



Ventura County Coalition of  
Labor, Agriculture and Business

P.O. Box 4237, Ventura, CA 93007

Email: [execdirector@colabvc.org](mailto:execdirector@colabvc.org)

[www.colabvc.org](http://www.colabvc.org)

December 9, 2014

Ventura County Board of Supervisors  
800 S. Victoria Avenue,  
Ventura, CA 93009  
Transmitted via email to Brian Palmer

**RE: Comments on Water Well Flowmeter Calibration Policies and Procedures – Item 30, Exhibit 1**

The Ventura County Coalition of Labor, Agriculture and Business (VC CoLAB) has the following comments with respect to flowmeter calibration policy as posted on the County website. This letter is on behalf of several members who are concerned about the language and requirements in the document. While we recognize the importance of collecting accurate flow data, we believe the current language is confusing:

*Section A - General Procedures: "All required groundwater extraction flowmeters shall be tested for accuracy every three years to demonstrate accuracy within a range of plus or minus 5%." However, in the water well ordinance, groundwater extraction flowmeters are not required for de minimus extractors, defined as; "A person who extracts, for domestic purposes, two acre-feet or less per year". How does this language apply to domestic wells that serve several houses or parcels where each owner uses 2 acre-feet or less?*

*"After the initial calibration, a waiver may be granted to this requirement to those well owners whose well has a pump motor of less than or equal to 10 horsepower and that extract less than or equal to 2 acre-ft of groundwater, averaged over a period of five years." This seems to be an additional requirement for the well to have a pump motor of 10 horsepower or less which is not a requirement of a de minimus extractor in the ordinance. In addition, the language is confusing – it should be "less than or equal to 2 acre-feet of groundwater per year, averaged over a period of five years."*

*"In addition, after a five-year period has expired from initial calibration, the well owner can apply for an additional five-year waiver. In no case shall the flowmeter be calibrated less than every 10 years". This is confusing as well. Which well owner would need a waiver? De minimus well owners did not need a flowmeter in the first place as described in the water well ordinance.*

*Section C - Testing Option Via Southern California Edison (SCE): If the well pump motor is tested for electrical demand efficiency by Southern California Edison (SCE), a copy of the SCE Efficiency Report may*

*be submitted to the County in-lieu of the required flowmeter calibration report; however, an adequate comparison of the SCE-determined flow measurement against the customer's existing well flowmeter must be provided within the submitted report.* Our members see two problems with this. First, there is no method to correlate Edison measurements with flowmeter readings. Second, Edison cannot keep up with the demand for calibrations now, so how will they deliver reasonable service times after the new 3 year calibrations are required for all new wells.

Our recommendation is that the calibration requirements be simplified and be required for wells in high and medium priority basins only as designated by the State. Further we recommend changing the requirements such that users between 2 and 100 acre-feet per year calibrate every 5 years and users over 100 acre-feet per year calibrate every 3 years.

We do not see any reason to rush this Exhibit 1 to the ordinance with such conflicting language and believe another revision pass is advisable before adoption.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynn Gray Jensen".

Lynn Gray Jensen  
Executive Director

Cc:

Tully Clifford via email

Gerhardt Hubner via email

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