



Santa Barbara County Public Works Department
Flood Control & Water Agency

Ms. Paula Landis, Chief
California Department of Water Resources
P.O. Box 942836
Sacramento, Ca. 94236-0001

November 22, 2010

RE: Comments on DWR CASGEM *Procedures for Monitoring Entity Reporting, DRAFT, October 2010*

Dear Ms. Landis and CASGEM Coordinators,

We appreciate the opportunity to comment on the CASGEM Program Guidelines and provide a number of comments below. Santa Barbara County Water Agency is an Eligible Entity in accordance with No. 6 of the "Requirements to Become Monitoring Entity" of the Draft Procedures for Monitoring Entity Reporting. These comments are in regard to the CASGEM Draft Procedures for Monitoring Entity Reporting.

Note that these comments were prepared with input from several eligible monitoring entities within Santa Barbara County.

General Comments:

1. The schedule for designation of monitoring entities, submittal of monitoring plans, and initial rounds of monitoring is too compressed. Some entities will need to secure funding for personnel, training, equipment, and reporting. In addition, contacts with property owners and legal documents necessary for Right of Entries will take time to secure, if needed. Furthermore, the schedule does not allow adequate time for discussion and collaboration among potential monitoring entities.
2. DWR must consider the existing groundwater monitoring programs now conducted by the USGS in cooperation with local Water Agencies and Districts. On page four, paragraph two of the DRAFT document, it states "The CASGEM program will **rely and build** on the many established long-term groundwater monitoring and management programs". The focus of CASGEM should be basins in the State that are not currently being monitored, not those that are adequately monitored.

In order to avoid costly and time intensive duplicative measures, DWR's database should be coordinated with that of the USGS to directly import or link to, through the USGS Waterdata website, the vast amount of data that is already collected and made available through cooperative programs throughout the State and for which many entities are already

paying. Ideally, basins in which the USGS is already conducting adequate monitoring programs should be exempt from the requirements of this legislation.

3. Withholding State Funding to encourage volunteering for monitoring of a basin is a counter productive measure. Entities that do not volunteer will likely do so due to a lack of resources, staff, and finances. Excluding those entities from opportunities through State programs will only decrease their ability to participate in future.

Is the withholding of funds a certainty as appears to be indicated in Senate Bill No. 6(1) of the legislation or a possibility as implied on several occasions within the guidelines? If a possibility, how will the decision whether to exclude an entity from State funding ultimately be made?

In the event that a specific basin has more than one eligible entity and none volunteer to implement the program, will all eligible entities be subject to ineligibility for State funds? In a case where an overarching entity has jurisdiction over, or involvement with, multiple other entities, this system of penalty could result in the rendering of the overarching entity unable to perform beneficial tasks for entities that are unrelated to the monitoring program. For example, if a county conducts an IRWM Grant program on behalf of several water districts and the county is unable or unwilling to perform the monitoring of a basin within it, then all water districts participating in the IRWM program would suffer the consequences of the county losing the potential for State funds. This would unjustifiably penalize some jurisdictions that are not involved in groundwater monitoring.

4. DWR should produce and distribute their database prior to asking for a commitment from eligible entities as the nature and format of the information to be input to the database will have a large impact on the resources and time commitment required.

Specific Comments:

1. Monitoring Plans, Data Gaps (Pg 14).
This section describes data gaps that may be caused by lack of wells, access issues, etc. The last paragraph states, "If no local entity is *able* (emphasis added) and/or willing to fill a data gap, the department may be required to perform groundwater management functions. If DWR performs this monitoring, local agencies and the county...would be potentially ineligible for a water grant or loan awarded or administered by the state." It is unreasonable to withhold funding privileges for factors such as access to land that are beyond the control of an entity.
2. Well Information and Groundwater Elevation information, pg. 18 - 19.
There should be more flexibility in terms of monitoring requirements as long as deviations don't render the information insufficient for determining groundwater trends.
3. Introduction to CASGEM Program, pg. 4.
The document states "DWR will also continue measuring its current network of groundwater monitoring wells as funding allows". DWR should provide a list of all wells it currently measures as this will be relevant to entities developing monitoring plans.
4. Monitoring Sites and Timing, pg 15.
Paragraph three states that seasonal monitoring shall occur with at least two annual measurements to ascertain seasonal fluctuation. Many of the wells monitored in Santa Barbara

County are deep wells that do not fluctuate much seasonally. Therefore, multiple measurements per year should be required only when necessary to identify long term trends.

5. Field Methods, pg. 16 (and also in the Groundwater Monitoring Elevations Guidelines DRAFT). The Field Methods required by DWR should be the USGS National Field Manual, 2006.

Guidelines indicate a 24 hour offline period prior to well measurement. This may be impossible to achieve, particularly for wells belonging to private entities.

6. Page 18 and other places.

Required information includes State Well ID's and construction information on the well. This information should come from the state instead of the local monitoring entity as the state is responsible for assigning State Well ID's and maintaining copies of completion reports.

7. Monitoring Sites and Timing, pg 15

The guidelines state that public water supply wells should not be used for monitoring in accordance with this legislation. In some basins, this requirement may preclude the reporting of adequate information to identify basin trends.

In summary, the intent of SBX7-6 is to ensure that adequate GW level monitoring is occurring throughout all alluvial basins in the state and that that data is made generally available. As written, the guidelines would create duplicate data and unnecessarily consume resources of agencies that already have comprehensive programs in place. DWR should adjust the requirements of this program to focus on basins where monitoring is not already occurring.

Thank you again for the opportunity to comment on these guidelines. Feel free to contact me at mnaftal@cosbpw.net or (805) 568-3542 if you have any questions or need clarification.

Matt Naftaly



Water Agency Manager
Santa Barbara County Water Agency

Cc: Tim Ross, Department of Water Resources