



2171 E. Francisco Blvd., Suite K • San Rafael, California 94901
Phone: (415) 457-0701 • FAX: (415) 457-1638 • email: sr@stetsonengineers.com

Covina and Bakersfield, California • Mesa, Arizona • Centenni



August 10, 2011

by email

Charles R. Hoppin, Chairman
State Water Resources Control Board
1001 I Street
Sacramento, California 95814

Re: Comment Letter – Water Measurement

Dear Mr. Hoppin:

On behalf of Stetson Engineers, I attended the Water Diversion Measurement Workshop, held by the State Water Resources Control Board (SWRCB) in Sacramento on July 21, 2011. Stetson Engineers provides water rights consultation to large and small water users throughout California, including technical assistance with water diversion and measurement practices and the SWRCB's reporting requirements. Several California water agencies, associations, and interested parties were present at the July 21 Workshop, and raised some good questions pertaining to the State's larger water users. At this time, we have a few questions (requests for clarification) that perhaps pertain more directly to the measurement and reporting requirements of smaller water users:

- 1) Please clarify how the measurement of water diversions, required by January 1, 2012, relate to the requirement that water users report the "maximum rate of diversion for each month," as requested in the SWRCB's *Report of Licensee, Progress Report by Permittee, and Supplemental Statements of Water Diversion and Use*. Measuring and recording maximum rates of diversion would require the installation of continuous recording equipment. For small (and large) water users, the purchase, installation, and maintenance of continuous recording devices for the purpose of measuring and recording maximum diversion rates would be very costly. It would be helpful if the SWRCB could clarify the water measurement requirements for reporting maximum rates of diversion, and perhaps offer some reasonable alternatives, such as allowing the water user to estimate the maximum rate of diversion based on the estimated capacity of the diversion facility (e.g., maximum pump capacity).

- 2) The requirement that diversions be measured suggests the need for even small water users to purchase and install water meters. However, in some cases, the measurement of small water diversions would be more cost effective and more accurate using volumetric methodologies. It would be helpful if the SWRCB could clarify the water measurement requirements for small water users and perhaps offer some reasonable alternatives to water meters that the SWRCB would be willing to accept, such as volumetric methods of measuring water.
- 3) The requirements for measurement of water diversions allow water users to "...provide the board documentation demonstrating that the implementation of those practices [best technologies and practices for water measurement] is not locally cost effective." Please clarify what type of documentation the SWRCB would consider acceptable for demonstrating that the implementation of the best technologies and practices for water measurement are not locally cost effective, and provide details as to how and when the water user should provide that documentation to the SWRCB

Thank you for considering Stetson's questions and requests for clarification, we look forward to your responses.

Sincerely,



Julian Fulwiler
Stetson Engineers

cc: Allan Richards, Stetson Engineers