

MONTEREY PENINSULA WATER MANAGEMENT DISTRICT

WATER DISTRIBUTION SYSTEM MEMORANDUM

Date: November 28, 2007

To: MPWMD Staff and Interested Parties

From: David A. Berger, General Manager 

RE: WATER DISTRIBUTION SYSTEM MEMORANDUM #4 – CONSIDERATION OF REQUESTS FOR WELL PUMPING TESTS BETWEEN DECEMBER 1 AND MAY 31 IN EXTENDED DRY WEATHER SCENARIOS

The current Implementation Guidelines for the Monterey Peninsula Water Management District (MPWMD or District) Rules and Regulations governing Water Distribution Systems (WDS) provide guidance on the period of time that well pumping tests will be accepted by the District (June 1 through November 30). Specifically, page 3 of the *Procedures for the Well Source and Pumping Impact Assessments* (“Assessment,” revised May 2006) states:

Timing of Tests. Pumping tests shall be conducted during the dry period of the year to better assess well performance under reduced groundwater availability conditions. Accordingly, the period for conducting pumping tests is the six-month period from June 1 through November 30.¹ This period shall apply to all pumping tests required for an Assessment unless the District determines a specific alternate testing period, which may be based upon the occurrence of unusually wet hydrologic conditions within the dry season. Given that hydrologic conditions vary from year to year, scheduling of pumping tests outside the dry season shall be guided by Carmel River flows, as a relative measure of dry season conditions.² Accordingly, pumping tests outside the dry season shall only be conducted during “Low Flow Periods,” defined as “times when stream flow in the Carmel River at the Don Juan Bridge (river mile 10.8) gaging station is less than 20 cubic feet per second (cfs) for five consecutive days”. Applicants or consultants wishing to conduct pumping tests outside the six-month dry season must obtain authorization in advance from the MPWMD.

As we enter a potentially second dry year, questions have been received about the protocol to request MPWMD acceptance of well pumping test results performed after November 30 in addition to requests for clarification of certain sentences in the above paragraph. This

¹ Carmel River flows are used as a guide for local hydrologic conditions throughout the District for the timing of pumping tests; the June 1 through November 30 period corresponds to the six lowest months of Carmel River flows, on average.

² The criterion for determining “Low Flow Periods” is from an agreement (referred to as the “Conservation Agreement”) entered into between the National Marine Fisheries Service and California American Water in 2001. Elements of this Agreement were later adopted as part of State Water Resources Control Board Order 2002-0002. In the Agreement and Order, specific operational restrictions are linked to Low Flow Periods, defined as “times when stream flow in the Carmel River at the Don Juan Bridge (RM 10.8) gage is less than 20 cfs for five consecutive days”.

memorandum serves as written guidance on these subjects. Notably, *this memo supersedes the Assessment text noted above.*

Advance Authorization from MPWMD: A signed written request, with a site location, Assessor's Parcel Number, contact person and mailing address, requested testing dates and other relevant information must be submitted to request a variation from the protocol described above. A scanned "pdf" of a signed original document is acceptable. Telephone calls or e-mails are not considered to be a formal request, though they are acceptable means of informal communication. District staff may provide an interim written response via e-mail as a courtesy to the applicant, but shall provide a signed, written response on District letterhead to authorize a test. Only the signed, written response on District letterhead is considered to be the official authorization for a test to be conducted for a specific well during a specific period. Staff may send the approval via facsimile or as a scanned "pdf" e-mail attachment.

Testing Performed After November 30: Pumping tests shall be accepted after November 30 in compliance with WDS permitting requirements if such tests are initiated prior to the first full day that mean daily flow of the Carmel River exceeds 20 cfs at the Don Juan Bridge streamflow gaging station operated by MPWMD. Once the Carmel River flow at the Don Juan Bridge exceeds a mean daily flow of 20 cfs, pumping tests shall not be accepted until after June 1, even if the river flow rate subsequently drops below 20 cfs.

Testing Performed Before June 1 in a Drought Scenario: As noted above, testing shall not be accepted before June 1 once mean daily river flow exceeds 20 cfs at the Don Juan Bridge after November 30. The first day of the test shall not occur before June 1. If a prolonged, severe drought occurs, this policy may be reconsidered and a separate memorandum prepared.

Coordination with Monterey County Health Department (MCHD): District and Health Department staff members coordinate to minimize conflicting direction to applicants as much as possible, but some differences exist. As of November 2007, MCHD is preparing written revisions to their well testing policy, but these revisions have not been finalized. In the meantime, the District's understanding is that MCHD will witness well pumping tests after June 1 until the "first significant rainfall," presently informally defined as 3-to-5 inches, when the ground becomes saturated. MCHD managers have advised District staff that MCHD is aware of the District's November 30 cut-off date, and would not schedule any well testing observation after this date within the MPWMD boundary without the District's written authorization as described above. This District memorandum will be revised once the MCHD's written policy is received.