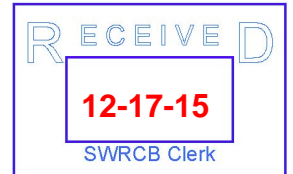


commentletters



From: Wells, Paul@Waterboards
Sent: Thursday, December 17, 2015 1:20 PM
To: commentletters
Subject: FW: Draft Emergency Regulations for Measuring and Reporting on the Diversion of Water

From: Charleen Beard [<mailto:cbeard@co.shasta.ca.us>]
Sent: Thursday, December 17, 2015 11:56 AM
To: Wells, Paul@Waterboards
Cc: Eric Wedemeyer
Subject: Draft Emergency Regulations for Measuring and Reporting on the Diversion of Water

Hi Paul,

Thank you for this opportunity to comment on the subject regulation.

Comments on the Proposed Emergency Regulation for Measuring and Reporting
December 7, 2015 Agency Draft for Public Comment

1. Section 933(b)(1) Data Recording. Currently our meters do not record the date, time, or volume of water diverted. Our technicians or Operators read the meter, and record that information on a paper sheet, which is translated into Xcel monthly. Would that comply with the requirements of this section? If not, where is the funding for upgrading the measuring device and reporting system going to come from?
2. Section 933(b)(1)(A) options i, ii, and iii all include the language "or more frequent." Please include a cap on this. Shasta County manages 6 small water CSAs. We could comply with a weekly or daily reporting requirement if necessary, but we do not have the staffing to do hourly reporting, and hiring additional staff in order to comply with an hourly requirement would constitute a financial hardship.
3. As a municipal water supplier, our meters are used to determine chlorine dosing requirements for public consumption. If our meters are accurate enough to determine dosing for public consumption, why do we need to do additional accuracy testing to comply with the 5 year accuracy requirements?

Thank you,

Charleen Beard
Associate Engineer
Shasta County Department of Public Works
1855 Placer Street
Redding, CA 96001
Office: 530-245-6806