



November 22, 2010

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Regional Planning Branch
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RE: CASGEM Program Comments

The Sonoma County Water Agency (Water Agency) appreciates the opportunity to comment on the *Draft Procedures for Monitoring Entity Reporting, California Statewide Groundwater Elevation Monitoring (CASGEM) Program*, dated October 2010. The Water Agency would like to offer the following comments for your consideration in finalizing the document:

Page 9: The Procedures state that Monitoring Entities "must show that they have the capability to take over the DWR monitoring network." This is not a requirement of SBx7 6 and should not be placed upon the voluntary Monitoring Entities.

Page 13: It is stated that the online notification system will be available by fall 2010. According to the November 1, 2010 letter from Paula Landis, this online notification system will not be accessible until mid-December 2010.

Page 14: The discussion on Data Gaps should be clarified. DWR is directed by statute to address unmonitored basins and sub basins. However, DWR is also not authorized to require additional monitoring in areas lacking wells or sufficient density without funding support.

Page 15: The exclusion of public water supply wells from the CASGEM program could significantly limit the ability to develop adequate groundwater level monitoring networks in many basins and sub basins where there are few other wells. It would also be helpful to provide the definition of the public supply wells that would be excluded from the program in the Procedures document.

Page 15: For the purposes of assisting Monitoring Entities and cooperating agencies with outreach efforts to establish monitoring well networks, it would be helpful if the Procedures stated that the physical address of the wells volunteered into the CASGEM program will not be made publically available. Additionally, the Procedures should make it clear that neither the Monitoring Entity nor DWR shall have the authority to: (1) enter private property without

consent of the property owner; or (2) require a private property owner to submit groundwater monitoring information to the Monitoring Entity or DWR (SB6 10934[a]).

Page 16: Requiring a well to be offline for 24-hours prior to obtaining static water level measurements will be difficult to achieve for many wells and likely reduce participation in the CASGEM program. Rather than setting this arbitrary 24-hour timeframe, the Procedures should stress the need for Monitoring Entities to develop the appropriate procedure on a well-by-well basis and the need for this procedure to be consistent for each monitoring event.

Page 18: The degree of acceptable accuracy for horizontal and vertical coordinates should be identified in this document (i.e., it should be clear that on the ground surveying is not a requirement, as described in the Guidelines document).

Page 18: An Optional field for "Aquifer Name (where known)" should be included.

Should you have any questions regarding these comments please contact Marcus Trotta at 707.547.1978 or marcus.trotta@scwa.ca.gov or Jay Jasperse at 707.547.1959 or jay@scwa.ca.gov.

Sincerely,



Marcus Trotta
Hydrogeologist



Jay Jasperse
Chief Engineer