

November 18, 2011

Technical Memorandum

To: Mr. Steve Heringer, Chair Board of Directors, Reclamation District 999  
Re: SWRCB Water Diversion Measurement Requirements

BSK Associates (BSK) is pleased to provide consulting services regarding the assessment of California State Water Resources Control Board's (SWRCB) Guidance for Complying with Water Diversion Measurement Requirements for Statement Holders (Guidance) and the revised 2012 Supplemental Statement form (Statement).

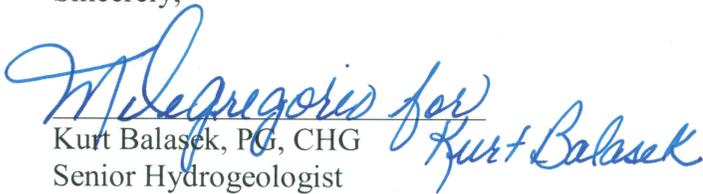
The Guidance and the associated web-site postings provide thorough and detailed descriptions of measurement approaches and technologies, as well as a useful FAQ. After a detailed review of the draft Statement form, it appears that significant and positive changes have been made to the form for clarity. The Statement now includes several appropriate diversion measurement techniques for the types of intakes typically used in the Delta. The modifications proposed for the Statement provided herein are of a minor nature and intended to clarify likely areas of confusion for applicants. The inclusion of these additional categories in the Statement would provide additional clarity for the completion of the form, and could reduce the manual review of the forms by SWRCB staff. Proposed revisions:

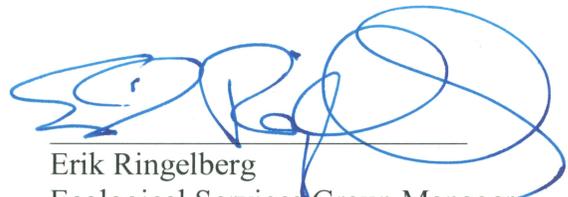
Section 1. b. Add, "Property owner/lessee following manufacturer's recommendations."  
Section 3. e. Add, "Diversion is mobile (such as siphons)." and "No power at diversion."  
Section 3. f. Add, "Fuel use (for PTO or Diesel pump)." and "Hour meter (for PTO or Diesel pump)."  
and "Float and stopwatch."

As has been previously discussed and noted in our prior reports, there are unique complexities associated with water measurement in the Delta due to both hydraulic conditions and the methods of water diversion and distribution used. In the longer term, remote satellite imaging of broader geographic areas may provide more cost effective, and useful data to the SWRCB than individual reporting. To this end, BSK will continue work in coordination with SWRCB staff and Delta stakeholders regarding the potential for use of this and other available technologies.

Please do not hesitate to contact the undersigned if you have any further questions or comments.

Sincerely,

  
Kurt Balasek, PG, CHG  
Senior Hydrogeologist  
Sacramento Office Manager

  
Erik Ringelberg  
Ecological Services Group Manager