
From: Rob Swartz [mailto:rswartz@rwah2o.org]
Sent: Friday, November 19, 2010 11:13 AM
To: GWElev-Support@water.ca.gov
Cc: John Woodling; Rob Swartz; Walter Sadler; Robert Roscoe
Subject: CASGEM Procedures Comments

Hello,

On behalf of the Sacramento Groundwater Authority (SGA), we appreciate the opportunity to comment on the draft CASGEM documents prepared by DWR. SGA is a joint powers authority formed in 1998 to manage the groundwater basin underlying Sacramento County north of the American River. SGA intends to submit as the Monitoring Entity for its management area by January 1, 2011.

In the Draft Procedures for Monitoring Entity Reporting, we have the following comment. On Page 9 of the document, the language is either very unclear or appears to be otherwise inconsistent with SB6. The following language gives us great concern:

“In some basins DWR currently does most, if not all, of the water-level monitoring. In these basins, a local entity still needs to notify DWR of their intent to become the Monitoring Entity and must show that they have the capability to take over the DWR monitoring network.”

DWR’s language would seem to indicate that it is their intent to have the Monitoring Entity assume responsibility for the DWR monitoring network within the Monitoring Entity’s area. This is clearly not the intent of the legislation as noted in Water Code Section 10920(b), which states:

“It is further the intent of the Legislature that the department continue to maintain its current network of monitoring wells, including groundwater elevation and groundwater quality monitoring wells, and that the department continue to coordinate monitoring with local entities.”

Additionally, the law states, in Section 10931(b)(2), “The department may not require additional monitoring wells unless funds are provided for that purpose,” indicating that it was not the intent of the legislature for DWR actions to place a financial burden on local monitoring entities.

We believe that the intent of the legislation is to identify a responsible Monitoring Entity that will work with DWR to identify an appropriate network and monitoring protocols to adequately assess the basin. Depending upon the results of developing the monitoring plan, the Monitoring Entity may have specific wells that it will monitor directly and may coordinate with other entities within the basin (e.g., local water agencies) to contribute additional data that would complement the existing DWR monitoring. It is also possible that some current DWR monitoring could be eliminated during the assessment and development of the monitoring plan. However, it should not be assumed that the Monitoring Entity should have the responsibility of monitoring wells currently monitored by DWR. Unfortunately, the language on Page 9 would seem to indicate

this situation. We request that DWR modify this draft language to ensure that is consistent with the intent of the legislation.

The following language is proposed:

“In some basins DWR currently does most, if not all, of the water-level monitoring. In these basins, a local entity still needs to notify DWR of their intent to become the Monitoring Entity. While the legislation required DWR to continue its monitoring programs, the Monitoring Entity must commit to re-evaluate its monitoring network if DWR discontinues monitoring for any reason.”

Again, thank you for the opportunity to comment. We look forward to working with DWR on the monitoring program.

Rob

Robert J. Swartz, PG, CHG
Regional Water Authority
Sacramento Groundwater Authority
5620 Birdcage Street, Suite 180
Citrus Heights, CA 95610
(916) 967-7692
(916) 967-7322 Fax