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November 17, 2011

Mr. Rich Satkowski
State Water Resources Control Board
Division of Water Rights
P.O. Box 2000
Sacramento, CA 95812-2000
Transmitted via email to rsatkowski@waterboards.ca.gov

Re: Comment Letter – Water Measurement

Dear Mr. Satkowski:

This is to provide comments on the Division's water diversion measurement guidance and the proposed new section of the Supplemental Statement of Water Diversion and Use reporting form. We offer the following comments for your consideration:

Proposed New Sections of the Supplemental Statement of Water Diversion and Use Reporting Form

- Item 1a.: This section should include the use of 'staff gage and storage capacity curve' as a type of measuring device. The use of a staff gage with a corresponding capacity curve should not be considered an 'alternate' measuring method. The Division's own staff utilizes readings from a staff gage and a corresponding capacity curve to determine the amount of water that has been diverted to storage and withdrawn from storage for purposes of licensing a reservoir project. This has been an acceptable method for determining water diversion and use for more than 50 years. The data generated from the use of staff gages in reservoirs for this purpose is no more fallible than a meter, totalizer, sluice gate or weir. They all require maintenance and diligence to obtain accurate information.
- Item 1b.: We suggest that a check-box be added for "unknown". In some cases measuring devices were installed by previous owners and the current owners have no information on the original installer.
- Item 1c.: We suggest that "if available" be added to this question. Again, many of these devices were installed by previous owners and the current owners have no information on the make/model/serial numbers.

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Item 1f.: “Staff gage and storage capacity curve” should be removed from this section and included in 1a. as discussed herein.

Items 1e., 1f., 1g. and 1h.:

Will the text boxes allow room for an adequate amount of text, or will we be able to include attachments? We recommend that both methods be allowed.

We appreciate the opportunity to provide comments on this matter. We would be happy to participate in a meeting with your staff to discuss these comments and to work jointly on how best to provide the information required in Water Code Section 5103.

Very truly yours,

WAGNER & BONSIGNORE
CONSULTING CIVIL ENGINEERS



Paula J. Whealen, Principal