



CITY OF
NEWMAN

April 15, 2015

California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236-0001
Attn: Craig Cross

RE: 2014 Water-Energy Grant Funding Program – Public Comment

Dear Mr. Cross:

The City of Newman (City) submitted an Application on December 12, 2014 in compliance with the funding program guidelines. Upon preliminary DWR review of received applications, the City Application was reviewed by the Division of Financial Assistance and deemed ineligible for Water-Energy Program funding based on the CASGEM compliance requirement (see DWR review comment below).

TECHNICAL REVIEW SUMMARY (CITY OF NEWMAN APPLICATION)

Ineligible applicant. The California Statewide Groundwater Elevation Monitoring (CASGEM) eligibility requirement is not met.

In preparing the Application the City conferred with the CASGEM Program and followed direction to address the issue as depicted in the attachment as part of the City's overall Application.

[http://www.water.ca.gov/waterenergygrant/2014Applications/City%20of%20Newman%20\(201418760046\)/Attachment%201%20-%20Att1_WE14_CON_EligDoc_2of3.pdf](http://www.water.ca.gov/waterenergygrant/2014Applications/City%20of%20Newman%20(201418760046)/Attachment%201%20-%20Att1_WE14_CON_EligDoc_2of3.pdf)

It is important to consider the context of how DWR has initially implemented the CASGEM Program, first focusing on areas and entities with established groundwater management activities and partnerships (primarily Groundwater entities and Water Districts).

Cities have generally not been targeted for compliance during the initial implementation period. This has left cities like Newman in a wait-and-see mode for compliance until DWR catches up with those entities contained in High and Medium Priority Unmonitored Groundwater areas. To the City's knowledge, it is not part of any established CASGEM compliance monitoring program or lead entity effort at this time.

There is a developed CASGEM program in northern Stanislaus County however it does not include any agencies in southern Stanislaus County where Newman is located. The CASGEM Program has very recently amended its implementation efforts to include public supply wells as follows:

Addendum to CASGEM Groundwater Elevation Monitoring Guidelines, describing the use of public supply wells for CASGEM monitoring (Posted 10/02/2014)

This addendum to the December 2010 Groundwater Elevation Monitoring Guidelines adds public supply wells as potential CASGEM monitoring wells, and describes the requirements for Monitoring Entities to utilize them in their CASGEM monitoring networks. The Addendum is available on the Documents and Outreach page, or by clicking [here](#).

This provision should help cities like Newman develop implementation strategies to comply with CASGEM in the near future. The City plans to comply with CASGEM as the program further develops in its region and locale (as discussed with DWR CASGEM staff). It would take some time for the City to identify partners, develop a regional monitoring program, and submit the data to the CASGEM program. If any further information is required from the City to comply with this issue please contact us immediately.

The City already monitors its groundwater wells on a regular basis and submits the information to the State of California. It seems unfair to deem the City's funding Application ineligible based on CASGEM compliance when the City is located in a region with an undeveloped CASGEM effort. The State has not yet explicitly provided the City with direction to comply with the CASGEM program to date.

In general, cities have not been a target for the initial implementation phases of the CASGEM program and therefore cities such as Newman should be given ample time, notification and direction for how they can comply with CASGEM within a reasonable period of time.

The City believes that DWR has the legal authority to determine the City's funding Application as CASGEM compliant for the purpose of this funding Application process given DWR's initial CASGEM implementation strategy and the City of Newman's location in a still unmonitored groundwater area.

As such, the City requests that DWR reconsider its Application and deem the project as eligible for funding and to re-rank the City's Application based on the content and merits of its Application. The City would enthusiastically work with DWR to develop a CASGEM compliance strategy when it is ready to work with cities like Newman.

Thank you in advance for your full consideration of the City's comments regarding its Application for this funding program.

If you have any questions or need further assistance, please contact me at 209-862-4448 or via kkim@cityofnewman.com.

Thank you,

Sincerely,



Koosun Kim, PE, QSD
Public Works Director, City of Newman

Cc: Michael E. Holland, City Manager, City of Newman