



City of Santa Barbara

Public Works Department



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August 9, 2011

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Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Comment Letter – Water Measurement

Dear Ms. Townsend:

We appreciated the ability to log onto the July 21, 2011 State Water Resources Control Board hearing on new requirements related to diversion measurement.

Following are our comments for the Board's consideration:

1. Monitoring of a diversion by the U.S. Geological Survey (USGS) should be sufficient evidence that measurements are compliant with "best available technologies" and "best professional practices." USGS is widely acknowledged for their expertise, objectivity, and commitment to data quality.
2. We would like to reinforce the point made at the hearing that adequate time should be allowed for compliance once the key terms and standards have been defined.
3. We encourage the Board to allow a less stringent standard of accuracy for smaller diversions, perhaps those not exceeding 5 cubic feet per second. This relates to the cost effectiveness of measurement technology, since the value of more accurate measurement diminishes as the amount of diversion becomes smaller.

We were pleased to hear the Board's commitment to cost effectiveness in the implementation of the new standards and we thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Theresa Janney".

Rebecca Bjork *FOR*
Water Resources Manager

BF/dm

cc: Cathy Taylor, Water System Manager
Jon Peebles, Water Distribution Superintendent
Bill Ferguson, Water Resources Supervisor