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Sent: Monday, November 22, 2010 4:28 PM
To: Groundwater Elevation Support
Cc: Tim O'Halloran; Brewster, Bill
Subject: CASGEM comments

As the lead agency for the Groundwater Monitoring Program of the Water Resources Association of Yolo County, the Yolo County Flood Control and Water Conservation District would like to comment on the draft [CASGEM Procedures for Monitoring Entity Reporting](#).

CASGEM Unique Well Identification plan

In Yolo County we strive to use the SWN (State Well Numbering) system for all data sharing needs and carefully use standard formatting of the SWN to insure compatibility with the State's Water Data Library and our own database, the Water Resources Information Database (WRID). Additionally, our State grant contracts require the use of the SWN system.

We understand that the SWN assignment system at DWR is a manual system. It is not computerized and depends on a bookcase of 75 three ring binders. The initiation of the CASGEM program seems like an ideal oppourtunity to computerize the assignment of SWN. In Yolo County we will continue to use the SWN system to identify our wells and we look forward to continued support from DWR in the management of this standardized and established system.

Use of Municipal Public Water Supply (PWS) Wells

The use of PWS wells is prohibited in the draft CASGEM plan. However, in Yolo County, many municiple PWS wells are our most important wells monitored in the County. Our municipal wells are PWS, yet the location of these wells is not confidential, maps with locations are published on the City of Davis and Woodland websites. In-fact, city residents are encourage to identify which well they live closest to and to look at water quality data specific to their neighborhood. Besides, as we understand it, DPH doesn't measure or collect data on groundwater levels, only water quality. The CASGEM program would not receive any water level data from DPH. The DPH confidentiality requirements would not apply, since CASGEM would not use any DPH data. In our Yolo County program, we receive monitoring data from many wells that are PWS, however, we receive the data directly from the well owner, not DPH.

Groundwater Basins and Subbasins

In Yolo County the subbasin boundaries do not match any political or jursisdictional boundaries. However, we understand the importance of identifying which basins and subbasins are being monitored, but we are unclear on how to ensure adequate coverage of a subbasin. We look to DWR for guidance on this issue.

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