

commentletters



From: Ferguson, Bill <BFerguson@SantaBarbaraCA.gov>
Sent: Wednesday, December 16, 2015 8:17 PM
To: commentletters
Cc: Haggmark, Joshua N.; Dyer, Kelley A.
Subject: Comment Letter - Emergency Regulation for Measuring and Reporting the Diversion of Water

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board,

Thank you for the opportunity to comment on the subject draft regulations. We request that the Board consider the following as the regulations are finalized:

1. As noted in our previous comments, our diversions are in remote locations and are typically set at a fixed flow rate for periods of days or weeks at a time, but monitored and read daily. Hourly visits to the site would yield little information of value, but would consume a large portion of the available staff resources. The regulations should provide an exception from the requirement for hourly observations or recordings for such situations, subject to a requirement that the diversion totals be calculated for daily intervals in a manner that reflects any adjustments in diversion rates made during the 24-hour period.
2. It is not clear that the proposed regulations would consider manual recording of a flow rate, followed by entry into an electronic spreadsheet for submittal to the Board, to be a suitable means of complying with the measurement requirement, in lieu of an automated recording device. We request that the regulations acknowledge that this approach is adequate.

Please feel free to contact us if you have questions.

Thank you.

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