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November 22, 2010

Paula J. Landis, Chief
Division of Integrated Regional Water Management
Department of Water Resources
1416 Ninth Street, PO Box 942836
Sacramento, CA 94236-0001

Via email: GWElev-Support@water.ca.gov

Subject: Comments on Draft Guidelines and Procedures for the California Statewide Groundwater Elevation Monitoring (CASGEM) Program

Dear Ms. Landis:

The Vista Irrigation District (District) appreciates the opportunity to submit these comments on the October 2010 drafts of the “Groundwater Elevation Monitoring Guidelines” (Guidelines) and “CASGEM Procedures for Monitoring Entity Reporting” (Procedures) documents that have been made available on the Department of Water Resources (DWR) website (<http://www.water.ca.gov/groundwater/casgem/>).

The Vista Irrigation District is an irrigation district organized and incorporated under the Irrigation District Law of the State of California. We serve a population of about 125,000 residents within the City of Vista and parts of the Cities of Oceanside, San Marcos and Escondido, and part of the unincorporated County of San Diego, California.

About 20 miles northeast of our service area, the District owns about 43,000 acres (about 67 square miles) of land in the Warner Valley, overlying about 90 percent of the 37.5 square mile Bulletin 118 “Warner Valley Groundwater Basin”, Basin Number 9-08 (Basin). The District operates about a dozen water production wells in this Basin and maintains several dozen more monitoring wells. We have been keeping monthly records of the pumping and static water levels in our production and monitoring wells, respectively, since the early 1980’s. Hence we have reviewed DWR’s CASGEM Guidelines and Procedures with interest.

Both documents are comprehensive and thorough, and we have no constructive comment on the Guidelines. With respect to the Procedures, however, we would appreciate greater clarity on whether and under what conditions the DWR would accept the voluntary submission of groundwater monitoring

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records. The Procedures follow Water Code Section 10927 to define the entities which may assume responsibility for monitoring and reporting groundwater elevations. It does not appear that the District would qualify as any of the seven categories of entities described either under the Water Code or in the Procedures. Notwithstanding this, however, the District may be interested in assisting the DWR with the CASGEM program on a voluntary basis if it were clear that such participation was and would remain voluntary.

Thank you again for this opportunity to comment on the Draft Guidelines and Procedures. If I can be of any further assistance, please do not hesitate to contact me. I can be reached at (760) 597-3168 or at dsmith@vid-h2o.org.

Very truly yours,



Don A. Smith
Director of Water Resources

cc: Roy Coox
Angela Morrow