the new value	Motioned by Vice Chair Bilyk Seconded by Director Smith Motion carried by majority vote (4-1-0). Chair Duncan voted no.
Agenda Item V.B	Execute the Entry Agreement with BWD	Motioned by Director Jorgensen Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)
Agenda Item VII	Approve the December 19, 2024 Special Board meeting agenda presented	Motioned by Vice Chair Bilyk Seconded by Director Jorgensen Motion carried by majority (4-0-0). Director Smith was absent

Appendix A. Borrego Springs Watermaster Water Year 2025 Board Actions

Meeting Date & Motion Number	Action	Motion Vote Count: approved-opposed-abstained
December 19, 2024		
Agenda Item III	Approve the Consent Calendar, inclusive of the revisions to the December 5, 2024 meeting minutes and excluding the November 2024 Financial Report, which should be brought back in January 2025	Motioned by Vice Chair Bilyk Seconded by Director Bennett Motion carried by majority (4-0-0). Chair Duncan was absent
Agenda Item IV.A	Perform Additional/Optional Task 2 – GDE Study Results and Task 3 – Monitoring Program Data as the scope of work to support the redetermination of the 2030 Sustainable Yield	Motioned by Director Bennett Seconded by Director Jorgensen Motion carried by majority (4-0-0). Chair Duncan was absent
Agenda Item IV.B	Make no changes to the Carryover rules and revisit the analysis of Carryover in 2030	Motioned by Director Jorgensen Seconded by Vice Chair Bilyk Motion carried by majority (4-0-0). Chair Duncan was absent
Agenda Item V	Approve the January 15, 2025 Board meeting agenda presented	Motioned by Director Jorgensen Seconded by Director Smith Motion carried by majority (4-0-0). Chair Duncan was absent
January 15, 2025		
Agenda Item I.D	Approve the Agenda	Motioned by Director Smith Seconded by Director Jorgensen Motion carried unanimously (5-0-0)
Agenda Item III	Approve Consent Calendar	Motioned by Director Bennett Seconded by Director Jorgensen Motion carried unanimously (5-0-0)
Agenda Item V.	Approve an increase of \$30,000 to the Land IQ budget for the Biological Restoration of fallowed lands project, subject to the following conditions: (i) Land IQ must request to utilize the cost savings on Tasks 1, 2, 4, and 5 to cover overages on Task 3 and (ii) accept the condition that Watermaster will not make any further payments, nor will Land IQ accrue interest on past-due payments, until demonstration of successful completion of the project by March 31, 2025.	Motioned by Director Smith Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)
Agenda Item VI.B	Approve the amendment to the WY 2025 budget as reflected on slide 46 of Board presentation slides	Motioned by Director Smith Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)
Agenda Item VI.C	Approve the TAC and EWG meeting Agendas included in the Board package	Motioned by Director Jorgensen Seconded by Director Bennett Motion carried unanimously (5-0-0)
Agenda Item VIII	Approve the February 19, 2025 Board meeting agenda as presented on slide 62 of the Board presentation slides	Motioned by Director Jorgensen Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)

Appendix A. Borrego Springs Watermaster Water Year 2025 Board Actions

Meeting Date & Motion Number	Action	Motion Vote Count: approved-opposed-abstained
February 15, 2025		
Agenda Item I.D	Approve the Agenda	Motioned by Vice Chair Bilyk Seconded by Director Bennett Motion carried unanimously (5-0-0)
Agenda Item III	Approve Consent Calendar items A and B	Motioned by Director Bennett Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)
Agenda Item III	Receive and file the Watermaster Staff invoices for December 2024	Motioned by Vice Chair Bilyk Seconded by Director Smith Motion carried unanimously (5-0-0)
Agenda Item VII	Approve the March 19, 2025 Board meeting agenda as presented on slide 88 of the Board presentation slides	Motioned by Director Jorgensen Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)
March 19, 2025		
Agenda Item I.D	Approve the Agenda	Motioned by Director Jorgensen Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)
Agenda Item III	Approve Consent Calendar	Motioned by Director Smith Seconded by Director Bennett Motion carried unanimously (5-0-0)
Agenda Item IV.A	Approve the WY 2024 Financial Audit by C.J. Brown & Company, CPAs and include it with the Water Year 2024 Annual Report for the Borrego Springs Subbasin.	Motioned by Vice Chair Bilyk Seconded by Director Smith Motion carried unanimously (5-0-0)
Agenda Item IV.B	Approve the Water Year 2024 Annual Report for the Borrego Springs Subbasin and file it with the Court and DWR	Motioned by Vice Chair Bilyk Seconded by Director Jorgensen Motion carried unanimously (5-0-0)
Agenda Item IV.D	Approve the press release of the DWR's approval of the Borrego Springs Alternative Plan.	Motioned by Vice Chair Bilyk Seconded by Director Bennett Motion carried unanimously (5-0-0)
Agenda Item IV.E	Approve the TAC meeting agenda to include all items except for TAC discussion of the DWR comments on the GMP, which should be deferred to a later meetings.	Motioned by Director Smith Seconded by Vice Chair Bilyk Motion carried unanimously (5-0-0)

Appendix A. Borrego Springs Watermaster Water Year 2025 Board Actions

Meeting Date & Motion Number	Action	Motion Vote Count: approved-opposed-abstained
Agenda Item VI	Approve the April 16, 2025 Board meeting agenda as presented on slide 69 of the Board presentation slides	Motioned by Chair Duncan
		Seconded by Director Smith
		Motion carried unanimously (5-0-0)
April 16, 2025		
Agenda Item I.D	Approve the Agenda	Motioned by Vice Chair Bilyk
		Seconded by Director Jorgensen
		Motion carried unanimously (5-0-0)
Agenda Item III	Approve Consent Calendar, inclusive of the revisions to the April 16, 2025 meeting minutes	Motioned by Director Bennett
		Seconded by Vice Chair Bilyk
		Motion carried unanimously (5-0-0)
Agenda Item VII	Approve the May 21, 2025 Board meeting agenda as presented on slide 73 of the Board presentation slides	Motioned by Vice Chair Bilyk
		Seconded by Director Bennett
		Motion carried unanimously (5-0-0)
May 21, 2025		
Agenda Item I.D	Approve the Agenda	Motioned by Vice Chair Bilyk
		Seconded by Director Smith
		Motion carried unanimously (4-0-0). Director Jorgensen was absent.
Agenda Item III	Approve Consent Calendar	Motioned by Director Smith
		Seconded by Vice Chair Bilyk
		Motion carried unanimously (4-0-0). Director Jorgensen was absent.
Agenda Item IV.A	Approve renewal of the insurance policy	Motioned by Director Smith
		Seconded by Director Bennett
		Motion carried unanimously (5-0-0)
Agenda Item IV.D	Approve the EWG meeting agenda	Motioned by Director Jorgensen
		Seconded by Director Bennett
		Motion carried unanimously (5-0-0)
Agenda Item VI	Approve the June 18, 2025 Board meeting agenda as presented	Motioned by Director Jorgensen
		Seconded by Director Smith
		Motion carried unanimously (5-0-0)

Appendix A. Borrego Springs Watermaster Water Year 2025 Board Actions

Meeting Date & Motion Number	Action	Motion Vote Count: approved-opposed-abstained
June 18, 2025		
Agenda Item I.D	Approve the Agenda	Motioned by Director Jorgensen
		Seconded by Vice Chair Bilyk
		Motion carried unanimously (5-0-0)
Agenda Item III	Approve Consent Calendar	Motioned by Vice Chair Bilyk
		Seconded by Director Smith
		Motion carried unanimously (5-0-0)
Agenda Item IV.A	Perform Step #1 of Director Smith’s recommendation: Complete an additional model run with revised pumping locations and volumes per the information provided by BWD. This simulation should be run with the same pumping assumptions for all other pumpers	Motioned by Director Bennett
		Seconded by Vice Chair Bilyk
		Motion carried unanimously (5-0-0)
Agenda Item IV.B	Approve the scope of work and to amend the West Yost Statement of Work to perform additional services to advance the 5-Year Assessment and address DWR comments on the GMP	Motioned by Director Smith
		Seconded by Director Jorgensen
		Motion carried unanimously (5-0-0)
Agenda Item IV.C	Approve the WY 2026 budget and recommendations as presented by staff, except for the creation of a Budget Subcommittee	Motioned by Director Smith
		Seconded by Director Jorgensen
		Motion carried unanimously (5-0-0)
Agenda Item VI	Approve the July 16, 2025 Board meeting agenda as presented	Motioned by Director Jorgensen
		Seconded by Vice Chair Bilyk
		Motion carried unanimously (5-0-0)
July 15, 2025		
Agenda Item I.D	Approve the Agenda	Motioned by Director Jorgensen
		Seconded by Director Moran
		Motion carried unanimously (4-0-0). Director Bennett was absent.
Agenda Item III	Approve Consent Calendar Items B, C, and D	Motioned by Director Moran
		Seconded by Director Smith
		Motion carried unanimously (4-0-0). Director Bennett was absent.
Agenda Item III	Approve Consent Calendar Item A	Motioned by Director Moran
		Seconded by Director Smith
		Motion carried unanimously (3-0-1). Director Moran abstained because she was not present at the June 18, 2025 Board meeting. Director Bennett was absent.

Appendix A. Borrego Springs Watermaster Water Year 2025 Board Actions

Meeting Date & Motion Number	Action	Motion Vote Count: approved-opposed-absented
Agenda Item IV	Elect Vice Chair Bilyk as Chairperson and Director Bennett as Vice Chairperson of the Watermaster Board	Motioned by Director Smith Seconded by Director Jorgensen Motion carried unanimously (4-0-0). Director Bennett was absent.
Agenda Item VI	Elect Director Moran to the Budget Subcommittee	Motioned by Director Smith Seconded by Director Moran Motion carried unanimously (4-0-0). Director Bennett was absent.
Agenda Item VI	Elect Director Smith to the Budget Subcommittee.	Motioned by Director Moran Seconded by Director Jorgensen Motion carried unanimously (4-0-0). Director Bennett was absent.
Agenda Item VI.C	Approve i) the EWG meeting agenda as presented, and ii) the TAC meeting agenda as presented plus a new agenda item for the TAC to review and provide feedback on the draft scope of work and list of third parties to review the GDE study report	Motioned by Director Smith Seconded by Director Moran Motion carried unanimously (4-0-0). Director Bennett was absent.
Agenda Item VI.E	Elect Director Jorgensen to the DWR communications committee	Motioned by Director Smith Seconded by Vice Chair Bilyk Motion carried unanimously (4-0-0). Director Bennett was absent.
Agenda Item VII	Approve the August 20, 2025 agenda presented	Motioned by Vice Chair Bilyk Seconded by Director Jorgensen Motion carried unanimously (4-0-0). Director Bennett was absent.
August 20, 2025		
Agenda Item I.D	Approve the Agenda	Motioned by Director Moran Seconded by Director Smith Motion carried unanimously (5-0-0)
Agenda Item III	Approve Consent Calendar, inclusive of the revisions to the July 16, 2025 meeting minutes	Motioned by Director Jorgensen Seconded by Director Moran Motion carried unanimously (5-0-0)
Agenda Item IV.A	Approve Contract Amendment No. 13	Motioned by Director Smith Seconded by Director Jorgensen Motion carried unanimously (5-0-0)
Agenda Item IV.B	1. Add the Nature Conservancy to the list of potential peer reviewers 2. Proceed with the next steps recommended in the agenda package memo 3. Revise the scope to phase the work into two-phases: i) determine if the GDE Study is Best Available Science, and ii) address other technical or policy questions 4. Authorize staff to exceed the WY 2025 EWG budget by up to \$5,000 5. Postpone the August EWG meeting.	Motioned by Director Smith Seconded by Vice Chair Bennett Motion carried unanimously (4-1-0). Director Jorgensen voted no.

Appendix A. Borrego Springs Watermaster Water Year 2025 Board Actions

Meeting Date & Motion Number	Action	Motion Vote Count: approved-opposed-abstained
Agenda Item VI	Approve the September 17, 2025 agenda presented	Motioned by Director Jorgensen Seconded by Director Moran Motion carried unanimously (5-0-0)
September 15, 2025		
Agenda Item I.D	Approve the Agenda	Motioned by Director Jorgensen Seconded by Chair Bilyk Motion carried unanimously (5-0-0)
Agenda Item III	Approve Consent Calendars	Motioned by Director Smith Seconded by Vice Chair Bennett Motion carried unanimously (5-0-0)
Agenda Item IV.A	Approve the WY 2026 Board meeting dates on the condition that item to discuss “Contracting for Staff and Legal services for WY 2027 and beyond” be moved from July to March 2026	Motioned by Director Moran Seconded by Director Smith Motion carried unanimously (5-0-0)
Agenda Item IV.B	Approve Resolution 25-01	Motioned by Director Moran Seconded by Director Jorgensen Motion carried unanimously (5-0-0)
Agenda Item IV.D	Approve the TAC meeting agenda	Motioned by Director Jorgensen Seconded by Chair Bilyk Motion carried unanimously (5-0-0)
Agenda Item VI	Approve the October 15, 2025 agenda presented	Motioned by Seconded by Motion carried unanimously (5-0-0)

Appendix B

Amendments to the Judgment

Appendix B. Record of Amendments to the Judgment

Date Amendment Approved by the Watermaster Board	Description of Amendment ¹	Date Motion Approved by the Court
October 13, 2022	Extend the Annual Report filing deadline from February 1st to April 1st.	April 20, 2023
September 14, 2023	Allow the Community Representative on the Watermaster Board to appoint a member to the TAC on behalf of the public.	March 21, 2024

1) Does not include interventions to the Judgment, which are recorded in Exhibit 4 (see Appendix E of this Annual Report)

Appendix C

Water Year 2025 Financial Audit

Borrego Springs Watermaster

Management Report

September 30, 2025



C.J. Brown & Company CPAs
An Accountancy Corporation

Borrego Springs Watermaster

Management Report

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C.J. Brown & Company CPAs
An Accountancy Corporation

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Christopher J. Brown, CPA, CGMA
Jonathan Abadesco, CPA
Jeffrey Palmer
Michael Howell, CPA

CONFIDENTIAL

Board of Directors
Borrego Springs Watermaster
Borrego Springs, California

Dear Members of the Board:

In planning and performing our audit of the financial statements of the Borrego Springs Watermaster (Watermaster) as of and for the year ended September 30, 2025, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in Government Auditing Standards, issued by the Comptroller General of the United States, we considered the Watermaster’s internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the entity’s internal control. Accordingly, we do not express an opinion on the effectiveness of the Watermaster’s internal control over financial reporting.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control over financial reporting, such that there is a reasonable possibility that a material misstatement of the entity’s financial statements will not be prevented, or detected and corrected on a timely basis. A reasonable possibility exists when the likelihood of an event occurring is either reasonably possible or probable as defined as follows:

- *Reasonably possible.* The chance of the future event or events occurring is more than remote but less than likely.
- *Probable.* The future event or events are likely to occur.

Our consideration of internal control was for the limited purpose described in the first paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses. Given these limitations, during our audit we did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

This communication is intended solely for the information and use of management, the Board of Directors, and others within the Watermaster, and is not intended to be, and should not be, used by anyone other than these specified parties. This restriction is not intended to limit the distribution of this letter, which is a matter of public record.

We appreciate the courtesy and cooperation extended to us during our examination. We would be pleased to discuss the contents of this letter with you at your convenience. Please do not hesitate to contact us.

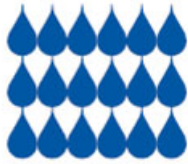
C.J. Brown & Company, CPAs
Cypress, California
March 18, 2026

APPENDIX

Borrego Springs Watermaster

Audit/Finance Committee Letter

September 30, 2025



C.J. Brown & Company CPAs

An Accountancy Corporation

Christopher J. Brown, CPA, CGMA
Jonathan Abadesco, CPA
Jeffrey Palmer
Michael Howell, CPA

Cypress Office:
10805 Holder Street, Suite 150
Cypress, California 90630
(657) 214-2307

Riverside Office:
5051 Canyon Crest Drive, Suite 203
Riverside, California 92507
(657) 214-2307

Board of Directors
Borrego Springs Watermaster
Borrego Springs, California

We have audited the financial statements of the Borrego Springs Watermaster (Watermaster) for the year ended September 30, 2025, and have issued our report thereon dated March 18, 2026.

Our Responsibility in Relation to the Financial Statement Audit

As communicated in our engagement letter dated November 20, 2025, our responsibility, as described by professional standards, is to form and express an opinion about whether the financial statements that have been prepared by management with your oversight are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America. Our audit of the financial statements does not relieve you or management of your respective responsibilities.

Our responsibility, as prescribed by professional standards, is to plan and perform our audit to obtain reasonable, rather than absolute, assurance about whether the financial statements are free of material misstatement. An audit of financial statements includes consideration of internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control over financial reporting. Accordingly, as part of our audit, we considered the internal control of the Watermaster solely for the purpose of determining our audit procedures and not to provide any assurance concerning such internal control.

We are also responsible for communicating significant matters related to the audit that are, in our professional judgment, relevant to your responsibilities in overseeing the financial reporting process. However, we are not required to design procedures for the purpose of identifying other matters to communicate to you.

If any, we have provided our findings regarding significant control deficiencies over financial reporting and material noncompliance, and other matters noted during our audit in a separate letter to you dated March 18, 2026.

Planned Scope and Timing of the Audit

We conducted our audit consistent with the planned scope and timing we previously communicated to you.

Compliance with All Ethics Requirements Regarding Independence

The engagement team, others in our firm, as appropriate, our firm, and our network firms have complied with all relevant ethical requirements regarding independence.

An auditor that is not involved in the engagement performed an independent review of the financial statements that was prepared by us based on the information provided by management. This safeguard reduces the threat of self-review risk to an acceptable level.

Required Risk Assessment Procedures per Auditing Standards

As auditors of the Watermaster, we are required per AU-C Section 240, “Consideration of Fraud in a Financial Statement Audit”, to “ordinarily” presume and consider the following risks in designing our audit procedures:

- Management override of controls
- Revenue recognition

Qualitative Aspects of the Entity’s Significant Accounting Practices

Significant Accounting Policies

Management has the responsibility to select and use appropriate accounting policies. A summary of the significant accounting policies adopted by the Watermaster is included in Note 1 to the financial statements. As of and for the year ended September 30, 2025, the Watermaster implemented the provisions of GASB Statement No. 102 – *Certain Risk Disclosures*. There have been no other initial selection of accounting policies and no other changes in significant accounting policies or their application during 2025. No other matters have come to our attention that would require us, under professional standards, to inform you about (1) the methods used to account for significant unusual transactions and (2) the effect of significant accounting policies in controversial or emerging areas for which there is a lack of authoritative guidance or consensus.

Significant Accounting Estimates

Accounting estimates are an integral part of the financial statements prepared by management and are based on management’s current judgments. Those judgments are normally based on knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ markedly from management’s current judgments. The most sensitive accounting estimates affecting the financial statements are as follows:

Management’s estimate of the fair value of cash and investments is based on information provided by financial institutions. We evaluated the key factors and assumptions used to develop the fair value of cash and investments in determining that it is reasonable in relation to the financial statements taken as a whole.

Financial Statement Disclosures

Certain financial statement disclosures involve significant judgment and are particularly sensitive because of their significance to financial statement users. The most sensitive disclosures affecting the Watermaster’s financial statements relate to:

The disclosure of fair value of cash and cash equivalents in Note 2 to the basic financial statements represents amounts susceptible to market fluctuations.

Significant Unusual Transactions

For purposes of this communication, professional standards require us to communicate to you significant unusual transactions identified during our audit. No significant unusual transactions were identified as a result of our audit procedures that were brought to the attention of management:

Identified or Suspected Fraud

We have not identified or have not obtained information that indicates that fraud may have occurred.

Significant Difficulties Encountered during the Audit

We encountered no significant difficulties in dealing with management relating to the performance of the audit.

Uncorrected and Corrected Misstatements

For purposes of this communication, professional standards also require us to accumulate all known and likely misstatements identified during the audit, other than those that we believe are trivial, and communicate them to the appropriate level of management. Further, professional standards require us to also communicate the effect of uncorrected misstatements related to prior periods on the relevant classes of transactions, account balances or disclosures, and the financial statements as a whole and each applicable opinion unit. There were no uncorrected misstatements whose effects in the current and prior periods, as determined by management, are immaterial, both individually and in the aggregate, to the financial statements taken as a whole.

Disagreements with Management

For purposes of this letter, professional standards define a disagreement with management as a matter, whether or not resolved to our satisfaction, concerning a financial accounting, reporting, or auditing matter, which could be significant to the Watermaster's financial statements or the auditor's report. No such disagreements arose during the course of the audit.

Circumstances that Affect the Form and Content of the Auditor's Report

For purposes of this letter, professional standards require that we communicate any circumstances that affect the form and content of our auditor's report. There were no circumstances that affect the form and content of the auditor's report.

Representations Requested from Management

We have requested certain written representations from management, which are included in the attached letter dated March 18, 2026.

Management's Consultations with Other Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters. Management informed us that, and to our knowledge, there were no consultations with other accountants regarding auditing and accounting matters.

Other Significant Matters, Findings, or Issues

In the normal course of our professional association with the Watermaster, we generally discuss a variety of matters, including the application of accounting principles and auditing standards, significant events or transactions that occurred during the year, operating and regulatory conditions affecting the entity, and operational plans and strategies that may affect the risks of material misstatement. None of the matters discussed resulted in a condition to our retention as the Watermaster's auditors.

Conclusion

We appreciate the cooperation extended to us by the West Yost Team: Samantha Adams, Executive Director, Leah Ehresman, Controller, and Maria Mendoza-Tellez, Project Accountant III, in the performance of our audit testwork.

We will be pleased to respond to any question you have about the foregoing. We appreciate the opportunity to continue to be of service to the Watermaster.

C.J. Brown & Company, CPAs

C.J. Brown & Company, CPAs

Cypress, California

March 18, 2026

Borrego Springs Watermaster
Annual Financial Report
For the Fiscal Years Ended September 30, 2025 and 2024



Borrego Springs, California

Our Mission Statement

"To manage groundwater resources of the Borrego Springs Subbasin in accordance with the April 8, 2021 judgment"

Board of Directors as of September 30, 2025

Name	Title	Elected/ Appointed	Current Term
Tyler Bilyk	Chair	Appointed	Ongoing
Jim Bennett	Vice-Chair	Appointed	Ongoing
Shannon Smith	Director	Appointed	Ongoing
Mark Jorgensen	Director	Appointed	Ongoing
Gina Moran	Director	Appointed	Ongoing

**Borrego Springs Watermaster
25 Edelman, Suite 120
Irvine, California 92618
www.borregospringswatermaster.com**

Borrego Springs Watermaster

Annual Financial Report

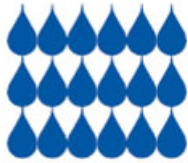
For the Fiscal Years Ended September 30, 2025 and 2024

**Borrego Springs Watermaster
Annual Financial Report
For the Fiscal Years Ended September 30, 2025 and 2024**

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Financial Section



C.J. Brown & Company CPAs

An Accountancy Corporation

Christopher J. Brown, CPA, CGMA
Jonathan Abadesco, CPA
Jeffrey Palmer
Michael Howell, CPA

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Independent Auditor's Report

Board of Directors
Borrego Springs Watermaster
Borrego Springs, California

Report on the Audit of the Financial Statements

We have audited the accompanying financial statements of the Borrego Springs Watermaster (Watermaster), which comprises the statement of net position as of September 30, 2025 and 2024, and the related statement of revenues, expenses, and changes in net position for the year then ended, and the related notes to the financial statements, which collectively comprise the Watermaster's basic financial statements as listed in the table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the Borrego Springs Watermaster as of September 30, 2025 and 2024, and the respective changes in net position, and, where applicable, cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinions

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, and the State Controller's Minimum Audit Requirements for California Special Districts. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Watermaster, and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Watermaster's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Independent Auditor's Report, continued

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards, we:

- exercise professional judgment and maintain professional skepticism throughout the audit.
- identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Watermaster's internal control. Accordingly, no such opinion is expressed.
- evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Watermaster's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis on pages 4 through 6, be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Independent Auditor's Report, continued

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated March 18, 2026, on our consideration of the Watermaster's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Watermaster's internal control over financial reporting and compliance. This report can be found on pages 19 and 20.

C.J. Brown & Company, CPAs

C.J. Brown & Company, CPAs
Cypress, California
March 18, 2026

Borrego Springs Watermaster
Management's Discussion and Analysis
For the Fiscal Years Ended September 30, 2025 and 2024

The following Management's Discussion and Analysis (MD&A) of activities and financial performance of the Borrego Springs Watermaster (Watermaster) provides an introduction to the financial statements of the Watermaster for the year ended September 30, 2025 (with summarized comparative information for fiscal year ended September 30, 2024). We encourage readers to consider the information presented here with additional information that we have furnished in the accompanying basic financial statements and related notes, which follow this section.

2025 Financial Highlights

- In 2025, the Watermaster's net position decreased 14.92% or \$166,002 to \$946,914.
- In 2025, the Watermaster's total revenues decreased 10.78% or \$151,749 to \$1,256,473.
- In 2025, the Watermaster's total expenses increased 5.29% or \$71,460 to \$1,422,475.

Using This Financial Report

This annual report consists of a series of financial statements. The Statements of Net Position, Statements of Revenues, Expenses, and Changes in Net Position, and Statements of Cash Flows provide information about the activities and performance of the Watermaster using accounting methods similar to those used by private sector companies.

The Statements of Net Position include all of the Watermaster's investments in resources (assets), and obligations to creditors (liabilities). They also provide the basis for evaluating the results of operations, evaluating the capital structure of the Watermaster, and assessing the liquidity and financial flexibility of the Watermaster. All of the current year's revenues and expenses are accounted for in the Statements of Revenues, Expenses, and Changes in Net Position. These statements measure the success of the Watermaster's operations over the past year and can be used to determine if the Watermaster has successfully recovered all of its costs through its rates and other charges. In addition to tracking cost recovery performance, these statements can also be used to evaluate the results of operations and creditworthiness. The final required financial statements are the Statements of Cash Flows, which provide information about the Watermaster's cash receipts and cash payments during the reporting period. The Statements of Cash Flows report cash receipts, cash payments, and net changes in cash resulting from operations, investing, non-capital financing, and capital and related financing activities, and provides answers to such questions as where did cash come from, what was cash used for, and what was the change in cash balance during the reporting period.

Financial Analysis of the Watermaster

One of the most important questions asked about the Watermaster's finances is, "Is the Watermaster better off or worse off as a result of this year's activities?" The Statements of Net Position and the Statements of Revenues, Expenses, and Changes in Net Position report information about the Watermaster in a way that helps answer this question. These statements include all assets, and liabilities, using the *accrual basis of accounting*, which is similar to the accounting method used by most private sector companies. All of the current year's revenues and expenses are taken into account regardless of when the cash is received or paid.

These two statements report the Watermaster's *net position* and changes in them. You can think of the Watermaster's net position – the difference between assets less liabilities – as one way to measure the Watermaster's financial health, or *financial position*. Over time, *increases or decreases* in the Watermaster's net position are one indicator of whether its *financial health* is improving or deteriorating. However, one will need to consider other non-financial factors such as changes in economic conditions, population growth, zoning, and new or changed government legislation, such as changes in Federal and State water quality standards.

Borrego Springs Watermaster
Management's Discussion and Analysis, continued
For the Fiscal Years Ended September 30, 2025 and 2024

Notes to the Basic Financial Statements

The notes to the basic financial statements provide additional information that is essential to a full understanding of the data provided in the basic financial statements. The notes to the basic financial statements can be found on pages 10 through 18.

Statements of Net Position

Condensed Statements of Net Position

	<u>2025</u>	<u>2024</u>	<u>Change</u>
Assets:			
Current assets	\$ <u>1,046,163</u>	<u>1,829,591</u>	<u>(783,428)</u>
Total assets	<u>1,046,163</u>	<u>1,829,591</u>	<u>(783,428)</u>
Liabilities:			
Current liabilities	<u>99,249</u>	<u>716,675</u>	<u>(617,426)</u>
Total liabilities	<u>99,249</u>	<u>716,675</u>	<u>(617,426)</u>
Net position:			
Unrestricted	<u>946,914</u>	<u>1,112,916</u>	<u>(166,002)</u>
Total net position	<u>\$ 946,914</u>	<u>1,112,916</u>	<u>(166,002)</u>

As noted earlier, net position may serve over time as a useful indicator of financial position. In the case of the Watermaster, assets exceeded liabilities by \$946,914, as of September 30, 2025.

At the end of fiscal year 2025, the Watermaster reflected a positive balance in its unrestricted net position of \$946,914, that may be utilized in future years. See note 3 for further discussion.

Statements of Revenues, Expenses, and Changes in Net Position

Condensed Statements of Revenues, Expenses, and Changes in Net Position

	<u>2025</u>	<u>2024</u>	<u>Change</u>
Revenues:			
Operating revenues	\$ <u>1,256,473</u>	<u>1,408,222</u>	<u>(151,749)</u>
Total revenues	<u>1,256,473</u>	<u>1,408,222</u>	<u>(151,749)</u>
Expenses:			
Operating expenses	1,364,658	1,285,873	78,785
Non-operating expense	<u>57,817</u>	<u>65,142</u>	<u>(7,325)</u>
Total expenses	<u>1,422,475</u>	<u>1,351,015</u>	<u>71,460</u>
Change in net position	(166,002)	57,207	(223,209)
Net position, beginning of year	<u>1,112,916</u>	<u>1,055,709</u>	<u>57,207</u>
Net position, end of year	<u>\$ 946,914</u>	<u>1,112,916</u>	<u>(166,002)</u>

Borrego Springs Watermaster
Management's Discussion and Analysis, continued
For the Fiscal Years Ended September 30, 2025 and 2024

Statements of Revenues, Expenses, and Changes in Net Position, continued

In 2025, net position decreased 14.92% or \$166,002 to \$946,914, as a result of ongoing operations.

In 2025, total revenues decreased 10.78% or \$151,749 to \$1,256,473, primarily due to decreases of \$109,791 in administrative assessments, and \$42,514 in grant revenues.

In 2025, total expenses increased 5.29% or \$71,460 to \$1,422,475, primarily due to increase of \$154,443 in consulting services, which was offset by decreases of \$44,070 in grant expenditures, and \$32,044 in legal fees.

Conditions Affecting Current Financial Position

Management is unaware of any other conditions which could have a significant impact on the Watermaster's current financial position, net position, or operating results based on past, present, and future events.

Requests for Information

This financial report is designed to provide the Watermaster's present users, including funding sources, customers, stakeholders, and other interested parties with a general overview of the Watermaster's finances and to demonstrate the Watermaster's accountability with an overview of the Watermaster's financial operations and financial condition. Should the reader have questions regarding the information included in this report or wish to request additional financial information, please contact the Watermaster's Executive Director, at West Yost, 25 Edelman, Suite 120, Irvine, California 92618.

Basic Financial Statements

Borrego Springs Watermaster
Statements of Net Position
September 30, 2025 and 2024

	<u>2025</u>	<u>2024</u>
Current assets:		
Cash and cash equivalents (note 2)	\$ 738,997	839,255
Accounts receivable	9,330	17,601
Grants receivable (note 3)	266,268	944,099
Prepaid expenses	<u>31,568</u>	<u>28,636</u>
Total current assets	<u>1,046,163</u>	<u>1,829,591</u>
Total assets	<u>1,046,163</u>	<u>1,829,591</u>
Current liabilities:		
Accounts payable and accrued expenses (note 3)	<u>99,249</u>	<u>716,675</u>
Total current liabilities	<u>99,249</u>	<u>716,675</u>
Total liabilities	<u>99,249</u>	<u>716,675</u>
Net position: (note 4)		
Unrestricted	<u>946,914</u>	<u>1,112,916</u>
Total net position	<u>\$ 946,914</u>	<u>1,112,916</u>

See accompanying notes to the basic financial statements

Borrego Springs Watermaster
Statements of Revenues, Expenses, and Changes in Net Position
For the Fiscal Years Ended September 30, 2025 and 2024

	2025	2024
Operating revenues:		
Administrative assessments	\$ 348,220	458,011
Grant revenues	901,228	943,742
Meter read revenues	7,025	6,469
Total operating revenues	1,256,473	1,408,222
Operating expenses:		
Grant expenditures	900,028	944,098
Meter read expenses	4,759	3,428
Consulting services	344,625	190,182
Legal fees	70,826	102,870
Reimbursements	-	4,261
Insurance	44,420	41,034
Total operating expenses	1,364,658	1,285,873
Operating (loss) income	(108,185)	122,349
Non-operating expenses:		
Other expenses	(57,817)	(65,142)
Total non-operating expenses	(57,817)	(65,142)
Change in net position	(166,002)	57,207
Net position, beginning of year	1,112,916	1,055,709
Net position, end of year	\$ 946,914	1,112,916

See accompanying notes to the basic financial statements

Borrego Springs Watermaster
Statements of Cash Flows
For the Fiscal Years Ended September 30, 2025 and 2024

	2025	2024
Cash flows from operating activities:		
Cash receipts from parties to the judgment	\$ 356,491	490,831
Cash receipts from grants	1,579,059	885,676
Cash payments for programs, vendors and suppliers	(1,977,991)	(1,361,724)
Net cash (used in) provided by operating activities	(42,441)	14,783
Cash flows from non-capital financing activities:		
Other non-operating expenses	(57,817)	(65,142)
Net cash used in non-capital financing activities	(57,817)	(65,142)
Net decreases in cash and cash equivalents	(100,258)	(50,359)
Cash and cash equivalents, beginning of year	839,255	889,614
Cash and cash equivalents, end of year	\$ 738,997	839,255
 Reconciliation of cash and cash equivalents to the statements of net position:		
Cash and cash equivalents	\$ 738,997	839,255
Total cash and cash equivalents	\$ 738,997	839,255
 Reconciliation of operating (loss) income to net cash (used in) provided by operating activities:		
Operating (loss) income	\$ (108,185)	122,349
Changes in assets and liabilities:		
(Increase) decrease in assets:		
Accounts receivable	8,271	32,820
Grants receivable	677,831	(58,066)
Prepaid expenses	(2,932)	(1,921)
Increase (decrease) in liabilities:		
Accounts payable and accrued expenses	(617,426)	(80,399)
Total adjustments	65,744	(107,566)
Net cash (used in) provided by operating activities	\$ (42,441)	14,783

See accompanying notes to the basic financial statements

Borrego Springs Watermaster
Notes to the Financial Statements
For the Fiscal Years Ended September 30, 2025 and 2024

(1) Reporting Entity and Summary of Significant Accounting Policies

A. Organization and Operations of the Reporting Entity

In January 2020, a complaint seeking a comprehensive adjudication of the groundwater rights of the Basin was filed by the Borrego Water District in the Superior Court for San Diego County, pursuant to Code of Civil Procedure (CCP) sections 830, et seq (Borrego Water District v. All Persons Who Claim a Right to Extract Groundwater in the Borrego Valley Groundwater Subbasin, et., San Diego Superior Court case no. 37-2020-0005776-CU-TT-CTL). The proposed Stipulated Judgment was filed with the Court pursuant to a Settlement Agreement that was signed by Settling Parties that are responsible for over 90 percent of the groundwater pumping in the Basin. The Settlement Agreement also provided for the establishment of an Interim Borrego Springs Watermaster to assume responsibility for the sustainable management of the Basin pursuant to the terms of the Judgment until finalized by the Court. The Interim Borrego Springs Watermaster held its first meeting on March 31, 2020.

On April 8, 2021, the honorable Judge Peter Wilson of the CA Superior Court for the County of Orange granted the motion for entry of the Stipulated Judgment (Judgment) which adjudicated the groundwater rights of the Borrego Spring Subbasin, As stated in Section II.F of the Judgment, the Court found that the Physical Solution for the Basin, which is comprised of the Judgment and Groundwater Management Plan for the Borrego Springs Subbasin, is consistent with California Water Code (CWC) Section 10737.8 and is prudent, legal durable means to achieve sustainable groundwater management within the Basin intended by Sustainable Groundwater Management Act.

The Basin has a surface area of approximately 98 square miles or 62,776 acres. The western and southwestern boundary of the Basin is defined by the contact of poorly to moderately consolidated sediments with the plutonic and metamorphic basement of Pinyon Ridge and the San Ysidro Mountains. The northern and eastern boundaries are defined by the mapped trace of the Coyote Creek fault that trends northwest-southeast. East of the Coyote Creek fault lies Coyote Mountain, the Borrego Badlands, and the Ocotillo-Clark Valley Groundwater Basin. The southeastern boundary of the Plan Area is defined by the location of San Felipe Creek, which also marks the northern boundary of the Ocotillo Wells Groundwater Subbasin.

To administer the Judgment, the Court directed appointment of the Watermaster (a five-member board). The court appointed Watermaster Board is made up of five members: The Watermaster normally conducts monthly general meetings of the Board which are held on the second Thursday of the month.

B. Basis of Accounting and Measurement Focus

The Watermaster reports its activities as an enterprise fund, which is used to account for operations that are financed and operated in a manner similar to a private business enterprise, where the intent of the Watermaster is that the cost of administering the Judgment on a continuing basis be financed or recovered primarily through various assessments. Revenues and expenses are recognized on the full accrual basis of accounting. Revenues are recognized in the accounting period in which they are earned, and expenses are recognized in the period incurred, regardless of when the related cash flows take place.

Operating revenues and expenses result from exchange transactions associated with the principal activity of the Watermaster. Exchange transactions are those in which each party receives and gives up essentially equal value. Management and administration expenses are also considered operating expenses. Other revenues and expenses not included in the above categories are reported as non-operating revenues and expenses.

Borrego Springs Watermaster
Notes to the Financial Statements, continued
For the Fiscal Years Ended September 30, 2025 and 2024

(1) Reporting Entity and Summary of Significant Accounting Policies, continued

C. Financial Reporting

The Watermaster's basic financial statements have been prepared in conformity with accounting principles generally accepted in the United States of America (GAAP), as applied to enterprise funds. The Governmental Accounting Standards Board (GASB) is the accepted standard-setting body for establishing governmental accounting and financial reporting principles. The Watermaster solely operates as a special-purpose government which means it is only engaged in business-type activities; accordingly, activities are reported in the Watermaster's proprietary fund.

The Watermaster has adopted the following GASB pronouncements in the current year:

In June 2022, the GASB issued Statement No. 101 – *Compensated Absences*. The objective of this Statement is to better meet the information needs of financial statement users by updating the recognition and measurement guidance for compensated absences. That objective is achieved by aligning the recognition and measurement guidance under a unified model and by amending certain previously required disclosures.

This Statement requires that liabilities for compensated absences be recognized for (1) leave that has not been used and (2) leave that has been used but not yet paid in cash or settled through noncash means. A liability should be recognized for leave that has not been used if (a) the leave is attributable to services already rendered, (b) the leave accumulates, and (c) the leave is more likely than not to be used for time off or otherwise paid in cash or settled through noncash means. Leave is attributable to services already rendered when an employee has performed the services required to earn the leave. Leave that accumulates is carried forward from the reporting period in which it is earned to a future reporting period during which it may be used for time off or otherwise paid or settled. In estimating the leave that is more likely than not to be used or otherwise paid or settled, a government should consider relevant factors such as employment policies related to compensated absences and historical information about the use or payment of compensated absences. However, leave that is more likely than not to be settled through conversion to defined benefit postemployment benefits should not be included in a liability for compensated absences. This Statement did not have a material impact to the financial statements.

In December 2023, the GASB issued Statement No. 102 – *Certain Risk Disclosures*. The primary objective of this Statement requires a government to assess whether a concentration or constraint makes the primary government reporting unit or other reporting units that report a liability for revenue debt vulnerable to the risk of a substantial impact. Additionally, this Statement requires a government to assess whether an event or events associated with a concentration or constraint that could cause the substantial impact to have occurred, have begun to occur, or are more likely than not to begin to occur within 12 months of the date the financial statements are issued. Please refer to Note 5 for a detailed discussion.

D. Assets, Liabilities, and Net Position

1. Use of Estimates

The preparation of the basic financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts and disclosures. Actual results could differ from those estimates.

2. Cash and Cash Equivalents

For the purposes of the statement of cash flows, cash equivalents are defined as short-term, highly liquid investments that are both readily convertible to known amounts of cash or so near their maturity that they present insignificant risk of changes in value because of changes in interest rates and have an original maturity date of three months or less.

Borrego Springs Watermaster
Notes to the Financial Statements, continued
For the Fiscal Years Ended September 30, 2025 and 2024

(1) Reporting Entity and Summary of Significant Accounting Policies, continued

D. Assets, Liabilities, and Net Position, continued

3. Accounts Receivable and Allowance for Uncollectible Accounts

The Watermaster makes assessments pursuant to the Judgment in the normal course of operations. Management has determined that all amounts are considered collectible. As a result, the Watermaster has not recorded an allowance for doubtful accounts as of September 30, 2025 and 2024, respectively.

4. Net Position

The financial statements utilize a net position presentation. Net position is categorized as follows:

- **Unrestricted** – Consists of the net amount of assets, and liabilities that are not included in the determination of the net *investment in capital assets* or *restricted* components of net position.

5. Administrative Assessments

Administrative assessments are levied on the parties to the judgment in an amount sufficient to fund the costs of administering the judgment. During the year ended September 30, 2025, the assessment was \$24.06 per acre foot.

6. Budgetary Policies

In accordance with the Judgment, the Watermaster shall prepare a watermaster budget for each year, hold hearings thereon, and adopt a final Watermaster Budget. The annual Watermaster budget will be determined by the Watermaster in an amount necessary to fulfill the duties of Watermaster as prescribed by the Judgment and a reasonable reserve, all of which will be subject to review and revision by the Court. Following the adoption of the Watermaster budget, expenditures within the budgeted items may thereafter be made by Watermaster in the exercise of powers herein granted, as a matter of course. The annual budget process to determine the budget for the each year will be as follows:

June 30th – Watermaster publishes the Watermaster budget for ensuing Water Year.

July 31st – Any challenge to the budget by a Party must be initiated by notice to the Watermaster.

August 30th – Mediation of any challenge to the budget is completed pursuant to Section VII.A(1) of Judgment.

October 15th – Any challenge to the budget by a party unresolved by mediation will be heard by the Court.

(2) Cash and Cash Equivalents

Cash and cash equivalents as of September 30 are classified in the accompanying financial statements as follows:

	2025	2024
Cash and cash equivalents	\$ 738,997	839,255
Total cash and cash equivalents	\$ 738,997	839,255

Cash and cash equivalents as of September 30 consist of the following:

	2025	2024
Deposits held with financial institutions	\$ 738,997	839,255
Total cash and cash equivalents	\$ 738,997	839,255

Borrego Springs Watermaster
Notes to the Financial Statements, continued
For the Fiscal Years Ended September 30, 2025 and 2024

(2) Cash and Cash Equivalents, continued

Custodial Credit Risk

Custodial credit risk for *deposits* is the risk that, in the event of the failure of a depository financial institution, a government will not be able to recover its deposits, or will not be able to recover collateral securities that are in the possession of an outside party. The California Government Code and the Watermaster's investment policy do not contain legal or policy requirements that would limit the exposure to custodial credit risk for deposits or investments, other than the following provision for deposits: The California Government Code requires that a financial institution secure deposits made by state or local governmental units by pledging securities in an undivided collateral pool held by a depository regulated under state law (unless so waived by the governmental unit). The market value of the pledged securities in the collateral pool must equal at least 110% of the total amount deposited by the public agencies. Of the bank balances, up to \$250,000 is federally insured and the remaining balance is collateralized in accordance with the Code; however, the collateralized securities are not held in the Watermaster's name.

(3) Grants Receivable

On December 13, 2022, the Borrego Water District (District) entered into a Proposition 68 grant agreement in the amount of \$6,115,833 with the Department of Water Resources. The Watermaster entered into a subgrantee agreement with the District in the amount of \$2,738,590. The grant agreement will assist in financing projects associated with the Sustainable Groundwater Management Grant Program on a reimbursable basis. Watermaster's scope of work consists of Component 6: Biological Restoration of Fallowed Lands (in the amount of \$755,340), and Component 7, Monitoring, Reporting and Groundwater Management Plan (in the amount of \$1,983,250).

As of September 30, 2025 and 2024, grants receivable amounted to \$266,268, and \$944,099, respectively.

On December 12, 2022 and January 23, 2023, the Watermaster entered into agreements with two of its consultants, West Yost and Land IQ, LLC respectively, that provide for extended payment terms for services performed by these firms, including the work contemplated by the subgrantee agreement. The extended payment terms provide for a maximum deferral of payments totaling \$550,000 and \$200,000 for West Yost and Land IQ, LLC, respectively until January 2026, along with customary provisions for repayment with a simple interest rate of the Wall Street Journal Prime Rate plus 2% divided by 12 at the time the interest charge is calculated.

The terms of the subgrantee agreement require work to be completed and reimbursed conditioned upon receipt by Borrego Water District (District) of grant funds from Department of Water Resources (DWR). The time between when the costs are incurred and when the Watermaster will receive reimbursement from the District is expected to exceed six months. Additionally, the Watermaster may expend amounts to execute the grant projects it believes are reimbursable under the subgrantee agreement for which reimbursement may not be received. As a result, the execution of the grant work could result in the need for additional assessment of the parties that may exceed annual assessment levels.

As of September 30, 2025, the Watermaster's accounts payable amounted to \$99,249. Of the total amount, the Watermaster's balance due to West Yost amounted to \$82,143, respectively.

As of September 30, 2024, the Watermaster's accounts payable amounted to \$716,675. Of the total amount, the Watermaster's balance due to West Yost and Land IQ, LLC amounted to \$538,380 and \$160,487, respectively.

Borrego Springs Watermaster
Notes to the Financial Statements, continued
For the Fiscal Years Ended September 30, 2025 and 2024

(4) Net Position

Calculation of net position was as follows:

	2025	2024
Unrestricted net position		
Non-spendable net position		
Prepaid expenses	\$ 31,568	28,636
Total non-spendable net position	31,568	28,636
Spendable net position		
Unrestricted	31,568	28,636
Total spendable net position	31,568	28,636
Total unrestricted net position	915,346	1,084,280
Total net position	\$ 946,914	1,112,916

(5) Certain Risk Disclosures

Watermaster assesses concentrations and constraints known prior to the issuance of the financial statements that may make it vulnerable to the risk of a substantial impact. A concentration is defined as a lack of diversity related to a significant inflow or outflow of resources. The following disclosures address concentrations meeting the criteria for disclosure under GASB 102, including descriptions of the concentration, associated events that could cause a substantial impact, and actions taken or planned to mitigate the risks. These risks are known to the Watermaster prior to the issuance of these financial statements, make the Watermaster vulnerable to substantial impacts, and involve events that have occurred or begun to occur, or are at least reasonably possible to occur within three years of issuance.

Credit concentration risk related to assessable parties

The Watermaster’s primary source of revenue is derived from assessments levied on pumpers within the Borrego Springs Groundwater Subbasin, pursuant to the Stipulated Judgment entered on April 8, 2021, and the associated Groundwater Management Plan (GMP). These assessments are based on Baseline Pumping Allocations (BPAs) and actual pumping volumes, with fees set annually to fund the Watermaster’s operations, monitoring, and sustainability efforts under the Sustainable Groundwater Management Act (SGMA). As of September 30, 2025, the assessable parties consist of a limited number of pumpers, primarily in the agricultural, recreational (e.g., golf courses), and municipal sectors.

This represents a concentration because the top 10 pumpers represent 89% of the pumping assessment. A lack of diversity in the payer base exposes the Watermaster to credit risk, as the failure of one or more major pumpers to pay assessments could result in a substantial shortfall in revenue, potentially impairing the Watermaster’s ability to fulfill its mandates, such as groundwater monitoring, reporting to the Department of Water Resources (DWR), and enforcement of pumping reductions to achieve the Subbasin’s sustainable yield of approximately 7,952 acre-feet per year by 2040.

Borrego Springs Watermaster
Notes to the Financial Statements, continued
For the Fiscal Years Ended September 30, 2025 and 2024

(5) Certain Risk Disclosures, continued

Associated Events and Potential Substantial Impacts

Prior to issuance of these financial statements, the Watermaster identified the following events and its potential substantial impacts:

- Events such as financial distress, bankruptcy, or cessation of operations by major pumpers have begun to occur in the Subbasin due to the required 75% reduction in pumping over the 20-year GMP implementation period (from historical overdraft levels). It is reasonably possible that within the next three years, additional pumpers may face similar challenges, exacerbated by ongoing drought conditions, rising operational costs, or market shifts that lead to decreases in financial results which increase the risk for bankruptcy or cessation of operations in the industries where pumpers operate.
- If pumpers fail to elect to purchase carryover allocations (i.e., unused BPAs from prior years or transferred from other parties), this could lead to a reduction in overall assessable pumping volumes, thereby increasing the unit cost of assessments revenue per acre foot. For example, in Water Year 2025, assessments were set at \$24.06 per acre-foot that included assessment against 12,908.99-acre feet of carryover election by pumpers. If the carryover election was not made by these pumpers, the assessment rate would have been \$213.45 per acre feet. A significant decline in carryover elections by pumpers will result in higher per acre foot assessments, which increase financial burdens on pumpers and increase the risks associated with financial distress and cessation of operations. A reduction in carryover election by pumpers does not result in a revenue shortfall, a reduction in carryover election, results in an increase to the per acre foot cost of pumping.

Actions Taken

Prior to issuance of these financial statements, the Watermaster executed the following mitigating actions:

- The Watermaster monitors pumper compliance through metering and annual reporting, with enforcement mechanisms under the Stipulated Judgment, including penalties for non-payment establishing a lien for non-payment and foreclosure of the lien pursuant to state law.
- Budget planning includes an unallocated contingency reserve equivalent to a reserve target of 9 months of the annual operating budget expenditures to buffer against revenue shortfalls.

These disclosures are based on information known as of the date of issuance and will be reassessed annually. No other concentrations or constraints met the criteria for disclosure under GASB 102.

(6) Risk Management

The Watermaster is exposed to various risks of loss related to torts, theft of, damage to, and destruction of assets; errors and omissions; and natural disasters. The Watermaster is insured for a variety of potential exposures. The following is a summary of the insurance policies carried by the Watermaster as of September 30, 2025.

The following is a summary of insurance policies carried by the Watermaster as of September 30, 2025:

- Commercial General Liability: \$3,000,000 General Aggregate Limit (Other than Products/Completed Operations); \$3,000,000 Products/Completed Operations Aggregate Limit (Any One Person or Organization); \$1,000,000 Personal and Advertising Injury Limit; \$1,000,000 Each Occurrence Limit; \$1,000,000 Rented To You Limit; \$10,000 Medical Expenses Limit (Any One Person); and \$1,000,000 Hired and Non-Owned Auto Liability Coverage.

Borrego Springs Watermaster
Notes to the Financial Statements, continued
For the Fiscal Years Ended September 30, 2025 and 2024

(6) Risk Management, continued

- Commercial Excess Liability: Limits of Liability are \$1,000,000 Retained Limit, \$1,000,000 Each Occurrence, \$1,000,000 General Aggregate Limit, \$1,000,000 Products/Completed Operations to Aggregate.
- Public Officials and Management Liability: \$3,000,000 Aggregate Limit of Liability Coverage; \$1,000,000 Each Wrongful or Offense Limit (if Occurrence); N/A Each Claim Limit (if Claims-Made).
- Settled claims have not exceeded any of the coverage amounts in any of the last three years and there were no reductions in the Watermaster's insurance coverage during the years ended September 30, 2025, 2024 and 2023. Liabilities are recorded when it is probable that a loss has been incurred and the amount of the loss can be reasonably estimated net of the respective insurance coverage. Liabilities include an amount for claims that have been incurred but not reported (IBNR). There was no IBNR claims payable as of September 30, 2025, 2024 and 2023.

(7) Governmental Accounting Standards Board Statements Issued, Not Yet Effective

The Governmental Accounting Standards Board (GASB) has issued several pronouncements prior to September 30, 2025, that has effective dates that may impact future financial presentations.

Governmental Accounting Standards Board Statement No. 103

In April 2024, the GASB issued Statement No. 103 – *Financial Reporting Model Improvements*. The primary objective of this Statement is to improve key components of the financial reporting model to enhance effectiveness in providing information that is essential for decision making and assessing a government's accountability. Also, this Statement: (1) continues the requirement that the basic financial statements be preceded by management's discussion and analysis (MD&A), which is presented as required supplementary information (RSI); (2) describes unusual or infrequent items as transactions and other events that are either unusual in nature or infrequent in occurrence; (3) requires that the proprietary fund statement of revenues, expenses, and changes in fund net position continue to distinguish between operating and nonoperating revenues and expenses; (4) requires governments to present each major component unit separately in the reporting entity's statement of net position and statement of activities if it does not reduce the readability of the statements; and (5) requires governments to present budgetary comparison information using a single method of communication—RSI.

The requirements of this Statement are effective for fiscal years beginning after June 15, 2025, and all reporting periods thereafter. Earlier application is encouraged.

Governmental Accounting Standards Board Statement No. 104

In September 2024, the GASB issued Statement No. 104 – *Disclosure of Certain Capital Assets*. The primary objective of this Statement is to provide users of government financial statements with essential information about certain types of capital assets. This Statement establishes requirements for certain types of capital assets to be disclosed separately in the capital assets note disclosures required by Statement No. 34, *Basic Financial Statements and Management Discussion and Analysis for State and Local Governments*. Also, this Statement establishes requirements for capital assets held for sale, including additional disclosures for those capital assets. The requirements of this Statement apply to the financial statements of all state and local governments.

The requirements of this Statement are effective for fiscal years beginning after June 15, 2025, and all reporting periods thereafter. Earlier application is encouraged.

Borrego Springs Watermaster
Notes to the Financial Statements, continued
For the Fiscal Years Ended September 30, 2025 and 2024

(7) Governmental Accounting Standards Board Statements Issued, Not Yet Effective, continued

Governmental Accounting Standards Board Statement No. 105

In December 2025, the GASB issued Statement No. 105 – *Subsequent Events*. The primary objective of this Statement is to improve the financial reporting requirements for subsequent events, thereby enhancing consistency in their application and better meeting the information needs of financial statement users. This Statement defines subsequent events as transactions or other events that occur after the date of the financial statements but before the date the financial statements are available to be issued. This Statement describes the date the financial statements are available to be issued as the date at which (1) the financial statements are complete in a form and format that complies with generally accepted accounting principles and (2) approvals necessary for issuance have been obtained.

That definition modifies the subsequent events time frame throughout the GASB literature. This Statement also requires the date through which subsequent events have been evaluated to be disclosed. This Statement clarifies the subsequent events that constitute recognized and nonrecognized events and establishes specific note disclosure requirements for nonrecognized events.

The requirements of this Statement are effective for fiscal years beginning after June 15, 2026, and all reporting periods thereafter. Earlier application is encouraged.

(8) Commitments and Contingencies

Grant Awards

Grant funds received by the Watermaster are subject to audit by the grantor agencies. Such audit could lead to requests for reimbursements to the grantor agencies for expenditures disallowed under terms of the grant. Management of the Watermaster believes that such disallowances, if any, would not be significant.

Litigation

In the ordinary course of operations, the Watermaster is subject to claims and litigation from outside parties. After consultation with legal counsel, the Watermaster believes the ultimate outcome of such matters, if any, will not materially affect its financial condition.

Contracts

The Watermaster has a variety of agreements with outside parties. As of September 30, 2025, the Watermaster’s open balance on contract commitments is \$8,791 shown as follows:

<u>Vendor</u>	<u>Project Name</u>	<u>Total Approved Contract</u>	<u>Billed to Date</u>	<u>Remaining balance</u>
West Yost	Admin and Technical Services	\$ 339,833	336,528	3,305
	Component 7 - Monitoring,			
West Yost	Reporting, and GMP Update	662,233	660,481	1,752
	Component 6 - Biological			
West Yost	Restoration of Fallowed Lands	20,812	17,219	3,593
	Biological Restoration of Fallowed			
Land IQ	Lands	<u>736,480</u>	<u>736,339</u>	<u>141</u>
	Total	\$ <u>1,759,358</u>	<u>1,750,567</u>	<u>8,791</u>

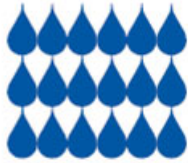
Borrego Springs Watermaster
Notes to the Financial Statements, continued
For the Fiscal Years Ended September 30, 2025 and 2024

(9) Subsequent Events

Events occurring after September 30, 2025, have been evaluated for possible adjustment to the financial statements or disclosure as of March 18, 2026, which is the date the financial statements were available to be issued. The Watermaster is not aware of any further subsequent events that would require recognition or disclosure in the financial statements.

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Report on Internal Controls and Compliance



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**Independent Auditor's Report on Internal Controls Over Financial Reporting
and on Compliance and Other Matters Based on an Audit of Financial Statements
Performed in Accordance with *Government Auditing Standards***

Board of Directors
Borrego Springs Watermaster
Borrego Springs, California

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the Borrego Springs Watermaster (Watermaster) as of and for the year ended September 30, 2025, and the related notes to the financial statements, which collectively comprises the Watermaster's basic financial statements, and have issued our report thereon dated March 18, 2026.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Watermaster's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Watermaster's internal control. Accordingly, we do not express an opinion on the effectiveness of the Watermaster's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Watermaster's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

**Independent Auditor's Report on Internal Controls Over Financial Reporting
And on Compliance and Other Matters Based on an Audit of Financial Statements
Performed in Accordance with *Government Auditing Standards*, (continued)**

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Watermaster's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Watermaster's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

C.J. Brown & Company, CPAs

C.J. Brown & Company, CPAs
Cypress, California
March 18, 2026

Appendix D

Water Year 2026 Budget as Approved June 18, 2025

**Borrego Springs Watermaster
Board of Directors Meeting
June 18, 2025
AGENDA ITEM IV.C**

To: Board of Directors
From: Samantha Adams, Executive Director
Date: June 13, 2025
Subject: Consideration of Approval of the Water Year 2026 Budget

<input checked="" type="checkbox"/> Recommended Action	<input type="checkbox"/> Provide Direction to Staff	<input type="checkbox"/> Information and Discussion
<input checked="" type="checkbox"/> Fiscal Impact	<input checked="" type="checkbox"/> Cost Estimate: \$741,153	

Recommendation

Approve the recommended Water Year (WY) 2026 Budget (with modifications, as needed) **OR** recommend changes to be brought back for consideration of approval at a Special Board meeting on or before June 30, 2025.

Approval of the WY 2026 Budget as recommended herein includes approval of the following:

- A WY 2026 Pumping Assessment of \$350,0000
- An Overproduction Penalty Assessment of \$500 per acre-foot
- Total operating expenditure for WY 2026 in the amount of \$741,153
- Appointment of a Subcommittee of 2 Board members to work with the Executive Director (ED) to identify strategies to reduce operating costs and projected pumping assessments for WY 2027 and beyond

Fiscal Impact:

- The enclosed WY 2026 budget for WY 2026 presents the revenues, expenditures, vendor term liabilities, and cash reserves for WY 2026, and a projection period of WY 2027 through 2030. The budget is shown in its entirety in the enclosed Exhibit 1. **The Projection for WY 2027 through WY 2030 is for informational and planning purposes only** and should not be interpreted as a commitment to perform work at the level of the projected expenditures, or to require the projected pumping assessments, beyond 2026.
- The WY 2026 budget includes **expenditures of \$741,153**. The WY 2026 **revenues of \$361,020** will be funded by pumping assessments and payment on pass-through expenses. This reduced level of assessment is possible due to receipt of the remaining Department of Water Resources (DWR) Sustainable Groundwater Management (SGM) grant reimbursements accrued in prior years.

Item IV.C

- During WY 2026, vendor financing will be fully paid off as the remaining DWR grant reimbursements are paid out and cash reserves will be maintained at or near the standard reserve policy of nine months of operating expenses.
- The WY 2026 draft budget expenditure assumes the Board approves staff's recommendation to advance completion of the 5-Year Assessment of the Groundwater Management Plan (GMP), by beginning to address the DWR Recommended Corrective Actions (RCAs) utilizing available time and budget in the remainder of WY 2025 – as presented in Agenda Item IV.B. If this recommendation is not approved, the budget presented herein would have to change.
- To address Board concerns about future costs and assessments (WY 2027 and beyond), a Board Subcommittee should begin working with the ED to review all budget line items and present options for cost savings to the Board throughout WY 2026, so these concepts are finalized for the first draft of the WY 2027 Budget. For now, the projected costs shown are similar to those presented in May 2025 as the ED is not able to present cost savings until specific direction is provided.

Background and Judgment Requirements

Section IV.E.3 of the Judgment provides for a process and schedule for developing the Watermaster's annual budget and establishing assessments to fund it by July 1st of each year. **The Judgment requires a supermajority vote (4 of 5 Board members) to establish (or change) a budget.**

The purpose of this memo is to present the recommended WY 2026 Budget for approval to meet this deadline. As with past budget packages, the budget includes a projection for four additional years into the future (WY 2027 through WY 2030). The projection is prepared based on Staff's best professional judgment about the scope and cost of future work. The projection for WY 2027 through WY 2030 is built using the Watermaster's Financial Planning Model¹ and is for informational and planning purposes only and should not be interpreted as a commitment to perform work at the level of the projected expenditures, or to require the projected pumping assessments, beyond 2026.

To facilitate the review of the Recommended Budget, this memo is organized into the following sections:

- Overview of the Recommended Draft WY 2026 Budget
- Summary of changes made to the Draft WY 2026 Budget presented in May 2025
- Recommended approach to addressing future costs and revenue requirements
- Recommendation
- Next steps

¹ See Draft WY 2026 Budget memo from the May 21, 2025 Board meeting. See Agenda Item IV.B, page 163 of 214 in this agenda package: [20250521 Board-Agenda-Package.pdf](#)

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Overview of the Recommended Draft WY 2026 Budget

Exhibit 1 summarizes the proposed line-item operating budget, including revenues, expenditures, deferred payment liabilities, and reserves for WY 2026 and the projected budgets in these categories for WYs 2027 through 2030. The table also shows the approved WY 2025 Budget (as amended in January 2025) and the projected actual WY 2025 year-end balances for each category. This overview is focused on summarizing WY 2026, and can be further adjusted based on Board feedback. Staff believes that all of the items included in the WY 2026 Budget are necessary to stay on track with Judgment requirements and address DWR comments on the GMP. Later in this memo, considerations will be presented to address Board concerns with future costs and revenue requirements for WY 2027 and beyond.

Revenues. Total WY 2026 revenue is **\$361,020**. Revenues will be derived from three sources:

- **Pumping Assessments: \$350,000**
 - The WY 2026 Pumping Assessment is the same level that was projected in the WY 2025 budget and is able to remain low due to expected reimbursements payments from DWR from grant expenditures incurred in WY 2025.
- **Bad Debt: -\$1,000.** Up to \$1,000 in pumping assessments is assumed written off as bad debt. To date, Watermaster has not written off any bad debt.
- **Overproduction Penalty Assessments: \$0.** This is revenue received from Pumpers who exceed their pumping limits defined in the Judgment. The amount of Overproduction that will incur penalty assessments in WY 2026, if any, will not be known until the start of WY 2026 when the Water Rights Accounting for WY 2025 is completed. Per Board direction, the Overproduction Penalty Assessment Rate should be set at \$500 per acre-foot (the minimum allowed by the Judgment). The budget assumes that all Overproduction that could trigger penalty assessments will be cured by Pumpers to avoid the penalty and thus no revenues will be collected in WY 2026.
- **Revenues for Pass-thru Expenses: \$12,020.** In WY 2026 pass thru revenues will include collection of fees from Parties with manual-read meters for Watermaster services related to reading the meters. The revenue will increase over time as the cost of this service increases with inflation.

Expenditures. This section of Exhibit 1 shows the expenditures by category and line-item. Total expenditures are **\$741,153**, which is 50% less than WY 2025. The high-level scope of work categories to support administration of the Judgment and SGMA compliance in WY 2026 include the following:

- Annual Routine Administrative and Technical Services:
 - Administrative Services (Board meetings, TAC meetings, Court hearings, Stakeholder Outreach, financial services, support to BPA parties, maintain website, respond to public inquiries, as-needed administration of the Judgment requirements, and budget management)

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- Professional and Other Vendor Services (audit, insurance, equipment, miscellaneous expenses, interest expense on payment terms)
- Legal Services
- General Technical Services (meter reading program, groundwater monitoring program, data management and reporting, Annual Report to the Court and DWR, as-needed technical services to support Judgment compliance)
- Environmental Working Group (support of EWG meetings and technical recommendations at the agreed funding level of \$20,000 per year)
- Non-Routine Technical Consultant Services:
 - 5-Year GMP Assessment and Update (including addressing DWR RCAs)
 - Technical Work to Support Sustainable Yield Updates

The scope of work detail and budget estimates for the routine annual services, and associated line-item assumptions applied in developing the WY 2026 budget and projections for WY 2027 through 2030, are detailed in Attachment A of this staff memo. The recommended scope of work and budget for the non-routine technical consultant services for WY 2026 through 2030 is detailed in Attachment B, and assumes that the Board has approved Staff's recommendation to start advancing the 5-Year Assessment Report in WY 2025 (Agenda Item IV.B of the June Agenda Package).

Table 1 shows the recommended monthly schedule to complete the non-routine technical services, assuming the Board approved to commence the work in prior Agenda Item IV.B.

Liabilities on Payment Terms. This section of Exhibit 1 summarizes the estimated balance of payments owed to West Yost and Land IQ under the proposed vendor payment terms. It shows the beginning outstanding balance, minimum and maximum monthly balance, and year-end outstanding balance. **The total liability on Payment Terms with West Yost and Land IQ is projected to be \$149,988 at the beginning of WY 2026 and \$0 at the end of WY 2026.** All liabilities are projected by the financial model to be fully paid off by January 2026.

Cash Reserves. This section of Exhibit 1 summarizes the projected reserve balances and targets based on the monthly financial model. The reserve targets represent the average reserve needed during the year to maintain a balance that would be needed to support the next nine months of spending, per the Watermaster's reserve policy. The table shows the beginning cash reserves, the average reserve target, the minimum month-end reserve balance during the year, the average month-end reserve balance, and the variance of the average month-end reserve balance from the desired average reserve balance. **For WY 2026 the average reserve target is \$555,865 and the average reserve is \$587,706, an average of \$31,841 above the target.**

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Exhibit 1. Recommended WY 2026 Budget and Four-Year Projection of Borrego Springs Watermaster Operating Budget (WY 2027 through 2030)
Assuming Vendor Payment Terms, 8-Month Delay in DWR Grant Request Reimbursements through 2026, and 9-month Operating Reserve through 2030

Revenues, Expenditures, and Reserves	Amended WY 2025	Projected Actual WY 2025 ⁶	Draft Proposed WY 2026	Projected Budget ¹			
				WY 2027	WY 2028	WY 2029	WY 2030
Revenues²	\$ 1,263,380	\$ 1,248,592	\$ 361,020	\$ 801,621	\$ 802,000	\$ 802,390	\$ 802,791
Pumping Assessments	\$ 350,000	\$ 338,511	\$ 350,000	\$ 790,000	\$ 790,000	\$ 790,000	\$ 790,000
Bad Debt (assumed non-payment on Assessments)	\$ (2,500)	\$ (100)	\$ (1,000)	\$ (1,000)	\$ (1,000)	\$ (1,000)	\$ (1,000)
Overproduction Penalty Assessments	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Revenues Collected for Pass thru Expenses	\$ 7,316	\$ 10,008	\$ 12,020	\$ 12,621	\$ 13,000	\$ 13,390	\$ 13,791
DWR Prop 68 Grant Reimbursements ³	\$ 908,564	\$ 900,173	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenditures	\$ 1,475,643	\$ 1,454,258	\$ 741,153	\$ 791,553	\$ 850,192	\$ 866,918	\$ 854,847
Administrative Services	\$ 421,598	\$ 418,362	\$ 301,671	\$ 299,815	\$ 312,378	\$ 325,663	\$ 339,526
Watermaster Staff Admin Services	\$ 290,796	\$ 287,624	\$ 237,255	\$ 238,202	\$ 248,214	\$ 258,655	\$ 269,544
Board Meetings	\$ 106,600	\$ 106,600	\$ 104,753	\$ 99,991	\$ 104,491	\$ 109,193	\$ 114,106
Technical Advisory Committee Meetings	\$ 52,444	\$ 52,444	\$ 32,950	\$ 33,939	\$ 34,957	\$ 36,005	\$ 37,086
Court Hearings	\$ 3,510	\$ 1,429	\$ 1,512	\$ 1,588	\$ 1,659	\$ 1,734	\$ 1,812
Stakeholder Outreach/Workshops	\$ 12,543	\$ 11,976	\$ 12,846	\$ 13,231	\$ 13,628	\$ 14,037	\$ 14,458
Administration and Management	\$ 78,699	\$ 78,588	\$ 85,194	\$ 89,454	\$ 93,479	\$ 97,686	\$ 102,082
Prop 68 Project Admin and Grant Reporting	\$ 37,000	\$ 36,587	\$ -	\$ -	\$ -	\$ -	\$ -
Other Administrative or Vendor Services	\$ 130,802	\$ 130,733	\$ 64,417	\$ 61,613	\$ 64,164	\$ 67,008	\$ 69,982
Financial Audit	\$ 8,560	\$ 8,098	\$ 8,812	\$ 9,064	\$ 9,340	\$ 9,807	\$ 10,297
Insurance	\$ 45,401	\$ 44,420	\$ 48,142	\$ 50,549	\$ 52,824	\$ 55,201	\$ 57,685
Misc. Expenses	\$ 2,500	\$ 133	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000
Meter Accuracy Testing Vendors	\$ 13,500	\$ 14,430	\$ -	\$ -	\$ -	\$ -	\$ -
Interest on Vendor Terms During Prop 68 Grant Period ³	\$ 60,841	\$ 63,651	\$ 5,463	\$ -	\$ -	\$ -	\$ -
Pass Through Expenses	\$ -	\$ 5	\$ -	\$ -	\$ -	\$ -	\$ -
Reimbursement to Settling Parties	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Reimbursement to BWD for GSP	\$ -	\$ 5	\$ -	\$ -	\$ -	\$ -	\$ -
Legal Services	\$ 105,000	\$ 98,000	\$ 110,000	\$ 105,000	\$ 108,150	\$ 111,395	\$ 114,736

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Exhibit 1. Recommended WY 2026 Budget and Four-Year Projection of Borrego Springs Watermaster Operating Budget (WY 2027 through 2030)
Assuming Vendor Payment Terms, 8-Month Delay in DWR Grant Request Reimbursements through 2026, and 9-month Operating Reserve through 2030

Revenues, Expenditures, and Reserves	Amended WY 2025	Projected Actual WY 2025 ⁶	Draft Proposed WY 2026	Projected Budget ¹			
				WY 2027	WY 2028	WY 2029	WY 2030
Technical/Engineering Services	\$ 701,942	\$ 705,322	\$ 297,462	\$ 354,116	\$ 396,665	\$ 396,472	\$ 366,793
<i>Routine Annual Technical Consultant Services</i>	\$ 242,251	\$ 212,466	\$ 224,870	\$ 231,616	\$ 238,565	\$ 245,722	\$ 253,093
<i>Coordinate/Implement meter reading program</i>	\$ 30,440	\$ 30,081	\$ 33,584	\$ 34,592	\$ 35,629	\$ 36,698	\$ 37,799
<i>Groundwater Monitoring Program</i>	\$ 124,060	\$ 98,387	\$ 116,969	\$ 120,478	\$ 124,092	\$ 127,815	\$ 131,650
<i>Data Management and Data Reporting</i>	\$ 20,265	\$ 19,354	\$ 12,276	\$ 12,644	\$ 13,024	\$ 13,414	\$ 13,817
<i>Annual Report to the Court and DWR</i>	\$ 51,188	\$ 51,553	\$ 51,221	\$ 52,758	\$ 54,340	\$ 55,971	\$ 57,650
<i>As-needed technical support</i>	\$ 16,298	\$ 13,091	\$ 10,820	\$ 11,145	\$ 11,479	\$ 11,823	\$ 12,178
<i>Technical Consultant Services - Non-Routine</i>	\$ 459,691	\$ 492,856	\$ 72,592	\$ 122,500	\$ 158,100	\$ 150,750	\$ 113,700
<i>Address Inactive Wells via Abandonment/Conversion</i>	\$ 203,273	\$ 221,269	\$ -	\$ -	\$ -	\$ -	\$ -
<i>5-Year Assessment and Update of the GMP (includes addressing DWR RCAs)</i>	\$ 140,508	\$ 171,292	\$ 56,850	\$ -	\$ -	\$ -	\$ 75,900
<i>Develop Scope and Budget for future SY Updates</i>	\$ 15,272	\$ 15,444	\$ -	\$ -	\$ -	\$ -	\$ 17,800
<i>Technical Work to Support 2035 SY Update</i>	\$ 90,590	\$ 84,851	\$ 15,742	\$ 102,500	\$ 138,100	\$ 130,750	\$ -
<i>Undefined GMP Implementation Actions</i>	\$ 10,048	\$ -	\$ -	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000
Environmental Working Group	\$ 240,182	\$ 225,499	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000
<i>Biological Restoration of Fallowed Lands</i>	\$ 233,801	\$ 219,118	\$ -	\$ -	\$ -	\$ -	\$ -
<i>Ad Hoc Requests and EWG Meetings</i>	\$ 6,381	\$ 6,381	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000
Services to Parties with Manual Read Meters	\$ 6,921	\$ 7,076	\$ 12,020	\$ 12,621	\$ 13,000	\$ 13,390	\$ 13,791

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Exhibit 1. Recommended WY 2026 Budget and Four-Year Projection of Borrego Springs Watermaster Operating Budget (WY 2027 through 2030)
Assuming Vendor Payment Terms, 8-Month Delay in DWR Grant Request Reimbursements through 2026, and 9-month Operating Reserve through 2030

Revenues, Expenditures, and Reserves	Amended WY 2025	Projected Actual WY 2025 ⁶	Draft Proposed WY 2026	Projected Budget ¹			
				WY 2027	WY 2028	WY 2029	WY 2030
Liabilities on Payment Terms⁴							
Beginning Balance	\$ 587,501	\$ 587,501	\$ 149,988	\$ -	\$ -	\$ -	\$ -
<i>Minimum Monthly Balance</i>	\$ 278,432		\$ -	\$ -	\$ -	\$ -	\$ -
<i>Maximum Monthly Balance</i>	\$ 738,125		\$ 231,058	\$ -	\$ -	\$ -	\$ -
Year-End Balance	\$ 278,432	\$ 149,988	\$ -	\$ -	\$ -	\$ -	\$ -
Cash Reserves⁵							
Beginning Cash Reserves	\$ 839,254	\$ 839,254	\$ 560,559	\$ 536,361	\$ 551,213	\$ 505,625	\$ 465,593
Year-End Cash Reserve Balance	\$ 567,595	\$ 560,559	\$ 536,361	\$ 551,213	\$ 505,625	\$ 465,593	\$ 507,091
<i>Average Reserve to Maintain Target Operating Expenses of 9 months after Vendor Terms Paid off</i>	\$ 699,979		\$ 555,865	\$ 593,664	\$ 637,644	\$ 650,189	\$ 641,135
<i>Minimum Month-End Reserve Balance</i>	\$ 561,309		\$ 479,588	\$ 445,053	\$ 383,464	\$ 396,488	\$ 396,488
<i>Average Month-End Reserve Balance</i>	\$ 660,448		\$ 587,706	\$ 557,777	\$ 528,557	\$ 507,091	\$ 468,805
<i>Variance from Desired Reserve</i>	\$ (39,531)		\$ 31,841	\$ (35,887)	\$ (109,087)	\$ (143,098)	\$ (172,330)

Notes

- 1-- The projected budget is estimated based on Staff's best professional judgement as to how the cost of each line item will change over time. Some tasks increase at an assumed inflation rate of 4.5%; some tasks decrease in cost with efficiencies, followed by annual inflation increases; and some tasks fluctuate year to year based on the level of effort for non-routine work such as Sustainable Yield updates.
 - 2 -- Revenues are the amounts invoiced by Watermaster to pumpers, or in the case of the DWR grant, they are the accrued spending amounts that are eligible for reimbursement, during the Water Year. In the case of the DWR Reimbursements, payment on the reimbursement requests are actually delayed by 8 months from request date. This delay in payment is taken into consideration in the financial model to determine when to defer or pay on vendor invoices to maintain the target cash reserves.
 - 3 -- Combined interest to West Yost and Land IQ under proposed Payment Terms. Assumes prime interest rate of 9.5%.
 - 4-- Reflects balances owed to West Yost and Land IQ under Payment Terms.
 - 5 -- Projections are developed with the monthly financial model prepared by Watermaster Staff and are based on expected timing of receipt of payment on Watermaster assessments and DWR reimbursement, and timing of payments to vendors.
 - 6 -- The projection assumes that the Board approves staff's recommendation to advance completion of the 5-Year Assessment of the GMP, by beginning to address the Department of Water Resources (DWR) Recommended Corrective Actions (RCAs) utilizing available time and budget in the remainder of WY 2025.
- *Items listed in green bold text reflect a reduced cost since publishing the Draft WY 2026 budget. Items listed in red bold text reflect an increased cost. Items with blue highlight represent line items identified for investigating future cost savings with a Budget Subcommittee .

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Table 1. Recommended Schedule of Routine and Non-Routine Activities for June 2025 through June 2026

Month/Year	Routine Board Topics for Review and Potential Action at Board Meetings	Non-Routine Technical Topics for Discussion at Board, TAC, EWG, or Open House Workshops
June 2025	*WY 2026 Budget *Semi-Annual Monitoring Report (Spring '25)	Board: Workshop - Discuss Considerations for Updating the GMP
July 2025	*Q3 Budget Status	Board: Workshop - Judgment vs GMP TAC: *Revised BVHM Pumping Projection - Shift Pumping to NMA *Updating Groundwater Level and Storage SMC
Aug 2025	*Contract for Admin and Tech Services	EWG: *Bio Restore Study: EWG recommendations to Board *Recommend: Kick off GDE Study Review Board: Workshop - SMCs
Sept 2025		TAC: Addressing Groundwater Quality SMC, Land Subsidence Board: *Workshop - Groundwater Quality and SGMA *EWG recommendations on Bio Restore Study
Oct 2025	*WY 2025 Budget Summary *Draft Water Rights Accounting	Public Workshop: Updating SMC Board: Workshop - Overview of Public Comments in SMC Workshop
Nov 2025	*Final Water Rights Accounting	TAC: Review of Updated SMC (based on comments) Board: Workshop - RCA-2: Domestic Well Mitigation
Dec 2025		TAC/EWG: UCI Briefing on GDE Study Board: Workshop - SMC (final recommendations)
Jan 2026	*Q1 Budget Status <i>(note: workshop will include Fall '25 semi-annual monitoring results)</i>	TAC: Discuss GDE Study and Recommendation on BAS EWG: Discuss GDE Study and Recommendation on BAS Board: Workshop - Current Basin Conditions Relative to Updated SMC
Feb 2026	*Hearing: Draft WY 2025 Annual Report	Board: *Workshop - Conclusions and Recommendations of the 5-Yr Assessment *TAC, EWG, TC Recommendation on GDE Study
Mar 2026	*Final WY 2025 Annual Report	**Publish Compiled Draft 5-Year Assessment Report Public Workshop: Present Draft 5-Yr Assessment and GMP Update Board: Present Draft 5-Yr Assessment and GMP Update
Apr 2026	*Q2 Budget Status *WY 2027 Budget Scoping	TAC: 5-Yr Assessment Report/GMP Update, WY 2027 Budget Board: Addressing Public/TAC Comments on 5-Yr Assessment Report/GMP Update
May 2026	*Draft WY 2027 Budget *Mid-Year Pumping Reports	TAC: WY 2027 Budget Board: Revised Draft 5-Yr Assessment Report/GMP Redline
June 2026	*Final WY 2027 Budget *Semi-Annual Monitoring Report (Spring '26)	Board: Consider Approval of 5-Yr Assessment Report/GMP Update

Notes:

- BAS = Best Available Science
- BVHM = Borrego Valley Hydrologic Model
- GDE = Groundwater Dependent Ecosystem
- GMP = Groundwater Management Plan
- NMA = North Management Area of the Borrego Springs Subbasin
- PMA = Projects and Management Actions
- RCA = Recommended Corrective Action
- TC = Technical Consultant
- UCI = University of California - Irvine

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Summary of Changes Made to the Draft WY 2026 Budget Presented in May 2025

The following changes were made to the WY 2026 Budget since presenting the draft at the May 21, 2025 Board meeting. Line items with cost reductions are shown in **bold green** in Exhibit 1. Line items with cost increases are shown in **bold red** in Exhibit 1.

- The following line items were reduced in WY 2026 and beyond to better reflect labor effort in past years:
 - Court Hearings
 - Stakeholder Outreach/Workshops
 - Administration and Management
- The miscellaneous expense line item was reduced from \$2,500 to \$2,000. We don't recommend going below \$2,000 in the event water level monitoring probes need to be replaced.
- Legal Services was increased based on Board feedback at the May 2025 meeting that more budget might be needed to support addressing DWR RCAs.
- The Services to Parties with Manual Read Meters was increased to \$12,020 (up from \$7,304). This is a pass-through expense, paid only by those parties without telemetry on their wells. Thus, the matching revenue line item has also increased to \$12,020. This cost of this service was increased because the BWD General Manager reported that the BWD Board is likely to end its agreement to provide manual meter reading services effective in WY 2026. For now, the revised cost assumes West Yost will provide the services in WY 2026, but to control costs, the frequency of manual meter reads should be reduced to twice per year. Currently BWD reads the meters four times per year, with Pumpers self-reporting in the remaining eight months of the year. If West Yost were to perform the meter reads four times per year, the cost would increase to \$20,142. Alternatives to West Yost services, which can meet the insurance requirements of the Entry Agreements, should be investigated to reduce costs.
 - The proposed cost of \$12,020 will result in an increase in the per meter cost of manual meter reading from about \$146 to \$240 per well.
 - If the preferred approach is to remain at 4 Watermaster reads per year, the per meter cost would increase to \$419 per well.
- Technical Work to Support the 2035 Sustainable Yield Update was increased in WY 2028 and WY 2029 based on follow-up discussions with Director Jim Bennett, who expressed concern that the future costs for this work were under-budgeted. Specifically the costs did not provide the flexibility to include a task for upgrading the Borrego Valley Hydrologic Model (BVHM) to the latest software version, the use of which would represent use of the best available science and tools. And, additional contingency should be assumed during model calibration to reflect typical challenges that can arise. The costs were increased as follows:
 - WY 2028: Increased cost from \$44,110 to \$138,100
 - WY 2029: Increased cost from \$124,400 to \$130,750

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Recommended Approach to Addressing Future Costs and Revenue Requirements

At the May Board meeting, there was lengthy discussion about the need to reduce future costs and revenue requirements to support those costs. Several potential concepts were discussed to achieve cost savings with a goal to return to the level of routine services provided prior to the period of SGM grant funding. Table 2 summarizes the history of Watermaster's line-item revenues and expenditures for WY 2021 through WY 2025, and the projection for WY 2026 through WY 2030. The intent of this table is to show how costs have changed over time on a line-item basis and support future discussion of actions to achieve cost savings. Table 2 summarizes the total routine and non-routine costs at the bottom of the table.

To change the operating scope of work to achieve cost savings, it will be necessary to have Board input and approval, and in some cases, TAC input. Thus, Staff recommends the Board appoint a Budget Subcommittee to work with the ED to identify changes in scope and vet them with the TAC (if needed) and Board. This Subcommittee could begin work in WY 2025 to begin to affect change in WY 2026. Initial items that have been identified for investigation of cost savings are highlighted in blue in Exhibit 1 and include:

- Board meetings
- Insurance
- Legal services
- Meter reading program
- Groundwater monitoring program
- Data management services
- Annual reporting

Other items may be identified by the Subcommittee so this list should not be considered the only options for finding cost savings. For example, the Subcommittee could also explore alternatives to the current reserve policy requiring Cash Reserves equal to about nine months of operating expenses.

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Table 2. Comparison of Historical Actual Budget and Budget Projection

Revenues, Expenditures, and Reserves	Actual Startup and WY 2021	Actual WY 2022	Actual WY 2023	Actual WY 2024	Projected Actual WY 2025	Draft Proposed WY 2026	Projected Budget ¹			
							WY 2027	WY 2028	WY 2029	WY 2030
Revenues²	\$ 1,278,428	\$ 567,663	\$ 1,541,949	\$ 1,408,322	\$ 1,248,592	\$ 361,020	\$ 801,621	\$ 802,000	\$ 802,390	\$ 802,791
Pumping Assessments	\$ 1,159,489	\$ 457,939	\$ 649,021	\$ 458,011	\$ 338,511	\$ 350,000	\$ 790,000	\$ 790,000	\$ 790,000	\$ 790,000
Bad Debt (assumed non-payment on Assessments)	\$ -	\$ -	\$ -	\$ -	\$ (100)	\$ (1,000)	\$ (1,000)	\$ (1,000)	\$ (1,000)	\$ (1,000)
Overproduction Penalty Assessments	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Revenues Collected for Pass thru Expenses	\$ 118,939	\$ 109,724	\$ 6,895	\$ 6,569	\$ 10,008	\$ 12,020	\$ 12,621	\$ 13,000	\$ 13,390	\$ 13,791
Accrued DWR Prop 68 Grant Reimbursement	\$ -	\$ -	\$ 886,033	\$ 943,742	\$ 900,173	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenditures	\$ 540,360	\$ 831,057	\$ 981,677	\$ 1,351,015	\$ 1,454,258	\$ 741,153	\$ 791,553	\$ 850,192	\$ 866,918	\$ 854,847
Administrative Services	\$ 263,070	\$ 321,144	\$ 306,502	\$ 399,824	\$ 418,362	\$ 301,671	\$ 299,815	\$ 312,378	\$ 325,663	\$ 339,526
<i>Watermaster Staff Admin Services</i>	<i>\$ 185,570</i>	<i>\$ 155,709</i>	<i>\$ 220,480</i>	<i>\$ 269,348</i>	<i>\$ 287,624</i>	<i>\$ 237,255</i>	<i>\$ 238,202</i>	<i>\$ 248,214</i>	<i>\$ 258,655</i>	<i>\$ 269,544</i>
Board Meetings	\$ 100,296	\$ 69,240	\$ 88,542	\$ 99,167	\$ 106,600	\$ 104,753	\$ 99,991	\$ 104,491	\$ 109,193	\$ 114,106
<i>Technical Advisory Committee Meetings</i>	<i>\$ 26,318</i>	<i>\$ 29,458</i>	<i>\$ 27,511</i>	<i>\$ 45,625</i>	<i>\$ 52,444</i>	<i>\$ 32,950</i>	<i>\$ 33,939</i>	<i>\$ 34,957</i>	<i>\$ 36,005</i>	<i>\$ 37,086</i>
Court Hearings	\$ -	\$ 1,868	\$ 1,198	\$ 379	\$ 1,429	\$ 1,512	\$ 1,588	\$ 1,659	\$ 1,734	\$ 1,812
<i>Stakeholder Outreach/Workshops</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ 12,169</i>	<i>\$ 15,313</i>	<i>\$ 11,976</i>	<i>\$ 12,846</i>	<i>\$ 13,231</i>	<i>\$ 13,628</i>	<i>\$ 14,037</i>	<i>\$ 14,458</i>
<i>Administration and Management</i>	<i>\$ 58,956</i>	<i>\$ 55,143</i>	<i>\$ 58,473</i>	<i>\$ 67,046</i>	<i>\$ 78,588</i>	<i>\$ 85,194</i>	<i>\$ 89,454</i>	<i>\$ 93,479</i>	<i>\$ 97,686</i>	<i>\$ 102,082</i>
<i>Grant Administration and Reporting</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ 32,587</i>	<i>\$ 41,818</i>	<i>\$ 36,587</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ -</i>
<i>Other Administrative or Vendor Services</i>	<i>\$ 605</i>	<i>\$ 37,759</i>	<i>\$ 83,048</i>	<i>\$ 126,215</i>	<i>\$ 130,733</i>	<i>\$ 64,417</i>	<i>\$ 61,613</i>	<i>\$ 64,164</i>	<i>\$ 67,008</i>	<i>\$ 69,982</i>
Financial Audit	\$ -	\$ 8,000	\$ 8,425	\$ 7,840	\$ 8,098	\$ 8,812	\$ 9,064	\$ 9,340	\$ 9,807	\$ 10,297
Insurance	\$ -	\$ 29,759	\$ 33,197	\$ 41,034	\$ 44,420	\$ 48,142	\$ 50,549	\$ 52,824	\$ 55,201	\$ 57,685
Misc. Expenses	\$ 605	\$ -	\$ -	\$ 77	\$ 133	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000
Meter Accuracy Testing Vendors	\$ -	\$ -	\$ 12,600	\$ 12,200	\$ 14,430	\$ -	\$ -	\$ -	\$ -	\$ -
Interest on Vendor Terms During Prop 68 Grant Period	\$ -	\$ -	\$ 28,826	\$ 65,065	\$ 63,651	\$ 5,463	\$ -	\$ -	\$ -	\$ -
<i>Pass Through Expenses</i>	<i>\$ 76,895</i>	<i>\$ 127,676</i>	<i>\$ 2,974</i>	<i>\$ 4,261</i>	<i>\$ 5</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ -</i>	<i>\$ -</i>
Reimbursement to Settling Parties	\$ -	\$ 10,101	\$ 716	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Reimbursement to BWD for GSP	\$ 76,895	\$ 117,575	\$ 2,259	\$ 4,261	\$ 5	\$ -	\$ -	\$ -	\$ -	\$ -
Legal Services	\$ 78,742	\$ 124,140	\$ 78,829	\$ 102,870	\$ 98,000	\$ 110,000	\$ 105,000	\$ 108,150	\$ 111,395	\$ 114,736

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Table 2. Comparison of Historical Actual Budget and Budget Projection

Revenues, Expenditures, and Reserves	Actual Startup and WY 2021	Actual WY 2022	Actual WY 2023	Actual WY 2024	Projected Actual WY 2025	Draft Proposed WY 2026	Projected Budget ¹			
							WY 2027	WY 2028	WY 2029	WY 2030
Technical/Engineering Services	\$ 177,785	\$ 354,231	\$ 331,047	\$ 543,352	\$ 705,322	\$ 297,462	\$ 354,116	\$ 396,665	\$ 396,472	\$ 366,793
<i>Routine Annual Technical Consultant Services</i>	\$ 168,734	\$ 150,696	\$ 193,144	\$ 216,094	\$ 212,466	\$ 224,870	\$ 231,616	\$ 238,565	\$ 245,722	\$ 253,093
<i>Coordinate/Implement meter reading program</i>	\$ 47,854	\$ 20,942	\$ 28,753	\$ 30,147	\$ 30,081	\$ 33,584	\$ 34,592	\$ 35,629	\$ 36,698	\$ 37,799
<i>Groundwater Monitoring Program</i>	\$ 55,801	\$ 57,615	\$ 90,524	\$ 110,682	\$ 98,387	\$ 116,969	\$ 120,478	\$ 124,092	\$ 127,815	\$ 131,650
<i>Data Management and Data Reporting</i>	\$ 22,890	\$ 9,606	\$ 11,933	\$ 18,215	\$ 19,354	\$ 12,276	\$ 12,644	\$ 13,024	\$ 13,414	\$ 13,817
<i>Annual Report to the Court and DWR</i>	\$ 25,656	\$ 48,608	\$ 53,028	\$ 52,279	\$ 51,553	\$ 51,221	\$ 52,758	\$ 54,340	\$ 55,971	\$ 57,650
<i>As-needed technical support</i>	\$ 16,533	\$ 13,926	\$ 8,907	\$ 4,771	\$ 13,091	\$ 10,820	\$ 11,145	\$ 11,479	\$ 11,823	\$ 12,178
Technical Consultant Services - Non-Routine	\$ 9,051	\$ 203,534	\$ 137,903	\$ 327,258	\$ 492,856	\$ 72,592	\$ 122,500	\$ 158,100	\$ 150,750	\$ 113,700
<i>Develop Groundwater Monitoring Plan</i>	\$ -	\$ 23,564	\$ 49,013	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<i>Address Inactive Wells via Abandonment/Conversion</i>	\$ -	\$ -	\$ 2,885	\$ 32,863	\$ 221,269	\$ -	\$ -	\$ -	\$ -	\$ -
<i>Technical Work to Support 2035 SY Update</i>	\$ 9,051	\$ 114,222	\$ 75,234	\$ 250,822	\$ 84,851	\$ 15,742	\$ 102,500	\$ 138,100	\$ 130,750	\$ -
<i>Develop Scope and Budget for future SY Updates</i>	\$ -	\$ -	\$ -	\$ -	\$ 15,444	\$ -	\$ -	\$ -	\$ -	\$ 17,800
<i>5-Year Assessment and Update of the GMP</i>	\$ -	\$ -	\$ -	\$ 41,174	\$ 171,292	\$ 56,850	\$ -	\$ -	\$ -	\$ 75,900
<i>(includes addressing DWR RCAs)</i>										
<i>Ad-Hoc TAC/Undefined GMP Impl. Actions</i>	\$ -	\$ 8,823	\$ 10,771	\$ 2,400	\$ -	\$ -	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000
<i>Grant Applications</i>	\$ -	\$ 56,926	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Environmental Working Group	\$ 14,110	\$ 23,438	\$ 257,748	\$ 298,791	\$ 225,499	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000
<i>Biological Restoration of Fallowed Lands</i>	\$ -	\$ -	\$ 257,748	\$ 298,791	\$ 219,118	\$ -	\$ -	\$ -	\$ -	\$ -
<i>EWG Meetings and Ad-Hoc Requests</i>	\$ 14,110	\$ 23,438	\$ -	\$ -	\$ 6,381	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000
Services to Parties with Manual Read Meters	\$ 6,654	\$ 8,104	\$ 7,551	\$ 6,178	\$ 7,076	\$ 12,020	\$ 12,621	\$ 13,000	\$ 13,390	\$ 13,791
Total of Routine Services	\$ 454,414	\$ 499,846	\$ 509,039	\$ 601,622	\$ 627,611	\$ 663,099	\$ 669,053	\$ 692,092	\$ 716,168	\$ 741,147
<i>% Increase from Prior Year</i>		10%	2%	18%	4%	6%	1%	3%	3%	3%
Administrative Services (excl. grant admin/interest)	\$ 186,174	\$ 193,468	\$ 229,515	\$ 276,480	\$ 303,689	\$ 296,209	\$ 299,815	\$ 312,378	\$ 325,663	\$ 339,526
Routine Legal Services	\$ 78,742	\$ 124,140	\$ 78,829	\$ 102,870	\$ 98,000	\$ 110,000	\$ 105,000	\$ 108,150	\$ 111,395	\$ 114,736
Routine Technical Services	\$ 189,498	\$ 182,239	\$ 200,695	\$ 222,272	\$ 225,923	\$ 256,890	\$ 264,237	\$ 271,564	\$ 279,111	\$ 286,884
Total of Technical Non-Routine Services	\$ 9,051	\$ 203,534	\$ 395,651	\$ 626,049	\$ 711,974	\$ 72,592	\$ 122,500	\$ 158,100	\$ 150,750	\$ 113,700
<i>% Increase from Prior Year</i>		2149%	94%	58%	14%	-90%	69%	29%	-5%	-25%

Notes:

*Routine services (administrative, legal, and technical) are shown in blue bold text.

*Totals for Routine and Non-Routine Services exclude the pass-through expenses of reimbursements to BWD and Settling Parties that, and exclude non-routine grant related administrative costs such as interest on vendor terms and grant administration. These are one-off costs and not expected to be repeated in the future

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Recommendation

Staff recommends approval of the WY 2026 Budget as presented herein. Approval includes:

- A WY 2026 Pumping Assessment of \$350,0000
- An Overproduction Penalty Assessment of \$500 per acre-foot
- Total operating expenditure for WY 2026 in the amount of \$741,153
- Appointment of a Budget Subcommittee of 2 Board members to work with the ED to identify strategies to reduce operating costs and projected pumping assessments for WY 2027 and beyond

This recommendation, or any alternative to it motioned by the Board, requires a Supermajority vote to be approved.

Next Steps

If a Supermajority vote for the WY 2026 budget is not achieved, Staff will request direction from the Board for changes to the Budget and a special meeting will need to be scheduled on or before June 30, 2025 to adopt a budget.

Once a budget package is approved, Staff will:

- Publish the WY 2026 budget no later than July 1, 2025
- Report to the Board if any challenges to the Budget are noticed to Watermaster by July 31, 2025
- Prepare a “Statement of Work” based on the proposed scope of services and budget to be provided by West Yost during WY 2026. The Statement of Work will be presented to the Board for consideration of approval as an amendment to the existing West Yost Professional Services Agreement (expected August 2025).

Enclosures

Attachment A – Detailed Description of Routine Annual Administrative and Technical Services Expenditures

Attachment B - Recommended Scope and Budget for Non-Routine Technical Consultant Services through WY 2030

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Attachment A – Detailed Description of Routine Annual Administrative and Technical Services Expenditures

The following are the routine annual line items for Watermaster’s Administrative and Technical Consultant Services. The scope of work is similar from year to year, and in all cases, the cost of services (as shown in Exhibit 1) is assumed to increase with inflation over WY 2027 through WY 2030, unless otherwise noted. For each item, any key assumptions are noted with the brief scope description.

- **Administrative Services: \$301,671 for WY 2026.**
 - The services/costs in this category include:
 - **Watermaster Staff administrative services provided by West Yost (\$237,255 for WY 2026)**
 - Board meetings (Assumes 11 meetings per year – 2 in-person, 9 virtual)
 - TAC meetings (Assumes 5 virtual meetings)
 - Court hearings (Assumes support for 2 court hearings)
 - Stakeholder outreach meetings (Assumes 2 in-person events, timed with in-person Board meetings)
 - Administration and Management (budget development, financial services, management of records, website, support to BPA parties, as-needed support for implementation of the Judgment, project/budget management).
 - **Other administrative expenses (\$64,417 for WY 2026)**
 - Financial audit (\$8,812 for WY 2026)
 - Liability insurance (\$48,142 for WY 2026)
 - Miscellaneous expenses (\$2,000 for WY 2026)
 - Interest expenses on Payment Terms with West Yost and Land IQ - (\$5,463 for WY 2026; expense ends in WY 2026)
- **Legal Services: \$110,000 for WY 2026.** This task is for all as-needed legal services from RWG Law, which includes, at a minimum, attending and support of all Watermaster Board meetings and Court hearings. In WY 2026 additional cost is assumed to support addressing DWR comments on the Judgment and GMP. Costs are then reduced in WY 2027.
- **Routine Technical and Engineering Services: \$224,870 for WY 2026.** The routine technical and engineering services include:
 - Coordinate and implement monthly meter reading and annual verification program (\$33,584 for WY 2026, not including costs incurred by Parties with manual-read meters or for annual meter testing)

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- Implement the Groundwater Monitoring Plan. This involves semi-annual monitoring of groundwater level and quality and associated summary reporting and assumes that the size of the program will not expand by more than 1-2 additional existing wells compared to the spring 2025 monitoring event. (*\$116,969 for WY 2026*)
- Data management and reporting to the DWR Monitoring Network Module (*\$12,276 for WY 2026*)
- WY 2025 Water Rights Accounting Report and Annual Report to the Court/DWR (*\$51,221 for WY 2026*)
- As-needed technical services (*\$10,820 for WY 2026*)
- **Environmental Working Group: \$20,000 in WY 2026.** For WY 2026 and beyond, it is assumed that the level of work will remain at the agreed upon funding level of \$20,000 per year absent grant funding.
 - For WY 2026, Watermaster Staff recommend utilizing funding to facilitate the EWG in developing a recommendation on whether the Groundwater Dependent Ecosystem (GDE) Study prepared by the Tubb Canyon Conservancy and University of California, Irvine (UCI) represents Best Available Science for use by the Watermaster in adapting its GMP. This would be done in parallel to the TAC review of the GDE Study (see Attachment B). The work will involve reviewing the GDE study, conducting a briefing with UCI (together with the TAC), and preparing a recommendation report to the Board on the use of the GDE Study to support management planning. The draft scope of work for WY 2026 was discussed amongst the TAC at its May 1, 2025 meeting.²
- **Services to Parties with Manual-Read Meters: \$12,020 in WY 2026.** This work includes Watermaster staff services (provided by West Yost). This work is funded solely by Parties with manual-read meters (see matching revenue line-item).

² See Agenda Item IV of the May 1, 2025 TAC Meeting Agenda Package, available at: <https://borregospringswatermaster.com/wp-content/uploads/2025/04/20250501-TAC-Agenda-Package.pdf>

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Attachment B – Recommended Scope and Budget for Non-Routine Technical Consultant Services through WY 2030

The following is the non-routine technical scope of services recommended by the Technical Consultant, in coordination with the TAC where directed. This scope of work is to support compliance with Judgment and SGMA required work and supports Watermaster’s effort to achieve sustainability by 2040. Unlike the routine annual services, the scope of work varies from year to year (as shown in the Exhibit 1 Draft WY 2026 Budget).

Table B1 on the following page shows the line-item breakdown of costs by year for the remainder of WY 2025³ through WY 2030, for each of the following work items:

- Address DWR RCAs
- Completion of the 2026 5-Year GMP Assessment and Update
- Technical Work to Support 2030 Sustainable Yield Update (WY 2026 to 2029)
- Technical Work to Support 2035 Sustainable Yield Update
- Start the 2031 5-Year GMP Assessment and Update

The line-item costs for future work in WYs 2027 through 2030 were estimated based on WY 2026 dollars and escalated to account for inflation. For each item, any key assumptions are noted with the below scope descriptions.

As shown in Table B1 – the total cost to perform this work from WY 2025 through 2030 is \$682,642. Of this, \$65,000 is assumed to be performed in WY 2025, which was presented for approval by the Board at the June meeting in Agenda Item IV.B.⁴ The remaining \$617,642 will be spent over the five-year period of WY 2026 through 2030. A summary description of the scope of work for each line item follows Table B1.

³ June to September 2025.

⁴ If utilizing unspent budget in WY 2025 is not approved, then the costs will have to be shifted to WY 2026. This could jeopardize meeting the June 2026 deadline for the 5-Year GMP Assessment and Update.

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Table B1. Line Item Costs of Non-Routine Technical Scope of Services through WY 2030 ¹							
Technical Scope Items	WY 2025 ²	WY 2026	WY 2027	WY 2028	WY 2029	WY 2030	Total Cost
Total all Scope Items	\$ 65,000	\$ 72,592	\$ 122,500	\$ 158,100	\$ 150,750	\$ 113,700	\$ 682,642
Address DWR Recommended							
Corrective Actions (RCAs)	\$ 46,326	\$ 27,514	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000	\$ 153,840
<i>RCA 1 - Management Areas</i>		\$6,131					\$ 6,131
<i>RCA 2 - Domestic Well Mitigation</i>		\$7,982					\$ 7,982
<i>RCA 3 - Groundwater Level SMC</i>	\$14,926	\$3,731					\$ 18,657
<i>RCA 4 - Groundwater Storage SMC</i>	\$7,550	\$1,887					\$ 9,437
<i>RCA 5 - Groundwater Quality SMC</i>	\$6,000	\$1,500					\$ 7,500
<i>RCA 6 - Land Subsidence</i>	\$9,286	\$3,517					\$ 12,803
<i>RCA 7 - Judgment/GMP Relationship</i>	\$8,564	\$2,766					\$ 11,330
<i>Undefined RCA Follow-on Work</i> ³			\$20,000	\$20,000	\$20,000	\$20,000	\$ 80,000
5-Year GMP Assessment and Update (2026)	\$ 18,674	\$ 29,336	\$ -	\$ -	\$ -	\$ -	\$ 48,010
<i>BVHM Pumping Projections Update</i>	\$12,000						\$ 12,000
<i>Finalize 2026 5-Year Assessment Report</i>	\$6,674	\$23,854					\$ 30,528
<i>Prepare GMP Redline Document</i>		\$5,482					\$ 5,482
Technical Work for 2030 Sustainable Yield	\$ -	\$ 15,742	\$ 102,500	\$ 138,100	\$ 130,750	\$ -	\$ 387,092
<i>Evaluate the GDE Study Report (TAC share)</i>		\$15,742					\$15,742
<i>Assess BVHM Updates: HCM updates</i>			\$75,400				\$75,400
<i>Assess BVHM Updates: Simulation of GDEs</i>			\$27,100				\$27,100
<i>Evaluate New Monitoring Data</i>				\$29,100			\$29,100
<i>Develop Methods to Perform Model Updates</i>				\$15,000			\$15,000
<i>Upgrade BVHM Version of MODFLOW-OWHM</i>				\$94,000			\$94,000
<i>Update and Validate the BVHM</i>					\$60,900		\$60,900
<i>Recalibrate BVHM and Determine the 2030 SY</i>					\$69,850		\$69,850
Technical Work for 2035 Sustainable Yield	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 17,800	\$ 17,800
<i>Prepare Scope and Budget for the 2035 SY</i>						\$17,800	\$17,800
5-Year GMP Assessment and Update (2031)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 75,900	\$ 75,900
<i>Evaluate Sustainability of 2030 SY via BVHM Projections</i>						\$45,900	\$45,900
<i>Start 5-Yr GMP Assessment and Update</i>						\$30,000	\$ 30,000
Notes:							
1 -- The line-item costs for future work in WYs 2027 through 2030 were estimated based on WY 2026 dollars and escalated to account for inflation.							
2 -- Assumes that the Board approves use of unspent budget in WY 2025 to perform this work. Requires Supermajority vote. If not approved, the cost would need to be shifted to WY 2026.							
3 -- This line item is included as a placeholder acknowledging that future follow-on work will be required. It is budgeted as \$20,000 per year, but there is no way to know at this time what the actual costs will be. Staff recommend that this placeholder budget remain and not be set at							

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Address DWR Recommended Corrective Actions (RCAs). The DWR issued seven RCAs to the Watermaster as part of its approval of the GMP. In all cases, how the RCA was addressed, or is planned to be addressed, will be documented in the 2026 5-Year GMP Assessment Report and will necessitate redlining the GMP for clarity. The strategy for addressing each RCA is summarized below. The costs are laid out by RCA in Table B1. Note that some RCAs will have follow-on costs that are not able to be estimated at this time. The RCA cost estimates do not include these follow-on costs, however there is a line item for “undefined future GMP implementation actions” that could cover this undefined future cost. **As shown in Table B1, the total cost for this line item is \$153,840. Of this \$73,840 are for defined work in WYs 2025 and 2026. The remaining \$80,000 is for future undefined work that could result from addressing DWR comments and be performed over WYs 2027 through 2030.**

- *RCA 1 – Management Areas.* Addressing this RCA involves redlining the GMP to clarify the application and use of Management Areas in the GMP. Prior to including the redline in a final package for review by the Board and public, the redline will be reviewed by the TAC. This RCA is intended to be resolved as of publishing the 2026 GMP Assessment Report and GMP Redline.
- *RCA 2 – Domestic Well Mitigation.* Addressing this RCA will require Watermaster to develop a policy to mitigate impacts to domestic well users caused by actions performed in accordance with the Judgment and GMP (e.g. allowance of continued declines in groundwater levels during the Rampdown). Resolution of this RCA will be addressed over time as follows:
 - As a first step, an approach to developing a policy will be prepared and documented in the 2026 5-Year Assessment Report and redlined in the GMP.
 - As a second step, the approach will be implemented in WY 2027 and beyond. Table B1 does not address the costs of implementation directly as these will be unknown until the first step is completed in WY 2026.
- *RCA 3 – Groundwater Level SMC.* Addressing this RCA requires technical work and coordination with the TAC. The work will involve improving the sustainable management criteria (SMC)⁵ to include better quantifiable definitions of Undesirable Results and finalizing the update of previously identified illogical SMC defined in the GMP. This RCA will result in redlines to the GMP to clarify/update the SMC. This RCA is intended to be resolved as of publishing the 2026 GMP Assessment Report and GMP Redline.
- *RCA 4 – Groundwater Storage SMC.* Addressing this RCA requires minimal technical work and coordination with the TAC. The work will involve improving the SMC to include align with the Rampdown schedule defined in the Judgment and will result in redlines to the GMP to clarify/update the SMC. This RCA is intended to be resolved as of publishing the 2026 GMP Assessment Report and GMP Redline.
- *RCA 5 – Groundwater Quality SMC.* Addressing this RCA involves redlining the GMP to clarify the application of the SMC. This will be done in coordination with the TAC. Given the lack of

⁵ SMC include minimum thresholds, interim milestones, and measurable objectives.

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clarity and guidance from DWR as it relates to addressing water quality under SGMA, there may be follow-on work recommended for future years as an outcome of addressing the RCA. Thus, this RCA may need to be addressed in two phases. Table B1 does not address any future costs as these will be unknown until the SMC clarifications are discussed with the TAC and Board.

- *RCA 6 – Land Subsidence.* Addressing this RCA requires technical work and coordination with the TAC. The work will involve determining if SMC are required as recommended by DWR. If the approach to land subsidence is updated, the GMP may need to be redlined. This RCA will be resolved as of publishing the 2026 GMP Assessment Report and GMP Redline.
- *RCA 7 – Relationship of the Judgment and GMP.* Addressing this RCA requires coordination with the authors of the GMP and the subcommittee assigned to facilitate coordination with the attorneys and DWR. The goal is to prepare a memorandum directly addressing DWR’s confusion about the relationship of the documents. This will likely result in redlining the GMP for clarification. This RCA is intended to be resolved as of publishing the 2026 GMP Assessment Report and GMP Redline.
- *Undefined future GMP implementation actions following completion of 5-Year Assessment.* This line item is included as a placeholder acknowledging that future follow-on work will be required. It is budgeted as \$20,000 per year, but there is no way to know at this time what the actual costs will be. Staff recommend that this placeholder budget remain and not be set at a lower cost to ensure sufficient revenue planning.

Completion of the 5-Year GMP Assessment and Update. This work includes updating the BVHM projections, finalizing the 5-Year Assessment Report, and updating the GMP. **As shown in Table B1, the total cost for this line item is \$48,010.** Staff recommend this be performed starting in WY 2025 and finish by the June 2026 DWR deadline. Each item is described below.

- *Update the BVHM Projections*⁶. The TAC has recommended that the BVHM projections be updated to assess a revised pumping projection that shifts some pumping from the Central and/or South Management Areas to the North Management Area to support understanding of the sustainability of the Rampdown, refined scoping of future BVHM updates, setting of the SMC to address DWR RCAs, and development of Watermaster policy to address areas that may not achieve sustainability (if necessary).
- *Finalize 5-Year Assessment Report.* A Framework to Complete the 5-Year GMP Assessment was prepared using SGM funding in WY 2025.⁷ Table F-1 of the Assessment Framework, enclosed at the end of this Attachment B, describes the scope of work to complete the 5-Year Assessment Report. The work to address the RCAs will significantly advance completion of the report. This step is to finalize all ten section of the report, address comments received, and submit the report to the DWR by June 25, 2026.

⁶ The Board discussion of Agenda Item IV.B in the June 18, 2025 meeting could affect the cost and scope of this line item. Not knowing the potential outcome, this remains in the recommended budget.

⁷ Available on the Watermaster’s website at: <https://borregospringswatermaster.com/wp-content/uploads/2025/05/C7-d-5-year-Assessment-Framework.pdf>

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- *Redline GMP.* As noted in the above discussion of addressing the DWR RCAs, the GMP will need to be redlined so that it is more clearly understood by DWR and is reflective of updates to elements such as SMC. Most of the costs to redline are included in the RCA tasks. This step is to compile the draft and final redline for public review and DWR submittal.

Technical Work to Support 2030 Sustainable Yield Update. The TAC prepared a recommended scope of work to redetermine the 2030 Sustainable Yield, which was approved by the Board in December 2024. The process involved the following steps: (1) evaluate new data and information to determine if BVHM updates are needed, (2) develop methods to update BVHM, if needed, (3) update and validate the BVHM, (4) recalibrate the BVHM, if needed, (5) compute the 2030 Sustainable Yield. Subsequently, it has also been identified that the model will likely need to be converted to the latest version of MODFLOW-OWHM. **As shown in Table B1, the total cost for this line item is \$387,092 over WYs 2026 through 2029.**

The December 2024 scope of work identified two priority data items to evaluate in step (1), including the GDE Study Report and the latest results of the metering and groundwater monitoring program. One additional priority item was identified in March 2025 – updating the hydrogeologic conceptual model (HCM) of the South Management Area. Based on the priority items, the following scope of work is recommended:

- *Determine if the GDE Study is Best Available Science.* The Watermaster has a policy on the use of Best Available Science. The first step in the use of technical work that was not developed by the Watermaster is to determine if the work constitutes Best Available Science. This task is for the TAC to determine if the GDE Study prepared by the Tubb Canyon Conservancy and UCI is Best Available Science. If it is, follow-on technical work will be recommended to ensure the Watermaster’s GMP and BVHM are in alignment with the science. This work is proposed to be done in parallel with a review of the GDE study by the EWG. The work will involve reviewing the GDE study, conducting a briefing with UCI (together with the EWG), and preparing TAC and Technical Consultant Recommendation Reports to the Board on the use of the GDE Study to support management planning. The costs shown in Table B1 represent the costs associated with the TAC process and are additive to the \$20,000 utilized in the EWG budget to facilitate the EWG portion of the work.
- *Assess BVHM Updates: HCM.* This task was developed in collaboration with the TAC and involves a process to review new information on well construction, groundwater elevations, and pumping tests to update the HCM of the South Management Area.
- *Assess BVHM Updates: Simulation of GDEs.* This is a follow-on task if the GDE study is determined to be based on best available science as it relates to evapotranspiration (ET) by the mesquite bosque. This task may assess and determine if the BVHM accurately simulates the amount of ET; however, the scope of work will be refined by the TAC following results of the prior task to determine if the GDE Study is Best Available Science.
- *Assess BVHM Updates: New Monitoring Data.* This task will review and analyze the latest pumping and groundwater level data to determine if further updates and calibration of the Farm Process in the BVHM are needed.

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- *Develop Methods to Perform Model Updates.* Based on the prior tasks to assess the BVHM, this task will develop a methodology and scope of work to update, validate, and recalibrate the BVHM to better simulate basin conditions (as compared to measured data).
- *Upgrade BVHM Version of MODFLOW-OWHM.* In this task the current BVHM will be converted to the updated model platform.
- *Update and Validate the BVHM.* In this task, the BVHM will be updated and validated following the methods defined in the prior steps.
- *Recalibrate the BVHM and Determine 2030 Sustainable Yield.* In this step the BVHM will be recalibrated, and the 2030 Sustainable Yield will be computed in accordance with the method defined and used to set the 2025 Sustainable Yield.

Technical Work to Support 2035 Sustainable Yield Update. This work will begin in WY 2030 with the TAC developing the recommended scope of work and budget-level cost estimate to redetermine the 2035 Sustainable Yield. The scope of work will be developed from October to December 2029 to meet the January 1, 2030 deadline defined in the Judgment. This work will be utilized to set the future budget projection for WYs 2031 to 2035. **As shown in Table B1, the total cost for this line item is \$17,800.**

Start the 2031 5-Year GMP Assessment and Update. The next 5-year assessment (and potential GMP update) is due to the DWR in June 2031. This work should begin in WY 2030 and will include using the BVHM to test the sustainability of the 2030 Sustainable Yield and beginning to prepare the Assessment Report. **As shown in Table B1, the total cost for this line item is \$75,900.**

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Table F-1. Assessment Report Outline and Scope and Schedule to Complete the Administrative Draft of Chapters

Assessment Report Chapter Title	Section Reporting Objective	% Complete by March 31, 2025	Work to be Completed After March 31, 2025	Recommend Approach and Schedule to Complete Administrative Draft of Chapter
Executive Summary	Provides an overview of the entire report, including highlighting key findings and recommendations. This section also demonstrates how this Assessment meets the regulatory requirements for periodic assessments, as defined in § 356.4 of the GSP Regulations by referencing the Periodic Evaluation Elements Guide	5%	<p>Since this section is a summary of the entire report and its key highlights, it cannot be completed until all other sections have been finalized. Work includes:</p> <ul style="list-style-type: none"> • Complete ES text after all of other Assessment Report Chapters have been completed • Prepare Table ES-1 – Periodic Evaluation Elements Guide 	Draft Executive Summary in March 2026 for inclusion in the March 25, 2026 Draft Assessment Report.
Chapter 1. Regulatory Background and Assessment Objectives	Provides background on the Watermaster, the Judgment and GMP, and the purpose and objectives of the Assessment to facilitate understanding of how the report is organized.	95%	<p>No anticipated changes are expected to be needed to the section, other than minor text additions and/or edits. Any of the following could result in minor changes to this section:</p> <ul style="list-style-type: none"> • Changes to standard introductory descriptions in the WY 2025 Annual Report • Changes to report organization (e.g. order of Chapters) 	Draft final version of Chapter 1 in March 2026 for inclusion in the March 25, 2026 Draft Assessment Report.
Chapter 2. Administration, Engagement, and Coordination	Describes the Watermaster’s administrative functions, coordination efforts with other agencies, and public outreach efforts through various forms of meetings and workshops. It also describes actions that were taken during the reporting period to adopt policies and procedures in furtherance of the sustainability goal for the basin, including amendments to the Judgment.	95%	Update text and tables to reflect any additional or changed administrative or outreach information through end of reporting period (September 30, 2025).	Draft final version of Chapter 2 in March 2026 for inclusion in the March 25, 2026 Draft Assessment Report.

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Table F-1. Assessment Report Outline and Scope and Schedule to Complete the Administrative Draft of Chapters

Assessment Report Chapter Title	Section Reporting Objective	% Complete by March 31, 2025	Work to be Completed After March 31, 2025	Recommend Approach and Schedule to Complete Administrative Draft of Chapter
Chapter 3. Recommended Corrective Actions	Provides an overview of the seven RCAs. For each RCA, it describes the RCA as presented by DWR, summarizes DWR feedback on the Alternative Plan that relates to the RCA, presents the Watermaster’s plan to address each RCA, and summarizes the recommended, actual, or planned changes to the Judgment, GMP, and/or other Watermaster program or policy that are expected from addressing the RCA.	5%	<p>The RCAs were not provided by DWR until February 25, 2025 and have yet to be discussed with the Board. Thus, no work on this section could be performed.</p> <p>The entire Chapter will need to be written following discussions with the Board on how to address each of the RCAs.</p>	<ul style="list-style-type: none"> Some RCAs are technical, some are policy related, some are simple clarifications. Staff will organize RCAs into logical groupings to be addressed, in collaboration with the TAC (where technical), and make recommendations. Board will direct staff based on recommendations. This will be done from May 2025 to Dec 2026. All outcomes will be documented as draft Chapter 3 by January 2026 for TAC and Board review, including any redline to the GMP.
Chapter 4. Status of Projects and Management Actions	<p>Provides an overview of the Judgment management actions, the GMP PMAs, and describe the relationship between them. Describes progress to date on implementing each, including a discussion of how implementation has benefited the Basin and contributed to achieving sustainability.</p> <p>To the extent that any PMA will be modified to address an RCA, the changes would be discussed, and the status would be presented relative to the revised PMA.</p>	70 – 90%	<p>Some of the DWR RCAs relate to the PMAs and it may be necessary to clarify and/or modify one or more PMAs. PMAs are a policy decision and thus must be vetted through a Board process, following receipt of technical recommendations from Watermaster staff and/or the TAC or EWG. This section will be updated after changes have been approved by the Board, if any.</p> <p>If no changes to the PMAs are made, then no anticipated changes are needed to the section, other than updating the implementation status through September 30, 2025.</p>	<ul style="list-style-type: none"> Discuss communication of the relationship between Judgment management actions and PMAs with Board in light of RCA No. 7. Work with Board to review management action progress and need to change or add management actions in May to December concurrent with RCA discussions for Chapter 3. Finalize Chapter 4 text and tables based on Board direction by January 2026 for TAC and Board review, including any redline to the GMP.

Item IV.C

Table F-1. Assessment Report Outline and Scope and Schedule to Complete the Administrative Draft of Chapters

Assessment Report Chapter Title	Section Reporting Objective	% Complete by March 31, 2025	Work to be Completed After March 31, 2025	Recommend Approach and Schedule to Complete Administrative Draft of Chapter
Chapter 5. New Information	Summarizes new data and information acquired by the Watermaster during the reporting period. For significant new information, the report identifies how that data is being used by the Watermaster, how the new information impacts the Basin characterization, where to find additional information within the report, and indicates if any changes to the Judgment/GMP were made as a result of the new information.	90%	<p>This section is nearly complete, but does not yet identify updates that will be made to the Judgment or GMP based on new information. This needs to be discussed with the Board.</p> <p>To complete the section, Watermaster will:</p> <ul style="list-style-type: none"> • Make recommendations to the Board on what changes should be made to the Judgment/GMP, if any • Add any new data/information items that becomes available before finalizing the draft report 	<ul style="list-style-type: none"> • Make Recommendations to the Board on what changes should be made to the Judgment/GMP, if any, for each new information item. • Complete Table 5-1 with information on any recommended changes to the Judgment/GMP • Update text and Table 5-1 to reflect any additional significant new information obtained through September 30, 2025. • Publish draft Chapter 5 by October 2025 for Board and TAC review. • Incorporate review comments in March 25, 2026 draft Assessment Report.
Chapter 6. Basin Setting Based on New Information	This chapter provides an overview of the Basin Setting in the GMP, identifies the elements of the Basin Setting that have changed based on new information reported in Chapter 5, and describes the revised elements of the Basin Setting based on the new information. For each element described, the section notes where and how the GMP should be updated to reflect the updated characterization.	70-90%	<ul style="list-style-type: none"> • Update text of Section 6.2.1 based on any further updates made to the BVHM • Complete text and tables of Section 6.2.2 – Aquifer Properties • Complete text and tables of Section 6.2.3 – Water Budget • Determine if any additional changes to the Basin Setting are needed based on responses to the DWR’s RCAs. This will be a process done in collaboration with the TAC. If changes are warranted, add text to Section 6.3 	<p>How this section is completed, and the level of effort to complete will depend on how the Board proceeds with the recommendations in the March 31, 2025 memo regarding use of the 2022 BVHM to assess the sustainability of future groundwater conditions. Once that path is selected, this text can be completed</p> <p>A draft of Chapter 6 should be prepared by August 2025, including any redline to the GMP. A final draft of Chapter 6 should be prepared by November 2025.</p>

Item IV.C

Table F-1. Assessment Report Outline and Scope and Schedule to Complete the Administrative Draft of Chapters

Assessment Report Chapter Title	Section Reporting Objective	% Complete by March 31, 2025	Work to be Completed After March 31, 2025	Recommend Approach and Schedule to Complete Administrative Draft of Chapter
Chapter 7. Monitoring Networks	Describes the monitoring networks, improvements that have been made to the monitoring network over the reporting period, identifies data gaps, and provides recommendations for improvements to the monitoring network.	95%	<p>This section is nearly complete. Remaining work is to:</p> <ul style="list-style-type: none"> Update text, tables, and figures with any additional wells that are added to the monitoring program through fall 2025. Update section 7.4 – Future Activities for WY 2026 through WY 2030 with any additional work identified 	<ul style="list-style-type: none"> In June 2025 TAC should review outcomes of Spring 2025 monitoring event and make recommendations for future actions Draft final version of Chapter 7 in November 2026 for inclusion in the March 25, 2026 Draft Assessment Report.
Chapter 8. Basin Conditions Relative to Sustainable Management Criteria	Demonstrates progress towards achieving the Sustainability Goal of the Basin by evaluating current and projected Basin conditions relative to the SMC for each relevant Sustainability Indicator applicable to Borrego Springs. It also discusses any changes to the SMC or Representative Monitoring Network. If the analysis demonstrates that the Basin is not on track to achieving sustainability for any indicator, then recommended actions to address the challenge are described.	60%	<p>Watermaster staff have analyzed all available data through Fall 2024 and generated charts, tables, and maps depicting the data and trends. The charts tables and maps will be updated to include the results of monitoring events through Fall 2025 once the data is available. The templates are set up to compare the groundwater level, storage, and quality information to the relevant SMCs, which may change from what is in the current GMP.</p> <p>The DWR RCAs recommend improvements to the SMCs, particularly adding quantifiable metrics for several of the sustainability indicators. This has also been a recommendation of Watermaster staff. All technical information to support the update of the SMCs will be complete by March 31, 2025.</p>	<p>The establishment of SMCs requires TAC and stakeholder input. The TAC and Stakeholder input will be obtained through the TAC, Board, and Open House process, following discussions with the Board on how to address the DWR RCAs.</p> <p>The SMC updates will be drafted and reviewed for public input by October 2025.</p> <p>The final figures, tables, and text will be prepared from November 2025 through February 2026, for inclusion in the March 25, 2026 Draft Assessment Report.</p>

Item IV.C

Table F-1. Assessment Report Outline and Scope and Schedule to Complete the Administrative Draft of Chapters

Assessment Report Chapter Title	Section Reporting Objective	% Complete by March 31, 2025	Work to be Completed After March 31, 2025	Recommend Approach and Schedule to Complete Administrative Draft of Chapter
Chapter 9. Summary and Recommended Changes to the Judgment/GMP	Summarizes key take-aways from the assessment, any proposed amendments to the Judgment or GMP, and next steps for moving the Basin towards the Sustainability Goal.	5%	Since this section is a summary of the entire report and contains recommendations on changes to the Judgment or GMP (if any), it cannot be completed until the remaining report sections are complete and changes have been discussed with and approved by the Board.	Draft Chapter 9 in March 2026 for inclusion in the March 25, 2026 Draft Assessment Report.

Baseline Pumping Allocations, Revised Exhibit “4”

Exhibit “4”
BASELINE PUMPING ALLOCATIONS
UPDATED AS OF January 21, 2026

Owner(s)	Common Property Name	BPA¹ Acre Feet	APN(s)²	Well Number(s)²
Agri-Empire		574	140-290-10 140-320-19	010S006E23M001S (WM ID 1245906)
Rick and Joan Anson, co-trustees of the Anson Family Trust 08-18-08 ³		2	Unassigned	Unassigned
Alan & Tracy Asche		5	199-020-04	DEH1980-LWELL-8027 (WM ID 1246354)
Gary D. & Darlis A. Bailey		7	140-130-42	(WM ID 1246355)
David and Juli Bauer, co-trustees of the D&J Bauer Family Trust 11-18-04		500	140-010-11	WM ID 1245998 WM ID 1245999
David and Juli Bauer, co-trustees of the D&J Bauer Family Trust 11-18-04		400	140-070-17	WM ID 1245996
David and Juli Bauer, co-trustees of the D&J Bauer Family Trust 11-18-04		200	140-070-27	WM ID 1245994
David and Juli Bauer, co-trustees of the D&J Bauer Family Trust 11-18-04		311	140-110-14	WM ID 1245995

¹ Parties to the Judgment without BPA rights are not listed. Allocations to the Anza-Borrego Desert State Park and Borrego Unified School District (Borrego Elementary) are separate from BPA, per the terms of the Judgment.

² Except for BPA allocated to BWD and mutual water companies, BPA must be assigned to APN(s) and Well Number(s) to be effective per Section III.A of the Judgment. If state well number(s) are not found following a Party’s good faith review of DWR’s well completion report database, County well files and the Party’s available records, the Party shall provide the Watermaster Executive Director with a written summary of such good faith efforts to locate the state well number(s), and the Watermaster Executive Director shall assign local well number(s) (WM ID) in order to account for the Party’s exercise of its BPA.

³ Full amount is water credit to BPA conversion.

Owner(s)	Common Property Name	BPA¹ Acre Feet	APN(s)²	Well Number(s)²
Borrego Water District (purchase from D & J Bauer) ⁴		415	140-070-18	WM ID 1245997
Borrego Water District (purchase from W. Bauer) ⁵		670	140-010-08	DEH2016-LWELL-001642 (WM ID 1246624)
Borrego Air Ranch Mutual Water & Improvement Co.	Borrego Air Ranch	12	201-192-08 ⁶	011S007E30L001S (WM ID 1245852) 011S007E30G004S (WM ID 1245915)
T2 Tilting T, LLC	Borrego Springs Resort and Club Circle	1,462	198-021-08-00 198-270-18-00 199-010-16-00 199-010-17-00 199-010-18-00 199-010-19-00 199-010-23-00 199-010-24-00 199-010-25-00 199-010-26-00 199-080-10-00 199-011-04-00 199-100-24-00 199-080-11-00 199-080-20-00 199-080-21-00 199-080-22-00 199-080-15-00 199-080-16-00 199-080-17-00	011S006E04P001S (WM ID 1245829) WM ID 1245942 011S006E09B002S (WM ID 1245860)
Borrego Water District	N/A		N/A	N/A

⁴ In WY 2023, BWD purchased a portion of BPA, including the associated BPA parcel, from David and Juli Bauer, co-trustees of the D&J Bauer Family Trust 11-18-04. The BWD intends to fallow the land in accordance with the Judgment following standards and transfer the BPA rights to its primary BPA rights. Until the land is fallowed, the BPA purchased by BWD remains attached to the BPA Parcel and can only be pumped for use on the subject Parcel. Thus, the BPA assigned to BWD is shown as a stand-alone entry.

⁵ In WY 2023, BWD purchased the entirety of BPA, including the associated BPA parcel, from William M. Bauer. The BWD intends to fallow the land in accordance with the Judgment following standards and transfer the BPA rights to its primary BPA rights. Until the land is fallowed, the BPA purchased by BWD remains attached to the BPA Parcel and can only be pumped for use on the subject Parcel. Thus, the BPA assigned to BWD is shown as a stand-alone entry.

⁶ Water eligible for use at all parcels served by Borrego Air Ranch Mutual Water & Improvement Co. as shown on the attached service area map, and those parcels will be treated as the Original BPA Parcel.

Owner(s)	Common Property Name	BPA¹ Acre Feet	APN(s)²	Well Number(s)²
		2,591.05 ⁷		
Raymond A. Carpenter and Susan R. Carpenter, co-trustees of the Carpenter Family Trust 12-11-07		6	140-280-35	WM ID 1246761

⁷ Includes water credit to BPA conversion of 359 AF of BPA.

Owner(s)	Common Property Name	BPA¹ Acre Feet	APN(s)²	Well Number(s)²
Tenaja Ranch, LP ⁸	Cogan Ranch	4,741	140-130-24-00	DEH2012-LWELL-21118 (WM ID 1245989)
	Gable House		140-130-40-00	
			140-130-43-00	DEH1993-LWELL-9977 ⁹
	Gigi Ranch		140-130-01-00	
	Peg Leg Ranch		140-130-06-00	DEH2020-LWELL-002643 (WM ID 1246625)
			140-130-07-00	
	Rancho Caterina		140-130-08-00	DEH1995-LWELL-3866 (WM ID 1245987)
			140-130-09-00	
			140-130-10-00	
	De Anza Ranch		140-130-11-00	010S006E07A001S
			140-130-12-00	(WM ID 1245805)
			140-130-13-00	DEH1990-LWELL-10048 (WM ID 1245988)
			140-130-14-00	
			140-130-15-00	
	140-130-16-00			
			140-130-17-00	DEH2004-LWELL-15891 (WM ID 1245986)
			140-130-18-00	
			140-130-21-00	
			140-130-22-00	DEH2007-LWELL-18244 ¹⁰
			140-130-25-00	
	140-130-26-00	(WM ID 1245990)		
	140-130-27-00	DEH2021-LWELL-002808		
	140-130-41-00	(WM ID 1245991)		
	140-110-15-00			
	140-110-16-00			
	140-010-03-00			
	140-010-06-00			
	140-010-09-00			
	140-070-22-00			
Desert Farm LLC Scott M. Crumrine and Stacey L. Crumrine, co-trustees of the		21	141-210-61	DEH2015-LWELL-001073 (WM ID 1246626)

⁸ All of the jointly owned and operated properties are interconnected, with wells on some of the ranches serving other ranches.

⁹ Rancho Caterina 1, currently inactive and being replaced by Caterina Well 4 DEH2020-LWELL-002643.

¹⁰ Currently inactive. Owner in process of providing replacement well on the same parcel.

Owner(s)	Common Property Name	BPA¹ Acre Feet	APN(s)²	Well Number(s)²
Crumrine Family Trust 04-19-06				
CWC Casa Del Zorro, LLC	La Casa del Zoro Desert Resort and Spa	22	200-030-28-00 200-030-29-00 200-090-05-00 200-090-11-00 200-090-19-00 200-090-20-00 200-090-21-00 200-090-22-00 200-090-23-00 200-090-24-00 200-090-25-00 200-090-27-00 200-090-29-00 200-090-30-00 200-090-31-00 200-090-32-00 200-090-33-00 200-090-34-00 200-090-35-00 200-090-36-00 200-090-37-00 200-090-38-00 200-090-45-00 200-090-47-00 200-090-48-00 200-090-50-00 200-090-63-00 200-090-64-00 200-090-65-00	011S006E23E001S (WM ID 1245895)
De Anza Desert Country Club	De Anza Desert Country Club	957	140-185-19 140-242-62 140-261-01 140-264-08 140-242-57-00	010S006E20N001 (WM ID 1245866) WM ID 1246623
John B. & Silvia H. Hogan		8	199-01-112	WM ID 1246627
T2 Palms LLC		887	140-110-19 140-110-20 140-110-24	DEH1979-LWELL-4103 (WM ID 1245984) DEH1979-LWELL-4104

Owner(s)	Common Property Name	BPA¹ Acre Feet	APN(s)²	Well Number(s)²
			140-290-05 140-290-08	(WM ID 1245985) DEH1984-LWELL-4102 (WM ID 1245983)
Genus, L.P. ¹¹		112	141-030-35-00	Unassigned
John McGrory; JM Roadrunner, LLC	Cogan	536.87	140-130-44 140-130-45 140-029-11 141-030-60	010S006E15D003S ¹² (WM ID 1245811) 010S006E15D004S (WM ID 1245812)
JM Roadrunner, LLC	Road Runner I	671	140-130-28 140-130-34 140-130-35 140-130-36 140-130-38	010S006E15D003S (WM ID 1245811) 010S006E15D004S (WM ID 1245812)
JM RoadRunner, LLC	Road Runner II	387	141-030-26 141-030-27	WM ID 1245980 WM ID 1245981 010S006E15D003S (WM ID 1245811) 010S006E15D004S (WM ID 1245812)
Robert Larkins ¹³		2	Unassigned	Unassigned
Michael Maiter and John Savittieri ¹⁴		1	200-253-02-00 140-060-54-00 140-060-55-00	Unassigned
Gamini D. Weerasekera	Mountain Springs Organics	103	140-110-21	010S006E17J003S (WM ID 1245815) 010S006E17J001S (WM ID 1245814) WM ID 1246622
Daniel Lee Fetzer and Jennifer Fay Fetzer		14	141-210-16	010S006E34M001S DEH1982-LWELL-1076

¹¹ Full amount is water credit to BPA conversion.

¹² Each of the three ranches owned by JM Roadrunner, LLC, with John McGrory as its principal, are interconnected, with water produced from some ranches used to serve other ranches.

¹³ Full amount is water credit to BPA conversion.

¹⁴ Full amount is water credit to BPA conversion.

Owner(s)	Common Property Name	BPA¹ Acre Feet	APN(s)²	Well Number(s)²
Doug & Patricia Munson ¹⁵		1	Unassigned	Unassigned
Ronald Pecoff		114	141-030-14	010S006E29N002S (WM ID 1245905) 010S006E29N001S (WM ID 1245824)
The Roadrunner Club at Borrego, LP ¹⁶	Roadrunner Golf and Country Club	520	141-210-64-00	WM ID 1245946
RTA Borrego, LLC ¹⁷		12	Unassigned	Unassigned
Jose G. & Maria E. Sanchez		4	199-130-03	Unassigned
Seley Ranches, L.P.		2,226	140-070-14 140-070-16 140-090-04	010S006E09G001S (WM ID 1245971) 010S006E09Q001S (WM ID 1245974) DEH2003-L WELL-15552 (010S006E10L001S) (WM ID 1245975)
Soli Organic Inc.		61	141-160-47	DEH2006-LWELL-17726 (WM ID 1245979)
Max Siefker ¹⁸		2	Unassigned	Unassigned
Brian Siefker, trustee of the Brian Siefker Trust 12-18-01 ¹⁹		3	141-271-07-00	Unassigned
Kent R. Smith, trustee of the Smith Kent R. Revocable Living Trust 01-04-90 ²⁰		50	141-080-05-00	Unassigned
The Springs RV and Golf Resort, LP	The Springs at Borrego RV Resort and Golf Club	261.7	141-210-62-00 141-210-65-00	WM ID 1245948

¹⁵Full amount is water credit to BPA conversion.

¹⁶ Includes water credit to BPA conversion of 171 AF of BPA.

¹⁷Full amount is water credit to BPA conversion.

¹⁸Full amount is water credit to BPA conversion.

¹⁹ Full amount is water credit to BPA conversion.

²⁰ Includes water credit to BPA conversion of 32 AF of BPA.

Owner(s)	Common Property Name	BPA ¹ Acre Feet	APN(s) ²	Well Number(s) ²
T2 Borrego LLC		965	140-010-10 140-070-02	010S006E05F001S (WM ID 1245848) 010S006E08B001S (WM ID 1245806)
T2 Borrego LLC ²¹	Ram's Hill Golf Club	2,536	200-120-20 200-160-26 200-160-27 200-160-28 200-273-03 200-273-08 200-120-29 200-120-30 200-120-31 200-120-39 200-120-41 200-120-48 200-120-51 200-120-52 200-120-53 200-140-12 200-160-30 200-210-21 200-210-22 200-271-03 200-271-04 200-271-06 200-271-07 200-271-15 200-271-16 200-271-21 200-271-22 200-271-23 200-271-24 200-271-29 200-271-32 200-271-35 200-271-36 200-271-37 200-271-38 200-272-08 200-273-02	011S006E24Q002S (WM ID 1245910) 011S006E25A001S (WM ID 1245877) 011S006E25C002S (WM ID 1245909) 011S006E25C001S (WM ID 1245881) 011S006E26H001S (WM ID 1245912) 011S006E26B001S (WM ID 1245911)

²¹ Includes water credit to BPA conversion of 1,523 AF of BPA.

Owner(s)	Common Property Name	BPA¹ Acre Feet	APN(s)²	Well Number(s)²
			200-273-04 200-273-05 200-273-06 200-273-07 200-274-02 200-275-08 200-275-09 200-275-10 200-275-11 200-311-12 200-311-13 200-311-14 200-311-15 200-311-16 200-311-17 200-311-18 200-340-49 200-340-50 200-340-51 200-340-91 200-340-92 200-340-93 200-340-94 200-340-95 200-350-01 200-350-24 200-360-17 200-360-18 200-370-37 200-370-38 200-380-29 200-400-02 200-400-03 200-400-04 200-400-05 200-400-06 200-400-07 200-400-08 200-400-09 200-400-10 200-401-07 201-240-01	

Owner(s)	Common Property Name	BPA¹ Acre Feet	APN(s)²	Well Number(s)²
T2 Farms LLC		482.25	140-070-31	010S006E09C001S (DEH1990-LWELL-6865) (WM ID 1245807)
T2 Borrego, LLC (Purchase from Bagdasarian Farms LLC)		1,142	140-070-15 140-070-20 140-070-28	DEH1990-LWELL-3907 (WM ID 1245976) DEH1981-LWELL-10728 ²² DEH2011-LWELL-21069 (WM ID 1245977)
Joel Vanasdlen		36	199-160-04 199-160-40	Unassigned
Trustee of the Steven L. Phillips Separate Property Trust		82	141-030-28	DEH1991-LWELL-10402 (WM ID 1246628)
Wisdom Gabriel B&Weis-Wisdom Diana Family 2008 Trust 08- 01-08 ²³		1	198-251-07-00 198-251-08-00	Unassigned
Trustee of the Steven L. Phillips Separate Property Trust		158	141-210-670	010S006E33C002S (WM ID 1245921)
Ashley Bilyk and Lee Tyler Bilyk		18.13	140-130-44 ²⁴	010S006E15D003S ²⁵ (WM ID 1245811) 010S006E15D004S (WM ID 1245812)
TOTAL BPA		24,293		

²² Currently inactive.

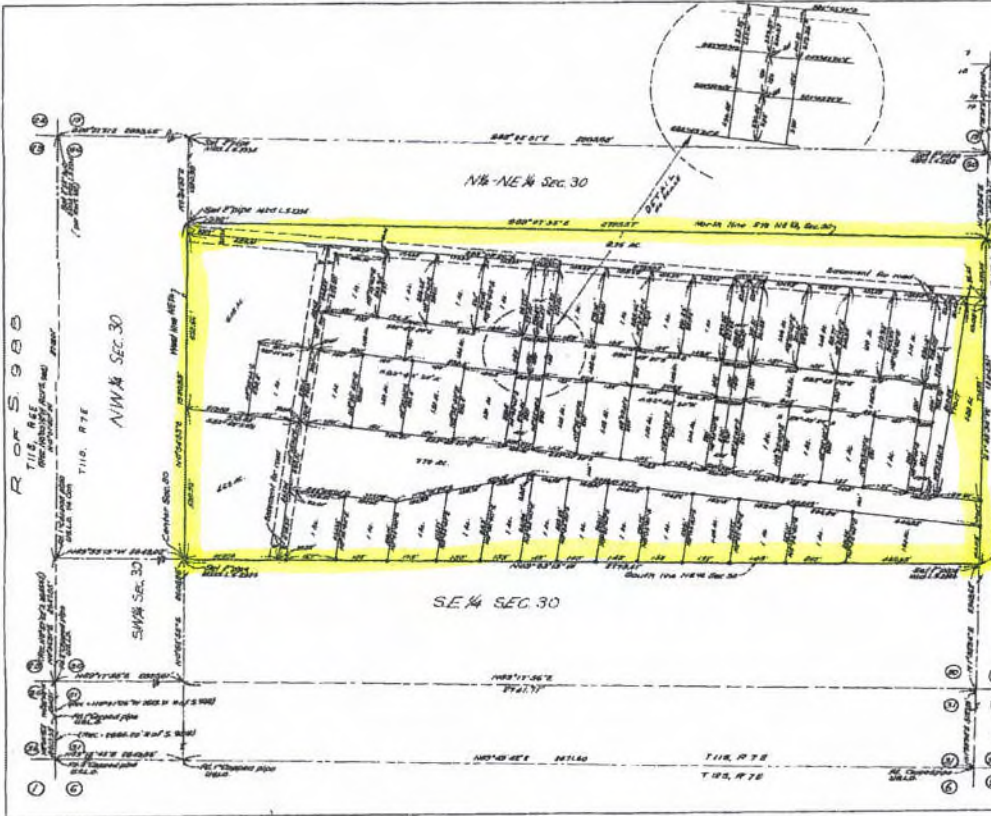
²³ Full amount is water credit to BPA conversion.

²⁴ Interconnected parcel with John McGrory and JM Roadrunner, LLC.

²⁵ Each of the three ranches owned by JM Roadrunner, LLC, with John McGrory as its principal, are interconnected, with water produced from some ranches used to serve other ranches. 140-130-44 is only served by one JM Roadrunner well. This well is also used across the JM Roadrunner properties.

R. OF S. NO. 1841

RECORD OF SURVEY
OF
S 1/2 OF THE NE 1/4 OF SEC. 30
T 11 S, R 7 E, S.B.M.
SAN DIEGO COUNTY, CALIF.



Block of bearing derived from 1845 A.M. 300 in 4th course, angle of 30
degrees 7' 30", which is in favor of Lessor's title, and is
in place of corner with corner with elongated L.C. 23M unless
otherwise noted.

I, James G. Peterson, a licensed surveyor of the State of California,
certify that this survey was made by me or under my direct supervision or
about October 1, 1922, that the name of owner was authorized me to
make this survey, was in the field, and that this survey is true and
complete insofar as the monuments are of his character and
occupy the positions indicated and are sufficient to enable the
survey to be retraced.

James G. Peterson
Licensed Surveyor No. 2254

I, James G. Peterson, hereby state that I am the surveyor who
made this record of survey, that the land is divided into lots or
parcels, each of a net area of 1 acre or more, and the Board
of Supervisors of the County of San Diego has approved
this record of survey as to its accuracy and that the
provisions are for and to be.

James G. Peterson
Licensed Surveyor No. 2254

I, J.H. Mack, County Surveyor of San Diego County, state that I have
examined this map with respect to all the accuracy of survey and
mathematical data (50) the conformity to other records or
any other evidence of the error of such other records (50)
compliance with the provisions of Chap. 15, Div. 3, Business and
Professional Code and that of satisfactory, I further certify
that it does not affect the record of a survey of a sub-
division as defined in Section 11325 of the Subdivision Map
Act.

J.H. Mack, County Surveyor
J.H. Mack
Assistant

File No. 53381
Filed at the request of James G. Peterson, this 21st day of May,
1922, at 3:31 minutes past 3 o'clock P.M.

By *H.A. Schneider*
County Recorder

NOTE: Corner between Sections 19-20-21 & 22 of T. 11 S., R. 7 E., S. 29 N. 1/2 S. 30
was established by 32 were established by 32 were established by 32 were established by 32
Provisional measurement between corners between
Sections 19-20-21 and Sections 22-23, T. 11 S., R. 7 E., S.
Sections 4 & 5, T. 11 S., R. 7 E.

R. OF S. 990

T. 11 S., R. 7 E.

NW 1/4 SEC. 30

SE 1/4 SEC. 30

T. 11 S., R. 7 E.

Amendments to Prior Water Rights Accounting

Appendix F. Record of Amendments to Water Rights Accounting

Water Year	Description of Change(s) to Water Rights Accounting ¹	Date Changes made to Water Rights Accounting	Attachment ¹
2021	<p>The WY 2021 accounting was amended to account for the over-estimation of WY 2021 pumping for three Parties.</p> <p>For two Parties, sufficiently detailed meter data was provided in WY 2022 to reasonably re-estimate pumping for WY 2021. Due to the over-estimation, the Parties over-paid assessments in WY 2022. The Parties chose to use the overpayment credit to elect the eligible Carryover that would have been available from WY 2021 had pumping been correctly estimated at the time. The two Parties with amended records based on metered pumping data are:</p> <ul style="list-style-type: none"> • John Doljanin - Based on metered pumping data, the WY 2021 pumping was adjusted from an estimated 820 acre-feet (af) to a metered value of 384.02 af. • William M. Bauer - Based on metered pumping data, the WY 2021 pumping was adjusted from an estimated 670.16 acre-feet (af) to a metered value of 372.96 af. 	October 2022	F-1
	<p>Additionally, pumping for a third Party was amended to account for the over-estimation after learning in WY 2024 that the Steven L. Phillips Separate Property Trust acquired the BPA parcels/rights assigned to Wright Family Living Trust 06-19-89 in WY 2021. Until WY 2024, Watermaster was not in communication with Mr. Phillips and the pumping volumes for WY 2021-2023 were estimated based on the prior property use by the former BPA holder, the Wright Family Living Trust 06-19-89. Mr. Phillips is in fact using far less water than the former owner and provided information to correct the pumping estimates for WY 2021 through WY 2023 and to estimate pumping in WY 2024. The WY 2021 pumping was adjusted from 158.43 af to 8.60 af.</p>	October 2024	
2022	<p>The WY 2022 accounting was amended to account for the over-estimation of WY 2022 pumping for Wright Family Living Trust 06-19-89 (now Steven L. Phillips Separate Property Trust) based on updated information provided by Mr. Phillips (see description above). The WY 2022 pumping was adjusted from 158.43 af to 29.38 af.</p>	October 2024	F-2
2023	<p>Two revisions were made to the WY 2023 accounting:</p> <ul style="list-style-type: none"> •The WY 2023 accounting was amended to account for the over-estimation of WY 2023 pumping for Wright Family Living Trust 06-19-89 (now Steven L. Phillips Separate Property Trust) based on updated information provided by Mr. Phillips (see description above). The WY 2023 pumping was adjusted from 158.43 af to 30.91 af. • In WY 2024, BPA holder Joel Vanasdlen informed Watermaster Staff that there was a miscommunication, and he did not mean to elect Carryover from WY 2023. The WY 2023 Water Rights Accounting was corrected to show that Vanasdlen elected zero acre-ft of eligible Carryover. 	October 2024	F-3
2024	No revisions have been made to the WY 2024 Water Rights Accounting.	N/A	N/A

1) Changes to Water Rights Accounting are highlighted in yellow in the associated attachments.

F-1. AMENDED WY 2021 Water Rights Accounting Summary for the Borrego Springs Subbasin - (all values in acre-feet) - amended values highlighted in yellow with red text

BPA Party or Party with Other Non-De Minimis Water Rights	BPA or Other Non-De Minimis Rights as of Oct. 1, 2020 ¹	Permanent Transfer of BPA ^{1,2} in WY 2021	BPA or Other Non-De Minimis Rights as of Sept. 30, 2021	WY 2021 Annual Allocation: 95% of BPA ³ ; 100% of non-BPA rights ^{4,5}	Carryover Account Balance as of October 1, 2020 ^{5,1}	Carryover Account Limit ^{5,3}	Leased or Transferred Annual Allocation in WY 2021 ²	Total Allowable Pumping for WY 2021	Cumulative Max Over Production Limit for WYs 2021-2023 ⁶	Total Pumping in WY 2021	WY 2021 Pumping was Metered or Estimated ⁷	% of WY 2021 Annual Allocation Pumped	Carryover Pumped in WY 2021 ⁸	Over-Production in WY 2021 ⁸	Pumping Allocation Eligible for Carryover ⁹	Carryover Election by Party	WY 2021 Adjusted Pumping Calculation
	(a)	(b)	(c) = (a) + (b)	For BPA Parties: (d) = 0.95 x (c) For other Parties: (d) = (c)	(e)	(f) = 2 x (c)	(g)	(h) = (d)+(e)+(g)	(i) = 20% of Annual Allocation in WYs 21, 22, 23	(j)	(k)	(l) = (j)/(d)	(m) ⁸	(n) = (j) - (h)	(o) ⁹	(p)	(q) = (j)-(g)-(m)+(p)
BPA Parties																	
BPA Party Subtotal	24,293		24,293	23,080.00	0.00	48,586.00		23,080.00	13,118.22	14,283.69		62%	0.00	103.18	8,758.09	7,626.68	21,910.37
Agri-Empire	574	0	574	545.00	0	1,148	0.00	545.00	309.96	0.00	na	0%	0.00	0.00	545.00	0.00	0.00
Rick and Joan Anson, co-trustees of the Anson Family Trust 08-18-08	2	0	2	2.00	0	4	0.00	2.00	1.08	0.00	na	0%	0.00	0.00	2.00	0.00	0.00
Alan & Tracy Asche	5	0	5	5.00	0	10	0.00	5.00	2.70	0.85	Estimated (P)	17%	0.00	0.00	4.15	4.15	5.00
Gary D. & Darlis A. Bailey	7	0	7	7.00	0	14	0.00	7.00	3.78	4.26	Estimated	61%	0.00	0.00	2.74	2.74	7.00
David and Juli Bauer, co-trustees of the D&J Bauer Family Trust 11-18-04	1,826	0	1,826	1,735.00	0	3,652	0.00	1,735.00	986.04	1,516.62	Metered	87%	0.00	0.00	218.38	218.38	1,735.00
William M. Bauer	670	0	670	637.00	0	1,340	0.00	637.00	361.80	372.96	Estimated (P)	105%	0.00	0.00	264.04	264.04	637.00
Borrego Air Ranch Mutual Water & Improvement Co.	12	0	12	11.00	0	24	0.00	11.00	6.48	9.42	Metered	86%	0.00	0.00	1.58	1.58	11.00
Borrego Nazareth LLC	1,462	0	1,462	1,389.00	0	2,924	0.00	1,389.00	789.48	58.35	Metered	4%	0.00	0.00	1,330.65	1,330.65	1,389.00
Borrego Water District	2,581	0	2,581	2,452.00	0	5,162	0.00	2,452.00	1,393.74	1,528.84	Metered	62%	0.00	0.00	923.16	923.16	2,452.00
Carpenter Family Trust 12-11-07	6	0	6	6.00	0	12	0.00	6.00	3.24	4.33	Estimated	72%	0.00	0.00	1.67	1.67	6.00
Conzelman/Jensen/Sommerville Family Trusts	4,741	0	4,741	4,504.00	0	9,482	0.00	4,504.00	2,560.14	3,953.81	Metered	88%	0.00	0.00	550.19	550.19	4,504.00
Desert Farm LLC	21	0	21	20.00	0	42	0.00	20.00	11.34	26.90	Estimated	135%	0.00	6.90	0.00	0.00	26.90
Crumrine Family Trust 04-19-06	22	0	22	21.00	0	44	0.00	21.00	11.88	19.59	Metered	93%	0.00	0.00	1.41	1.41	21.00
CWC Casa Del Zorro LLC	957	0	957	909.00	0	1,914	0.00	909.00	516.78	828.58	Metered	91%	0.00	0.00	80.42	80.42	909.00
De Anza Desert Country Club	8	0	8	8.00	0	16	0.00	8.00	4.32	6.07	Estimated (P)	76%	0.00	0.00	1.93	1.93	8.00
John B. & Silvia H. Hogan	887	0	887	843.00	0	1,774	0.00	843.00	478.98	384.02	Estimated (P)	97%	0.00	0.00	458.98	25.98	410.00
John Doljanin	112	0	112	106.00	0	224	0.00	106.00	60.48	0.00	na	0%	0.00	0.00	106.00	0.00	0.00
Genus L.P.	1,613	0	1,613	1,532.00	0	3,226	0.00	1,532.00	871.02	923.33	Metered	60%	0.00	0.00	608.67	608.67	1,532.00
JM Roadrunner, LLC	2	0	2	2.00	0	4	0.00	2.00	1.08	0.00	na	0%	0.00	0.00	2.00	0.00	0.00
Robert Larkins	1	0	1	1.00	0	2	0.00	1.00	0.54	0.00	na	0%	0.00	0.00	1.00	1.00	1.00
Michael Malter & John Savittieri	103	0	103	98.00	0	206	0.00	98.00	55.62	161.64	Metered	165%	0.00	63.64	0.00	0.00	161.64
Gamini D. Weerasekera	14	0	14	13.00	0	28	0.00	13.00	7.56	13.58	Estimated	104%	0.00	0.58	0.00	0.00	13.58
Manuel & Araceli C. Navarro	18	-18	0	0.00	na	0	na	na	9.72	na	na	na	na	0.00	na	na	na
Monica Real Estate Holdings, LP	1	0	1	1.00	0	2	0.00	1.00	0.54	0.00	na	0%	0.00	0.00	1.00	0.00	0.00
Doug & Patricia Munson	114	0	114	108.00	0	228	0.00	108.00	61.56	84.36	Estimated	78%	0.00	0.00	23.64	0.00	84.36
Ronald Pecoff	520	0	520	494.00	0	1,040	0.00	494.00	280.80	386.28	Metered	78%	0.00	0.00	107.72	107.75	494.03
The Roadrunner Club at Borrego, LP	12	0	12	11.00	0	24	0.00	11.00	6.48	0.00	na	0%	0.00	0.00	11.00	0.00	0.00
RTA Borrego, LLC	4	0	4	4.00	0	8	0.00	4.00	2.16	1.20	Estimated	30%	0.00	0.00	2.80	0.00	1.20
Jose G. & Maria E. Sanchez	2,226	0	2,226	2,115.00	0	4,452	0.00	2,115.00	1,202.04	1,569.44	Metered	74%	0.00	0.00	545.56	545.56	2,115.00
Seley Ranches, L.P.	61	0	61	58.00	0	122	0.00	58.00	32.94	90.06	Metered	155%	0.00	32.06	0.00	0.00	90.06
Shenandoah Growers, Inc.	2	0	2	2.00	0	4	0.00	2.00	1.08	0.00	na	0%	0.00	0.00	2.00	0.00	0.00
Max Siefker	3	0	3	3.00	0	6	0.00	3.00	1.62	0.00	na	0%	0.00	0.00	3.00	0.00	0.00
Brian Siefker Trust 12-18-01	32	0	32	30.00	0	64	0.00	30.00	17.28	0.00	na	0%	0.00	0.00	30.00	30.00	30.00
Smith Kent R. Revocable Living Trust 01-04-90	287	0	287	273.00	0	574	0.00	273.00	154.98	248.40	Metered	91%	0.00	0.00	24.60	24.60	273.00
The Springs RV and Golf Resort, LP	965	0	965	917.00	0	1,930	0.00	917.00	521.10	0.00	na	0%	0.00	0.00	917.00	917.00	917.00
T2 Borrego, LLC	2,518	18	2,536	2,409.00	0	5,072	0.00	2,409.00	1,359.72	796.23	Metered	33%	0.00	0.00	1,612.77	1,612.77	2,409.00
T2 Borrego, LLC - Ram's Hill	485	0	485	461.00	0	970	0.00	461.00	261.90	367.55	Metered	80%	0.00	0.00	93.45	93.45	461.00
T2 Farms LLC	1,142	0	1,142	1,085.00	0	2,284	0.00	1,085.00	616.68	892.73	Metered	82%	0.00	0.00	192.27	192.27	1,085.00
Bagdasarian Farms, LLC	36	0	36	34.00	0	72	0.00	34.00	19.44	0.00	na	0%	0.00	0.00	34.00	34.00	34.00
Joel Vanasdlen	82	0	82	78.00	0	164	0.00	78.00	44.28	25.69	Metered	33%	0.00	0.00	52.31	52.31	78.00
Michael C. Ward, Sr. Revocable Trust 10-05-17	1	0	1	1.00	0	2	0.00	1.00	0.54	0.00	na	0%	0.00	0.00	1.00	1.00	1.00
Wisdom Gabriel B & Weiss-Wisdom Diana Family 2008 Trust 08-01-08	158	0	158	150.00	0	316	0.00	150.00	85.32	8.60	Estimated	106%	0.00	0.00	0.00	0.00	8.60
Wright Family Living Trust 06-19-89 (now Steven L. Phillips Separate Property Trust)																	
Parties with Other Non-De Minimis Water Rights																	
Other Party Subtotal	42		42	42.00	na	na		42.00	22.68	54.76		130%	na	22.66	na	na	54.76
Borrego Springs Unified School District	22	na	22	22.00	na	na	0.00	22.00	11.88	44.66	Metered	203%	na	22.66	na	na	44.66
Anza Borrego Desert State Park	20	na	20	20.00	na	na	0.00	20.00	10.80	10.10	Metered	51%	na	0.00	na	na	10.10
TOTALS	24,335		24,335	23,122	0	48,586	0	23,122	13,140.90	14,338.45		62%	0	125.84	8,758.09	7,626.68	21,965.13

(1) The Judgment establishes separate, non-BPA pumping rights for two entities—the Anza Borrego Desert State Park (ABDSP) and the Borrego Springs Unified School District (BSUSD)—that are not subject to pumping Rampdown, Carryover, or transfer provisions, but are subject to all other substantive provisions of the Judgment, including paying pumping assessments based on pumping.

(2) A negative value indicates BPA rights transferred to another Party. A positive value indicates BPA rights transferred from another Party. Non-BPA rights cannot be transferred.

(3) The Annual Allocation in each WY is determined by multiplying the Party's BPA by the Pumping Percentage in effect for that WY, based on the pumping Rampdown percentage then in effect. For example, in WY 2021 the Pumping Percentage is 95 percent, which is a 5 percent pumping rampdown from BPA. Annual Allocation is rounded to the nearest whole af. The subtotal is the sum of each Party's rounded Annual Allocation value.

(4) The rampdown applies only to BPA Parties. For BPA Parties the WY 2021 pumping allocation is 95% of BPA, rounded to the nearest whole number. For BSUSD and ABDSP, the rights are not subject to rampdown and annual allocation is always equal to the pumping right defined in the Judgment.

(5) All BPA Parties have a zero Carryover account balance in WY 2021. The maximum Carryover balance is two times the BPA (2 x BPA). Carryover only applies to BPA rights; non-BPA rights are not eligible for Carryover.

(6) The Judgment provides that in the first three years of operation, a Party can pump in excess of its Annual Allocation without incurring an immediate Overproduction penalty, so long as the total cumulative Overproduction in those three years does not exceed the cumulative Maximum Overproduction Limit for the three-year period. Parties have until September 30, 2025 to remedy Overproduction in WYs 2021 through 2023. If a Party produces in excess of the three-year cumulative Maximum Overproduction Limit, then the Overproduction over the maximum limit is subject to Overproduction assessments if not remedied by September 30, 2022. For each Pumper, the Maximum Overproduction Limit for WYs 2021 to 2023 is calculated as follows: (20% x WY 2021 Annual Allocation) + (20% x WY 2022 Annual Allocation) + (20% x WY 2023 Annual Allocation). The WY 2022 Annual Allocation is based on a 10 percent Rampdown Rate (e.g. Pumping Percentage of 90 percent). The WY 2022 Annual Allocation is based on a 15 percent Rampdown Rate (e.g. Pumping Percentage of 85 percent). "na" is entered if Party did not have Overproduction.

(7) Not all parties were metered by October 1, 2020. "Estimated (P)" values were estimated for parties with partial year metered data (the available data was used to estimate pumping for the WY based on the data available).

"Estimated" values are for Parties with no meter data available in which case the pumping was estimated based on the method used in the GMP. "na" values represent parties who are not actively pumping and have no operable wells.

(8) If j > e then m = e; if j < e, then m = j. The first water pumped each year is Carryover, thus there was no Carryover Pumping in WY 2021 because the Carryover Balance was 0.

(9) If a Party has no Overproduction, (o) = (d) - (j) + (g) + (m)

WY 2021 ACCOUNTING AMENDMENTS

* William M. Bauer pumping amended in based on detailed meter data was provided in WY 2022 to reasonably re-estimate pumping for WY 2021. Due to the over-estimation of pumping for WY 2021, the Party over-paid assessments in WY 2022. The Party chose to use the overpayment credit to elect the eligible Carryover that would have been available from WY 2021 had pumping been correctly estimated at the time.

* John Doljanin pumping amended in based on detailed meter data was provided in WY 2022 to reasonably re-estimate pumping for WY 2021. Due to the over-estimation of pumping for WY 2021, the Party over-paid assessments in WY 2022. The Party chose to use the overpayment credit to elect the eligible Carryover that would have been available from WY 2021 had pumping been correctly estimated at the time.

* Steven L. Phillips Separate Property Trust (former Wright Trust) pumping amended in based on detailed property use information provided in WY 2024 to reasonably re-estimate pumping for WY 2021. Due to the over-estimation of pumping for WY 2021, the Party over-paid assessments in WY 2022. The Party was reissued invoices based on the corrected estimated pumping.

F-2. AMENDED WY 2022 Water Rights Accounting Summary for the Borrego Springs Subbasin - (all values in acre-feet) - amended values highlighted in yellow with red text

	BPA or Other Non-De Minimis Rights as of Sep 30, 2021 ¹	Permanent Transfer of BPA ^{1,2} effective in WY 2022	BPA or Other Non-De Minimis Rights as of Oct 1, 2022	Maximum Allowable Carryover Account Balance ^{3,1}	Carryover Account Balance as of Oct 1, 2021 ^{3,1}	Cumulative Max Over-production Limit for WYs 2021-2023 ⁴	Balance of Over-production as of Oct 1, 2021 ⁵	Portion of Over-production Balance to Resolve Effective Sept 30, 2022 ⁶	Portion of Overproduction Balance to Resolve Effective Sept 30, 2025 ⁶	WY 2022 Annual Allocation per Rampdown: 90% of BPA ⁷ ; 100% of non-BPA rights ^{8,1}	Leased or Transferred Annual Allocation Effective in WY 2022 ^{2,1}	Leased or Transferred Carryover Effective in WY 2022 ^{2,1}	Total Allowable Pumping for WY 2022 ⁹	Total Pumping in WY 2022	WY 2022 Pumping was Metered or Estimated ¹⁰	Carryover Pumped in WY 2022 ^{11,1}	Balance of Over-production as of September 30, 2022	Balance of Over-production to Resolve by Sept 30, 2023 ¹³	Balance of Over-production to Resolve by Sept 30, 2025 ¹³	Pumping Allocation Eligible for Carryover ¹⁴	Carryover Election by Party	Carryover Account Balance as of October 1, 2022	WY 2022 Adjusted Pumping Calculation
BPA Party or Party with Other Non-De Minimis Water Rights	(a)	(b)	(c) = (a) + (b)	(d) = 2 x (c)	(e)	(f) = 20% of Annual Allocation in WYs 21, 22, 23	(g)	(h): if (g) > (f), then (h) = (g) - (f), otherwise (h) = 0	(i) = (g) - (h)	For BPA Parties: (j) = 0.90 x (c) For other Parties: (d) = (c)	(k)	(l)	(m) = (e) + (j) + (k) + (l) - (g)	(n)	(o)	(p) ¹¹	(q) ¹²	(r): if (q) > (f), then (r) = (q) - (f), otherwise (r) = 0	(s) = (q) - (r)	(t) ¹⁴	(u)	(v) = (e)+(l)-(p)+(u)	(w) = (n)-(k)-(p)+(u)
TOTALS	24,335	0	24,335	48,586	7,626.68	13,145.20	125.84	17.30	108.54	21,908.00	0.00	0.00	29,408.84	12,908.62		4,426.85	114.68	26.61	88.07	13,297.65	11,352.21	14,552.04	19,833.98
BPA Parties																							
BPA Party Subtotal	24,293	0	24,293	48,586	7,626.68	13,120.00	103.18	7.84	95.34	21,866.00	0.00	-22.66	29,366.84	12,851.87		4,404.19	95.13	20.26	74.87	13,297.65	11,352.21	14,552.04	19,799.89
Agri-Empire	574	0	574	1,148	0.00	310.00	0.00	0.00	0.00	517.00	0.00	0.00	517.00	0.00	Metered	0.00	0.00	0.00	0.00	517.00	0.00	0.00	0.00
Rick and Joan Anson, co-trustees of the Anson Family Trust 08-1 8-08	2	0	2	4	0.00	1.20	0.00	0.00	0.00	2.00	0.00	0.00	2.00	0.00	na	0.00	0.00	0.00	0.00	2.00	0.00	0.00	0.00
Alan & Tracy Asche	5	0	5	10	4.15	2.80	0.00	0.00	0.00	5.00	0.00	0.00	9.15	0.80	Metered	0.80	0.00	0.00	0.00	5.00	5.00	8.35	5.00
Gary D. & Darlis A. Bailey	7	0	7	14	2.74	3.80	0.00	0.00	0.00	6.00	0.00	0.00	8.74	4.26	Estimated	2.74	0.00	0.00	0.00	4.48	4.48	4.48	6.00
David and Juli Bauer, co-trustees of the D&J Bauer Family Trust 11-18-04	1,826	0	1,826	3,652	218.38	986.00	0.00	0.00	0.00	1,643.00	0.00	0.00	1,861.38	1,089.24	Metered	218.38	0.00	0.00	0.00	772.14	772.14	772.14	1,643.00
William M. Bauer (A)	670	0	670	1,340	264.04	362.00	0.00	0.00	0.00	603.00	0.00	0.00	867.04	372.96	Estimated (P)	264.04	0.00	0.00	0.00	494.08	494.08	494.08	603.00
Borrego Air Ranch Mutual Water & Improvement Co.	12	0	12	24	1.58	6.40	0.00	0.00	0.00	11.00	0.00	0.00	12.58	6.45	Metered	1.58	0.00	0.00	0.00	6.13	6.13	6.13	11.00
Borrego Nazareth LLC	1,462	0	1,462	2,924	1,330.65	789.60	0.00	0.00	0.00	1,316.00	0.00	0.00	2,646.65	62.99	Metered	62.99	0.00	0.00	0.00	1,316.00	63.00	1,330.66	63.00
Borrego Water District	2,581	-18	2,563	5,126	923.16	1,384.20	0.00	0.00	0.00	2,307.00	0.00	0.00	3,230.16	1,545.46	Metered	923.16	0.00	0.00	0.00	1,684.70	1,684.70	1,684.70	2,307.00
Carpenter Family Trust 12-11-07	6	0	6	12	1.67	3.20	0.00	0.00	0.00	5.00	0.00	0.00	6.67	2.69	Estimated (P)	1.67	0.00	0.00	0.00	3.98	3.98	3.98	5.00
Conzelman/Jensen/Sommerville Family Trusts	4,741	0	4,741	9,482	550.19	2,560.20	0.00	0.00	0.00	4,267.00	0.00	0.00	4,817.19	3,343.80	Metered	550.19	0.00	0.00	0.00	1,473.39	1,473.39	1,473.39	4,267.00
Desert Farm LLC, Crumrine Family Trust 04-19-06	21	0	21	42	0.00	11.40	6.90	0.00	6.90	19.00	0.00	0.00	12.10	12.64	Metered	0.00	0.54	0.00	0.54	0.00	0.00	0.00	12.64
CWC Casa Del Zorro LLC	22	0	22	44	1.41	12.00	0.00	0.00	0.00	20.00	0.00	0.00	21.41	32.22	Metered	1.41	10.81	0.00	10.81	0.00	0.00	0.00	30.81
De Anza Desert Country Club	957	0	957	1,914	80.42	516.60	0.00	0.00	0.00	861.00	0.00	0.00	941.42	814.81	Metered	80.42	0.00	0.00	0.00	126.61	126.61	126.61	861.00
John B. & Silvia H. Hogan	8	0	8	16	1.93	4.40	0.00	0.00	0.00	7.00	0.00	0.00	8.93	5.30	Metered	1.93	0.00	0.00	0.00	3.63	3.63	3.63	7.00
John Doljanin (A)	887	0	887	1,774	25.98	479.00	0.00	0.00	0.00	798.00	0.00	0.00	823.98	352.10	Estimated (P)	25.98	0.00	0.00	0.00	471.88	471.88	471.88	798.00
Genus L.P.	112	0	112	224	0.00	60.40	0.00	0.00	0.00	101.00	0.00	0.00	101.00	0.00	na	0.00	0.00	0.00	0.00	101.00	0.00	0.00	0.00
JM Roadrunner, LLC	1,613	-18.13	1,594.87	3,190	608.67	861.20	0.00	0.00	0.00	1,435.00	0.00	0.00	2,043.67	694.72	Metered	608.67	0.00	0.00	0.00	1,348.95	1,348.95	1,348.95	1,435.00
Robert Larkins	2	0	2	4	0.00	1.20	0.00	0.00	0.00	2.00	0.00	0.00	2.00	0.00	na	0.00	0.00	0.00	0.00	2.00	0.00	0.00	0.00
Michael Maiter & John Savittieri	1	0	1	2	1.00	0.60	0.00	0.00	0.00	1.00	0.00	0.00	2.00	0.00	na	0.00	0.00	0.00	0.00	1.00	1.00	2.00	1.00
Gamini D. Weerasekera	103	0	103	206	0.00	55.80	63.64	7.84	55.80	93.00	0.00	50.00	79.36	155.42	Metered	50.00	76.06	20.26	55.80	0.00	0.00	0.00	105.42
Manuel & Araceli C. Navarro	14	0	14	28	0.00	7.60	0.58	0.00	0.58	13.00	0.00	0.00	12.42	13.58	Estimated	0.00	1.16	0.00	1.16	0.00	0.00	0.00	13.58
Doug & Patricia Munson	1	0	1	2	0.00	0.60	0.00	0.00	0.00	1.00	0.00	0.00	1.00	0.00	na	0.00	0.00	0.00	0.00	1.00	0.00	0.00	0.00
Ronald Pecoff	114	0	114	228	0.00	61.60	0.00	0.00	0.00	103.00	0.00	0.00	103.00	84.36	Estimated	0.00	0.00	0.00	0.00	18.64	0.00	0.00	84.36
The Roadrunner Club at Borrego, LP	520	0	520	1,040	107.75	280.80	0.00	0.00	0.00	468.00	-100.00	0.00	475.75	375.02	Metered	107.75	0.00	0.00	0.00	100.73	100.73	100.73	468.00
RTA Borrego, LLC	12	0	12	24	0.00	6.40	0.00	0.00	0.00	11.00	0.00	0.00	11.00	0.00	na	0.00	0.00	0.00	0.00	11.00	0.00	0.00	0.00
Jose G. & Maria E. Sanchez	4	0	4	8	0.00	2.20	0.00	0.00	0.00	4.00	0.00	0.00	4.00	1.20	Estimated	0.00	0.00	0.00	0.00	2.80	0.00	0.00	1.20
Seley Ranches, L.P.	2,226	0	2,226	4,452	545.56	1,202.00	0.00	0.00	0.00	2,003.00	0.00	0.00	2,548.56	1,651.72	Metered	545.56	0.00	0.00	0.00	896.84	896.84	896.84	2,003.00

F-2. AMENDED WY 2022 Water Rights Accounting Summary for the Borrego Springs Subbasin - (all values in acre-feet) - amended values highlighted in yellow with red text

BPA Party or Party with Other Non-De Minimis Water Rights	BPA or Other Non-De Minimis Rights as of Sep 30, 2021 ¹	Permanent Transfer of BPA ^{1,2} effective in WY 2022	BPA or Other Non-De Minimis Rights as of Oct 1, 2022	Maximum Allowable Carryover Account Balance ^{3,1}	Carryover Account Balance as of Oct 1, 2021 ^{3,1}	Cumulative Max Over-production Limit for WYs 2021-2023 ⁴	Balance of Over-production as of Oct 1, 2021 ⁵	Portion of Over-production Balance to Resolve Effective Sept 30, 2022 ⁶	Portion of Overproduction Balance to Resolve Effective Sept 30, 2025 ⁶	WY 2022 Annual Allocation per Rampdown: 90% of BPA ⁷ ; 100% of non-BPA rights ^{8,1}	Leased or Transferred Annual Allocation Effective in WY 2022 ^{2,1}	Leased or Transferred Carryover Effective in WY 2022 ^{2,1}	Total Allowable Pumping for WY 2022 ⁹	Total Pumping in WY 2022	WY 2022 Pumping was Metered or Estimated ¹⁰	Carryover Pumped in WY 2022 ^{11,1}	Balance of Over-production as of September 30, 2022	Balance of Over-production to Resolve by Sept 30, 2023 ¹³	Balance of Over-production to Resolve by Sept 30, 2025 ¹³	Pumping Allocation Eligible for Carryover ¹⁴	Carryover Election by Party	Carryover Account Balance as of October 1, 2022	WY 2022 Adjusted Pumping Calculation
	(a)	(b)	(c) = (a) + (b)	(d) = 2 x (c)	(e)	(f) = 20% of Annual Allocation in WYs 21, 22, 23	(g)	(h): if (g) > (f), then (h) = (g) - (f), otherwise (h) = 0	(i) = (g) - (h)	For BPA Parties: (j) = 0.90 x (c) For other Parties: (d) = (c)	(k)	(l)	(m) = (e) + (j) + (k) + (l) - (g)	(n)	(o)	(p) ¹¹	(q) ¹²	(r): if (q) > (f), then (r) = (q) - (f), otherwise (r) = 0	(s) = (q) - (r)	(t) ¹⁴	(u)	(v) = (e)+(l)-(p)+(u)	(w) = (n)-(k)-(p)+(u)
Soli Organic Inc.	61	0	61	122	0.00	33.00	32.06	0.00	32.06	55.00	0.00	50.00	72.94	79.50	Metered	50.00	6.56	0.00	6.56	0.00	0.00	0.00	29.50
Max Siefker	2	0	2	4	0.00	1.20	0.00	0.00	0.00	2.00	0.00	0.00	2.00	0.00	na	0.00	0.00	0.00	0.00	2.00	0.00	0.00	0.00
Brian Siefker Trust 12-18-01	3	0	3	6	0.00	1.80	0.00	0.00	0.00	3.00	0.00	0.00	3.00	0.00	na	0.00	0.00	0.00	0.00	3.00	0.00	0.00	0.00
Smith Kent R. Revocable Living Trust 01-04-90	32	18	50	100	30.00	27.20	0.00	0.00	0.00	45.00	0.00	0.00	75.00	0.00	na	0.00	0.00	0.00	0.00	45.00	45.00	75.00	45.00
The Springs RV and Golf Resort, LP	287	0	287	574	24.60	155.00	0.00	0.00	0.00	258.00	100.00	0.00	382.60	288.52	Metered	24.60	0.00	0.00	0.00	94.08	94.08	94.08	258.00
T2 Borrego, LLC	965	0	965	1,930	917.00	521.20	0.00	0.00	0.00	869.00	0.00	-122.66	1,663.34	0.00	na	0.00	0.00	0.00	0.00	869.00	869.00	1,663.34	869.00
T2 Borrego, LLC - Ram's Hill	2,536	0	2,536	5,072	1,612.77	1,369.40	0.00	0.00	0.00	2,282.00	0.00	0.00	3,894.77	590.06	Metered	590.06	0.00	0.00	0.00	2,282.00	2,282.00	3,304.71	2,282.00
T2 Farms LLC	485	0	485	970	93.45	262.00	0.00	0.00	0.00	437.00	0.00	0.00	530.45	257.04	Metered	93.45	0.00	0.00	0.00	273.41	273.41	273.41	437.00
Bagdasarian Farms, LLC	1,142	0	1,142	2,284	192.27	616.80	0.00	0.00	0.00	1,028.00	0.00	0.00	1,220.27	976.19	Metered	192.27	0.00	0.00	0.00	244.08	244.08	244.08	1,028.00
Joel Vanasden	36	0	36	72	34.00	19.40	0.00	0.00	0.00	32.00	0.00	0.00	66.00	0.00	na	0.00	0.00	0.00	0.00	32.00	0.00	34.00	0.00
Michael C. Ward, Sr. Revocable Trust 10-05-17	82	0	82	164	52.31	44.40	0.00	0.00	0.00	74.00	0.00	0.00	126.31	6.54	Metered	6.54	0.00	0.00	0.00	74.00	74.00	119.77	74.00
Wisdom Gabriel B & Weiss-Wisdom Diana Family 2008 Trust 08-01-08	1	0	1	2	1.00	0.60	0.00	0.00	0.00	1.00	0.00	0.00	2.00	0.00	na	0.00	0.00	0.00	0.00	1.00	1.00	2.00	1.00
Wright Family Living Trust 06-19-89 (now Steven L. Phillips Separate Property Trust)	158	0	158	316	0.00	85.20	0.00	0.00	0.00	142.00	0.00	0.00	142.00	29.38	Estimated	0.00	0.00	0.00	0.00	0.00	0.00	0.00	29.38
Ashley Bilyk and Lee Tyler Bilyk	0	18.13	18.13	36	0.00	9.60	0.00	0.00	0.00	16.00	0.00	0.00	16.00	2.90	Metered	0.00	0.00	0.00	0.00	13.10	13.10	13.10	16.00
Parties with Other Non-De Minimis Water Rights																							
Other Party Subtotal	42	0	42	na	na	25.20	22.66	9.46	13.20	42.00	0.00	22.66	42.00	56.75		22.66	19.55	6.35	13.20	na	na	34.09	
Borrego Springs Unified School District	22	na	22	na	na	13.20	22.66	9.46	13.20	22.00	0.00	22.66	22.00	41.55	Metered	22.66	19.55	6.35	13.20	0.00	na	na	18.89
Anza Borrego Desert State Park	20	na	20	na	na	12.00	0.00	0.00	0.00	20.00	0.00	0.00	20.00	15.20	Metered	0.00	0.00	0.00	0.00	0.00	na	na	15.20

(1) The Judgment establishes separate, non-BPA pumping rights for two entities—the Anza Borrego Desert State Park (ABDSP) and the Borrego Springs Unified School District (BSUSD) — that are not subject to pumping Rampdown, Carryover, or transfer provisions, but are subject to all other substantive provisions of the Judgment, including paying pumping assessments based on annual pumping.

(2) A negative transfer value indicates rights transferred to another Party. A positive value indicates rights transferred from another Party. Non-BPA rights cannot be transferred. Parties with Other Non-De Minimis Water Rights may transfer annual allocation or Carryover to resolve Overproduction (see note numbers 4, 5, and 6 below). The total across all Parties will always be 0.

(3) Carryover only applies to BPA rights; non-BPA rights are not eligible for Carryover. The maximum Carryover balance is two times the BPA (= 2 x BPA). Balance as of October 1, 2022 is based on the final WY 2021 water rights accounting, unless adjustments have been made and documented since publishing the prior year accounting.

(4) The Judgment provides that in the first three years of operation, a Party can pump in excess of its Annual Allocation without incurring an immediate Overproduction penalty, so long as the total cumulative Overproduction in those three years does not exceed the cumulative Maximum Overproduction Limit for the three-year period. Parties have until September 30, 2025 to remedy Overproduction in WYs 2021 through 2023. If a Party produces in excess of the three-year cumulative Maximum Overproduction Limit, then the Overproduction over the maximum limit is subject to Overproduction assessments if not remedied by (effective as of) September 30, 2022. For each Pumper, the Maximum Overproduction Limit for WYs 2021 to 2023 is calculated as follows: = (20% x WY 2021 Annual Allocation) + (20% x WY 2022 Annual Allocation) + (20% x WY 2023 Annual Allocation). The WY 2021, 2022, and 2023 Annual Allocations are based on a 5 percent, 10 percent, and 15 percent Rampdown Rate, respectively (e.g. Pumping Percentage of 95, 90, and 85 percent).

(5) The balance of Overproduction as of October 1, 2022 is based on the final WY 2021 water rights accounting, unless adjustments have been made and documented since publishing the prior year accounting. Overproduction can be remedied through under-pumping of the Annual Allocation or transfers and leases of BPA/Annual Allocation/Carryover.

(6) The amount of Overproduction that exceeds the Cumulative Maximum Overproduction Limit in column (f) must be resolved effective September 30, 2022 to avoid an Overproduction penalty assessment in the amount of \$500 per acre-foot of Overproduction: if (g) > (f), then (h) = (g) - (f), otherwise (h) = 0. The remaining balance of Overproduction does not need to be resolved until September 30, 2025.

(7) The Annual Allocation in each WY is determined by multiplying the Party's BPA by the Pumping Percentage in effect for that WY, based on the pumping Rampdown percentage then in effect pursuant to the Judgment. For example, in WY 2022 the Pumping Percentage is 90 percent, which is a 10 percent pumping rampdown from BPA. Annual Allocation is rounded to the nearest whole af. The subtotal and totals across all Parties is the sum of each Party's rounded Annual Allocation value.

(8) The rampdown applies only to BPA Parties. For BPA Parties the WY 2021 pumping allocation is 95% of BPA, rounded to the nearest whole number. For BSUSD and ABDSP, the rights are not subject to rampdown and annual allocation is always equal to the pumping right defined in the Judgment.

(9) The total allowable pumping for the Water Year is the sum of the Carryover account balance (e) plus the Annual Allocation (j) plus any leased/transferred Allocation or Carryover less the total balance of Overproduction (g). Allowable (m) = (e) + (j) + (k) + (l) - (g)

(10) Not all parties were metered by October 1, 2021. "Estimated (P)" values were estimated for parties with partial year metered data (the available data was used to estimate pumping for the WY based on the data available). "Estimated" values are for Parties with no meter data available in which case the pumping was estimated based on the method used in the GMP. "na" values represent parties who are not actively pumping and have no operable wells.

(11) Pursuant to Judgment Section III.G.1 "The first Groundwater produced by a Party during any Water Year will be deemed to be an exercise of any Carryover." If (e) > 0, then (p) = minimum of [(e)+(j)] or (n)

(12) (q) = IF (n) > (e) + (j) + (k) + (l) - (g), then (n) - [(e) + (j) + (k) + (l) - (g)], otherwise 0

(13) The amount of Overproduction that exceeds the Cumulative Maximum Overproduction Limit in column (f) must be resolved effective September 30, 2023 to avoid an Overproduction penalty assessment in WY 2024. The rate is to be determined. If (q) > (f), then (r) = (q) - (f), otherwise (r) = 0. The remaining balance of Overproduction does not need to be resolved until September 30, 2025.

(14) If the Party has no Overproduction balance, then the eligible Carryover (t) = (j) + (k) - [(n) - (p)]. No Party is up against a Carryover Account Balance limit in WY 2022.

Other Notes:
 (A) The WY 2021 accounting for this Party had to be updated to account for over-estimation of WY 2021 pumping. Sufficiently detailed meter data was provided in WY 2022 to reasonably re-estimate pumping for WY 2021. Due to the over-estimation of pumping for WY 2021, the Parties over-paid assessments in WY 2022. The Parties chose to use the overpayment credit to elect the eligible Carryover that would have been available from WY 2021 had pumping been correctly estimated at the time. The other option given to the Parties was to receive a credit against the WY 2023 pumping assessment.

WY 2022 ACCOUNTING AMENDMENTS

* Steven L. Phillips Separate Property Trust (former Wright Trust) pumping amended in based on detailed property use information provided in WY 2024 to reasonably re-estimate pumping for WY 2022. Due to the over-estimation of pumping for WY 2021, the Party over-paid assessments in WY 2022. The Party was reissued invoices based on the corrected estimated pumping.

F-3. AMENDED WY 2023 Water Rights Accounting Summary for the Borrego Springs Subbasin - (all values in acre-feet) - amended values highlighted in yellow with red text

	BPA or Other Non-De Minimis Rights as of Sep 30, 2022 ¹	Permanent Transfer of BPA ^{1,2} effective in WY 2023	BPA or Other Non-De Minimis Rights as of Oct 1, 2023	Maximum Allowable Carryover Account Balance ^{3,1}	Carryover Account Balance as of Oct 1, 2022 ^{3,1}	Cumulative Max Over-production Limit for WYs 2021-2023 ⁴	Balance of Over-production as of Oct 1, 2022 ⁵	Portion of Over-production Balance to Resolve Effective Sept 30, 2023 ⁶	Portion of Overproduction Balance to Resolve Effective Sept 30, 2025 ⁶	WY 2023 Annual Allocation per Rampdown: 85% of BPA ⁷ ; 100% of non-BPA rights ^{8,1}	Leased or Transferred Annual Allocation Effective in WY 2023 ²	Leased or Transferred Carryover Effective in WY 2023 ²	Total Allowable Pumping for WY 2023 ⁹	Total Pumping in WY 2023	WY 2023 Pumping was Metered or Estimated ¹⁰	Carryover Pumped in WY 2023 ^{11,1}	Balance of Over-production as of September 30, 2023	Balance of Over-production to Resolve by Sept 30, 2024 ¹³	Balance of Over-production to Resolve by Sept 30, 2025 ¹³	Pumping Allocation Eligible for Carryover ¹⁴	Carryover Election by Party	Carryover Account Balance as of October 1, 2023	WY 2023 Adjusted Pumping Calculation
BPA Party or Party with Other Non-De Minimis Water Rights	(a)	(b)	(c) = (a) + (b)	(d) = 2 x (c)	(e)	(f) = 20% of Annual Allocation in WYs 21, 22, 23	(g)	(h): if (g) > (f), then (h) = (g) - (f), otherwise (h) = 0	(i) = (g) - (h)	For BPA Parties: (j) = 0.85 x (c) For other Parties: (d) = (c)	(k)	(l)	(m) = (e) + (j) + (k) + (l) - (g)	(n)	(o)	(p) ¹¹	(q) ¹²	(r): if (q) > (j), then (r) = (q) - (j), otherwise (r) = 0	(s) = (q) - (r)	(t) ¹⁴	(u)	(v) = (e)+(l)-(p)+(u)	(w) = (n)-(k)-(p)+(u)
TOTALS	24,335	0.00	24,335	48,586	14,552.04	13,145	114.68	26.61	88.07	20,694	0.00	0.00	35,131.36	10,275.86		7,003.82	143.73	44.20	99.53	16,779.58	13,794.38	21,323.06	17,072.62
BPA Parties																							
BPA Party Subtotal	24,293	0	24,293	48,586.00	14,552.04	13,119.80	95.13	20.26	74.87	20,652.00	0.00	-19.55	35,089.36	10,249.51		7,003.82	143.73	44.20	99.53	16,779.58	13,794.38	21,323.06	17,046.26
Agri-Empire	574	0	574	1,148	0.00	310.00	0.00	0.00	0.00	488.00	0.00	0.00	488.00	0.00	Metered	0.00	0.00	0.00	0.00	488.00	0.00	0.00	0.00
Rick and Joan Anson, co-trustees of the Anson Family Trust 08-1 8-08	2	0	2	4	0.00	1.20	0.00	0.00	0.00	2.00	0.00	0.00	2.00	0.00	na	0.00	0.00	0.00	0.00	2.00	0.00	0.00	0.00
Alan & Tracy Asche	5	0	5	10	8.35	2.80	0.00	0.00	0.00	4.00	0.00	0.00	12.35	1.33	Metered	1.33	0.00	0.00	0.00	2.98	2.98	10.00	2.98
Gary D. & Darlis A. Bailey	7	0	7	14	4.48	3.80	0.00	0.00	0.00	6.00	0.00	0.00	10.48	7.12	Metered	4.48	0.00	0.00	0.00	3.36	3.36	3.36	6.00
David and Juli Bauer, co-trustees of the D&J Bauer Family Trust 11-18-04	1,826	-415	1,411	2,822	772.14	761.80	0.00	0.00	0.00	1,199.00	0.00	0.00	1,971.14	913.32	Metered	772.14	0.00	0.00	0.00	1,057.82	700.00	700.00	841.18
BWD (Purchase from D & J Bauer and attached to APN 140-070-18) ^(A)	0	415	415	830	0.00	224.20	0.00	0.00	0.00	353.00	0.00	0.00	353.00	0.00	na	0.00	0.00	0.00	0.00	353.00	353.00	353.00	353.00
William M. Bauer ^(B)	670	-670	0	0	494.08	0.00	0.00	0.00	0.00	0.00	0.00	-458.98	35.10	35.10	Metered	35.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00
BWD (Purchase from W. Bauer and attached to APN140-010-08) ^{(B),(C)}	0	670	670	1,340	0.00	362.00	0.00	0.00	0.00	570.00	0.00	439.43	1,009.43	0.00	na	0.00	0.00	0.00	0.00	570.00	570.00	1,009.43	570.00
Borrego Air Ranch Mutual Water & Improvement Co.	12	0	12	24	6.13	6.40	0.00	0.00	0.00	10.00	0.00	0.00	16.13	6.85	Metered	6.13	0.00	0.00	0.00	9.28	9.28	9.28	10.00
Borrego Nazareth LLC	1,462	0	1,462	2,924	1,330.66	789.60	0.00	0.00	0.00	1,243.00	0.00	0.00	2,573.66	45.39	Estimated (P)	45.39	0.00	0.00	0.00	1,243.00	46.00	1,331.27	46.00
Borrego Water District	2,563	25.3	2,588.30	5,177	1,684.70	1,397.60	0.00	0.00	0.00	2,200.00	0.00	0.00	3,884.70	1,516.10	Metered	1,516.10	0.00	0.00	0.00	2,200.00	2,200.00	2,368.60	2,200.00
Carpenter Family Trust 12-11-07	6	0	6	12	3.98	3.20	0.00	0.00	0.00	5.00	0.00	0.00	8.98	7.94	Metered	3.98	0.00	0.00	0.00	1.04	1.04	1.04	5.00
Conzelman/Jensen/Sommerville Family Trusts	4,741	0	4,741	9,482	1,473.39	2,560.20	0.00	0.00	0.00	4,030.00	0.00	0.00	5,503.39	2,537.96	Metered	1,473.39	0.00	0.00	0.00	2,965.43	2,965.43	2,965.43	4,030.00
Desert Farm LLC, Crumrine Family Trust 04-19-06	21	0	21	42	0.00	11.40	0.54	0.00	0.54	18.00	0.00	0.00	17.46	13.94	Metered	0.00	0.00	0.00	0.00	4.06	4.06	4.06	18.00
CWC Casa Del Zorro LLC	22	0	22	44	0.00	12.00	10.81	0.00	10.81	19.00	0.00	0.00	8.19	27.76	Metered	0.00	19.57	7.57	12.00	0.00	0.00	0.00	27.76
De Anza Desert Country Club	957	0	957	1,914	126.61	516.60	0.00	0.00	0.00	813.00	0.00	0.00	939.61	508.28	Metered	126.61	0.00	0.00	0.00	431.33	431.33	431.33	813.00
John B. & Silvia H. Hogan	8	0	8	16	3.63	4.40	0.00	0.00	0.00	7.00	0.00	0.00	10.63	4.51	Metered	3.63	0.00	0.00	0.00	6.12	6.12	6.12	7.00
John Doljanin ^{(D),(E)}	887	-887	0	0	471.88	0.00	0.00	0.00	0.00	0.00	0.00	-309.46	162.42	162.42	Metered	162.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00
T2 Palms, LLC ^(D)	0	887	887	1,774	0.00	479.00	0.00	0.00	0.00	754.00	0.00	309.46	1,063.46	0.00	na	0.00	0.00	0.00	0.00	754.00	0.00	309.46	0.00
Genus L.P.	112	0	112	224	0.00	60.40	0.00	0.00	0.00	95.00	0.00	0.00	95.00	0.00	na	0.00	0.00	0.00	0.00	95.00	0.00	0.00	0.00
JM Roadrunner, LLC	1,594.87	0	1,594.87	3,190	1,348.95	861.20	0.00	0.00	0.00	1,356.00	0.00	0.00	2,704.95	776.75	Metered	776.75	0.00	0.00	0.00	1,356.00	1,356.00	1,928.20	1,356.00
Robert Larkins	2	0	2	4	0.00	1.20	0.00	0.00	0.00	2.00	0.00	0.00	2.00	0.00	na	0.00	0.00	0.00	0.00	ne	0.00	0.00	0.00
Michael Maiter & John Savittieri	1	0	1	2	2.00	0.60	0.00	0.00	0.00	1.00	0.00	0.00	3.00	0.00	na	0.00	0.00	0.00	0.00	0.00	0.00	2.00	0.00
Gamini D. Weerasekera	103	0	103	206	0.00	55.80	76.06	20.26	55.80	88.00	0.00	30.00	41.94	134.37	Metered	30.00	92.43	36.63	55.80	0.00	0.00	0.00	104.37
Manuel & Araceli C. Navarro	14	0	14	28	0.00	7.60	1.16	0.00	1.16	12.00	0.00	0.00	10.84	13.58	Estimated	0.00	2.74	0.00	2.74	ne	0.00	0.00	13.58
Doug & Patricia Munson	1	0	1	2	0.00	0.60	0.00	0.00	0.00	1.00	0.00	0.00	1.00	0.00	na	0.00	0.00	0.00	0.00	1.00	1.00	1.00	1.00
Ronald Pecoff	114	0	114	228	0.00	61.60	0.00	0.00	0.00	97.00	0.00	0.00	97.00	26.80	Metered	0.00	0.00	0.00	0.00	70.20	70.20	70.20	97.00
The Roadrunner Club at Borrego, LP	520	0	520	1,040	100.73	280.80	0.00	0.00	0.00	442.00	0.00	0.00	542.73	281.66	Metered	100.73	0.00	0.00	0.00	261.07	261.07	261.07	442.00
RTA Borrego, LLC	12	0	12	24	0.00	6.40	0.00	0.00	0.00	10.00	0.00	0.00	10.00	0.00	na	0.00	0.00	0.00	0.00	10.00	0.00	0.00	0.00

F-3. AMENDED WY 2023 Water Rights Accounting Summary for the Borrego Springs Subbasin - (all values in acre-feet) - amended values highlighted in yellow with red text

	BPA or Other Non-De Minimis Rights as of Sep 30, 2022 ¹	Permanent Transfer of BPA ^{1,2} effective in WY 2023	BPA or Other Non-De Minimis Rights as of Oct 1, 2023	Maximum Allowable Carryover Account Balance ^{3,1}	Carryover Account Balance as of Oct 1, 2022 ^{3,1}	Cumulative Max Over-production Limit for WYs 2021-2023 ⁴	Balance of Over-production as of Oct 1, 2022 ⁵	Portion of Over-production Balance to Resolve Effective Sept 30, 2023 ⁶	Portion of Overproduction Balance to Resolve Effective Sept 30, 2025 ⁶	WY 2023 Annual Allocation per Rampdown: 85% of BPA ⁷ ; 100% of non-BPA rights ^{8,1}	Leased or Transferred Annual Allocation Effective in WY 2023 ²	Leased or Transferred Carryover Effective in WY 2023 ²	Total Allowable Pumping for WY 2023 ⁹	Total Pumping in WY 2023	WY 2023 Pumping was Metered or Estimated ¹⁰	Carryover Pumped in WY 2023 ^{11,1}	Balance of Over-production as of September 30, 2023	Balance of Over-production to Resolve by Sept 30, 2024 ¹³	Balance of Over-production to Resolve by Sept 30, 2025 ¹³	Pumping Allocation Eligible for Carryover ¹⁴	Carryover Election by Party	Carryover Account Balance as of October 1, 2023	WY 2023 Adjusted Pumping Calculation
BPA Party or Party with Other Non-De Minimis Water Rights	(a)	(b)	(c) = (a) + (b)	(d) = 2 x (c)	(e)	(f) = 20% of Annual Allocation in WYs 21, 22, 23	(g)	(h): if (g) > (f), then (h) = (g) - (f), otherwise (h) = 0	(i) = (g) - (h)	For BPA Parties: (j) = 0.85 x (c) For other Parties: (d) = (c)	(k)	(l)	(m) = (e) + (j) + (k) + (l) - (g)	(n)	(o)	(p) ¹¹	(q) ¹²	(r): if (q) > (f), then (r) = (q) - (f), otherwise (r) = 0	(s) = (q) - (r)	(t) ¹⁴	(u)	(v) = (e)+(l)-(p)+(u)	(w) = (n)-(k)-(p)+(u)
Jose G. & Maria E. Sanchez	4	0	4	8	0.00	2.20	0.00	0.00	0.00	3.00	0.00	0.00	3.00	1.20	Estimated	0.00	0.00	0.00	0.00	ne	0.00	0.00	1.20
Seley Ranches, L.P.	2,226	0	2,226	4,452	896.84	1,202.00	0.00	0.00	0.00	1,892.00	0.00	0.00	2,788.84	1,247.92	Metered	896.84	0.00	0.00	0.00	1,540.92	1,540.92	1,540.92	1,892.00
Soli Organic Inc.	61	0	61	122	0.00	33.00	6.56	0.00	6.56	52.00	0.00	0.00	45.44	74.43	Metered	0.00	28.99	0.00	28.99	0.00	0.00	0.00	74.43
Max Siefker	2	0	2	4	0.00	1.20	0.00	0.00	0.00	2.00	0.00	0.00	2.00	0.00	na	0.00	0.00	0.00	0.00	ne	0.00	0.00	0.00
Brian Siefker Trust 12-18-01	3	0	3	6	0.00	1.80	0.00	0.00	0.00	3.00	0.00	0.00	3.00	0.00	na	0.00	0.00	0.00	0.00	ne	0.00	0.00	0.00
Smith Kent R. Revocable Living Trust 01-04-90	50	0	50	100	75.00	27.20	0.00	0.00	0.00	43.00	0.00	0.00	118.00	0.00	na	0.00	0.00	0.00	0.00	25.00	25.00	100.00	25.00
The Springs RV and Golf Resort, LP	287	-25.3	261.70	523	94.08	141.40	0.00	0.00	0.00	222.00	0.00	0.00	316.08	108.82	Metered	94.08	0.00	0.00	0.00	207.26	207.26	207.26	222.00
T2 Borrego, LLC	965	0	965	1,930	1,663.34	521.20	0.00	0.00	0.00	820.00	0.00	-30.00	2,453.34	0.00	na	0.00	0.00	0.00	0.00	296.66	296.66	1,930.00	296.66
T2 Borrego, LLC - Ram's Hill	2,536	0	2,536	5,072	3,304.71	1,369.40	0.00	0.00	0.00	2,156.00	0.00	0.00	5,460.71	464.66	Metered	464.66	0.00	0.00	0.00	2,156.00	2,156.00	4,996.05	2,156.00
T2 Farms LLC	485	0	485	970	273.41	262.00	0.00	0.00	0.00	412.00	0.00	0.00	685.41	237.95	Metered	237.95	0.00	0.00	0.00	412.00	412.00	447.46	412.00
Bagdasarian Farms, LLC	1,142	0	1,142	2,284	244.08	616.80	0.00	0.00	0.00	971.00	0.00	0.00	1,215.08	1,054.41	Metered	244.08	0.00	0.00	0.00	160.67	160.67	160.67	971.00
Joel Vanasden	36	0	36	72	34.00	19.40	0.00	0.00	0.00	31.00	0.00	0.00	65.00	0.00	na	0.00	0.00	0.00	0.00	31.00	0.00	34.00	0.00
Michael C. Ward, Sr. Revocable Trust 10-05-17	82	0	82	164	119.77	44.40	0.00	0.00	0.00	70.00	0.00	0.00	189.77	6.15	Metered	6.15	0.00	0.00	0.00	50.38	0.00	113.62	0.00
Wisdom Gabriel B & Weiss-Wisdom Diana Family 2008 Trust 08-01-08	1	0	1	2	2.00	0.60	0.00	0.00	0.00	1.00	0.00	0.00	3.00	0.00	na	0.00	0.00	0.00	0.00	0.00	0.00	2.00	0.00
Wright Family Living Trust 06-19-89 (now Steven L. Phillips Separate Property Trust)	158	0	158	316	0.00	85.20	0.00	0.00	0.00	134.00	0.00	0.00	134.00	30.91	Estimated	0.00	0.00	0.00	0.00	0.00	0.00	0.00	37.10
Ashley Bilyk and Lee Tyler Bilyk	18.13	0	18.13	36.26	13.10	9.60	0.00	0.00	0.00	15.00	0.00	0.00	28.10	1.88	Metered	1.88	0.00	0.00	0.00	15.00	15.00	26.22	15.00
Parties with Other Non-De Minimis Water Rights																							
Other Party Subtotal	42	0	42	na	na	25.20	19.55	6.35	13.20	42.00	0.00	19.55	42.00	26.35		0.00	0.00	0.00	0.00	na	na	na	26.35
Borrego Springs Unified School District ^(F)	22	na	22	na	na	13.20	19.55	6.35	13.20	22.00	0.00	19.55	22.00	17.56	Metered	0.00	0.00	0.00	0.00	na	na	na	17.56
Anza Borrego Desert State Park	20	na	20	na	na	12.00	0.00	0.00	0.00	20.00	0.00	0.00	20.00	8.79	Metered	0.00	0.00	0.00	0.00	na	na	na	8.79

(1) The Judgment establishes separate, non-BPA pumping rights for two entities—the Anza Borrego Desert State Park (ABDSP) and the Borrego Springs Unified School District (BSUSD). These non-BPA rights are not subject to pumping Rampdown, Carryover, or transfer (to other Parties), but are subject to all other substantive provisions of the Judgment, including paying pumping assessments based on annual pumping and the ability to purchase/lease Annual Allocation or Carryover to cover Overproduction.

(2) A negative transfer value indicates rights transferred to another Party. A positive value indicates rights transferred from another Party. Non-BPA rights cannot be transferred. Parties with Other Non-De Minimis Water Rights may receive a lease/transfer of annual allocation or Carryover to resolve Overproduction (see note numbers 4, 5, and 6 below). The sum of all transfers across all Parties will always be 0.

(3) Carryover only applies to BPA rights, non-BPA rights are not eligible for Carryover. The maximum Carryover balance is two times the BPA (= 2 x BPA). Balance as of October 1, 2023 is based on the final WY 2022 water rights accounting, unless adjustments have been made and documented since publishing the prior year accounting. One adjustment was made to the WY 2022 final Water Rights accounting – See note [C].

(4) The Judgment provides that in the first three years of operation, a Party can pump in excess of its Annual Allocation without incurring an immediate Overproduction penalty, so long as the total cumulative Overproduction in those three years does not exceed the cumulative Maximum Overproduction Limit for the three-year period. Parties have until September 30, 2025 to remedy Overproduction in WYs 2021 through 2023. If a Party produces in excess of the three-year cumulative Maximum Overproduction Limit, then the Overproduction amount over the maximum limit is subject to Overproduction assessments if not remedied by (effective as of) September 30, 2022. For each Pumper, the Maximum Overproduction Limit for WYs 2021 to 2023 is calculated as follows: = (20% x WY 2021 Annual Allocation) + (20% x WY 2022 Annual Allocation) + (20% x WY 2023 Annual Allocation). The WY 2021, 2022, and 2023 Annual Allocations are based on a 5 percent, 10 percent, and 15 percent Rampdown Rate, respectively

(5) The balance of Overproduction as of October 1, 2022 is based on the final WY 2022 water rights accounting, unless adjustments have been made and documented since publishing the prior year accounting. Overproduction can be remedied through under-pumping of the Annual Allocation or transfers and leases of BPA/Annual Allocation/Carryover.

(6) The amount of Overproduction that exceeds the Cumulative Maximum Overproduction Limit in column (f) must be resolved effective September 30, 2023 to avoid an Overproduction penalty assessment in the amount of \$500 per acre-foot of Overproduction: If (g) > (f), then (h) = (g) - (f), otherwise (h) = 0. The remaining balance of Overproduction does not need to be resolved until September 30, 2025.

(7) The Annual Allocation in each WY is determined by multiplying the Party's BPA by the Pumping Percentage in effect for that WY, based on the pumping Rampdown percentage then in effect pursuant to the Judgment. For example, in WY 2023 the Pumping Percentage is 85 percent, which is a 15 percent Rampdown from BPA. Annual Allocation is rounded to the nearest whole af. The subtotal and totals across all Parties is the sum of each Party's rounded Annual Allocation value.

(8) The Rampdown applies only to BPA Parties. For BPA Parties the WY 2023 pumping allocation is 85% of BPA, rounded to the nearest whole number. For BSUSD and ABDSP, the rights are not subject to Rampdown and annual allocation is always equal to the pumping right defined in the Judgment.

(9) The total allowable pumping for the Water Year is the sum of the Carryover account balance (e) plus the Annual Allocation (j) plus any leased/transferred Allocation or Carryover less the total balance of Overproduction (g). Allowable (m) = (e) + (j) + (k) + (l) - (g)

(10) Not all Parties were metered by October 1, 2023. "Estimated (P)" values were estimated for Parties with partial year metered data (the available data was used to estimate pumping for the WY based on the data available). "Estimated" values are for Parties with no meter data available in which case the pumping was estimated based on the method used in the GMP. "na" values represent parties who are not actively pumping and have no operable wells.

(11) Pursuant to Judgment Section III.G.1 "The first Groundwater produced by a Party during any Water Year will be deemed to be an exercise of any Carryover." If (e) > 0, then (p) = minimum of [(e)+(l)] or (n)

(12) (q) = If (n) > (e) + (j) + (k) + (l) - (g), then (n) - [(e) + (j) + (k) + (l) - (g)], otherwise 0

(13) The amount of Overproduction that exceeds the Cumulative Maximum Overproduction Limit in column (f) must be resolved effective September 30, 2023 to avoid an Overproduction penalty assessment in WY 2024. The penalty assessment rate is to be determined by the Board by June 30, 2024. If (q) > (f), then (r) = (q) - (f), otherwise (r) = 0. The remaining balance of Overproduction does not need to be resolved until September 30, 2025.

(14) If the Party has no Overproduction balance and has not reached their Maximum Allowable Carryover Account Balance, then the eligible Carryover is (t) = (j) + (k) - [(n) - (p)]. For Parties who are not eligible to elect full Carryover due to nearing or reaching the Maximum Allowable Carryover Account Balance, then the eligible Carryover is (t) = (d) - [(e)+(l)]-(p). Parties who are not in good standing with the Watermaster (either are not reporting pumping or have unpaid assessments) are not eligible for Carryover; in this case (t) is shown as "ne".

Other Notes:
 (A) In WY 2023, BWD purchased a portion of BPA, including the associated BPA parcel, from David and Juli Bauer, co-trustees of the D&J Bauer Family Trust 11-18-04. The BWD intends to follow the land in accordance with the Judgment following standards and transfer the BPA rights to its primary BPA rights. Until the land is followed, the BPA purchased by BWD remains attached to the BPA Parcel and can only be pumped for use on the subject Parcel. Thus, the BPA assigned to BWD is shown as a stand-alone entry in Exhibit 4 of the Judgment.
 (B) In WY 2023, William M. Bauer permanently transferred the entirety of their water rights, inclusive of full sale of the BPA/Carryover water and the associated BPA Parcel, to the BWD. A portion of W. Bauer's available Carryover water (35.10 af) was used to cover W. Bauer's pumping in WY 2023 that occurred prior to the transaction with BWD (pumping ceased after the transaction). The remaining Carryover water (439.43 af) is transferred to the BWD (see column [I]).
 (C) In WY 2023, BWD purchased the entirety of BPA and remaining Carryover water, including the associated BPA parcel, from William M. Bauer. The BWD intends to follow the land in accordance with the Judgment following standards and transfer the BPA rights to be accounted with its primary BPA rights. Until the land is followed, the BPA purchased by BWD remains attached to the BPA Parcel and can only be pumped for use on the subject Parcel. Thus, the BPA assigned to BWD is shown as a stand-alone entry in Exhibit 4 of the Judgment. The Carryover water can be transferred in accordance with the terms of the Judgment. In WY 2023, 19.55 af of the Carryover water obtained from W. Bauer was transferred to the BSUSD (see note [F]).
 (D) In WY 2023, T2 Palms, LLC acquired the BPA parcel assigned to John Doljanin through foreclosure. The BPA and its available Carryover water permanently transferred to T2 Palms, LLC. To exercise the water rights, T2 Palms must intervene into the Judgment to become a Party. A motion to intervene will be heard by the Court in December 2023. For the purpose of the Water Rights Accounting, T2 Palms, LLC is shown as the transferee holding the BPA and Carryover rights, though this remains subject to Court approval of the intervention.
 (E) In WY 2022, John Doljanin elected to Carryover 471.88 af of eligible Carryover. The WY 2023 Assessments were never paid by Doljanin. However, T2 Palms, LLC has informed the Watermaster it will cover the outstanding WY 2023 Assessments when its Party status is formally approved by the Court. Thus, the elected Carryover from WY 2022 is shown to Transfer to T2 Palms, LLC. Of the total available Carryover water of 471.88 af, 162.42 af will cover Doljanin's pumping in WY 2023 that occurred prior to the foreclosure; the remaining 309.46 af is Transferred to T2 Palms, LLC. As noted in note [D], the Transfer and status of T2 Palms as a Party is subject to Court approval of the intervention.
 (F) The Carryover water transferred to BSUSD from BWD is intended to cover the Overproduction balance of 19.55 af as of October 1, 2022. For this reason, it is not shown as "pumped" in column (p).

WY 2023 ACCOUNTING AMENDMENTS
 In WY 2024, BPA holder Joel Vanasden informed Watermaster Staff that there was a miscommunication, and they did not mean to elect Carryover from WY 2023. For this reason, Vanasden did not pay and is not intending to pay the associated pumping assessments issued in WY 2024 for the WY 2023 Carryover. The WY 2023 Water Rights Accounting was corrected to show that Vanasden elected zero acre-ft of eligible Carryover and the associated invoices were reversed to show no balance owed to the Watermaster.
 * Steven L. Phillips Separate Property Trust (former Wright Trust) pumping amended in based on detailed property use information provided in WY 2024 to reasonably re-estimate pumping for WY 2023. Due to the over-estimation of pumping for WY 2021, the Party over-paid assessments in WY 2022. The Party was reissued invoices based on the corrected estimated pumping.

Groundwater Level Time Histories – 1950 to 2025

Appendix G is a Digital Appendix and is only available online by accessing the following link:

<https://borregospringswatermaster.com/wp-content/uploads/2026/03/Digital-Appendix-G.-GWL-Time-Series.pdf>

Groundwater Quality Time Histories – 1970 to 2025

Appendix H is a Digital Appendix and is only available online by accessing the following link:

<https://borregospringswatermaster.com/wp-content/uploads/2026/03/Digital-Appendix-H.-GWQ-Time-Series.pdf>

Appendix I

Response to the Comments on the January 26, 2026 Draft Annual Report

Appendix I

Response to Comments on the Draft Water Year 2025 Annual Report

Watermaster received and responded to comments received on the January 26, 2026 draft of the *Water Year 2025 Annual Report for the Borrego Springs Subbasin*. The comments and responses are found in this Appendix H on the pages noted in parentheses. The following comments were received:

- Verbal comments received during the February 18, 2026 Public Hearing
- Written comments from Jim Bennett on behalf of the County of San Diego
- Written comments from Michele Staples (Jackson Tidus), on behalf of AAWARE
- Written comments from Trey Driscoll (INTERA), on behalf of BWD
- Written comments from Shannon Smith, on behalf of T2/Rams Hill

Verbal Comments Received During February 18, 2026 Public Hearing

No verbal Board or public comments that would affect the WY 2025 Annual Report were received during the February 18, 2026 Public Hearing.

Written Comments from Jim Bennett on behalf of the County of San Diego – Received January 29, 2026

Mr. Bennett provided an email summarizing four comments on the draft WY 2025 Annual Report (attached), which were primarily recommended updates to text in the report. All four comments were addressed in the revised Annual Report.

Written Comments from Michele Staples on behalf of AAWARE – Received February 18, 2026

Ms. Staples provided a letter of comments on the draft WY 2025 Annual Report (attached). Annotations were added to the attached file to number the comments. The following comments were addressed in the text as suggested: #1, #2, #5, #7, #8, #9, #10, #11, #14, #15, and #17.

The following comments were addressed in the text, but modified from the suggested comment:

- **Comment #4** – This comment was addressed by adding text to Section 3.4.1 to provide additional information on the redetermination of the 2025 Sustainable Yield, instead of adding additional text to Section 1.3.1 as suggested. Section 1.3.1 is background and not intended to detail implementation activities.
- **Comment #13** – This comment was addressed in tandem with Comment #1 from Mr. Bennett.

The following comments were not addressed. For each unaddressed comment, a brief description as to why the comment was not addressed is included:

- **Comment #3** – The average annual decline in groundwater storage since the start of GMP implementation is correctly reported and no edits are required. Revisions to the change in storage method, as documented in Chapter 5.5.2.2. of the WY 2025 Annual Report, resulted

Appendix I

Response to Comments on the Draft Water Year 2025 Annual Report

in changes to the historical estimates of the annual and cumulative changes in groundwater storage. Values reported in the WY 2025 Annual Report supersede values reported in prior Annual Reports.

- **Comment #6** – The sentence referenced is a direct quote from Judgment Section III.I.5, and as such, was not modified.
- **Comment #12** – The end of Section 3.1.2.3 already describes the culmination of the multi-year effort to expand the Watermaster’s Groundwater Monitoring Program, including the number of new wells added to the monitoring networks, the types of wells added, and the number of wells converted, secured, and rehabilitated. No changes were made to the text.
- **Comment #16** – Explaining how the change in methodology used to calculate the change in storage “affects the bottom line in the change in storage calculation this year compared to last year” is beyond the scope of work of the WY 2025 Annual Report. Section 5.5.2.2. describes the updates to the methods used to estimate the change in groundwater storage and identifies that the updated estimates used in the WY 2025 Annual Report supersede those reported in prior Annual Reports.

Written Comments from Trey Driscoll (INTERA) on behalf of Borrego Water District – Received February 19, 2026

Mr. Driscoll provided a letter of written comments on the draft WY 2025 Annual Report (attached) and a redline word file of text changes. The following comments were addressed: #3, #4, #5, #6, #7, #9, #10, #11, #12, and #14.

The following comments were addressed in the text, but modified from the suggested comment:

- **Comment #2** – Metered pumping data in WY 2021 is compared to WY 2025 to estimate the reduction in groundwater pumping since the start of the GMP implementation as both a percent and a volume. WY 2021 data is used in this comparison because it is directly comparable to WY 2025 data, since both are primarily based on metered data. Pumping in WY 2020 is estimated by the water duty method and is not directly comparable to metered pumping data in WY 2025.
- **Comment #8** – A summary of other water conservation measures for recreational and municipal users was added to Section 5.4.1.3 instead of Section 1.3.1.1, as suggested.

The following comments were not addressed. For each unaddressed comment, a brief description as to why the comment was not addressed is included:

- **Comment #1** – This comment pertains to information outside of the WY 2025 reporting period.
- **Comments #13, and #15 through #22** – These comments were provided for informational purposes only. No changes were made to the text of the WY 2025 Annual Report.

Appendix I

Response to Comments on the Draft Water Year 2025 Annual Report

Written Comments from Shannon Smith on behalf of T2/Rams Hill – Received February 23, 2026

Mr. Smith provided comments on the draft WY 2025 Annual Report as a redline word document with comments incorporated. The majority of the comments were addressed. Some modifications to suggested text were made. The following comments were addressed in the text, but modified from the suggested comment:

- The suggested text regarding Carryover added to the introduction of Section 1.3.1 was instead added to a subsection of Section of 1.3.1 entitled “Allowance for Carryover”.

The following comments were not addressed. For each unaddressed comment, a brief description as to why the comment was not addressed is included:

- The comment pertaining to reducing the scope of the Annual Report is beyond the scope of the WY 2025 Annual Report. This topic will be discussed by the Watermaster Board at a future meeting.



County of San Diego, Planning & Development Services
Sustainability Planning Division

Memorandum

TO: Lauren Salberg, Andy Malone, West Yost
FROM: Jim Bennett, P.G., C.HG., Water Resources Manager
SUBJECT: County Comments, Draft Water Year 2025 Annual Report for the Borrego Springs Subbasin
DATE: January 29, 2026

Here are County comments on the draft 2025 Annual Report:

1. Clarification of “Data Gaps” in Groundwater Monitoring: The draft Annual Report references “data gaps” in the groundwater-level and groundwater-quality monitoring networks in the Executive Summary (p. 2) and Section 3.1.2.3 (pp. 36–39). The adopted Groundwater Monitoring Plan identifies gaps in data and understanding; however, these gaps are described as targeted areas where additional monitoring would refine spatial and vertical resolution and improve hydrogeologic understanding, rather than as deficiencies in SGMA-required monitoring. The Monitoring Plan concludes that the existing monitoring networks are adequate to meet SGMA reporting requirements and frames additional monitoring as discretionary refinements. For clarity and consistency with the Monitoring Plan, the Annual Report should clarify that the referenced “data gaps” reflect opportunities for refinement rather than unmet SGMA monitoring requirements.
2. Section 3.5 Analysis of Carryover, first paragraph: To clarify that Carryover represents previously authorized Rampdown water and does not increase total allowable use, the following sentence is suggested to be inserted after the first sentence of paragraph 1: When exercised, Carryover is fully consumed and does not create additional pumping rights beyond those already accounted for under the Rampdown.
3. Minor Edit, Page 9, second paragraph, last sentence: The update, once completed and published, will be the 2026 GMP. constitute the first formal update to the 2020 GMP.
4. Minor Edit, Page 13. first paragraph , second to last sentence: The first 5-Year Assessment Report and a redline of the GMP (if applicable) is due to the DWR by June 2026 (as documented in the February 2025 DWR Staff Assessment Report approving the Judgment and GMP as an Alternative Plan).



February 18, 2026

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VIA EMAIL (lsalberg@westyost.com; BorregoSpringsWM@westyost.com)

Lauren Salberg
Borrego Springs Watermaster
West Yost
25 Edelman, Suite 120
Irvine, CA 92618

Re: Comments on WY 2025 Annual Report

Dear Ms. Salberg:

The following comments on the Draft Water Year 2025 Annual Report are submitted on behalf of the Agricultural Alliance for Water and Resource Education (“AAWARE”).

1. For future draft Annual Reports, please consider publishing a comparison with the last year’s Annual Report. It would be helpful to see what information was added or changed
2. Report p. 2 (pdf p. 11) – consider adding to first bullet a summary of the model update effort associated with recalculation of Sustainable Yield
3. Report p. 4 (pdf p. 13) – last bullet before Section 6 – please double check accuracy. The summary says that the rate of storage change is decreasing since GMP implementation began. However, last year’s summary says the storage change rate was about 3,375 AFY, while this year’s summary increases the storage change rate to 3,457 AFY. Is this discrepancy the result of changing from spring-to-spring to fall-to-fall in calculating change in storage, as described in footnote 75 and Section 5.5.3.2 (Report pp. 110, 116 (pdf pp. 119, 125))?
4. Report p. 10 (pdf p. 19) – Determination of Sustainable Yield – in the last paragraph on p. 19:
 - add information summarizing the “updated data” used to redetermine Sustainable Yield;
 - add that the BVHM model results demonstrated pumping at the recalculated Sustainable Yield and Rampdown would not cause an Undesirable Result, and that sustainability will be achieved by 2040;

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- include the following info that was in last year's Annual Report summary of Determination of Sustainable Yield:

Sustainable Yield estimates must be made using the best available records and data, and sound scientific and engineering methods. The redetermined Sustainable Yield will consider all sources of replenishment, including return flows and underflows, and all outflows from the Basin, and will consider, among other data, information derived from updated runs of the BVHM. After input and recommendation from the TAC, the Watermaster will revise the determination of Sustainable Yield.

#5

Report p. 11 (pdf p. 20) – in the last paragraph: add language to summarize the primary data supporting the 40% increase relative to the initial 5,700 AFY Sustainable Yield

#6

Report p. 12 (pdf p. 21) – Allowance for Leases and Transfers of BPA: Clarify the last sentence before the “Remedies and Penalties for Overproduction” section. As written, it gives the mistaken impression that the Watermaster may only restrict transfers and leases that are subject to Watermaster approval. That is not the case. All transfers are subject to conditions/restrictions as needed to avoid causing or exacerbating Undesirable Results

#7

Report p. 14 (pdf p. 23) PMA No. 1 – include reference to Section III.J (following standards applicable to permanent transfers to another party), as in last year's Annual Report to read as follows: The relevant procedures are specified in Sections III.I and III.J.”

#8

Report p. 14 (pdf p. 23) – PMA No. 6 – the “purpose of an intra-subbasin transfer program” was changed from last year's Annual Report. This year's statement of purpose gives the mistaken impression that implementation of the Rampdown causes reductions in groundwater storage and groundwater quality impairment. The following is how this year's Draft Annual Report reads:

The purpose of an intra-subbasin transfer program would be to physically mitigate existing and future reductions in groundwater storage and groundwater quality impairment ***caused by implementation of the Rampdown***, through pumping optimization and establishing intra-basin conveyance capability, subject to feasibility and effectiveness evaluations. The GMP describes PMA No. 6 as a mechanism that could relocate groundwater pumping from areas with more stressed conditions (e.g., declining levels or poorer water quality) to areas where groundwater conditions are more favorable for continued extraction and to optimize Basin-wide pumping patterns that would prevent Undesirable Results. Under Section III.I.5 of the Judgment, in order to protect the Basin against Undesirable Results, the Watermaster, with input from the TAC, may restrict Permanent Transfers and Leases to specific areas of the Basin based on reasonable, evidence-based concern that a Permanent Transfer or Lease will cause or exacerbate Undesirable Results, and then only in a manner that is equitable to all affected Pumpers. The Judgment does not specify that PMA No. 6 be implemented, though the PMA may be necessitated if transfers need to be restricted to avoid Undesirable Results.

The purpose statement needs to be corrected to delete “caused by implementation of the Rampdown” that was added to this year’s summary of PMA No. 6. For comparison, last year’s Annual Report summarized PMA No. 6 as follows:

PMA No. 6 – Intra-Subbasin Water Transfers. The purpose of an intra-subbasin transfer program would be to physically mitigate existing and future reductions in groundwater storage and groundwater quality impairment through pumping optimization and conveyance. Under Section III.I.5 of the Judgment, in order to protect the Basin against Undesirable Results, the Watermaster, with input from the TAC, may restrict Permanent Transfers and Leases to specific areas of the Basin based on reasonable, evidence-based concern that a Permanent Transfer or Lease will cause or exacerbate Undesirable Results, and then only in a manner that is equitable to all affected Pumpers.

#9 Report p. 19 (pdf p. 28) – Watermaster Administrative Activities. A paragraph should be added to this section similar to last year’s Annual Report about the Watermaster Board’s Policy Regarding the Use of Best Available Science. Even though the Policy was approved last year, it remains an important Policy by which Watermaster governs together with the Rules and Regulations, and should be highlighted somewhere in this section on Watermaster Administrative Activities. The following is how the Policy was summarized in last year’s Annual Report:

Additionally in 2024, the Board approved an official *Policy Regarding the Use of Best Available Science*. The purpose of the policy is to delineate how the Borrego Springs Watermaster employs the concept of “best available science” when administering and enforcing the Judgment. Consistent with state law, “best available science” is a standard used in service of policy decisions made by the Watermaster to ensure the quality and relevance of the technical information and data that inform those choices. Compliance with this policy will ensure the efficient use of the Watermaster’s limited resources and that technical information and data will be evaluated in a manner that is impartial, and without favor or prejudice to any Pumper or Party.

#10 Report p. 31 (pdf p. 40) – Section 3.1.1.2 Meter Reading Program - consider adding to the last sentence before Section 3.1.1.3 that there was near total compliance with the meter reading program in 2025

#11 Report p. 33 (pdf p. 42) – Section 3.1.2.2 Groundwater Monitoring Network as of WY 2025 – in the third paragraph, consider adding that the 71 groundwater wells in the monitoring network is an increase of 19 monitoring wells since WY 2024. Likewise, the last bullet under groundwater level monitoring wells should call out the increase of 9 wells measured at a high frequency interval over WY 2024, and the last bullet under groundwater quality monitoring wells should call out the increase of 6 wells as dedicated monitoring wells. Consider also adding the total number of each category of monitoring wells added since inception of the Physical Solution.

#12 Report p. 37 (pdf p. 46) – 3rd bullet – consider adding information to the second and last bullets: of the 67 candidate wells identified, how many additional monitoring wells have been added since adoption of the groundwater monitoring program; and, of the wells that required additional work, how many were converted/secured/rehabilitated since adoption of the groundwater monitoring program

#13

Report p. 39 (pdf p. 48) – the last paragraph references 7 data gaps in the groundwater level monitoring network and 9 data gaps in the groundwater quality monitoring network. Please clarify – where are these data gaps reported/identified? It seems surprising that so many gaps still remain after the significant expansion of the monitoring network

#14

Report p. 51 (pdf p. 60) – the last paragraph concludes that “there is a potential that the Carryover rules could result in Undesirable Results”. This inaccurate statement must be corrected. Under the Judgment’s Carryover rules (Judgment, Section III.B, pp. 18-19), there are perpetual backstop provisions that prevent Undesirable Results from resulting from the implementation of the Physical Solution:

- 1) Carryover becomes available only if pumping is below the Sustainable Yield in any Water Year, so it would not be mathematically possible to pump in excess of the Sustainable Yield over the sustainability period, even if it is possible to pump in excess of the Sustainable Yield in a given Water Year;
- 2) Carryover is accounted as the first water pumped in any year. This minimizes accrued Carryover;
- 3) the Judgment includes is a Court procedure in place for the Watermaster is to adjust the amount of individual Carryover (currently capped at two times the Party’s BPA) or the duration that Carryover may be held within the Basin to prevent Undersirable Results;
- 4) Basin-wide Rampdown is to be increased if needed to prevent Undesirable Results of pumping accrued Carryover; and
- 5) the Watermaster has invested heavily in monitoring and modeling to predict the potential for triggering Undesirable Results as necessary to enable Watermaster to take proactive measures to ensure that the Basin does not experience Undesirable Results from the Physical Solution

#15

Report p. 54 (pdf p. 63) – Section 3.7, Groundwater Dependent Ecosystem Study – the last bullet before Section 3.8 should be corrected to read similar to the last sentence in Section 3.7 about Biological Restoration of Fallowed Lands. The Watermaster Board may or may not approve scope, schedule and budget for additional Watermaster work. Consider revising the last bullet as follows: “The Watermaster Board will consider the Recommendations Reports and determine whether to approve any additional Watermaster work, and if so, next steps (which may include scope, schedule, and budget).”

#16

Report pp. 110, 116 (pdf pp. 119, 125) – Change in Groundwater Storage – footnote⁷⁵ and Section 5.5.3.2 explain that this year’s Annual Report is now reporting change in storage based on fall-to-fall instead of spring-to-spring measurements as in prior Annual Reports. Consider summarizing how this change in methodology affects the bottom line in the change in storage calculation this year compared to last year – for example, does this explain the apparent

discrepancy at page 4, that seems to show a higher storage change rate than last year even though the actual rate of change in storage has decreased?

Non-substantive corrections/clarifications:

#17

Report p. 11 (pdf p. 20) – please clarify. This section of the Draft Annual Report says Rampdown by 66 percent over the 20-year period to 33 percent of BPA. If Rampdown is 66 percent, pumping should be 34 percent of BPA. However, Report Section 1.3.2.2 at page 13 (pdf p. 22) and elsewhere says Rampdown totals 67 percent reduction in pumping. Make the Rampdown consistent throughout, either 66 percent Rampdown to 34 percent of BPA, or 67 percent Rampdown to 33 percent of BPA.

Thank you for the opportunity to comment on the Draft WY 2025 Annual Report. If you have any questions, please contact me.

Sincerely,



Michele A. Staples

Cc: Samantha Adams (via email sadams@westyost.com)
Andy Malone (via email amalone@westyost.com)



To: Lauren Salberg, PG, Andy Malone, PG and Samantha Adams
From: Trey Driscoll, PG, CHG
Subject: Comments on Water Year 2025 Borrego Springs Annual Report
Date: February 19, 2026
cc: Borrego Springs Watermaster, Geoff Poole, Borrego Water District
Enclosure: MS Word Track Changes WY 2025 Annual Report

Thank you for the opportunity to review and comment on the Water Year 2025 Borrego Springs Annual Report (WY 2025 Annual Report). Overall, the WY 2025 Annual Report was well done by Watermaster staff and represents yet another significant milestone for the stakeholders within the Borrego Springs Subbasin (Basin) to steward groundwater resources and achieve the Basin's sustainability goal by 2040. Please see below for Specific Comments.

Specific Comments:

Comment 1. In the Executive Summary it states that the Watermaster has "Implemented a monthly meter reading program to assess seasonal pumping trends". Since the metering program is now performed semi-annually, would it be better to remove "monthly" from this bullet.

Comment 2. In the Executive Summary it states that "Groundwater pumping has reduced by 39 percent since the start of GMP implementation in WY 2020". We suggest stating here that volume of pumping in WY 2020 and WY 2025.

Comment 3. In the Executive Summary it states the Watermaster, "Achieved a reduced rate of groundwater storage decline during GMP implementation. The average annual groundwater storage losses have decreased from approximately 7,960 acre-feet per year (afy) prior to GMP implementation (WY 1945 through 2019) to approximately 3,460 afy (WY 2020 through 2025), consistent with reduced pumping under the GMP and Rampdown." Current conditions (i.e. -1,826) are less than the historical average. It may be beneficial to highlight this accomplishment, as the reduction achieved in the most recent water year is smaller than the long-term average, underscoring the significance of continued progress even as improvements become more incremental over time.

Comment 4. In the Executive Summary it states the Watermaster, "Significantly expanded the Groundwater Monitoring Program to achieve near Basin-wide coverage for groundwater level and quality monitoring. Through implementation of the 2023 Groundwater Monitoring Program, and with funding support from the Proposition 64 Sustainable Groundwater Management (SGM) grant program, 21 wells were added to the monitoring network since WY 2023." Potentially suggest removing "near". Borrego has significant monitoring density compared to other critically overdraft Basins and meets SGMA monitoring density requirements. While a network can always improve to fill data gaps, we should be able to state that we have Basin-wide coverage for SGMA compliance purposes.

Comment 5. In the Executive Summary it states that the "Parties with BPA elected to Carryover a total of 8,635.97 af of the available unpumped Annual Allocation to WY 2026." It is advisable to report this metric as a percentage to offer greater context regarding overall BPA.

Comment 6. In Section 1.3.1 Stipulated Judgment, it states that “Under the Rampdown schedule to the 2025 Sustainable Yield, the Annual Allocation is ramped down to 66 percent of BPA by WY 2030 and to 33 percent of BPA over the 20-year implementation period. See Section 3.4.1 for more information on the changes to the Rampdown schedule under the 2025 Sustainable Yield.”

Recommend adding the percentage of reduction as follows:

Under the Rampdown schedule to the 2025 Sustainable Yield, the Annual Allocation is ramped down to 66 percent of BPA (*34 percent reduction*) by WY 2030 and to 33 percent of BPA (*67 percent reduction*) over the 20-year implementation period. See Section 3.4.1 for more information on the changes to the Rampdown schedule under the 2025 Sustainable Yield.”

Comment 7. In Section 1.3.1.1 Overview of the GMP Projects and Management Actions, it states that “The primary management tool to eliminate overdraft is to Rampdown pumping to a level that does not exceed the Basin’s estimated Sustainable Yield by 2040 – a Rampdown that will be on the order of a 67 percent reduction in pumping relative to pre-SGMA conditions.”

Recommend updating as follows:

The primary management tool to eliminate overdraft is to Rampdown pumping to a level that does not exceed the Basin’s estimated Sustainable Yield by 2040 – a Rampdown that will be on the order of *33 percent of BPA or a 67 percent reduction in pumping relative to pre-SGMA conditions.*

Comment 8. In Section 1.3.1.1 Overview of the GMP Projects and Management Actions, for PMA No. 2, we recommend documenting water conservation measures including 1) Municipal Advanced Metering Infrastructure (AMI) metering of all BWD connections funded by DWR’s Proposition 68 that provides for real-time tracking to identify leaks and improve indoor and outdoor water use efficiency, 2) Metering of all non-de minimis Irrigation and Recreation wells that provides data to improve irrigation efficiency and identify and repair leaks, 3) Turf replacement at Rams Hill (see below) and de Anza Desert Club. Other efforts include turf replacement by Recreation, improved irrigation scheduling, use of soil moisture probes etc.

Borrego Water District received Proposition 68 Sustainable Groundwater Management (SGM) grant funding from DWR to support implementation projects under the Borrego Springs Subbasin Alternative to a Groundwater Sustainability Plan. One of the funded components is Automated Metering Infrastructure (AMI) identified as Project Component No. 2 under the Prop 68 grant. This component consists of replacement of over 2,000 manual water meters in the BWD service area with an advanced metering system and focus on demand-side reductions in groundwater pumping through improved monitoring and customer awareness. AMI is intended to improve water-use efficiency, enhance leak detection and enable more immediate response to abnormal usage patterns in both residential and commercial sectors. Based on historical trends, the AMI component is expected to result in approximately 20 acre-feet per year of water savings.

Rams Hill has implemented several water conservation and golf course improvements over the last decade to optimize water use. In June 2023, Rams Hill launched Phase 1 of its agronomy plan, converting the greens from bentgrass to Mini Verde bermudagrass while also replanting the practice areas with TifTuf bermudagrass including bermudagrass conversion. In June 2024, Rams Hill launched Phase 2 of its agronomy plan with TifTuf bermudagrass conversion expanded to all tees, fairways

replacing ryegrass and bentgrass (cool-season grasses). When fully implemented, the improvements are estimated to reduce water use by as much as 30 percent when stabilized (Rams Hill 2024).

Suggest reaching out to De Anza and other golf courses to document historical and planned water conservation and golf course improvements.

Comment 9. In Section 3.1.2.1 Groundwater Monitoring Plan, it states that “Frequently Asked Questions about participating in the GWPM.” Change to GWMP?

Comment 10. In Section 3.1.2.3 Efforts to Expand and Maintain the Groundwater Monitoring Program, it states that “Performed maintenance activities and properly secure five inactive wells to convert them to groundwater-level monitoring wells.” Recommend to change “secure” to “secured”.

Comment 11. In Section 3.1.2.3 Efforts to Expand and Maintain the Groundwater Monitoring Program, it states that “One new well recently constructed by BWD (an existing participant in the monitoring program). This well is monitored by BWD and data is shared with Watermaster staff semi-annually.” Recommend stating the well that the Watermaster is referring.

Comment 12. In Section 3.4.1 Redetermination of the 2025 Sustainable Yield, it states that “Under the Rampdown schedule to the 2025 Sustainable Yield, the Annual Allocation is ramped down to 66 percent of BPA by WY 2030 and to 33 percent of BPA over the 20-year implementation period.”

Recommend updating as follows:

Under the Rampdown schedule to the 2025 Sustainable Yield, the Annual Allocation is ramped down to 66 percent of BPA (*34 percent reduction of pumping*) by WY 2030 and to 33 percent of BPA (*67 percent reduction of pumping*) over the 20-year implementation period.

Comment 13. In Section 5.5.1.1 Historical Trends and Current Conditions, it states that “In the SMA, groundwater elevations have increased or remained relatively stable in the shallow aquifer system (see Figures G-44, G-48, G-60, G-61, and G-63), but pumping at several deep wells over the last several years has created a concentrated depression in piezometric levels within the confined deep aquifer system (see Figures G-57 and G-59).”

We note that available aquifer test and monitoring data indicates the lower aquifer is confined. Coefficient of storage calculated in the SMA for Jack Crosby Well is 2.3×10^{-4} and MW-3 is 1.89×10^{-4} . Confined aquifer typically ranges from 1×10^{-5} to 1×10^{-3} (Driscoll 1986). This comment is for informational purposes only and the test as written is accurate.

Comment 14. Table 22. Groundwater Level Trends at Representative Monitoring Wells Fall 2019 to Fall 2025. Concerned that a state agency reviewer of this 6-year period would suggest that the Basin still has a chronic lowering of groundwater issue which is not the case. May want to compare to more recent trend that indicates stable groundwater levels in most wells year over year.

Comment 15. Figure 14. History of Groundwater Storage Change Compared to Sustainable Management Criteria. Compared manual change in storage method to BVHM 2022 for WY 21 - 5,040 AF and WY - 2022 - 5,956 AF. Overall, the manual methods and BVHM method seem close and are good for tracking purposes. This comment is for informational purposes only.

Comment 16. Figure 19. Total Dissolved Solids (TDS) in Groundwater. One data point for MW-1 TDS appears anomalous. Has this data point undergone QA/QC? This comment is for informational purposes only.

Comment 17. Figure 19. Total Dissolved Solids (TDS) in Groundwater. Air Ranch TDS has high variability. Concerned about future TDS impacts in SMA as RH-1 also has historical spikes in TDS above the recommended MCL of 1,000 mg/L. This comment is for informational purposes only.

Comment 18. Figure 20. Nitrate (as Nitrogen) in Groundwater. SMA nitrate appears to be increasing slightly over time, suggesting an anthropogenic source from recharge. This comment is for informational purposes only.

Comment 19. Figure 21. Arsenic in Groundwater. ID4-4 and ID4-9 have some unusually high arsenic readings for the NMA. Maybe we need to make sure samples are filtered if any sediment is in the water as there may be leaching of arsenate from the sediment in the water quality sample? For accurate arsenic laboratory reading, water samples for dissolved arsenic analysis should be filtered, in the field, using a filter within 15 minutes of collection, depending on the specific analytical method. Field filtration is critical to remove suspended particulates that can cause interference, with filtered samples then acidified for preservation. This comment is for informational purposes only.

Comment 20. Figure 21. Arsenic in Groundwater. Increasing arsenic trend in ID1-16 may require additional evaluation. Also, see comment 19. This comment is for informational purposes only.

Comment 21. Figure 21. Arsenic in Groundwater. ID1-8 taken out of service. Are we replacing this well in the water quality monitoring network in future reporting?

Comment 22. Figure 22. Sulfate in Groundwater. Air Ranch sulfate is high and may exceed MCL in the future. This comment is for informational purposes only.

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