

TULARE IRRIGATION DISTRICT

November 22, 2010

Mary Scruggs – Supervising Geologist, Div. of Integrated Regional Water Mgt.
California Department of Water Resources
1416 Ninth Street
Sacramento, California 94236

Subject: Comments on CASGEM Draft Documents

Dear Ms. Scruggs:

The District has reviewed the two draft documents “Procedures for Monitoring Entity Reporting” and “Groundwater Elevation Monitoring Guidelines” and hereby submits the following comments:

- The District has collaborated with ACWA in the preparation of its comments provided under separate cover this date and is in agreement with such comments and observations.
- The Procedures on page 15 make it reasonably clear that spring and fall measurements should suffice to capture seasonal and long-term trends in groundwater levels as asked for in SB7X 6. However, the Guidelines contain on page 8 thereof a short treatise on differences observed with level data taken at shorter, i.e. quarterly or monthly, intervals. The implication in this text seems to suggest that DWR may exercise judgment in determining whether or not the semi-annual practice is sufficient or not.

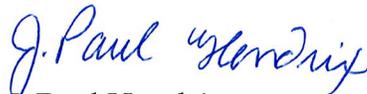
We note that this practice is widespread in the San Joaquin Valley and has historically been quite adequate to record basin recovery in the spring, prior to the upcoming pumping season, and to record the effects of that pumping in early fall after most wells are no longer in use. That there are intervening highs or lows in depths to groundwater occurring in between such seasonal readings does not, from our viewpoint, add much to the effort to obtain data reflecting the impacts of irrigated agriculture on an annual or long-term basis. Given the cost and staffing difficulties

associated with more frequent measuring intervals, we trust that the Procedures provide sufficient grounds to allow districts and Monitoring Entities to continue with their semi-annual data collection programs and be in compliance with the CASGEM program.

- The Procedures list, on page 18, the well information sought for groundwater monitoring networks. Noted as “Required (if available)” are screened intervals depths for monitoring wells. The District suggests this information be considered as “Desired” as opposed to any suggestion of a requirement. Screening data may only be obtained from Well Completion Reports and ACWA’s comments on this topic underscore the concern the District has in public dissemination of such Reports in any manner that would inhibit our ability to continue with our monitoring program utilizing private production wells.

Thank you for the opportunity to comment on the aforementioned draft documents associated with the CASGEM program.

Sincerely,



J. Paul Hendrix
General Manager