



COUNTY OF SONOMA PERMIT AND RESOURCE MANAGEMENT DEPARTMENT

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Sonoma County Permit and Resource Management Department Comments on Draft CASGEM Procedures for Monitoring Entity Reporting

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- 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 14: Data Gaps need to be discussed in more detail. Sonoma County has vast areas where few to no wells exist. How will DWR assist Monitoring Entities in establishing ground water elevations in these areas? Will funding be provided?
- Page 15: If public water wells can not be used for ground water elevations the monitoring agency will be significantly limited in development of a network of ground water elevation wells.
- Page 15: Requiring a volunteers' private water well to be off line for 24 hours is not realistic and will deter people from participating in the program. Suggest a much lesser time frame.
- Page 15,18: The requirement of NAVD88 for vertical datum and NAD83 horizontal datum suggest an on-ground survey would be required for well coordinates. Flexibility for determining well coordinates should be left to the monitoring entity. The use of USGS topo maps and GPS should be specifically allowed in the procedures document. Suggest eliminate NAVD88 and NAD83 as a mandatory requirement in the procedures.
- Page 16: Volunteers participating in the program should have their addresses protected as confidential information and not released to the general public.

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