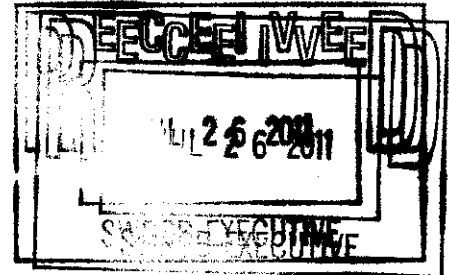


July 25, 2011

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



Re: Oakdale Irrigation District – Water Diversion Measurement

Dear SWRCB Members:

Oakdale Irrigation District (OID) appreciates the chance to comment on the above noted project and further appreciates the opportunity to have been part of the July 21, 2011 workshop in Sacramento concerning Water Diversion Measurement. Through both testimony given at the workshop and previously written comments received, it is apparent that there is significant work ahead of both Board and Staff. Having been involved as both an Agricultural Stakeholder and a member of the A2 Subcommittee for the DRAFT Agricultural Measurement Regulation, OID sees the road ahead as being anything but smooth. With that in mind, it seems imperative during the infancy of this project, that the Board clearly understand that any newly created policy must be viable, efficient, practical, economically feasible, and most importantly implementable.

At OID, the gages monitoring our water diversions from the Stanislaus River have been in active existence for nearly one-hundred (100) years (records back to 1914) and under U.S. Geological Survey (USGS) scrutiny and verification. Current measurement methodology follows that published by the UUSGS entitled, *Techniques of Water Resources Investigations (TWRI)*. While it was noted by State Board Staff at the July 21, 2011 workshop that this project is intended to target the "small" diverters, OID finds no evidence in either the statute or any of the supporting documentation to validate that statement. If in fact water diversion measurement for the "small" diverters is the intent, this should be explicitly clear in any resulting regulation (similar to that applicability section of the Agricultural Measurement Regulation). If that is not the intent, we recommend that the State Board consider inclusion of those measurement methodologies currently in existence and as noted above.

While the costs for water diversion measurement is shared by our sister district, South San Joaquin Irrigation District (SSJID), our combined annual costs are in excess of \$100,000 and our measurement accuracy is considered to be between good (within 5%) and excellent (within 2%). At this juncture, the State Board seems uniquely positioned given that there is no legal

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requirement that new regulation be drafted. The ability for the State Board to provide non-binding guidance seems prudent in an effort to not overly burden those legal diverters of water within the State of California (State) while actively working to control, prevent, and address current illegal diverters within the State. Furthermore, the issuance of non-binding guidance would provide time for State Board Staff to work with Legislators, the Department of Water Resources, U.S. Bureau of Reclamation, Stakeholders, etc. in the hopes of creating regulation which will provide standardized and meaningful water management tools.

Should you have any additional questions, please feel free to contact me at (209) 840-5508.

Sincerely,

OAKDALE IRRIGATION DISTRICT



Steve Knell, P.E.
General Manager

SK;lfp

cc: Administration Files
Board of Directors (5)
Tim O'Laughlin, Water Counsel