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Re: ACWA Comments on draft CASGEM Documents

To Whom It May Concern:

The Association of California Water Agencies (ACWA) appreciates the opportunity to comment on the draft California Statewide Groundwater Elevation Monitoring (CASGEM) Procedures for Monitoring Entity Reporting and Department of Water Resources (DWR) Groundwater Elevation Monitoring Guidelines. ACWA represents nearly 450 public water agencies in California that collectively supply over 90% of the water delivered in California for domestic, agricultural and industrial uses.

ACWA member agencies are dedicated to responsible stewardship of California's surface water and groundwater resources. ACWA believes that groundwater resources are best managed by local jurisdictions to effectively and efficiently sustain the state's groundwater basins. To that end, we appreciate DWR's efforts to ensure local entities active participation in the CASGEM program.

ACWA supports accountable and transparent groundwater management, which includes appropriate local monitoring, measurement and reporting of groundwater basin elevations to ensure groundwater basin objectives are being achieved. We have encouraged a feasible approach to the development of the CASGEM program since the passage of SBX7 6 in 2009, and will continue to collaborate with DWR as the process moves forward.

ACWA would like to offer the following specific comments on the proposed procedures and guidelines.

### Procedures for Monitoring Entity Reporting

#### Existing Groundwater Management Plans

- As DWR is aware, many agencies throughout the state have robust groundwater management plans that include monitoring for basin elevations that will satisfy the objectives of SBX7 6 (and subsequently the CASGEM program). ACWA believes DWR should expand on and reiterate the wording on page 4 that states “The CASGEM program will rely and build on the many, established local long-term groundwater monitoring and management programs.” Explaining to Monitoring Entities that many existing monitoring plans likely cover much, if not all of the components needed in the CASGEM monitoring plan would reduce confusion or questions and would be beneficial to both potential Monitoring Entities and DWR staff.

#### Roles and Responsibilities of Monitoring Entities, pg. 9

- The Procedures state that “DWR plans to continue monitoring groundwater levels [in their network], contingent upon available funding” but a local entity in those areas still needs to notify DWR of their intent to become the Monitoring Entity. While we appreciate DWR’s commitment to continuing their monitoring efforts, the requirement that Monitoring Entities must demonstrate “they have the capability to take over the DWR monitoring network” is inappropriate. This is not a requirement of SBX7 6 and cannot be placed upon the Monitoring Entity.

#### Data Gaps, pg. 14

- In this section, DWR details the variety of reasons that data gaps may occur in the CASGEM monitoring network “including a lack of suitable monitoring wells, lack of groundwater use, access issues, and jurisdictional issues, among others.” However, the next paragraph states that “if no local entity is able and/or willing to fill a data gap, [DWR] may be required to perform groundwater monitoring functions,” which could result in the agency and/or county in the area of the data gap being “potentially ineligible for a water grant or loan awarded or administered by the state.” This section must be clarified to emphasize that local entities will not be required to address certain data gaps within monitored basins, depending on the reasons for the lack of information or access. We would also like further clarification of grant and loan eligibility criteria for those counties or regions that include areas without significant overlying populations or uses. Finally, DWR is not allowed to require additional monitoring in areas lacking wells or sufficient density without funding support.

Well Information, pp. 17-18

- The required level of accuracy for monitoring well location (longitude, latitude, and elevation) in many cases is above and beyond the level of detail currently used by DWR and local monitoring agencies. This level of detail is not required to fulfill the requirements of the legislation, which is to determine seasonal and long-term trends in groundwater basins and subbasins. In many areas, the State Well number allows for general location down to the 40 acre level and this is sufficient for the intent detailed in the new sections of the Water Code. Should the longitude, latitude and elevation be required for each proposed monitoring well, volunteer monitoring entities would be subject to significant additional costs without measurable benefits to the CASGEM program. We recommend that DWR utilize the existing State Well ID system as it allows for sufficient detail in location and topographical maps would provide adequate elevation data.
- ACWA strongly believes that the confidentiality of Well Completion Reports (Reports) must be protected. While it is explained in the Procedures that the Reports will not be posted online, it also states that Reports voluntarily disclosed by a Monitoring Entity become records that DWR may be required to disclose in response to a request for public records (pg. 18). This is of much concern to many of our agencies, particularly those that work with multiple private well owners. This level of detail is not needed to accomplish the task of monitoring to determine seasonal and long term trends, and we do not think the submission of the Well Completion Reports should be recommended in this section. We would like to work with DWR to find a solution that will provide adequate basin elevation information while protecting the privacy of well owners throughout the state.

Groundwater Elevation Monitoring Guidelines

Guidelines for Measuring Water Levels

- On page 18 the guidelines recommend that, “as a general rule it is recommended that the measurements [for groundwater elevation] not be made until 24 hours after pumping has ceased.” This timeframe is impossible to attain for many agencies that might use irrigation wells as monitoring points. We understand DWR wants to ensure certain conditions exist to attain quality data, but ACWA believes consistent measurements are more important than a minimum time the well is off. While it is stated in the guidelines as a recommendation and not a requirement, ACWA believes it would be more appropriate to recommend measurements be taken on a consistent basis depending on the characteristics and use of the basin.
- On page 23 the guidelines outline a recommendation for making a measurement using the Electric Sounding Tape Method. In item (2), it states “place the tip or nail

of the index finger on the insulated wire at the RP and read the depth to water *to the nearest 0.01 foot (0.1 foot for production wells).*” While we appreciate DWR’s efforts to ensure a thorough set of data, ACWA believes that the requested level of accuracy is too finite given current practices and technology, would place an undue burden on local Monitoring Entities, and is not required to meet the objectives of SBX7 6. We also recommend that if there is a direct line-of-site to the tape and top of casing, it should be sufficient to take a direct reading from the tape rather than using the ‘tip or nail of the index finger’ technique described.

#### Points of consistency and clarification

ACWA also noted sections of the document we believe would benefit from additional clarification or a review for consistency throughout the guidelines.

#### *Procedures for Monitoring Entity Reporting*

- The phrase, “establishing Monitoring Entities for each Bulletin 118 basin” (pg. 6) might be misinterpreted as meaning one entity is responsible for an entire basin. While this language is spelled out later in the document, we believe further clarification is needed at the beginning of the Procedures and recommend revising the phrase to, “identifying Monitoring Entities that provide coverage for each Bulletin 118 basin.”
- The Procedures for Monitoring Entity Reporting should further clarify that only Monitoring Entities need to submit an application, compile data and submit the information to DWR. (pg. 8). Cooperating Agencies and other agencies within the basin (cities, counties, local water agencies not involved in monitoring) do not have to provide information directly to DWR.
- In order to serve as the Monitoring Entity, agencies are required to submit a “copy of the current groundwater management plan.” Because there is often more than one plan covering basins or subbasins, references to this requirement should be edited to read “. . . groundwater management plan or plans.” (pp. 9-13)
- Throughout the Procedures DWR refers to “seasonal” when referring to data collection, as is outlined in the statute. These references should clarify that “seasonal” means at least two times per year, but no more. The Guidelines explain the measurements as “semiannual” (pg. 11), which more appropriately describes the required frequency.
- The Procedures indicate submission of the State Well Number is required when providing information on the monitoring sites and timing and reporting a

groundwater level data measurement (pp. 15, 17), but then identify this as a “recommended” data point on page 18. This inconsistency needs to be addressed.

- The Procedures do not address how Monitoring Entities should monitor and report basins with multiple aquifers. It is important to provide additional details for those Entities that may be reporting this type of groundwater level information.

General organizational comment

- ACWA believes the document’s overall organization would be more consistent and effective if DWR promoted the Data Reporting section header on page 16 to the same level as the Monitoring Plans header seen on page 14. The monitoring plan is one deliverable, and the data reporting is a subsequent, recurring deliverable. Similarly, it will prevent confusion if the detailed list of data that should comprise monitoring plans (Entity Information and Well Information, beginning on page 17) is listed under Monitoring Plans section; and the detailed list of data regarding Groundwater Elevation Information (page 19) is listed under Data Reporting section.

Thank you for the opportunity to comment on the draft procedures and guidelines. We look forward to working with you to fully implement the CASGEM program.

Sincerely,



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