



# San Diego County Water Authority

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**Mary Scruggs**  
Supervising Engineering Geologist  
Department of Water Resources  
1416 9<sup>th</sup> Street, P.O. Box 942836  
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**MEMBER AGENCIES**

- Carlsbad Municipal Water District
- City of Del Mar
- City of Escondido
- City of National City
- City of Oceanside
- City of Poway
- City of San Diego
- Fallbrook Public Utility District
- Helix Water District
- Lakeside Water District
- Olivenhain Municipal Water District
- Otay Water District
- Padre Dam Municipal Water District
- Camp Pendleton Marine Corps Base
- Rainbow Municipal Water District
- Ramona Municipal Water District
- Rincon del Diablo Municipal Water District
- San Dieguito Water District
- Santa Fe Irrigation District
- South Bay Irrigation District
- Vallecitos Water District
- Valley Center Municipal Water District
- Vista Irrigation District
- Yuima Municipal Water District

On behalf of our member agencies, the San Diego County Water Authority would like to provide comments on the Department of Water Resources Groundwater Elevation Monitoring (CASGEM) Program Procedures for Monitoring Entity Reporting. The Water Authority is a wholesale water agency with twenty four member agencies. While we do not have any of our own groundwater supplies, a number of our member agencies use groundwater within San Diego County. On November 16, 2010 we met with our member agencies to receive input on how they might consider participating in this monitoring effort. We found that while several of the agencies operate both production and monitoring wells in a number of the identified Bulletin 118 groundwater basins, there are few that would qualify as "monitoring entities" under the statute and proposed guidelines. We expect that DWR will find this to be a fairly common issue in other parts of the state as well, particularly in areas that have numerous, smaller groundwater basins.

Although our member agencies cannot, under the statute, declare themselves to be a "monitoring entity," several are willing to work cooperatively with DWR to provide groundwater monitoring data from the wells they operate or use for data collection. We request that the guidelines include a definition of "cooperating entity" which allows agencies that are not "monitoring entities," to report data directly to DWR through your data entry system. In addition, the guidelines should describe how an agency can become a "cooperating entity" and state that volunteering as a cooperating entity does not create an ongoing duty to monitor and report data. DWR may also want to consider allowing a single agency to be considered a "voluntary cooperative monitoring association" so that a single retail agency may volunteer to be a "monitoring entity" without being required to adopt a groundwater management plan.

Thank you for the opportunity to comment. If you have any questions regarding this letter, please contact Dan Diehr (858) 522-6748 at or me at (858) 522-6743.

Sincerely,

**Toby J. Roy, P.E.**  
Water Resources Manager

**OTHER REPRESENTATIVE**

County of San Diego

*A public agency providing a safe and reliable water supply to the San Diego region*