



**City of Pittsburg
Water Utilities Department
65 Civic Ave.
Pittsburg, California 94565**

May 9, 2014

Via E-mail

Mr. Keith Wallace
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
P.O. Box 942836
Sacramento, CA 94236

Keith.Wallace@water.ca.gov

RE: Comment Letter - Draft 2014 IRWM Drought Grant Program Guidelines and Proposal Solicitation Package (PSP)

Dear Mr. Wallace:

From information provided dated 12/30/2013, the Pittsburg Plain Groundwater Basin has been categorized as a Very Low Ranking Range Groundwater Basin. The draft Proposal Solicitation Package (PSP) and Guidelines released in April 2014 state that California Statewide Groundwater Elevation Monitoring (CASGEM) compliance is required for high and medium priority groundwater basins in order to be eligible for drought grant funding.

The City of Pittsburg started our groundwater monitoring program in 2005, in advance of any requirement from the State of California. A group of agencies in the East Bay Region of the San Francisco Bay Area recently held a conference call meeting with staff of the California Department of Water Resources to discuss the CASGEM compliance requirement proposed in the draft PSP and draft Guidelines for the 2014 Integrated Regional Water Management (IRWM) Drought Solicitation Implementation Grant Program funded by Proposition 84. From my interpretation of the PSP, we will not be eligible for Prop 84 funding if areas in our IRWM, but outside of our control, have not started their CASGEM compliance. Much of this area does NOT have a water utility and may not have significant groundwater use.

As a municipal government and a disadvantaged community, the City of Pittsburg has neither the legal authority nor the financial ability to take responsibility for the failure of other individuals or agencies to handle their groundwater basin monitoring. Please narrow the requirements to those that are specifically in the California Water Code section 10927. The CASGEM Compliance included in the PSP seems to have expanded the requirements past what is included in the Water Code.

The East County IRWM group has a number of good drought relief projects that are ready to proceed and can immediately respond to the drought, but which may not move forward without grant funding assistance.

Sincerely,

Walter C. Pease
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