



November 18, 2010

State of California  
Department of Water Resources  
California Statewide Groundwater Elevation Monitoring Program

Subject: Draft Guidelines and Procedures (October 2010)

Kaweah Delta Water Conservation District has reviewed and herein provides comments to the following California Statewide Groundwater Elevation Monitoring (CASGEM) Program documents recently released by the Department of Water Resource (DWR).

**Procedures for Monitoring Entity Reporting (October 2010)**

The reporting requirements for what is referred to as "Well Name", local well designation or local station ID for the corresponding reporting sections referred as "Monitoring Sites and Timing", "Data Reporting", "Well Information" and "Groundwater Elevation Information" is unnecessary. DWR has a well established identification system, known as State Well Numbering (SWN), which provides an individual and unique identification for any and all groundwater monitoring locations. Creating and reporting another identifier is redundant and would lead to more work by both DWR and the monitoring entity. More importantly there is sure to be a degree of inconsistency between the two identifiers that will provide uncertainty to the data. The District strongly recommends that only the SWN in association with the existing agency identification system be utilized for reporting purposes. Additionally, the method for assigning such numbering could be made more efficient through a possible automated internet/website application as opposed to the current assignment method employed by DWR.

**Groundwater Elevation Monitoring Guidelines (October 2010)**

The District understands that these guidelines are intended for DWR usage and are not required of the local monitoring entities. Please then careful consider that in light that the majority of Land Surface Datum (LSD) and Reference Point (RP) are established based upon USGS 7.5' quadrangle maps at a normal estimated elevation accuracy of  $\pm 2.5$  feet for 5 foot contour intervals. Based on this level of accuracy a required groundwater elevation measurement accuracy of no greater than  $\pm 0.1$  feet is reasonable and applicable for most measurement methods to be used in analyzing/reporting groundwater supply conditions. Knowing that instrumentation is capable to measure higher accuracies does not necessitate the need to require such precision. Miles are not measured to the nearest fraction of an inch when you what to know how far you have come or need to go.

Respectfully,

A handwritten signature in blue ink, appearing to read "Larry Dotson".

Larry Dotson  
Senior Engineer