Call and Notice of Special Meeting of Borrego Springs Watermaster Board

The undersigned Chairperson of the Borrego Springs Watermaster Board of Directors does hereby call and set a Special Meeting of that Board to occur Wednesday, June 24, 2026 at 9:00am. This meeting will be held in place of the regular June meeting date. The primary purpose of the meeting is to: i) consider approval of the draft final 5-Year Assessment Report and 2026 Groundwater Management Plan (GMP) Update and, ii) consider approval to file a Motion with the Court to amend the Judgment to replace the existing Exhibit 1 with the 2026 GMP Update. The Board will also conduct other routine business. The full meeting agenda for that Special Meeting and the direction for the public to access the meeting will be sent to the Watermaster distribution list and posted to the Watermaster website (Borrego Springs Watermaster) at least 24 hours in advance of the meeting.

Dated: 6.14.26

Tyler Bilyk, Chairperson
Borrego Springs Watermaster Board

Borrego Springs Watermaster
Special Board Meeting
June 24, 2026 @ 9:00 a.m.
Meeting Available by Remote Access Only*

Please join my meeting from your computer, tablet or smartphone.
https://meet.goto.com/986866517

You can also dial in using your phone.
United States (Toll Free): 1 877 309 2073 or United States: +1 (646) 749-3129

Access Code: 986-866-517

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https://meet.goto.com/install

Instructions for Public Comment

The public may address the Board on items within the Watermaster's Jurisdiction that are included or not included on the meeting agenda.

To address the Board on items that are not included on the meeting agenda, the public may request to speak during ***Agenda Item II – Public Correspondence***. Comments may be limited to three minutes per speaker.

To address the Board on items that are included on the meeting agenda, the Board Chairperson will call for public comments immediately following the agenda item's staff report presentation and prior to Board discussion.

AGENDA

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

I. OPENING PROCEDURES (Chair)

A. Call to Order and Begin Meeting Recording
B. Pledge of Allegiance
C. Roll Call
D. Approval of Agenda

II. PUBLIC CORRESPONDENCE/COMMENT (Chair)

The Board may direct staff to include topics brought forward during Public Correspondence and Comment on a future meeting agenda. No action or discussion is otherwise taken by the Board. Written correspondence includes items received between May 28, 2026 and June 17, 2026.

A. Correspondence Received – *none received*
B. Public Comment

III. **CONSENT CALENDAR (Chair)**

Action Item: All items may be approved with a single motion

IV. ITEMS FOR BOARD CONSIDERATION AND POSSIBLE ACTION

V. REPORTS

A. Legal Counsel Report – *verbal*

B. Technical Consultant Report – *verbal*

- Annual Meter Verifications
- Pumping Assessments for WY 2026
- BPA and Party Updates

D. Chairperson's Report – *verbal*

VII. BOARD MEMBER COMMENTS

VIII. NEXT MEETINGS OF THE BORREGO SPRINGS WATERMASTER

A. Regular Board Meeting – Wednesday, August 19, 2026 at 3:00 pm

B. Regular Board Meeting – Wednesday, October 21, 2026 at 3:00 pm

IX. ADJOURNMENT

MINUTES
BORREGO SPRINGS WATERMASTER BOARD MEETING
Conducted Virtually via GoToMeeting
Wednesday, May 20, 2026, 3:00 p.m.

The following individuals were present at the meeting:

Directors Present	Chair Tyler Bilyk – Agricultural Sector
	Vice Chair Jim Bennett – County of San Diego
	Treasurer Shannon Smith – Recreational Sector
	Secretary Gina Moran – Borrego Water District (BWD)
	Mark Jorgensen – Community Representative
Watermaster Staff Present	James M. Markman, Legal Counsel
	Samantha Adams, Executive Director, West Yost
	Andrew Malone, Lead Technical Consultant, West Yost
	Lauren Salberg, Staff Geologist, West Yost
Others Present	David Garmon
	Geoff Poole
	Gina Moran, BWD Board Member
	Jessica Clabaugh, BWD Finance Office
	Jim Dax, Board Alternate – Community Representative
	Kathy Dice, BWD Board Member
	Laurel Brigham, UCI
	Rich Pinel, Board Alternate – Recreational Sector
	Rodney Bruce, Rams Hill
	Stephanie and Thomas DiPalma
	Steve Anderson, BB&K, representing BWD
	Tammy Baker, BWD Board Member and Board Alternate - BWD
	Travis Huxman, UCI
	Trey Driscoll, Intera, TAC Member representing BWD

Please visit the Watermaster's Website[1] to access the Agenda Packet, recording, and presentation for the May 20, 2026 Meeting. The following meeting minutes identify the start time each agenda item discussion (hours, minutes, seconds: 00:00:00), which can be used as a reference to find and listen to the details of each topic discussed in the meeting recording for specifics and context.

I. **Opening Procedures**

A. Chair Bilyk called the meeting to order at 3:00 PM at which time the meeting recording was started. 00:00:00

B. Chair Bilyk led the meeting participants in the Pledge of Allegiance. 00:00:13

C. Samantha Adams, Executive Director (ED) called roll and confirmed that a quorum of all members of the Board were present. 00:00:32

D. Approval of Agenda. The Board discussed the agenda topics for the May 20, 2026 Board meeting. 00:01:00

[1] https://borregospringswatermaster.com/past-watermaster-meetings/

Motion: Motioned by Director Jorgensen, seconded by Chair Bilyk to approve the Agenda. 00:01:23

Motion carried unanimously by voice vote (5-0-0).

II. **Public Correspondence**

A. *Correspondence Received*. Chair Bilyk referenced the correspondence included in the agenda package. 00:01:44

B. *Public Comments*. Chair Bilyk called for public comments. Public comment was made by: 00:02:47

- David Garmon on the topic of the University of California Irvine (UCI) Groundwater Dependent Ecosystem (GDE) Study Report and the Technical Consultant (TC) and TAC/EWG Recommendation Reports.
- Jim Dax on the topic of the UCI GDE Study Report and the TC and TAC/EWG Recommendation Reports.

III. **Consent Calendar**

Chair Bilyk called for discussion on the Consent Calendar items included in the May 20, 2026 agenda package. 00:07:55

- There were no public comments.
- Board discussion ensued to determine action.

Motion: Motioned by Director Moran, seconded by Director Jorgensen, to approve the Consent Calendar. 00:10:01

Motion carried unanimously by roll-call vote (5-0-0).

IV. **Items for Board Consideration and Possible Action**

A. *Technical Consultant and TAC/EWG Recommendations on the Next Steps Related to UCI GDE Study Report.* Andy Malone gave a presentation on the TC and TAC/EWG Recommendation Reports. 00:10:28

- Public comments were made by David Garmon, Rich Pinel, Tammy Baker, Stephanie DiPalma, and Jim Dax.
- The Board directed Staff to proceed with preparing a legal opinion on whether the Watermaster's management and proposed monitoring programs satisfy SGMA requirements regarding consideration of potential GDEs. The legal opinion should be prepared using WY 2026 budget, be submitted with sufficient time for review by the Settling Party attorneys, and be brought to the Board for review at the August Board meeting.

Motion: Motioned by Director Moran, seconded by Director Smith, to create a subcommittee of Directors Smith and Jorgensen and directing them to proceed with inquiring about irrigating mesquite on private land. 01:59:27

Motion carried unanimously by roll-call vote (5-0-0).

B. *TAC Recommendations on Technical Scope-of-Work to Redetermine Sustainable Yield by 2030.* Mr. Malone gave a presentation summarizing TAC feedback received at its May 4, 2026 TAC meeting and the memo included in the agenda package. 02:01:31

- There were no public comments.
- Board discussion ensued. Following discussion, the Board directed Staff to: i) use Budget Option B (no HCM update) in the draft WY 2027 budget, and ii) not bring this topic back to the TAC for further discussion.

C. *Draft WY 2027 Budget.* ED Adams summarized the draft WY 2027 budget included in the agenda package and requested Board feedback. 02:18:12

- Public comment was made by Rich Pinel.
- Board discussion ensued. Following discussion, the Board directed Staff to prepare the draft final budget for WY 2027 in consideration of the Board's input.

D. *Technical Review of Transfer Applications.* ED Adams provided a summary of the memo included in the agenda package. 02:44:32

- Public comment was made by Trey Driscoll.
- Board discussion ensued. Following discussion, the Board directed Staff to proceed with developing a draft interim framework for transfer evaluations using existing information (Option #1 in the agenda package) and obtaining TAC feedback on the draft framework at the June TAC meeting.

E. *Consideration of Approval of June 2026 TAC Meeting Agenda.* ED Adams provided a summary of the memo included in the agenda package. 03:48:34

- No public comments were made.
- Board discussion ensued to determine action.

Motion: Motioned by Vice Chair Bennett, seconded by Chair Bilyk, to approve the June TAC agenda, including (i) discussion on the technical analysis for water rights transfers, and (ii) a 15-minute presentation by Trey Driscoll on his memo to the Board and TAC. 03:52:44

Motion carried unanimously by roll-call vote (5-0-0).

F. *Review of Pumping-to-Date in WY 2026.* Lauren Salberg reviewed the status of pumping-to date in WY 2026. 03:53:20

- Public comment was made by Tammy Baker.
- Board discussion ensued and no action was taken.

V. **Reports.**

A. *Legal Counsel Report.* Mr. Markman had no topics to report on. 04:03:48

- There was no Board discussion.

B. *Technical Consultant Report.* Mr. Malone reported on the items listed in the agenda package memo (see slides 67 through 68 of the Board presentation slides). 04:03:55

- There was no Board discussion.

C. *Executive Director Report.* ED Adams reported on the items listed in the agenda package memo (see slides 69 through 71 of the Board presentation slides). 04:06:40

- There was no Board discussion.

D. *Chairperson's Report.* Chair Bilyk had no report. 04:12:53

VI. **Approval of Agenda Items for June 3, 2026 Special Board Meeting**

ED Adams reviewed the list of potential agenda items for the next several Board meetings listed in the agenda package. 04:13:03

- There were no public comments.
- Board discussion ensued to determine action.

Motion: Motioned by Chair Bilyk, seconded by Director Moran, to approve the following agenda for the June 3, 2026 Special Board Meeting: 04:16:29

- Consideration of approval of changes to the 5-Year Assessment Report and 2026 GMP Update
- WY 2027 Draft Budget

Motion carried unanimously by roll-call vote (5-0-0).

VII. **Board Member Comments**

Chair Bilyk called for comments. Board discussion, including Legal Counsel opinion, included: 04:17:01

- Recommendation to publicize that the Basin is on-track to pump below its Sustainable Yield in Wy 2026 by publishing the information in the local newspapers and sending to DWR.
- Next steps on Board discussion on the UCI GDE Study Report.

VIII. **Next Meetings of the Borrego Springs Watermaster**

Chair Bilyk reviewed the meetings listed in the agenda package. 04:21:33

IX. **Adjournment**

Chair Bilyk adjourned the meeting at 7:22 PM. 04:21:56

Recorded by:
Lauren Salberg, Staff Geologist, West Yost

Attest:
Gina Moran, Secretary of the Board

MINUTES
BORREGO SPRINGS WATERMASTER SPECIAL BOARD MEETING
Conducted Virtually via GoToMeeting
Wednesday, June 3, 2026, 10:00 a.m.

The following individuals were present at the meeting:

Directors Present	Chair Tyler Bilyk – Agricultural Sector
	Vice Chair Jim Bennett – County of San Diego
	Treasurer Shannon Smith – Recreational Sector
	Secretary Gina Moran – Borrego Water District (BWD)
	Mark Jorgensen – Community Representative
Watermaster Staff Present	James M. Markman, Legal Counsel
	Samantha Adams, Executive Director, West Yost
	Lauren Salberg, Staff Geologist, West Yost
Others Present	Geoff Poole, BWD General Manager
	George Peraza, DWR
	Jessica Clabaugh, BWD Finance Office
	Lee Alan Scharf
	Marisa Earll, Intera
	Rich Pinel, Board Alternate – Recreational Sector
	Stephanie and Thomas DiPalma
	Steve Anderson, BB&K, representing BWD
	Tammy Baker, BWD Board Member and Board Alternate - BWD
	Travis Huxman, UCI
	Trey Driscoll, Intera, TAC Member representing BWD
	Yara Pasner, Intera

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I. **Opening Procedures**

A. Chair Bilyk called the meeting to order at 10:00 AM at which time the meeting recording was started. 00:00:00

B. Chair Bilyk led the meeting participants in the Pledge of Allegiance. 00:00:20

C. Samantha Adams, Executive Director (ED) called roll and confirmed that a quorum of all members of the Board were present. 00:00:38

D. Approval of Agenda. The Board discussed the agenda topics for the June 3, 2026 Board meeting. 00:01:19

Motion: Motioned by Director Jorgensen, seconded by Director Moran to approve the Agenda. *Motion carried unanimously by voice vote (5-0-0).* 00:01:39

[1] https://borregospringswatermaster.com/past-watermaster-meetings/

II. **Public Correspondence**

A. *Correspondence Received*. Chair Bilyk referenced the correspondence included in the agenda package. 00:02:05

B. *Public Comments*. Chair Bilyk called for public comments. There were no public comments. 00:02:41

III. **Items for Board Consideration and Possible Action**

A. *Consideration of Approval of Changes to the 5-Year Assessment Report and 2026 GMP Update.* ED Adams gave a summary of the memo included in the agenda package. 00:03:37

- There were no public comments.
- Board discussion ensued, and the Board directed Staff to respond to public comments as proposed in the staff memo and to prepare and notice the draft final 5-Year Assessment Report and 2026 GMP Update.

B. *Consideration of Approval of the WY 2027 Budget.* ED Adams summarized the draft WY 2027 budget included in the agenda package. 00:33:03

- Public comment was made by Rich Pinel.
- Board discussion ensued to determine action.

Motion: Motioned by Director Smith, seconded by Director Moran, to approve WY 2027 Budget as defined in the Staff memo, with a revision to the scope of work on the Groundwater Monitoring Program line-item which would include: i) preparation of a Groundwater Optimization Memo at a cost not to exceed $20,000 and ii) reduction in monitoring events for Spring 2027 to provide that the budget for this line-item would not exceed $119,742. 01:04:44

Motion carried unanimously by roll-call vote (5-0-0).

C. *Next Steps on Requested Public Outreach Efforts.* ED Adams provided a summary of the memo included in the agenda package. 01:11:34

- Public comment was made by Stephanie Di Palma.
- Board discussion ensued and the Board directed Staff to: i) provide examples of public outreach materials by West Yost to the Board ahead of the June 24, 2026 Board Meeting and ii) develop a draft public outreach product, focused on communicating results from the Spring 2026 Semi-Annual Monitoring Report for Board review at its August 2026 meeting.

IV. **Reports.**

A. *Legal Counsel Report.* Mr. Markman had no topics to report on. 01:26:44

- The Board asked Mr. Markman to provide an update on the schedule for the preparation of a legal opinion on SGMA and groundwater dependent ecosystems (GDEs).

B. *Chairperson's Report.* Chair Bilyk had no report. 01:26:50

V. **Approval of Agenda Items for June 24, 2026 Special Board Meeting**

ED Adams reviewed the list of potential agenda items for the next several Board meetings listed in the agenda package. 01:27:58

- There were not public comments.
- Board discussion ensued to determine action.

Motion: Motioned by Director Moran seconded by Chair Bilyk, to approve the following agenda for the June 24, 2026 Special Board Meeting: 01:31:33

- Consideration of Approval of the 5-Yr Assessment Report and 2026 GMP Update, as follows:
  - Finalize the 5-Yr Assessment Report and 2026 GMP Update, with any final recommended changes
  - Submit the reports to DWR by June 25, 2026
  - File a motion with the Court to amend the Judgment to replace Exhibit 1 with the 2026 GMP Update, with notice to all Parties
  - Schedule a Court hearing on the Motion, as soon as a Court Date is available
- Technical Review of Water Rights Transfers
- Status update on public outreach efforts

Motion carried unanimously by roll-call vote (5-0-0).

VI. **Board Member Comments**

Chair Bilyk called for comments. The Board discussed the following topics: 01:32:27

- Director Moran discussed the timeline for the Board to make a determination if the UCI GDE Study is "best available science" that can be relied upon for setting policy and adapting management actions.
- Directors Smith and Jorgensen provided a status update on the effort to contact private landowners about access for potential irrigation of mesquite trees on their property.

VII. **Next Meetings of the Borrego Springs Watermaster**

Chair Bilyk reviewed the meetings listed in the agenda package. 01:39:47

VIII. **Adjournment**

Chair Bilyk adjourned the meeting at 11:40 AM. 01:40:23

Recorded by:
Lauren Salberg, Staff Geologist, West Yost

Attest:
Gina Moran, Secretary of the Board

2:05 PM
06/15/26
Accrual Basis

Borrego Springs Watermaster
Profit & Loss for Fiscal Year 2025-2026
October 2025 through May 2026

	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	TOTAL
Ordinary Income/Expense									
Income									
DWR Grant Reimbursement [t]	0.00	0.00	0.00	263,282.30	0.00	0.00	0.00	0.00	263,282.30
Meter Read Reimbursement	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10,213.92	10,213.92
Pumping Assessment	0.00	175,024.32	0.00	0.00	0.00	0.00	0.00	175,024.32	350,048.64
Services Rendered	0.00	0.00	0.00	0.00	0.00	0.00	326.00	0.00	326.00
WY 2025 - Expected Grant Reimb [v]	0.00	0.00	0.00	(266,268.25)	0.00	0.00	0.00	0.00	(266,268.25)
Total Income	0.00	175,024.32	0.00	(2,985.95)	0.00	0.00	326.00	185,238.24	357,602.61
Expense									
Audit	0.00	161.00	0.00	6,489.00	0.00	1,662.00	225.00	0.00	8,537.00
Bank Service Charges	25.00	0.00	0.00	25.00	26.00	0.00	0.00	0.00	76.00
Consulting Services	78,630.25	69,187.07	40,445.00	61,329.45	59,958.10	25,460.05	85,185.76	50,330.41	470,526.09
Consulting Services- Meter Read	215.00	322.50	161.25	161.25	170.25	276.25	110.50	357.00	1,774.00
Insurance	3,946.02	3,946.02	3,946.02	3,946.02	3,946.02	3,946.02	3,946.02	3,945.97	31,568.11
Interest Expense	1,044.69	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,044.69
Legal	5,000.00	4,855.00	3,445.00	3,500.00	5,745.00	11,305.14	13,641.10	10,467.50	57,958.74
Meter Read Expenses	0.00	0.00	0.00	0.00	0.00	0.00	3,166.35	0.00	3,166.35
Total Expense	88,860.96	78,471.59	47,997.27	75,450.72	69,845.37	42,649.46	106,274.73	65,100.88	574,650.98
Net Ordinary Income	(88,860.96)	96,552.73	(47,997.27)	(78,436.67)	(69,845.37)	(42,649.46)	(105,948.73)	120,137.36	(217,048.37)
Net Income	**(88,860.96)**	**96,552.73**	**(47,997.27)**	**(78,436.67)**	**(69,845.37)**	**(42,649.46)**	**(105,948.73)**	**120,137.36**	**(217,048.37)**

t Reflects actual reimbursement received from DWR.

v Reflects reversal of estimated reimbursement amounts.

1:43 PM
06/15/26
Accrual Basis

Borrego Springs Watermaster
Balance Sheet for Fiscal Year 2025-2026
As of May 31, 2026

	May 31, 26
ASSETS	
Current Assets	
Checking/Savings	
US Bank	723,122.07
Total Checking/Savings	723,122.07
Accounts Receivable	
Accounts Receivable	189,060.35
Total Accounts Receivable	189,060.35
Other Current Assets	
Prepaid Expenses	28,634.31
Total Other Current Assets	28,634.31
Total Current Assets	940,816.73
TOTAL ASSETS	**940,816.73**
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable	166,211.22
Total Accounts Payable	166,211.22
Other Current Liabilities	
Accrued Payables	44,740.05
Total Other Current Liabilities	44,740.05
Total Current Liabilities	210,951.27
Total Liabilities	210,951.27
Equity	
Retained Earnings	946,913.83
Net Income	-217,048.37
Total Equity	729,865.46
TOTAL LIABILITIES & EQUITY	**940,816.73**

2:04 PM
06/15/26
Accrual Basis

Borrego Springs Watermaster
Expense Distribution Detail
May 2026

Type	Date	Num	Memo	Account	Amount
RWG Law					
Bill	05/31/2026	258932	Services rendered through May 31, 2026	Legal	10,467.50
Total RWG Law					10,467.50
West Yost & Associates					
General Journal	05/01/2026	135R	WY Estimate for April 1, 2026 to April 30, 2026	Consulting Services	(78,217.76)
General Journal	05/01/2026	135R	WY Estimate for April 1, 2026 to April 30, 2026	Consulting Services- Meter Read	(110.50)
Bill	05/30/2026	2067322	Services from April 1, 2026 to April 30, 2026	Consulting Services	84,165.12
Bill	05/30/2026	2067322	Services from April 1, 2026 to April 30, 2026	Consulting Services- Meter Read	110.50
General Journal	05/31/2026	136	WY Estimate for May 1, 2026 to May 31, 2026	Consulting Services	44,383.05
General Journal	05/31/2026	136	WY Estimate for May 1, 2026 to May 31, 2026	Consulting Services- Meter Read	357.00
Total West Yost & Associates					50,687.41
TOTAL					**61,154.91**

Borrego Springs Watermaster

Register: US Bank
From 05/01/2026 through 05/31/2026
Sorted by: Date, Type, Number/Ref

Date	Number	Payee	Account	Memo	Payment	C	Deposit	Balance
5/4/2026	2228	Borrego Water Dist	Accounts Payable	March 2026 Meter Reads	3,166.35			803,715.77
5/4/2026	2229	Inland Counties Insurance Services, Inc.	Accounts Payable	Insurance Coverage Period 05/19/2026-05/19/2027	28,634.31	X		775,081.46
5/4/2026	2230	RWG Law	Accounts Payable	Services rendered through February 28, 2026	8,805.14	X		766,276.32
5/4/2026	2231	West Yost & Associates	Accounts Payable	Services from February 1, 2026 to February 28, 2026	43,154.25	X		723,122.07

Borrego Springs Watermaster

Liquidity Summary for Fiscal Year 2025-2026

October 2025 to May 2026

Cash in Bank	$	723,122
Less: Accounts Payable	$	(166,211)
Less: Accrued Payables	$	(44,740)
Net Available Cash	**$**	**512,171**
Accounts Receivable	$	189,060
Prepaid Expenses	$	28,634
Adjusted Working Capital	**$**	**729,865**

Notes to Liquidity Summary

Supplemental schedule highlighting near-term liquidity.
Net Available Cash reflects cash less current payables and accrued liabilities (estimates).
Prepaid expenses (insurance premiums) are excluded because they are non-cash assets.
Accounts receivable are excluded from "Net Available Cash" due to collection timing variability.
Schedule is intended for internal board reporting only.

RWG LAW

T 213.626.8484
F 213.626.0078
Fed. I.D. No. 95-3292015

350 South Grand Avenue
37th Floor
Los Angeles, CA 90071

Approved June 19, 2026
by Jim Bennett

BORREGO SPRINGS WATERMASTER
C/O SAMANTHA ADAMS, EXECUTIVE DIRECTOR
WEST YOST
25 EDELMAN, SUITE 120
IRVINE, CA 92618

Invoice Date:	April 13, 2026
Invoice Num.:	257999
Matter Number:	13056-0001

Re: 13056-0001 GENERAL LEGAL SERVICES

For professional services rendered through March 31, 2026

Time Detail

Date	Initials	Description	Hours
03/02/26	JLM	REVIEW E-MAILS ON STAFF COST ON APPLICATION; REVIEW MATERIALS ON 5 YEAR UPDATE	1.50
03/03/26	JLM	REVIEW DOCUMENTS ON TECHNICAL RESPONSE TO DWR ARTICLES	0.80
03/03/26	SLF	E-MAILS FROM MR. MALONE REGARDING TAC MEETING AND ANNUAL REPORT	0.30
03/05/26	JLM	PREPARE MATERIALS FOR EVALUATION PROCESS; E-MAILS ON NOTICE PERIOD FOR EXHIBIT 1 UPDATE	2.30
03/06/26	JLM	COMPLETE AND PROVIDE EVALUATION MATERIALS TO MS. ADAMS	1.00
03/06/26	JCM	REVIEW NOTICE OF FIRM NAME CHANGE FOR GUPTA AND AYRES AND HAVE SERVICE LIST UPDATED ACCORDINGLY	0.10
03/09/26	JLM	REVIEW E-MAILS, REPORTS AND MEETING ON GDE STUDIES	2.30
03/10/26	JLM	REVIEW COUNTY INPUT ON GDES	0.60
03/11/26	SLF	REVIEW NOTICE OF MEETING AND TIME CHANGE; EXCHANGE E-MAILS WITH MR. MARKMAN REGARDING SAME	0.30
03/13/26	JLM	REVIEW UEI REBUTTAL REPORT ON GDE ISSUE; PHONE CALL ON STAFF EVALUATION	2.00

Client: BORREGO SPRINGS WATERMASTER
Matter: GENERAL LEGAL SERVICES

Invoice Date: April 13, 2026
Invoice Num.: 257999
Matter Number: 13056-0001

Date	Initials	Description	Hours
03/16/26	JLM	REVIEW BOARD MEETING AGENDA MATERIALS; REVIEW LETTER ON GDES	1.50
03/16/26	JCM	REVIEW E-MAIL AND DOCUMENTS REGARDING REQUEST FOR A PAYOFF DEMAND REGARDING 726 SAN PABLO ROAD; E-MAIL WITH MR. MARKMAN REGARDING SAME	0.20
03/17/26	JLM	RESPOND TO QUESTIONS ON LAND SALES; REVIEW 5TH ANNUAL REPORT	1.70
03/18/26	JLM	ATTEND BOARD MEETING; PHONE CALL TO MR. MCGLOTHLIN	3.30
03/24/26	JCM	REVIEW AND RESPOND TO E-MAIL FROM MS. SALBERG REGARDING LODGING ANNUAL REPORT	0.10
03/30/26	JCM	DRAFT AND FILE NOTICE OF LODGMENT OF ANNUAL REPORT FOR WATER YEAR 2025; E-MAIL WITH MS. SALBERG REGARDING SAME; COORDINATE SERVICE ON ALL PARTIES	0.60
03/31/26	JLM	REVIEW DOCUMENTS LODGING ANNUAL REPORT IN COURT	0.20
03/31/26	JCM	E-MAIL WITH MS. SALBERG AND MS. ADAMS REGARDING LODGING OF ANNUAL REPORT	0.10
Total			**18.90**

Timekeeper Summary

Name	Hours	Rate	Amount
JACOB C. METZ	1.10	275.00	302.50
JAMES L. MARKMAN	17.20	400.00	6,880.00
STEVEN L. FLOWER	0.60	350.00	210.00
Total	**18.90**		**$7,392.50**

Cost Detail

Date	Description	Amount
03/30/26	DUPLICATION PRINT ATTACHMENTS FROM AN EMAIL FOR J. METZ	39.30
03/31/26	POSTAGE 1 PACKAGE TO DANIEL LEE	13.30
Total		**$52.60**

Client: BORREGO SPRINGS WATERMASTER
Matter: GENERAL LEGAL SERVICES

Invoice Date: April 13, 2026
Invoice Num.: 257999
Matter Number: 13056-0001

CONFIDENTIAL

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Current Legal Fees.....$7,392.50
Current Client Costs Advanced.....$52.60

Total Current Fees and Costs.....$7,445.10

RWG LAW

T 213.626.8484
F 213.626.0078
Fed. I.D. No. 95-3292015

350 South Grand Avenue
37th Floor
Los Angeles, CA 90071

BORREGO SPRINGS WATERMASTER
C/O SAMANTHA ADAMS, EXECUTIVE DIRECTOR
WEST YOST
25 EDELMAN, SUITE 120
IRVINE, CA 92618

Invoice Date:	April 13, 2026
Invoice Num.:	257999
Matter Number:	13056-0001

Re: 13056-0001 GENERAL LEGAL SERVICES

For professional services rendered through March 31, 2026

Fees	7,392.50
Costs	52.60
Total Amount Due	**$7,445.10**

TERMS: PAYMENT DUE UPON RECEIPT

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE TO

RICHARDS, WATSON & GERSHON
350 South Grand Avenue, 37th Floor
Los Angeles, CA 90071

WEST YOST
Water. Engineered.

Remit Payment To:
PO Box 2158
Davis, CA 95617

March 31, 2026

Invoice Number: 2067148

Accounts Payable	Client Project:	Work Order No. 8
Borrego Springs Watermaster	WY Project No:	940-80-25-12
c/o West Yost Associates	Contract Amount:	584,376.00
25 Edelman, Suite 120	Job Name:	WY 2026 Admin and Technical Services
Irvine, CA 92618		

Professional Services from March 1, 2026 to March 31, 2026

Approved June 19, 2026 by Jim Bennett

Previously Billed :	**293,182.42**
Total This Period :	**50,102.00**
Total Amount Billed to Date including This Invoice :	**343,284.42**
Amount Remaining in Contract :	**241,091.58**

Task 101 Board Meetings

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	10.00	370.00	3,700.00	
Principal Eng/Scientist/Geologist II				
Malone, Andy	9.50	355.00	3,372.50	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	20.75	246.00	5,104.50	
Totals	40.25		12,177.00	
Total Labor				**12,177.00**
			Total this Task	**$12,177.00**

Task 120 TAC Meetings

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	.75	370.00	277.50	
Principal Eng/Scientist/Geologist II				
Malone, Andy	1.50	355.00	532.50	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	.75	246.00	184.50	
Totals	3.00		994.50	
Total Labor				**994.50**
			Total this Task	**$994.50**

Project	940-80-25-12	WY 2026 Admin and Technical Services	Invoice	2067148

Task 220 Insurance, Accounting, and Financial Services

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	.50	370.00	185.00	
Administrative IV				
Ehresman, Leah	.25	176.00	44.00	
Administrative III				
Mendoza-Tellez, Maria	10.25	160.00	1,640.00	
Totals	11.00		1,869.00	
Total Labor				**1,869.00**
		Total this Task		**$1,869.00**

Task 230 Outreach - Records, Docs, Website

Professional Personnel

	Hours	Rate	Amount	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	2.50	246.00	615.00	
Totals	2.50		615.00	
Total Labor				**615.00**
		Total this Task		**$615.00**

Task 240 Track/Respond to Public Communications & Requests

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	.25	370.00	92.50	
Principal Eng/Scientist/Geologist II				
Malone, Andy	.50	355.00	177.50	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	.50	246.00	123.00	
Totals	1.25		393.00	
Total Labor				**393.00**
		Total this Task		**$393.00**

Task 250 As-needed support to the BPA Parties

Professional Personnel

	Hours	Rate	Amount	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	2.50	246.00	615.00	
Totals	2.50		615.00	
Total Labor				**615.00**
		Total this Task		**$615.00**

Project	940-80-25-12	WY 2026 Admin and Technical Services	Invoice	2067148

Task 260 As-requested admin. of the Judgment, Rules & Regs, and GMP

Professional Personnel

	Hours	Rate	Amount	
Principal Eng/Scientist/Geologist II				
Malone, Andy	1.50	355.00	532.50	
Totals	1.50		532.50	
Total Labor				**532.50**
			Total this Task	**$532.50**

Task 270 General administration and project managements tasks

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	.75	370.00	277.50	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	3.25	246.00	799.50	
Totals	4.00		1,077.00	
Total Labor				**1,077.00**
			Total this Task	**$1,077.00**

Task 310 GWMP - Annual Meter Verification

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	.25	370.00	92.50	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	1.00	246.00	246.00	
Engineer/Scientist/Geologist II				
Kelty, Clay	6.00	221.00	1,326.00	
Totals	7.25		1,664.50	
Total Labor				**1,664.50**
			Total this Task	**$1,664.50**

Task 311 GWMP - Monthly Meter Reads

Professional Personnel

	Hours	Rate	Amount	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	2.00	246.00	492.00	
Totals	2.00		492.00	
Total Labor				**492.00**
			Total this Task	**$492.00**

Project 940-80-25-12 WY 2026 Admin and Technical Services Invoice 2067148

Task 320 GWMP - GWL and GWQ Mon

Professional Personnel

	Hours	Rate	Amount	
Engineer/Scientist/Geologist II				
Kelty, Clay	2.25	221.00	497.25	
Totals	2.25		497.25	
Total Labor				**497.25**
		Total this Task		**$497.25**

Task 330 DMS

Professional Personnel

	Hours	Rate	Amount	
Principal Eng/Scientist/Geologist II				
Malone, Andy	1.00	355.00	355.00	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	1.00	246.00	246.00	
Engineer/Scientist/Geologist II				
Kelty, Clay	.50	221.00	110.50	
Engineer/Scientist/Geologist I				
Serafin, Leslie	2.75	191.00	525.25	
Totals	5.25		1,236.75	
Total Labor				**1,236.75**
		Total this Task		**$1,236.75**

Task 341 WY 2025 Annual Report

Professional Personnel

	Hours	Rate	Amount	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	18.50	246.00	4,551.00	
Technical Analyst I				
Lang, Noelle	5.00	148.00	740.00	
Totals	23.50		5,291.00	
Total Labor				**5,291.00**
		Total this Task		**$5,291.00**

Task 350 As-needed support for implementation of the Judgment, Rules & Regs, and GMP

Professional Personnel

	Hours	Rate	Amount	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	3.00	246.00	738.00	
Totals	3.00		738.00	
Total Labor				**738.00**
		Total this Task		**$738.00**

Project 940-80-25-12 WY 2026 Admin and Technical Services Invoice 2067148

Task 380 5-Year GMP Assessment

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	13.25	370.00	4,902.50	
Principal Eng/Scientist/Geologist II				
Malone, Andy	10.00	355.00	3,550.00	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	22.25	246.00	5,473.50	
Technical Analyst I				
Lang, Noelle	14.00	148.00	2,072.00	
Totals	59.50		15,998.00	
Total Labor				**15,998.00**
		Total this Task		**$15,998.00**

Task 420 EWG Meetings and Address Ad Hoc Requests

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	.75	370.00	277.50	
Principal Eng/Scientist/Geologist II				
Malone, Andy	14.00	355.00	4,970.00	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	2.25	246.00	553.50	
Totals	17.00		5,801.00	
Total Labor				**5,801.00**
		Total this Task		**$5,801.00**

Task 500 Consulting services to Parties with manual-read meters

Professional Personnel

	Hours	Rate	Amount	
Engineer/Scientist/Geologist II				
Kelty, Clay	.50	221.00	110.50	
Totals	.50		110.50	
Total Labor				**110.50**
		Total this Task		**$110.50**
		Total this Invoice		**$50,102.00**

Description of Services:

Please see attached description of services

Project	940-80-25-12	WY 2026 Admin and Technical Services	Invoice	2067148

Outstanding Invoices

Number	Date	Balance
2066190	1/31/2026	60,775.35
2066530	2/28/2026	43,154.25
Total		**103,929.60**

Please direct questions to:

Project Manager Samantha Adams
Principal Greg Chung GKC

Description of Services Rendered
Project 940-80-25-12
Watermaster Administrative and Technical Services
Invoice Period: March 1, 2026 to March 31, 2026

TASK 1 – MEETINGS AND COURT HEARINGS

The work performed for this task includes preparing for and attending Watermaster Board Meetings, TAC Meetings, Court Hearings, and stakeholder Open House meetings. The work performed in this reporting period included:

BOARD MEETINGS

- Corresponded with Watermaster Board officers and legal counsel throughout the month to coordinate meeting agenda items and other Watermaster activities.
- March 2026 Regular Board Meeting:
    - Prepared meeting minutes from February 2026 Regular Board meeting.
    - Prepared, reviewed, and formatted agenda package content. This work included:
        - Organized, compiled, and formatted the public correspondence and consent calendar items.
        - Performed work, including coordination, preparation, and/or review of staff memos or other materials for eight agenda items.
    - Compiled the final agenda package and distributed via the stakeholder distribution list and Watermaster website.
    - Prepared PowerPoint Presentation to support the Board meeting discussion.
    - Responded to questions from Board members via email and phone calls regarding the Board package items.
    - Traveled to/from and attended the in-person Board meeting at the Borrego Water District on March 18, 2026. The meeting was attended by Samantha Adams, Andy Malone, and Lauren Salberg.
- April 2026 Regular Board Meeting:
    - Prepared punch list of action items for the Board meeting. Created meeting link and coordinated assignments for preparing the package.
    - Prepared draft meeting minutes from Regular March 2026 Board meeting and Special March 2026 Board meetings.

TAC MEETINGS

- Prepared response to comments document describing proposed responses to TAC members' feedback on the Sustainable Management Criteria (measurable objectives and interim milestones) for the chronic lowering of groundwater levels.
- Coordinated with TAC members to schedule a TAC working meeting for May 4, 2026.

- Scheduled TAC meeting for May 4, 2026, created meeting link, coordinated assignments for preparing the package, and prepared meeting agenda.

Court Hearings

- No work performed during the reporting period.

Stakeholder Outreach

- No work performed during the reporting period.

Task 2 – Watermaster Administration

The Executive Director, with support from staff, will organize, oversee, and/or perform the administrative and management aspects of running the Watermaster and administering the Judgment, Rules and Regulations, and GMP. The work performed in this reporting period included:

Prepare the Watermaster annual budget

- No work performed during the reporting period.

Insurance, Accounting, and Financial Services

- Prepared the February 2026 Financial Report.
- Prepared reporting estimates of February staff billings for inclusion in monthly financials.
- Processed accounts receivable and payable into QuickBooks.
- Cut checks for accounts payable and mailed for signature.
- Drove to US Bank to deposit checks.
- Supported finalization of the WY 2025 financial Audit, including coordinating with the Board Treasurer and communicating regularly with and providing information to the Auditors.
- Send follow-up reminders to a Pumper on outstanding payments owed on Pumping Assessments.
- At the direction of the Board, requested, received, and reviewed quotes for alternate insurance options. Coordinated with the Board Treasurer on quotes received.

Maintain Website and Grant Communications

- Maintained Watermaster website by updating meeting dates, meeting materials, and other documents.

Respond to and track public information requests

- Regularly checked Borrego inbox and provided general as-requested support to the public throughout the month by responding to emails on the following topics:
    - Water and sewer connections in Borrego Springs.
    - Filing and forwarding public correspondence letters received on the GDE Study Report.

As-needed support to the BPA Parties

- Fulfilled a data request for BWD and transmitted Borrego Valley Hydrologic Model (BVHM) files for all four projection scenarios.
- Calculated and summarized the maximum allowable Carryover that could be purchased by a Party to address Overproduction.

As-needed administration of the terms of the Judgment, Rules & Regulations, and Groundwater Management Plan

- Coordinated with the County of San Diego Department of Environmental Health and Quality (DEHQ), including: 1) an abandoned well in the North Management Area and establishing coordination for future abandoned well efforts, and 2) the next steps for two abandoned wells in the Basin after determining they are not good candidates for the monitoring network.

General administration and project managements tasks

- Performed monthly project management tasks including budget, schedule, and scope of work progress evaluations.

Task 3 – Technical Services

The objective of this task is for the Technical Consulting team to perform the technical services required by the Judgment, Rules and Regulations, and GMP for WY 2026. The work performed in this reporting period included:

Groundwater Pumping Monitoring - Annual Meter Verification

- Compiled and reviewed all meter test results to assess compliance with accuracy standards. Completed tracking sheet to document all meter test outcomes.
- Communicated with meter verification vendors to schedule Parties missing testing results.

Groundwater Pumping Monitoring - Monthly Collection and Processing of Meter Read Data

- Performed QA/QC of January and February 2026 monthly meter reads.

Groundwater Level and Quality Monitoring Program

- Began preparation and coordination for the spring 2026 semi-annual monitoring event.

Cooperator Data Collection, Data Management, and Reporting Data to DWR Portals

- Uploaded newly acquired well construction information for a well in the groundwater monitoring network (BSR-6) to HydroDaVE after receiving and confirming its well completion report.
- Processed groundwater-quality data from fall 2025 into GAMA-required format and submitted data to GAMA.

Annual Water Rights Accounting

- This task is complete.

Annual Report to the Court and DWR

- Finished preparing Appendix I of the Annual Report to document all verbal and written comments and the response to the comments.

- Updated the text, tables, figures, and appendices of the draft final WY 2025 Annual Report based on the comments received. Submitted it for editorial review. Addressed editorial review and published draft final report on March 4, 2026.
- Following approval of the WY 2025 Annual Report by the Board, finalized the Annual Report and posted it to the Watermaster website.
- Delivered report to RWG for submittal to the Court in compliance with the Judgment.
- Uploaded report and required data files to the DWR SGMA Portal.

As-needed technical support for implementation of the Judgment, Rules and Regulations, and Groundwater Management Plan

- Updated the TM on the BVHM results of Scenario 1A and resubmitted the TM to DWR to supersede the original TM submitted as a SGM grant deliverable.

Technical Work to Redetermine 2030 Sustainable Yield

- No work performed during the reporting period.

5-Year GMP Assessment/Update

The objective of this task is to prepare the 5-Year Groundwater Management Plan (GMP) Assessment/Update. The work performed in this reporting period included:

- Completed text, tables, figures, and appendices, of the administrative draft of the 5-Year GMP Assessment Report. Submitted for technical and editorial review. Updated report based on reviews.
- Completed text, tables, figures of the administrative draft of the 2026 GMP Update. Submitted for technical and editorial review. Updated report based on reviews.
- Prepared “Read Me” documents for both the 5-Year GMP Assessment Report and 2026 GMP Update to support Board review. Compiled and organized sections of the administrative draft reports in a OneDrive folder to facilitate Board review.
- Noticed the Board and distribution list of the publication of the administrative drafts of the 5-Year GMP Assessment Report and 2026 GMP Update on March 12, 2026.

Task 4 – Environmental Working Group

The objective of this task is to support the activities of the EWG in WY 2026. The work performed in this reporting period included:

At its Special November 3, 2025 meeting, the Board selected West Yost to perform the Peer Review of the UCI Groundwater Dependent Ecosystem (GDE) Study report. Work to advance the review of the report during this period included:

- Finalized meeting minutes from the February 26, 2026 joint TAC-EWG meeting based on TAC/EWG feedback, sent to distribution list and Watermaster Board, and posted to Watermaster website.
- Received, reviewed, and compiled feedback from TAC and EWG members on their review of the GDE Study Report.
- Prepared the draft TAC/EWG Recommendation Report on the GDE Study Report.
- Prepared for the joint TAC-EWG meeting to discuss the draft TAC/EWG Recommendation Report scheduled for April 8, 2026, including:

- Prepared the joint TAC-EWG agenda, memo, and agenda package and distributed to the TAC, EWG, and public distribution list via email.

Task 5 - Staff services Billed to Watermaster Related to Manual-Read Meters

The objective of this task is to coordinate the monitoring and collection of meter data from the parties with manual-read meters. This work is reimbursed by only those Parties with manual-read meters. The work performed in this reporting period included:

- Followed-up with Parties to submit February 2026 self-reporting of meter reads.

Party-Funded Requests for Information (RFI)

- There are no open requests for information.

RWG LAW

T 213.626.8484
F 213.626.0078
Fed. I.D. No. 95-3292015

350 South Grand Avenue
37th Floor
Los Angeles, CA 90071

Approved June 19, 2026
by Jim Bennett

BORREGO SPRINGS WATERMASTER
C/O SAMANTHA ADAMS, EXECUTIVE DIRECTOR
WEST YOST
25 EDELMAN, SUITE 120
IRVINE, CA 92618

Invoice Date: May 12, 2026
Invoice Num.: 258470
Matter Number: 13056-0001

Re: 13056-0001 GENERAL LEGAL SERVICES

For professional services rendered through April 30, 2026

Time Detail

Date	Initials	Description	Hours
04/01/26	JLM	REVIEW GAMON LETTER AND STAFF REPORT ON GDE ISSUE	2.00
04/01/26	SLF	REVIEW NOTICE REGARDING TAC/EWG MEETING	0.10
04/02/26	JLM	PHONE CALL ON IMPACT OF RECORDED JUDGMENT	0.40
04/02/26	JCM	REVIEW WATER YEAR 2025 ANNUAL REPORT	0.80
04/03/26	JCM	CONTINUE REVIEWING WATER YEAR 2025 ANNUAL REPORT	1.00
04/06/26	JLM	REVIEW AGENDA PACKET FOR TAC/EWG JOINT MEETING ON GDES	1.20
04/07/26	JLM	PROCESS EVALUATION FORMS; REVIEW NEWLY SUBMITTED COMMENTS ON GDES	2.00
04/08/26	JLM	ATTEND TAC/EWG MEETING ON GDE	1.80
04/08/26	SLF	REVIEW NOTICE REGARDING JOINT TAC/EWG MEETING	0.10
04/09/26	JLM	REVIEW SGMA AND REGULATION ON GDES; PHONE CALL TO MR. MCGLOTHLIN ON MOTION TO JOIN JUDGMENT	2.50
04/09/26	JCM	COMMUNICATIONS WITH MR. MARKMAN REGARDING APPLICATION FOR INTERVENTION	0.20
04/10/26	JLM	PROVIDE CLOSED SESSION TITLE FOR EVALUATION; REVIEW NEW MAIL ON GDES; RESEARCH ON GDE SGMA REQUIREMENTS	2.00

Client: BORREGO SPRINGS WATERMASTER
Matter: GENERAL LEGAL SERVICES

Invoice Date: May 12, 2026
Invoice Num.: 258470
Matter Number: 13056-0001

Date	Initials	Description	Hours
04/10/26	JCM	REVIEW NOTICE OF ENTRY OF ORDER GRANTING T2 TILTING T LLC'S APPLICATION FOR INTERVENTION	0.20
04/13/26	JLM	WORK ON EVALUATION; REVIEW BOARD MEETING AGENDA	1.70
04/13/26	SLF	REVIEW ADDENDUM TO BOARD AGENDA	0.10
04/14/26	JLM	COMPLETE EVALUATION DOCUMENTS; REVIEW NEW BUDGET MATERIALS FOR BOARD MEETING; PHONE CALL FROM MS. ADAMS ON CLOSED SESSION PROCESS	2.10
04/15/26	JLM	PREPARE FOR AND ATTEND BOARD MEETING	5.50
04/16/26	JLM	PHONE CALL TO MR. METZ ON GDE REGULATIONS; PHONE CALL TO MS. ADAMS ON PROCESSING JUDGMENT AMENDMENTS	0.80
04/16/26	JCM	PHONE CALL WITH MR. MARKMAN REGARDING GDE REGULATIONS	0.50
04/17/26	JLM	E-MAILS ON BROWN ACT ISSUES AND PUBLIC STATEMENTS; REVIEW NEW ARTICLES ON WATERMASTER	1.30
04/20/26	JLM	REVIEW GDE LETTER FROM MR. PETERSON; E-MAILS ON MEETING TO CONSIDER TRANSFER ISSUE	1.00
04/20/26	JCM	REVIEW AND RESPOND TO E-MAIL FROM MR. ANDERSON REGARDING ANNUAL REPORT	0.20
04/21/26	JLM	REVIEW E-MAILS ON TRANSFER ISSUE	1.20
04/22/26	JLM	REVIEW E-MAIL ON TRANSFER ISSUES	0.40
04/23/26	JLM	ATTEND MEETING ON TRANSFER OF PUMPING TO CENTRAL MANAGEMENT USE	1.20
04/27/26	JLM	PHONE CONFERENCE WITH MS. ADAMS ON TRANSFER	1.20
04/28/26	JLM	E-MAILS ON MEETING WITH STAFF ON TRANSFER	1.60
04/29/26	SLF	REVIEW NOTICE REGARDING TAC MEETING	0.10
04/30/26	JLM	REVIEW E-MAILS ON PERSONNEL ITEM; ATTEND MEETING WITH PUBLIC ON PLAN AMENDMENTS	1.90
Total			**35.10**

Client: BORREGO SPRINGS WATERMASTER
Matter: GENERAL LEGAL SERVICES

Invoice Date: May 12, 2026
Invoice Num.: 258470
Matter Number: 13056-0001

Timekeeper Summary

Name	Hours	Rate	Amount
JACOB C. METZ	2.90	275.00	797.50
JAMES L. MARKMAN	31.80	400.00	12,720.00
STEVEN L. FLOWER	0.40	350.00	140.00
Total	**35.10**		**$13,657.50**

Cost Detail

Date	Description	Amount
03/30/26	FIRST LEGAL NETWORK, LLC - ATTORNEY SERVICE - FILING/ORANGE CIVIL ELECTRONIC FILING	38.50
Total		**$38.50**

Client: BORREGO SPRINGS WATERMASTER
Matter: GENERAL LEGAL SERVICES

Invoice Date: May 12, 2026
Invoice Num.: 258470
Matter Number: 13056-0001

CONFIDENTIAL

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Current Legal Fees.....$13,657.50
Current Client Costs Advanced.....$38.50

Total Current Fees and Costs.....$13,696.00

RWG LAW

T 213.626.8484
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Fed. I.D. No. 95-3292015

350 South Grand Avenue
37th Floor
Los Angeles, CA 90071

BORREGO SPRINGS WATERMASTER
C/O SAMANTHA ADAMS, EXECUTIVE DIRECTOR
WEST YOST
25 EDELMAN, SUITE 120
IRVINE, CA 92618

Invoice Date:	May 12, 2026
Invoice Num.:	258470
Matter Number:	13056-0001

Re: 13056-0001 GENERAL LEGAL SERVICES

For professional services rendered through April 30, 2026

Fees	13,657.50
Costs	38.50
Total Amount Due	**$13,696.00**

TERMS: PAYMENT DUE UPON RECEIPT

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE TO

RICHARDS, WATSON & GERSHON
350 South Grand Avenue, 37th Floor
Los Angeles, CA 90071

WEST YOST
Water. Engineered.

Remit Payment To:
PO Box 2158
Davis, CA 95617

April 30, 2026

Invoice Number: 2067322

Accounts Payable	Client Project:	Work Order No. 8
Borrego Springs Watermaster	WY Project No:	940-80-25-12
c/o West Yost Associates	Contract Amount:	598,842.00
25 Edelman, Suite 120	Job Name:	WY 2026 Admin and Technical Services
Irvine, CA 92618		

Approved June 19, 2026 by Jim Bennett

Professional Services from April 1, 2026 to April 30, 2026

Previously Billed :	**343,284.42**
Total This Period :	**84,275.62**
Total Amount Billed to Date including This Invoice :	**427,560.04**
Amount Remaining in Contract :	**171,281.96**

Task 101 Board Meetings

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	11.75	370.00	4,347.50	
Principal Eng/Scientist/Geologist II				
Malone, Andy	6.00	355.00	2,130.00	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	24.50	246.00	6,027.00	
Totals	42.25		12,504.50	
Total Labor				**12,504.50**

Reimbursable Expenses

Mileage			173.28	
Total Reimbursables			**173.28**	**173.28**

Total this Task **$12,677.78**

Project 940-80-25-12 WY 2026 Admin and Technical Services Invoice 2067322

Task 120 TAC Meetings

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	5.50	370.00	2,035.00	
Principal Eng/Scientist/Geologist II				
Chiang, Eric	1.50	355.00	532.50	
Malone, Andy	6.00	355.00	2,130.00	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	8.25	246.00	2,029.50	
Totals	21.25		6,727.00	
Total Labor				**6,727.00**
			Total this Task	**$6,727.00**

Task 140 Stakeholder Outreach

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	7.75	370.00	2,867.50	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	10.75	246.00	2,644.50	
Administrative II				
Duncan, Caitlin	.50	133.00	66.50	
Technical Analyst I				
Lang, Noelle	1.50	148.00	222.00	
Totals	20.50		5,800.50	
Total Labor				**5,800.50**
			Total this Task	**$5,800.50**

Task 210 Prepare Watermaster Annual Budget for WY 2027

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	6.00	370.00	2,220.00	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	6.50	246.00	1,599.00	
Totals	12.50		3,819.00	
Total Labor				**3,819.00**
			Total this Task	**$3,819.00**

Project	940-80-25-12	WY 2026 Admin and Technical Services	Invoice	2067322

Task 220 Insurance, Accounting, and Financial Services

Professional Personnel

	Hours	Rate	Amount	
Administrative IV				
Ehresman, Leah	.50	176.00	88.00	
Administrative III				
Mendoza-Tellez, Maria	5.75	160.00	920.00	
Totals	6.25		1,008.00	
Total Labor				**1,008.00**
			Total this Task	**$1,008.00**

Task 230 Outreach - Records, Docs, Website

Professional Personnel

	Hours	Rate	Amount	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	.75	246.00	184.50	
Totals	.75		184.50	
Total Labor				**184.50**
			Total this Task	**$184.50**

Task 240 Track/Respond to Public Communications & Requests

Professional Personnel

	Hours	Rate	Amount	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	.25	246.00	61.50	
Totals	.25		61.50	
Total Labor				**61.50**
			Total this Task	**$61.50**

Task 250 As-needed support to the BPA Parties

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	1.75	370.00	647.50	
Totals	1.75		647.50	
Total Labor				**647.50**
			Total this Task	**$647.50**

Project	940-80-25-12	WY 2026 Admin and Technical Services	Invoice	2067322

Task 270 General administration and project managements tasks

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	.75	370.00	277.50	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	4.75	246.00	1,168.50	
Totals	5.50		1,446.00	
Total Labor				**1,446.00**
		Total this Task		**$1,446.00**

Task 310 GWMP - Annual Meter Verification

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	.25	370.00	92.50	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	1.50	246.00	369.00	
Engineer/Scientist/Geologist II				
Kelty, Clay	.50	221.00	110.50	
Totals	2.25		572.00	
Total Labor				**572.00**
		Total this Task		**$572.00**

Task 311 GWMP - Monthly Meter Reads

Professional Personnel

	Hours	Rate	Amount	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	.50	246.00	123.00	
Engineer/Scientist/Geologist II				
Kelty, Clay	7.75	221.00	1,712.75	
Totals	8.25		1,835.75	
Total Labor				**1,835.75**
		Total this Task		**$1,835.75**

Project 940-80-25-12 WY 2026 Admin and Technical Services Invoice 2067322

Task 320 GWMP - GWL and GWQ Mon

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	.50	370.00	185.00	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	2.00	246.00	492.00	
Engineer/Scientist/Geologist II				
Kelty, Clay	7.50	221.00	1,657.50	
Field Monitoring Services				
Kelty, Clay	57.00	145.00	8,265.00	
Serafin, Leslie	56.00	145.00	8,120.00	
Totals	123.00		18,719.50	
Total Labor				**18,719.50**

Subconsultants

Blaine Tech Services, Inc.		9,726.00	
Clinical Laboratory of San Bernardino, I		3,827.50	
Total Subconsultants		**13,553.50**	**13,553.50**

Reimbursable Expenses

Equipment, Supplies, Permits		44.09	
Total Reimbursables		**44.09**	**44.09**

Reimbursable Expenses (Units)

Field Vehicles (Groundwater)		2,000.00	
Precision Water Level Meter 500ft		160.00	
Precision Water Level Meter 700ft		225.00	
Transducer Communications Cable		50.00	
Turbidity Meter (2100Q Portable)		105.00	
Water Quality Meter		150.00	
Total Reimbursable Expenses (Units)			**2,690.00**

Total this Task **$35,007.09**

Task 330 DMS

Professional Personnel

	Hours	Rate	Amount	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	1.75	246.00	430.50	
Engineer/Scientist/Geologist II				
Kelty, Clay	8.50	221.00	1,878.50	
Totals	10.25		2,309.00	
Total Labor				**2,309.00**

Total this Task **$2,309.00**

Project 940-80-25-12 WY 2026 Admin and Technical Services Invoice 2067322

Task 370 2030 SYR - WY 2026 Scope

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	.50	370.00	185.00	
Principal Eng/Scientist/Geologist II				
Malone, Andy	9.00	355.00	3,195.00	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	7.25	246.00	1,783.50	
Totals	16.75		5,163.50	
Total Labor				**5,163.50**
			Total this Task	**$5,163.50**

Task 380 5-Year GMP Assessment

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	1.50	370.00	555.00	
Principal Eng/Scientist/Geologist II				
Malone, Andy	1.00	355.00	355.00	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	12.50	246.00	3,075.00	
Technical Analyst I				
Lang, Noelle	4.50	148.00	666.00	
Totals	19.50		4,651.00	
Total Labor				**4,651.00**
			Total this Task	**$4,651.00**

Task 420 EWG Meetings and Address Ad Hoc Requests

Professional Personnel

	Hours	Rate	Amount	
Eng/Scientist/Geologist Manager I				
Adams, Samantha	.25	370.00	92.50	
Principal Eng/Scientist/Geologist II				
Malone, Andy	5.00	355.00	1,775.00	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	.25	246.00	61.50	
Totals	5.50		1,929.00	
Total Labor				**1,929.00**
			Total this Task	**$1,929.00**

Project	940-80-25-12	WY 2026 Admin and Technical Services	Invoice	2067322

Task 500 Consulting services to Parties with manual-read meters

Professional Personnel

	Hours	Rate	Amount	
Engineer/Scientist/Geologist II				
Kelty, Clay	.50	221.00	110.50	
Totals	.50		110.50	
Total Labor				**110.50**
			Total this Task	**$110.50**

Task 600 RFI

Professional Personnel

	Hours	Rate	Amount	
Associate Eng/Scientist/Geologist I				
Salberg, Lauren	1.00	246.00	246.00	
Administrative III				
Mendoza-Tellez, Maria	.50	160.00	80.00	
Totals	1.50		326.00	
Total Labor				**326.00**
			Total this Task	**$326.00**
			Total this Invoice	**$84,275.62**

Description of Services:

Please see attached description of services

Outstanding Invoices

Number	Date	Balance
2067148	3/31/2026	50,102.00
Total		**50,102.00**

Please direct questions to:

Project Manager Samantha Adams
Principal Greg Chung GKC

Description of Services Rendered
Project 940-80-25-12
Watermaster Administrative and Technical Services
Invoice Period: April 1, 2026 to April 30, 2026

TASK 1 – MEETINGS AND COURT HEARINGS

The work performed for this task includes preparing for and attending Watermaster Board Meetings, TAC Meetings, Court Hearings, and stakeholder Open House meetings. The work performed in this reporting period included:

BOARD MEETINGS

- Corresponded with Watermaster Board officers and legal counsel throughout the month to coordinate meeting agenda items and other Watermaster activities.
- April 2026 Regular Board Meeting:
    - Prepared meeting minutes from March 2026 Regular Board meeting and two March 2026 Special Board meetings.
    - Prepared, reviewed, and formatted agenda package content. This work included:
        - Organized, compiled, and formatted the public correspondence and consent calendar items.
        - Performed work, including coordination, preparation, and/or review of staff memos or other materials for ten agenda items.
    - Compiled the final agenda package and distributed via the stakeholder distribution list and Watermaster website.
    - Prepared PowerPoint Presentation to support the Board meeting discussion.
    - Responded to questions from Board members via email and phone calls regarding the Board package items.
    - Attended the virtual Board meeting on April 15, 2026 (5.5 hour meeting). The meeting was attended by Samantha Adams, Andy Malone, and Lauren Salberg.
- May 2026 Regular Board Meeting:
    - Prepared punch list of action items for the Board meeting. Created meeting link and coordinated assignments for preparing the package.
    - Prepared draft meeting minutes from Regular April 2026 Board meeting.
- Enclosed expenses are for mileage for Watermaster staff travel to Borrego Springs for the in-person Regular Board meeting held on March 18, 2026.

TAC MEETINGS

- Coordinated with Board members per discussion at April Board meeting to prepare for TAC discussion on requested input for performing technical analysis of water rights transfers.
- Prepared the May 4, 2026 TAC agenda, memos, and final package and distributed to the TAC and public distribution list via email.
- Prepared PowerPoint Presentation to support the May 4, 2026 TAC working meeting.

COURT HEARINGS

- No work performed during the reporting period.

STAKEHOLDER OUTREACH

- Communicated with Legal Counsel on notification requirements.
- Scheduled Public Information Session to present the 5-Year GMP Assessment and 2026 GMP Update Reports.
- Prepared communications and published public draft reports.
- Prepared PowerPoint Presentation to support the April 30th Borrego Springs Watermaster Public Information Session on the draft 5-Year GMP Assessment and 2026 GMP Update Reports.
- Conducted virtual Public Information Session on April 30, 2026 from 1:30 pm to 3:15 pm. The Public Information Session was run by Samantha Adams and Lauren Salberg.
- Captured notes on questions and discussions held during the Public Information Session.

TASK 2 – WATERMASTER ADMINISTRATION

The Executive Director, with support from staff, will organize, oversee, and/or perform the administrative and management aspects of running the Watermaster and administering the Judgment, Rules and Regulations, and GMP. The work performed in this reporting period included:

PREPARE THE WATERMASTER ANNUAL BUDGET

- Began developing WY 2027 draft budget and scoping details for Board input.
- At the direction of the Board, prepared a cross-walk identifying DWR and Judgment requirements within the current scope of the Annual Report to identify which report sections are mandatory.

INSURANCE, ACCOUNTING, AND FINANCIAL SERVICES

- Prepared the March 2026 Financial Report.
- Prepared reporting estimates of April staff billings for inclusion in monthly financials.
- Processed accounts receivable and payable into QuickBooks.
- Cut checks for accounts payable and mailed for signature.
- At the direction of the Board completed application for updated insurance coverage renewal.

MAINTAIN WEBSITE AND GRANT COMMUNICATIONS

- Maintained Watermaster website by updating meeting dates, meeting materials, and other documents.

RESPOND TO AND TRACK PUBLIC INFORMATION REQUESTS

- Filed and forwarded public correspondence letters received.

AS-NEEDED SUPPORT TO THE BPA PARTIES

- Attended informational call on technical support services (funding) opportunities for small farmers and underrepresented communities that could potentially benefit farmers in the Basin.
- Held meetings to discuss Pumper questions on the draft 5-Year GMP Assessment and 2026 GMP Update reports.
- Discussed status of water rights transfer inquiry with an interested Party.

AS-NEEDED ADMINISTRATION OF THE TERMS OF THE JUDGMENT, RULES & REGULATIONS, AND GROUNDWATER MANAGEMENT PLAN

- No work performed during the reporting period.

GENERAL ADMINISTRATION AND PROJECT MANAGEMENTS TASKS

- Performed monthly project management tasks including budget, schedule, and scope of work progress evaluations.

TASK 3 – TECHNICAL SERVICES

The objective of this task is for the Technical Consulting team to perform the technical services required by the Judgment, Rules and Regulations, and GMP for WY 2026. The work performed in this reporting period included:

GROUNDWATER PUMPING MONITORING - ANNUAL METER VERIFICATION

- Performed QC of meter test results to assess compliance with accuracy standards.
- Notified Parties to complete testing if results not received.

GROUNDWATER PUMPING MONITORING - MONTHLY COLLECTION AND PROCESSING OF METER READ DATA

- Cataloged and processed March 2026 monthly meter reads.
- Calculated March pumping by well.
- Performed QA/QC of March 2026 pumping data.

GROUNDWATER LEVEL AND QUALITY MONITORING PROGRAM

- Printed field forms and all other instructions/documents for the Groundwater Monitoring Program semi-annual event. Updated the pre-route check-list, photos, maps, and contact sheet. Compiled all information into a field binder that is used by field technicians to execute the semi-annual monitoring program.
- Confirmed monitoring dates and times with well owners.
- Performed the Spring 2026 semi-annual field monitoring event in Borrego Springs from April 26 to April 30, 2026. This work included:
    - Mobilized to Borrego Springs with all equipment for monitoring.

- Visited 29 wells to collect water quality samples:
  - Collected groundwater quality samples from all 20 production wells in the current monitoring program. This work included documenting site conditions, collecting a static water level measurement (if possible), testing field parameters for stabilization, and filling sample bottles.
  - Supported the collection of water quality samples from 9 monitoring wells with Blaine Tech Support Services. This work included documenting site conditions, collecting a static water level measurement (if possible), testing field parameters for stabilization, and filling sample bottles. A water quality sample was retrieved from all 9 wells visited. New tubing was installed in two wells.
- Visited 19 wells with transducers installed to download the data, service the units (as needed), and reset them for continued recording.
- Visited 51 wells to collect manual water level readings – 50 wells were able to be monitored. This work included documenting site conditions and measuring (if possible) a static water level depth.
- Downloaded data from the Barologger installed in the BSR 6 well to compensate transducer measurements at all wells.
- Mobilized back to the West Yost Irvine office.

- Reimbursable expenses billed this period from the fall 2025 semi-annual monitoring event include:
  - Mileage for the field technicians to travel to and around Borrego Springs to perform monitoring event.
  - Purchase of field supplies.

COOPERATOR DATA COLLECTION, DATA MANAGEMENT, AND REPORTING DATA TO DWR PORTALS

- Began preparation of the summary of pumping for the first six months of WY 2026 and summary report of mid-year pumping.

ANNUAL WATER RIGHTS ACCOUNTING

- This task is complete.

ANNUAL REPORT TO THE COURT AND DWR

- This task is complete.

AS-NEEDED TECHNICAL SUPPORT FOR IMPLEMENTATION OF THE JUDGMENT, RULES AND REGULATIONS, AND GROUNDWATER MANAGEMENT PLAN

- No work performed during the reporting period.

TECHNICAL WORK TO REDETERMINE 2030 SUSTAINABLE YIELD

- This line-item is used to support the work under Task 4 - Environmental Working Group. See Task 4 for details of work performed in April 2026.

5-Year GMP Assessment/Update

The objective of this task is to prepare the 5-Year Groundwater Management Plan (GMP) Assessment/Update. The work performed in this reporting period included:

- Reviewed and cataloged all written Board comments received on the administrative draft 5-Year GMP Assessment Report and 2026 GMP Update circulated on March 11, 2026.
- Updated the text, tables, figures, and appendices of the administrative draft 5-Year GMP Assessment Report and 2026 GMP Update based on the Board comments received.

Task 4 – Environmental Working Group

The objective of this task is to support the activities of the EWG in WY 2026. The work performed in this reporting period included the following: (some of the time for the work referenced below is billed to task *TECHNICAL WORK TO REDETERMINE 2030 SUSTAINABLE YIELD,* the budget for which is also used to support this work):

- Prepared for the joint TAC-EWG meeting to discuss the draft TAC/EWG Recommendation Report scheduled for April 8, 2026, including:
    - Prepared the joint TAC-EWG agenda, memo, and final package and distributed to the TAC, EWG, and public distribution list via email.
    - Prepared PowerPoint Presentation to support the April 8, 2026 joint TAC-EWG working meeting.
    - Conducted the joint TAC-EWG meeting on April 8, 2026. The meeting was attended by Andy Malone and Lauren Salberg.
    - Prepared draft meeting minutes from the April 8, 2026 joint TAC-EWG meeting and emailed to TAC and EWG to request review of meeting minutes.
- Participated in a conference call with the authors of the UCI GDE Study Report.
- Reviewed model results to understand projected change in groundwater level elevations in the vicinity of the Mesquite Bosque.
- Reviewed and cataloged all TAC and EWG comments received on draft TAC-EWG Recommendation Report. Prepared the draft final TAC-EWG Recommendation Report and distributed to the TAC and EWG for their review.
- Communicated with the Board, TAC, and EWG on the schedule to complete the draft final TAC-EWG Recommendation Report.

Task 5 - Staff services Billed to Watermaster Related to Manual-Read Meters

The objective of this task is to coordinate the monitoring and collection of meter data from the parties with manual-read meters. This work is reimbursed by only those Parties with manual-read meters. The work performed in this reporting period included:

- Sent email notice to parties with manual read meters to send April 2026 self-reported meter reads.

Party-Funded Requests for Information (RFI)

- Completed a data request for historical groundwater-level data from select wells in the Basin. The data request was performed under a signed RFI with the University of California Irvine (UCI), which will be fully funded by UCI.

Order Summary

Order placed April 23, 2026 | Order # 114-7151683-1885863

Ship to

Thomas Clay Kelty
5203 GARNET ST
TORRANCE, CA 90503-2226
United States

Payment method

Visa ending in 3071

View related transactions

Order Summary

Item(s) Subtotal:	$39.99
Shipping & Handling:	$0.00
Total before tax:	$39.99
Estimated tax to be collected:	$4.10
Grand Total:	**$44.09**

Delivered April 25

Your package was left near the front door or porch.

RVMATE 4 Prong 30 Amp 15 Feet Generator Extension Cord, NEMA L14-30P/L14-30R, 125/250V Up to 7500W 10 Gauge SJTW Generator Cord, ETL Listed

Sold by: RVMATE

Return or replace items: Eligible through May 24, 2026

$39.99

BLAINE TECH SERVICES

INVOICE

1680 ROGERS AVE., SAN JOSE, CA 95112-1105
(408) 573-0555 FAX: (408) 573-7771 AR@blainetech.com
FED. EIN 77-0131-704 / CONTRACTOR'S LICENSE #746684

Send To

WEST YOST ASSOCIATES
ATTN: ACCOUNTS PAYABLE
2020 RESEARCH PARK DR, STE 100
DAVIS, CA 95618

Invoice Number
2BLJT-260427BA1

Invoice Date
May 4, 2026

Job Number / P.O. Number	Job Date(s)	Customer ID	Payment Terms	Due Date
940-80-25-12	4/27/26	737	Net 90 Days	8/2/26

Quantity	Item	Description	Unit Price	Extension
1.00	BBOR	BORREGO SPRINGS, CA / PM: SAMANTHA ADAMS / PO# 940-80-25-12 / TO# 15		
4.00	B216CB	PER DIEM	200.00	800.00
30.00	B114CB	TECHNICIAN/VEHICLE HOURLY RATE	135.00	4,050.00
30.00	B114CB	ASSISTANT TECHNICIAN/VEHICLE HOURLY RATE	115.00	3,450.00
1.00	B322CB	PROVIDE FLOW CELL: WEEKLY	300.00	300.00
800.00	B324CB	SAMPLE TUBING (PER FOOT)	0.72	576.00
4.00	B115CB	PROVIDE N2 TANKS	75.00	300.00
1.00	B115CB	PROVIDE ST1102 PUMP AND CONTROLLER	250.00	250.00

All sales taxes have been paid to the proper tax authorities.

PLEASE PAY THIS AMOUNT 9,726.00

Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329 San Bernardino, CA 92402

INVOICE

Invoice To:
West Yost Associates
Attn: West Yost Accounting-Invoicing
2020 Research Park Drive Site 100
Davis, CA 95618

Invoice Number
26E0058

Invoiced On:
05/14/26

Remit To:
Accounts Receivable
Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329
San Bernardino, CA 92402

PO Number

Received
05/01/26

Project
Borrego Springs

Client
Lauren Salberg
West Yost Associates

Terms
NET 30

Project Number
Semi-Annual Borrego Springs

Project Manager
Jeanette Hernandez

Work Order(s)
26E0058

Quantity	Analysis/Description	Matrix	Unit Cost	Extended Cost
Clinical Laboratory of San Bernardino				
4	Nitrite as N EPA 300.0 [8 day]	Water	$10.00	$40.00
4	General Mineral Panel [8 day]	Water	$105.00	$420.00
4	Arsenic EPA 200.8 [8 day]	Water	$12.50	$50.00
Additional Items				
1	Pickup Fee		$50.00	$50.00
			Invoice Total:	**$560.00**

Should you have any questions regarding invoice please contact Dolores Falcon

Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329 San Bernardino, CA 92402

INVOICE

Invoice To:
West Yost Associates
Attn: West Yost Accounting-Invoicing
2020 Research Park Drive Site 100
Davis, CA 95618

Invoice Number
26E0060

Invoiced On:
05/14/26

Remit To:
Accounts Receivable
Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329
San Bernardino, CA 92402

PO Number

Received
05/01/26

Project
Borrego Springs

Client
Lauren Salberg
West Yost Associates

Terms
NET 30

Project Number
Semi- Annual

Project Manager
Jeanette Hernandez

Work Order(s)
26E0060

Quantity	Analysis/Description	Matrix	Unit Cost	Extended Cost
Clinical Laboratory of San Bernardino				
2	Nitrite as N EPA 300.0 [8 day]	Water	$10.00	$20.00
1	Metals Digestion Fee [8 day]	Water	$20.00	$20.00
2	General Mineral Panel [8 day]	Water	$105.00	$210.00
2	Arsenic EPA 200.8 [8 day]	Water	$12.50	$25.00

Invoice Total: **$275.00**

Should you have any questions regarding invoice please contact Dolores Falcon

Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329 San Bernardino, CA 92402

INVOICE

Invoice To:
West Yost Associates
Attn: West Yost Accounting-Invoicing
2020 Research Park Drive Site 100
Davis, CA 95618

Invoice Number
26E0061

Invoiced On:
05/14/26

Remit To:
Accounts Receivable
Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329
San Bernardino, CA 92402

PO Number

Received
05/01/26

Project
Borrego Springs

Client
Lauren Salberg
West Yost Associates

Terms
NET 30

Project Number
Semi-Annual Borrego Springs

Project Manager
Jeanette Hernandez

Work Order(s)
26E0061

Quantity	Analysis/Description	Matrix	Unit Cost	Extended Cost
Clinical Laboratory of San Bernardino				
6	Nitrite as N EPA 300.0 [8 day]	Water	$10.00	$60.00
6	General Mineral Panel [8 day]	Water	$105.00	$630.00
6	Arsenic EPA 200.8 [8 day]	Water	$12.50	$75.00

Invoice Total: **$765.00**

Should you have any questions regarding invoice please contact Dolores Falcon

Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329 San Bernardino, CA 92402

INVOICE

Invoice To:

West Yost Associates
Attn: West Yost Accounting-Invoicing
2020 Research Park Drive Site 100
Davis, CA 95618

Invoice Number

26E0062

Invoiced On:

05/14/26

Remit To:

Accounts Receivable
Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329
San Bernardino, CA 92402

PO Number

Received

05/01/26

Project

Borrego Springs

Client

Lauren Salberg
West Yost Associates

Terms

NET 30

Project Number

Semi-Annual Borrego Springs

Project Manager

Jeanette Hernandez

Work Order(s)

26E0062

Quantity	Analysis/Description	Matrix	Unit Cost	Extended Cost
Clinical Laboratory of San Bernardino				
5	Nitrite as N EPA 300.0 [8 day]	Water	$10.00	$50.00
1	Metals Digestion Fee [8 day]	Water	$20.00	$20.00
5	General Mineral Panel [8 day]	Water	$105.00	$525.00
5	Arsenic EPA 200.8 [8 day]	Water	$12.50	$62.50

Invoice Total: **$657.50**

Should you have any questions regarding invoice please contact Dolores Falcon

Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329 San Bernardino, CA 92402

INVOICE

Invoice To:

West Yost Associates
Attn: West Yost Accounting-Invoicing
2020 Research Park Drive Site 100
Davis, CA 95618

Invoice Number

26E0064

Invoiced On:

05/14/26

Remit To:

Accounts Receivable
Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329
San Bernardino, CA 92402

PO Number

Received

05/01/26

Project

Borrego Springs

Client

Lauren Salberg
West Yost Associates

Terms

NET 30

Project Number

Semi-Annual Borrego Springs

Project Manager

Jeanette Hernandez

Work Order(s)

26E0064

Quantity	Analysis/Description	Matrix	Unit Cost	Extended Cost
Clinical Laboratory of San Bernardino				
5	Nitrite as N EPA 300.0 [8 day]	Water	$10.00	$50.00
5	General Mineral Panel [8 day]	Water	$105.00	$525.00
5	Arsenic EPA 200.8 [8 day]	Water	$12.50	$62.50

Invoice Total: **$637.50**

Should you have any questions regarding invoice please contact Dolores Falcon

Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329 San Bernardino, CA 92402

INVOICE

Invoice To:
West Yost Associates
Attn: West Yost Accounting-Invoicing
2020 Research Park Drive Site 100
Davis, CA 95618

Invoice Number
26E0065

Invoiced On:
05/14/26

Remit To:
Accounts Receivable
Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329
San Bernardino, CA 92402

PO Number

Received
05/01/26

Project
Borrego Springs

Client
Lauren Salberg
West Yost Associates

Terms
NET 30

Project Number
Semi-Annual Borrego Springs

Project Manager
Jeanette Hernandez

Work Order(s)
26E0065

Quantity	Analysis/Description	Matrix	Unit Cost	Extended Cost
Clinical Laboratory of San Bernardino				
3	Nitrite as N EPA 300.0 [8 day]	Water	$10.00	$30.00
1	Metals Digestion Fee [8 day]	Water	$20.00	$20.00
3	General Mineral Panel [8 day]	Water	$105.00	$315.00
3	Arsenic EPA 200.8 [8 day]	Water	$12.50	$37.50

Invoice Total: **$402.50**

Should you have any questions regarding invoice please contact Dolores Falcon

Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329 San Bernardino, CA 92402

INVOICE

Invoice To:

West Yost Associates
Attn: West Yost Accounting-Invoicing
2020 Research Park Drive Site 100
Davis, CA 95618

Invoice Number
26E0066

Invoiced On:
05/14/26

Remit To:
Accounts Receivable
Clinical Laboratory of San Bernardino, Inc.
P.O. Box 329
San Bernardino, CA 92402

PO Number

Received
05/01/26

Project
Borrego Springs

Client
Lauren Salberg
West Yost Associates

Terms
NET 30

Project Number
Semi-Annual Borrego Springs

Project Manager
Jeanette Hernandez

Work Order(s)
26E0066

Quantity	Analysis/Description	Matrix	Unit Cost	Extended Cost
Clinical Laboratory of San Bernardino				
4	Nitrite as N EPA 300.0 [8 day]	Water	$10.00	$40.00
1	Metals Digestion Fee [8 day]	Water	$20.00	$20.00
4	General Mineral Panel [8 day]	Water	$105.00	$420.00
4	Arsenic EPA 200.8 [8 day]	Water	$12.50	$50.00

Invoice Total: **$530.00**

Should you have any questions regarding invoice please contact Dolores Falcon

Borrego Springs Watermaster
Board of Directors Meeting
June 24, 2026
AGENDA ITEM IV.A

To: Board of Directors

From: Samantha Adams, Executive Director

Date: June 19, 2026

Subject: Consideration of Approval of the Draft Final 5-Year Assessment Report and 2026 GMP Update

✓ **Recommended Action**	☐ **Provide Direction to Staff**	☐ **Information and Discussion**
☐ **Fiscal Impact**	☐ **Cost Estimate: $**	

Recommended Actions

1) Approve the *Five-Year Assessment of the Judgment and Groundwater Management Plan for the Borrego Springs Subbasin* and *2026 Update to the Groundwater Management Plan for the Borrego Springs Subbasin* for submission to DWR and the Court.

2) Approve filing a motion with the Court to amend the Judgment to replace the current Exhibit 1, the *2020 Groundwater Management Plan for the Borrego Springs Subbasin,* with the *2026 Update to the Groundwater Management Plan for the Borrego Springs Subbasin*; and direct Legal Counsel to file the motion, with notice to all Parties, and schedule a hearing with the Court as soon as a Court date is available.

3) Approve the enclosed draft letter to DWR as proof of Watermaster approval of the subject documents, for signature by the Chair and Executive Director.

Fiscal Impact: None. The work is included in the approved, amended budget for WY 2026.

Regulatory Context

The Borrego Springs Subbasin (Basin) is managed under a court-approved Stipulated Judgment and Groundwater Management Plan (GMP), which together constitute the Physical Solution for achieving sustainable groundwater management under the Sustainable Groundwater Management Act (SGMA) as an Alternative Plan. The 2020 GMP is incorporated in the Judgment as Exhibit 1. As such, any changes to the GMP require an amendment to the Judgment to replace Exhibit 1 with an updated GMP.

On June 25, 2021, the Watermaster submitted the Judgment and GMP to the CA Department of Water Resources (DWR) as an Alternative Plan under SGMA. On February 25, 2025, DWR approved the Borrego Springs Alternative Plan. All Alternative Plans, including any changes made thereto, must be resubmitted to the DWR for re-evaluation every five years.

In its approval of the Alternative Plan, the DWR provided seven recommended corrective actions (RCAs) for Watermaster consideration, with the intent of enhancing the approach to achieve sustainability. The approval also provided a due date of June 25, 2026 for resubmission of the Alternative Plan and completion of the first "periodic evaluation", what has been referred to by Watermaster as the 5-Year Assessment of the GMP.

Agenda Item Purpose

The purpose of this agenda item is to:

- Present the revised draft final reports for the *Five-Year Assessment of the Judgment and Groundwater Management Plan for the Borrego Springs Subbasin* (5-Year Assessment Report) and *2026 Update to the Groundwater Management Plan for the Borrego Springs Subbasin* (2026 GMP Update) for consideration of approval.
- Receive direction on the next steps following the finalization of the reports.

The Draft Final Reports are available at the link provided via footnote.[1]

5-Year Assessment and GMP Update Process

Over the past year and a half, the Watermaster has been working to perform the 5-Year Assessment and update the 2020 GMP. This assessment and reporting effort involved evaluating current Basin conditions, incorporating new monitoring data and model projections into management considerations, evaluating the effectiveness of the management actions defined in the Judgment and GMP, addressing DWR's RCAs, and documenting activities over the reporting period. The process included facilitating Board, TAC, and stakeholder input through monthly workshops, TAC meetings, and public information sessions, all of which were open to the public.

The work has culminated in the preparation of two documents for submittal to the Court and DWR:

- **5-Year Assessment Report**, which evaluates Basin conditions, describes implementation progress, assesses progress toward achieving sustainability, and provides responses to the DWR's RCAs. Additionally, the 5-Year Assessment Report explains all the proposed updates to the 2020 GMP. The reporting period covered by the report is through September 30, 2025.
- **2026 GMP Update**, which incorporates Board-approved revisions to the 2020 GMP, all of which were recommended based on the 5-Year Assessment. All changes to the GMP are shown in redline text.

The process to review and finalize the reports included:

- On March 11, 2026, Staff published Administrative draft reports for Board input and feedback. Additionally, a Special Board Workshop was held on March 17 and 18 to provide the Board with an overview of the draft reports and solicit verbal feedback. Board members were then given time to submit any additional written comments.

[1] The Draft Final Reports are available at: https://westyost-my.sharepoint.com/:f:/p/lsalberg/IgBecmfxNgZJQKrdTxo5VkcwAeDnm7T5NN78UED5hwNeTvg?e=zgZAxu

- At the April 15, 2026 Board meeting, Staff presented recommended edits to the reports based on comments received from the Board and the Board approved the incorporation of Staff's recommended edits.
- On April 24, 2026, Staff published public review drafts of the two reports, inclusive of Board-approved edits, and noticed the Parties and interested stakeholders of the 30-day public comment period through May 26, 2026 and a public information session to learn about the documents.
- On April 30, 2026, a virtual public information session was held to support the public review process and accept comments on the reports.
- At the June 3, 2026 Special Board Meeting, Staff presented recommended edits to the 5-Year Assessment Report based on public comments received. No edits to the 2026 GMP Update were recommended. The Board approved the incorporation of Staff's recommended edits to the 5-Year Assessment Report and directed Staff to publish and notice the draft final reports.
- On June 12, 2026, Staff published the draft final reports, inclusive of the Board-approved edits based on public comments. A notice was also emailed to the Parties and interested stakeholders about the publication of the draft final reports and the Watermaster's intent to consider approval to amend the Judgment to replace the current Exhibit 1 (2020 GMP) with the 2026 GMP Update at its June 24, 2026 Special Board Meeting.

Overview of the Draft Final Reports

One minor change was made to the 2026 GMP Update since its public draft publication on April 24, 2026:

- Chapter 1 was updated to reflect corrected contact information and the mailing address of the Watermaster.

The following Board-approved changes were made to the 5-Year Assessment Report since its public draft publication on April 24, 2026:

- *Executive Summary* – Added *Table ES-2: Alternative Plan Periodic Evaluation Elements Guide,* which is the DWR-required crosswalk that maps the Alternative Plan (e.g. the Judgment and 2026 GMP Update) to the requirements of a Groundwater Sustainability Plan (GSP). The crosswalk was originally prepared in June 2021 for submittal of the original Court-approved Alternative Plan and was updated to reflect the new page numbers of the complied PDF of the Judgment and all of its exhibits, including the revised Exhibit 1 – 2026 GMP Update. Table ES-2 was prepared last because it had to include the exact page references of the compiled PDF document.
- *Chapter 1.4 – Process to Complete the Five-Year GMP Assessment* is a new subsection that summarizes the workshop/outreach process and timeline that was followed to prepare the draft reports.
- *Chapter 2.2.5 – Environmental Working Group* discussion was expanded to summarize the conclusions and recommendations contained in the UCI GDE Study Report, while

acknowledging that the report will be reviewed by Watermaster in accordance with its policy on Best Available Science.

- *Appendix D – Response to Public Comments* is a new appendix documenting public comments received and Watermaster responses.

Next Steps

Upon approval of the reports, next steps are:

- Remove the "unapproved" watermarks from the draft final documents and add any final edits directed by the Board.
- Create a "clean" copy of the 2026 GMP Update (no redline), a DWR requirement to submit alongside the redlined version.
- Upload the 5-Year Assessment Report, 2026 GMP Update (redline and clean versions) to the SGMA Portal by June 25, 2026. Additional information that is required with the upload includes:
    - A signed letter from the Watermaster verifying its approval of the documents. Once the formal Board meeting minutes are available in August, these will also be loaded. The draft letter is attached for your approval
    - Proof of notice of intent to adopt the 5-Year Assessment Report and 2026 GMP Update
    - Copies of, or links to, references cited in the 5-Year Assessment Report
    - Revised list of Representative Monitoring Wells per the 2026 GMP Update
- File motion with the Court to amend the Judgment (replace Exhibit 1 with the 2026 GMP Update) and request a Court date to hear the motion.

Staff is recommending the Board:

- Approve the 5-Year Assessment Report and 2026 GMP Update, with any final requested changes, and direct staff to file the reports with DWR and the Court.
- Approve filing a motion with the Court to amend the Judgment to replace the current Exhibit 1 with the 2026 GMP Update; and direct Legal Counsel to file the motion with the Court, with notice to all Parties, and schedule a hearing with the Court as soon as a Court date is available.
- Approve the enclosed draft letter to DWR as proof of Watermaster approval of the subject documents, for signature by the Chair and Executive Director.

Enclosures:

Draft Letter to DWR: *Watermaster Approval of the 5-Year Assessment Report for the Borrego Springs Subbasin and the 2026 Update to the Groundwater Management Plan for the Borrego Springs Subbasin*

Borrego Springs Watermaster

c/o West Yost • 25 Edelman, Suite 120 • Irvine, CA 92618

June 24, 2026

California Department of Water Resources
Sustainable Groundwater Management Office
P.O Box 942836
Sacramento, CA 94236-0001

Subject: ***Watermaster Approval of the 5-Year Assessment Report for the Borrego Springs Subbasin and the 2026 Update to the Groundwater Management Plan for the Borrego Springs Subbasin***

To Department of Water Resources Staff:

At its Special Board Meeting on June 24, 2026 the Borrego Springs Watermaster Board of Directors approved the following documents for the Borrego Springs Subbasin (Basin No. 7-024.01):

- 5-Year Assessment Report of the Judgment and Groundwater Management Plan for the Borrego Springs Subbasin (5-Year Assessment Report)
- 2026 Update to the Groundwater Management Plan for the Borrego Springs Subbasin (2026 GMP Update)

This letter is to verify proof of adoption of the subject reports. The Watermaster Board affirms that these documents were approved by the Board for submission to the DWR and constitute the Watermaster's periodic evaluation of the Basin's Alternative Plan pursuant to SGMA regulations. A motion will be filed with the Court on June 25, 2026 to amend the Judgment to replace the existing Exhibit 1 (2020 GMP), with the 2026 GMP Update. Approval of the amendment will be filed with DWR when it is received from the Court.

The June 24th Board meeting minutes documenting the Board's approval of these reports will be approved by the Board at its August 19, 2026 Board meeting. Once approved, the meeting minutes will be submitted to the DWR as additional proof of the Board's adoption of the Alternative Periodic Evaluation and 2026 GMP Update.

Please contact the Watermaster if you have any questions or require additional information regarding this submittal. We sincerely appreciate your time and consideration.

Respectfully,

Tyler Bilyk
Chairperson,
Borrego Springs Watermaster Board
TylerB@hassmgmt.com

Samantha Adams
Executive Director,
Borrego Springs Watermaster
sadams@westyost.com

Borrego Springs Watermaster
Board of Directors Meeting
June 24, 2026
AGENDA ITEM IV.B

To: Board of Directors

From: Samantha Adams, Executive Director

Date: June 19, 2026

Subject: Draft Proposed Transfer Restrictions Based on Technical Analysis of Data and BVHM Projections

☐ **Recommended Action**	✓ **Provide Direction to Staff**	☐ **Information and Discussion**
☐ **Fiscal Impact**	☐ **Cost Estimate: $**	

Recommended Action

Provide direction to Staff on next steps for finalizing a technically supported framework for imposing locational restrictions on transfers to facilitate Board review and action on transfer applications.

Fiscal Impact: TBD. Cost will depend on additional work requested by the Board. It should be noted there is limited available budget for additional technical analysis in WY 2026.

Judgment Context

Section III.I.(5) of the Judgment provides Watermaster with the responsibility to restrict transfers under specific conditions, stating:

> "*In order to protect the Basin and protect against Undesirable Results, the Watermaster, with input from the Technical Advisory Committee, may restrict Permanent Transfers and Leases to specific areas of the Basin based on reasonable, evidence-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.*"

This Judgment provision requires that Watermaster consult with the TAC prior to implementing restrictions on transfers. The TAC is established as the body responsible "…*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…*", as defined in Section I.A.58.

Section IV.E.9 further provides that the Borrego Valley Hydrologic Model (BVHM) "shall" be used (i.e., is required) "to support the implementation of this Judgment" as follows:

> *"The Watermaster shall use, among other available data, BVHM runs and best available records and data to support the implementation of this Judgment. Where actual records of data are not available, Watermaster shall rely on and use sound scientific and engineering estimates for the BVHM runs. Watermaster may use preliminary records of measurements,*

and, if revisions are subsequently made, Watermaster may reflect such revisions in subsequent accounting."

This provision establishes that Watermaster is required to rely on BVHM simulations and available data in making decisions, while also allowing for refinement and adjustment as new information becomes available.

Agenda Item Purpose

Staff is seeking Board direction on next steps needed to finalize guidelines for a technically supported framework for imposing locational restrictions on transfers. The draft framework presented to the TAC is enclosed. Input and direction to staff should be informed by TAC comments (attached and summarized herein), and any additional input from the Board.

Related Actions and Direction

- At its April 2026 meeting, the Board directed Staff to obtain input from the TAC on considerations for developing a framework to evaluate the potential impacts of transfers to inform the Board's review of applications.
- The TAC met on May 4th to discuss the Board's request for input and provided initial comments and questions on the concept of evaluating transfers.
- At its May 2026 meeting, the Board provided input and direction to Staff in response to TAC feedback and Board discussion, including:
    - The Board emphasized that projected chronic lowering of groundwater levels after 2040 is inconsistent with the Basin's sustainability goal, independent and regardless of conditions relative to minimum thresholds.
    - Given the cost, timing, and known model limitations, the Board requested that Staff first compare the pumping volumes and locations in the existing BVHM projection scenarios[1] to the distribution of Judgment-allowed pumping. This comparison is intended to determine whether the existing model scenarios provide enough information to support an initial transfer evaluation framework without immediately running an additional "Judgment Scenario".
    - The Board discussed equity in the context of transfer restrictions. A useful way to frame the issue is to consider the physical pumping capacity of different portions of the Basin. If the Basin has limited capacity to support additional pumping in an area, that capacity should not be made available on a first-come, first-served basis through individual transfers. Rather, the question becomes how available pumping capacity

[1] The existing BVHM projection scenarios include **Scenario 1A** (currently planned pumping as described by the major pumpers in the Basin) and **Scenarios 1B and 1C** (shifting projected pumping from the SMA/CMA to the NMA to better balance recharge/discharge across the Basin, and achieve relatively stable groundwater levels across the Basin after 2040). The volume of pumping in all scenarios is the same - the only difference between scenarios is *where* the water is pumped.

should be identified, preserved, and allocated in a manner that is equitable to pumpers affected by restrictions.

- The TAC met on June 10th to review Staff's proposed framework for locational transfer restrictions and the technical basis for the framework. The TAC had until 12:00 pm on July 19th to provide comments. Staff's memo and the TAC comments are enclosed herein.

Summary of Technical Conclusions and Implications for Transfers

The technical analysis described in Staff's enclosed memo to the TAC supports the following conclusions, in acknowledgement of the uncertainty and limitations of the BVHM that have been discussed at length with the Board and TAC and are described in relevant reports documenting the BVHM and its use.

- Pumping location materially affects whether groundwater levels will stabilize broadly across the Basin after 2040.
- The volume and distribution of pumping in the Central and South Management Areas (CMA and SMA) in Scenario 1A are projected to result in broad chronic lowering of groundwater levels in the southwestern portion of the Basin after 2040, which is not a sustainable outcome.
- Scenario 1B, which closely approximates the spatial distribution of Judgment-allowed pumping by Management Area, predicts continued groundwater-level declines in the southwestern portion of the Basin. This scenario pumps an average of approximately 590 afy less than Judgment-allowed Annual Allocation after 2040.
- Scenario 1C, which shifts more pumping to the northern portion of the Basin and reduces pumping in the central and southern portions, produces the most stable groundwater-level outcome after 2040.
- The northern portion of the Basin appears to have physical capacity to support greater volumes of pumping than the central and southern portions and thus accept some amount of BPA transfers from other areas of the Basin.
- Present-day groundwater-level stability in the CMA does not necessarily indicate future groundwater-level stability because current pumping in the CMA (1,966 af in WY 2025) is substantially lower than projected future pumping simulated in Scenario 1A (2,960 af in WY 2040). Additionally, future pumping in Scenario 1A assumes 765 af more pumping in the CMA in WY 2040 compared to a Judgment Scenario.

Taken together, the existing BVHM projection results indicate that the Basin's physical capacity to support pumping is not evenly distributed across the Basin and that the distribution of water rights in the Judgment is not optimally aligned to achieve a balance of recharge and discharge and highlights the need for the Watermaster to further explore PMA No. 6 to achieve sustainability in the Basin.

The analysis indicates that **there is no demonstrated capacity to increase the amount of BPA water rights in portions of the Central Management Area, nor in the South Management Area**. Allowing transfers of BPA into these areas would increase the Annual Allocation in these areas, which would be

expected to contribute to chronic lowering of groundwater levels beyond those projected under Scenario 1B, which occurs in a distribution of pumping that reasonably approximates Judgment rights.

Transfer Restriction Framework

Based on the technical findings described above, Staff presented the following transfer restriction framework to the TAC, that would apply to all forms of transfers subject to Watermaster approval: permanent transfers, temporary leases, and transfers of Carryover.

Staff delineated proposed Transfer Areas for purposes of applying transfer restrictions. The Transfer Areas are parcel-based and generally correspond to the northern, central, and southern portions of the Basin, but they do not exactly match the GMP Management Area boundaries. This distinction is intentional. The proposed Transfer Areas are intended to reflect the location of BPA parcels and the modeled groundwater-level response relevant to transfer review, rather than simply adopting existing GMP Management Area boundaries. The Transfer Areas should not be interpreted as new management areas or hydrogeologic subbasins. They are proposed as administrative areas for evaluating transfers based on current technical information.

The Transfer Areas were delineated considering:

- The location of BPA parcels
- The location of pumping wells included in the projection scenarios
- The groundwater-level response observed in the projection scenarios
- The objective of avoiding increased pumping capacity in areas where projected chronic groundwater-level declines occur

Figure 6 of the enclosed TAC memo shows the general boundaries of the three proposed Transfer Areas: Northern, Central, and Southern. The handful of parcels in the north-eastern corner of the CMA are included in the Northern Transfer Area and not in the Central Transfer Area to avoid concentrating BPA within the hydrologic CMA boundary to the south-western area of the Basin. Pumping is concentrated in the southwestern area in Scenarios 1A and 1B, which are projected to result in chronic lowering of groundwater levels after 2040.

Staff proposes the following initial framework to limit transfers of BPA, leases, and Carryover rights to occur only within the same Transfer Area:

- Transfers into the Southern Transfer Area from outside that area would not be allowed.
- Transfers into the Central Transfer Area from outside that area would not be allowed.
- Transfers into the Northern Transfer Area from outside that area would not be allowed.
- Transfers among parcels within the same Transfer Area would remain allowable, subject to all other Judgment requirements and review for localized impacts, including new well review and potential interference with nearby pumpers.

This framework would limit the need for additional technical analysis as transfer applications are received. The framework should be revisited and adapted as necessary when the Watermaster updates the BVHM and/or runs revised future pumping projections.

Summary of TAC Written Comments

Watermaster received written comments on the proposed interim transfer restriction framework from TAC representatives of the County of San Diego, Rams Hill/T2, BWD, and AAWARE. The comments identified areas of general alignment, open questions needing clarification, and technical concerns regarding the technical approach, as follows (commentors are identified as the Party they represent):

Areas of General Alignment

- There was general alignment that pumping location matters and should be considered when evaluating transfers.
- The County and AAWARE generally supported using existing BVHM results to inform an interim framework
- Rams Hill/T2 generally agreed that the existing BVHM results support several technical conclusions underlying the proposed framework, but recommended that a model run using adjudicated rights by location and quantity would increase confidence before the Board relies on the framework.
- The County, Rams Hill/T2, and AAWARE generally supported restrictions on transfers into the Central and Southern Transfer Areas.
- There was strongest alignment that transfers into the Southern Transfer Area warrant close scrutiny due to projected and observed groundwater-level concerns.
- Commenters generally recognized that the framework should be refined over time as additional data, modeling, and analysis become available.

Open Questions and Clarifications

- Several comments requested clarification on how the framework would apply to Carryover transfers, temporary leases, and transfer-specific review requests.
- Multiple commenters requested additional clarification on how the proposed Transfer Area boundaries were defined.
    - The County and Rams Hill/T2 specifically requested clarification on why certain northeastern CMA parcels were included in the Northern Transfer Area.
    - BWD requested broader technical justification for the proposed polygons
    - AAWARE noted that BPA parcels are not necessarily the only locations where water can be pumped and used, because BPA allocations may be transferred to other parcels as land is planted or developed.
- Comments differed on whether Scenario 1B is sufficient as an approximation of Judgment-allowed pumping:
    - The County supported using Scenario 1B for the interim framework
    - Rams Hill/T2 stated it is technically feasible but noted limitations and recommended a Judgement Scenario be analyzed

  - Rams Hill/T2 and AAWARE noted Scenario 1B underestimates Judgment-allowed pumping, which over time could add up to approximately 18,000 af of additional pumping from 2040 to 2070.
  - BWD disagreed that it is sufficient or whether additional modeling would improve confidence since a Judgement Scenario would reflect an average of 590 afy of additional pumping in 2040 and beyond.
- Comments raised questions about how available capacity to accept BPA transfers in the Northern Transfer Area from the Central or Southern Transfer Areas should be evaluated, preserved, or made available in the future.
  - County supported the Northern Transfer Area restriction as an interim measure while available northern capacity and potential PMA No. 6 implementation are further evaluated
  - BWD and AAWARE raised questions regarding northern capacity, subsurface flow, return flows, and potential effects on remaining NMA BPA holders
- BWD requested clarification on how the framework would incorporate adaptive management, how frequently it would be reevaluated, and whether transfer applicants could fund project-specific technical analysis.

Technical Concerns and Criticism

- BWD:
  - Raised concerns regarding reliance on the current BVHM results as the primary basis for broad transfer restrictions, emphasizing model uncertainty, residuals, projected climate assumptions, and BVHM limitations for evaluating localized transfer impacts.
  - Objected to using groundwater-level stability as a transfer review screen instead of relying primarily on minimum thresholds and undesirable results.
  - Recommended a case-by-case review process that allows applicants to submit additional information or fund transfer-specific technical analyses.
  - Raised concern about mention of PMA No. 6, noting the issue needs more explanation, and that the proposed transfer framework may effectively require initiation of PMA No. 6 and that Watermaster should provide additional information regarding how it will evaluate and support PMA No. 6.
- AAWARE:
  - Noted that BVHM projections are helpful as an initial indication, but not sufficient alone to reach a final conclusion without continued monitoring and data collection.
  - Raised concern that transferring water out of the NMA could reduce return flows and affect remaining NMA BPA holders, and recommended that transfer parties be responsible for mitigating impacts.
- BWD and AAWARE both raised concerns that transfer costs and transfer-specific analyses should be borne by the parties to the transfer, not the Watermaster budget.

Discussion and Next Steps

Staff is seeking direction from the Board on next steps to formalizing a technically-based framework for locational restrictions on transfers:

- Is additional technical analysis needed at this time?
- If no additional technical work is requested at this time, what changes are recommended to the framework?
- Does the Board want to provide responses to the TAC with respect to their questions/concerns?
- Do you want additional input from the TAC?
- How should the framework be formalized to support the Board's review of transfer applications? Board resolution or other mechanism?

Additional considerations for formulating input to Staff:

- There is insufficient time to perform and consider additional modeling results before the Watermaster is expected to receive and review transfer applications associated with Water Rights Accounting for WY 2026 (applications must be reviewed and taken action on by November).
    - If the Board determines that additional technical analysis is necessary before relying on the proposed framework, it should consider an interim approach to use for evaluating transfer applications for the WY 2026 Water Rights Accounting. The proposed framework could serve as a temporary policy to guide transfer reviews while additional modeling, monitoring, and analysis are completed.
- Performing additional modeling work would require a budget amendment (whether performed in WY 2026 or WY 2027).
- There is limited budget available to perform additional technical analysis and finalize a framework in WY 2026.
- Representatives of BWD (not the TAC member) inquired how the locational restrictions would impact the BWD's ability to transfer and use the BPA it owns on the former Bauer properties once it completes fallowing. Ideally, they would like to retain the flexibility of pumping at the location afforded to the BWD in the Judgment by using those rights at existing wells in the Northern Transfer Area (if this framework is adopted).

Staff will proceed with next steps as defined by the Board.

Enclosures

- June 5, 2026 Memo to TAC: *Request for TAC Input on Technical Analysis of Water Rights Transfer Restrictions*
- TAC Member Comments on June 5, 2026 Memo and June 10, 2026 TAC Meeting:
    - Jim Bennett, County of San Diego

- Tom Watson, Aquilogic - Representing Rams Hill
- Trey Driscoll, Intera - Representing BWD
- Leonardo Urrego-Vallowe – Representing AAWARE

Borrego Springs Watermaster
Technical Advisory Committee Meeting
June 10, 2026
AGENDA ITEM IV

To: Technical Advisory Committee (TAC)

From: Samantha Adams, Executive Director
Andy Malone, Technical Consultant

Date: June 5, 2026

Subject: Request for TAC Input on Technical Analysis of Water Rights Transfer Restrictions

TAC Meeting Objectives

The purpose of this agenda item is to obtain TAC input on the technical sufficiency of Watermaster Staff's analysis supporting an initial framework for evaluating and restricting transfers of water rights.

The Board has directed Staff to continue developing an approach for reviewing transfers that is grounded in the Judgment, supported by available technical information, and capable of being implemented in the near term. Staff has completed additional analysis using the existing BVHM projection scenarios, available pumping information, BPA parcel locations, and projected groundwater-level outcomes to evaluate whether restrictions on transfers are technically supported.

The TAC is being asked to focus its input on the technical basis for the proposed framework. Specifically, TAC input is requested on whether the existing technical analysis supports the physical conclusions used to develop the proposed Transfer Areas and proposed transfer restrictions, and whether there are technical flaws or additional analyses that should be addressed before the Board considers the framework.

The TAC is not being asked to evaluate the legal or policy merits of transfer restrictions. The requested input is limited to whether the technical analysis supports the physical conclusions used to develop the proposed framework.

Judgment Context

Section III.I.(5) of the Judgment provides Watermaster with the responsibility to restrict transfers under specific conditions, stating:

> "*In order to protect the Basin and protect against Undesirable Results, the Watermaster, with input from the Technical Advisory Committee, may restrict Permanent Transfers and Leases to specific areas of the Basin based on reasonable, evidence-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.*"

This Judgment provision requires that Watermaster consult with the TAC prior to implementing restrictions on transfers.

Section IV.E.9 further provides that the BVHM "shall" be used (i.e., is required) "to support the implementation of this Judgment" as follows:

> *"The Watermaster shall use, among other available data, BVHM runs and best available records and data to support the implementation of this Judgment. Where actual records of data are not available, Watermaster shall rely on and use sound scientific and engineering estimates for the BVHM runs. Watermaster may use preliminary records of measurements, and, if revisions are subsequently made, Watermaster may reflect such revisions in subsequent accounting."*

Together, these provisions establish the process and technical basis for evaluating whether transfers could cause or exacerbate undesirable results or interfere with the ability to achieve sustainability.

Background and Board Direction

At the May 4, 2026 TAC meeting, Watermaster Staff requested TAC input on the level and type of technical analysis needed to support Board decisions on transfer applications. TAC discussion identified several key issues, including how undesirable results should be interpreted in the context of transfers, whether the BVHM can evaluate small or incremental transfer impacts, whether additional model scenarios are needed, how to balance technical rigor with cost and timing, and how equity should be addressed if transfer restrictions are needed.

Staff summarized this TAC input for the Board at its May 20, 2026 meeting. The Board provided direction on several key topics that informed the additional technical analysis described in this memo:

1. The Board emphasized that projected chronic lowering of groundwater levels after 2040 is inconsistent with the Basin's sustainability goal. The Board direction was that Watermaster does not need to project a modeled exceedance of a minimum threshold before considering whether a transfer could contribute to an undesirable outcome. For purposes of transfer evaluation, projected chronic groundwater-level decline after 2040 would be sufficient to indicate a condition that is inconsistent with achieving and maintaining sustainability.
2. The Board considered whether Staff should develop and run a new BVHM scenario representing full exercise of pumping rights afforded under the Judgment (Judgment Scenario). Given the cost, timing, and known model limitations, the Board requested that Staff first compare the pumping volumes and locations in the existing BVHM projection scenarios[1] to the distribution of Judgment-allowed pumping. This comparison is intended to determine whether the existing model scenarios provide enough information to support an initial transfer evaluation framework without immediately running an additional Judgment Scenario.
3. The Board discussed equity in the context of transfer restrictions. Based on Board input, a useful way to frame the issue is to consider the physical pumping capacity of different portions of the Basin. If the Basin has limited capacity to support additional pumping in an area, that capacity should not be made available on a first-come, first-served basis through individual

[1] The existing BVHM projection scenarios include **Scenario 1A** (currently planned pumping as described by the major pumpers in the Basin) and **Scenarios 1B and 1C** (shifting of projected pumping from the SMA/CMA to the NMA to better balance recharge/discharge across the Basin, and achieve relatively stable groundwater levels across the Basin after 2040).

transfers. Rather, the question becomes how available pumping capacity should be identified, preserved, and allocated in a manner that is equitable to pumpers affected by restrictions.

Based on this direction, Staff performed additional analysis using existing BVHM results and technical information. The objective was to determine whether an initial transfer restriction framework can be technically supported without additional BVHM runs at this time.

Technical Approach

Staff evaluated the existing BVHM projection scenarios to determine whether they provide a sufficient technical basis to support transfer restrictions.

The analysis included the following components:

1. Mapping of BPA parcel locations and pumping well locations included in the model projections (Figure 1).
2. Comparison of the distribution of the 2040 Annual Allocation (Judgment Scenario) to projected pumping by management area for each BVHM scenario over the 2040 to 2070 period (Table 1).
3. Comparison of WY 2025 pumping to the 2040 Annual Allocation and the projected average pumping from 2040 to 2070 by management area for each BVHM scenario (Figure 2).
4. Evaluation of projected groundwater-level changes from 2040 to 2070 at well calibration points and representative monitoring wells in Scenarios 1A, 1B, and 1C (Figures 3a, 3b, and 3c).
5. Evaluation of projected groundwater-level changes from 2040 to 2070 across the BVHM model grid in Scenarios 1A, 1B, and 1C (Figures 4a, 4b, and 4c).
6. Comparison of projected groundwater-elevations in 2070 between Scenario 1A and Scenario 1C to evaluate the physical effect of shifting pumping northward (Figure 5).

Spatial Terminology Used in this Analysis. This memo uses three related but distinct spatial references: GMP Management Areas, general geographic descriptions of Basin response, and proposed Transfer Areas. The GMP Management Areas are the formal North, Central, and South Management Areas defined in the GMP. Staff used the GMP Management Areas as a practical summary scale for comparing Judgment-allowed pumping to modeled pumping in Scenarios 1A, 1B, and 1C because the existing pumping and model-output summaries were already organized at that scale.

The use of GMP Management Areas for this comparison should not be interpreted to mean that the proposed transfer restrictions are based solely on the GMP Management Area boundaries. Throughout the discussion of model results, Staff also refers more generally to the “northern,” “central,” “southern,” or “southwestern” portions of the Basin to describe broad spatial patterns in projected groundwater-level changes. These descriptions are intended to explain the BVHM results and are not proposed regulatory boundaries.

The proposed “Transfer Areas” described herein are different from both of the above references. The Transfer Areas are parcel-based areas proposed for purposes of applying transfer restrictions. They generally correspond to the northern, central, and southern portions of the Basin, but they do not

exactly match the GMP Management Area boundaries. The Transfer Areas were delineated based on the location of BPA parcels, modeled pumping wells, and the groundwater-level responses shown in the BVHM projection scenarios. They are not intended to create new GMP Management Areas or hydrogeologic subareas.

Technical Analysis

The analysis below is presented in acknowledgement of the uncertainty and limitations of the BVHM that have been discussed at length with the Board and TAC and that are described in relevant reports documenting the BVHM and its use.

Comparison of Judgment-Allowed Pumping to Modeled Pumping. Table 1 compares the Annual Allocation[2] available in 2040 to the average annual volume of pumping simulated in Scenarios 1A, 1B, and 1C for 2040 to 2070. The Annual Allocation and pumping are summarized by GMP Management Area (North, Central, and South) based on the location of the BPA parcels to which rights are assigned (see parcel locations in Figure 1). For purposes of this comparison, the Borrego Water District's entire Annual Allocation is assigned to the Central Management Area because BWD's rights are not assigned to a fixed BPA parcel in the same manner as other BPA holders, the majority of BWD's historical pumping has occurred in the central portion of the Basin, and the current wells in this area have the capacity to pump the full Annual Allocation.

Figure 2 presents the same information graphically, with the colored bars showing pumping by BVHM scenario and Management Area, along with WY 2025 pumping and the 2040 Annual Allocation.

The purpose of this comparison was to answer the Board's question: how does pumping in the existing BVHM projection scenarios compare to the distribution of pumping allowed under the Judgment? The comparison shows the following:

- Scenario 1A includes 766 acre-feet per year (afy) more pumping in the Central Management Area than the Judgment-allowed distribution of Annual Allocation. Pumping in the North and South Management Areas is 1,140 and 208 afy less than the Annual Allocation, respectively.
- Scenario 1B has a distribution of pumping across the Basin that is most similar to the distribution of Judgment-allowed pumping: in each Management Area, pumping is about 200 afy less than the Annual Allocation.
- Scenario 1C includes 762 afy more pumping than the Judgment-allowed distribution in the North Management Area, and 736 and 608 afy less pumping in the Central and South Management Areas.
- WY 2025 pumping relative to projected pumping in Scenario 1A from 2040 to 2070 is:
    - Substantially higher in the North Management Area (i.e., planned future pumping is decreasing)
    - Substantially lower in the Central Management Area (i.e., planned future pumping is increasing)

[2] Annual Allocation is the amount of pumping allowed based on BPA rights and the Rampdown percentage for a given year. For 2040 and beyond the Annual Allocation is equal to the Sustainable Yield.

- Slightly higher in the South Management Area (i.e., planned future pumping is decreasing)

The difference in planned pumping volumes in Scenario 1A compared to the present in the Central Management Area is notable. It highlights that current groundwater-level stability in the Central Management Area cannot be relied upon as evidence, on its own, to conclude that future groundwater levels will remain stable.

The comparison presented in Table 1 and Figure 2 is important because it demonstrates that the existing projection scenarios provide useful information about Basin responses under different pumping distributions. Scenario 1B is particularly relevant because the distribution of projected pumping volumes reasonably approximates the spatial distribution of Judgment-allowed pumping by Management Area, even though it is not a true Judgment Scenario.

BPA Parcel and Pumping Well Locations. Figure 1 shows the location of BPA parcels and the wells with simulated pumping in Scenarios 1A, 1B, and 1C. The figure also identifies the additional northern wells used in Scenarios 1B and 1C to evaluate the effect of shifting pumping northward from the Central and South Management Areas. This map provides important context for interpreting the pumping distribution analysis. It shows where water rights are assigned and how those locations compare to the wells used in the projection scenarios.

In general, the modeled pumping locations are reasonably aligned with the location of BPA parcels. However, there are exceptions. For example, some BPA parcels in the northeastern corner of the Central Management Area do not have corresponding modeled pumping wells in the projection scenarios. This means the existing scenarios do not precisely replicate a full Judgment Scenario. However, when considered together with the Management Area pumping comparison, Scenario 1B provides a reasonable approximation of the Judgment-allowed pumping distribution for purposes of evaluating Basin response under existing BVHM results.

This figure is not intended to provide an independent technical conclusion. Rather, it supports transparency regarding how modeled pumping locations compare to the location of water rights.

Groundwater-Level Change from 2040 to 2070. This period is important because the Judgment requires rampdown to the Sustainable Yield by 2040. Therefore, groundwater-level changes after 2040 provide an indication of whether groundwater levels are projected to stabilize after implementation of the Physical Solution.

Figures 3a, 3b, and 3c are maps that show groundwater-level changes from 2040-2070 at well locations for Scenarios 1A, 1B, and 1C respectively. The wells are those used in model calibration (pumping and monitoring wells) and the representative monitoring wells in Watermaster's groundwater monitoring network. The maps use color to show the direction of change and symbol size to show magnitude of change. Blue symbols indicate groundwater-level increases from 2040 to 2070, and red symbols indicate groundwater-level declines from 2040 to 2070. Smaller, lighter symbols indicate changes closer to zero. For purposes of this analysis, changes between approximately -5 feet and +5 feet from 2040 to 2070 are interpreted as generally stable, recognizing that groundwater levels will vary over time due to climatic variability and other factors.

Figures 4a, 4b, and 4c show the same type of information across the BVHM model grid. These model-grid maps show model-calculated groundwater-level change from 2040 to 2070 across grid cells

where groundwater is present. The maps provide a basin-wide view of the spatial pattern of groundwater-level change under each BVHM scenario.

For reference, the Mesquite Bosque is shown on all maps as a reference feature because it is an area where projected groundwater-level change is of particular interest.

- **Scenario 1A Results.** Scenario 1A represents the estimate of planned future pumping based on input from existing pumpers as of late 2024. The results show a strong contrast between the northern and southern portions of the Basin. In the northern portion of the Basin, groundwater levels are projected to generally increase from 2040 to 2070, in most areas by ten feet or more. In the southern portion of the Central Management Area and in the South Management Area, groundwater levels are projected to continue to decline after 2040. The area of decline is concentrated in the southwest.

  The projected declines are not isolated to a single well. The maps show broad areas of decline in the southwestern area of the Basin, where most pumping in the central and southern areas occurs. In the South Management Area, projected declines are on the order of 20 feet to more than 35 feet in some locations. In the Central Management Area, declines are generally smaller but still broadly distributed, commonly in the 5-20 foot range. The eastern portion of the southern Basin, including the area underlying the Mesquite Bosque, shows smaller changes and is generally closer to the stable range.

  The technical conclusion from Scenario 1A is that future planned pumping does not result in basin-wide sustainability. The results predict broad areas of chronic lowering of groundwater levels across the southwestern portion of the Basin.

- **Scenario 1B Results.** Scenario 1B shifts an average of 920 afy of projected pumping northward from the Central Management Area relative to Scenario 1A, and as described above, produces a distribution of pumping that is most similar to the distribution of Judgment-allowed pumping by management area. The results show a similar spatial pattern of increases and decreases of projected groundwater levels relative to Scenario 1A, but with reduced magnitudes of change. Groundwater-level increases in the northern portion of the Basin are smaller, generally about five to ten feet of increase. Projected declines in the central and southern portions of the Basin are also somewhat reduced, but they are not eliminated.

  Continued groundwater-level declines during 2040 to 2070 are still projected in Scenario 1B in the southwestern areas of the Basin. The eastern portion of the southern Basin, including the area underlying the Mesquite Bosque, is not materially different relative to Scenario 1A.

  The technical conclusion from Scenario 1B is important because this scenario most closely approximates the spatial distribution of Judgment-allowed pumping. Even under this pumping distribution, groundwater levels continue to decline in the southern half of the Basin after 2040. This indicates that a pumping distribution similar to the Judgment-allowed allocation may not fully achieve groundwater-level stabilization in all areas of the Basin.

- **Scenario 1C Results.** Scenario 1C shifts an average of 1,876 afy of projected pumping northward from the Central and South Management Areas relative to Scenarios 1A. Scenario 1C produces the most stable groundwater-level outcome of the three BVHM scenarios. Most wells across the Basin show groundwater-level changes within the approximate stable range

of +/-5 feet from 2040 to 2070. Conditions in the South Management Area improve substantially relative to Scenarios 1A and 1B. Conditions in the Central Management Area demonstrably improve, with most areas showing only small changes in groundwater levels from 2040 to 2070. There is one localized area of decline in the Central Management Area. However, the declines are much more limited in spatial extent and magnitude and do not resemble the broad pattern of continued groundwater-level declines predicted in Scenarios 1A and 1B.

The technical conclusion from Scenario 1C is that shifting pumping toward the northern portion of the Basin produces the most stable groundwater-level outcome across the Basin. Scenario 1C suggests that pumping would need to occur in a distribution that is different than that of the Judgment rights to achieve sustainability. The intra-Basin conveyance project conceptualized in Project and Management Action (PMA) No. 6 of the GMP was identified, in part, to address such an issue.

Scenario 1C Minus Scenario 1A Difference Map. Figure 5 compares 2070 groundwater elevations in Scenario 1C to those in Scenario 1A. This figure shows the physical effect of shifting pumping from the central and southern portions of the Basin toward the northern portion of the Basin. The difference map shows that groundwater levels are projected to be higher under Scenario 1C across broad areas of southwestern area of the Basin, with improvements of 30 to 50 feet in some locations. These improvements occur in the same general areas where Scenario 1A shows the largest continued groundwater-level declines.

The map also shows that groundwater levels are lower in the northern portion of the Basin under Scenario 1C than under Scenario 1A, generally on the order of approximately 10 feet. However, this reduction is not interpreted as an undesirable outcome because groundwater levels in the northern portion of the Basin were increasing by 10-20 feet under Scenario 1A.

This figure demonstrates that shifting pumping northward as simulated in Scenario 1C produces a measurable groundwater-level benefit in areas where chronic declines are projected in Scenarios 1A and 1B, while still maintaining generally stable conditions in the northern portion of the Basin.

Summary of Technical Conclusions and Implications for Transfers

The technical analysis described above supports the following conclusions:

- Pumping location materially affects whether groundwater levels will stabilize broadly across the Basin after 2040.
- The volume and distribution of pumping in the Central and South Management Areas in Scenario 1A are projected to result in broad chronic lowering of groundwater levels in the southwestern portion of the Basin after 2040, which is not a sustainable outcome.
- Scenario 1B, which closely approximates the spatial distribution of Judgment-allowed pumping by Management Area, predicts continued groundwater-level declines in the southwestern portion of the Basin.
- Scenario 1C, which shifts more pumping to the northern portion of the Basin and reduces pumping in the central and southern portions, produces the most stable groundwater-level outcome after 2040.

- The northern portion of the Basin appears to have greater physical capacity to support greater volumes of pumping than the central and southern portions.
- Current groundwater-level stability does not necessarily indicate future groundwater-level stability because current pumping is substantially lower than projected future pumping simulated in the BVHM scenarios.

Taken together, the existing BVHM projection results indicate that the Basin's physical capacity to support pumping is not evenly distributed across the Basin and that the distribution of water rights in the Judgment is not optimally aligned to achieve a balance of recharge and discharge and highlights the need for the Watermaster to further explore PMA No. 6 to achieve sustainability in the Basin.

The analysis indicates that **there is no demonstrated capacity to increase the amount of BPA water rights in portions of the Central Management Area, nor in the South Management Area**. Allowing transfers of BPA into these areas would increase the Annual Allocation in these areas, which would be expected to contribute to chronic lowering of groundwater levels beyond those projected under a distribution of pumping that reasonably approximates Judgment rights.

The northern portion of the Basin appears to have capacity to support additional pumping, given that pumping in Scenario 1C exceeds the Judgment-allowed distribution of rights in that area but still yields a sustainable outcome. That said, given there is a potential that pumpers in the southern area of the Basin may need to rely on a future shift in pumping to the north to access their full water rights, such as envisioned by the intra-basin conveyance project in PMA No. 6, the available capacity in the north should not be treated as generally available transfer capacity. Additional technical analysis would be needed to determine the optimal northward pumping shift, the available capacity for transfers into the north, and how that capacity would be equitably allocated to affected pumpers.

Proposed Transfer Areas

Based on the technical findings described above, Staff has delineated proposed Transfer Areas for purposes of applying transfer restrictions. The Transfer Areas are parcel-based and generally correspond to the northern, central, and southern portions of the Basin, but they do not exactly match the GMP Management Area boundaries. This distinction is intentional. The proposed Transfer Areas are intended to reflect the location of BPA parcels and the modeled groundwater-level response relevant to transfer review, rather than simply adopting existing GMP Management Area boundaries.

The Transfer Areas were delineated considering:

- The location of BPA parcels
- The location of pumping wells included in the projection scenarios
- The groundwater-level response observed in the projection scenarios
- The objective of avoiding increased pumping capacity in areas where projected chronic groundwater-level declines occur

Figure 6 shows the general boundaries of the three proposed Transfer Areas: Northern, Central, and Southern. The Transfer Areas should not be interpreted as new management areas or hydrogeologic subbasins. They are proposed as administrative areas for evaluating transfers based on current technical information.

Staff proposes the following initial framework to limit transfers of BPA, leases, and Carryover rights to occur only within the same Transfer Area:

- Transfers into the Southern Transfer Area from outside that area would not be allowed.
- Transfers into the Central Transfer Area from outside that area would not be allowed.
- Transfers into the Northern Transfer Area from outside that area would not be allowed.
- Transfers among parcels within the same Transfer Area would remain allowable, subject to all other Judgment requirements and review for localized impacts, including new well review and potential interference with nearby pumpers.

The technical rationale for restricting transfers into the Central and Southern Transfer Areas is that existing model results show continued groundwater-level declines in portions of those areas after 2040 under pumping volumes that are comparable to, or less than, the Judgment-allowed distribution of rights as summarized by GMP Management Area in Table 1 and Figure 2. Based on those results, additional BPA, leased allocation, or Carryover available for pumping in those areas would be expected to contribute to projected chronic lowering of groundwater levels after 2040.

The rationale for restricting transfers into the Northern Transfer Area is different. The BVHM projection results indicate that the northern portion of the Basin has greater physical capacity to support pumping. However, the amount of available capacity has not yet been quantified or allocated, and that capacity may be needed in the future to support a basin-wide solution for parties whose rights are assigned to areas where pumping their allocated rights is not sustainable.

The proposed framework is intended to support near-term transfer review while allowing for future refinement. Additional technical analysis is expected to occur as part of future BVHM updates and the 2030 Sustainable Yield redetermination process. This initial framework could be revisited and modified by the Board as new data, updated model results, and additional pumping projections become available.

TAC Input Requested

Watermaster is requesting TAC input on the technical sufficiency of the analysis relied upon to develop the proposed transfer restriction framework. Specifically, TAC input is requested on the following questions:

1. Do the existing BVHM projection results provide a sufficient technical basis to conclude that pumping location materially affects whether groundwater levels will stabilize after 2040?
2. Is it technically reasonable to use Scenario 1B as an approximation of Judgment-allowed pumping distribution at the GMP Management Area scale for purposes of this analysis?
3. Do the existing BVHM results support the conclusion that increasing the pumping capacity beyond the current BPA rights within the Central and Southern Transfer Areas could cause or exacerbate projected chronic lowering of groundwater levels after 2040?
4. Do the existing BVHM results support the conclusion that the northern portion of the Basin has greater physical capacity to support pumping than the central and southern portions?
5. Is the proposed use of parcel-based Transfer Areas technically reasonable, given the location of BPA parcels, modeled pumping wells, and projected groundwater-level responses?

6. Are there technical flaws in the analysis that would impact Staff's conclusion that transfers be limited to within each of the three Transfer Areas?
7. Are there additional analyses that are necessary before the Board could rely on the proposed transfer restriction framework?

The TAC should focus its input on the technical analysis and physical conclusions described in this memo. The Board will determine whether and how to adopt the restrictions and how to address policy and equity considerations associated with such restrictions.

Next Steps

Following TAC discussion, Staff will summarize TAC input and present the proposed framework to the Board for discussion and direction. The TAC will be given two weeks to review this information and provide written comments to Watermaster Staff by June 19th at 12 pm. Comments received after this time will not be included in the summary to the Board for its June 24th Board meeting.

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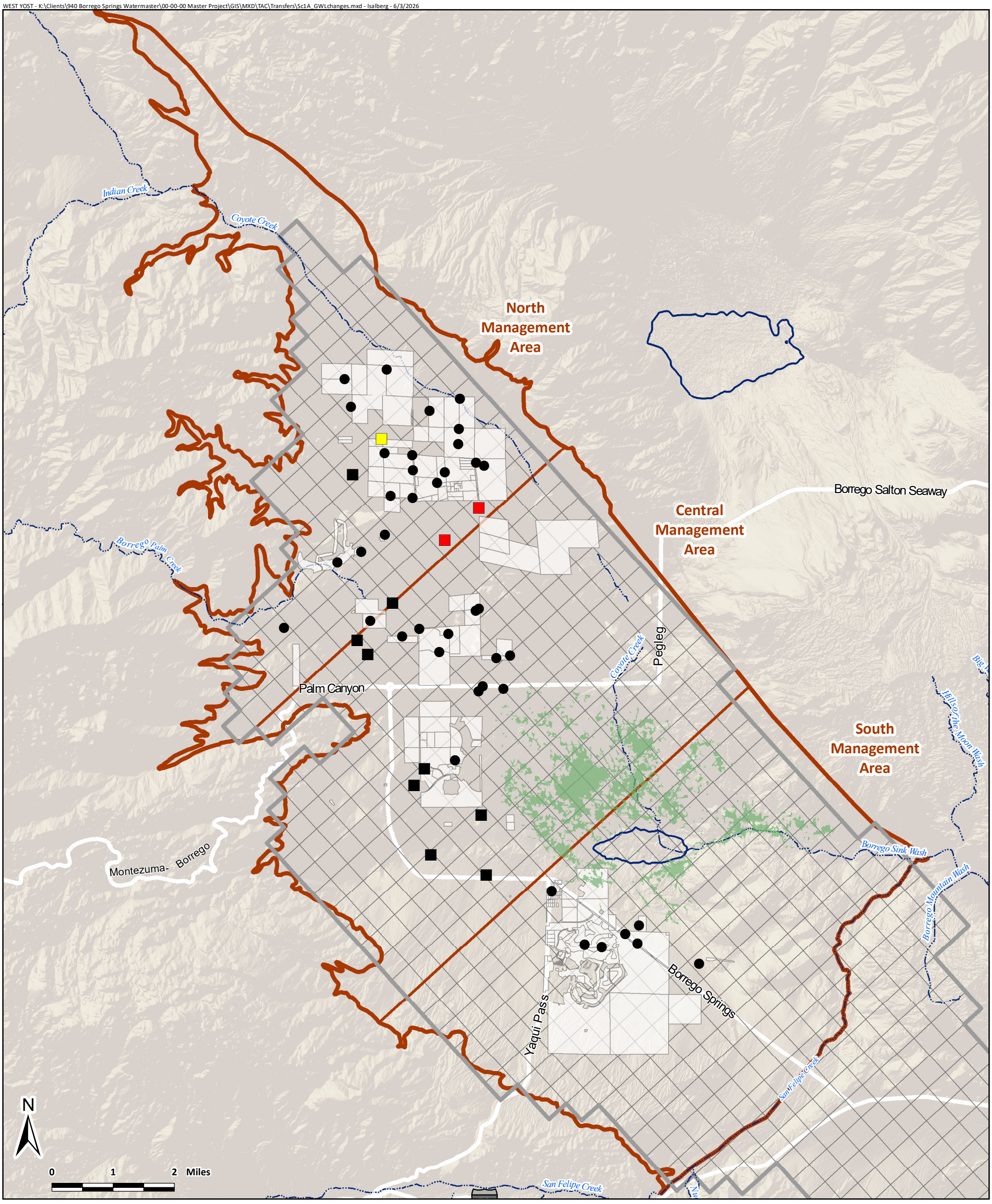

Production Wells used in BVHM Projection

- Pumping Well used in Scenarios 1A, 1B & 1C
- BWD Pumping Well used in Scenarios 1A, 1B & 1C
- Pumping Well used in Scenario 1B & 1C
- "Pseudo" Pumping Well used in Scenario 1C

Other Features

- Parcel with BPA Rights
- Mesquite Bosque (UCI, 2016)
- Dry Lake
- Borrego Springs Subbasin with Management Area Divisions
- Boundary of Active Cells in the BVHM

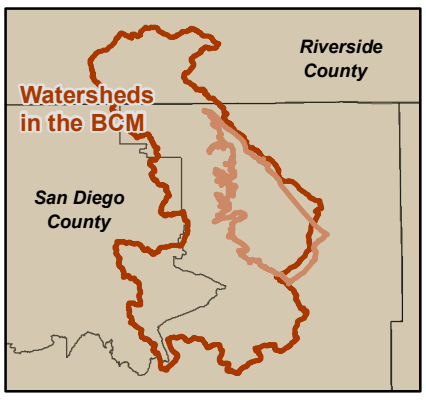

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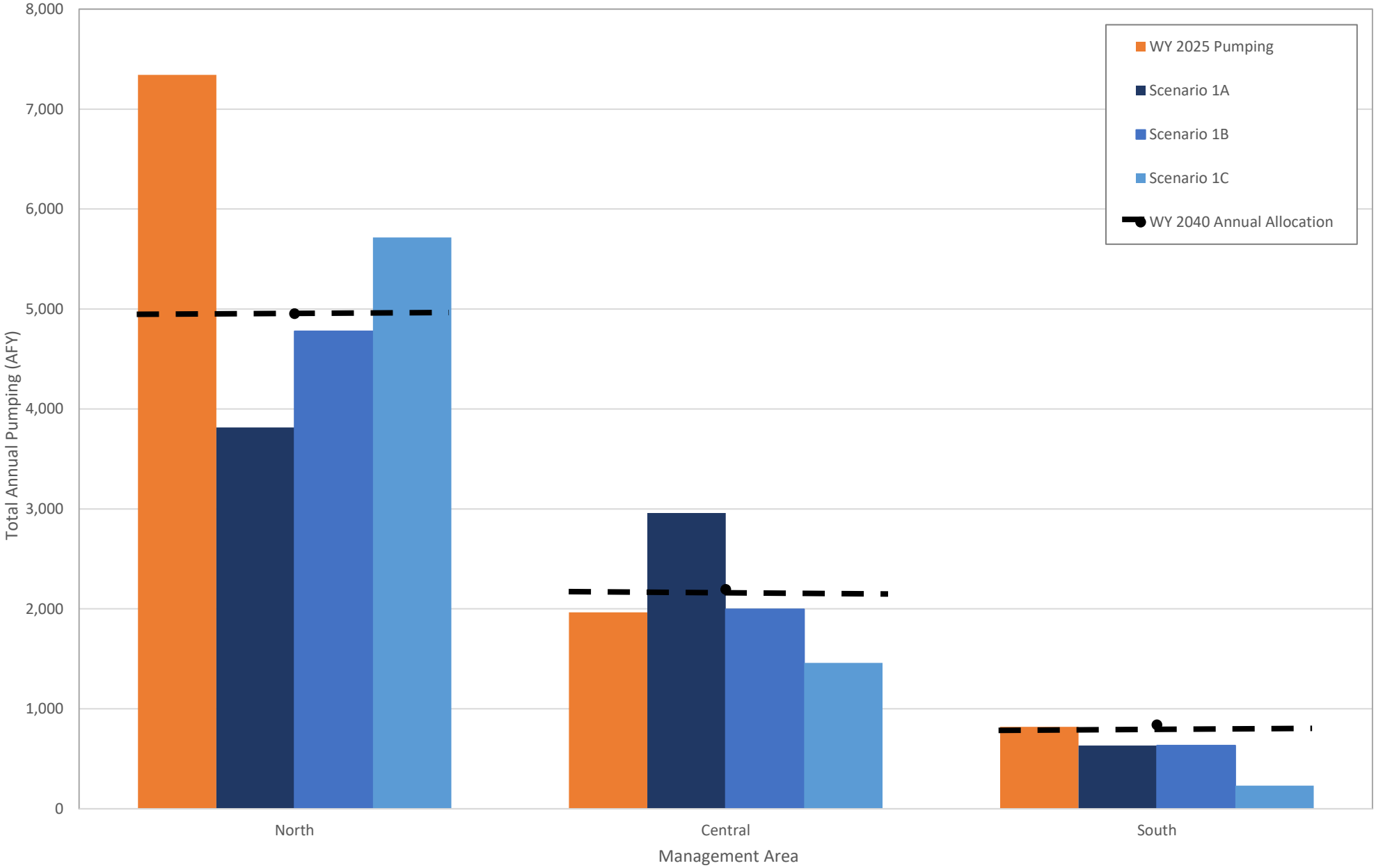
Figure 1

Pumping Wells used in BVHM Projection Scenarios relative to Parcels with BPA Rights

Table 1. Distribution of Water Rights, 2040 Annual Allocation, and BVHM Scenario Pumping in the NMA, CMA, SMA (afy)						
Management Area	**Water Rights *(BPA, ABDSP, BSUSD)***	**Percent of Total Rights**	**2040 Annual Allocation**	**Scenario 1A Average Pumping 2040-2070**	**Scenario 1B Average Pumping 2040-2070**	**Scenario 1C Average Pumping 2040-2070**
North	15,095	62.0%	4,955	3,815	4,778	5,716
Central[1]	6,653	27.3%	2,195	2,960	1,997	1,459
South	2,568	10.6%	840	632	632	232
Unassigned[2]	19	0.1%	7	0	0	0
Total	**24,335**	**100%**	**7,996**	**7,407**	**7,407**	**7,407**

1. All of BWD's rights are assumed in the CMA as they are not limited to any MA (except in the case of a new well, must first evaluate impacts) Current wells have capacity to pump BPA rights in the CMA. Rights acquired from Bauer properties remain assigned to NMA.
2. Unassigned pumping includes BPA assigned to five Parties that have not attached their rights to a specific parcel and don't have wells.

Figure 2. Average Pumping from 2040 to 2070 vs. Annual Allocation, by Management Area



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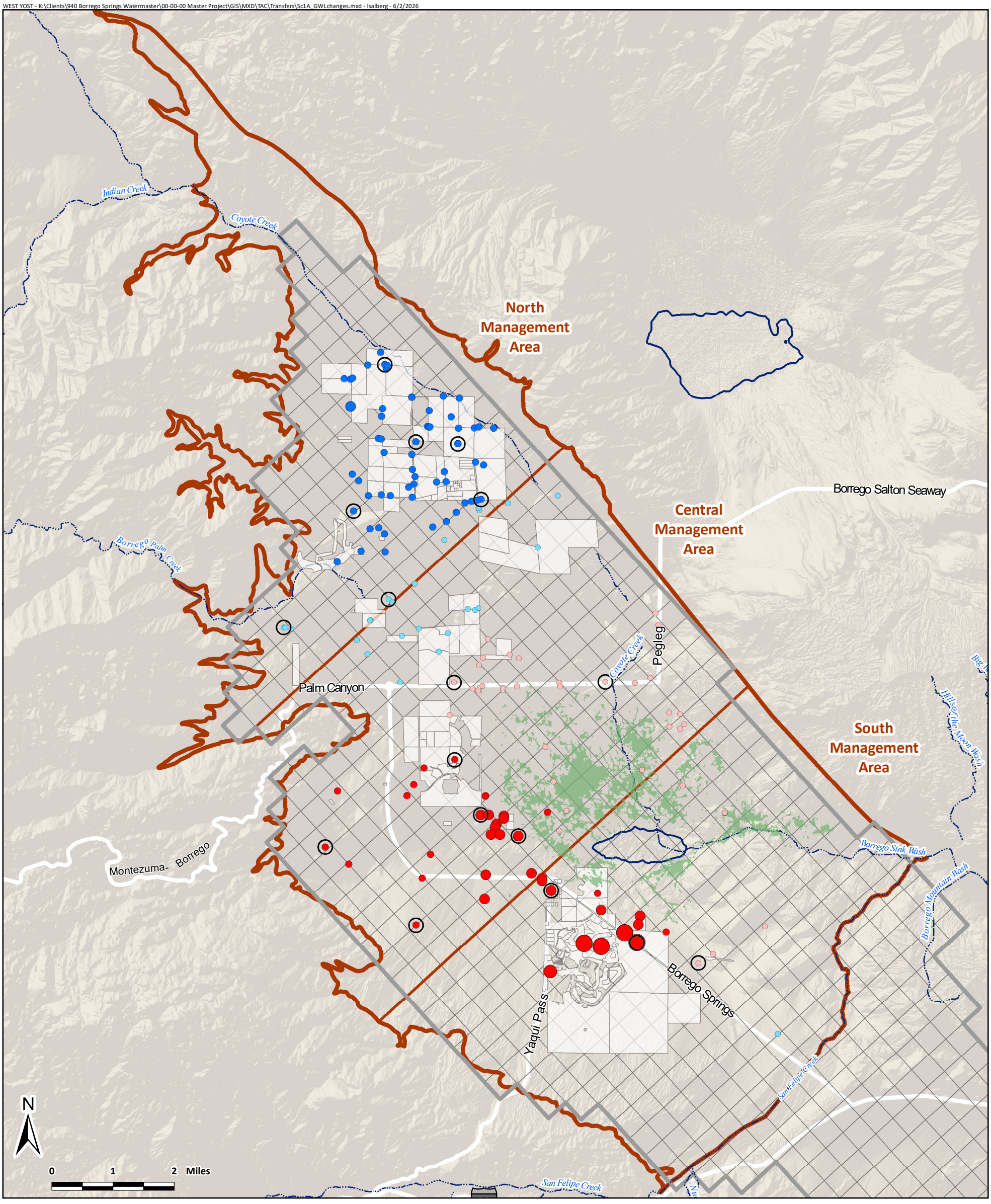

Change in Groundwater-Level from WY 2040 to 2070 (ft)

- > 35
- 20 - 35
- 10 - 20
- 5 - 10

Increasing Groundwater Levels

- 0 - 5
- -5 - 0

"Stable" Groundwater Levels

- -10 - -5
- -20 - -10
- -35 - -20
- < -35

Declining Groundwater Levels

Other Features

- Parcel with BPA Rights
- Representative Monitoring Well
- Mesquite Bosque (UCI, 2016)
- Dry Lake
- Borrego Springs Subbasin with Management Area Divisions
- Boundary of Active Cells in the BVHM

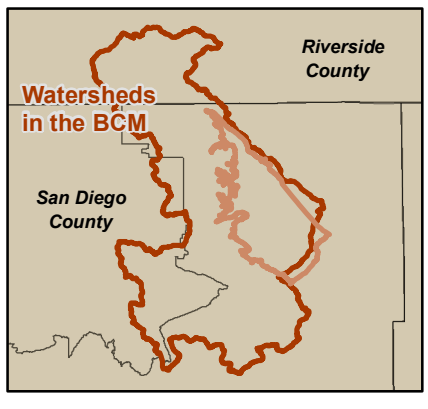

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Figure 3a

Cumulative Change in Groundwater-Levels
Scenario 1A
WY 2040 - 2070

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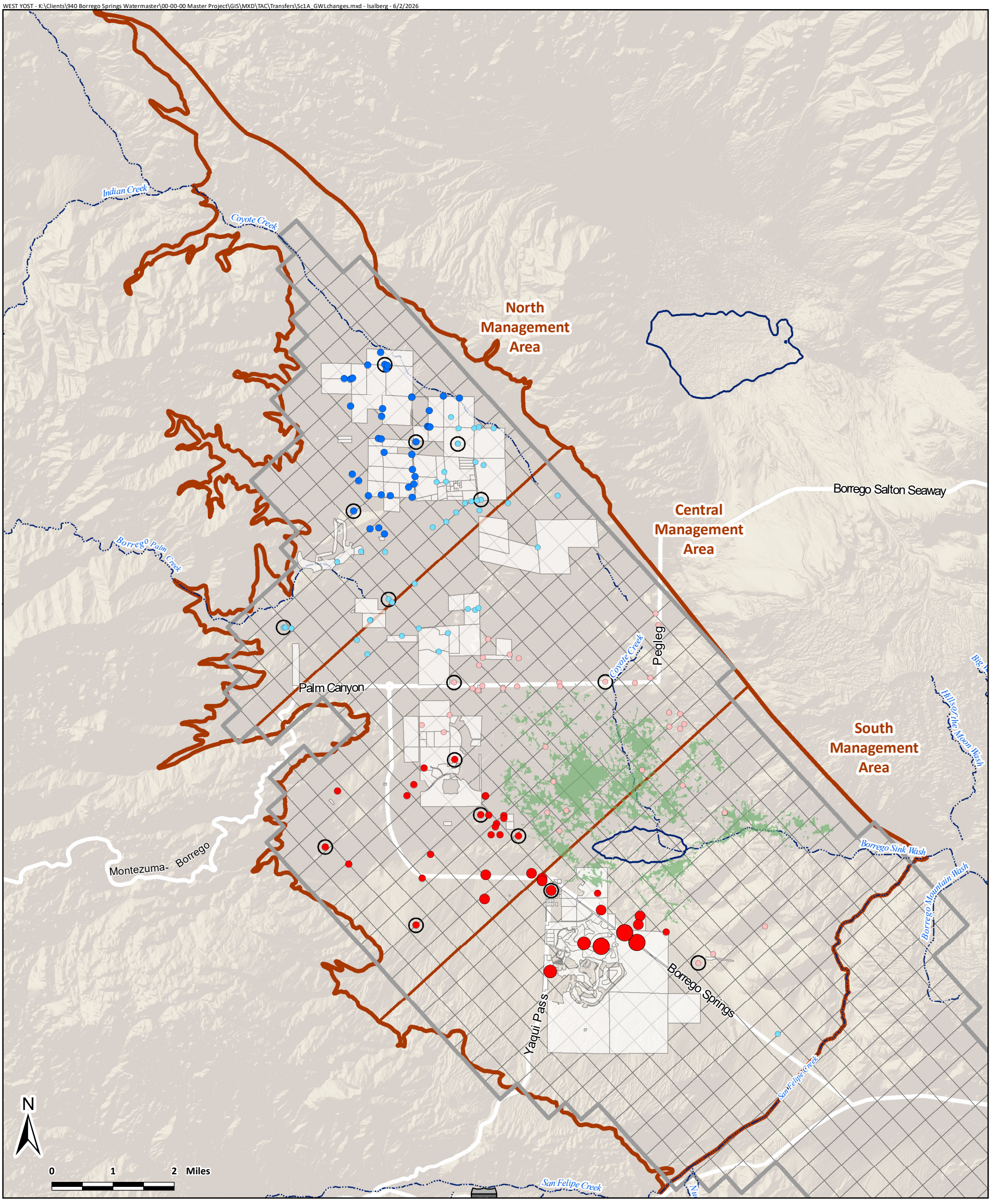

Change in Groundwater-Level from WY 2040 to 2070 (ft)

- > 35
- 20 - 35
- 10 - 20
- 5 - 10

Increasing Groundwater Levels

- 0 - 5
- -5 - 0

"Stable" Groundwater Levels

- -10 - -5
- -20 - -10
- -35 - -20
- < -35

Declining Groundwater Levels

Other Features

- Parcel with BPA Rights
- Representative Monitoring Well
- Mesquite Bosque (UCI, 2016)
- Dry Lake
- Borrego Springs Subbasin with Management Area Divisions
- Boundary of Active Cells in the BVHM

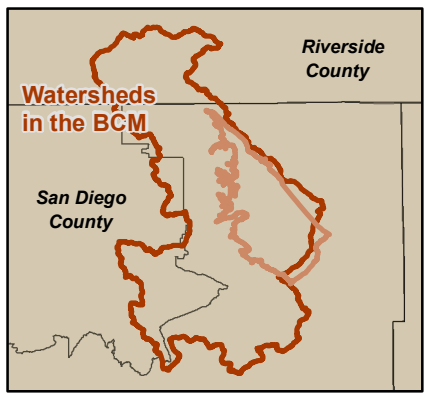

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Figure 3b

Cumulative Change in Groundwater-Levels
Scenario 1B
WY 2040 - 2070

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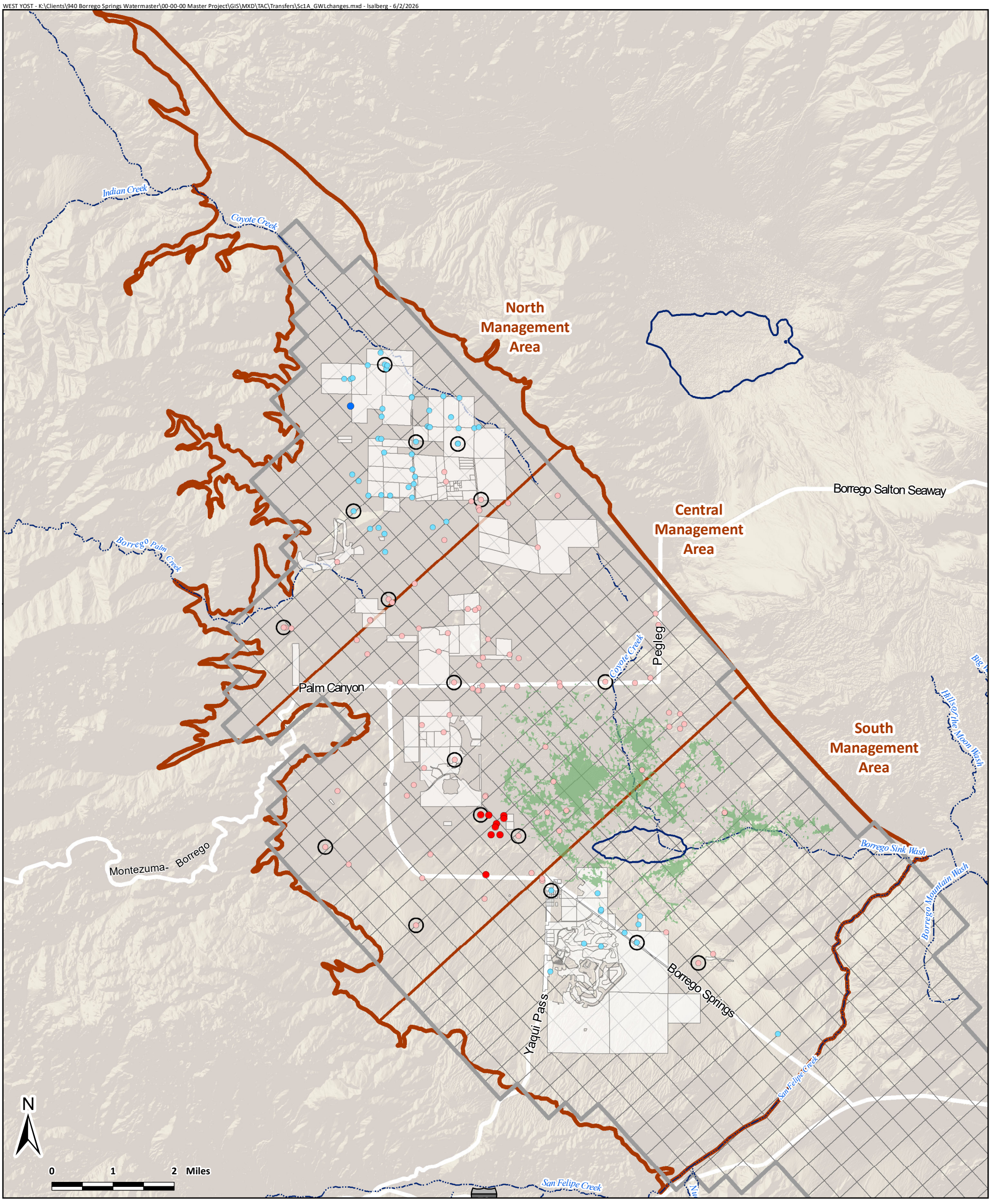

Change in Groundwater-Level from WY 2040 to 2070 (ft)

- > 35
- 20 - 35
- 10 - 20
- 5 - 10

Increasing Groundwater Levels

- 0 - 5
- -5 - 0

"Stable" Groundwater Levels

- -10 - -5
- -20 - -10
- -35 - -20
- < -35

Declining Groundwater Levels

Other Features

- Parcel with BPA Rights
- Representative Monitoring Well
- Mesquite Bosque (UCI, 2016)
- Dry Lake
- Borrego Springs Subbasin with Management Area Divisions
- Boundary of Active Cells in the BVHM

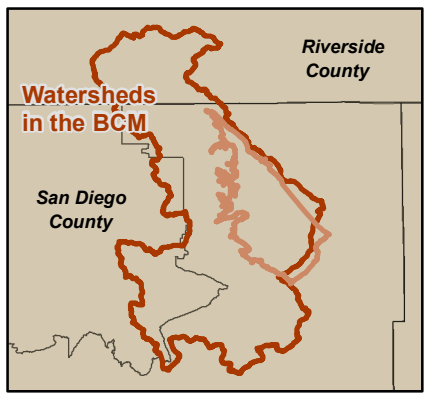

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Figure 3C

Cumulative Change in Groundwater-Levels
Scenario 1C
WY 2040 - 2070

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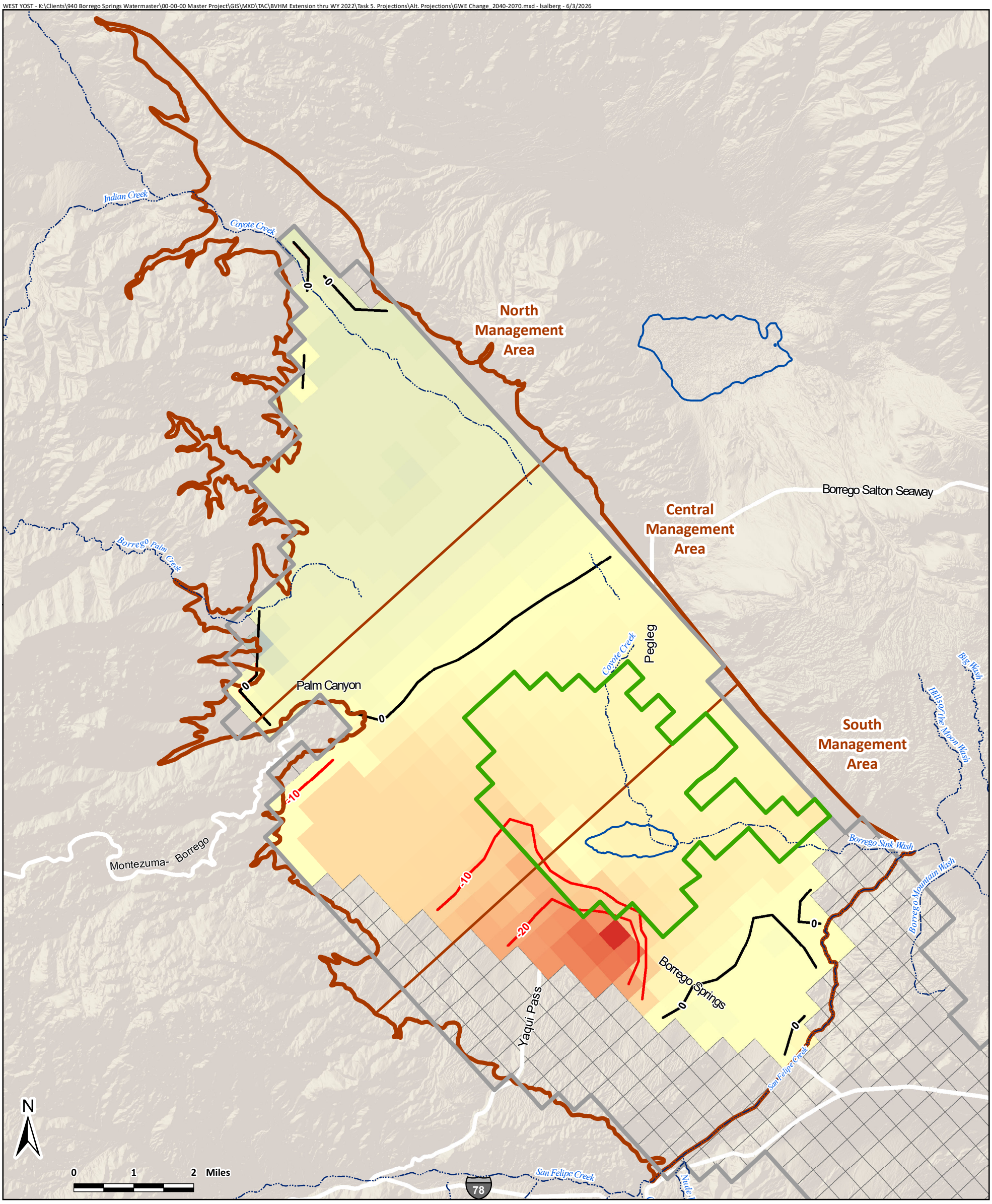


10 Contour of Groundwater Elevation Change (ft) - Positive
October 2040 to October 2070

10 Contour of Groundwater Elevation Change (ft) - Negative
October 2040 to October 2070

Change in Groundwater Elevation (ft)
October 2040 to October 2070

50 Increase
0
-50 Decrease

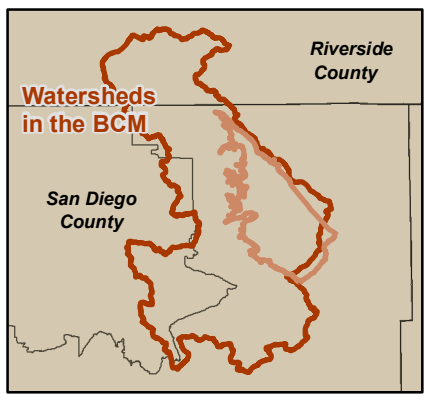
Other Features

Extent of Mesquite Bosque (UCI, 2016) within the BVHM Domain

Dry Lake

Boundary of Active Cells in the BVHM

Borrego Springs Subbasin with Management Area Divisions



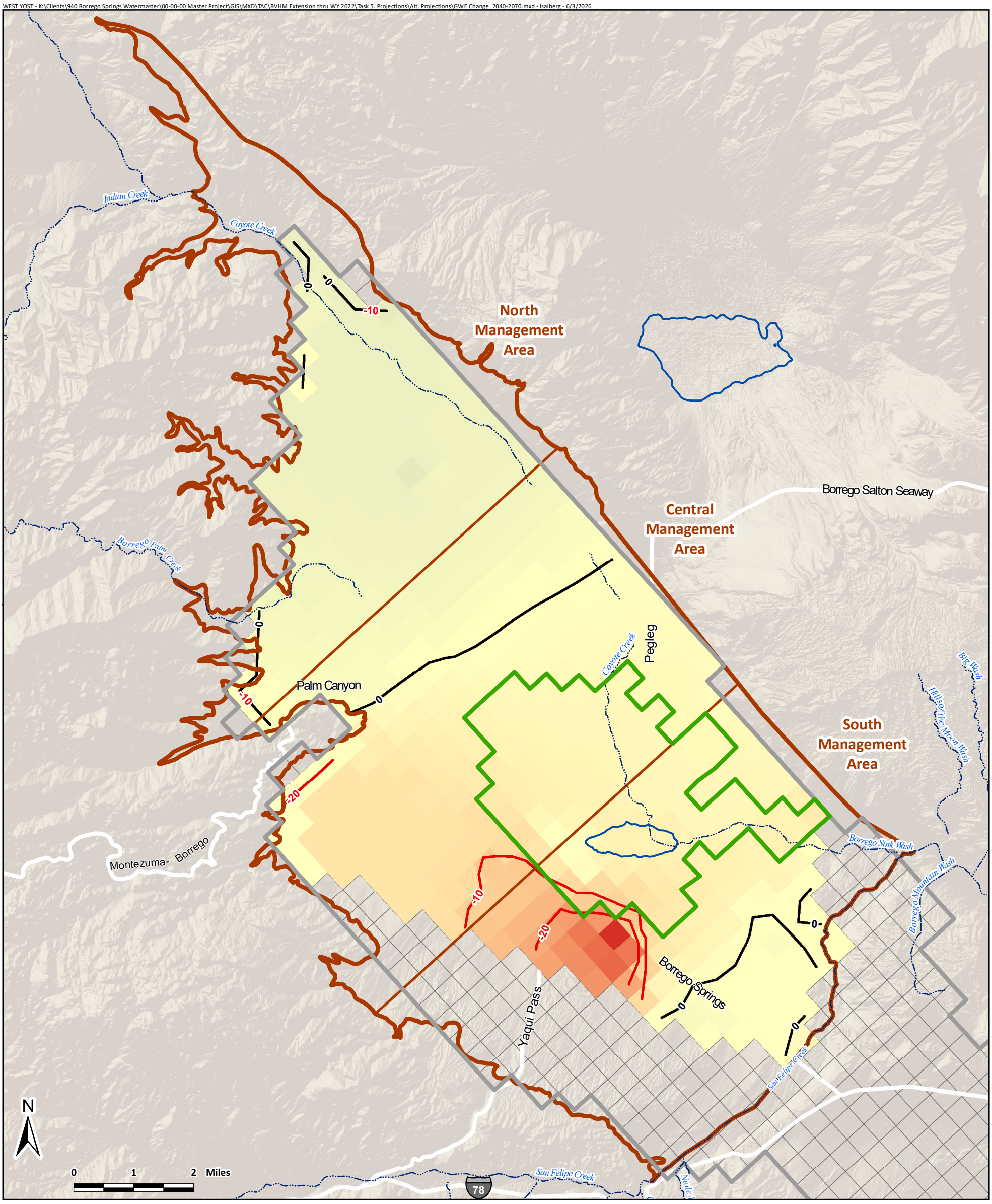
Prepared by:

WEST YOST

Figure 4a

Change in Groundwater Elevation - Layer 1
Scenario 1A
October 2040 minus October 2070

WEST YOST - K:\Clients\940 Borrego Springs Watermaster\00-00-00 Master Project\GIS\MXD\TAC\BVHM Extension thru WY 2022\Task 5. Projections\Alt. Projections\GWE Change_2040-2070.mxd - lsalberg - 6/3/2026



-10 Contour of Groundwater Elevation Change (ft) - Positive
October 2040 to October 2070

-10 Contour of Groundwater Elevation Change (ft) - Negative
October 2040 to October 2070

Change in Groundwater Elevation (ft)
October 2040 to October 2070

50 Increase
0
-50 Decrease

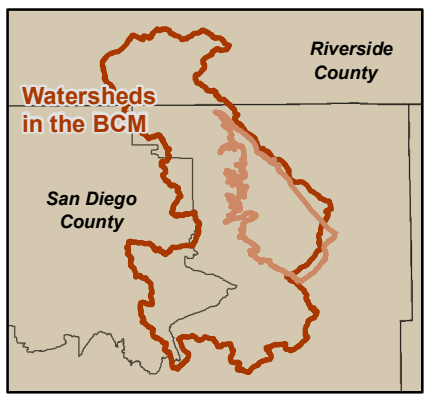
Other Features

Extent of Mesquite Bosque (UCI, 2016) within the BVHM Domain

Dry Lake

Boundary of Active Cells in the BVHM

Borrego Springs Subbasin with Management Area Divisions



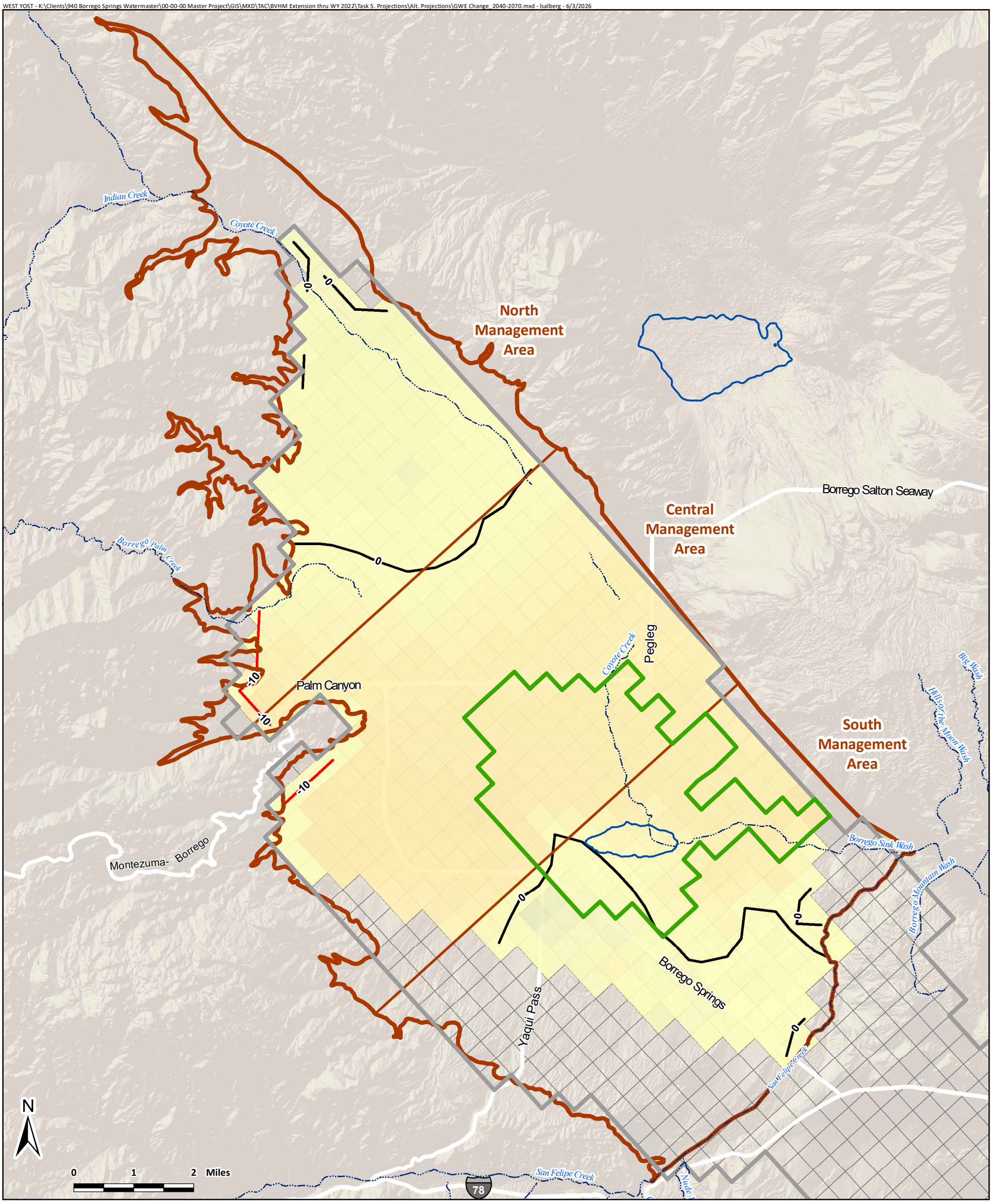
Prepared by:

WEST YOST

Figure 4b

Change in Groundwater Elevation - Layer 1
Scenario 1B
October 2040 minus October 2070

WEST YOST - K:\Clients\940 Borrego Springs Watermaster\00-00-00 Master Project\GIS\MXD\TAC\BVHM Extension thru WY 2022\Task 5. Projections\Alt. Projections\GWE Change_2040-2070.mxd - lsalberg - 6/3/2026



10 Contour of Groundwater Elevation Change (ft) - Positive
October 2040 to October 2070

10 Contour of Groundwater Elevation Change (ft) - Negative
October 2040 to October 2070

Change in Groundwater Elevation (ft)
October 2040 to October 2070

50 Increase
0
-50 Decrease

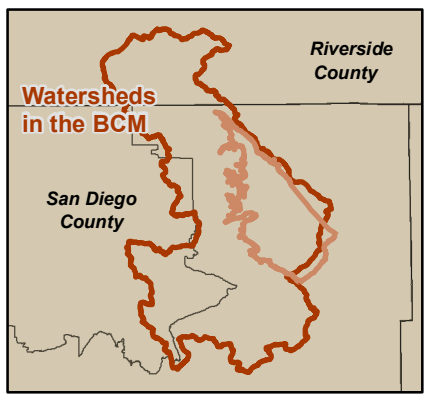
Other Features

Extent of Mesquite Bosque (UCI, 2016) within the BVHM Domain

Dry Lake

Boundary of Active Cells in the BVHM

Borrego Springs Subbasin with Management Area Divisions



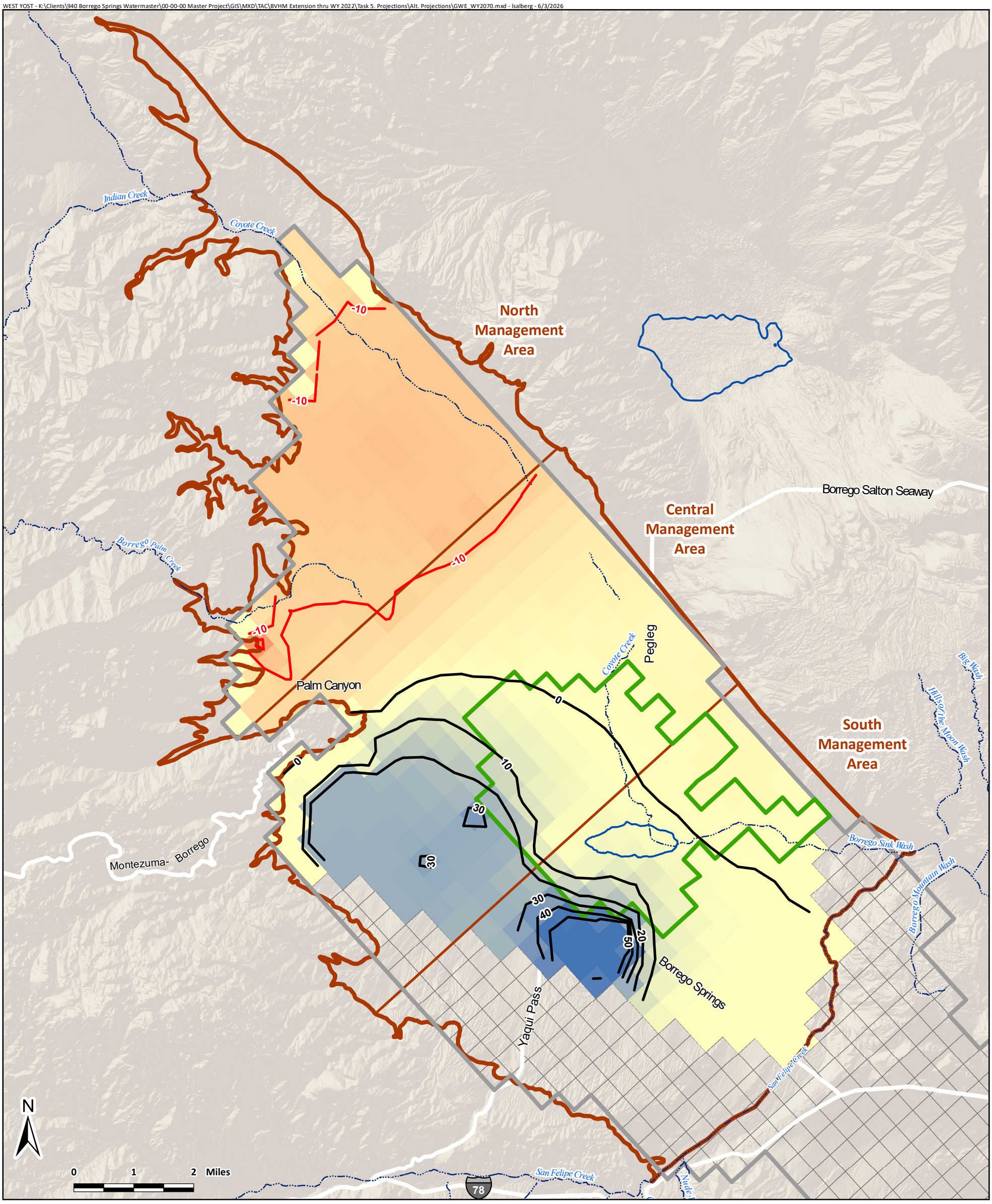
Prepared by:

WEST YOST

Figure 4c

Change in Groundwater Elevation - Layer 1
Scenario 1C
October 2040 minus October 2070

WEST YOST - K:\Clients\940 Borrego Springs Watermaster\00-00-00 Master Project\GIS\MXD\TAC\BVHM Extension thru WY 2022\Task 5. Projections\Alt. Projections\GWE_WY2070.mxd - lsalberg - 6/3/2026



-10 Difference in WY 2070 Groundwater Elevation (ft) - Positive
Scenario 1C is greater than Scenario 1A

-10 Difference in WY 2070 Groundwater Elevation (ft) - Negative
Scenario 1C is less than Scenario 1A

Difference in Groundwater Elevation (ft)
Scenario 1C minus Scenario 1A

50 Higher Groundwater Elevation in Scenario 1C

0

-50 Lower Groundwater Elevation in Scenario 1C

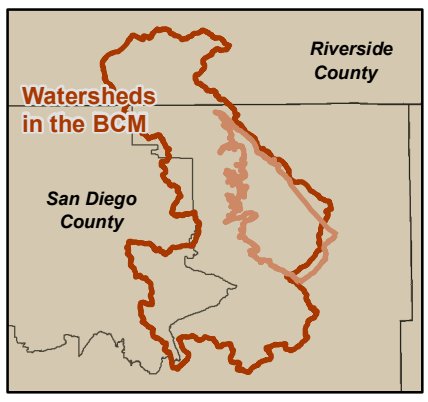
Other Features

Extent of Mesquite Bosque (UCI, 2016) within the BVHM Domain

Dry Lake

Boundary of Active Cells in the BVHM

Borrego Springs Subbasin with Management Area Divisions



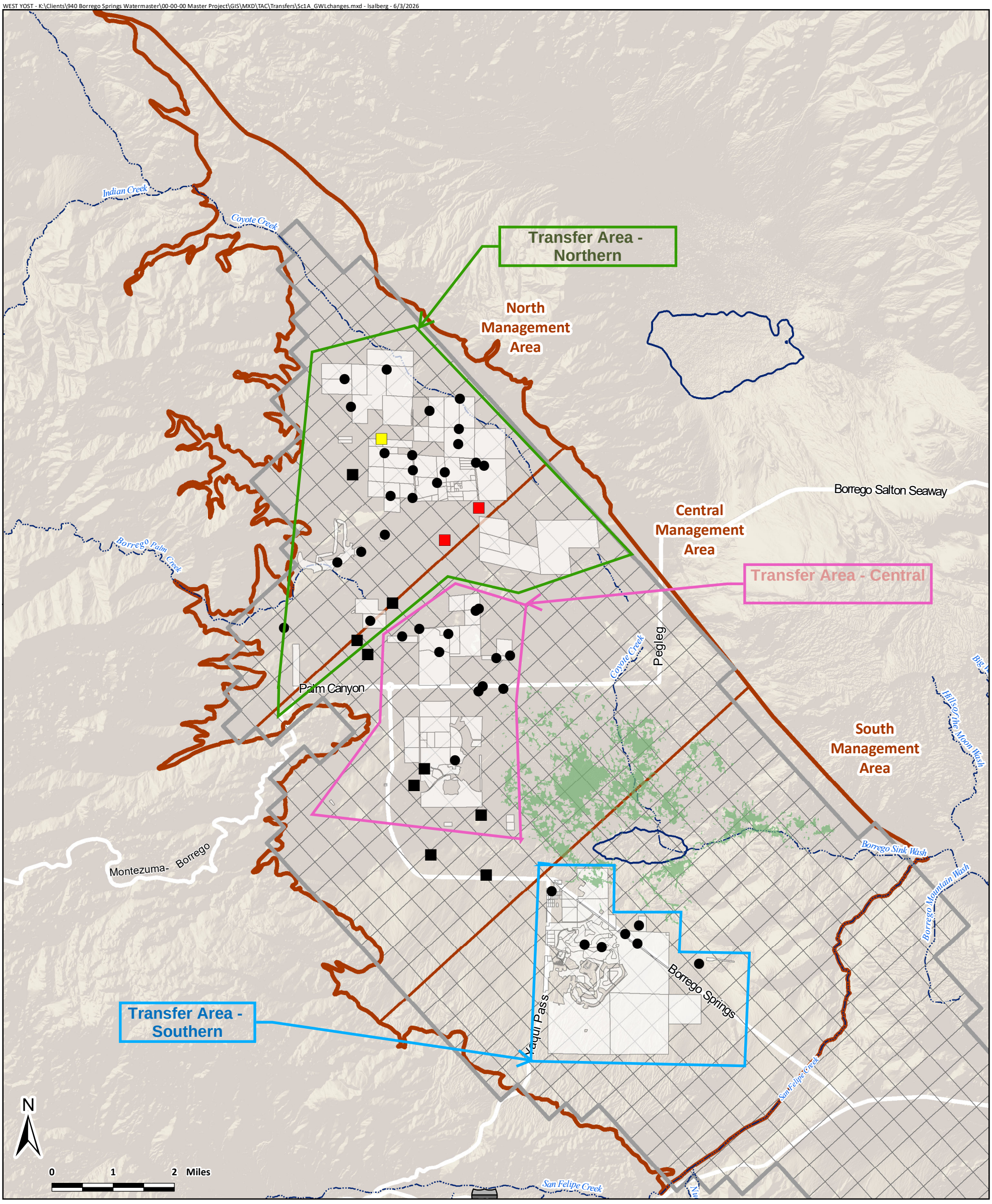
Prepared by:

WEST YOST

Figure 5

Difference in WY 2070 Groundwater Elevation
Scenario 1C minus Scenario 1A
(Layer 1)

WEST YOST - K:\Clients\940 Borrego Springs Watermaster\00-00-00 Master Project\GIS\MXD\TAC\Transfers\Sc1A_GWLchanges.mxd - lsalberg - 6/3/2026

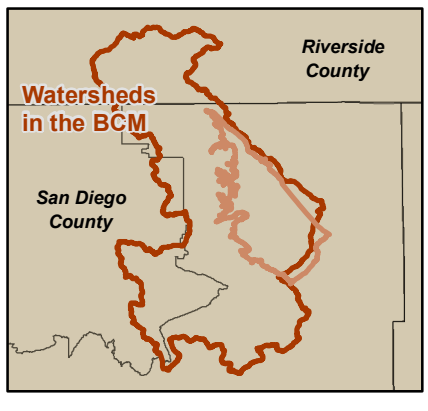


Production Wells used in BVHM Projection

- Pumping Well used in Scenarios 1A, 1B & 1C
- BWD Pumping Well used in Scenarios 1A, 1B & 1C
- Pumping Well used in Scenario 1B & 1C
- "Pseudo" Pumping Well used in Scenario 1C

Other Features

- Parcel with BPA Rights
- Mesquite Bosque (UCI, 2016)
- Dry Lake
- Borrego Springs Subbasin with Management Area Divisions
- Boundary of Active Cells in the BVHM



Prepared by:

WEST YOST

Figure 6

Proposed Transfer Areas

Samantha Adams

From: Leonardo Urrego-Vallowe <lurrego@wbecorp.com>
Sent: Friday, June 19, 2026 11:42 AM
To: Andy Malone; Lauren Salberg; Samantha Adams; Trey Driscoll; Jim Bennett; Russ Detwiler; Tom Watson; Bob Abrams; Robert Wagner
Subject: AAWARE Reponses to TAC Input on Technical Analysis of Water Rights Transfer Restrictions

Dear Andy and TAC members,

Please see below AAWARE's responses and feedback on the water transfer restrictions discussed during the June 10, 2026 TAC meeting.

Proposed parcel-based Transfer Areas
The current BPA parcels are not intended to be the only places where water can be pumped and used in Borrego. BPA allocations are transferrable in whole or in part to other parcels as other parcels are planted/developed.

BVHM projection results to conclude that pumping location materially affects whether groundwater levels will stabilize after 2040
The BVHM projections are helpful to provide an initial indication, however not sufficient for a conclusion at this point. Continued monitoring and data collection will be essential to better quantify how increases in pumping at specific locations may affect the ability of the groundwater basin to reach or maintain stable conditions after 2040.

Scenario 1B
Scenario 1B underestimates the pumping allowable under the Judgment by 200AFY (about 2.5%). The difference should be considered in evaluating BVHM projections of pumping distribution. Also, because Scenario 1B does not represent allowable pumping under the Judgment, consider naming it something other than the "Judgment Scenario".

Model results and lowering groundwater levels in the CMA and SMA
The BVHM model results support the conclusion that increasing pumping capacity beyond current BPA rights within the central and southern transfer areas could cause or exacerbate projected chronic decline in water levels.

Physical capacity of the NMA
The physical capacity of the NMA needs to be evaluated more carefully due to the loss in the return flows that will be caused by the transfer of water out of the NMA into the CMA or SMA. Sufficient water needs to remain in the NMA to supply the pumping rights allowable under the Judgment.

Additional analyses that are necessary before the Board could rely on the proposed transfer restriction framework
The model underestimates pumping allowable under the Judgment by 200 AFY, and does not account for transferability of BPA to parcels outside of the three Transfer Areas within each management area.

If water is physically transferred out of the NMA and/or the northern transfer area, the return flows from agricultural use which are an important water supply to the NMA need to be deducted from the transfer amounts to prevent adverse impacts to the remaining NMA allocation holders. Importantly, transfers must be subject to reduction or other adjustment if monitoring indicates the transfer may result in impairment to pumping by a BPA holder in the NMA. The parties to the transfer should be responsible for mitigating the impacts of their transfer on BPA holders in the NMA.

Additional considerations

When considering water transfers, enough BPA needs to remain in the NMA sufficient to allow for the natural subsurface gradient flow from the NMA to the CMA, and maintain that direction. In other words, excessive amount of transfers out of the NMA may prevent return of natural subsurface flow in the north to south direction, thus affecting sustainability goals.

Parties to the transfers should be financially responsible for the cost of Watermaster to analyze transfer requests and their impact(s) of the transfer on BPA holders in the NMA. The cost should not be part of Watermaster budget.

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WORKING DRAFT TECHNICAL MEMORANDUM

To:

Technical Advisory Committee Members	Bob Wagner, PE (Principal Water Resources Engineer, Wagner & Bonsignore) – *representing AAWARE*
	Tom Watson, PG (Principal Geologist, Aquilogic) – *representing T2 Borrego*
	Jim Bennett (County of San Diego and Watermaster Board Member) – *representing County of San Diego*
	John Peterson, PG, CHG (retired) – *representing Roadrunner Golf and Country Club*
	Dr. Russell Detwiler (University of California, Irvine) – *representing the Borrego Springs Community*
Watermaster Staff	Andy Malone, PG (Principal Geologist, West Yost)
	Samantha Adams (Executive Director, West Yost)
	Lauren Salberg, PG (Staff Geologist, West Yost)

From: Trey Driscoll, PG, CHG, Marisa Earll and Yara Pasner, PhD INTERA *(representing Borrego Water District)*

Date: June 19, 2026

Re: Technical Analysis for Water Rights Transfer Restrictions Comments

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The following comments provide review of the Technical Advisory Committee (TAC) meeting held on Wednesday, June 10, 2026. Additionally, we respond to the specific questions asked of the TAC.

1.0 General Comments

Comment 1. Please provide technical justification for how transfer areas were defined. What does it mean for wells outside the designated transfer areas? Why were specific parcels moved from CMA to NMA? The basis for delineating these new polygons is not clear from the materials provided and could have the unintended consequence of limiting the marketability of BPA sales, transfers, and leases, including blight of land, because the following standards are never implemented. Without a specific transfer analysis, it is unclear whether this proposed change is necessary. Furthermore, a proposed pumping transfer should be able to request and pay for necessary technical analysis (see Judgment 10. I. BPA Transfer. Transfer Costs) to definitively determine whether the transfer will result in *Undesirable Results* that would affect the sustainability of the Subbasin and harm the ability of pumpers to extract groundwater.

Comment 2: Please provide additional information about the technical basis for how carryover was included in this model analysis. It is our understanding that the simulation assumes full water rights allocations are in place; therefore, transfers, even between parcels within one management area, are not simulated in this analysis. Please clarify how carryover, both projected and accrued, was accounted for in this analysis.

Comment 3. The model does not provide a level of accuracy sufficient to be the primary justification for the need to implement these pumping transfer restrictions (see INTERA slides and TM presented at the June 10, 2026 TAC meeting). While the key basis for the need for these restrictions is based on avoiding more that 5 feet of projected groundwater level change in the CMA and SMA, the model, with absolute residuals on average approximately 10 feet in NMA and 20 feet in SMA, cannot resolve with certainty these small water level changes (see Response 1 below). In addition, BVHM may not fully account for uncertainty in the projected climate changes. We recommend that the existing framework of evaluating transfers and carryover on a case-by-case is sufficient and reflects an adaptive management approach. Case-by-case evaluation can include analytical analysis of impacts on nearby wells and analysis of change in storage relative to MTs using the BVHM, all at the cost of the transferees.

Comment 4. Watermaster staff reviewed the distribution of pumping in BVHM Scenarios 1A-1C relative to Judgment Scenario and resulting future changes in groundwater levels to conclude:

- "GWLs are projected to decline in the [central management area] CMA/ [south management areas] SMA after 2040 in Scenarios 1A/1B, but increase in the [north management area] NMA
- GWLs are most stable across the Basin after 2040 in Scenario 1C
- Pumping under the Judgment rights is similar to Scenario 1B, which does not result in a sustainable outcome in CMA/SMA
- Therefore, no demonstrated capacity to increase BPA in CMA/SMA through transfers
- NMA appears to have capacity to support additional pumping, but it may need to be reserved for pumpers who cannot sustainably access their water rights in CMA/SMA"

The Watermaster staff analysis appears to rely primarily on BVHM results by well and may not fully account for uncertainty in the model results, projected changes in net subsurface flow among the management areas or observed data in developing these conclusions (see INTERA slides and TM presented at the June 10, 2026 TAC meeting). Under all three pumping scenarios, 1A-1C, the long-term net subsurface exchange from the NMA to the CMA increases in the BVHM (see **Figures 1-3**). Additionally, increased pumping in the NMA under Scenario 1C may result in lower groundwater levels in the CMA and near the area identified with potential Groundwater Dependent Ecosystems that may affect achieving and maintaining sustainability in the Subbasin (see **Figure 4**).

The Judgment and GMP do not appear to expressly establish a concept of reserving pumping capacity in any past of the Subbasin. Rather, the Judgment emphasizes Reasonable and Beneficial Use under Article X, Section 2 of the California Constitution which requires the water of the state to be put to reasonable and beneficial use. Unless and until a pumper demonstrates that they cannot reasonably access their water right, it is not clear that reserving pumping capacity is technically or legally supported.

Comment 5. Watermaster staff states that "The difference in planned pumping volumes in Scenario 1A compared to the present in the Central Management Area is notable. It highlights that current groundwater-level stability in the Central Management Area cannot be relied upon as evidence, on its own, to conclude that future groundwater levels will remain stable".

Scenario 1A pumping from 2040 to 2070 is 2,960 AFY in the CMA compared to WY 2025 pumping of 1,927 AFY when observed data indicates stable groundwater levels (see **Figure 5**). This is noted as a difference of 1,033 AFY. Whereas WY 2040 and Beyond Annual Allocation in the CMA is 2,202 or 28 percent of allowable pumping, assuming all unassigned pumping occurs in the CMA (**Tables 1 and 2**). WY 2025 pumping in the NMA was 7,342 AFY or 2,387 AFY greater than WY 2040 and beyond allocation of 4,955 AFY. As demonstrated by the BVHM zone budget analysis, subsurface net flow from the NMA to CMA is predicted to increase by as much as 5,000 AFY from present to 2070 under Scenario 1A. This provides additional supporting evidence (using BVHM as required by the Judgment) that the actual achievable pumping in the CMA is likely greater than the WY 2025 pumping of 1,927 AFY and WY 2040 and Beyond allocation of 2,202 AFY. Pumping in the CMA and over the entire Subbasin should be adaptively managed over time to maintain stable groundwater levels and avoid *Undesirable Results*. Observed data must be continually evaluated in accordance with the Judgment and greater weight placed on measured outcomes rather than future predictions. The transfer policy must explicitly state how adaptive management will be implemented in terms of evaluation of future proposed transfers of BPA including any temporary lease of BPA or carryover. Overly rigid transfer criteria may result in unattended consequences for pumpers.

Comment 6. Watermaster staff indicate the "Additional BVHM Simulations (Judgment Scenario): Given cost and planned efforts to update/improve model over the next three years, Board requested Staff first compare the pumping volumes and locations in the existing BVHM projection scenarios to the distribution of Judgment-allowed pumping to determine whether the existing model scenarios provide enough information to support an initial transfer evaluation framework".

The Judgment is clear that, "All costs of transfers (including costs of any fallowing remediation) will be borne by the Parties to the transfer transaction, not by Pumping Assessments" (Judgment 10. I. BPA Transfer. Transfer Costs). The transfer framework should recognize this requirement and provide pumpers with the opportunity to present additional information and data that may be pertinent to the analysis. The initial transfer evaluation framework could provide transfers within the proposed management areas, while also allowing pumpers to request evaluation of transfers among management areas through an appropriate review process and at their cost. Watermaster staff also indicate that additional BVHM simulations may occur in approximately three years, presumably in connection with the next update of the Sustainable Yield; however, the materials do not clearly state whether, or how often, the permanent transfer framework would be reevaluated.

Comment 7. This proposed transfer policy may effectively require the initiation of Project Management Action 6 (PMA-6): Intra-Subbasin Water Transfers in the Borrego Springs Subbasin which is one of the six PMAs identified in the Groundwater Management Plan. PMA-6 was proposed to establish a mechanism for transferring pumping allocations between groundwater users inside the Subbasin to improve flexibility, support economic activity, and help meet SGMA sustainability requirements. As part of consideration of adopting a policy restricting transfers, the Watermaster should provide additional information regarding how it will evaluate and support PMA-6.

2.0 Response to Requested Questions

Questions 1. Do the existing BVHM projection results provide a sufficient technical basis to conclude that pumping location materially affects whether groundwater levels will stabilize after 2040?

Response 1. In a system of limited water availability (i.e. desert climate), physical pumping (extraction of groundwater) will be a primary driver affecting groundwater levels. The BVHM makes several assumptions including that future climate will repeat based on past periods of precipitation and temperature, and establishes the future physical location and magnitude of pumping based on plans communicated by the pumpers. Future climatic conditions (wet or dry, hot or cool) could materially affect groundwater levels as much as current and future pumping. Climatic effects to groundwater levels are observed in the Clark Dry Lake area of the Ocotillo-Clark Valley Groundwater Basin where groundwater levels have declined over the past decades despite the absence of pumping. The Judgment identifies the absence of *Undesirable Results* (i.e., Minimum Thresholds) as the criterion for evaluating transfers, rather than whether groundwater levels stabilize after 2040. This distinction may warrant clarification to ensure the technical evaluation criteria are applied consistently in matters before the Watermaster.

The Watermaster figures included in the June 10, 2026 TAC agenda indicate "Stable" Groundwater Levels as plus/minus five feet (see **Figure 7**). The basis for this plus/minus 5 feet criteria are unknown. Additionally, under pumping Scenario 1C, declining groundwater levels in the southern portion of the CMA may be a consequence of unrealistic model properties (see anisotropy and specific storage discussion below). For comparison, the absolute model residuals in the NMA and CMA are approximately 10 feet and approximately 20 feet in the SMA (see **Figure 8**). Stable groundwater levels are the sustainability goal for the Subbasin. Many other basins in California provide for significantly more operational flexibility than provided here.

BWD does not interpret the Judgment to require stabilization of every groundwater level in the Subbasin in order to demonstrate the absence of *Undesirable Results*. As presented at the March 17-18th workshop in Borrego Springs, operational flexibility should be provided as documented in the California Department of Water Resources (DWR) Best Management Practices (BMPs) that allow for groundwater levels to fluctuate between the MOs and MTs (see **Figure 9**). Because the current MTs (*Undesirable Results*) are not fully aligned across the Subbasin, additional future clarification may be helpful to support consistent implementation of Subbasin management (**Figure 10**).

There are three remaining five-year planning periods before 2040—2030, 2035, and 2040—during which additional data will become available to support further evaluation of groundwater-level stabilization beyond 2040. This includes documentation of pumping location and volume and corresponding response of groundwater levels. It may be premature to use BVHM projection results to establish a definitive technical basis to conclude how pumping will materially affect groundwater levels at a particular location after 2040 given identified model issues as presented at the June 10, 2026 TAC meeting. In particular, the model simulates vertical anisotropy—the ratio of horizontal to vertical hydraulic conductivity (K_h/K_v)—to be less than one in many regions of the model domain, particularly in the CMA and NMA. A ratio less than one implies vertical hydraulic conductivity exceeds horizontal hydraulic conductivity, which is atypical for the layered alluvial deposits in the basin and tends to favor

lateral flow over vertical flow. As a result, the model is likely to underestimate the lateral extent of drawdown caused by pumping.

Similarly, specific storage is less than 1×10^{-6} ft^{-1} across much of the CMA and SMA. Because lower specific storage releases less water per unit decline in head, these values could cause the model to simulate more drawdown from a given amount of pumping than would occur with larger—and likely more realistic—specific storage values. Taken together, these parameters bias the simulation in opposing and partly offsetting ways: the low vertical anisotropy (K_v greater than K_h) understates the lateral extent of drawdown, while the very low specific storage overstates drawdown magnitude at a given location. The low anisotropy also offers a plausible mechanism for an otherwise puzzling result—simulated confined-zone water levels vary less than the observed record, the opposite of what very low specific storage alone would produce (for example, see the hydrographs of simulated vs. observed water levels as reported in the 5-year GMP update at RH ID1-2, ID1-12). Strong vertical hydraulic communication can supply water by leakage from adjacent layers and from unconfined storage, buffering the confined response and effectively masking the low specific storage. If the historical calibration was achieved in part through this kind of compensation between anisotropy and storage, projected water-level changes at any specific location may be subject to substantial and difficult-to-quantify uncertainty.

Question 2. Is it technically reasonable to use Scenario 1B as an approximation of Judgment-allowed the pumping location and volume and the Management Area scale for purposes of this analysis?

Response 2. No. The Sustainable Yield of the Subbasin is currently 7,952 AFY. All the scenarios (including Scenario 1B) only pump 7,407 AFY from 2040 to 2070 (545 AF less per year; 16,350 AF over the 30 years). Scenario 1B also does not include all carryover (unused Annual Allocation) that can be used in future years as provided in the Judgment. As of October 1, 2025, the Watermaster indicates a carryover balance of 25,050 AF[1]. As Scenario 1B pumping is below the Annual Allocation from 2040 to 2070 and excludes exercising some carryover, significant volumes of Judgment-allowed pumping have not been considered. Neglecting the inclusion of all water rights allowed under the Judgment may affect Pumpers' beneficial use of water. As previously described, the transfer framework should provide pumpers the opportunity to present additional information and data that may be pertinent to the transfer analysis on a case-by-case basis in agreement with the Judgment.

Question 3. Do the existing BVHM results support the conclusion that increasing the pumping capacity beyond the current BPA rights within the Central and Southern Transfer Areas could cause or exacerbate projected chronic lowering of groundwater levels after 2040?

Response 3. The Judgment states that, "In order to protect the Basin and protect against *Undesirable Results*, the Watermaster, with input from the Technical Advisory Committee, 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[2]." *Undesirable Results* are the required technical

[1] Table 17. WY 2025 Water Rights Accounting Summary for the Borrego Springs Subbasin (West Yost 2026).
[2] Judgment III. Declaration of Rights and Obligations, I BPA Transfer 5 Restrictions on Transfers.

criteria for the Watermaster to evaluate transfer restrictions. It does not require technical evaluation of the sustainability goal, measurable objectives or interim milestones.

Undesirable Results are defined in the Judgement as defined by Water Code section 10721(x)[3].

Water Code section 10721(x):

(x) "Undesirable result" means one or more of the following effects caused by groundwater conditions occurring throughout the basin:

(1) Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply if continued over the planning and implementation horizon. Overdraft during a period of drought is not sufficient to establish a chronic lowering of groundwater levels if extractions and groundwater recharge are managed as necessary to ensure that reductions in groundwater levels or storage during a period of drought are offset by increases in groundwater levels or storage during other periods.

(2) Significant and unreasonable reduction of groundwater storage.

(3) Significant and unreasonable seawater intrusion.

(4) Significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies.

(5) Significant and unreasonable land subsidence that substantially interferes with surface land uses.

(6) Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water.

Sustainable Management Criteria (SMCs) are described in the GMP for each of the sustainability indicators. The Groundwater Levels – Sustainability Management Criteria Borrego Springs Subbasin are summarized as follows:

Sustainability Goal:

• Groundwater elevations are sufficient to protect municipal, irrigation, and domestic uses/users in the Basin, recognizing that domestic users commonly have the greatest sensitivity to declining groundwater levels.

• Trends in groundwater levels are stable or increasing by 2040 and thereafter.

Interim Milestones Measurable Objectives (MOs):

• Set based on BVHM-predicted groundwater level elevations under Scenario 1A

Minimum Thresholds (MTs)

[3] Judgement I. Definitions and Exhibits.

• Established primarily to protect pumping wells by avoiding impairment of well function and maintaining beneficial use. Because MTs are specific to each user type and each RMS well construction (i.e. top screen), they may not be appropriate to use for evaluation of transfers in portions of the Subbasin.

Based on review of the SMCs for groundwater levels, the Watermaster has selected the sustainability goal rather than *Undesirable Results* (i.e. Minimum Thresholds) as the criteria to evaluate transfer restrictions. This approach is more conservative and may affect beneficial use of water in the Subbasin. It is also noted that the Watermaster has used Scenario 1A to set MOs, which has average pumping in the CMA from 2040 to 2070 of 2,960 AFY compared to pumping in Scenario 1B 1,997 AFY (963 AFY less). Hence by default, use of Scenario 1B for the water transfer restriction evaluation uses pumping below what was used to establish MOs for the CMA. This approach is not technically aligned with an analysis of *Undesirable Results*.

Undesirable Results are quantitatively expressed as a minimum threshold which is the point where an Undesirable Result could occur if groundwater levels decline below this value. Use of projected lowering of groundwater levels below 5 feet is a new definition and suggests that any lowering of groundwater levels is an *Undesirable Result* which is not aligned with operational flexibility between the MO and MT described in DWR's BMPs.

Additionally, the BVHM review of net subsurface flux suggests that increased pumping in the NMA may actually cause or exacerbate projected lowering of groundwater levels in the CMA including in the vicinity of the area mapped with potential Groundwater Dependent Ecosystems (see **Figure 4**). As such, all applicable sustainability indicators are needed to be technically evaluated.

We concur with the conclusion that transfers to the SMA may cause or exacerbate Undesirable Results and that any proposed transfers to this area be closely inspected.

Question 4. Do the existing BVHM results support the conclusion that the northern portion of the Basin has greater physical capacity to support pumping than the central and southern portions?

Response 4. At the sustainable yield of 7,952 AFY, the BVHM does not support the conclusion that northern portion has a greater capacity to support pumping. This just happens to be where pumping occurred at the negotiation of the Judgment. Given the volume of groundwater in storage (millions of acre-feet) and the natural gradient of subsurface flow from the north to south, it may be possible to pump half of the sustainable yield from the CMA in the future without experiencing *Undesirable Results*. This would lead one to conclude that under current and future operating conditions, the northern portion of the Basin (i.e., NMA) does not have greater physical capacity to support pumping than the central portion (i.e., CMA). The BVHM results and historical observed data do definably support the conclusion that the southern portion (i.e., SMA) does not have the same physical capacity (as measured by transmissivity and specific capacity) of the NMA or CMA as previously documented by multiple studies (USGS 2015, Burzell 1972).

Question 5. Is the proposed use of parcel-based Transfer Areas technically reasonable, given the location of BPA parcels, modeled pumping wells, and projected groundwater-level responses?

Response 5. The proposed use of parcel-based Transfer Areas may be more restrictive than necessary and does not clearly describe how adaptive management under the Judgment would be incorporated. This approach also does not appear to fully address other sustainability indicators listed under the definition of *Undesirable Results*, such as degraded water quality or the water-quality requirements associated with particular beneficial uses, including potable water supplies subject to Title 22 drinking water standards. Additionally, the proposed use of parcel-based Transfer Areas does not clearly define how transfers within each of the three areas would be evaluated with respect to potential *Undesirable Results* for existing pumpers.

Question 6. Are there technical flaws in the analysis that would impact Staff's conclusion that transfers be limited to within each of the three Transfer Areas?

Response 6. The analysis does not appear to rely on *Undesirable Results* (MTs), as defined by the Judgment and SGMA, as the primary evaluation criterion, and it does not appear to consider all applicable sustainability indicators in the Subbasin. The analysis relies primarily on modeled results, while observed data and Zone Budget analysis suggest that future sustainable pumping in the CMA may exceed the WY 2040 Annual Allocation. The BVHM is a regional groundwater model developed to evaluate basin-scale groundwater conditions and water budgets and was not specifically designed to evaluate the localized effects of individual BPA transfers or establish parcel-scale transfer restrictions.

Use of the BVHM projections alone does not provide a sufficient technical basis for establishing transfer restrictions and should be supplemented with transfer-specific technical evaluations, analytical methods, and consideration of observed groundwater levels. Additionally, limitations associated with model parameterization (see Response 1), particularly assumptions regarding vertical anisotropy and specific storage in portions of the CMA and SMA, may influence the simulated magnitude and spatial extent of drawdown and introduce uncertainty in projected groundwater-level responses for individual transfers. The proposed transfer analysis also appears to limit the adaptive management approach outlined in the Judgment, under which Sustainable Yield, carryover, and SMCs are evaluated on a five-year basis, by relying on a 2040–2070 model projection to support restrictions on permanent transfers and carryover. Additional clarification may be warranted regarding how this approach would be reconciled with potential future groundwater use and the Article X Reasonable and Beneficial Use Doctrine cited in the Judgment.

Questions 7. Are there additional analyses that are necessary before the Board could rely on the proposed transfer restriction framework?

Response 7. Watermaster appears to have predetermined the outcome that transfers need to be restricted based on proposed future Pumper pumping plans that may prove unreliable, predictive modeling results and a new interpretation of *Undesirable Results* where they equate to the sustainability goals (i.e. MO rather than the MT), including a new definition of plus or minus 5 feet that was not vetted by stakeholders or the TAC as part of the just completed Periodic Evaluation. In alignment with the Judgment, the transfer framework must provide pumpers with the opportunity to present additional technical analyses and data that may be pertinent to review of the transfers on as case-by-case basis.

3.0 Additional Questions on TAC Materials

The following additional questions on materials dated June 5, 2026, Request for TAC Input on Technical Analysis of Water Rights Transfer Restrictions are as follows:

- Figure 4b. Change in Groundwater Elevation - Layer 1 Scenario 1B October 2040 minus October 2070 uses layer 1 to evaluate changes in groundwater levels. Would you please confirm that Layer 1 in the SMA remains saturated and whether use of Layer 2 displays the same results.
- Figure 5. A 10-foot decline of groundwater levels across the entire NMA with higher storage values likely represents a greater decrease in storage than a recovery of 30 to 50 feet in the SMA with confined storage values. Is Scenario 1C balanced in terms of simulated storage changes between the NMA and CMA and SMA?
- Figure 6. Proposed Transfer Area. Are transfers from the SMA or CMA allowed to be moved to the NMA? Was this not the entire point of Scenario 1C?
- If no Carryover is allowed to be transferred among management zones, are some pumpers now going to be forced into over pumping penalties because of potential unavailability of carryover by transfer area?
- If a parcel is outside the transfer boundaries, are all these areas now exempt from drilling new wells? If the BWD or other entity wants to drill at say the Airport does this now exempt that possibility?

What if the SMA or CMA cannot achieve less than 5-foot drawdown in one area? Does this necessitate automatic reduction in Sustainable Yield even if NMA can sustain more pumping?

4.0 Conclusions

The NMA and CMA are connected in the subsurface. The BVHM suggests recovery of groundwater levels in the NMA under Scenario 1A (Figure 1) will result in an increase in subsurface exchange between then NMA and CMA (i.e. the post-development gradient will switch back to the natural pre-development gradient in the Subbasin). The BVHM Scenario 1A model suggests that by 2030, the net flux from NMA to CMA will be positive for the first time in decades and that by 2040 this flux will be approximately positive 1,000 AFY compared to negative 2,000 AFY at the start of SGMA implementation. For reference, over the past five water years pumping in the NMA has reduced by 4,308 AF (Table 2) and additional WY 2026 reductions are anticipated based on mid-year reporting. This accelerated reduction in pumping beyond what is required in the rampdown may result in accelerated net subsurface flux of groundwater between the NMA and CMA as it is no longer being captured by NMA pumping. Comparison of WY 2025 pumping to WY 2040 and Beyond Annual Allocation (Tables 1 and 2) indicates that the CMA and SMA are currently pumping at approximately the WY 2040 and Beyond Annual Allocation and that future reductions in pumping are expected to occur predominantly in the NMA where an additional approximate 2,400 AFY of pumping will need to be reduced based on comparison of WY 2025 pumping

and WY 2040 and Beyond Annual Allocation. Based on reasonable, evidenced-based concern that the Permanent Transfer or Lease will cause or exacerbate *Undesirable Results*, we offer the following items that should be considered in the framework:

- In addition to BVHM model runs and resulting groundwater level changes over the 30-year period from 2040 to 2070, empirical data must be continually evaluated in accordance with the Judgment and greater weight placed on measured outcomes rather than future predictions. The framework should indicate how newly observed data will be incorporated including recognition of model validation through comparison of observed and simulated data.

- Explicitly state how the adaptive management approach outlined in the Judgment, under which Sustainable Yield, carryover, and SMCs are evaluated on a five-year basis will be incorporated.

Provide pumpers the opportunity to present additional information and data that may be pertinent to the transfer analysis on a case-by-case basis.

- Consider all applicable sustainability indicators identified in the Subbasin when evaluating transfers in terms of potential to cause or exacerbate *Undesirable Results*.

- Consider unintended consequences of limiting transfers to three transfer areas that may result unnecessarily in additional pumping penalties because carryover is unavailable in a given transfer area, delay in fallowing remediation and stranded water rights.

- Consider temporary leases of BPA or carryover among management areas rather than permanent transfers that would require evaluation on a 5 year cycle.

- Initiate PMA-6: Intra-Subbasin Water Transfers in the Borrego Springs Subbasin which is one of the six PMAs identified in the Groundwater Management Plan. PMA-6 was proposed to establish a mechanism for transferring pumping allocations between groundwater users inside the Subbasin to improve flexibility, support economic activity, and help meet SGMA sustainability requirements.

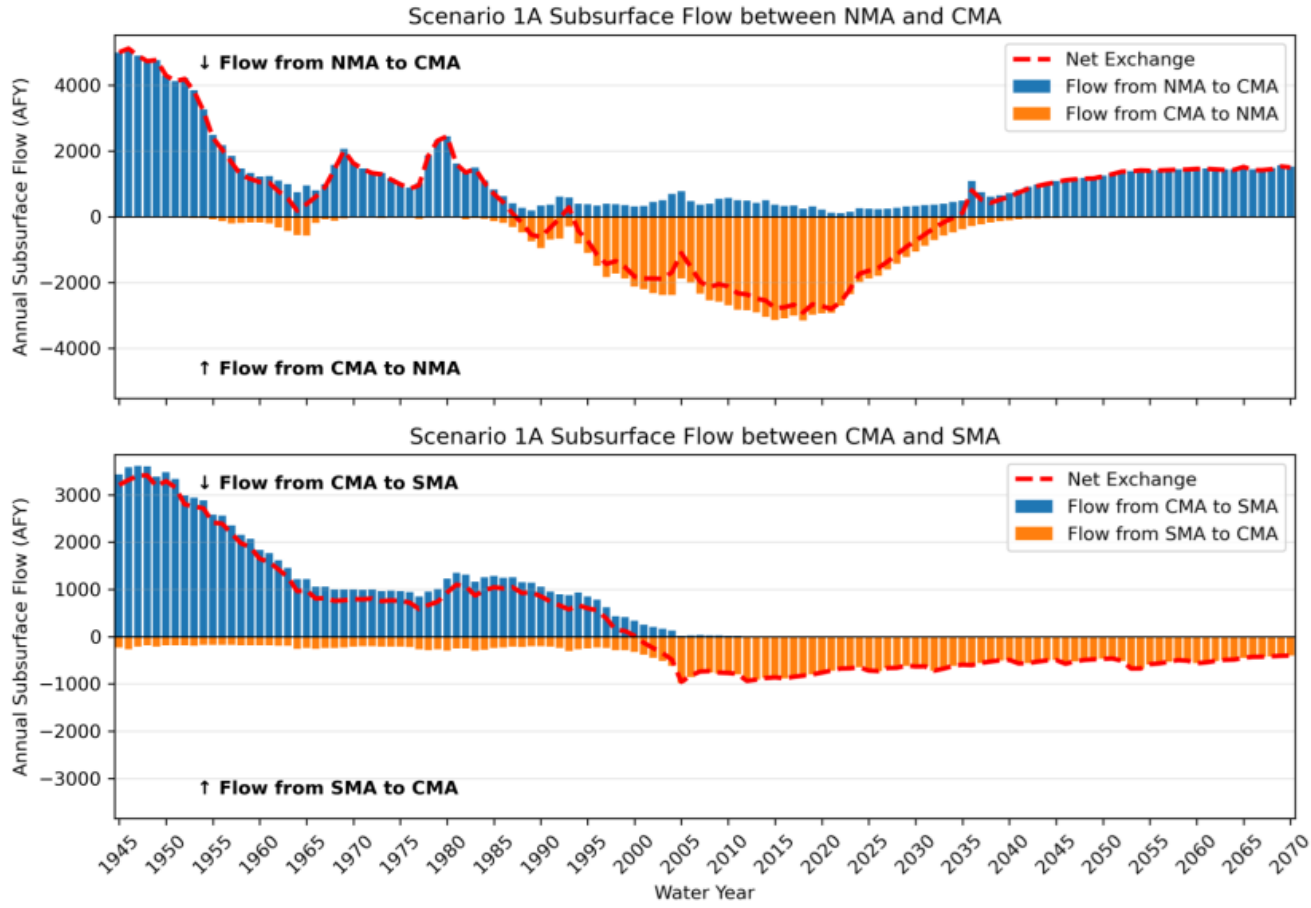

Figure 1. Scenario 1A Subsurface Flow Between NMA and CMA and CMA and SMA (West Yost 2026)

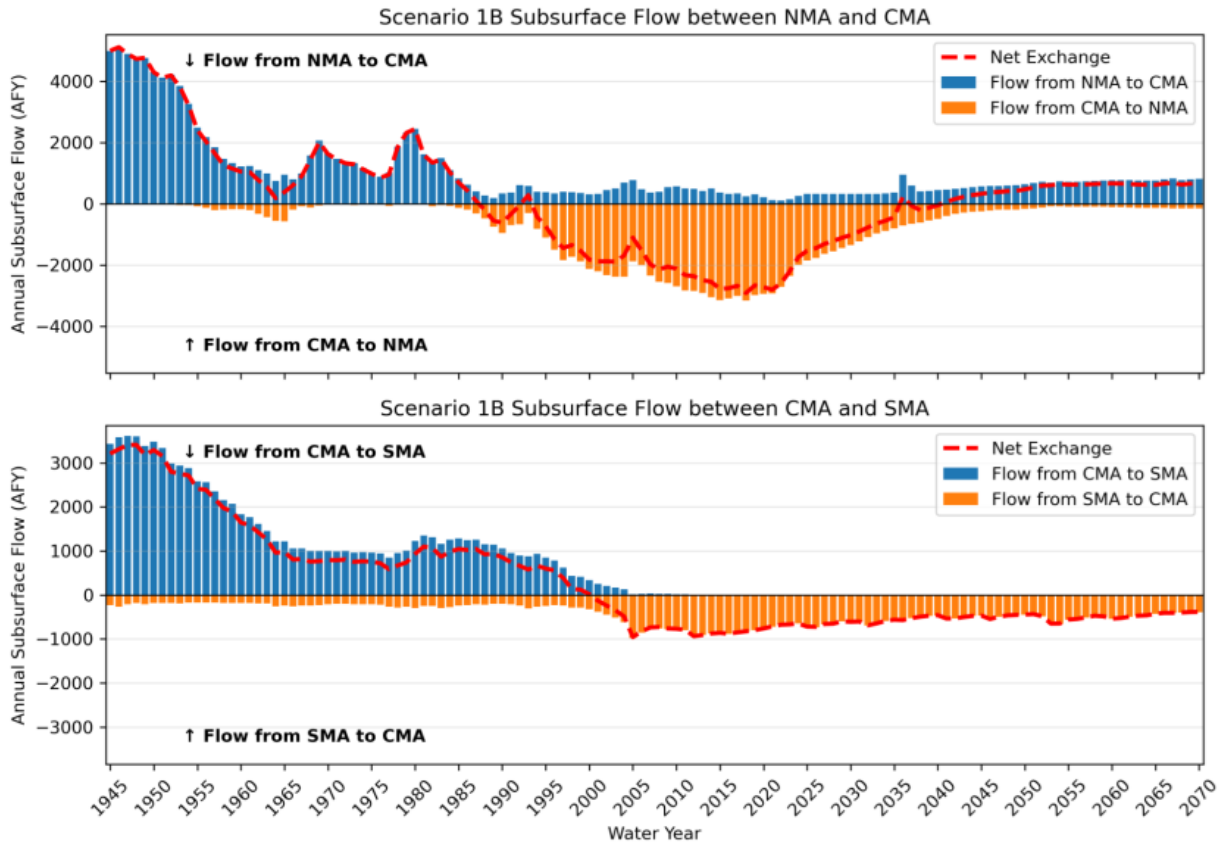

Figure 2. Scenario 1B Subsurface Flow Between NMA and CMA and CMA and SMA (West Yost 2026)

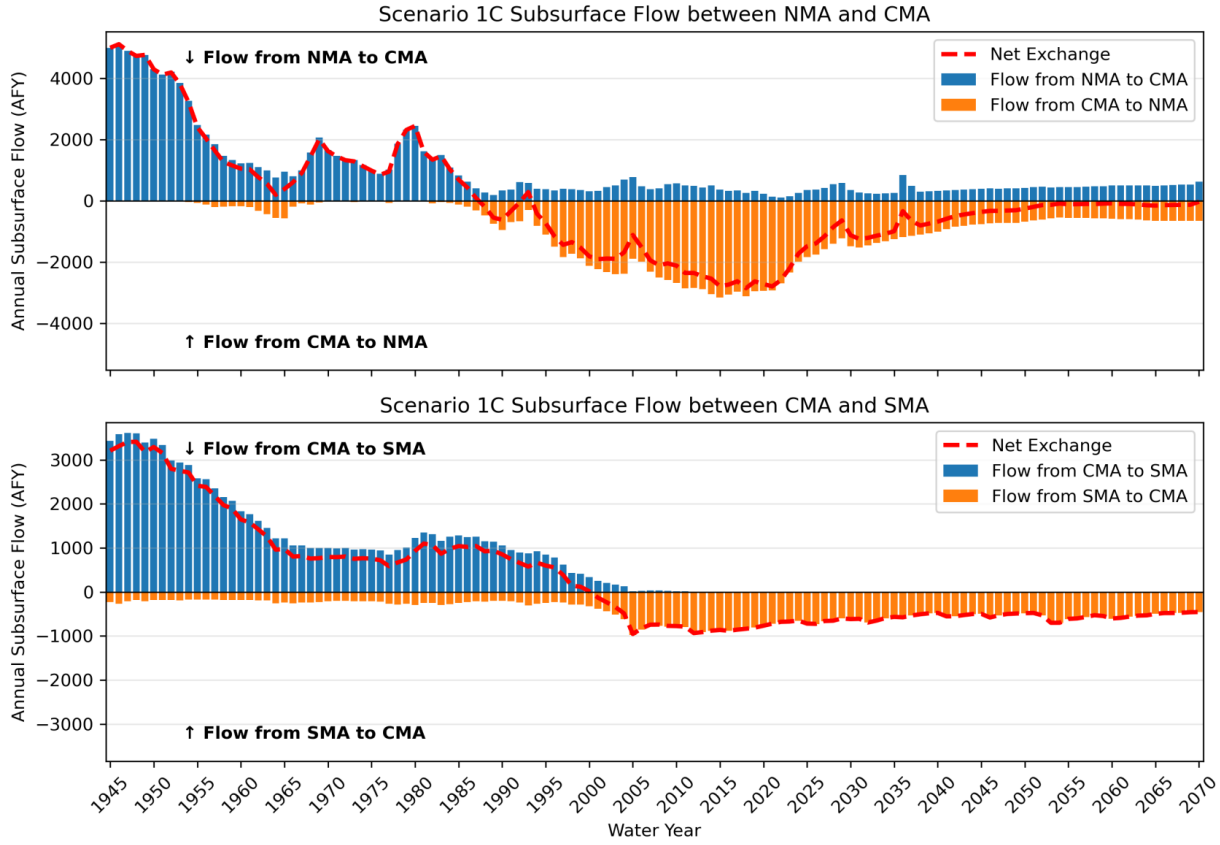

Figure 3. Scenario 1C Subsurface Flow Between NMA and CMA and CMA and SMA (West Yost 2026)

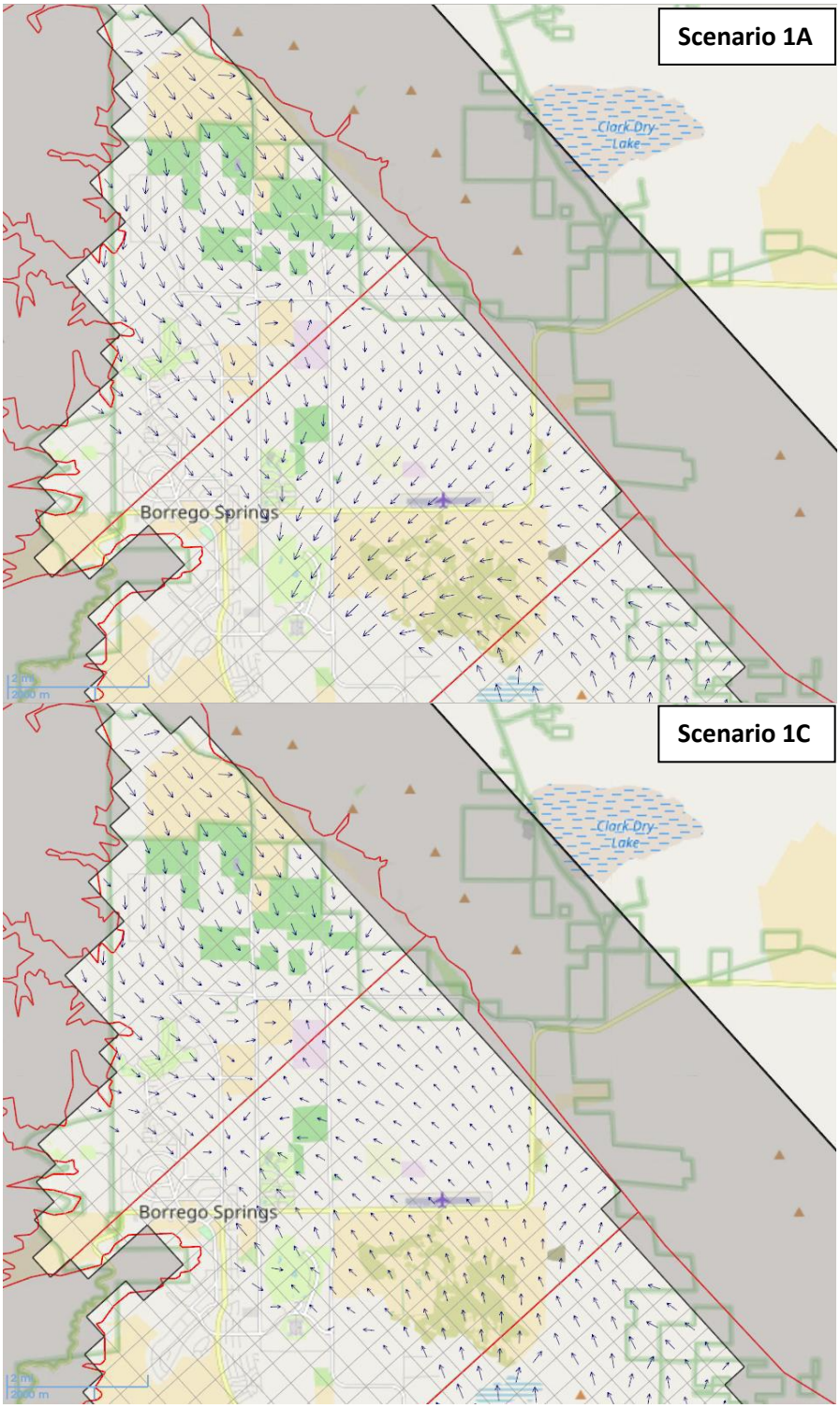

Figure 4. Scenario 1A and 1C Flow Vectors (West Yost 2026). Note in Scenario 1C Pumping in NMA captures flow that would otherwise flow through the area identified with potential groundwater dependent ecosystems

Figure 2. Average Pumping from 2040 to 2070 vs. Annual Allocation, by Management Area

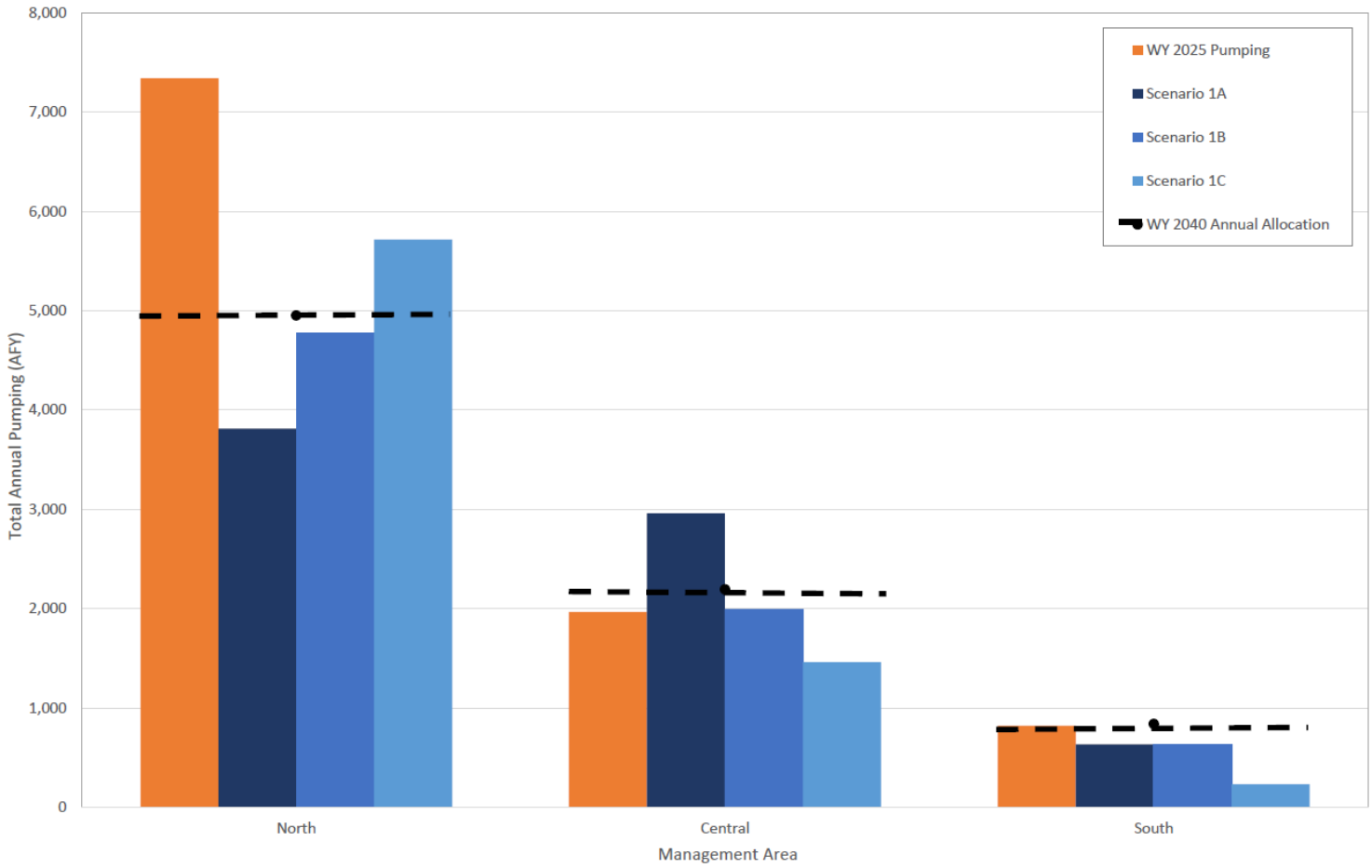

Figure 5. Average Pumping from 2040 to 2070 vs. Annual Allocation, by Management Area (West Yost 2026)

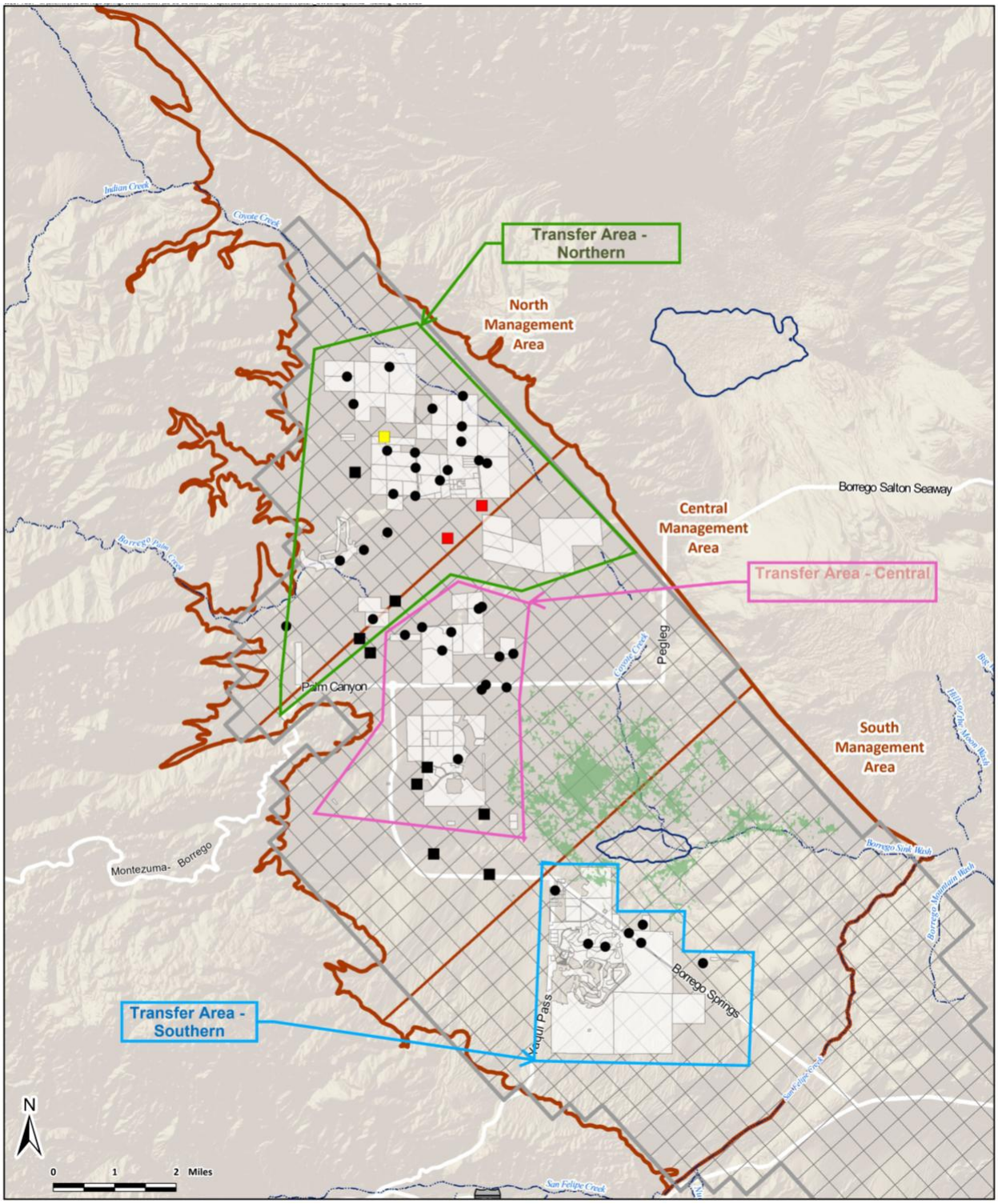

Figure 6. Proposed Transfer Areas

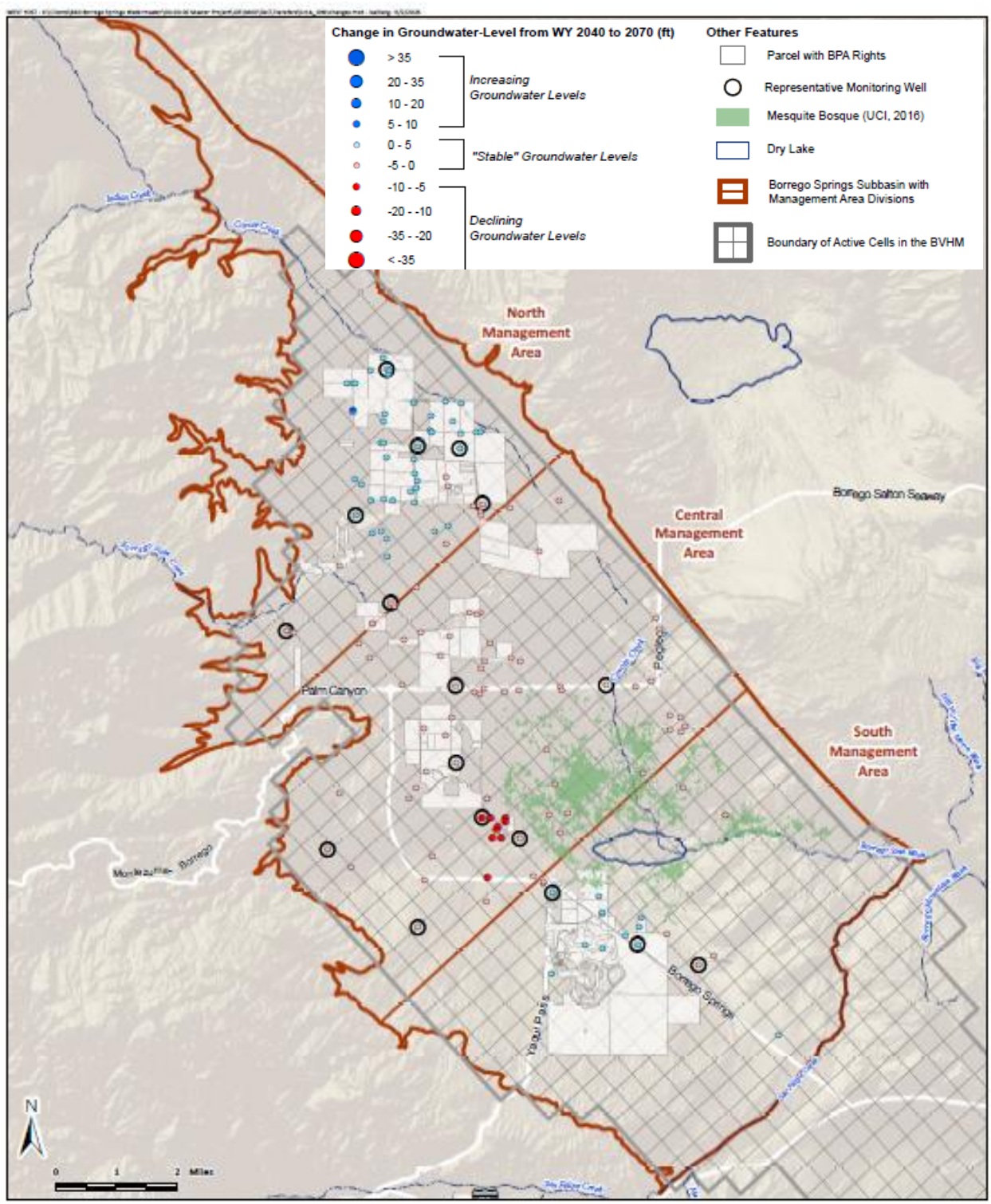

Figure 7. Scenario 1C Cumulative Change in Groundwater-Levels WY 2040 to WY 2070 (West Yost 2026)

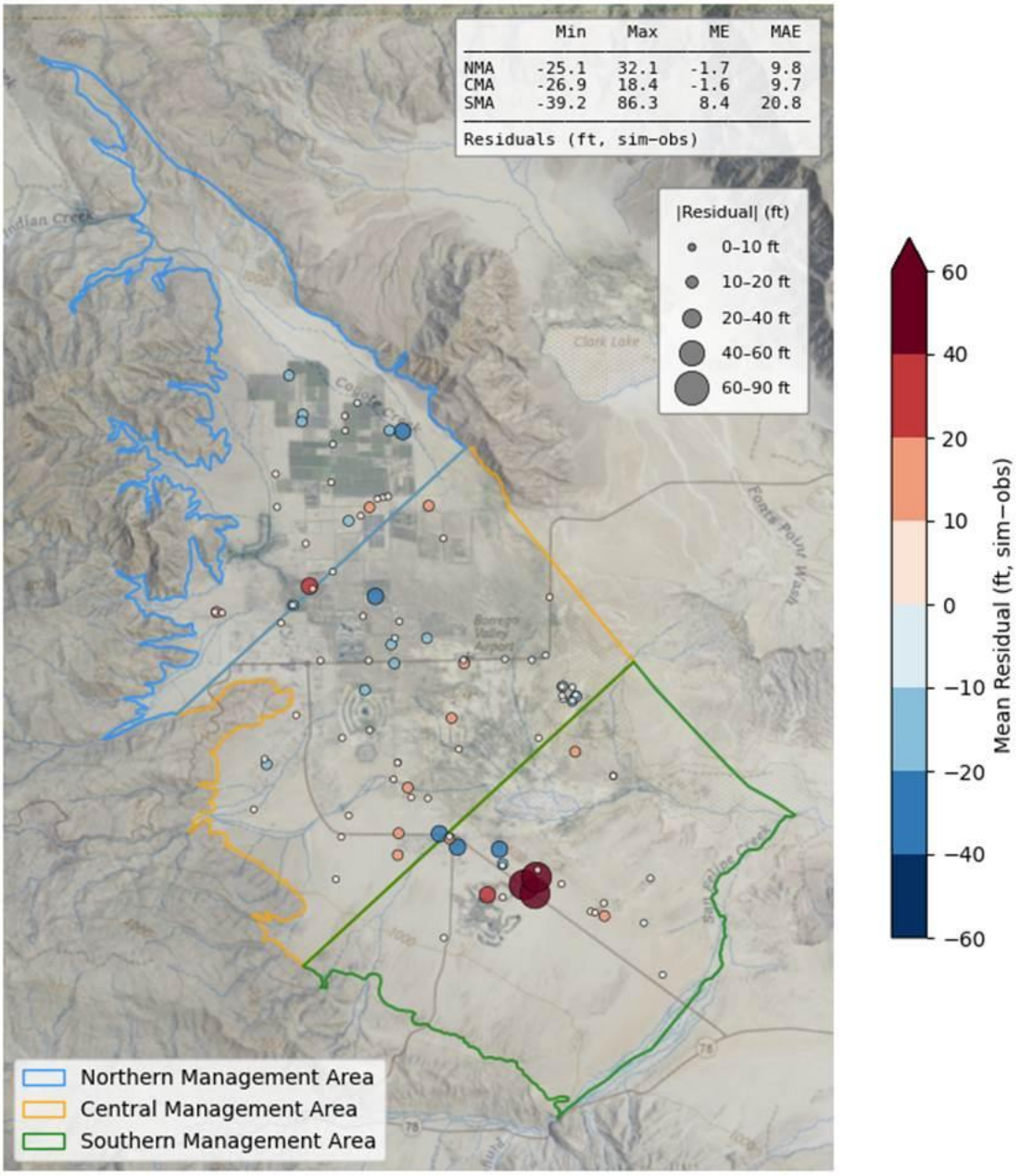

Figure 8. Spatial distribution of mean groundwater level residuals (simulated minus observed, in feet) at observation wells in the Borrego Valley, by management area. Circle size indicates the magnitude of the absolute residual; circle color indicates the sign and magnitude of the mean residual (red = simulated exceeds observed; blue = observed exceeds simulated). Summary statistics by management area are inset (ME = mean error; MAE = mean absolute error). The SMA exhibits substantially larger residuals (MAE = 20.8 ft; maximum = 86.3 ft) compared to the NMA and CMA (MAE ≈ 9.8 ft and 9.7 ft, respectively), likely driven by the model's failure to represent transient drawdown responses that are indicative of confined aquifer conditions. A positive mean error in the SMA (ME = 8.4 ft) indicates the model systematically overestimates groundwater levels in the SMA.

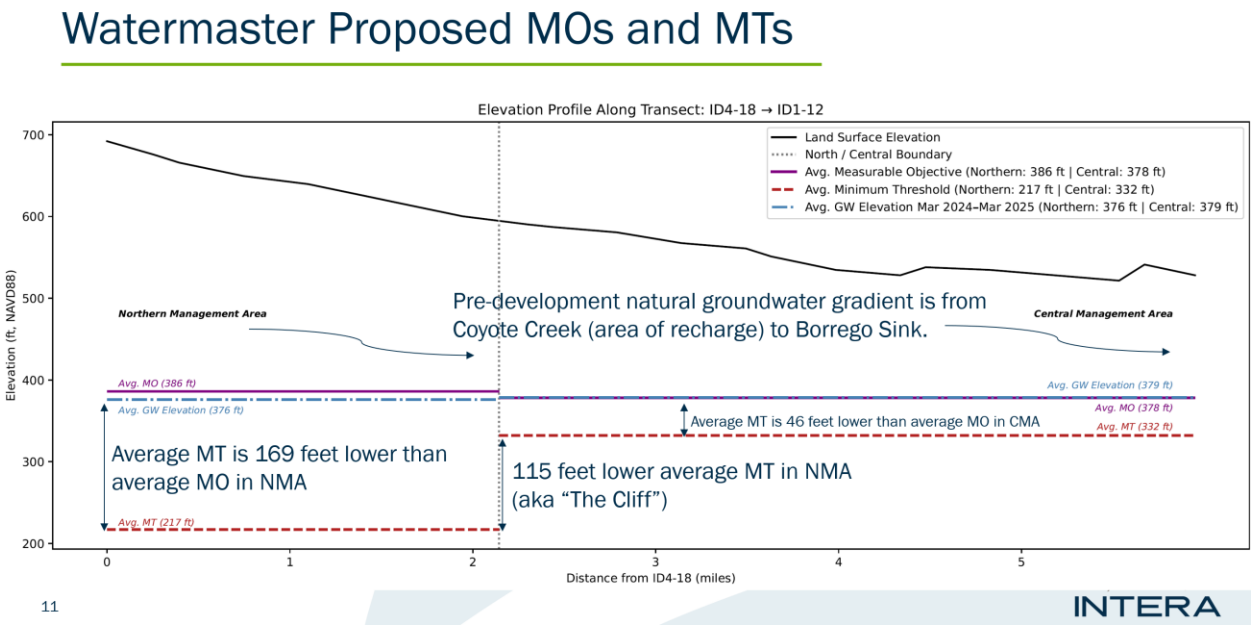

Figure 9. Conceptual model of average proposed MTs and MOs. Excerpt from presentation by T. Driscoll at the in-person 5-Year Groundwater Management Plan (GMP) Assessment and Update Workshop (March 17-18, 2026).

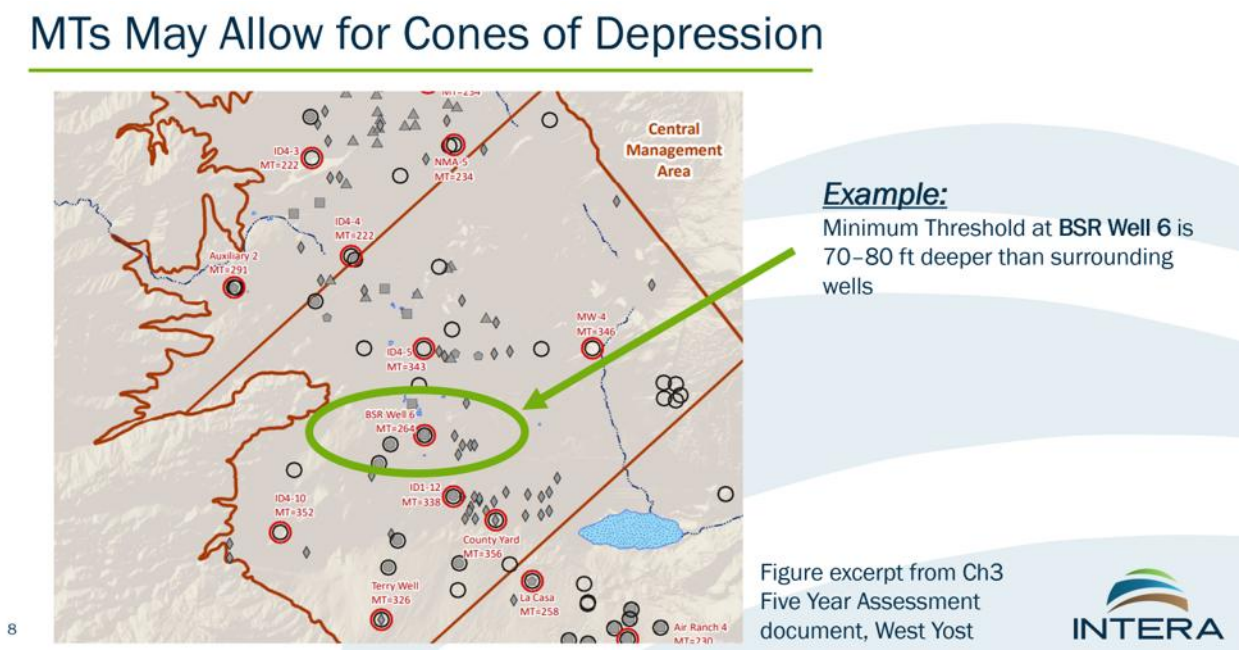

Figure 10. Map of proposed MTs in the CMA. Excerpt from presentation by Y. Pasner and T. Driscoll at the Borrego Water District Special Board Meeting (April 7, 2026)

Tabel 1. WY 2040 and Beyond Annual Allocation and Percent by Management Area.

Management Area	Total Annual Allocation AFY	Total Annual Allocation Percent
North	4,955	62%
Central	1,350	17%
South	840	11%
Unassigned	852	11%
Total	**7,997**	**100%**

Notes: If all unassigned pumping is used in the CMA then the Annual allocation would be 2,202 AFY.

Tabel 2. Pumping in the Borrego Springs Subbasin, by Management Area (WY 2021 - 2025)

Management Area	Annual Pumping (acre-feet)					Average	WY 2025 minus WY 2021
	WY 2021	WY 2022	WY 2023	WY 2024	WY 2025		
North	11,650	10,376	8,037	8,244	7,342	9,130	**-4,308**
Central	1,859	1,875	1,709	1,929	1,966	1,868	**107**
South	830	657	531	720	820	711	**-9**
Total	**14,338**	**12,909**	**10,276**	**10,892**	**10,129**	**11,709**	**-4,209**

Notes: As calculated and reported during the annual Water Rights Accounting process. Negative values indicate a reduction in pumping by management area.

County of San Diego, Planning & Development Services
Sustainability Planning Division

Memorandum

TO: Lauren Salberg and Andy Malone, West Yost

FROM: Jim Bennett, Water Resources Manager

SUBJECT: County Comments from TAC Meeting on Water Rights Transfer Restrictions

DATE: June 16, 2026

These comments are in response to West Yost technical memorandum titled Request for TAC Input on Technical Analysis of Water Rights Transfer Restrictions, dated June 5, 2026.

Comment 1: Scenario 1B and Sufficiency of Existing BVHM Analysis

Scenario 1B is a reasonable approximation of the Judgment-allowed pumping distribution at the GMP Management Area scale for purposes of this transfer analysis. It is not a true Judgment scenario, but it is close enough to evaluate whether transfers should be limited at this time.

A separate BVHM run using the full Judgment-allowed pumping volume does not appear necessary for the proposed initial transfer framework. Scenario 1B uses slightly less pumping than the Judgment allows in each Management Area but follows a similar overall distribution. The modest difference between Scenario 1B and the full Judgment-allowed pumping volume is not expected to change the basic technical conclusions regarding the proposed initial transfer framework.

Comment 2: Technical Basis for Restricting Transfers Into Central/Southern Transfer Areas

The existing BVHM results provide technical support for restricting transfers into the central and southern management areas. Scenario 1B reasonably approximates Judgment-allowed pumping at the GMP management area scale and still shows projected groundwater-level declines in these areas.

For the Southern Management Area, current pumping roughly approximates the 2040 allowable allocation, and observed groundwater-level declines are still occurring. Although the BVHM has known limitations in the Southern Management Area, the model results and observed groundwater-level trends support restricting additional BPA,

leased allocation, or carryover rights from moving into the Southern Transfer Area at this time.

Comment 3: Framing the Northern Transfer Area Restriction

The memo appropriately distinguishes the rationale for restricting transfers into the Northern Transfer Area from the rationale for restricting transfers into the Central and Southern Transfer Areas. The existing BVHM results indicate that the Judgment-allowed pumping distribution may not be sustainable in the Central and Southern areas without shifting more pumping to the North.

For that reason, the proposed restriction on transfers into the Northern Transfer Area is technically supportable as an interim measure while available northern capacity and potential PMA No. 6 implementation are further evaluated to ensure equitable treatment of all pumpers with water rights.

Comment 4: Parcel-Based Transfer Areas

The use of parcel-based Transfer Areas is technically reasonable for the proposed initial framework. Transfers are tied to BPA parcels and water rights, so a parcel-based approach is practical when considered together with modeled pumping locations and projected groundwater-level responses.

One clarification is requested. Figure 6, Proposed Transfer Areas, includes four BPA parcels in the far north/northeast portion of the Central Management Area within the Northern Transfer Area. Please provide the technical basis for assigning those parcels to the Northern Transfer Area not included in the Central Transfer Area.

Comment 5: Clarification on Groundwater-Level Stability as a Transfer Review Screen

During the TAC meeting, County staff commented that basinwide sustainability should not be interpreted to require groundwater levels to be stable everywhere in the Basin at all times.

West Yost staff clarified that groundwater-level stability is being used here as a technical screen for water rights transfer review, not as a complete definition of basinwide sustainability. With that clarification, the approach is reasonable. For transfer review, it is appropriate to be conservative where the existing model results show continued groundwater-level decline under planned or Judgment pumping.

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June 19, 2026

MEMORANDUM

To: Andy Malone, West Yost- Borrego Subbasin Watermaster
From: Tom Watson, Bob Abrams

Subject: Proposed Watermaster Transfer Framework
Project Borrego Subbasin TAC
Project No.: 061-01

The Watermaster has requested TAC input on the technical sufficiency of the analysis relied upon to develop the proposed transfer restriction framework. Specifically, TAC input is requested on the following seven questions:

1. *Do the existing BVHM projection results provide a sufficient technical basis to conclude that pumping location materially affects whether groundwater levels will stabilize after 2040?*

   The subject simulation scenarios (i.e., 1A, 1B, 1C) demonstrate that Subbasin groundwater levels would likely vary significantly based on location of extraction. Also, please see response to question #2, below.

2. *Is it technically reasonable to use Scenario 1B as an approximation of Judgment-allowed pumping distribution at the GMP Management Area scale for purposes of this analysis?*

   While it is technically feasible to use scenario 1B as a surrogate for Judgment-allowed pumping to estimate groundwater pumping distribution to 2040, there are some potential policy limitations that should be considered. For example, 1B is based on future Subbasin pumping that is in total approximately up to 7% less than the adjudicated rights on an annual basis (i.e., ~540 AFY). Over the extended SGMA implementation period (i.e., 2040 to 2070), this represents over 16,000 AF that, if pumped, could have a material effect on Management Area and Subbasin sustainability.

3. *Do the existing BVHM results support the conclusion that increasing the pumping capacity beyond the current BPA rights within the Central and Southern Transfer Areas could cause or exacerbate projected chronic lowering of groundwater levels after 2040?*

   Yes. The existing BVHM results clearly show that granting increases to the pumping capacity beyond the current BPA rights in the Central Transfer Area and Southern Transfer Area (CTA and STA, respectively) would contribute to the chronic lowering of groundwater levels after 2040 in these two areas. Scenario 1B demonstrates that pumping at less than the 2040 Judgment-allowed pumping causes declining groundwater levels in the CTA and STA. Further, Scenario 1C, with lower pumping in the CTA than Scenario 1B, indicates continuing declines in the CTA.

4. *Do the existing BVHM results support the conclusion that the northern portion of the Basin has greater physical capacity to support pumping than the central and southern portions?*

   Yes. The existing BVHM results support the conclusion that the northern portion of the Basin has greater pumping capacity than the central and southern portions. All three scenarios show increasing or relatively stable groundwater levels in the NMA.

5. *Is the proposed use of parcel-based Transfer Areas technically reasonable, given the location of BPA parcels, modeled pumping wells, and projected groundwater-level responses?*

   Yes. The proposed use of parcel-based Transfer Areas is technically feasible as the Transfer Areas encompass all BPA parcels. However, it is not clear why the BPA parcels in the northeast portion of the CMA are included in the NTA, when the current BVMH results indicate that increased pumping in the CMA could be detrimental. Further, as a separate policy matter for others, given that Judgment models may result in a different parcel-based Transfer Area(s), and given that transfers are not revocable, approving transfers proximate to these parcel-based areas may have an unintended consequence of compromising established adjudicated rights**.**

6. *Are there technical flaws in the analysis that would impact Staff's conclusion that transfers be limited to within each of the three Transfer Areas?*

   Please see responses to responses to questions #2, and #5.

7. *Are there additional analyses that are necessary before the Board could rely on the proposed transfer restriction framework?*

   A base line model run utilizing adjudicated rights by location and quantity would increase the confidence before making these important and irreversible decisions. The Watermaster policy requires the use of "*best available records and data*" to support the implementation of the Subbasin Judgment.
   As an initial step the Watermaster should consider moving the BPA parcels in the northeast portion of the CMA to the CTA.

To: Board of Directors

From: Samantha Adams, Executive Director

Date: June 19, 2026

Subject: Executive Director Report – June 2026

OVERVIEW

The purpose of the monthly Executive Director (ED) Report is to share information with the Board on the status of key administrative items, including identifying recommended items for future discussion and action. At our June 24, 2026, Special Board meeting, I intend to report out on the following items. Some information for each item is provided herein, where available. Additional details and topics that arise after publishing this report may be presented during the meeting.

At the June 24, 2026 Special Board meeting, I intend to report on the following topics:

- Annual Meter Verifications
- Pumping Assessments for WY 2026
- BPA and Party Updates

ANNUAL METER VERIFICATIONS

- Results of meter testing were reported in April 2026. Since May, four additional tests (2 Parties) were submitted and all four wells were in compliance with accuracy standards.
- Watermaster is still awaiting results from one Party's well. Watermaster staff continues to follow up with the owner to remind them the well must be tested and results reported to remain in good standing with the Watermaster.

PUMPING ASSESSMENTS FOR WY 2026

- The first installment invoices for the WY 2026 Pumping Assessments, totaling $175,024, were issued in November 2025, with payments due by December 31, 2025.
    - As of this writing, a total of $173,712 has been received and the outstanding balance of payments past-due is $1,312 across two Parties. One Party is working with Watermaster staff to resolve payment ASAP.
    - Reminders of past-due payments were sent to Parties the week of May 11th.
- The second installment invoices for the WY 2026 Pumping Assessments, totaling $175,024 were issued in May 2026, with payment due by June 30, 2026. As of this writing, $50,265 has been received.
- The annual invoices for manual meter read services was issued together with the WY 2026 Pumping Assessments, totaling $10,213.92. As of this writing, $4,043 has been received.

BPA AND PARTY UPDATES

- There remains one Party, with an assumed annual pumping of 1.2 afy based on water duty methods, that is out of compliance with the Judgment and not in contact with Watermaster:
    - The current outstanding balance owed to Watermaster is now $412.55.

Borrego Springs Watermaster
Board of Directors Meeting
June 24, 2026
AGENDA ITEM VI

To: Board of Directors

From: Samantha Adams, Executive Director

Date: June 19, 2026

Subject: Establishing Agenda for August 19, 2026 Regular Board Meeting

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Process

To set the August agenda, the Board will:

1. Review the initial August agenda topics planned by Staff, as listed below
2. Review the October and December tentative topics planned by Staff and previously requested items by Board members, as listed below
3. List out additional items that have arisen during the June 2026 Special Board meeting (such as during public comment)
4. Call on Directors to request additional items for consideration of inclusion on the August 2026 or other future agenda
5. Consider motion(s) to approve the agenda (the agenda can be approved in a single motion or multiple motions to cover each item). The Agenda/items are approved by majority vote (3 of 5 directors)

Staff's Initial Agenda for August Regular Meeting

Staff recommended, and the Board agreed at its June 3, 2026 Special Board Meeting, that the July 2026 Board meeting be canceled due to holding two meetings in June 2026. Therefore, the next meeting of the Watermaster Board will be a Regular Board Meeting held on August 19, 2026.

The August 19, 2026 Regular meeting (held virtually) will include all standard items of: public correspondence, consent calendar (meeting minutes, financial reports, staff invoices, etc.), verbal Staff and Chair reports, establishing the agenda for the subsequent meeting, Board member comments, listing of future meeting dates, and adjournment.

In addition to the standard items, the initial agenda planned by Staff for August 2026 includes the following business items for consideration and possible action:

1. Review Legal Opinion on SGMA Requirements for GDEs, including consideration of whether the UCI GDE Study Report is "best available science" that can be relied on to make policy or adapt management actions

2. Technical Review of Transfers
3. Spring 2026 Groundwater Monitoring Results
4. WY 2026 – Q3 Budget Status Report (as of June 30, 2026)
5. WY 2027 Meeting Schedule and Priorities

Topics for Future Board Meetings

Given the reduction in meeting dates in WY 2027, Staff will work on developing a schedule of meeting dates and topics to discuss during WY 2027 Board meetings. The proposed schedule will be presented at the August Board meeting, as noted above.