Date Received	Commentor	Comment	Responses to Comments
		Page 20 line 808: Improved understanding **OF** recharge and discharge mechanisms within the Subbasin for both the shallow and deep aquifer systems will support the appropriate selection of projects and actions needed for the Subbasin. ● Gaining an improved understanding of the interconnection of streams to the shallow aquifer system, including seasonal variability and how groundwater pumping can affect streamflow. Additional shallow monitoring wells near stream courses paired with stream gages and meteorological stations can help advance this understanding. ● Conducting geochemical or tracer studies, which can help better understand both recharge and discharge mechanisms to both the shallow and deep aquifer systems, as well as surface water/groundwater interaction within the Subbasin	Comment incorporated.
		Page 21 line 873: The yearly **averaged** precipitation measured from this station from water years 1903 through water year 2018 is 29.3 inches, compared with 33.3 inches, as calculated by the PRISM model, as shown indicated in Appendix 3-A.	Comment noted.
		Page 22 line 894: Historical groundwater-level contour maps (Figure 3-9a-b) – **missing**	Comment noted - to be provided in subsequent draft for AC review.
		Page 23 line 931: From the south end of the valley, groundwater flows northwesterly from the Mendocino Range toward the Laguna de Santa Rosa.	Comment incorporated.
		Page 25 line 1019: Six active or emergency/standby municipal production wells (five of these are completed within the shallow aquifer system and one is completed within the shallow aquifer system);	Comment incorporated.
		All these wells are over 200 feet deep with the exception of the Peter Springs Well which is 160 feet deep	Comment incorporated.
		Page 38 line 1580: 3.2.6.3 Groundwater Dependent Ecosystems SGMA defines an undesirable result as "depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water." To help characterize environmental beneficial users, it is necessary to identify the aquatic species and habitats that could be adversely affected by lowered groundwater levels in principal aquifers and interconnected surface water depletion. The GSA partnered with the **Santa Rosa Plain and Petaluma Valley GSAs** to form a practitioners' work group to provide expert advice and perspectives,	Comment noted.
		In Sonoma Valley, a total of 19 streams were identified as habitat for at least one target species. Steelhead was the most widespread species occurring in each of the 19 streams. The distribution of Chinook salmon, coho salmon, and California freshwater shrimp overlap entirely with steelhead streams. For this reason, steelhead are essentially used as a priority indicator species to cover all aquatic GDEs in the Subbasin.	Comment incorporated - text revised.
		COMMENTS BELOW REGARDING APPENDIX WB 3-A: Updating the Santa Rosa Plain Hydrologic Model for Use in Development of the Groundwater Sustainability Plan for the Santa Rosa Plain Groundwater Subbasin pp 52	All comments below noted and staff communicated directly with Mr. Anderson.

Date Received	Commentor	Comment	Responses to Comments
		Overall, I find the document would benefit from some additional background / introductory guidance. The reader (DWR) most cares about the Bulletin 118 area. The model has a history from USGS. It also has been revised. And, the data shown for the Subbasin has been mostly extracted from the larger whole. But, at day's end, it is the Subbasin that matters. Best to focus on that alone and pare down the rest. Would be good to have a special place for listing of key data points. Such as from 1.2.1.2: A total of 11,943 parcels are included within the entire model domain and 7,482 parcels are within the Subbasin, of which 1,282 wells are urban users in the Subbasin (Table 1). Though again, it is the Subbasin that matters. P. 12 from WORKING DRAFT Water Budget – reference differ between documents: The water budget is computed using the revised SRPHM, which simulates the time period from October 1974 to December 2018 encompassing the period of best available science and information for the Subbasin. Then on P. 9, revised SRPHM 1.0+ is several times lower than estimates from the original SRPHM. P. 4: this is first and only mention of two aquifers: In accordance with Section 354.18 of the GSP Regulations, one integrated groundwater budget was developed for the combined inflows and outflows for the two principal aquifers for each water budget period. P. 11: be good to cite to a place in document for # amount of recycled water: Recycled water is indirectly incorporated through the external link file that acts to apply the recycled water directly into the soil zone. This water should act to limit groundwater pumping where it is applied by satisfying the potential evapotranspiration before irrigation is required. P. 11: different years? The datasets included the crop land use datasets for 1974, 1986, 1999 and 2008. Newly available land use datasets from DWR for 2012, 2014 and 2016 were used to update the agricultural land use to 2018. On page 15: These years are 1976, 1979, 1986,1999, 2008, 2012, 2014 and 2016 P. 11: in the text, which is 'the above list?' and only cells in the above list are included	

Date Received	Commentor	Comment	Responses to Comments
		p. 12: be good to flag this issue of pasture acreage/ water source for “future work needed”. Pastures are prevalent within the Subbasin and can can be a water intensive crop. In the 2019 Rate Study (Raftelis, 2019) it was assumed that pastures in the subbasin were not irrigated, whereas the 2012 DWR land use map by DWR indicates an irrigated land use for pasture areas. In order to assess whether pastures are irrigated, we mapped irrigated pastures identified in DWR’s land use dataset with the remote sensing-based normalized difference vegetation index (NDVI). NDVI is a common tool to assess vegetation health (Anderson et al, 2012), with values ranging from -1 to 1. Greater NDVI values indicate the increasing presence of chlorophyll content in plant matter, and thus a healthier non-stressed crop which is interpreted to be an indicator of irrigated agriculture. Figure 5 shows the irrigated pasture locations from DWR 2012 as input into the groundwater model with the 2012 Fall NDVI average values. The pastures identified in the model occur in areas with high NDVI values indicating vigorous growth late in the season, and therefore a high likelihood that these pastures are irrigated. // For water year 2012, 74% of the simulated pasture model cells in the subbasin received recycled water. // The pasture land use crop inputs derived from the DRAFT 2012 dataset were applied for the 1986 to 2018 period because of the reliance on data only available within the 2012 dataset P. 11-12: in one place 2012 Pasture acreage is 3,420 – in another 2012 Pasture acreage is 890: Table 2 Comparison of Acres of Crops in the DWR 2012 Land Use dataset and the VEGMAP dataset. These are not the same values used in the AG package as some crops were removed depending on irrigation source or non-irrigation. Only crops with comparable classifications are shown. On P. 16 – Table 4, shows pasture as 890. p. 22 – why end in 1990? How do these #s change with recycled water? Table 7 Average simulated irrigation depth by crop, pre-recycled water deliveries from 1975 to 1990 P. 19 – how much can this number (2 in.) change with soil type or management? All crops were assigned a value of 2 inches for the water holding capacity of the soil zone as defined by soil_moist_max and sat_threshold….Maximum available water holding capacity of capillary reservoir p. 20: Pastures were the dominant use of irrigation until 1983, after which vineyard irrigation has been the largest total use of groundwater irrigation in the sSubbasin. P. 23: does this mean the 1272 urban outdoor wells are not included? “Other sources of groundwater extraction, such as pumping for urban landscape irrigation are not included in the model”	

Date Received	Commentor	Comment	Responses to Comments
		P. 23 – was the original a daily model and revised is now monthly? "The representation of climate stresses in the model has been changed from the original approach of the SRPHM 1.0 of using daily grids of precipitation and minimum and maximum temperature, to an approach based on time series input for individual weather stations which are then interpolated spatially onto the model grid by PRMS subroutines." P. 24: or it seems daily at the two stations – hard to sort through: "On this basis, the updated time series for the two station locations are based on interpolation to the station locations directly from daily PRISM gridded data…l. The PRISM daily data sets only extend to January 1, 1981; therefore, the original USGS SRPHM v1.0 time series values are used for 1974-1980" P. 39: When considering all of the streamflow gage records, the updated SRPHM 1.0+ is generally well suited at simulating the monthly flow duration curves and the monthly average flow rates for summer and fall discharge. Figures 16-19 show little variation P. 29 - hard to sort through: Recycled water use has now been separated and is represented by adding recycled water volumes to the soil zone through a new input file using the PRMS Water Use Input Module. The use of this module also accounts for irrigation with recycled water when estimating rural pumpage with the Ag Package. For the most part, land irrigated with recycled water was within the Laguna de Santa Rosa 100-year flood-plain area, and is used for both landscape and agricultural irrigation (as seen on Figure 21 of USGS, 2013). (not sure about that statement) **COMMENTS BELOW REGARDING APPENDIX 3-2 (1-B): Future Groundwater Demands and Land Use Change** Municipal Water Demand Projections: Page 71: "While the ranges of future pumping estimates are generally inclusive of projections currently being developed for 2020 Urban Water Management Plans (UWMP) by each purveyor, in order to account for the significant uncertainty in the future projections and provide for a conservative estimate for the GSP projections, the maximum estimates generally assume higher levels of pumping in comparison with the UWMP projections." Comment: Looking at City of Santa Rosa's number from UWMP = 2,500 afy is mid-range. UWMP says peak is 2300 afy at Farmers wells. Sonoma Water's 1272 afy tracks peak use from 2000 but is half of the 2,300 afy per adopted UWMP. Will these numbers change with UWMP's adoption? Question: How does the model apply min /max numbers? Is it pre-determined (knowing in advance that Year 39 will be Dry) or as make-up after a Dry year? Or a function of ET during the irrigation season? http://santarosaplaingroundwater.org/wp-content/uploads/SRPGSP_Section-3_WBAppendix-1-B_042521_ADA.pdf	

Date Received	Commentor	Comment	Responses to Comments
		Page 60: 5.2.2.2 Sonoma Water Groundwater Facilities, Historical Groundwater Production, and Monitoring: Sonoma Water's three groundwater supply wells are located along Sonoma Water's aqueduct in the Santa Rosa Plain at Occidental Road, Sebastopol Road, and Todd Road. The wells were initially constructed in 1977, as emergency supply wells in response to the 1976-1977 drought. Two of the wells (Occidental and Sebastopol) were replaced in 1998. The three production wells range in depth from 794 to 1,060 feet with pumping capacities ranging from 1,300 to 2,200 gallons per minute (gpm). The locations of the wells are depicted on Figure 3-1 and their operational history is described below. Relatively continuous operations of the Todd, Sebastopol, and Occidental Road water supply wells began in April 1999, June 2001, and July 2003, respectively, and continued through 2008. The annual groundwater quantities pumped by Sonoma Water between 2006 and 2010 ranged from a high of 3,922 ac-ft in 2008 to a low of 52 ac-ft in 2010 and averaged 2,514 ac-ft/yr. Beginning in 2009, the use of the wells was shifted to a seasonal and as-needed basis to better balance the conjunctive management of Russian River and groundwater supplies (during years when sufficient supplies are available from the Russian River, use of the groundwater wells are is limited). Annual production from the three wells has ranged from 172 to 1,271 ac-ft from 2011 to 2015, averaging 643 ac-ft/yr and has declined further for the most recent five years (2016-2020) to an average of 20 ac-ft/yr. page 73 of 196 https://www.sonomawater.org/media/PDF/Water%20Resources/Sonoma%20Water%202020%20UWMP_Public%20Review%20Draft-ADA.pdf page 457 of 570 https://srcity.org/DocumentCenter/View/32225/1-UWMP---Complete-document-PDF?bidId= 2.2.1 Sources of Water Supply. Purchased Water: Sonoma Water also has three groundwater wells that provide water supply. They are located near the Laguna de Santa Rosa and feed directly into Sonoma Water's Russian River-Cotati Intertie Pipeline. Sonoma Water estimates the future production capacity of these wells at 2,300 AFY. Groundwater:	

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		Prior to 1960, the City relied primarily on groundwater from this sub-basin for its water supply, plus a small amount of surface water from Lake Ralphine. In June 1959, Sonoma Water began supplying surface water to the City and other Water Contractors. By the 1980s and until 2007, the City relied solely on purchased water deliveries from Sonoma Water to meet its water demands. In July 2005, the City received permission from California Department of Public Health (now Division of Drinking Water, or DDW) to use two groundwater wells (Farmers Lane Wells), formerly permitted as standby emergency wells, for full-time, active potable water supply. The Farmers Lane wells are located in the Santa Rosa Plain Sub-Basin. Groundwater trend data from the existing monitoring wells located throughout the Sub-basin indicate that water levels within the main portion of the Sub-basin have generally remained constant or have slightly increased over time, indicating that the Sub-basin is in balance and is not suffering from overdraft. This supply source is permitted for regular production of potable water. The Farmers Lane wells can provide up to 2,300 AFY.	

SANTA ROSA PLAIN GSP COMMENTS: SECTION 4 SUSTAINABLE MANAGEMENT CRITERIA			
Date Received	**Commentor**	**Comment**	Response to Comments
COMMENTS RECEIVED FROM OCTOBER 1-OCTOBER 31			
10/11/2021	Jim Mangels	We need to think out of the box to increase our ground water storage capacity. For example, if we have a seasonal high rain storm and the Russian River is overflowing, how about trying to capture some of the run-off more fully for storm water management. If property close to the Russian River was obtained for storage/banking the basins could recharge our ground water capacity. Purchase some vineyard property adjacent to the river--for the good of Sonoma County and build basins to capture some of the runoff.	Section 6, Projects and Management Actions, includes a description of groundwater banking projects to be implemented, including Aquifer Storage and Recovery and managed aquifer recovery.
10/31/2021	Community Alliance with Family Farmers	Sustainable Management Criteria. We are concerned that the metric for wells with historical declines then recovery uses 2010-2019, which include drought years when a number of local wells went dry and other significant impacts occurred. Setting these relatively low water levels as a base standard could allow for far greater impacts during future droughts.	As described in Section 4.5.3.1, the aim of the measurable objectives for RMPs which have exhibited recovering trends following historical declines is to maintain groundwater levels within recent observed ranges. This approach allows for setting the measurable objectives at more protective levels (shallower) than those observed during the historical declines. Including the drought years in calculating the average for 2010-2019 is also conistent with the GSP regulations which state that measurable objectives "...shall take into consideration components such as historical water budgets, seasonal and long-term trends, and periods of drought..."
		Regarding Depletion of Interconnected Surface Water – Setting a minimum threshold at 40 percent of representative monitoring point wells during drought years would allow for significant impact to riparian habitat including vegetation, aquatic species and all related ecosystems. Sustainable agriculture depends on healthy, diverse surrounding ecosystems that support populations of beneficial birds, insects and other creatures, and could have a significant impact on the potential loss of recharge opportunities.	As described in Section 4.10.4.1, these percentages for the number of minimum thresholds exceedances that cause undesirable results were selected based on input from the Interconnected Surface Water Practitioners Work Group (Appendix 4-C). Recognizing that sources of depletion are varied, and likely include lack of precipitation during drought years, placing the different weights on drought and non-drought years helps address concerns expressed by some Work Group and Advisory Committee members by ensuring that during normal/wet years the higher levels of estimated streamflow depletion from 2014-2016 are avoided. Additional details on potential effects of beneficial users related to undesirable results were added to Section 4.10.4.3. These potential effects will be further assessed through the studies and information gathering described in Section 7.2.4.
10/30/2021	Milo Baker Chapter of the California Native Plant Society	These comments were created after reviewing Section 4 of the Draft Groundwater Sustainability Plan (DGSP) for the Santa Rosa Plain Ground Water Subbasin; however, these comments are general enough that they can be applied to all three subbasins in Sonoma County.	Comment noted

Date Received	Commentor	Comment	Response to Comments
		The DGSP for the Santa Rosa Plain Groundwater Subbasin states that shallow aquifer is between 40 feet and 200 feet and a deep aquifer is 200 feet or more. We understand that it takes millennia for groundwater to percolate into the bedrock and up to centuries for water to percolate into the various formations. The surface flows from rain feed the watercourses. How is the DGWSP proposing to slow and recharge the aquafers and basins along the various creeks that run east to west to the Laguna? The Laguna is currently acting as a large recharge area but many of the creeks in the sub basin have been channelized. Are there any plans to improve our creeks through retention basins, flood plains and increasing canopy cover?	Section 6, Projects and Management Actions, includes a description of on- or near stream stormwater capture and recharge projects and managed aquifer recharge projects.
		The DGSP identifies various tools for evalua:ng the groundwater, from remote sensing to stream gauges and weather monitoring instrumentation, but this is monitoring, and the report does not discuss how they will apply this information. We are concerned that this is relying too much on deeper ground water resources and ignoring the shallower resources that are sustaining our native plants and vegetation communities. An additional cross check could be to use tree health, not only along riparian corridors but also in the plains. For example, valley oaks and their regeneration could be used for monitoring sub- surface waters levels. It has been documented that the best growth is attained when water tables are about 33 feet (10 m) below the surface and the trees are inundated every 5 years (Howard 1992). Ofen associated with seaonal wetlands, this species could be used to show the health of near surface water storage.	Section 5 of the GSP includes detailed monitoring plans, with information about monitoring the shallow aquifer. Comment noted on monitoring using tree health.
		One of the sustainability indicators of the DGSP (Table 4-1) is depletion of interconnected surface water, but the emphasis on streamflows ignores the seasonal wetlands and seeps that are also direct indicators and can be evaluated and mapped on Google Earth based on size. We are concerned that depletion of water levels below 40 feet will likely change the native vegetation within the Santa Rosa basin, especially wetland endemics that are some of the more rare and endangered plants in the County.	Seasonal wetlands and seeps that are considered groundwater-dependent are also included within the freshwater marsh/aquatic classification that is incorporated within the GDE map (Figure 3-19). As described in Sections 4.10.2.1 numerous and significant information and data gaps limit the GSA's ability to characterize the potential effects of groundwater conditions on biological response impacts to GDEs. Section 7.2.4 describes plans to fill these data and information gaps during the initial years fo GSP implementation, which would be used to consider future refinements of the SMC for chronic lowering of groundwater levels.

Date Received	Commentor	Comment	Response to Comments
		The DGSP identifies surface and groundwater budgets and estimates groundwater overdraft but how can that be known if you don't have a baseline. There are two periods identified, historical (1976-2018) and current (2012 – 2018). According to ca.water.usgs.gov drought years in the "historical period" occurred between 1976-1977 (2 year of drought), 1987-1992 (6 years), 2001-2002 (2 year), 2007-2009 (3 years), with normal or above normal rainfall in between years. In the "current year" drought years occurred between 2012-2016 (5 years) with only barely normal rainfall. Since 2000, the longest duration of drought in California lasted 376 weeks (December 27, 2011 – March 5, 2019) (7 years) (ca.water.usgs.gov) and that has been classified as a severe to extreme drought (ncdc.noaa.gov). NOAA also states that the 1980s and 1990s were characterized by unusual wetness with short periods of droughts of extensive droughts, while the first two decades of the 2000s saw extensive drought and extensive wetness. What will the baseline be after a 3-year extreme drought (2019-2021) that is classified as intense with higher evapotranspiration rates (due to higher air temperatures)?	The impact of climate (including the current drought) on groundwater conditions will be monitored and evaluated during GSP implementation. Data and information obtained through this monitoring will be incorporated into future 5-year updates to the GSP.
10-31-2021	Coalition	The consideration of beneficial uses and users when establishing sustainable management criteria (SMC) is insufficient. The consideration of potential impacts on all beneficial users of groundwater in the basin are required when defining undesirable results and establishing minimum thresholds. **RECOMMENDATIONS:** 1. Chronic Lowering of Groundwater Level. Describe direct and indirect impacts on DACs, drinking water users and tribes when describing undesirable results and defining minimum thresholds for chronic lowering of groundwater levels.	DACs in the GSP are grouped into beneficial user types based on their source of water supply, which is primarily municipal water or water from private domestic wells. The effects of minimum thresholds and undesirable results for chronic lowering of groundwater levels on all beneficial users, including DACs, drinking water users and tribes, are described in Sections 4.5.2.4 and 4.5.4.3, respectively. Additional language has been added to Section 4.5.4.3 to clarify that these specific beneficial users are considered. The methodology for establishing minimum thresholds for chronic lowering of groundwater levels incorporates the statistical evaluation of known completion information for water supply wells located within the vicinity of each potential RMP, to avoid potential impacts on existing well users, including DACs, drinking water users and tribes.

Date Received	Commentor	Comment	Response to Comments
		2. Degraded Water Quality. Describe direct and indirect impacts on DACs, drinking water users and tribes when defining undesirable results for degraded water quality. For specific guidance on how to consider these users, refer to “Guide to Protecting Water Quality Under the Sustainable Groundwater Management Act.”	DACs in the GSP are grouped into beneficial user types based on their source of water supply, which is primarily municipal water or water from private domestic wells. The effects of minimum thresholds and undesirable results for degraded water quality on all beneficial users, including DACs, drinking water users and tribes, are described in Sections 4.8.2.7 an 4.8.4.3, respectively. As described in Section 4.8.2.7, the minimum thresholds are designed to avoid negative effects to groundwater quality associated with implementation of the GSP. Avoiding degradation of groundwater quality from the identified COCs helps maintain drinking water quality providing benefits for domestic well users. Additional language has been added to Section 4.8.4.3 to clarify that these specific beneficial users are considered.
		3. Evaluate the cumulative or indirect impacts of proposed minimum thresholds for degraded water quality on DACs, drinking water users and tribes.	As described in Section 4.8.2.7, the minimum thresholds are designed to avoid negative effects to groundwater quality associated with implementation of the GSP. Avoiding degradation of groundwater quality from the identified COCs helps maintain drinking water quality providing benefits to DACs, drinking water users and tribes.
		4. Set minimum thresholds and measurable objectives for all water quality constituents within the subbasin that are impacted by groundwater use and/or management. Ensure they align with drinking water standards	As described in Section 4.8.1, the GSP identified COCs based on three criteria: 1. They have an established level of concern such as an MCL or secondary maximum contaminant level (SMCL), or a level that reduces crop production 2. They have been found in the Subbasin at levels above the level of concern and are routinely analyzed and reported through existing regulatory monitoring programs 3. The occurrence of the COC is extensive throughout the Subbasin New or additional water quality constituents may be identified as potential COCs applicable to the GSP implementation activities through the planned routine consultation and information sharing with other regulatory agencies described in Section 7.2.2. The GSA would then consider adding potential COCs and assigning SMC during the 5-year GSP updates.
		Groundwater Dependent Ecosystems and Interconnected Surface Waters **RECOMMENDATIONS:**	

Date Received	Commentor	Comment	Response to Comments
		When defining undesirable results for chronic lowering of groundwater levels, provide specifics on what biological responses (e.g., extent of habitat, growth, recruitment rates) would best characterize a significant and unreasonable impact to GDEs. Undesirable results to environmental users occur when 'significant and unreasonable' effects on beneficial users are caused by one of the sustainability indicators (i.e., chronic lowering of groundwater levels, degraded water quality, or depletion of interconnected surface water). Thus, potential impacts on environmental beneficial uses and users need to be considered when defining undesirable results in the subbasin. Defining undesirable results is the crucial first step before the minimum thresholds can be determined.	As described in Sections 4.10.2.1 numerous and significant information and data gaps limit the GSA's ability to characterize the potential effects of groundwater conditions on biological response impacts to GDEs. Section 7.2.4 describes plans to fill these data and information gaps during the initial years fo GSP implementation, which would be used to consider future refinements of the SMC for chronic lowering of groundwater levels.
		When defining undesirable results for depletion of interconnected surface water, include a description of potential impacts on instream habitats within ISWs when minimum thresholds in the subbasin are reached.15 The GSP should confirm that minimum thresholds for ISWs avoid adverse impacts to environmental beneficial users of interconnected surface waters as these environmental users could be left unprotected by the GSP. These recommendations apply especially to environmental beneficial users that are already protected under pre-existing state or federal law.	As described in Sections 4.10.2.1 numerous and significant information and data gaps limit the GSA's ability to characterize the potential effects of groundwater conditions on biological response impacts to GDEs. Section 7.2.4 describes plans to fill these data and information gaps during the initial years fo GSP implementation, which would be used to consider future refinements of the SMC for chronic lowering of groundwater levels.
		When establishing SMC for the subbasin, consider that the SGMA statute [Water Code §10727.4(l)] specifically calls out that GSPs shall include "impacts on groundwater dependent ecosystems".	GDEs are identified as beneficial users within the GSP and potential impacts on GDEs are specifically addressed with other ecological land uses and users in Section 4 for each sustainability indicator.

Date Received	Commentor	Comment	Response to Comments
10/28/2021	California Dept of Fish and Wildlife	**Sustainable Management Criteria (SMC) for Depletion of Interconnected Surface Waters (ISWs)** **Comment:** The GSA has established the following Minimum Threshold (MT) for the SMC for Depletion of ISWs sustainability criteria: "Maintain estimated streamflow depletions below historical maximum amounts. Metric: Shallow groundwater elevations are used as a proxy for stream depletion. The MT is the equivalent groundwater level, representing the 3 years (2014-2016) during which the most surface water depletion due to groundwater pumping was estimated between 2004-2018." Minimum Thresholds should ensure regional groundwater extractions do not lead to significant and adverse impacts on fish or wildlife resources by meeting plant and animal species temporal/spatial water needs including water availability especially for Threatened and Endangered species and Species of Special Concern. They should be designed to account for climatic/water year type variability. Where specific data are lacking, MTs should be conservative with respect to preserving fish and wildlife beneficial users of groundwater from undesirable results. Furthermore, the GSP states "undesirable result occurs if MTs are exceeded at 40 percent of RMP wells during drought years and 10 percent of RMP wells during non-drought years". It is unclear how these percentages relate to ecological impacts. The GSP should identify monitoring metrics for GDEs that will enable the GSA to characterize GDE vulnerability to groundwater depletion and associated undesirable results, and to undertake management intervention accordingly. The Department understands the need to use "placeholder" Sustainable Management Criteria and Minimum Thresholds due to the current lack of groundwater and stream discharge data throughout the planning area. However, numerous times during the Work Group meetings resource agency representatives commented that using a threshold that maintains estimated streamflow depletions at historically low levels is not appropriate for protecting ESA-listed salmonids. Setting Minimum Thresholds and measurable objectives using data from years with historically low rainfall (i.e., 2014-2016) would likely create historically high streamflow depletion rates and potentially negatively impact GDEs and their critical habitat.	**RESPONSE:** Thank you for the recommendation. As outlined in Section 4.10.4.2, groundwater pumping is one of several factors that can contribute to depletion of interconnected surface water (ISW), including factors outside of GSA jurisdiction, like surface water diversions, lack of precipitation, and evapotranspiration by riparian vegetation. Because depletion of ISW by groundwater pumping cannot be measured directly, determining the proportion of depletion due to pumping is challenging. Recognizing the significant information and data limitations, as well as the importance of ISW to beneficial users in the basin, the depletion of ISW by pumping SMC is set using an adaptive approach. The current Minimum Thresholds for each RMP were chosen to approximate the average amount of depletion during the 3 years with the highest levels of simulated streamflow depletion between 2004 and 2018. Mathematically, this 3-year average value over the 15-year evaluation period roughly corresponds with the 10th percentile of historical streamflow depletion at that location, by year, during 2004–2018. Undesirable results would occur if MT exceedances occurred at 40% or 10% of RMPs during drought and non-drought years, respectively. As described in Section 4.10.4.1, these percentages were selected based on input from the Interconnected Surface Water Practitioners Work Group (Appendix 4-C). Recognizing that sources of depletion are varied, and likely include lack of precipitation during drought years, placing the different

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		<u>Recommendation: The Department recommends reconsidering this Minimum Threshold and revising the GSP to address and describe:</u> · How Minimum Threshold prevents undesirable results; · The effect the Minimum Threshold will have on environmental beneficial uses and users of groundwater, and what impact it will have on fish and wildlife · How the Minimum Threshold accounts for climatic/water year type variability **Groundwater Elevations as a Proxy for Depletion of Interconnected Surface Water Minimum Thresholds**	weights on drought and non-drought years helps address concerns expressed by some Work Group and Advisory Committee members by ensuring that during normal/wet years the higher levels of estimated streamflow depletion from 2014-2016 are avoided. **RESPONSE:** Thank you for the recommendation. As stated in Section 4.10, it is recognized that low summer baseflow in certain years can impact aquatic species, but until the amount of summer baseflow needed for these species is quantified (e.g., via instream flow targets), the specific impacts of the MT on beneficial uses and users of groundwater remain difficult to quantify. The current approach leverages historical data to avoid conditions lower than historical surface water depletion amounts. **RESPONSE:** Thank you for the recommendation. As described in Section 4.10.4.1, undesirable results would occur if MT exceedances occurred at 40% or 10% of RMPs during drought and non-drought years, respectively. These percentages were selected based on input from the Interconnected Surface Water Practitioners Work Group (Appendix 4-C). Recognizing that sources of depletion are varied, and likely include lack of precipitation during drought years, placing the different weights on drought and non-drought years helps address concerns expressed by some Work Group and Advisory Committee members by ensuring that during normal/wet years the higher levels of estimated streamflow depletion from 2014-2016 are avoided.

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		Comment: While the GSP relied on a 15-year simulation to evaluate the correlation between surface water depletion from groundwater pumping and shallow groundwater levels at RMP locations, Appendix 4C states “Two RMP locations (SON0342, SON0552; Figs. 18, 20) showed poor simulated correlation between surface water depletion from groundwater pumping and shallow groundwater levels (R-squared values less than 0.60). Groundwater level proxy SMC values were still set for these RMP locations because poor correlation at these sites was attributed to poor process representation in the model at these RMP locations rather than insufficient hydrologic connection between surface water and shallow groundwater levels.” This highlights the simulation’s inability to capture areas where actual data shows a connection between surface and groundwater and calls into question the overall results of the simulation. In order for the GSA to use groundwater elevations as a proxy for depletion of interconnected surface water, the GSP should identify a significant correlation between groundwater elevations and interconnected surface water depletions as required by Title 23 CCR section 354.36(b)(1).The GSP currently attempts to correlate groundwater elevations with streamflow by modeling results; however, a specific rate or volume of surface water depletions caused by groundwater should be developed to correlate groundwater levels with streamflow depletions. If a significant correlation is not determined, groundwater elevations used as a proxy for surface water depletions may misinform groundwater management activities and poorly predict instream habitat conditions for fish and wildlife species. The current proposed approach to maintain shallow groundwater gradients at current/historic levels may serve as an interim management approach but should be revisited to include an improved understanding of the relationship between surface water-groundwater connectivity. **Recommendation:** The GSP should include discussion on what additional data will be collected to better inform the model and more details on when the simulation will be revisited and updated using this information.	

Date Received	Commentor	Comment	Response to Comments
			RESPONSE: Thank you for the recommendation. The Santa Rosa Plain Hydrologic Model (SRPHM) is a sophisticated GSFLOW model used to simulate inflows, outflows, exchanges, and stores of water in the surface-water and groundwater system. It is a thoroughly developed, documented, and tested tool that was originally developed by the US Geological Survey (Wolfenden and Nishikawa, 2014[1]) and revised by Sonoma Water for the purposes of developing more accurate water budgets for SGMA. The model leverages the best available data and science to accurately simulate key hydrologic processes. Where data are limited, the uncertainty of simulated hydrologic processes increases. The GSP notes that—like for nearly all GSAs—data are particularly limited for characterizing groundwater/surface-water interactions and surface water depletion due to pumping, resulting in greater uncertainty of these simulated processes. Appendix 4-C emphasizes that "[q]uantifying surface water depletion due to pumping is a challenge because (1) it cannot be measured directly and (2) the influence of surface water depletion by pumping is often obscured by other factors, such as precipitation and runoff, diversions, evapotranspiration, and natural groundwater/surface-water interactions."As noted in the comment, the GSP shows that two of seven RMP locations show poor correlations between simulated surface water depletion and simulated groundwater levels. The remaining five RMP locations show good correlation. Rather than "call[ing] into question the overall results of the simulation", these results highlight select RMP locations where additional data should be collected and the model should be adjusted to improve representation of these processes according to the adaptive management strategy outlined in Section 4.10. Additionally, Section 7.2, Section 5.4, and Appendix 7-A outline specific steps to implement additional studies and data gathering and improve model simulation of these processes during the implementation phase. As noted in Section 4.10 and Appendix 4-C, these improvements may inform the determination of appropriate revised SMCs for depletion of interconnected surface water. [1] Nishikawa, Tracy, ed., 2013, Hydrologic and geochemical characterization of the Santa Rosa Plain watershed, Sonoma County, California: U.S. Geological Survey Scientific Investigations Report 2013–5118, 178 p.

Date Received	Commentor	Comment	Response to Comments
10/31/2021	Russian Riverkeeper	p. 7: For the development of the SMC for streamflow depletions cause by groundwater pumping, we generally support the need to develop and use interim criteria until more appropriate and precise criteria, informed by studies relating groundwater levels, streamflow depletion rates, and instream habitat effects, can be developed. However, we do not agree with the decision to rely on historical maximum amounts for an interim minimum threshold until those studies are completed. This decision fails to give proper protection to public trust resources and listed species, especially during our increasingly dry years. For instance, simulated instream flow within Sonoma Creek during 2014, 2015, and 2016 was diminished by approximately 90 percent due to groundwater pumping. Thus, we concur with NMFS in their recommendation that while data is collected to inform that analysis, the GSA follow guidance by the California Department of Fish and Wildlife that recommends conservative sustainability management criteria be established to ensure groundwater dependent ecosystem protection.	Minimum thresholds represent the groundwater elevation below which significant and unreasonable depletions of streamflow occur and represents a condition the GSA seeks to avoid, not "maintain". The objective of SGMA is not to maintain levels at minimum thresholds but rather to be at the more aspirational measurable objectives by 2042, or even higher. A description of how public trust resources are incorporated into the SMC for interconnected surface water depletion has been added to Section 4.10.5.
		p. 9 : The GSP must set forth concrete steps that will be taken to establish legally sufficient SMCs, including impacts to Public Trust resources. SGMA requires corresponding projects and management actions, sufficient to support the determination by the SRBGSA that the sustainability goal will be met, be included in the GSP, and then implemented. The SRBGSA must separately demonstrate that it has fulfilled its duties under the Reasonable Use and Public Trust doctrines. Indeed, an attempt to avoid or minimize the harm to public trust uses is the second step required by the Public Trust Doctrine.	A description of how public trust resources are incorporated into the SMC for interconnected surface water depletion has been added to Section 4.10.5.
		p. 15: Groundwater plans should consider potential impacts to and appropriate protections for interconnected surface waters and their tributaries, and interconnected surface waters that support fisheries, including the level of groundwater contribution to those waters. In the context of SGMA statutes and regulations, and Public Trust Doctrine considerations, GSA groundwater planning must carefully consider and protect environmental beneficial uses and users of groundwater including fish and wildlife and their habitats: groundwater dependent ecosystems and interconnected surface waters. Public Trust resources have not been given due consideration throughout this GSP and analysis must be done to fully do so now and in the future.	A description of how public trust resources are incorporated into the SMC for interconnected surface water depletion has been added to Section 4.10.5.

Date Received	Commentor	Comment	Response to Comments
10/29/2021	Sebastian Bertsch	Table 4-1: "The MO is to maintain groundwater levels within historical observed ranges." This does not ensure protection of interconnected surface waters. There is not provided evidence that the current groundwater levels, let alone their historic lows, are sufficient to protect surface waters. Furthermore, the drought loophole allows further groundwater depletions beyond historic lows with no consideration for their impact on surface water.	As described in Appendix 4-B, information in the historical record linking surface water depletion and any related impacts to beneficial users directly to groundwater usage under the jurisdiction of the GSAs is very limited. For this reason, for this reason additional data collection focused on improving the understanding of surface water depletion is prioritized in the implementation plan. As additional information and data is collected during GSP implementation and potential impacts to benefical users, including GDEs, the measurable objectives will be further evaluated and refined as needed.
		Table 4-1: "The number of public supply wells with annual average concentrations of arsenic, nitrate, or TDS that exceed MCLs in groundwater quality data available through state data sources." According to this, the GSA will permit an unlimited number of private wells to become contaminated. The three MCLs also ignore other possible contaminates. Well owners who face contamination from pesticides, organic compounds or heavy metals will not be protected.	As described in Section 4.8.2.7, the minimum thresholds are designed to avoid negative effects to groundwater quality associated with implementation of the GSP. Avoiding degradation of groundwater quality from the identified COCs helps maintain drinking water quality providing benefits for domestic well users. As described in Section 4.8.1, the GSP identified COCs based on three criteria: 1. They have an established level of concern such as an MCL or secondary maximum contaminant level (SMCL), or a level that reduces crop production 2. They have been found in the Subbasin at levels above the level of concern and are routinely analyzed and reported through existing regulatory monitoring programs 3. The occurrence of the COC is extensive throughout the Subbasin There are other point source contaminants found sporadically in the Subbasin, but these are not regional in extent, are monitored through various other regulatory programs, and consequently SMC are not established in the GSP. New or additional water quality constituents may be identified as potential COCs applicable to the GSP implementation activities through the planned routine consultation and information sharing with other regulatory agencies described in Section 7.2.2. The GSA would then consider adding potential COCs and assigning SMC during the 5-year GSP updates.

Date Received	Commentor	Comment	Response to Comments
		Table 4-1: "Historical low elevations minus 4-year drought assumption. " This is a surprisingly low standard to set at the minimum. This doesn't take into account historic depletions, or have any consideration for ho these lower levels impact local ecologies and surface water. It is disappointing that the GSA's goal is to merely maintain water levels at the "worst they have ever been". The drought loophole also makes this standard effectively meaningless. If wells are allowed to be depleted beyond historic minimums, there is effectively no protection or performance standard.	Minimum thresholds represent the groundwater elevation below which significant and unreasonable conditions are likely to occur and represents a condition the GSA seeks to avoid, not "maintain". The objective of SGMA is not to maintain levels at minimum thresholds but rather to be at the more aspirational measurable objectives by 2042. Maintaining levels at minimum thresholds could certainly cause undesirable results and that is not the intention of SGMA nor this GSP. Historical depletions are taken into account and where there is uncertainty related to any known impacts to beneficial users from wells with more significant historical declines (greater than 100 feet), a warning-level threshold is established which would trigger investigation into potential causes and impacts prior to minimum thresholds being exceeded. Additionaly, the implementation plan includes the development of improved information on well depths and locations and GDEs to better inform potential impacts to beneficial users related to the minimum thresholds. This information and data collected during GSP implementation will help determine whether future modifications to the minimum thresholds are needed.
COMMENTS RECEIVED ON AUGUST 2021 VERSION			
8/27/2021	National Marine Fisheries Service	**Comment re: Minimum Thresholds:** To develop sustainable management criteria for the depletion of interconnected surface water, the GSAs of the Sonoma County subbasins convened a “Sonoma Sustainable Management Criteria for Depletion of Interconnected Surface Water Practitioner Work Group”, which met several times in early 2021. NMFS was a participant in this group, and generally agrees with the sequential approach being proposed within the Sonoma County subbasins for developing sustainable management criteria addressing streamflow depletion caused by groundwater pumping. Essentially, the approach is to develop and use interim criteria until more appropriate and precise criteria, informed by studies relating groundwater levels, streamflow depletion rates, and instream habitat effects, can be developed.	Comment noted

Date Received	Commentor	Comment	Response to Comments
		We understand the need to use "placeholder" sustainable management criteria due to the current lack of groundwater and stream discharge data throughout the County. Gathering this data during the first few years of GSP implementation and updating the sustainable management criteria accordingly is a sound plan. However, as raised numerous times during the Work Group meetings, we do not feel an interim minimum threshold that maintains estimated streamflow depletions at historical maximum amounts, as is currently proposed for the Santa Rosa Plain and Sonoma Valley subbasins, is appropriately protective when dealing with ESA-listed salmonids. Basic hydraulic principles dictate that groundwater flow is proportional to the difference between groundwater elevations at different locations along a flow path. Using this basic principle, groundwater flow to a stream, or conversely seepage from a stream to the underlying aquifer, is proportional to the difference between water elevation in the stream and groundwater elevations at locations away from the stream.	Minimum thresholds represent the groundwater elevation below which significant and unreasonable depletions of streamflow occur and represents a condition the GSA seeks to avoid, not "maintain". The objective of SGMA is not to maintain levels at minimum thresholds but rather to be at the more aspirational measurable objectives by 2042, or even higher. Maintaining levels at minimum thresholds could certainly cause undesirable results and that is not the intention of SGMA nor this GSP.
		Minimum thresholds and measurable objectives consistent with the lowest groundwater elevations on record would likely create historically high streamflow depletion rates that, when combined with low surface flow input, would be very likely to adversely affect ESA-listed salmonids and their critical habitat. Analysis within the draft Sonoma Valley subbasin Sustainable Management Criteria chapter confirms the significant impact to instream flow volume that would likely occur under the proposed minimum criteria – simulated instream flow within Sonoma Creek during 2014, 2015, and 2016 was diminished by approximately 90 percent due to groundwater pumping (Figure 23).	Measurable objectives have been established to represent the average dry-season groundwater levels between 2004 and 2020 and are not "consistent with the lowest groundwater elevation on record".
		Recommendation: NMFS is committed to working with GSAs, CDFW, and other stakeholders in determining what streamflow depletion level avoids significant and unreasonable impacts to beneficial uses of surface water, as those beneficial uses relate to ESA-listed salmon and steelhead survival and recovery. However, while data is collected to inform that analysis, we suggest the GSA follow guidance by the California Department of Fish and Wildlife that recommends conservative sustainability management criteria be established to ensure groundwater dependent ecosystem protection (CDFW 2019).	Comment noted

Date Received	Commentor	Comment	Response to Comments
		Comments re: Measurable Objective: The stated measurable objective (i.e., "maintain groundwater levels within historical observed ranges") is likewise inappropriate when considering streamflow depletion impacts on ESA-listed salmon and steelhead. According to DWR (2017), "measurable objectives are quantitative goals that reflect the basin's desired groundwater conditions and allow the GSA to achieve the sustainability goal within 20 years." Within groundwater subbasins where past streamflow depletion likely impacted ESA-listed salmonids and their habitat (e.g., near 90 percent depletion during 2014-16), maintaining groundwater levels within historical ranges is unlikely to result in sustainable groundwater management (i.e., avoiding all undesirable results) as required by SGMA regulation. **Recommendation:** We recommend the GSA craft measurable objectives that avoid potential streamflow depletion impacts on beneficial uses of surface water.	Measurable objectives have been established to represent the average dry-season groundwater levels between 2004 and 2020 and are not "consistent with the lowest groundwater elevation on record". In addition to the description of measurable objectives the commentor provides, DWR (2017) also states that measurable objectives shall "...take into consideration components such as historical water budgets, seasonal and long-term trends, and periods of drought, and be commensurate with levels of uncertainty". As additional information and data is collected during GSP implementation and potential impacts to benefical users, including ESA-listed salmon and steelhead, the measurable objectives will be further evaluated and refined as needed. Comment noted
9/9/2021	Beth Lamb	P. 1: This section identifies the sustainability goal, defines the conditions that constitute sustainable groundwater management, discusses the process by which the GSA will characterize undesirable results, and establishes MTs (MTs) and measurable objectives (MOs) for each applicable sustainability indicator. Comment: Spell out Minimum Thresholds (MTs) first use in this section P. 1: Defining these SMC included both a significant level of technical analysis utilizing currently available data and information and best available science and substantial input from stakeholders. Comment: Spell out Sustainable Management Criteria (SMC) first use in this section Tble 4-1: Comment This was a good way to try and simplify very conceptually complicated material Page 14 A saturated thickness factor of 10 feet was added to the 98th percentile shallowest supply well total depths. Comment - I don't understand the point of adding 10 feet to these well depths. Did I miss something? Page 17 Adaptive Management to Address Data Gaps and Improve/Refine Sustainable Management Criteria: Comment This is so important! General Comment this need a tech editor too many run on sentence and jargon language. Also too much use of acronyms. A tech editor should be able to clean these things up.	Comment incorporated - correction made. Comment incorporated - correction made. Comment noted. The "Calculation of Well Impact Depths" section describes the rationale for adding that 10 feet to well depths. Additional text has been added to clarify this rationale. Comment noted. Comment noted.

Date Received	Commentor	Comment	Response to Comments
9/7/2021	Robert Pennington	Chronic Lowering of Groundwater Levels define MTs and MOs for wells with two patterns: (1) Stable (2) Historical Declines and then recovery; Figure 4-1 and 4-2 has four patterns (1) stable, (2) decline and recovering, (3) decline and recovered, (4) No Trend. COMMENT: Are "No Trend" considered "stable"? Are "recovered" and "recovering" the same?	Text has been added to state that wells with recovering or recovered trends are treated the same. Text has been added to state that some wells have no trend, and SMCs are not set for these wells
		I suggest modifying the MT and MO to be inclusive of trends identified in Figure 4-1, AND other hypothetical trends such as "declining" or "decline then stable". I recommend this because new RMP may be added sometime in the future and they may have trends that do not fit into the defined categories of this draft.	Comment noted.
		MTs and MOs reference "historical" or "recent". It appears that "historical" for the MOs and MTs is not being used consistently with the model periods from the Basin Setting section. It also appears that different data ranges are used for RMPs with different trends. It could be confusing 20 or 50 years to know what date ranges should be compared against. This could be particularly problematic for RMP with "No Trend" or no data within the "historic" range, it may be useful to develop alternative MOs and MTs for these.	Definitions have been added to the Glossary.
		I suggest creating a table that specifies the date ranges or definitions of "recent" and "historic" for RMPs with various trends.	Text has been added to state that some wells have no trend, and SMCs are not set for these wells
		Table 4-2 does not have rows for many RMPs from Figures 4-1 and 4-2 that have "No Trend". Is that because these RMPs have not been established? Or are these "missing RMPs" not included because they are for streamflow depletion, not chronic lowering?	Comment noted
8/26/2021	Matt O'Conner	4.10.2.1 Information and Methodology: Table 4.8 would be improved by including the range of streambed elevation where flow depletion is of concern that would be indicated by each RMP well along with relevant information from the model regarding how the stream elevation is represented in the model (i.e. what is the reference elevation used by the model for the stream reach of interest). This is important for interpretation because the scale of the GSFLOW model creates stream reaches of substantial length over which bed elevation changes. This is a form of sensitivity analysis that should also be considered in adaptive management.	Comment noted

Date Received	Commentor	Comment	Response to Comments
		4.10: Depletion of Interconnected Surface Water: Limitations of historical data are understood; did the GSA staff and/or practitioner group consider whether or not data from the California Environmental Flow Framework beneficially informs regarding the spatial and temporal distribution of flow depletion? If not, GSA staff should consider evaluation of this tool.	Comment noted
8/19/2021	Peter Martin	p.1. ""Seawater intrusion is not applicable to the Subbasin and therefore no SMC are defined for this sustainability indicator."" Are there other GSPs that take this approach of not addressing this as an SMC? I fully understand the approach but sometimes try to do my best to ""think like a regulator""	SGMA regulations (354.24) state that SMCs must be devloped for "...each applicable sustainability indicator." SMCs are not required for sustainability indicators that are not applicable.
		p.2. "Representative monitoring sites" - Is this the same as RMPs referenced later?	Yes, additional text has been added to clarify that these are the same as representative monitoring points (RMPs).
		"p.4. ""A discussion of the measures that will be implemented to ensure the Subbasin will be operated within sustainable yield • An explanation of how the sustainability goal is likely to be achieved. Note to Readers: The following information on Sustainability Goal will be reviewed updated when the GSP is completed.Description of Sustainability Goal: "Recommend we add a note that we are not only ""ensuring"" sustainability with these criteria, but will be providing description in the following of how we'll demonstrate that we're achieving sustainability.Should make sure we are responsive to the SGMA regs § 354.24. Sustainability Goal. portion ""including information from the basin setting used to establish the sustainability goal"" Recommend that we could have some overarching statement about how measures are currently stable with regard to groundwater levels about how we are targeting no additional decline in groundwater levels during the planning horizon. ""SMC"" change to ""SMCs""."	Comment noted
		p.5. "Sonoma Valley Basin Management Plan" - Not familiar with this plan being referenced?	Reference deleted
		p.10. p.5. "Sonoma Valley Basin Management Plan" - Not familiar with this plan being referenced?	Reference deleted
		p.10. "vegetation" - Should we say ecosystems?	Comment noted. SMCs based on locations of vegetation that indicate GDEs.
		p.5. "five applicable sustainability indicators" - text highlighted	Comment noted.
		p.22. "principal aquifer system" - Recommend spelling out shallow and deep here rather than reference principal aquifer system.	Change made

Date Received	Commentor	Comment	Response to Comments
		"p.24. ""These tasks would generally be performed sequentially based on potential severity of the occurrence."" - Do we need to speak to timelines on this? i.e. annual or quarterly data reviews? Perhaps this is covered in later chapters."	Comment noted. A timeline is likely not necessary at this point.
		p.24."Lowered groundwater levels reduce the saturated thickness of aquifers from which wells can pump, which could lead to increased pumping costs or the need to drill new deeper wells." - Also decreased pumping capacity?	Text added
		p.24. "Maintaining groundwater elevations within the operational range between MTs and MOs is equivalent to no long-term change in storage." should we swap out "change" with "decline"?	Comment noted. Text not changed
		p.24. "yield" missing period here	Text fixed
		p.25. "sustainability" - Should be SMC	Comment noted. Text not changed
		p.25. "sustainability" - Sustainability indicator or criteria?	Comment noted
		p.30. "SNMP" I don't believe this acronym was defined	Acronym now defined
		p.37. "which can impact agricultural irrigation, helps maintain groundwater quality providing positive benefits to the Subbasin's agricultural water users." We may want to highlight (how) degraded water quality could impact these users like in earlier sections.	Comment noted
		p.41. "Any" - lowercase	Text fixed
		p.46. "conducted" - how often?	Comment noted
9/1/2021	Bob Anderson	P. 3: Format: Some have bullets, some do not.	Comment noted
		P. 16 of Exec Summary, definitiions show terms separately for conditions and results, while page 4 of Sect 4: Undesirable Result is not defined in the definitions section of the GSP Regulations (Section 351). However, the Regulations' description of undesirable result states that it should be a quantitative description of the combination of MT exceedances that cause significant and unreasonable effects in the Subbasin. Undesirable results should not be confused with significant and unreasonable conditions, as described above.	The executive summary no longer contains definitions.

Date Received	Commentor	Comment	Response to Comments
		implemented; actions proposed to fill data gaps and reduce uncertainty; inform future refinement and possible modification; the identified measures may not be implemented; some combination of these measures will be implemented; Subbasin is operated within its sustainable yield and achieves sustainability; sequencing of measures that are considered likely to be implemented; there are significant uncertainties related to this approach – page 35 of 78; a substantial simplification that (1) does not differentiate between wells; and (2) simulates conditions outside of the calibrated range of the model; additional uncertainties compound the uncertainties and simplifications inherent to the calibrated model; analysis is especially useful for evaluating the relative magnitudes of surface water depletion; outline a framework for achieving sustainability page 2 of 14; many details must be negotiated before many of the projects and management actions can be implemented; demonstrate that sufficient options exist to reach sustainability; should be considered a list of options that will be refined; Inclusion and further assessment of these initiatives and activities during implementation of the GSP will facilitate coordination and optimization of these initiatives and activities to support sustainable groundwater management.; based on limitations and uncertainty related to the potential for future expansion of recycled water supplies, additional expansion of recycled water deliveries for irrigation supplies is not included; other ideas for projects and actions raised by Advisory Committee members would need to be further developed and planned in order to evaluate with model scenarios; recommendations on preferred tools and strategies for implementing, including options for incentivizing; initial implementation steps include performing studies or analyses to refine the concepts into actionable projects; the planned initial assessment of Group 1 projects will include recommendations for evaluating specific metrics related to Group 1 implementation; focused outreach to rural residential and agricultural stakeholders on benefits of participating; first stormwater capture activity involves retaining and recharging onsite runoff; timing of projects is based on best estimates and may shift	Comment noted
		P. 6: Identification of technical data sources in the Subbasin and review of information developed for the Sonoma Valley Basin Management Plan.	Text corrected
		p. 10: “assisted”? SGMA definition of an undesirable result assisted in characterizing significant and unreasonable conditions	

Date Received	Commentor	Comment	Response to Comments
		P. 10: important but not clearly stated. The recovering trends generally occur within the southern and western portions of the Subbasin and are associated with higher levels of municipal pumping that historically occurred through the late 1970s and early 2000s that has since been reduced.	Comment noted
		P. 44: Petaluma Valley Subbasin	Text corrected
		P. 46: check the wording: Since the GSP Regulations allow for elastic and inelastic subsidence due to natural conditions such as plate tectonics and hydrostatic loading, these phenomena are considered with definition of undesirable results.	
		p. 47: Is land subsidence to be measured at nearby wells? Or only groundwater levels? Evaluation of time series plots of groundwater levels and land subsidence from nearby monitoring wells	Comment noted. Text edited.
		p. 47: Any change? Less / more pumping? • If the location and rates of groundwater pumping change as a result of projects implemented under the GSP, subsidence may occur.	Comment noted. Text edited.
		P. 53: Petaluma Valley Basin,!	Text corrected
		P. 54: maybe check the wording: Effect on Beneficial Uses and Users The minimum thresholds for depletion of interconnected surface water measured using groundwater levels as a proxy assumes that maintaining groundwater levels at or above historical low levels in the Subbasin, will avoid surface water depletion that exceeds historical levels. Avoiding surface water depletion at levels greater than historical conditions will provide a benefit to beneficial users and land uses that rely on interconnected surface water	Comment noted
		P. 55: it was decided that MO values at RMP locations should maintain the observed average dry-season surface water depletion from pumping that occurred during the years with available observations during 2004–2020	Minimum thresholds are based on the years 2004 to 2018. Measurable objectives are based on data from years between 2004 and 2020. The language is now consistent in the GSP.
		P. 51: The MTs developed using this methodology are provided in Table 4-8 and represent: The equivalent groundwater-level, representing the three years (2014–2016) during which the most surface water depletion due to groundwater pumping was estimated between 2004–2018. Use model to estimate the 3 years with highest levels of simulated streamflow depletion between 2004 and 2018	Minimum thresholds are based on the years 2004 to 2018. Measurable objectives are based on data from years between 2004 and 2020. The language is now consistent in the GSP.
		P. 55: see page 51 of 57: As the MOs are set at the average groundwater elevations during recent years (average of 2004–2020), interim milestones are identical to the groundwater levels associated with the MOs.	Minimum thresholds are based on the years 2004 to 2018. Measurable objectives are based on data from years between 2004 and 2020. The language is now consistent in the GSP.
		COMMENTS BELOW RELATED TO APPENDIX 4-C	

Date Received	Commentor	Comment	Response to Comments
		P. 35: not finding Figs 4-10: Simulated differences in streamflow for pumping and no-pumping scenarios are shown for all RMPs in Figs. 4–10. p. 37: using available observed historical dry-season low groundwater levels during 2004–2020…with available observations during 2004–2020. Accordingly, MO values at each RMP are set to reflect average dry-season observed groundwater levels during the years with available observations during 2004–2020. MO values for each RMP are summarized in Table 1 and are shown in Figs. 20–36. P. 38: Since the dedicated shallow monitoring wells at RMP locations were installed in fall 2019, there is limited data to directly estimate the average dry-season groundwater levels during 2004–2015	Text is modified to clarify this means figures 4 through 10 Minimum thresholds are based on the years 2004 to 2018. Measurable objectives are based on data from years between 2004 and 2020. The language is now consistent in the GSP. Comment noted
COMMENTS RECEIVED ON JUNE 2021 VERSION			
7/14/2021	Bob Anderson	Page 6 of 112: Seawater not applicable – but then seawater is included The five sustainability indicators relevant to this Subbasin include: chronic lowering of groundwater levels; reduction of groundwater storage; degraded water quality; land subsidence; and depletion of interconnected surface waters. Seawater intrusion is not applicable to the Subbasin. Undesirable Result means one or more of the following effects caused by groundwater conditions occurring throughout the basin, as described in Water Code Section 10721(x): o Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply if continued over the planning and implementation horizon. Overdraft during a period of drought is not sufficient to establish a chronic lowering of groundwater levels if extractions and groundwater recharge are managed as necessary to ensure that reductions in groundwater levels or storage during a period of drought are offset by increases in groundwater levels or storage during other periods. o Significant and unreasonable reduction of groundwater storage. o Significant and unreasonable seawater intrusion. P 5-6: Definitions need work – to be a narrative but “storage reduction” suggests a number plus “significant and unreasonable” appears in definition for Undesirable Result. Undesirable results should not be confused with significant and unreasonable conditions, as described (below):.	Text revised Text revised Text revised

Date Received	Commentor	Comment	Response to Comments
		"Significant and unreasonable conditions" is a phrase used to identify conditions that lead to undesirable results but is not specifically defined in the GSP Regulations. This expression is often confused with, or used interchangeably with, undesirable results. However, significant and unreasonable conditions, are a narrative description of physical conditions to be avoided; an undesirable result is a quantitative assessment based on minimum thresholds. Defining significant and unreasonable conditions early in the process of developing SMC for each sustainability indicator helps set the framework by which the quantitative SMC metrics are determined. Undesirable Result means <u>Significant and unreasonable reduction of groundwater storage</u> 4.2 Sustainability Goal: Note: The following information will be updated when the GSP is completed. Note noted – but critical piece is missing. When will it be available? These measures will achieve sustainability within 20 years by the following means: Note: The effects of the projects and actions will be included here once finalized. p. 8: Table 4-4-1 provides a summary of the SMCs for each of the six sustainability indicators. Table 4-4-1 contains 5 indicators. As noted previously on page 6 of 112 ¬- Seawater intrusion is not applicable to the Subbasin. p. 24: 4.5.2.4 Effect on Beneficial Uses and Users Minimum thresholds for chronic lowering of groundwater levels are set at the more protective of historical low conditions with allowances for future droughts and the depths at which existing wells could be impacted by lowering of groundwater levels. [Seems maybe "trying a bit too hard" to address existing wells] [Also: "and the depths at which" is not very precise.] p. 25: Historical and current measurement frequency for the 26 existing wells in the RMP monitoring networks include the following: • 18 measured sub-daily • 4 measured monthly • 4 measured semi-annually = Totals 24	Text revised Text revised Text revised Text added Text added Text revised This is a summary of the approach used, which is explained in more detail in Section 4.5.2.1. 18 + 4 +4 = 26

Date Received	Commentor	Comment	Response to Comments
		Staff has identified data gaps in some areas of the basin, and the GSP would include a plan to expand the monitoring network. Where is this located? For each group below – "existing" appears – Doesn't the Baseline 50-year looks to add future component to each group? Agricultural land uses and users. The chronic lowering of groundwater level minimum thresholds protects existing agricultural users' ability to meet typical demands by maintaining groundwater levels near current conditions. Urban land uses and users. The chronic lowering of groundwater level minimum thresholds protects existing municipal groundwater users' ability to meet typical demands by maintaining groundwater levels near current conditions. Domestic land uses and users. The chronic lowering of groundwater levels minimum thresholds are established to protect as many domestic wells as possible. Therefore, the minimum thresholds will likely have an overall beneficial effect on existing domestic land uses by protecting the ability to pump from domestic wells within the Subbasin. Page 25 of 112: Isn't this a rather bold declaration re GDE "the very connected" when elsewhere it is stated we need more data to understand "nature of groundwater and surface water?" *Ecological land uses and users. Maintaining groundwater near or above historical levels will help maintain the very connected nature of groundwater and surface water in the Subbasin.*	Section 5 The future baseline already includes new projected pumping. The analysis of effect on beneficial users is not addressed for each individual user. These effects are generalized based on anticipated future conditions. Text revised

Date Received	Commentor	Comment	Response to Comments
		Page 25 of 112: Is this the method used in Table 4-5-1 Observed Historical Low (ft msl)? 4.5.2.6 Method for Quantitative Measurement of Minimum Thresholds Depth to groundwater will be directly measured at the RMPs identified in Section 5.3.1 for comparison to minimum thresholds. The RMP network includes 14 existing shallow aquifer wells and 12 existing deep aquifer wells, plus four planned multi-level monitoring wells. The groundwater level data will be collected in accordance with the monitoring protocols outlined in Section 5.3.1 and converted to groundwater elevation by subtracting the measured depth to water from the reference point elevation used to take the depth to water measurement. Will this be updated and cite to Implementation once that Section is completed? Staff has identified data gaps in some areas of the basin, and the GSP would include a plan to expand the monitoring network. Page 26 of 112: For RMPs hat have exhibited recovering -- that Measurable objectives for each RMP are listed on Table 4-5-1. However, Table 4-5-1 (on page 20 of 112) includes only 19 wells – 26 in the list of RMPs (page 21 of 112: of the 26 existing RMPs) From page 28 of 112 This looks like a To-Do list that has the potential for high cost in terms of effort and expense? 34 RMPs Trigger within this is MT, not URs. Additionally, in order to respond to these potential conditions prior to the onset of an undesirable result the following actions would be implemented if an MT is exceeded at a single RMP that does not trigger an undesirable result: •Review available data from full monitoring network (i.e., non-RMP monitoring wells) to assess potential scale of areas exhibiting declines	Yes. This is the method used. Gaps identified in Section 5. Table revised The approach is a proactive means for avoiding exceedance of undesirable results when warning signs are available. Not all actions would be implemented for each individual exceedance of a minimum threshold. The tasks described above would generally be performed sequentially based on potential severity of the occurrence.

Date Received	Commentor	Comment	Response to Comments
		• Assess whether exceedance is climate-related • Review of any known or potential changes in groundwater pumping patterns (eg, new wells brought on-line, changes in land/water use, etc.) • Consider whether additional RMPs are needed • Information-sharing with nearby well owners as appropriate • Consider planning or implementing projects/actions, as appropriate (eg, begin with lower cost and/or voluntary projects/actions)	
		Page 29: It would be good to have the "sustainable yield" discussion in Section 3 to compare to its use here: [pumping 'exceeding' sustainable yield is potentially a big factor and is unknowable to this reader at this point in time]	Sustainable yield discussion will be added in Sect 3 and 4 in the nect draft for public review.
		Reduction of groundwater storage that causes significant and unreasonable impacts to the long-term sustainable beneficial use of groundwater in the basin, as caused by: • Long-term reductions in groundwater storage; or • Pumping exceeding the sustainable yield	
		Do we really "achieve" minimum thresholds? Therefore, using groundwater elevations as a proxy, the minimum threshold for groundwater storage will be met if minimum thresholds for the chronic lowering of groundwater levels are achieved.	Text revised
		Page 30 of 112: This is 4.6.2.2 – circular reference (See below). And, this text is unclear: the reduction in groundwater storage sustainability indicator would not cause undesirable results for the chronic lowering of groundwater levels sustainability indicator.	Text revised for clarity; subsection numbering changed.
		4.6.2.2 Relationship between Individual Minimum Thresholds and Relationship to Other Sustainability Indicators The minimum thresholds for reduction in groundwater storage are the same as those used for the chronic lowering of groundwater sustainability. Because groundwater elevations will be used as a proxy for estimating groundwater pumping and changes in groundwater storage, the reduction in groundwater storage sustainability indicator would not cause undesirable results for the chronic lowering of groundwater levels sustainability indicator.	

Date Received	Commentor	Comment	Response to Comments
		The relationship between the groundwater storage sustainability and other sustainability indicators is the same as the relationship between chronic lowering of groundwater levels and other sustainability indicators, as described in Section 4.6.2.2. 4.6.2.4 Effect on Beneficial Uses and Users The minimum threshold for reduction in groundwater storage will maintain stable average groundwater elevations and encourages minimal long-term net change in groundwater elevations and storage. The potential effects of the groundwater storage minimum threshold on beneficial uses and users are the same as the potential effects described for chronic lowering of groundwater levels in Section 4.6.2.4. circular reference 4.6.3.1 Method for Setting Measurable Objectives The methods for setting the measurable objective for groundwater storage incorporates the same methods for setting the measurable objective for chronic lowering of groundwater levels described in Section 4.6.3.1. circular reference 4.6.4.2 Potential Causes of Undesirable Results The potential causes of undesirable results for reduction of groundwater storage are the same as those identified for chronic lowering of groundwater levels in Section 4.6.4.2:	Subsection numbering changed Subsection numbering changed

Date Received	Commentor	Comment	Response to Comments
		4.6.4.2 Potential Causes of Undesirable Results The potential causes of undesirable results for reduction of groundwater storage are the same as those identified for chronic lowering of groundwater levels in Section 4.6.4.2: • increased groundwater pumping in the Subbasin leading to chronic groundwater level declines; or • a significant reduction in natural recharge as a result of climate change. 4.6.4.3 Effects on Beneficial Users and Land Use The potential effects of undesirable results for groundwater storage on beneficial users and land use are the same as those identified for the chronic lowering of groundwater levels, as described in Section 4.6.4.2, ??? that section is groundwater storage Page 33 of 112 Are we implementing water Quality SMC that is 'degraded?' One of the primary challenges in implementing the degraded water quality SMC will be to assess in the future if any degradation to groundwater quality is due to SGMA activities, and specific projects and management actions may include focused groundwater quality monitoring as appropriate. And on page 42 becomes degradation of groundwater quality Page 37: Two paragraphs – bounce between "existing wells" and "public water supply wells" and introduces "new" 4.8.2.3 Development of Minimum Thresholds at Supply Wells	Subsection numbering changed We are implementing SMC. Text revised for consistency Text revised for consistency

Date Received	Commentor	Comment	Response to Comments
		The minimum thresholds for degraded water quality for the supply wells are based on the number of additional exceedances of any MCL or SMCL in existing wells shown in Table 4-8-5. Establishing the minimum threshold as the number of additional exceedances accounts for wells with previous exceedances, assuming these exceedances will likely continue into the future. The GSA Board selected two as the number of additional wells with exceedances to represent the minimum threshold. The minimum threshold for the number of allowed exceedances is therefore equal to the baseline number of exceedances (calculated as the number of public water supply wells with any MCL or SMCL exceedance between 2015 and 2020) plus two additional public supply wells with an exceedance. Based on the number of public supply wells in the existing water quality monitoring network, the number of existing exceedances since 2015 for each constituent is tabulated in Table 4-8-6 and the distribution of exceedances are shown on Figures 4-8-1 through 4-8-3, along with all of the other public water supply wells included in the initial RMP network. Minimum threshold exceedances are based on existing wells only. According to the GSP Regulations, the minimum thresholds are based on the same number of wells to have exceedances, not necessarily the same wells. The well networks will be re-assessed every 5 years to identify any new wells that could be added to the monitoring networks. The minimum threshold will be increased by one for each new well added to the monitoring network with an initial measured concentration exceeding the MCL or SMCL. Additionally, if the MCL or SMCL changes for a GSP-identified COC, the specific minimum threshold should be examined and updated as appropriate. Page 44: Here the wells become “supply wells” – these are different than “public supply wells” in 4.8.2.3 Therefore, the GSA has set the measurable objective for each COC to the number of existing supply wells that exceeded the MCL or SMCL from 2015 to 2019 as shown in Table 4-8-6. In other words, the measurable objective is to have zero additional supply wells exceeding the applicable MCL or SMCL for any of the COCs.	Text revised for consistency

Date Received	Commentor	Comment	Response to Comments
		Page 56: Confusing text – the “initial SMC” was “developed” and will be “refined” and “historical” updated As detailed in Appendix 4-10-2, the initial SMC for depletion of interconnected surface water was developed based on simulated data and the best available historical information that will be updated and, where appropriate, refined with actual observed data during the implementation phase.	
		Page 58: Confusing text -- Assessment of how other sustainability indicators could be influenced by the depletion of interconnected surface water minimum threshold indicates the following: • Chronic lowering of groundwater levels. Groundwater levels are used as a proxy for monitoring the depletion of interconnected surface water minimum thresholds. Because the minimum thresholds for the depletion of interconnected surface water are generally set within close proximity to streambed elevations within the Subbasin, they are shallower (more protective) than minimum thresholds set for nearby RMPs for the chronic lowering of groundwater levels If groundwater levels. Therefore, the depletion of interconnected surface water depletion will not result in exceedances for chronic lowering of groundwater level minimum thresholds. • Reduction in groundwater storage. Minimum thresholds for depletion of interconnected surface water do not promote pumping in excess of the sustainable yield that is needed to ensure change of groundwater in storage does not cause undesirable results. Therefore, the minimum threshold for depletion of interconnected surface water minimum thresholds will not result in an exceedance of the groundwater storage minimum threshold. Seawater Intrusion. Minimum thresholds for depletion of interconnected surface water are intended to maintain groundwater levels near streams above historical levels which is not anticipated to lead to seawater intrusion.	Text revised
		Pages 6 and 32: 4.7 Seawater Intrusion SMC The Subbasin does not border the Pacific Ocean, bays, deltas, or inlets and therefore seawater intrusion is not an applicable sustainability indicator and is not further discussed in this GSP.	Text revised Corrected

Date Received	Commentor	Comment	Response to Comments
		Page 58:From Basin Setting – streams do flow into Healdsburg Subbasin The reaches of interconnected streams within the Subbasin that are subject to the minimum thresholds for depletion of interconnected surface water are separated by surface water divides from the Petaluma Valley Basin and do not flow into the Healdsburg Area Subbasin or the Wilson Grove Formation Highlands Basin. See page 9 of 67 - Water Budget Groundwater Outflows: • Crop, native vegetation and riparian evapotranspiration (ET) • Groundwater pumping (including municipal and industrial, rural-domestic, and agricultural) • Groundwater discharge to streams • Subsurface outflows: o Outflow to Wilson Grove Formation Highlands Subbasin (Wilson Grove Subbasin and Wilson Grove Subbasin Boundary Condition in Figure 1-2) o Outflow to Healdsburg Area Subbasin (Healdsburg Area Subbasin Boundary Condition in Figure 1-2) Page 59: 4.10.2.4 Effect on Beneficial Uses and Users The minimum thresholds for depletion of interconnected surface water measured using groundwater levels as a proxy assumes that maintaining groundwater levels at or above historical low levels in the Subbasin, Becomes… Agricultural land uses and users. Maintaining the interconnection of surface water and groundwater at historical levels should not impact agricultural land uses or irrigation water supplies. Urban land uses and users. Municipal groundwater pumpers are not anticipated to be affected if surface water interconnection with groundwater remains similar to historical levels. Domestic land uses and users. Maintaining surface water interconnection with groundwater at or above historical levels will protect residential beneficial users of groundwater by keeping groundwater levels at or above historical low levels.	Refrred text from water budget diisucssed groundwater outflow, not surface water outflow. Comment noted

Date Received	Commentor	Comment	Response to Comments
		Page 54: for interconnected surface water are documented in Appendix 4-10-1. As described in Appendix 4-10-1, the SMC for depletion of interconnected surface water is unique in that information in the historical record linking surface water depletion directly to groundwater usage under the jurisdiction of the GSAs is very limited. Page 60: 4.10.3.1 Method for Setting Measurable Objectives A description of the specific methodology used for developing the measurable objectives for the depletion of interconnected surface water sustainability indicator is provided in Appendix 4-10-1. Page 68: This is number for citation above to Appendix: Appendix 4-10-2 Development of Sustainable Management Criteria for Depletion of Interconnected Surface Water—Santa Rosa Plain GSP Years begin 2004-2018 but then shift to 2004-2020: Page 60:Based on input from the work group, as well as from the Advisory Committee and GSA Board, it was determined that MO values at RMP locations should maintain the observed average dry-season surface water depletion from pumping that occurred during the years with available observations during 2004–2018. The measurable objectives for the depletion of interconnected surface water are the average dry-season observed groundwater levels at each RMP during the years with available observations during 2004–2018. Page 69: 2.2 Demonstrating Correlation between Groundwater Levels and Surface Water Depletion at RMP Locations : To evaluate the correlation between surface water depletion from groundwater pumping and shallow groundwater levels at RMP locations, this methodology focused on a 15-year simulation period from 2004–2018 Page 71: To set the groundwater-level proxy MT value at each RMP location, the method relies on evaluating the resultant percentile ranking for each RMP (Table 1) using available observed historical dry-season low groundwater levels during 2004–2020. 3.2 Methodology for Determining Groundwater-Level Measurable Objectives at RMP Locations	Corrected Corrected to 2004-2020. 2020. These portions of the text will be corrected. 2004-2020 was used as the time period for MOs because unlike the percentile approach with the model used for the MTs, which only simulates to 2018, the MO is based on the average of measured dry-season GWLs, some of which extend beyond 2018 to 2020. Corrected to 2004-2020 Correct

Date Received	Commentor	Comment	Response to Comments
		Based on input from the Depletion of Interconnected Surface Water Work Group, as well as from the SRP Advisory Committee and Board, it was determined that MO values at RMP locations should maintain the observed average dry-season surface water depletion from pumping that occurred during the years with available observations during 2004–2020. Accordingly, MO values at each RMP are set to reflect average dry-season observed groundwater levels during the years with available observations during 2004–2020. MO values for each RMP are summarized in Table 1 and are shown in Figs. 20–36. 3.2.1 Transferring Groundwater-Level Measurable Objective Percentile Ranking Value from Adjacent Wells Since the dedicated shallow monitoring wells at RMP locations were installed in fall 2019, there is limited data to directly estimate the average dry-season groundwater levels during 2004–2015 at these dedicated wells.	Correct
July 12, 2021	John Rosenblum	p.7 regarding Sustainability Goals, there are 2 bullet points “careful monitoring of groundwater conditions” and ”close coordination with other entities...” Neither have been followed regarding existing reports about Wilson Grove Highlands that will potentially impact 4 GSA members in the Sebastopol area. p.23 regarding regarding the boundary with Wilson Grove Highlands, the conclusion that there will limited effect within the Santa Rosa Plain Subbasin might be correct – but besides the point for the 4 GSA members in the Sebastopol area. Since the staff modelling and analysis is blind to land use and well extractions west of Sebastopol, the GSP provides no protection/warning of developing trends in our recharge area. At the very most, GSA action might be considered after 2032 – long after significant chronic reductions in our wells’ groundwater levels have been identified. p.27 regarding Potential Causes of Undesirable Results has 2 bullets revealing a dichotomy of GSA staff consideration. The first again limits concern only to increased groundwater pumping within the GSA boundaries, i.e. missing the impact of increased pumping outside the Bulletin 118 boundary. The second bullet regarding natural recharge impacts from climate-change might give feeble hope to those of us on the western boundary. However, I anticipate “clever” word-smithing to dash any hope.	Comment noted The comment is correct that extractions west of Sebastopol, which are not in the Santa Rosa Plain Subbasin, are not addressed in this GSP. The comment is correct that the GSA has no authority to control pumping outside the subbasin

Date Received	Commentor	Comment	Response to Comments
		I eagerly wait for Section 6 to see if any measures are proposed to mitigate my concerns. I have commented on initial modeling of measure, but staff steadfastly refused substantive comments – or any at all. I expect this to change now that this email is “correctly” addressed.	Comment noted
	Wayne Haydon	Page 5, Significant and unreasonable conditions I find this phrase confusing, “…but is not specifically defined in the GSP Regulations.” I think we mean DWR does not define the specific conditions, but could use additional verbiage to make clear. I like the definition used on a slide, “A S&U provides the overall goal for the sustainability indicator in terms of conditions which must be avoided to achieve sustainability.” Although, I like the phrase, “…are a narrative description of physical conditions to be avoided…”	Text revised
		Page 6, Undesirable Result “…an undesirable result is a quantitative assessment based on minimum thresholds.” Move to here. Then the examples from the Water Code that all refer to SU makes more sense. Again, “…is not defined in the GSP Regulations.” is confusing. Frankly, I would leave out the perceived confusion between SU and UR. Recommend, “However, the description of undesirable result states that it should be a quantitative description of the combination of minimum threshold exceedances that cause significant and unreasonable effects in the Subbasin.”	Text revised
		Figure on page 16 and 17, In the explanation the description for the green and blue wells reads the same.	One is recovering, the other is recovered. The distinction is explained in the blue text box to top right
		Page 18, Define somewhere. “98th percentile shallowest supply well total depth,” and “saturated thickness factors”	98th percentile seem clear. Revised text regarding saturated thickness factors.
		Page 28, Recommend, “Lowered groundwater levels reduce the saturated thickness of the shallowsaturated aquifer…”	Comment noted. Using "shallow” as suggested may confuse readers; also affects the deep aquifer
		Page 48, “Areas to the east of the Rodgers Creek Fault appear to have slight upward movement and areas to the west of the fault appear to have slight downward movement.” I don’t see this on slides 28-29 of September 2020 meeting material. Could add text stating small vertical land surface movements may be caused by expansive soils.	Added text. Both the Rodgers Creek Fault data and the point about expansive soils being a potential contribution to subsidence are discussed/addressed in basin setting section.

Date Received	Commentor	Comment	Response to Comments
		Section 4.9.1, Recommend; "However, the risk of future inelastic land surface subsidence and consolidation of the clay-rich portions of the Subbasin's aquifer system exists if there are chronic declines of groundwater levels." Make it clear what we don't want to happen, first-land surface subsidence, second-compaction of aquifers and resulting loss of storage, and third-consolidation of aquitards.	Text revised.
		Page 53, Recommend "Continued decline of groundwater levels due to groundwater pumping within the Subbasin could trigger inelastic subsidence in areas with clay-rich aquitard materials."	Text revised
		Page 53, "The SMC for depletion of interconnected surface water is one of the more technically complex to develop and requires robust modeling tools, historical records of stream flow and groundwater levels near streams, and identification of potential impacts from streamflow depletion."	Text revised
		Page 54, Recommend "Therefore, the cause of the depletion must be evaluated to assess if such depletions are caused by groundwater pumping under the jurisdiction of the GSA."	Text revised
		Page 55, Where is the definition of and results of seepage runs? Appendix 4-10-2?	Reference deleted; not applicable to this subbasin
		Page 58, why address Seawater Intrusion? Not addressed before.	Reference deleted; not applicable to this subbasin
		Page 60, Recommended, "Based on input from the work group, the Advisory Committee and GSA Board, it was decided that MO values at RMP locations should maintain the observed average dry-season surface water depletion from pumping that occurred during the years with available observations during 2004–2018. The measurable objectives for the depletion of interconnected surface water are the average dry-season observed groundwater levels at each RMP during the years with available observations during 2004–2018." These 2 sentences repeat.	Text revised
		Page 63-67, Seems out of place. Should this be in the Section text or be part of Appendix 4-10-2?	Comment noted

SANTA ROSA PLAIN GSP COMMENTS: SECTION 5 MONITORING NETWORK			
Date Received	**Commentor**	**Comment**	**Responses to Comments**
COMMENTS RECEIVED FROM OCTOBER 1-OCTOBER 31			
10/31/2021	Coalition	The consideration of beneficial users when establishing monitoring networks is insufficient, due to lack of specific plans to increase the Representative Monitoring Points (RMPs) in the monitoring network that represent water quality conditions around DACs and domestic wells in the subbasin Figure 5-3a (Representative Monitoring Point Network for Chronic Lowering of Groundwater Levels – Shallow Aquifer System) and Figure 5-4 (Representative Monitoring Point Network for Degraded Water Quality) shows sufficient representation of DACs and drinking water users for water quality monitoring. These beneficial users may remain unprotected by the GSP without adequate monitoring and identification of data gap fails to meet SGMA's requirements for the monitoring network. **RECOMMENDATIONS** 1. Provide maps that overlay current and proposed monitoring well locations (specifying whether they are shallow or deep wells) with the locations of DACs, domestic wells, GDEs, and ISWs to clearly identify monitored areas. 2. Increase the number of RMPs in the shallow aquifer across the subbasin as needed to adequately monitor all groundwater condition indicators across the subbasin and at appropriate depths for all beneficial users. Prioritize proximity to DACs, domestic wells, and GDEs when identifying new RMPs. 3. Ensure groundwater elevation and water quality RMPs are monitoring groundwater conditions spatially and at the correct depth for all beneficial users - especially DACs, domestic wells, and GDEs.	Comment noted. The locations of DACs and areas with high concentrations of domestic wells were considered for current efforts to expand monitoring networks and will be considered when monitoring networks are expanded further during GSP implmentation. Comment noted. Monitoring networks were developed to monitor conditions throughout the Subbasin to the greatest extent possible. Data gap areas are acknowledged in the GSP. Monitoring networks will be expanded during GSP Implementation. Comment noted. A new figure (Figure 5-8) has been developed showing the proposed shallow aquifer system and interconnected surface water monitoring networks overlain with GDEs, which includes interconnected surface water. The distribution and depths of domestic wells have been incorporated into the proposed RMP networks and identification of data gaps using information from Figure 2-6, which includes the distribution of domestic wells. Comment noted. Monitoring networks will be expanded during GSP implementation Comment noted. Monitoring networks will be expanded during GSP implementation

Date Received	Commentor	Comment	Responses to Comments
10/28/2021	California Dept of Fish & Wildlife	**Planned Monitoring to Address Data Gaps: Comment:** The GSP acknowledges that more data are needed to better understand groundwater recharge and discharge mechanisms in the Subbasin, including surface water-groundwater interactions and the amount and location of groundwater extractions. In Section 5 pf te draft GSP, Figure 5-5 shows the RMP Nrtowrk for Depletion of Interconne te Surface Waters but does not include where surface water monitoring will be taking place. Also, the Norhtern and Southern portions of the subbasin seem t lack inclusion in the RMP Networks coverage. **Recommendation:** The Department recommends expanding the RMP to be better representative of the entire GSP area and establishing RMPs in the northern part of the basin (near Windsor) and in the southern basin (near Rphnert Park). This expansion of the RNP netowrk will likely help with better understanding and characterizing interconnected surface waters throughtout the GSP area.	Thank you for the recommendation. The GSA recognizes the importance of ISW monitoring. **Figure 5-5** shows the Representative Monitoring Point (RMP) Network for Depletion of Interconnected Surface Waters. Additional details are provided in Appendix 4-C, which includes Figures describing current ISW RMP locations, including shallow wells and stream gages, as well as additional high-frequency monitoring wells and planned shallow/multi-level dedicated monitoring wells adjacent to ISW (Figures 1-2). **Section 7.2.4.2** outlines future refinements for the ISW monitoring network. Specific locations for additional ISW monitoring locations will be identified following future ISW and GDE studies and information gathering.
10/31/2021	Russian Riverkeeper	p. 9-10: Section 5 contains no mention of groundwater demand and that must be identified as requires addressing in a timely manner. ....It is reasonable to take a short period of time, as is the plan in this GSP, to determine the best way to implement such monitoring be it either through amendments to PRMD's permitting process or through direct GSA action. However, the timetable for implementation of policy changes related to monitoring and data capture for groundwater demand cannot be delayed until other planned projects and managements actions are "determined to be insufficient." Demand data is a monitoring gap now and must be addressed in a timely manner. p. 10 (WQ monitoring) Thus we recommend choosing a variety of existing programs that span different program ages, different activities, and are spread across the sub-basin so as to try and reduce the impact of skewed data. We would also recommend that the GSA coordinate with various regulatory agencies on new permit programs and permit program renewals, so that the necessary types of data needs are getting incorporated into these other programs. Working with other agencies to improve programs where monitoring is already required will help lead to more consistent data and help ensure the data collected is more multi-use across the agencies.	Comment noted. Comment noted.
COMMENTS RECEIVED ON AUGUST 2021 VERSION			

Date Received	Commentor	Comment	Responses to Comments
9/9/2021	Beth Lamb	Seems comprehensive and clearly written	Comment noted
9/1/2021	Bob Anderson	Special studies conducted by the USGS within the Santa Rosa Plain Subbasin have included the collection and analysis of groundwater-quality data. Water-quality analyses have included major ions, trace elements, nutrients, stable isotopes (oxygen-18 and deuterium), tritium, the radioactive isotope of carbon (carbon-14), and the stable isotope of carbon (carbon-13). Data collected by the USGS through these studies are available on the NWIS database (USGS 2021). 2.5.2.5 U.S. Geological Survey -does this include any of the work by Flints 2019 – in another forum have seen a reference to same, supposedly done countywide – any info ??? Page 9 of 58 – check reference to Figures: The locations of the initial RMPs for each COC are shown in Section 4, and on Figures 4-8-1, 4-8-2, and 4-8-3; Figure 4-3. Baseline Groundwater Quality Arsenic 2015–2019 page 34 of 57; Figure 4-4. Baseline Groundwater Quality Nitrate 2015–2019 page 35 of 57; Figure 4-5. Baseline Groundwater Quality TDS 2015–2019 page 36 of 57	No. Changed to combined Figure 5-4
9/10/2021	David Noren	I support the analysis of groundwater elevation and water quality data gaps in Chapter 5. The representative well network should concentrate efforts of monitoring and further assessment in boundary areas, especially in areas of recharge to the Plain that are outside of the basin boundary. This issue has been raised many times in the technical advisory discussion as it pertains to the Wilson Grove Formation that borders the western side of the Santa Rosa Plain. The Wilson Grove plays a significant part in subsurface recharge to the Santa Rosa Plain and additional monitoring networks should be considered as this area that includes a significant number of private wells, wells operated by the the City of Sebastopol, agricultural wells and three large emergency backup wells on the western side of the Laguna de Santa Rosa. There is also the presence of the Sebastopol which private well monitoring conducted to date suggests represents a hydrologic barrier for shallow groundwater flow towards the Santa Rosa Plain from the Wilson Grove. The data gathering schedule for water level monitoring appears appropriate with the use of pressure transducers in many wells and other monitoring points being measured monthly and at a minimum semi-annually. A question is how will data be presented to the public and other stakeholders? It has been my experience that the dissemination of information to private well owners is key to building consensus, participation and willingness to make changes to water use and individual behavior for the collective good of managing the resource.	Comment noted Comment noted. In process of developing GW data dashboard to present data to the public
9/10/2021	Peter Martin	No comments on Chapter 5, great job covering the data gaps discussion. A few minimal comments on Section 6 are attached.	Comment noted

Date Received	Commentor	Comment	Responses to Comments
9/7/2021	Robert Pennington	Page 7 – The Representative Monitoring Point Network for Degraded Water Quality is a bit confusing. It is unclear if there are different sets of RMPs for different COCs, or if between 2015 and 2019 only some wells were sampled for various COCs. I recommend removing reference to how many wells were sampled for various COCs between 2015 and 2019 if that information is superfluous. It is also unclear if RMPs will be added automatically as new public supply wells or public water supply systems are developed.	New combined Figure 5-4 should help to clarify this
		Table 5-2 describes the gauge at Mark West Creek at Michelle Way as being monitored for Discharge. I understand that OEI developed a rating curve for this site, but that ongoing discharge measurements and rating curve calibration is not planned. I think this gauge site is very useful and recommend that discharge and rating curve calibration be conducted, especially during the dry season. This could be very useful for monitoring/validating groundwater surface water interaction in Mark West Creek.	Comment noted
		There is no stream gauge on Mark West Creek on the west side of the basin upstream from the confluence with the Laguna. I consider this a data gap and recommend pairing a stream gauge with SRP0709. Mark West Creek is arguably the stream of greatest habitat value within the SRP. Effort should be made to measure groundwater/surface water exchange along Mark West Creek. To do so, I recommend maintenance of a gauge and regular streamflow measurements through the dry season at Michelle Way or a site near SRP0707 and at a downstream gauge site near SRP0709.	Comment noted
		Figure 5-2 – Remove labels for “Mill Creek”, “Salt Creek” and “Spring Creek”, these are small tributaries and the labels clutter the map.	Comment incorproated - labels removed
COMMENTS RECEIVED ON JULY 2021 VERSION			
8/1/2021	John Rosenblum	On p.3 of the PDF (5.1 Monitoring Network Objectives): “ Monitor impacts to beneficial uses and users of groundwater” (my emphasis) should apply to the City of Sebastopol and the three mutual water companies. To me, this would mean monitoring – there are plenty of willing volunteers with historical well level data and CASGEM data - in the WGH.	Comment noted.
		On p.4 of the PDF (5.1 Monitoring Network Objectives): “Active supply wells… can be used temporarily…” covers existing data that should have been included in the GSA’s model/analysis right from the beginning of the process (i.e. as proposed long before the boundary adjustment in 2019).	Comment noted.
		On p.5 of the PDF (5.1 Monitoring Network Objectives): “… wells outside of the Subbasin, but within the contributing watershed are included in the GSP Implementation Network”. This is a false statement that is based solely on the inadequate and extremely narrow western boundary of the GSA model/analysis.	Comment noted.
		On p.9 of the PDF (5.3.1 Representative Monitoring Point Network for Chronic Lowering of Groudwter Levels – Hydrograph Comparability):	

Date Received	Commentor	Comment	Responses to Comments
		Ø Analyzing only spring levels is deceptive, since the critical reductions occur in summer/fall, with spring recovery heavily dependent on the winter precipitation. After the 3rd drought year, spring recovery has not been full, and a single point "trend" cannot reveal causation. However, the SMC has been conceived as a 3-year average to mask the potential impacts of slower cumulative reductions over time. Ø On the western boundary, the omission of wells farther to the west in Sebastopol's WGH recharge area cannot be "representative". On p.12 of the PDF (5.4.1 Spatial Distribution Data Gap Assesment): "Fig 5-6 presents the data gaps… (8 out of 16 wells) are in the Wilson Grove Highlands Groundwater Basin to the west of the Subbasin. This is appropriate… providing subsurface inflow to the Santa Rosa Plain Subbasin… the GSA will attempt to incorporate existing wells into the Boundary Network…" Ø All the words are factual, but the meaning is deceptive. The issue for the GSA members in the Sebastopol area is to monitor wells far to the west of the Boundary Network. Ø The 2016 analysis (O'Connor Environmental, Inc) of the WGH recharge area existed long before starting the GSA modelling/analysis effort, and should have - at the very least – been the hydrogeological basis for extending the boundary westwards to include the clearly defined area of unfragmented Wilson Grove Formation. On p.13-14 of the PDF (Data Quality Assesment): All the recommendations are good, but do not include expanding the GSA modelling/analysis boundary westwards into the clearly defined area of unfragmented Wilson Grove Formation. Much historical monitoring data could have already been incorporated during development of the GSP. Finally, it is unacceptable that known hydrogeological evidence was ignored by limiting the western boundary to the topographical surface watershed.	Comment noted. Comment noted. Comment noted. Comment noted. Comment noted.
7/28/2021	Bob Anderson	p. 3 This section describes the monitoring networks that are planned in the Subbasin and contributing watershed areas for implementation of the GSP and how the existing monitoring networks **described in Section 2.5,** 5.2 Description of Monitoring Networks: The monitoring networks included in this subsection are based on existing monitoring networks described generally in Subsection 2.5: p. 4: 5.2.1 Groundwater-Level Monitoring Network: The existing groundwater-level monitoring network described in Subsection 2.5	Text revised for consistency Text revised for consistency Text revised for consistency

Date Received	Commentor	Comment	Responses to Comments
		p. 6 Maybe create a chart or text box for the following (lots of important detail gets lost/hard to compare or assess): This network consists of a total of 96 wells within the contributing watershed areas, including 85 wells within the Subbasin itself. For the shallow aquifer system there are a total of 61 wells within the contributing watershed areas, including 57 wells within the Subbasin itself. Of the 61 shallow (less than 200 feet deep) wells in the GSP Implementation Network, 41 are dedicated monitoring wells (including municipal test wells), 2 are municipal supply wells, and 18 are private supply wells. For the deep aquifer system there are a total of 35 wells within the contributing watershed areas, including 28 wells within the Subbasin itself. Of the 35 deep (greater than 200 feet deep) wells in the GSP Implementation Network, 15 are dedicated monitoring wells (including municipal test wells), 9 are municipal supply wells, and 11 are private supply wells. p. 7 This sentence is within a paragraph above 5.2.3 – is an important conclusion – best highlighted: There are not currently any identified data gaps in the Groundwater Quality Monitoring Network. p. 9 Figures 5-3h, 5-3i, 5-3j, 5-3k, 5-3l, and 5-3q) are included – data is missing in Figures p. 9 Another candidate for chart or text box: This network consists of 14 wells screened within the shallow aquifer system and 12 wells screened primarily within the deep aquifer system. All of the RMP wells are located within the Subbasin. For the shallow aquifer system, 10 of the Groundwater-Level RMPs are dedicated monitoring wells (including municipal test wells) and 4 are private domestic wells. For the deep aquifer system, 7 of the groundwater-level RMPs are dedicated monitoring wells (including municipal test wells), 4 are public supply wells, and 1 is a private domestic well p. 10 In sentence below, change period after collection to ; or comma , transducers for sub-daily water-level data **collection.** 4 of the RMP wells are monitored on a monthly basis and the remaining 4 are monitored semi-annually. p. 15 Check the wording in sentence below re “should be installed” ? ? ? Will be / in the plan: Lastly, a stilling well and pressure transducer should be installed on Mark West Creek at Fulton Rd adjacent to monitoring well SRP0707 for comparison of shallow groundwater-level and surface water elevations.	Comment noted Text revised. Figures revised Comment noted Text revised Text revised
7/31/2021	Wayne Haydon	Page 4, “Construction information (Casing perforations, borehole depth, **gravel pack interval** and total well depth)” Wells GWLs reflect, and wells produce water from all aquifers exposed in well bore within the gravel pack interval.	Text revised

Date Received	Commentor	Comment	Responses to Comments
		p. 7 Define "DDW" p. 9 “This network consists of 14 wells screened within the shallow aquifer system and 12 wells screened **primarily** within the deep aquifer system.” Explain primarily. p. 10 …the InSAR dataset covers virtually the entire Subbasin with no significant data gaps.” Explain virtually. p. 14 Section 5.4.2 Assessment and Identification of Data Gaps – Surface Water Monitoring Network Explain how measure surface water and adjacent GWL at same time; install staff gauge in creeks and read when monitor? How often surface water levels monitored? Don’t recall hearing about stilling wells, page 15.	Style for document is to define once at first use in GSP and then acronym throughout. Acronyms included in front matter Table 5-3a provides information on well screening and depth. Coverage described in Section 3 and illustrated in Figure 3-14c Protocols explained in Appendix 5-A
7/22/2021	Mark Grismer	p. 6 I understand the challenge of regular semi-continuous monitoring, but semi-annual information is hardly worth the effort and should be increased to at least monthly p. 7 Re. "There are not currently any identified gaps in the GW quality monitoring network": This is hard to believe given the very limited amount of ground WQ data available both in time and across constituents. i realize that for the Title 22 and related drinking water issues the primary monitoring wells provide a basic signature, but I'd think data gaps would include rates of salinity & nitrate contamination of the shallow aquifer at the basic level and then uncertainty about contamination rates associated with more exotic herbicide, pesticide, PCPs and other pharmaceuticals...	Monitoring frequency is discussed in Section 5.4.1.2 as a data gap. The GSA's responsibilities for GW quality monitoring are discussed in Section 4. In the context of those responsibilities, there are not currently any identified data gaps that the GSA needs to address.
		p. 10 5.3.2 RMPs for degraded WQ: see previous comment about semi-annual monitoring being inadequate p. 10 5.3.3, regarding RMPs for ISW: This is a good start on shallow GW monitoring adjacent to key stream across the basin, but expect more will be required. Have placed 20 such wells along 6 mile reach of Putah Creek in Solano county on behalf of GSA there and their GWLs show markedly different behavior p. 11 Data gaps: Would be really cool to possibly crowd-source GWL info from the 1000s of domestic wells if we could offer a simple method and incentive to do so; might get folks more invested in the whole GW mgmt process as a shared endeavor. Of course, there are some who would not want to do so... p. 13 Re. monitoring frequency data gaps: Great, this addresses my previous comments p. 14 Re. IWS monitoring data gaps: Great - this will help to improve info on the ISW connection while better informing possible policies, or future plans	Monitoring frequency is discussed in Section 5.4.1.2 as a data gap. Comment noted Comment noted Comment noted Comment noted

SANTA ROSA PLAIN GSP COMMENTS: SECTION 6 PROJECTS AND MANAGEMENT ACTIONS			
Date Received	**Commentor**	**Comment**	Responses to Comments
COMMENTS RECEIVED OCTOBER 1-21, 2021			
10/25/2021	Roy Smith	The core focus should be on capture and recharge, as articulated in section 6.2.4. High-energy weather patterns may result in “normal” annual rates (30+inches) of measured precipitation, but very low levels of “functional” rainfall. “Functional” precipitation is that which is reasonably absorbed into soils and aquifers. This last storm of October 24th/25th had a great deal of measured rainfall, but a very low level of absorbed rainfall (the vast majority flowing to the Bay within a few hours). Methods such as stream flow diversion or Aquifer Storage and Recovery are ingenious, but are either disruptive or demand high energy inputs. ASR may work technically, but to take river water and filter, pump-down, pump-up, and filter again is a strategy based on massive amounts of low-cost energy; this is not the future we can expect by 2042	In regards to comments about ASR and energy use - Sonoma Water currently provides its wholesale water entirely with carbon-free energy. Such considerations will be important in the future, but continuing to provide carbon-free water will likely remain possible.
10/11/2021	Jim Mangels	I thought the project that Healdsburg did this year using residential recycled water was a clever idea to help customers with their water needs. This way it encouraged users to use recycled water on some of their plants instead of tap water as a water savings technique. This system should roll out to other cities perhaps next year to help customers with their water needs. Let's think about a similar program for a start date in Spring 2022 during the Winter of 2021.	Comment noted. Recycled water availability in Santa Rosa Plain is subject to contract demands and supply availability. Also, City of Santa Rosa has already been doing a similar project.
10/31/2021	Community Alliance with Family Farmers	Clear guidance for implementing sustainable groundwater management in land use policy, including prioritization of water for local food production. Land use is inextricably tied to groundwater use and its sustainable management. The Plan needs to address not just water use of current activities and sectors, but of the expansion of water use and water-intensive activities, such as housing development, winery development and expansion, land conversion to new vineyards, and cannabis projects. Land use should be tied to meaningful measurements and projections of long-term water availability and be considered cumulatively, for the protection of all beneficial uses. Specifically, the plan should include Accounting and permitting of water hauling guidelines for the allowance of water hauling for food production, in particular ranches, should be developed. Permitting should be streamlined and cost-effective for defined emergency drought use.	Comment noted. Appendix 3-D describes the projections of future water demands associated with future growth and land use changes that have been incorporated into the GSP. These projections will be revisted during 5-year GSP updates. Consideration of permitting guidelines for water hauling is a policy options that has been included in the initial list of policy options that will be considered and prioritized by the GSA Board within the initial years of GSP implementation.
		Regarding policy options, all policy options listed in the Santa Rosa Plain GSP ES.6.1 should be prioritized and expedited. Collaboration between the GSA Boards, local land use agencies, GSA member agencies, other Sonoma County GSAs, land use authorities and stakeholders is critical to achieving desired goals so must begin promptly. Several of these policies should be strengthened:	Comment noted.
		· Mandatory water conservation plans for all sites which use groundwater as well as new development must be required. A good example is recent legislation in Nevada which prohibits decorative turf. Plans should include mandatory conservation within jurisdictions. Plans also must create water conservation requirements for new development, as well as education for existing well owners, which has historically resulted in significant water savings.	Comment noted. Specifics regarding conservation plans for new development will be developed as part of the management action for assessing potential policy options.

Date Received	Commentor	Comment	Responses to Comments
		· Every county Use Permit must require monitoring of wells associated with the project at least bi- annually (spring and fall) with annual reporting that is compiled to produce trend lines for groundwater levels. Permit Sonoma has data for projects that required monitoring so that data must be “mined” to determine impacts. There should also be required assessment of cumulative impacts of well uses when a new well is permitted.	Comment noted. Data provided to Permit Sonoma has been incorporated into the GSP and will continue to be included in monitoring conditions during GSP implementation.
		· Well permits must be required to show explicit proof of sustained availability and to demonstrate NO cumulative impacts	Specifics regarding well permitting recomendations will be developed as part of the management action for assessing potential policy options. As the GSA does not have authority over well permitting, any policy options related to well permitting would be recommendations to the County, which has authorities regarding well permitting.
		· Well construction and permitting must have requirements, not just recommendations, that comply with GSA goals.	As the GSA does not have authority over well permitting, any policy options related to well permitting would be recommendations to the County, which has authorities regarding well permitting.
		· Accounting and permitting of water hauling guidelines for the allowance of water hauling for food production, in particular ranches, should be developed. Permitting should be streamlined and cost-effective for defined emergency drought use.	Specifics regarding water hauling recomendations will be developed as part of the management action for assessing potential policy options.
		Sonoma County’s Chapter of CAFF requests to be included in these upcoming GSP activities: stakeholder input on the fee schedule to be levied on agricultural users; Farm Plan assessments; and any additional agricultural stakeholder meetings. Although agricultural stakeholder meetings have previously been held in the planning process, CAFF-- which represents the many small farms and ranches which supply our farmers markets, grocery stores, CSA boxes and some restaurants-- was noted in the focused working group.	Comment noted. CAFF representatives will be contacted to participate in the listed GSP activities.
10-31-2021	Coalition	The consideration of beneficial users when developing projects and management actions is insufficient, due to the failure to completely identify benefits or impacts of identified projects and management actions, including water quality impacts, to key beneficial users of groundwater such as GDEs, aquatic habitats, surface water users, DACs, and drinking water users. Therefore, potential project and management actions may not protect these beneficial users. Groundwater sustainability under SGMA is defined not just by sustainable yield, but by the avoidance of undesirable results for all beneficial users.	Comment noted. A major focus of the initial five years of implementation will be to gather information and data in many key areas to improve the understanding of potential impacts associated with groundwater conditions to sensitive beneficial users, primarily shallower domestic well users (including DACs) and GDEs. This information and data will inform consideration of future refinements to SMC and appropriate response actions (projects and management actions) protective of these sensitive beneficial users.

Date Received	Commentor	Comment	Responses to Comments
		The management actions described in Section 6.4.3 (Assessment of Potential Policy Options for GSA Consideration) and Section 6.4.1 (Coordination of Farm Plans with GSP Implementation) describe improvement to water quality through sediment runoff mitigation and water quality sampling. The GSP specifically describes projects with benefits to GDEs, including the Stormwater Capture and Recharge Project described in Section 6.2.2. However, the plan fails to identify or describe projects or management action with explicit benefits to DACs or drinking water users, including a domestic well mitigation program.	Projects and management actions with explicit benefits to DACs and drinking water users include any of the projects that are anticipated to raise groundwater levels. These primarily include water-use efficiency and alternate water source projects and aquifer storage and recovery.
		RECOMMENDATIONS: 1. For DACs and domestic well owners, include a drinking water well impact mitigation program to proactively monitor and protect drinking water wells through GSP implementation. Refer to Attachment B for specific recommendations on how to implement a drinking water well mitigation program. 2. For DACs and domestic well owners, include a discussion of whether potential impacts to water quality from projects and management actions could occur and how the GSA plans to mitigate such impacts. 3. Recharge ponds, reservoirs, and facilities for managed stormwater recharge can be designed as multiple-benefit projects to include elements that act functionally as wetlands and provide a benefit for wildlife and aquatic species. For guidance on how to integrate multi-benefit recharge projects into your GSP, refer to the “Multi-Benefit Recharge Project Methodology Guidance Document”. 4. Develop management actions that incorporate climate and water delivery uncertainties to address future water demand and prevent future undesirable results.	While a drinking water well impact mitigation program is not considered to be needed in the near-term based on current conditions, consideration of a well impact mitigation program has been added to the list of potential policy options for the GSA to consider in Section 6.4.3 of the GSP. The following language was added to the description of projects that could potentially impact water quality: "Future GSP implementation projects or actions that require their own site-specific monitoring network would take into consideration any localized COCs and regulatory requirements to avoid potential impacts to beneficial users, including domestic well users and DACs." Comment noted. This was performed for GSP. See Section 6 and Appendix 3-G
10/28/2021	California Dept of Fish & Wildlife	**Comment:** Management actions should include specifics on how and on what timeline adverse impacts will be reversed, if observed. The GSP should specify adaptive management strategies to account for ‘lag’ impacts wherein groundwater responses to changes in management regimes are delayed due to aquifer characteristics. Projects and management actions should seek to maximize multiple-benefit solutions, including habitat improvements.	Comment noted. Adaptive management strategies are being developed through the assessment of potential policy options, including demand management measures, that could be utilized to address potential "lag" in projects and management action implementation and results.

Date Received	Commentor	Comment	Responses to Comments
		Recommendation: The Department encourages the GSA to consider implementing recharge projects that facilitate floodplain inundation. These projects offer multiple benefits including downstream flood attenuation, groundwater recharge, and ecosystem restoration. Managed floodplain inundation can recharge floodplain aquifers, which in turn slowly release stored water back to the stream during summer months. These projects also reconnect the stream channel with floodplain habitat, which can benefit juvenile salmonids by creating off-channel habitat characterized by slow water velocities, ample cover in the form of submerged vegetation, and high food availability. Additionally, these types of multi-benefit projects likely have more diverse grant funding opportunities that can lower their cost as compared to traditional off-channel recharge projects.	Comment noted. Flood-MAR is one of the projects included in the Projects and Management Actions section.
10/31/2021	Russian Riverkeeper	p. 4: Real time well-metering must be put in place to get a better understanding of this use so that the GSA can make informed decisions about recharge needs and establish use models to mitigate potential for future draw-down. Wells must be sampled regularly so as to help grow the water data library and ensure improved modeling can occur over time. As is, the GSP appears to omit this gap in water use and potential impact of leaving that factor unknown. p. 5: The GSP currently puts a heavy emphasis on surface water supply augmentation as opposed to demand reduction. ...Due to the increasing issues surrounding future supply replenishment, it is vital that demand reductions be fully considered and given a higher priority throughout this GSP. To date, groundwater pumping has been allowed to continue unimpeded such that the GSA does not know how much water is pumped, how that amount changes across the seasons, or where all the wells are even located. Without any of this data it is impossible for the GSP to tackle the demand side of things and it is a necessary and vital component to achieving lasting sustainability. Monitoring and reporting data to obtain this key information must be given priority—in both time and funding. p. 6: Demand reduction methods that need to be considered include the feasibility of land fallowing, increased urban conservation, pumping restrictions through local government policies, fees for groundwater pumping, and irrigation reductions. The timeline for implementing such measures may not need to be immediate, but the GSP needs to properly allocate time and funding to determine the feasibility and beneficial impacts of demand reduction in order for the Santa Rosa Basin to actually obtain long-term sustainability. Without demand reduction and knowledge of how groundwater is used, the Santa Rosa Basin cannot obtain long-term sustainability.	Well metering/monitoring is included in the list of policy options to be considered in collaboration with the County and other agencies. The Group 1 project consists solely of conservation by rural domestic and agricultural groundwater users. The 'surface water supply' projects are of lower priority. Regarding the monitoring of well data, well metering/monitoring is included in the list of policy options to be considered in collaboration with the County and other agencies. The GSA does not have land use authority, so it cannot require prescription of land fallowing. Regarding the other recommendations in the comment, some of them fall under the Group 1 projects and policy options described in Section 6 and 7.

Date Received	Commentor	Comment	Responses to Comments
		p. 8 Groundwater extraction has the potential to harm endangered salmon instream habitat, and must be given more attention in the form of specific details on addressing data gaps, timeline on obtaining necessary data, and funding allocated to closing this data gap. The GSP must give further detail in how this interchange is going to be impacted by climate change and present a timeline for closing any existing data gaps. Funding for collecting this information must be made a priority and a detailed timeline should be provided. Details also need to be provided on mitigation measures and what conditions will trigger those measures, especially during dry periods with severely reduced precipitation—for instance pumping restrictions and moratoriums on new groundwater wells near interconnected surface waters when certain thresholds are exceeded in extended dry periods. There also needs to be analysis and consideration for how groundwater pumping may impact water rights in light of this surface- groundwater interchange.	Interconnected surface waters are identified as a key data-gap in Sections 4 and 7. Section 7 details how the data-gaps will be addressed.
		p. 10 Thus we recommend that policy changes be implemented within the first year of GSP implementation such that a standardized well-metering program is put in place so the GSA has access to real-time continuous pumping and water demand data. Similar to surface water management practices, an accurate and current use baseline must be established to gauge project responses. To provide public assurance in health and safety of aquifer, this data should also be made publicly available.	Well metering/monitoring is included in the list of policy options to be considered in collaboration with the County and other agencies.
		p. 10 In order to ensure best available information about impacts to beneficial users reliant on shallow groundwater, we also recommend the GSA improve local information about the location and condition of both active and abandoned groundwater wells. Local investigations would improve accuracy regarding well location, condition and water quality. We are also concerned that because well abandonment data is largely unavailable, there is potential for migration of surface contaminants to groundwater from improperly closed wells. We recommend the GSA coordinate with other local agencies to identify inactive and abandoned wells to ensure that they have been properly retired	Comment noted. Improving information on the locations and depths of existing water wells and volumes and timing of groundwater extraction is identified as a study that will be initiated during implementation of the GSP. Gaining information on inactive and abandoned wells will also be incorporated into this study.
		P. 11: p. 11: Voluntary measures are not sufficient and the GSA must fully utilize its powers to impose stronger actions on groundwater users for both agricultural and domestic users. If the GSA would prefer, they could implement an incentive program for the initial few years to try and increase conservation based habits.	Comment noted
		p. 12: Recharge projects that do not occur on government land must be done equitably. Ownership of any waters used for recharge and deposited into the aquifer directly below private property must be clear before projects are implemented. Recharge projects done at community costs must benefit the entire community, and must not be allowed to become a solely private supply for participating property owners. Recharge projects must happen throughout the sub-basin so that all well users can benefit. Prioritizing areas with more domestic well concentrations is also recommended as they are for human health needs and are more likely to be negatively impacted by excessive agricultural pumping.	Comment noted.

Date Received	Commentor	Comment	Responses to Comments
		p. 12: The determination that there will be an excess 5000 AFY in the Russian River more than 90% of the time to help facilitate recharge projects needs reconsidered. It is highly unlikely that there will be an additional 5000 AFY 90% of the time that can be diverted for recharge projects. The GSP notes that water availability will be updated during the early stages of implementation, but there is no timeline provided on what early means. A fundamental reliance on water that may not be there in future years is not setting the sub-basin up to achieve its goals p. 12: An alternative method of obtaining this 5000 AFY goal with more reliability would be through the use and injection of recycled water for recharge projects. However, the GSP chose not to include recycled water projects in their modeling scenarios due to cost limitations and other unidentified uncertainties. The GSP also appears to have only focused on the use of recycled water to augment supply for irrigation with smaller scale recharge happening as a by-product. However, recycled water has additional potential that should be considered for the region in terms of direct injection. p. 12: The GSA should utilize its power to purchase lands to restore them to a natural floodplain where multiple benefits including downstream flood attenuation and ecosystem restoration can occur. The GSA can also use its powers to create special management areas where lands of environmental significance or ideal recharge conditions have been identified so that pumping impacts in those areas is further reduced and recharge efforts are more robust.	The availability of Russian River water for groundwater recharge is estimated to occur 90% of the time during winter and spring months. These estimates are based on the best available data as of 2013. These values will be refined, based on newly available climate forecasts, during GSP implementation. Due to contractual obligations there is limited recycled water available for the foreseeable future in the plan area. The GSA likely does not have the capacity to purchase lands, nor does the GSA does have have authority over land use practices. Additionally downstream flood attenuation is not under the scope of the GSA.
10/31/2021	Bob Anderson	Appendix 6A:	

Date Received	Commentor	Comment	Responses to Comments
		Page 4 of 12 – three different but same explanations pages 4, 6, 11 The Group 1 scenario was implemented by changing the following model inputs: Rural Domestic Pumping: For Group 1, rural domestic pumping reductions were simulated by rescaling specified pumping rates for rural domestic wells in the MODFLOW WEL file. From WY 2025 until the end of the simulation, the rural domestic pumping rates were reduced by 20% from the baseline scenario. Vineyard Consumptive Use: For Group 1, vineyard consumptive use reductions were simulated by reducing crop coefficients (Kc) by 10% during the growing season from what was used for the baseline scenario, beginning in water year 2025. Crop coefficients in the PVIHM were specified as part of the inputs to the MODFLOW-OWHM Farm Process (FMP) Page 6 of 54 2.1.1 Group 1 The Group 1 project scenario builds upon the future baseline scenario by adding reductions in water use for rural domestic water users and reductions in vineyard consumptive use. The Group 1 scenario simulates the impacts of a 20% reduction in all rural domestic use and a 10% reduction in consumptive use for all vineyards, both beginning in 2025. Page 11 of 54 2.2 Implementation of Projects in Model In each PMA scenario, each type of project is implemented in the model in the same way. Crop Consumptive Use: Crop consumptive use reductions are simulated by reducing crop coefficients (Kc) by 10% during the growing season, beginning in water year 2025. This has the effect of lowering the potential evapotranspiration. As a result, the AG package calculates lower groundwater pumping to meet crop demand. Rural Domestic Pumping: Rural domestic pumping reductions are simulated by rescaling specified pumping rates. From WY 2025 until the end of the simulation, the rural domestic pumping rates are reduced by 20%. These declines in water use are assumed to occur via reductions in outdoor water use only. Because indoor water does not decline, septic return flows are assumed to remain the same as those of the Projected Baseline simulation.	Comment noted.
		Page 13 of 54 – ag use cited in both boxes under Group 1	Table now fixed.
		page 14 of 54 – here Group 1 appears to start well past start date in the text	Results shown on graph on graph reflect the time lag of the impact of the projects on groundwater conditions. This is not unexpected or indicative of a modeling error.

Date Received	Commentor	Comment	Responses to Comments
		Page 143 of 152- to repeat a point made in earlier comments: “not able to follow this logic”. For the WY 2021 to 2040 period, rural domestic pumpage is similar to the current period. Rural domestic pumpage is projected to increase, however. Section 6: (See slide for reference) In each of the slide decks for the Community meetings for the Public Review Draft, the text for ‘future policy options’ was presented using wording not contained in the three documents. The slides did variations instead and acknowledged the fact that the County of Sonoma is the entity that reviews well permits. The GSP wording should be changed and track the slides.	text clarified Clarifications of text has been added to Section 6.
COMMENTS RECEIVED ON AUGUST 2021 VERSION			
8/27/2021	National Marine Fisheries Service	· We suspect that groundwater recharge projects are likely to be an important action implemented as part of the effort to achieve groundwater sustainability in Sonoma County. NMFS encourages the GSA to consider implementing recharge projects that facilitate floodplain inundation, offering multiple benefits including downstream flood attenuation, groundwater recharge, and ecosystem restoration. · Managed floodplain inundation can recharge floodplain aquifers, which in turn slowly release stored water back to the stream during summer months. These projects also reconnect the stream channel with floodplain habitat, which can benefit juvenile salmon, steelhead, and sturgeon by creating off-channel habitat characterized by slow water velocities, ample cover in the form of submerged vegetation, and high food availability. · As an added bonus, these types of multi-benefit projects likely have more diverse grant funding streams that can lower their cost as compared to traditional off-channel recharge projects. NMFS stands ready to work with any GSA interested in designing and implementing floodplain recharge projects.	Comment noted. The stormwater capture and recharge projects could include multi-benefit floodplain inundation. Comment noted. The stormwater capture and recharge projects could include multi-benefit floodplain inundation. Comment noted. The stormwater capture and recharge projects could include multi-benefit floodplain inundation.
8/19/2021	John Rosenblum	6.1.2 Evaluation of Projects Through Scenario Modeling: For the purposes of conducting initial evaluation of projects for this GSP, staff assembled conceptual projects and actions that are likely to be initiated within the first five years of implementation into two general categories. **COMMENT: “Implementation” means after the 20-year grace period?** 1. Those that have identified potential funding sources or are voluntary or incentive-based and are lower-cost (Gro	Implementation overall begins in WY 2021 - the actual project start dates depend on complexity of projects. Mandatory State orders are outside the purview of the GSP.

Date Received	Commentor	Comment	Responses to Comments
		2. New or significantly expanded projects/actions that would require further studies and planning for implementation (Group 2 and 3 projects). Both Group 2 and Group 3 projects represent managed aquifer recharge projects that aim to maintain or raise groundwater levels and improve summer and fall streamflows. The Group 2 projects represent stormwater capture and recharge projects that could specifically benefit streamflows within the Subbasin and help comply with the SMC for depletion of interconnected surface water. Group 3 projects represent aquifer storage and recovery (ASR) projects that can reduce municipal pumping of native groundwater, help address many sustainability indicators, primarily the chronic lowering of groundwater levels, and build drought-resiliency. **COMMENT: As storms increase in severity and flooding is more frequent?**	As storms increase in severity, there will be greater opportunites for stormwater recharge projects.
		• Groundwater Levels: In the baseline scenario, groundwater levels in the shallow and deep aquifers remain above minimum thresholds for the first 20-year period. Groundwater levels generally fall below minimum thresholds in the last 11 years of the 50-year projected baseline water budget, primarily in RMPs in the deeper aquifer, leading to undesirable results. The cumulative projects decrease minimum threshold exceedances from 66 to 18 and remove all occurrences of undesirable results. CMMENT: 20-year grace period – "threshold" defined by depth and by the number of wells impacted. 18 is still undesirable. Removing undesirable results assumes recovery	Undesirable results are defined by number of different RMP's with minimum threshold exceedances. Such exceedances are not met here, so no undesirable results occur, as simulated.
		Groundwater storage: Groundwater in storage under a baseline scenario without projects is estimated to decline by an average of 200 AFY between 2021-2040 and 1,400 AFY over the entire 50-year projection period that includes a simulated extreme 20-year drought between 2050 and 2070. Cumulative projects are simulated to reduce the average decline by 400 AFY between 2021 -2040 and 300 AFY over the entire 50-year projection. **COMMENT Unclear: 200x19=3,800AF loss up to 2040; 1,400x50=70,000 AF loss up to 2071. "by" = "to"?**	Text corrected
		Project scenarios help limit groundwater declines during the latter portion of the projected period (affected by the major drought). Although minimum threshold exceedances are not completely avoided during this more extreme dry period under these scenarios, the exceedances during severe droughts are not representative of undesirable results unless groundwater levels do not recover during subsequent wetter time periods. **COMMENT: "Get out of jail"?** **The major issue is whether there will be recovery between "severe droughts"**	Undesirable results are defined by number of different RMP's with minimum threshold exceedances. Such exceedances are not met here, so no undesirable results occur, as simulated.
		Considering current uncertainties due to modeling and project information, these project scenarios show reasonable efforts towards reaching sustainability in the Subbasin to meet GSP requirements. Additional data collection and project conceptualization during early phases of GSP implementation will help refine these scenarios and allow for consideration of additional scenarios.	Comment noted.
8/23/2021	Bob Anderson	Page 4 of 14 - key sentence but ends up it is stuck in middle, "remove all" that's big: The cumulative projects decrease minimum threshold exceedances from 66 to 18 and remove all occurrences of undesirable results.	Comment noted.

Date Received	Commentor	Comment	Responses to Comments
		Page 4 of 14 – 200 AFY decline is then simulated to reduce the average decline by 400 AFY? Groundwater storage: Groundwater in storage under a baseline scenario without projects is estimated to decline by an average of 200 AFY between 2021-2040 and 1,400 AFY over the entire 50-year projection period that includes a simulated extreme 20-year drought between 2050 and 2070. Cumulative projects are simulated to reduce the average decline by 400 AFY between 2021 -2040 and 300 AFY over the entire 50-year projection	Text revised
		Page 4 of 14 – hardly very convincing: Considering current uncertainties due to modeling and project information, these project scenarios show reasonable efforts towards reaching sustainability in the Subbasin to meet GSP requirements.	Text revised
		Page 5 of 14 – PMAs? Used in text here but not defined: To prevent potential undesirable results and to achieve measurable objectives, PMAs are planned as part of GSP implementation. As described above, a portfolio of PMAs has been developed and evaluated with the goal of addressing relevant sustainability indicators. The GSA plans to immediately begin implementation of selected PMAs	Text revised
		Page 5 of 14 – typo add Section before 354.44 as done on page 2 of 14 “This section satisfies Sections 354.42 and 354.44 of the SGMA regulations” The following sections provide descriptions of the Group 1, 2 and 3 projects, including information required by 354.44.	Correction made
		Page 7 of 14 – cited - needs reference: Russian River Regional Storm Water Resource Plan	Reference added
		Page 8 of 14: In order to continue and/or expand implementation of Group 2 projects, the GSA coordinate with other project proponents who may be pursing multi-benefit projects, consider providing additional funding in future years and will seek opportunities for grant funding.	
		P. 12: Only one of these “A total of $30,000 is included in the initial five-year budget”:	
		6.3.2 Assessment of Additional Recycled Water Opportunities The use of recycled water for agricultural and landscape irrigation within the Subbasin has provided substantial benefits to groundwater conditions. During the current water budget period, it is estimated that approximately 10,000 AFY of recycled water is delivered within the Subbasin for agricultural and landscape irrigation, significantly reducing the need for use of groundwater and other potable water supplies.	Revised
		6.3.3 Assessment of Potential Policy Options for GSA Consideration The use of recycled water for agricultural and landscape irrigation within the Subbasin has provided substantial benefits to groundwater conditions. During the current water budget period, it is estimated that approximately 10,000 AFY of recycled water is delivered within the Subbasin for agricultural and landscape irrigation, significantly reducing the need for use of groundwater and other potable water supplies	Revised

Date Received	Commentor	Comment	Responses to Comments
		Page 13 of 14 – hidden but attention worthy: Under a curtailment scenario, the GSA would need to determine the amount of water that affected pumpers could take sustainably, and the pumpers would be required to reduce their groundwater extraction to that allocation. Under such a scenario, all pumpers subject to allocations and restriction would be required to be metered. In the event of a need to restrict pumping, pumping restrictions could also be placed on new wells.	Text revised
		Page 14 of 14: restrictions on permits in specific areas could be considered if additional localized pumping could drive one or more sustainability indicators below the minimum threshold. (URs?) not very limiting (or very limiting potentially) - "limit": Limits could also be placed on which aquifers could be drawn from if there was a potential adverse impact in a particular zone that might affect certain sustainability indicators.	Text revised
		COMMENTS ON APPENDIX 6-A: SIMULATION OF PROJECTS AND MANAGEMENT ACTIONS	
		Page 10 of 53 – typo. In the Group 2 scenario, MAR of stormwater is simulated by adding water to the soil zone. The stormwater is recharged to the soil zone by adding it to the external water source option in the in the Precipitation and Runoff Module System component of GSFLOW.	Noted and addressed
		Page 11 of 53 – typo in Rural domestic pumping box Group 1 column	Noted and addressed
		Page 12 of 53: Despite the injection of 940 AFY in Group 3, there is only minor benefit to groundwater storage in this scenario. This occurs because **a number fluxes offset** the increased inflows	Noted and addressed
		Page 4 of 53: The Group 1 scenario simulates the impacts of a 20% reduction in all rural domestic use and a 10% reduction in consumptive use for all vineyards, both beginning in 2025.	
		Page 12 of 53 – here the Group 1 projects appear to be added in ~2034, AND on Page 17 of 19 – here it is 2023: The project implementation schedule includes the development and implementation of Group 1, Group 2 and Group 3 projects, as described in Section 6. After a short planning period, it is assumed that Group 1 project implementation will begin in 2023.	One cannot directly observe beginning of implementation through these graphs. There are lags between the projects and their impacts.
		Page 13 of 53 – isn't it more important to show impact 2021-2040? 2021 – 2070	noted
		Page 19 of 53 – typo – need period after period. Maybe not after Table 7 (or drop name of the Table): These values are summarized in Table 7. Summary of Waterlevel exceedances by depth and period	comment is unclear
		Page 22 of 53 – check the colors – bit confusing between shallow & deep and WY type	Noted and addressed
8/23/2021	Mark Grismer	Well done. See comments below.	Comment noted
		p. 2, para 2: These seem to be reasonable caveats, but may want to add the possibility of water use restrictions. I realize that these are under GSA and SWRCB, but thought they should at least be mentioned up front as a means of possible GW mgmt., as they are considered in the final section 6.3.4.	Discussed under management actions
		p. 3, Evaluation of Projects through Scenario Modeling: OK, this sort of addresses my previous comment	Comment noted

Date Received	Commentor	Comment	Responses to Comments
		p. 4, last para: Considering current uncertainties due to modeling and project information, these project scenarios show reasonable efforts towards reaching sustainability in the Subbasin to meet GSP requirements. COMMENT: 'Progress' instead of 'efforts' p. 5: 6.2.1.1 Objectives, Circumstances and Timetable for Implementation ~~Objectives for implementing the~~ Group 1 projects are to help achieve measurable objectives and avoid undesirable results for the chronic lowering of groundwater levels sustainability indicator. p. 7: 6.2.2.1 Objectives, Circumstances and Timetable for Implementation ~~Objectives for implementing~~ the Group 2 projects are primarily anticipated to help achieve measurable objectives and avoid undesirable results for the depletion of interconnected surface water sustainability indicator. p. 9: 6.2.3.1 Objectives, Circumstances and Timetable for Implementation ~~Objectives for implementing~~ ASR projects are to help achieve measurable objectives and avoid undesirable results for the chronic lowering of groundwater levels sustainability indicator.	Text revised Text revised Text revised Text revised
9/10/2021	Peter Martin	P.3. "and they have not yet all been sufficiently developed or agreed upon by stakeholders." Not sure if this note is necessary.	Text revised
9/10/2021	David Noren	Section 6 contemplates future actions that can be implemented as projects and management actions. The GSP should include a commitment of building incentives for all project levels. This should include agricultural property owners that are both users of recycled water in the Santa Rosa Plain and also represent the land base in which larger scale projects can be implemented. The connection of the GSA efforts to Farm Plans and other regulatory and non-regulatory projects is a smart strategy for combining efforts and goals. The GSA should also consider working with the update of the Sonoma County General Plan Resource Elements to require metering for all new wells and include provisions that allow for a standardized approach for data gathering for private and agricultural wells. The cost and construction of these items can be lessened if installed during the installation of new wells. Minimal standardized water quality testing may also be considered as a reporting requirement for newly installed wells to establish baseline conditions.	Comment noted Text revised to refer to general plan specifically under policy options discussion.
9/7/2021	Robert Pennington	Page 8 – Estimated cost for Group 1 and 2 Projects seem low. Additional seasonal use of Russian River Water in place of groundwater use could be cost effective. I recommend a future assessment (similar to the proposed evaluation of recycled water) be specified. In particular, Cal American may have significant potential to use more Russian River water during the winter months.	Cost estimates are based on costs of prior studies. Costs will continue to be refined through upcoming fee study budget. Suggestion can be addressed in future GSP implementation period.

SANTA ROSA PLAIN GSP COMMENTS: SECTION 7 IMPLEMENTATION PLAN			
Date Received	**Commentor**	**Comment**	Responses to Comments
10/1/2021	Tim Carlson	I am curious about how the proposed fees will be applied? as a residential non-commercial well owner I am solely responsible for the maintenance, repairs and energy costs related to pumping water out of the ground for our home use. Current costs to drill a new well are over $75 per foot. There are no avenues for financial aid for us. Supervisor Rabbit told me he is proposing that the fees be spread across all water consumers in Petaluma but he could not speak for the Santa Rosa plain proposal. Is the going to be the case in the Santa Rosa plain plan as well?	Consideration of fees for funding GSP implementation will be addressed through a fee study that was initiated in 2021 and will continue through mid-2022.
10/22/2021	Jennifer LaPorta	I skimmed thru Sect 7, thinking I'd get the info I was seeking but did not. I don't have time to read thru this entire report. Please just tell me: what fee are you thinking of charging rural residential well owners like me? Also, are you planning to put meters on our wells? if so, I sure as hell hope they won't be wireless devices, because we are electro-magnetic sensitive here. NO wireless devices!!!	Consideration of fees for funding GSP implementation will be addressed through a fee study that was initiated in 2021 and will continue through mid-2022. Well metering is a policy option that will be studied during implementation of the GSP. Wells used for single-family homes and landscaping (no commercial use and that pump less than 1,785 gallons a day) are considered deminimis users by SGMA and can't be required to meter their wells.
10/25/2021	Roy Smith	The greatest scale of recharge at the lowest cost can be gained by engaging all land owners with parcels of 1+ acres. Simple and durable land alterations can be employed to slow and sink available precipitation. However, land owners are not currently incentivized in this direction as the cost of implementation is born directly by them individually, but the benefit is conveyed to the public at large through the “commons”. It may be best to pursue County-wide groundwater recharge through education, credit schemes, easily replicable designs, and funding or grant schemes coordinated through other local, State, and Federal agencies.	Comment noted
10/29/2021	Sebastian Bertsch	Section 7.3.1: This section should highlight some takeaways from the initial fee study completed in 2019. It should also highlight SGMA guidelines which state domestic de-minimis users are subject to less oversite, and cannot be forced to meter. It should also summarize the feedback from public comment that stated a clear opinion that fee structures should respect the distinction in SGMA to place more of the oversite and cost burden on commercial users of groundwater.	Comment acknowledged. The fee study that is currently underway will include consideration of the intial fee study and will also address issues regarding fair-share distribution of the fee.
10/31/2021	Community Alliance with Family Farmers	We believe the following components should be included in every Groundwater Sustainability Plan (GSP):	

Date Received	Commentor	Comment	Responses to Comments
		Clear guidance for implementing sustainable groundwater management in land use policy, including prioritization of water for local food production. Land use is inextricably tied to groundwater use and its sustainable management. The Plan needs to address not just water use of current activities and sectors, but of the expansion of water use and water-intensive activities, such as housing development, winery development and expansion, land conversion to new vineyards, and cannabis projects. Land use should be tied to meaningful measurements and projections of long-term water availability and be considered cumulatively, for the protection of all beneficial uses. Specifically, the Plan should include: 1. Coordination of water management and land use planning. In line with the objective of "close coordination and collaboration with other entities and regulatory agencies that have a stake or role in groundwater management in the Subbasin," the GSP should provide clear mandates and guidelines to be incorporated by Permit Sonoma into Use Permits, and by other jurisdictions into their land use policies and permits. Permitting must not be in conflict with the GSP and should support achieving sustainability goals. 2. Prioritization of water for food farming (fruit, vegetables, herbs, and livestock). As supply chain disruptions continue due to climate change and other impacts, we will increasingly rely on local food production, especially during emergencies. Given that local food security is likely to become an even more significant issue over the 50-year planning horizon, the Plan must distinguish agricultural water use by food vs. non-food crops. It may be argued that wine grapes are essential to our economy, but they can be dry farmed—whereas most fruits and vegetables, and all livestock, require water. According to annual Crop Reports there has been a glut of wine grapes on the market since 2018, yet more vineyards continue to be developed across the county. CAFF has been involved with providing resources and training on irrigation efficiency and assisting with vineyard transition to dry farming.	Additional text had been added to Section 7.2.2 regarding coordination with land use agencies. Recommendations on policy options will addressed through the policy options management action. Comment noted.

Date Received	Commentor	Comment	Responses to Comments
		3. Preparation for large-scale, emergency groundwater reliance/ usage. Staff have explained that “long-term sustainability” and “adaptive management” are central to groundwater sustainability planning, and that short-term shortages and drought are not intended to be included in this phase. Assuming that groundwater levels begin to significantly decline, it will be possible to create and implement necessary management actions in the future. We find this approach to be highly irresponsible and inadequate. Plans should contain proactive preparation for worst-case scenario groundwater extraction, such as if sudden or drastic shortages and/or disruptions to surface water supplies were to occur. Local agencies and municipalities should use this information to create or update contingency plans, which should also include equitable prioritization of uses. “Worst case scenario” planning provides necessary time to change course in advance of irreversible decline or degradation. We are concerned that the climate model showing “normal” and wetter than normal conditions for 2025-2050 could lead to severe water shortages - the opposite of sustainability.	Comment noted. Many of the implementation activities and planned projects and actions will build resiliency for groundwater users within the Subbasin.
		Sonoma County’s Chapter of CAFF requests to be included in these upcoming GSP activities: stakeholder input on the fee schedule to be levied on agricultural users; Farm Plan assessments; and any additional agricultural stakeholder meetings. Although agricultural stakeholder meetings have previously been held in the planning process, CAFF-- which represents the many small farms and ranches which supply our farmers markets, grocery stores, CSA boxes and some restaurants-- was not included in the focused working group.	Comment noted. CAFF representatives will be contacted to participate in the listed GSP activities.
10/31/2021	Santa Rosa Metro Chamber of Commerce	A reliable supply of water is a critical resource that underlies our ability to live in an area on a long-term basis. The droughts we have experienced in California over the past decade – and the especially severe drought of the past two years – have emphasized that our water infrastructure and water management practices must be up to the job of ensuring that our residents and businesses have at least a minimally adequate supply of water even during the worst droughts.	Comment noted
		We have been following the development of the Groundwater Sustainability Plan by the Agency over the past few years pursuant California’s 2014 Sustainable Groundwater Management Act. The draft Plan follows the requirements of the Act and its preparation by the Agency and will ensure that the region will retain control over the management of its groundwater rather than having the state manage it for us. The Plan lays out the information basis, the decision-making criteria, and the process and timetable for developing actions in future years to achieve sustainability while allowing for flexibility in selecting specific policies and actions to accommodate future basin conditions.	Comment noted

Date Received	Commentor	Comment	Responses to Comments
		We support the adoption of the Plan by the Agency and we look forward to working with the Agency as it assesses and prioritizes policy options to achieve the goals of the Plan in the first year following its approval by the State.	Comment noted
10/31/2021	Russian Riverkeeper	p. 13: Every single policy option presented on the initial list for GSA consideration must be implemented in a timely manner. A timely study to determine the best route for impleentation is reasonable, but these policy options cannot be delayed beyond this determination…There is no excuse to not getting these policy options into place within the next 2 to 4 years, and there is no justifiable reason to delay any ofthese actions until other "projects and management actions are determined to be insufficient."	Comment noted
		p. 15: The SRBGSA must provide concrete triggers and timelines for projects within its control, including pumping restrictions, to demonstrate a likelihood of avoiding undesirable results and meeting the ustainability goal as required under SGMA. Management actions that will have an immediate, quantifiable impact, including limiting new wells and taking the necessary steps to initiate pumping restrictions must be included in the GSP because they provide certainty and therefore are reasonably likely to help meet sustainability goals for the region as SGMA requires.	Comment noted. Initial timelines for projects are included in the schedule and will be refined as information is developed during GSP implementation. Triggers and timelines for specific management actions considered and prioritized by the GSA Board will be developed as part of the planned policy options study.
		p. 15: Establishing an ongoing fee program and pay rate for groundwater will be essential to ensuring that the GSA will be able to fulfill its SGMA duties. One thing to consider during this transition to a fee program and/or pay rate would be the use of monetary incentives (e.g. rate discounts) in exchange for real-time well-metering and reporting, fallowing of land for recharge, conservation achievements, or other multi-benefit action done to help the GSA achieve long-term sustainability in the sub-basin.	Comment noted

Date Received	Commentor	Comment	Responses to Comments
10/28/2021	California Dept of Fish & Wildlife	**Comment:** Management actions should include specifics on how and on what timeline adverse impacts will be reversed, if observed. The GSP should specify adaptive management strategies to account for 'lag' impacts wherein groundwater responses to changes in management regimes are delayed due to aquifer characteristics. Projects and management actions should seek to maximize multiple-benefit solutions, including habitat improvements. **Recommendation:** The Department encourages the GSA to consider implementing recharge projects that facilitate floodplain inundation. These projects offer multiple benefits including downstream flood attenuation, groundwater recharge, and ecosystem restoration. Managed floodplain inundation can recharge floodplain aquifers, which in turn slowly release stored water back to the stream during summer months. These projects also reconnect the stream channel with floodplain habitat, which can benefit juvenile salmonids by creating off-channel habitat characterized by slow water velocities, ample cover in the form of submerged vegetation, and high food availability. Additionally, these types of multi-benefit projects likely have more diverse grant funding opportunities that can lower their cost as compared to traditional off-channel recharge projects.	Thank you for the recommendation. The GSA recognizes the importance of implementing recharge projects, and has outlined Projects and Management Actions to facilitate stormwater capture and recharge (Section 6.2.2).
COMMENTS RECEIVED ON AUGUST 2021 VERSION			
9/1/2021	Bob Anderson	page 3 of 19 – typo ten not nine. As described in Section 1.3.2, the nine member agencies currently plan to continue operating under the Joint Powers Authority Page 4 of 19 – typo – no Section 7.1.4. 7.2.3 Annual Monitoring, Data Evaluation and Reporting Monitoring of the five applicable sustainability indicators is a key component for successful implementation of the GSP. Most monitoring relies on existing monitoring programs, some of which will be enhanced or expanded as described in Section 5 and Section 7.1.4.	Corrected. Corrected.
9/9/2021	Beth Lamb	Table 7-3: Total Estimated Five-Year Implementation Costs No 5 year total 5.7 Millionish?	Added total costs
8/23/2021	Mark Grismer	P. 6: "Interconnection of streams to the shallow aquifer system, including seasonal variability and how groundwater pumping and surface water diversions ~~can~~ affect streamflow: COMMENT: and stream recharge to shallow and deeper groundwater systems P. 7: ~~well owners~~ Cooperators instead	Noted - text corrected Noted - text corrected

Date Received	Commentor	Comment	Responses to Comments
		p. 7: This information will be integrated with available groundwater level data and information to assess the relationship between groundwater levels and GDEs. Conduct field visits as-needed to verify findings from remote sensing assessment. COMMENT: and consider the addition of shallow (<50' bgs) groundwater monitoring wells adjacent to streams of within relevant riparian areas as identified above. P. 8: Seen note above: The phrase may better fit here: "and consider the addition of shallow (<50' bgs) groundwater monitoring wells adjacent to streams of within relevant riparian areas as identified above." at this location: Additionally, it is assumed that remote sensing assessments of vegetation health will continue to be performed and reported at key intervals such as the 5-year GSP updates. p. 11: A sustainability evaluation ~~will contain~~ a description of current groundwater conditions for each applicable sustainability indicator and ~~will include~~ a discussion of overall sustainability in the Subbasin. COMMENT: "that contains" and "and includes." p. 12, first para: Not sure why these are all in the future tense as that was already indicated at the top. Would simply clarify as edited in first paragraph above	Comment noted Comment noted Noted - text corrected Noted - text corrected
9/10/2021	Peter Martin	I won't review section 7 further. I read through quickly late last month and the presentation of budget, reporting, funding etc. to the AC didn't cause me any concern. I'm done reviewing – sorry for waiting till the last minute.	Comment noted
9/10/2021	David Noren	In Section 7 - I strongly support the communication and outreach process. Private well owners should have many opportunities and forums to get information and updates that are geared to lay people that distills information in a format that is not a long technical report. The reporting to the public stakeholders and private well owners should be conducted annually along with the reporting to DWR. Consider using all elements of social networking, news media and other forums to communicate goals and outcomes. Annual town hall type meetings would also be of benefit. This ties into the process of fees to provide a service of information to well owners and stakeholders of data, management actions, outcomes, fiscal and budget requirements and statement and update of goals to a community that to this point has not been regulated or had a requirement for fees for the use of water.	Comment noted
9/10/2021	Wayne Haydon	P. 7, second point: Interconnected surface water and GDE studies: "The GDE Pulse web app developed by the Nature Conservancy provides data on long term temporal trends of vegetation metrics, including." Need to finish sentence.	Noted - text corrected

Date Received	Commentor	Comment	Responses to Comments
		p. 15: Should we name the consultant hires in August 2021, and discuss/summarize the previous Raftelis fee study, and how the new study will differ from the Raftelis study?	Noted - section corrected
9/7/2021	Robert Pennington	p. 24: 24. I do not see discussion of the GSA reviewing and responding to: a. General Plan amendments; b. Other local policies related to groundwater resources; c. Other public and private projects subject to CEQA . Review and response to GP amendments is required per 65352.5(d). The report on anticipated effect could take a fair bit of GSA staff time, and it may be worth noting as a future task or administrative task. If the GSA wants to take an active role in reviewing private projects and requesting specific conditions of approval or mitigation measures, this would also take staff time and resources. Per the current CEQA checklist includes the following "Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?" Lead agencies will look to the GSA staff to help answer this question, and determine suitable mitigation measures. Mitigation fees could also be a source of funding for GSA supported projects.	Coments noted - added language regarding the points made
9/12/2021	John Rosenblum	The imprecise use of the terms "implementation" and "implementation period" means that it could take 20 years (SGMA REQUIRED PLAN ELEMENTS 10727.2. (b) (1) Measurable objectives, as well as interim milestones in increments of five years, to achieve the sustainability goal in the basin within 20 years of the implementation of the plan) Section 7-A refers to GSP updates in 5 years' time, but the detailed descriptions reveal only that the modelers will consider inclusion of new information that they deem relevant. Time is not on our side to slowly develop formal communication procedures, install separate fully-automated monitoring wells, and run a few test scenarios. The GSP overall lacks any sense of urgency, while there are ample volunteers who would gladly provide access to wells and data about their well – particularly in the West County/Wilson Grove Highlands. Without purposeful outreach to volunteers, and incorporation of existing data and evaluations (e.g. O'Connor 2016) – and given the County's lack of enforcement of reporting from Ag wells and surface diversions – it is unlikely that new groundwater information/data will be available to update the hydraulic model.	Implementation will begin in 2022. Comment noted. Outreach to obtain information volunteered by groundwater users is a key component of the implementation plan.

Date Received	Commentor	Comment	Responses to Comments
		As a specific example of proposed considerations is “Perform sensitivity analyses of existing model to determine sensitivity of boundary flux”. From a scientific perspective, of course this should be done (one of the gaps pointed by O’Connor 2016). However, such an effort requires verification with groundwater data from the Wilson Grove Highlands – especially since the downstream Laguna impacts will be negligible compared to all the other factors (already pointed out in the older USGS reports). So, rather than invest effort in creative statistical analyses of spotty historical data, there would be far less uncertainty from obtaining data outside the existing model boundary – at the very least from the points utilized by O’Connor for the 2009-2014 trend. In lay terms, relying on boundary flux is like waiting until a crisis occurs before telling us that it is confirmed by the model – instead of tracking developing trends in time to make plans.	Evaluation of the basin boundary's representation in the model will include available data and information from areas outside of the Subbasin, including data from O'Connor, 2016.

Date Received	Commentor	Comment	Responses to Comments
		For climate scenarios, there is the same lack of urgency (e.g. “As part of the five year update to the GSP, the latest available projected climate science and data will be reviewed and considered for incorporation into the scenarios for the Water Year 2026 through 2072 projected period.”). In addition, the phrasing still means that there would be no change in modeling the RCP 8.5 pathway to extinction. Again, as with the hydraulic model, the implication is to wait until the formal IPCC reports tell us all is lost (diplomatic managers of COP prevent dire warnings from becoming policy). Although consideration of the “Paris Accords” (RCP 2.6) requires an effort far beyond the State’s mandates, it would demonstrate that sustainable groundwater planning is not only a local, or even a California issue. A comparison with RCP 8.5 would show how much smaller the groundwater impact might be if achievable climate-adaptation did become the guideline for sustainability planning (calling extinction “adaptive” is in much line with George Orwell’s predictions from the 1930’s).	The selection of the RCP 8.5 scenario of the HadGEM2-ES model was based on extensive input from the three stakeholder advisory committees (ACs) and Board of Directors (Boards). These discussions occurred as part of an all-basin workshop and several AC and Board meetings. In addition to the technical information provided in Appendix 3-E, additional information included a summary of input from climate scientists regarding RCP 4.5 vs. 8.5 and a comparison of model output from both futures for the Santa Rosa Plain. The input from climate scientists was mixed with some indicating RCP 4.5 was more realistic while others indicated RCP 8.5 (known as business as usual – worst case) would be more appropriate. Many also indicated that the selection of an RCP emission scenario is really not a technical or scientific decision but rather a philosophical view of whether global mitigation efforts would reduce emissions closer to a RCP 4.5 or whether the “business as usual” RCP 8.5 would occur. In regards to the modeled comparison between the RCP 4.5 and 8.5, the results (attached to this document) clearly show the RCP 8.5 provides a worse case for groundwater storage, groundwater pumping, groundwater discharge to streams, and groundwater recharge. This is because the RCP 8.5 exhibits increased temperatures (increase evapotranspiration and pumping) and increased variability of precipitation by severe droughts (stress tests) relative to the RCP 4.5 scenario. Based on the above process, the majorities of each of the stakeholder Advisory Committees and the GSA Boards decided to use the more conservative (worst case) RCP 8.5. There were some who favored the RCP 4.5 and at least one who felt the RCP 2.6 (Paris Accords) should be used. Again, this review will be re-evaluated in the next plan update.

Date Received	Commentor	Comment	Responses to Comments
		The 3 mutual water companies in Sebastopol recommend explicit commitments in Section 7 to include: a. Expand the hydraulic model to include all the unfragmented Wilson Grove Formation before the next 5-year GSP update (incorporating O'Connor's 2016 data and methodology) b. Immediate outreach to well-owners to volunteer access and/or groundwater levels, including monthly measurements with measuring tape and/or pressure transducers (possibly purchased and maintained by Sonoma Water) c. Complete enforcement of Ag well and surface diversion reporting by the County Ag Commissioner and PRMD (the boards of the GSA, Sonoma Water, and County are largely overlapping) d. Add RCP 2.6 ("Paris Accords") to the climate modeling	a.) The need and appropriateness of expanding the model boundary will be evaluated within the first few years of GSP implementation, as described in Appendix 7-a. b) Outreach for a voluntary groundwater level measurement program is included 7.2.4.2 c) The GSA does not have authority to enforce reporting of surface water diversions. d) Additional climate scenarios will be evaluated and considered for future model scenarios during GSP updates.

Appendix 1-B
Resolution of the Board of Directors of the Santa Rosa Plain Groundwater Sustainability Agency Forming a Groundwater Sustainability Agency for the Santa Rosa Plain and Joint Exercise of Powers Agreement

Santa Rosa Plain Groundwater Sustainability Agency

Resolution No. SRP-17-001

RESOLUTION OF THE BOARD OF DIRECTORS OF THE SANTA ROSA PLAIN GROUNDWATER SUSTAINABILITY AGENCY
FORMING A GROUNDWATER SUSTAINABILITY AGENCY FOR THE SANTA ROSA PLAIN

WHEREAS, the comprehensive groundwater legislation collectively enacted and referred to as the "Sustainable Groundwater Management Act" at California Water Code Section 10720 *et seq.* ("SGMA") initially became effective on January 1, 2015; and

WHEREAS, the stated purpose of SGMA, as set forth in California Water Code section 10720.1, is to provide for the sustainable management of groundwater basins at a local level by providing local groundwater agencies with the authority and technical and financial assistance necessary to sustainably manage groundwater; and

WHEREAS, SGMA requires the designation of Groundwater Sustainability Agencies ("GSAs") for the purpose of achieving groundwater sustainability through the adoption and implementation of Groundwater Sustainability Plans ("GSPs") for all medium and high priority basins as designated by the California Department of Water Resources; and

WHEREAS, SGMA authorizes a combination of local agencies, as defined by SGMA, to form a GSA by entering into a joint powers agreement; and

WHEREAS, the Santa Rosa Plain Groundwater Sustainability Agency ("Agency") was formed pursuant to a Joint Exercise of Powers Agreement entered into by the City of Cotati, City of Rohnert Park, City of Santa Rosa, County of Sonoma, Gold Ridge Resource Conservation District, Sonoma County Water Agency, Sonoma Resource Conservation District, and Town of Windsor, each of which is a local agency as defined by SGMA, within the Santa Rosa Plain ("Basin") which is designated basin number 1-55.01 in Department of Water Resources Bulletin No. 118 and which is designated as a medium priority basin; and

WHEREAS, the Agency's jurisdiction covers the full geographical area of the Basin; and

WHEREAS, the purpose of the Agency is to serve as the GSA for the Santa Rosa Plain to comply with SGMA; and

WHEREAS, SGMA requires that the Basin have a designated GSA by no later than June 30, 2017; and

WHEREAS, the Agency is committed to sustainable management of the Basin's groundwater resources; and

WHEREAS, notice of a public hearing on the Agency's decision to become a GSA for the Basin has been published in in the Santa Rosa Press Democrat (on May 17, 24, and 28, 2017) as required by Water Code section 10723 and Government Code section 6066; and

WHEREAS, on this day, the Agency held a public hearing to receive public comment and consider the decision to become the GSA for the Basin in accordance with Water Code section 10723; and

WHEREAS, it would be in the best interest of the Basin for the Agency to become the GSA for the Basin, and to begin the process of preparing a GSP for the Basin; and

WHEREAS, the Agency's process to develop the GSP for the Basin will include stakeholder outreach and input and will provide multiple opportunities for public involvement;

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the SANTA ROSA PLAIN GROUNDWATER SUSTAINABILITY AGENCY, as follows:

1. All recitals are true and correct.

2. The Agency hereby elects to be the GSA for the Basin.

3. The Agency's Interim Administrator is directed file the GSA Formation Notification, along with required supporting documentation, with the California Department of Water Resources, no later than June 30, 2017.

PASSED, APPROVED AND ADOPTED this day, June 1, 2017, by the following vote:

DIRECTORS:

Dutton: _____ Harvey: _____ Hopkins: _____ Millan: _____ Ryan: _____

Schwedhelm: _____ Stafford: _____ Zane: _____

VOTES:

Ayes: ____ Noes: ____ Absent: ____ Abstain: ____

By:

Chairperson Santa Rosa Plain Groundwater Sustainability Agency	Brittany Jensen Date: Interim Administrator

WHEREAS, notice of a public hearing on the Agency's decision to become a GSA for the Basin has been published in in the Santa Rosa Press Democrat (on May 17, 24, and 28, 2017) as required by Water Code section 10723 and Government Code section 6066; and

WHEREAS, on this day, the Agency held a public hearing to receive public comment and consider the decision to become the GSA for the Basin in accordance with Water Code section 10723; and

WHEREAS, it would be in the best interest of the Basin for the Agency to become the GSA for the Basin, and to begin the process of preparing a GSP for the Basin; and

WHEREAS, the Agency's process to develop the GSP for the Basin will include stakeholder outreach and input and will provide multiple opportunities for public involvement;

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the SANTA ROSA PLAIN GROUNDWATER SUSTAINABILITY AGENCY, as follows:

1. All recitals are true and correct.

2. The Agency hereby elects to be the GSA for the Basin.

3. The Agency's Interim Administrator is directed file the GSA Formation Notification, along with required supporting documentation, with the California Department of Water Resources, no later than June 30, 2017.

PASSED, APPROVED AND ADOPTED this day, June 1, 2017, by the following vote:

DIRECTORS:

Dutton: _____ Harvey: _____ Hopkins: _____ Millan: _____ Ryan: _____

Schwedhelm: _____ Stafford: _____ Zane: _____

VOTES:

Ayes: 8 Noes: 0 Absent: 0 Abstain: 0

By:

Chairperson Santa Rosa Plain Groundwater Sustainability Agency	Brittany Jensen Date: Interim Administrator

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JOINT EXERCISE OF POWERS AGREEMENT

creating the

SANTA ROSA PLAIN GROUNDWATER SUSTAINABILITY AGENCY

Table of Contents

SANTA ROSA PLAIN GROUNDWATER SUSTAINABILITY AGENCY JOINT EXERCISE OF POWERS AGREEMENT

THIS JOINT EXERCISE OF POWERS AGREEMENT ("Agreement") forming the Santa Rosa Plain Groundwater Sustainability Agency ("**Agency**") is made and entered into as of May 25th, 2017 ("**Effective Date**"), by and among the public agencies listed on the attached Exhibit "A" (collectively "**Members**" and individually "**Member**") for the purpose of forming a Groundwater Sustainability Agency ("**GSA**") and achieving groundwater sustainability in the Santa Rosa Plain Groundwater Basin.

RECITALS

WHEREAS, the comprehensive groundwater legislation collectively enacted and referred to as the "Sustainable Groundwater Management Act" at California Water Code Section 10720 *et. seq.* (**"SGMA"**) initially became effective on January 1, 2015.

WHEREAS, the stated purpose of SGMA, as set forth in California Water Code section 10720.1, is to provide for the sustainable management of groundwater basins at a local level by providing local groundwater agencies with the authority and technical and financial assistance necessary to sustainably manage groundwater.

WHEREAS, SGMA requires the designation of Groundwater Sustainability Agencies ("**GSAs"**) for the purpose of achieving groundwater sustainability through the adoption and implementation of Groundwater Sustainability Plans ("**GSPs**") or an alternative plan for all medium and high priority basins as designated by the California Department of Water Resources.

WHEREAS, each Member is a local agency, as defined by SGMA, within the Santa Rosa Plain Groundwater Subbasin ("**Basin**") which is designated basin number 1-55.01 in Department of Water Resources Bulletin No. 118 and which is designated as a medium priority basin.

WHEREAS, pursuant to Section 10723 of the California Water Code, SGMA authorizes a water corporation regulated by the Public Utilities Commission ("PUC") or a mutual water company to participate in a GSA through agreement.

WHEREAS, certain PUC-regulated (PUCR) and mutual water companies (MWC) within the Basin have entered into a Memorandum of Understanding for the purpose of selecting a common representative to serve as a member of the GSA Board ("MWC/PUCR MOU").

WHEREAS, SGMA requires that the Basin have a designated GSA by no later than June 30, 2017 and an adopted GSP by no later than January 31, 2022.

WHEREAS, SGMA authorizes a combination of local agencies to form a GSA by entering into a joint powers agreement.

WHEREAS, the Members are authorized by the Joint Exercise of Powers Act (Chapter 5 of Division 7 of Title 1 of the California Government Code) ("**Act**") to create the Agency for the

purpose of jointly exercising those powers granted by the Act and any additional powers which are common among them.

WHEREAS, the Members, individually and collectively, have the goal of cost effective sustainable groundwater management that considers the interests and concerns of all beneficial uses and users of groundwater.

WHEREAS, in order to promote efficiency and sharing of resources, the Members, individually and collectively, encourage coordination between GSAs in Sonoma County.

WHEREAS, the Members hereby enter into this Agreement to establish this Joint Powers Authority to form a GSA and undertake the management of groundwater resources pursuant to SGMA.

AGREEMENT TERMS

NOW THEREFORE, in consideration of the matters recited and the mutual promises, covenants, and conditions set forth in this Agreement, the Members hereby agree as follows:

Article I: Definitions

Section 1.01 – Definitions.

As used in this Agreement, unless the context requires otherwise, the meaning of the terms hereinafter set forth shall be as follows:

(a) "Act" shall mean the Joint Exercise of Powers Act, set forth in Chapter 5 of Division 7 of Title 1 of the California Government Code, sections 6500, *et seq*., including any amendments thereto.

(b) "Administrator" shall mean the person or entity appointed by the Board pursuant to Section 9.01.01 to manage the operation of the Agency.

(c) "Agency" shall mean the Santa Rosa Plain Groundwater Sustainability Agency, which is a separate entity created by this Agreement pursuant to the provisions of California Government Code sections 6500 *et seq*.

(d) "Agreement" means this Santa Rosa Plain Groundwater Sustainability Agency Joint Exercise of Powers Agreement.

(e) "Basin" shall mean the Santa Rosa Plain Groundwater Subbasin which is designated basin number 1-55.01 in Department of Water Resources' Bulletin No. 118 and as its boundaries may be modified from time to time through the procedures described in California Water Code section 10722.2 or by the Department of Water Resources under its separate authority.

(f) "Board of Directors" or "Board" shall mean the governing body of the Agency as

established by Section 6.01 of this Agreement.

(g) "Bylaws" shall mean the bylaws adopted by the Board of Directors pursuant to Section 9.05 of this Agreement to govern the day-to-day operations of the Agency.

(h) "Director" and "Alternate Director" shall mean a Director or Alternate Director appointed by a Member pursuant to Section 6.02 of this Agreement.

(i) "Ex Officio Member" shall mean an entity invited to participate in the Agency pursuant to Section 5.02 of this Agreement.

(j) "Fiscal Year" shall mean July 1st through June 30th pursuant to Section 10.03 of this Agreement.

(k) "Groundwater Sustainability Agency" or "GSA" shall have the meaning set forth in California Water Code section 10721(j).

(l) "Groundwater Sustainability Plan" or "GSP" shall have the meaning set forth in California Water Code section 10721(k).

(m) "Local Agency" or "Local Agencies" shall have the meaning set forth in California Water Code Section 10721(n).

(n) "Member" or "Members" shall mean the local agencies listed in the attached Exhibit "A" that have executed this Agreement, including any new Members that may subsequently join this Agency with the authorization of the Board, pursuant to Section 5.02 of this Agreement.

(o) "MWC/PUCR Director" shall mean the person selected to represent the Basin area mutual water companies and PUC regulated utilities on the GSA Board pursuant to the MWC/PUCR MOU.

(p) "Plan Manager" shall mean the person appointed by the Board to oversee the preparation and implementation of the GSP and who has been delegated management authority for submitting the GSP, GSP amendments, annual reports, and five-year assessments and serving as the point of contact between the Agency and the Department of Water Resources. The Plan Manager shall be a professional engineer, professional geologist or certified hydrogeologist, or someone who has demonstrated experience and knowledge in the foregoing areas as determined by the Board.

(q) "Sustainable Groundwater Management Act" or "SGMA" shall mean the comprehensive groundwater legislation collectively enacted and referred to as the "Sustainable Groundwater Management Act" ("SGMA") as codified in California Water Code Sections 10720 *et seq.* and as may be amended in the future.

Article II: Agency Creation

Section 2.01 – Creation of the Agency.

There is hereby created a joint powers agency known as the Santa Rosa Plain Groundwater Sustainability Agency ("Agency"). The Agency shall be, to the extent provided by law, a public entity separate from the Members of this Agreement.

Section 2.02 – Purpose of the Agency.

The purpose of this Agreement, and the creation of the Agency, is to provide for the joint exercise of powers common to the Members, to specifically include powers granted by SGMA, for the purpose of cooperatively carrying out the requirements of SGMA, including, but not limited to, serving as the GSA for the Basin.

Article III: Term

Section 3.01 – Term.

This Agreement shall become operative on the Effective Date, provided that at least two of the Members listed in Exhibit A have executed this Agreement by said date. If an eligible agency listed in Exhibit A has not executed this Agreement by May 12, 2017 it will lose its right to join through execution of this Agreement and its membership will be subject to the process for inclusion of new Members set forth in Section 5.02, provided, however, that if an eligible agency is diligently pursuing approval of this Agreement from its governing board and has obtained approval not later than May 26, 2017, then it shall be allowed to join without adherence to Section 5.02.

This Agreement shall remain in effect until terminated by the unanimous written consent of all then active Members or until there are less than two Members remaining in the Agency; provided, however, that this Agreement shall remain in effect during the term of any contractual obligation or indebtedness of the Agency that was previously approved by the Board.

Article IV: Powers

Section 4.01 – Powers.

The Agency shall possess the ability to exercise those powers specifically granted by the Act and SGMA. Additionally, the Agency shall possess the ability to exercise the common powers of its Members related to the purposes of the Agency, including, but not limited to, the following:

4.1.1 To designate itself the GSA for the Basin pursuant to SGMA.

4.1.2 To adopt rules, regulations, policies, bylaws and procedures governing the operation of the Agency and the adoption and implementation of the GSP.

4.1.3 To develop, adopt and implement a GSP for the Basin pursuant to

SGMA.

4.1.4 To adopt ordinances within the Basin consistent with the purpose of the Agency as necessary to implement the GSP and otherwise meet the requirements of SGMA.

4.1.5 To employ agents and employees.

4.1.6 To obtain legal, financial, accounting, technical, engineering, and other services needed to carry out the purposes of this Agreement.

4.1.7 To conduct studies, collect and monitor all data related and beneficial to the development, adoption and implementation of the GSP for the Basin.

4.1.8 To perform periodic reviews of the GSP including submittal of annual reports.

4.1.9 To require the registration and monitoring of wells within the Basin.

4.1.10 To issue revenue bonds or other appropriate public or private debt and incur debts, liabilities or obligations.

4.1.11 To exercise the powers permitted under Government Code section 6504 or any successor statute.

4.1.12 To levy taxes, assessments, charges and fees as provided in SGMA or otherwise provided by law.

4.1.13 To regulate and monitor groundwater extractions within the Basin as permitted by SGMA, provided that this Agreement does not extend to a Member's operation of its system to distribute water once extracted or otherwise obtained, unless and to the extent required by other laws now in existence or as may otherwise be adopted.

4.1.14 To establish and administer projects and programs for the benefit of the Basin.

4.1.15 To cooperate, act in conjunction and contract with the United States, the State of California, or any agency thereof, counties, municipalities, special districts, groundwater sustainability agencies, public and private corporations of any kind (including without limitation, PUC regulated utilities and mutual water companies), and individuals, or any of them, for any and all purposes necessary or convenient for the full exercise of the powers of the Agency.

4.1.16 To accumulate operating and reserve funds and invest the same as allowed by law for the purposes of the Agency and to invest funds pursuant to California Government Code section 6509.5 or other applicable State Law.

4.1.17 To apply for and accept grants, contributions, donations and loans under any federal, state or local programs for assistance in developing or implementing any of its projects or programs for the purposes of the Agency.

4.1.18 To acquire by negotiation, lease, purchase, construct, hold, manage, maintain, operate and dispose of any buildings, property, water rights, works or improvements within and without the respective boundaries of the Members necessary to accomplish the purposes described herein.

4.1.19 To sue or be sued in its own name.

4.1.20 Any additional powers conferred under SGMA or the Act or under applicable law, insofar as such powers are needed to accomplish the purposes of SGMA, including all powers granted to the Agency under Article 4 of the Act which are in addition to the common powers of the Members, including the power to issue bonds or otherwise incur debts, liabilities or obligations to the extent authorized by the Act or any other applicable provision of law and to pledge any property or revenues of the rights thereto as security for such bonds and other indebtedness.

4.1.21 Any power necessary or incidental to the foregoing powers in the manner and according to the procedures provided for under the law applicable to the Members to this Agreement and to perform all other acts necessary or proper to fully carry out the purposes of this Agreement.

Section 4.02 – Exercise of Powers.

In accordance with California Government Code section 6509, the foregoing powers shall be subject to the restrictions upon the manner of exercising such powers pertaining to the County of Sonoma.

Section 4.03 – Water Rights and Consideration of all Beneficial Uses and Users of Groundwater in the Basin.

As set forth in California Water Code section 10723.2, and any future amendments to SGMA, the GSA shall consider the interests of all beneficial uses and users of groundwater in the Basin, as well as those responsible for implementing the GSP. Additionally, as set forth in California Water Code section 10720.5(a), and any future amendments to SGMA, any GSP adopted pursuant to this Agreement shall be consistent with Section 2 of Article X of the California Constitution and nothing in this Agreement modifies the rights or priorities to use or store groundwater consistent with Section 2 of Article X of the California Constitution, with the exception that no extraction of groundwater between January 1, 2015 and the date the GSP is adopted may be used as evidence of, or to establish or defend against, any claim of prescription. Likewise, as set forth in California Water Code section 10720.5(b), and any future amendments to SGMA, nothing in this Agreement or any GSP adopted pursuant to this Agreement determines or alters surface water rights or groundwater rights under common law or any provision of law that determines or grants surface water rights.

Section 4.04 – Preservation of Powers.

Nothing set forth in this Agreement is intended to abrogate the powers of any Member, independent of the Agency, including but not limited to police power, as applicable. The adopted GSP shall not authorize any water supply augmentation to the Basin with groundwater extracted from another groundwater basin within the jurisdiction of a Member without the express consent of that Member.

Section 4.05 – Coordination between Basins.

In order to maintain consistency and the efficient use of resources, to the extent feasible, the Agency shall endeavor to coordinate between and among the other Sonoma County GSAs for administration, matters involving public communication and outreach, and for developing frameworks to support groundwater management, which may include agreement to certain areas of coordination, provided that the Agency retain its own authority and that such recommendations are ratified by the Board. The Agency may clarify and acknowledge coordination among the other GSAs through a document or agreement if deemed appropriate.

Section 4.06 – Agreement with MWC/ PUCRs.

The Agency will enter into a single participation agreement with the Basin area mutual water companies and PUC-regulated entities located within the Basin who are parties to the MWC/PUCR MOU to allow participation in the GSA as authorized by SGMA. Such participation agreement shall allow the selection of one representative, as well as an alternate, pursuant to the MWC/PUCR MOU to serve as the MWC/PUCR Director and Alternate Director on the GSA Board. The participation agreement with the MWC/PUCRs shall contain the same provisions regarding termination, suspension of voting rights, and continuing obligations upon withdrawal or termination as those that pertain to the Members pursuant to Sections 11.06 and 11.07.

Section 4.07 – Public Meeting for Periodic Review of Agreement.

To ensure that the Agency's governance structure addresses the interests and concerns of those affected by its activities, the Board shall conduct a public meeting at the following milestones to review the terms and conditions of this Agreement and discuss whether any amendments to this Agreement are necessary or advisable:

- Upon completion of an initial fee study
- Within three years of submittal of the GSP to DWR
- At least once every ten years after adoption of the GSP

At such public meeting the Administrator and Agency Counsel shall make a report to the Board recommending any amendments to the Agreement, and if directed by the Board shall draft proposed amendments to this Agreement for consideration by the governing boards of each Member. This section shall not preclude the Members from making amendments of this Agreement at other times as deemed necessary or appropriate by the Members, in accordance with Section 12.02 of this Agreement.

Article V: Membership

Section 5.01 – Members.

The Members of the Agency shall be the local agencies listed on the attached Exhibit "A", so long as their Membership has not been withdrawn or terminated pursuant to the provisions of Article XI of this Agreement.

Section 5.02 – Ex Officio Members.

An entity that is pursuing formation of a local public agency that is qualified to join the Agency under the provisions of SGMA and the Act, may submit to the Agency documentation of its formation process. Such documentation shall include:

5.02.01 For an entity going through Sonoma County Local Agency Formation Commission (Sonoma LAFCO):

- All documentation submitted to the Sonoma LAFCO, including:
  - Complete Application/Petition Packet
  - Plan for Services, which shall include its five-year plan, budget and funding information, and staffing plan, and which shall demonstrate that the entity will meet the SGMA definition of local public agency and provide an analysis of how the entity will support SGMA implementation
  - Map, showing boundaries and parcels
- Documentation of Sonoma LAFCO's approval or conditional approval of entity's application/petition

Upon receipt of the above documentation, the entity will be invited to join the Board as an Ex Officio Member, with no voting rights. Such Ex Officio participation will cease upon any of the following:

- If LAFCO granted conditional approval, failure to meet any of the required conditions
- Failure to conduct the required elections for formation within timeframe required by LAFCO
- Failure of required elections for formation to pass
- Failure to complete formation process within three years of becoming Ex Officio Member

5.02.02 For an entity going through a special legislative process outside Sonoma LAFCO:

- Final text of the enacted and enrolled bill which shall demonstrate that the entity will meet the SGMA definition of local public agency and include provisions regarding how the entity will support SGMA implementation
- Documentation that the bill has been chaptered by the Secretary of State

Upon receipt of the above documentation, the entity will be invited to join the Board as an Ex Officio Member, with no voting rights. Such Ex Officio participation will cease upon any of the following:

- Failure to conduct required elections, if any, for formation within the timeframe specified by the legislation, if any. If no timeframe is specified, within one year of the effective date of the legislation.
- Failure of required elections, if any, for formation to pass.
- Failure to satisfy other requirements, if any, specified in the legislation for formation within the timeframe specified by the legislation, if any. If no timeframe is specified, within one year of the effective date of the legislation.

Section 5.03 – New Members.

Upon submittal of an application for membership, new Members shall be admitted to the Agency so long as: 1) the new Member is located or has jurisdictional boundaries within the Basin; 2) the new Member is a local public agency or another entity authorized by SGMA that is qualified to join the Agency under the provisions of SGMA and the Act; and 3) the new Member agrees to the terms of this Agreement, including applicable financial obligations, which may be determined based at no more than an equal share of the unreimbursed Funding Commitments of the other Members pursuant to Section 10.02 or as established pursuant to Section 10.07.

Once an application is accepted by the Board of Directors, this Agreement is executed by an authorized representative of the new Member, and the new Member satisfies any applicable financial obligation of the new Member, the attached Exhibit "A" shall be amended to reflect the new Member, and such action by the Board shall not be subject to the requirements of Section 12.02.

Article VI: Directors and Officers

Section 6.01 – Board of Directors.

The Agency shall be governed and administered by a Board of Directors ("Board") which is hereby established and which shall be composed of one voting seat per Member and one voting seat for the MWC/PUCR MOU Representative. The governing board shall be known as the "Board of Directors of the Santa Rosa Plain Groundwater Sustainability Agency." All voting power shall reside in the Board.

Section 6.02 – Directors and Alternates.

Directors and Alternates shall be appointed as follows:

6.02.01 Members: Each Member shall appoint one Director and one Alternate Director to the Board. The Alternate Director shall serve and assume the rights and duties of the Director when the Director is unable to attend a Board meeting. The Directors and Alternate Directors shall be elected or appointed officials of their governing bodies. Directors and Alternate Directors shall serve at the pleasure of the Member appointing them and they may be removed at any time, with or without cause, in the sole discretion of their

respective Members. Each Director and Alternate Director shall hold office until their successor is selected by their Member and the Agency has been notified of the succession. In the event that a Director or Alternate Director loses their position as an official of their Member's governing body, that Director position shall become vacant and that Member shall appoint a new Director.

6.02.02 MWC/PUCR: The MWC/PUCR MOU Director, and an Alternate Director, shall be selected in accordance with the MWC/IOU MOU and any applicable provisions of the participation agreement.

Section 6.02.03 Ex Officio Member: For any Ex Officio Member established pursuant to Section 5.02, the Ex Officio Member shall appoint one representative who shall reside within the proposed geographic boundaries of the Ex Officio Member. The Ex Officio Member may participate in Board discussions but shall have no voting rights.

Section 6.03 – Officers of the Board.

Officers of the Agency's Board shall consist of a Chairperson and Vice-Chairperson. The Chairperson shall preside at all meetings of the Board, while the Vice-Chairperson shall perform the duties of the Chairperson in the absence or disability of the Chairperson. The Chairperson and Vice-Chairperson shall exercise and perform such other powers and duties as may be assigned by the Board.

Section 6.04 – Appointment of Officers of the Board.

The Board shall annually elect the Officers of the Board from the Directors. Officers of the Board shall hold office for a term of two years commencing on July 1 of every other calendar year and they may serve for multiple consecutive terms. Officers of the Board may be removed and replaced at any time, with or without cause by a Board vote. In the event that an Officer of the Board loses their position as a Director, that Officer of the Board position shall become vacant and Board shall elect a new Officer from existing Board members to serve the remaining Officer term.

Article VII: Board Meetings and Actions.

Section 7.01 – Initial Meeting.

The initial meeting of the Board, which shall be held for purpose of meeting the requirements of California Water Code Section 10723, including decision of the Agency to serve as the GSA for the Basin, shall be held at a location overlying the Basin on or before June 20, 2017.

Section 7.02 – Regular Meeting Schedule.

The Board shall establish by resolution, bylaws, or other procedure a regular meeting time and place at the initial meeting of the Board. The Board may vote to change the regular meeting time and place provided that the new location remains at a place overlying the Basin.

Section 7.03 – Conduct of Board Meetings.

Meetings of the Board of Directors shall be noticed, held, and conducted in accordance with the provisions of The Brown Act (California Government Code sections 54950, *et seq*.).

Section 7.04 – Quorum.

A quorum of the Board shall consist of a majority of the Directors.

Section 7.05 – Voting.

Each Director shall have one vote. A majority vote of the Directors is needed for the adoption of any action, except those which require a supermajority three-fourths vote or a unanimous vote.

Section 7.06 – Supermajority Voting Requirement.

A supermajority vote is three-fourths of the Directors. Items that require a supermajority vote to pass consist of the following, which may be amended from time to time by the Board by a supermajority vote, or as may otherwise be required by this Agreement (See Sections 9.03, 11.06 and 12.02.02) or by law:

- Bylaws adoption, modification or alteration
- GSP adoption, modification or alteration
- Removal of Advisory Committee members
- Modifications to the composition and number of Advisory Committee members
- Adoption of assessments, charges and fees
- Adoption of regulations and ordinances
- Adoption or modification of annual budget, including capital projects
- Property acquisition (excepting rights of way)
- Appointment of Fiscal Agent and Treasurer, subject to the provisions of Section 9.03 and/or Section 10.04, Administrator, Plan Manager or General Legal Counsel
- Minor, administrative amendments to this Agreement not subject to Section 12.02.02

Section 7.07 – Unanimous Voting Requirement.

Items that require a unanimous vote of the Board to pass consist of the following, which may be amended from time to time by the Board by a unanimous vote, or as otherwise required by law:

- Financial Commitments of the Members, whether through the budget approval process or otherwise

Article VIII: Board Committees

Section 8.01 – Committees of the Board.

The Board of Directors may from time to time establish one or more advisory committees or establish standing or ad hoc committees to assist in carrying out the purposes and objects of the Authority. The Board shall determine the purpose and need for such committees and the necessary qualifications for individuals appointed to them.

Section 8.02 – Advisory Committee.

The Board shall establish an Advisory Committee. Meetings of the Advisory Committee shall be noticed, held, and conducted in accordance with the provisions of The Brown Act (California Government Code sections 54950, *et seq*.). Through the use of the Advisory Committee, the Board shall ensure that the development of the GSP includes the meaningful participation of all beneficial uses and users of groundwater in the Basin.

Composition of the Advisory Committee is intended to represent the beneficial uses and users of groundwater identified in SGMA. A Committee member's participation shall not violate the California Political Reform Act of 1974 (Gov. Code, § 81000 et seq.), the provisions of California Government Code section 1090 et seq., or any other applicable law. The Advisory Committee's purpose and membership is described in Exhibit B.

Article IX: Operations and Management.

Section 9.01 – Administrator and Plan Manager.

9.01.01 Administrator: The Board may appoint an Administrator, from time-to-time as and when it deems appropriate. If appointed, the Administrator shall serve at the pleasure of the Board of Directors and his/her duties and responsibilities shall be set forth by the Board. The Administrator shall have the authority to hire employees, consistent with the approved budget.

9.01.02 Plan Manager: The Board shall appoint a Plan Manager. The Administrator and Plan Manager may be the same individual. The Plan Manager shall serve at the pleasure of the Board of Directors and his/her duties and responsibilities shall be set forth by the Board.

Section 9.02 – Legal Counsel and Other Officers.

The Agency may appoint General Legal Counsel who shall serve at the pleasure of the Board. Subject to the limits of the Agency's approved budget, the Board shall also have the power to appoint and contract for the services of other officers, consultants, advisers and independent contractors as it may deem necessary or convenient for the business of the Agency, all of whom shall serve at the pleasure of the Board. The appointed General Legal Counsel and other appointed officers of the Agency may be employees or contractors of one or more of the Members, in accordance with Sections 9.03 and 11.04. Appointment of a General Legal Counsel from among Member employees or contractors shall be subject to all applicable Rules of Professional Responsibility, and notwithstanding anything to the contrary in this Agreement, each of the Members expressly reserve and do not waive their rights to approve or disapprove of potential conflicts of Agency General Legal Counsel.

Section 9.03 – Employees and Management.

In addition to, or in lieu of, hiring employees, the Agency may engage one or more Members to manage any or all of the business of the Agency on terms and conditions acceptable to the Board of Directors. Any Member so engaged shall have such responsibilities as are set forth in the contract for such Member's services, which shall be approved by a super-majority vote of the Directors representing the non-contracting Member.

Section 9.04 – Principal Office.

At the initial meeting of the Board, the Board shall establish a principal office for the Agency, which shall be located at a place overlying the Basin. The Board may change the principal office from time to time so long as that principal office remains at a location overlying the Basin.

Section 9.05 – Bylaws.

The Board shall adopt Bylaws governing the conduct of meetings and the day-to-day operations of the Agency on or before the first anniversary of the Effective Date of this Agreement.

Section 9.06 – Official Seal and Letterhead.

The Board may adopt, and/or amend, an official seal and letterhead for the Agency.

Section 9.07 – Conflict of Interest Code.

The Board shall adopt and file a Conflict of Interest Code pursuant to the provisions of the Political Reform Act of 1974 within six months of the Effective Date. The Board may review and revise the Conflict of Interest Code from time to time as appropriate or when required by law.

Article X: Financial Provisions

Section 10.01 – Establishment of Funds.

The Board shall establish and maintain such funds and accounts as may be required by generally accepted public agency accounting practices. The Agency shall maintain strict accountability of all funds and report all receipts and disbursements of the Agency on no less than a quarterly basis.

Section 10.02 – Initial Agency Funding Commitments.

In order to initially fund the Agency, the Members, as well as the MWC/PUCRs pursuant to the participation agreement, shall each provide the funding commitment amounts listed in the tables below ("Funding Commitment"), with the Funding Commitment to be paid by the identified due dates in the tables below. Such Funding Commitments may be made by payment to the Agency, providing services to the Agency through an agreement with the Agency, or through a combination of both. If any portion of a Member's Funding Commitment is to be provided through a services agreement, such Member shall strive to enter into a services agreement with the Agency by the initial due date. The timeframe for payment of any remainder amounts shall be determined

by the Board of Directors based on the funding and operational needs of the Agency, and shall be due and payable within thirty (30) days of request for funds as issued by the Agency, provided that billing of Members may take into account the larger agency Members' ability and willingness to make payments prior to the smaller agency Members. To the extent the Agency is able to secure other funding sources in the future, and to the extent permitted by law, the Agency shall reimburse any Funding Commitment amount to each Member on a proportionate basis.

Fiscal Year 2017-18:

	Total FY 2017-18 Commitment	**Initial Commitment amount due by July 31, 2017**
City of Cotati	$ 55,000	$ 18,000
City of Rohnert Park	$ 55,000	$ 18,000
City of Santa Rosa	$ 55,000	$ 18,000
Town of Windsor	$ 55,000	$ 18,000
Gold Ridge Resource Conservation District	$ 55,000	$ 18,000
Sonoma Resource Conservation District	$ 20,000	$ 6,600
County of Sonoma	$ 55,000	$ 18,000
Sonoma County Water Agency	$ 55,000	$ 18,000
MWC/PUCR*	$ 55,000	$ 18,000
TOTAL	**$460,000**	**$150,600**

For Fiscal Year 2018-19, the Members shall each be prepared to make the following Funding Commitment to the Agency based on a projected annual budget amount of $530,000, provided, however, that it is understood and agreed that the actual funding needs of the Agency may vary and will depend on the actual 2018-19 budget as adopted by the Board. In the event the funding needs are greater than those anticipated in the proposed fiscal year 2018-19 budget, any excess Funding Commitment is subject to Board approval pursuant to Section 7.07.

* The Initial Funding Commitment of the MWC/PUCRs shall be due within 30 days of final approval and execution of the MWC/PUCRs participation agreement or by July 31st, whichever date is later.

	Total FY 2018-19 Commitment	**Initial Funding Commitment amount due by July 31, 2018**
City of Cotati	$ 64,000	$ 21,000
City of Rohnert Park	$ 64,000	$ 21,000
City of Santa Rosa	$ 64,000	$ 21,000
Town of Windsor	$ 64,000	$ 21,000
Gold Ridge Resource Conservation District	$ 64,000	$ 21,000
Sonoma Resource Conservation District	$ 20,000	$ 6,600
County of Sonoma	$ 64,000	$ 21,000
Sonoma County Water Agency	$ 64,000	$ 21,000
MWC/PUCR	$ 64,000	$ 21,000
TOTAL	**$532,000**	**$174,600**

Section 10.03 – Fiscal Year.

The Fiscal Year of the Agency shall be July 1 to June 30.

Section 10.04 – Treasurer and Annual Audit.

The Sonoma County Auditor-Controller-Treasurer-Tax Collector shall act as the initial Treasurer for the Agency. The Treasurer shall perform all usual and customary duties of their offices for the Agency, including but not limited to receiving all deposits, issuing warrants per direction, and other duties specified in Government Code section 6505.5. The Board may transfer the responsibilities of the Treasurer, by three-fourths supermajority vote of the Board, to any other person or entity as the law may provide at the time (see e.g., Government Code section 6505.5). The Board shall cause an independent annual audit to be made by a certified public accountant, or public accountant, in compliance with Government Code section 6505.

Section 10.05 – Funds; Property; Bonds.

The Board may from time to time designate the officers and persons, in addition to those specified in Section 10.04 above, who shall have charge of, handle, or have access to any funds and/or property of the Agency. Pursuant to California Government Code section 6505.1, each such officer and person shall file a bond in an amount designated by the Board.

Section 10.06 – Budget.

The Board shall adopt a budget for the Agency for the ensuing Fiscal Year not later than April 1st of each year. The Board may authorize mid-year budget adjustments, as needed.

Section 10.07 – Payments To The Agency.

All fees, costs and expenses incurred by the Agency may be funded from: (i) voluntary contributions from third parties, such as grants; (ii) voluntary contributions, advances or loans from the Members or other sources; (iii) bond revenue; (iv) taxes, assessments, fees and/or charges levied by the Agency under the provisions of SGMA or otherwise provided by law; and, (v) subject to the unanimous vote of the Board, assessments on the Members to carry out the activities of the Agency generally applicable to all Members.

Article XI: Relationship of Agency And Its Members.

Section 11.01 – Separate Entity.

In accordance with California Government Code Sections 6506 and 6507, the Agency shall be a public entity separate and apart from the parties to this Agreement.

Section 11.02 – Liabilities.

In accordance with California Government Code section 6508.1, the debt, liabilities and obligations of the Agency shall be the debts, liabilities and obligations of the Agency alone and not of its Members. The Members do not intend hereby to be obligated either jointly or severally for the debts, liabilities or obligations of the Agency, except as may be specifically provided for in California Government Code Section 895.2 as amended or supplemented.

Section 11.03 – Indemnity and Insurance.

11.03.01 Indemnity. Funds of the Agency may be used to defend, indemnify, and hold harmless the Agency, each Member, each Director, and any officers, agents and employees of the Agency for their actions taken within the course and scope of their duties while acting on behalf of the Agency. To the fullest extent permitted by law, the Agency agrees to save, indemnify, defend and hold harmless each Member, each Director, and any officers, agents and employees of the Agency from any liability, claims, suits, actions, arbitration proceedings, administrative proceedings, regulatory proceedings, losses, expenses or costs of any kind, whether actual, alleged or threatened, including attorney's fees and costs, court costs, interest, defense costs, and expert witness fees, where the same arise out of, or are attributable in whole or in part, to the conduct, activities, operations, acts, and omissions of the Agency.

11.03.02 – Agency Insurance and Liability Coverage Requirements.

The Agency shall be required to obtain insurance, or join a self-insurance program in which one or more of the Members participate, appropriate for its operations. Any and all insurance coverages provided by the Agency, and/or any self-insurance programs joined by the Agency, shall name each and every Member as an additional insured for all liability arising out of or in connection with the operations by or on behalf of the named insured in the performance of this Agreement. Minimum levels of the insurance or self-insurance program shall be set by the Agency in its ordinary course of business. The Agency shall also require all of its contractors and subcontractors to have insurance appropriate for their operations. All amounts coverages and

provisions of the insurance policies identified in this Section 11.03B shall be subject to the approval of Agency Legal Counsel.

Section 11.04 – Agreements With Member Agencies.

The Board may approve agreements with one or more Members that agree to undertake activities to benefit the Agency and further its purposes by a majority vote of the Directors representing the non-contracting Members.

Section 11.05 – Withdrawal of Members.

Any Member shall the have the ability to withdraw by providing one hundred eighty (180) days written notice of its intention to withdraw. Said notice shall be given to the Board and to each of the other Members.

A Member shall not be fiscally liable for the adopted budget provided that the Member provides written notice one hundred eighty (180) days prior to the adoption of the budget.

Notwithstanding the foregoing, any Member shall have the ability to withdraw by providing not less than ninety (90) days written notice of its intention to withdraw prior to the adoption of the 2018-19 budget. A Member shall not be fiscally liable for the fiscal year 2018-19 Funding Commitment provided that said Member has provided a timely notice of its intent to withdraw to the Board and each of the other Members.

In the event of a withdrawal, this Agreement shall continue in full force and effect among the remaining members as set forth in Section 11.07 below.

Section 11.06 – Termination of Members.

Any Member's failure to meet its funding obligations pursuant to Sections 10.02 or 10.07 of this Agreement may be treated as a breach of this Agreement and the Board may vote to terminate such Member. Such termination shall be approved by unanimous consent of all Directors except the Director of the Member proposed to be terminated. In lieu of termination, the Board may in its discretion vote to suspend a Member's voting privileges for failure to meet its funding obligations pursuant to Section 10.02 or 10.07 until the Member has satisfied its funding obligations. Such suspension of voting privileges shall be approved by a supermajority vote, as defined in Section 7.06 above but excepting the Director of the Member proposed to have its voting privileges suspended. In the event a Member's voting privileges are suspended, that Member shall not be counted for purposes of determining a majority or supermajority vote in accordance with Sections 7.05 and 7.06. In the event of termination of a Member, this Agreement shall continue in full force and effect among the remaining members as set forth in Section 11.07 below, and such action by the Board shall not be subject to the requirements of Section 12.02. Before terminating a Member for breach pursuant to this section, the Board must satisfy the meet and confer requirements under Section 12.04. As part of the meet and confer process, the Board and the Member proposed to be terminated may conduct mediation in accordance with Section 12.04.

Any Member's failure to be represented by a Director or Alternate Director of the Member for three consecutive meetings (regular or special) of the Board may be considered a breach of this Agreement for which the Board may vote to suspend a Member's voting privileges for one or more meetings of the Board. Such suspension of voting privileges shall be approved by a supermajority vote, as defined in Section 7.06 above but excepting the Director of the Member proposed to have its voting privileges suspended. In the event a Member's voting privileges are suspended, that

Member shall not be counted as a member of the Board for purposes of determining a majority or supermajority vote in accordance with Sections 7.05 and 7.06.

Suspension of a Member's voting privileges under this section shall not excuse that Member from its obligations under this Agreement, including but not limited to, continuing Funding Commitments to the Agency and attendance at meetings.

Section 11.07 – Continuing Obligations upon Withdrawal or Termination.

Except as provided for in Section 11.05, any withdrawal or termination of a Member, shall not relieve the withdrawing or terminating Member of its financial obligations arising under this Agreement prior to the effective date of the withdrawal or termination, including but not limited to financial obligations or guarantees for loans provided by individual Members, if applicable.

The withdrawal or termination of one or more Members shall not terminate this Agreement or result in the dissolution of the Agency. This Agreement shall remain in full force and effect among the remaining members, following the withdrawal or termination of any Member, and the Agency shall remain in operation provided that there are at least two Members remaining in this Agreement, and shall continue to function as the GSA for the Basin.

Section 11.08 – Dissolution.

The Agency may be dissolved at any time upon the unanimous vote of the Board. However, the Agency shall not be dissolved until all debts and liabilities of the Agency have been eliminated, or allocated, assigned and assumed by individual Members, or another entity or individual. Upon Dissolution of the Agency, each Member shall receive its proportionate share (in proportion to the contributions made by each Member) of any remaining assets after all Agency liabilities and obligations have been paid in full. The distribution of remaining assets may be made "in kind" or assets may be sold and the proceeds thereof distributed to the Members. This distribution shall occur within a reasonable time after dissolution. No former member which previously withdrew or was terminated shall be entitled to a distribution upon dissolution.

Section 11.09 – Disposition of Property Upon Termination of Agency or Board Determination of Surplus.

Upon termination of this Agreement or upon determination by the Board that any surplus money is on hand, such surplus money shall be returned to the then Members of the Agency that contributed such monies in proportion to their contributions or such surplus money may be applied to a Board designated reserve account. The Board shall first offer any surplus properties, works, rights and interests of the Agency for sale to the individual Member and the sale shall be based on highest bid. If no such sale is consummated, the Board shall offer the surplus properties, works, rights and interests of the Agency for sale in accordance with applicable law to any governmental agency, private entity or persons for good and adequate consideration.

Article XII: Miscellaneous Provisions

Section 12.01 – Agreement Complete.

The foregoing constitutes the full and complete Agreement of the Members. This

Agreement supersedes all prior agreements and understandings, whether in writing or oral, related to the subject matter of this Agreement that are not set forth in writing herein.

Section 12.02 – Amendment.

12.02.01 Minor Amendments. Minor, administrative amendments to this Agreement may be made by supermajority vote pursuant to Section 7.06.

12.02.02. Other Amendments. Amendments to this Agreement related to the following provisions may be amended from time to time by the unanimous consent of the Members, acting through their governing bodies. Such amendments shall be in the form of a writing signed by each Member.

- Any change in Powers
- Any change in Board composition, except as already provided for in this Agreement
- Any change in Voting requirements
- Any changes to Liabilities and Indemnification provisions
- Any changes to Termination and Withdrawal provisions
- Elimination of the Advisory Committee

Section 12.03 – Successors and Assigns.

The rights and duties of the Members may not be assigned or delegated without the written consent of all other Members. Any attempt to assign or delegate such rights or duties in contravention of this Agreement shall be null and void. Any assignment or delegation permitted under the terms of this Agreement shall be consistent with the terms of any contracts, resolutions or indentures of the Agency then in effect.

This Agreement shall inure to the benefit of and be binding upon the successors and assigns of the Members hereto. This section does not prohibit a Member from entering into an independent agreement with another agency regarding the financing of that Member's contributions to the Agency or the disposition of proceeds, which that Member receives under this Agreement so long as such independent agreement does not affect, or purport to affect, the rights and duties of the Agency or the Members under this Agreement.

Section 12.04 – Dispute Resolution.

In the event there are disputes and/or controversies relating to the interpretation, construction, performance, termination, breach of, withdrawal from or other issue related to this Agreement, the Members that are party to the dispute (the "Disputing Parties") agree to meet and confer in a good faith attempt to resolve the dispute. On the request of any Disputing Party to meet and confer, the other Disputing Parties agree to provide available dates within 21days of the meet and confer request. The Disputing Parties may agree to schedule additional meet and confer sessions. If the Disputing Parties are unable to resolve the dispute by meeting and conferring, they shall mediate the dispute. The cost of any such mediation will be borne equally by the

Disputing Parties. If the Disputing Parties cannot agree on a mediator, they may select a mediator by alternately striking names from a list of available mediators from JAMS or a similar mediation service provider. The Disputing Parties will provide all other Members written notice of any scheduled mediation and the issues subject to mediation at least 10business days prior to the mediation. One representative for each Member not party to the dispute and one Agency staff representative may attend any mediation under this section to represent the Members' and the Agency's interests related to the mediation. The cost of such representatives' attendance shall be borne by the Members and the Agency so represented. The mediator may, in the mediator's sole discretion limit the participation of representatives of Members not party to the dispute and/or any Agency representative in the interest of successfully mediating the dispute.

No settlement of a dispute subject to this section will bind the Agency or any Members not party to the dispute except to the extent the settlement is approved by the Agency Board by unanimous vote of the Directors of the non-disputing Members.

Section 12.05 – Execution In Parts Or Counterparts.

This Agreement may be executed in parts or counterparts, each part or counterpart being an exact duplicate of all other parts or counterparts, and all parts or counterparts shall be considered as constituting one complete original and may be attached together when executed by the Members hereto. Facsimile or electronic signatures shall be binding.

Section 12.06 – Member Authorization.

The governing bodies of the Members have each authorized execution of this Agreement, as evidenced by their respective signatures below.

Section 12.07 – No Predetermination or Irretrievable Commitment of Resources.

Nothing herein shall constitute a determination by the Agency or any Member that any action shall be undertaken or that any unconditional or irretrievable commitment of resources shall be made, until such time as the required compliance with all local, state, or federal laws, including without limitation the California Environmental Quality Act, National Environmental Policy Act, or permit requirements, as applicable, have been completed.

Section 12.08 – Notices.

Notices authorized or required to be given pursuant to this Agreement shall be in writing and shall be deemed to have been given when mailed, postage prepaid, or delivered during working hours to the addresses set forth for each of the Members hereto on Exhibit "A" of this Agreement, or to such other changed addresses communicated to the Agency and the Members in writing.

Section 12.09 – Severability And Validity Of Agreement.

Should the participation of any Member to this Agreement, or any part, term or provision of this Agreement be decided by the courts or the legislature to be illegal, in excess of that Member's authority, in conflict with any law of the State of California, or otherwise rendered unenforceable or ineffectual, the validity of the remaining portions, terms or provisions of this Agreement shall not be affected thereby and each Member hereby agrees it would have entered

into this Agreement upon the same remaining terms as provided herein.

Section 12.10 – Singular Includes Plural.

Whenever used in this Agreement, the singular form of any term includes the plural form and the plural form includes the singular form.

IN WITNESS WHEREOF, the Members hereto, pursuant to resolutions duly and regularly adopted by their respective Board of Directors or governing board, have caused their names to be affixed by their proper and respective officers as of the day and year first above-written.

SIGNATURE LINES

CITY OF SANTA ROSA

By: _____

Name: _____

Title:_____

Date: _____

SONOMA COUNTY WATER AGENCY

By: _____

Name: _____

Title:_____

Date: _____

COUNTY OF SONOMA

By: _____

Name: _____

Title:_____

Date: _____

CITY OF ROHNERT PARK

By: _____

Name: _____

Title:_____

Date: _____

TOWN OF WINDSOR

By: _____

Name: _____

Title:_____

Date: _____

CITY OF COTATI

By: _____

Name: _____

Title:_____

Date: _____

SONOMA RESOURCE CONSERVATION DISTRICT

By: _____

Name: _____

Title:_____

Date: _____

GOLD RIDGE RESOURCE CONSERVATION DISTRICT

By: _____

Name: _____

Title:_____

Date: _____

EXHIBIT A

MEMBERS

City of Cotati

City of Rohnert Park

City of Santa Rosa

City of Sebastopol

Town of Windsor

Sonoma Resource Conservation District

Gold Ridge Resource Conservation District

Sonoma County Water Agency

County of Sonoma

EXHIBIT B

Advisory Committee to the Agency Board

The purpose of the Advisory Committee is to provide input and recommendations to the Agency Board on groundwater sustainability plan development and implementation and GSA policies. The intent of the committee is to provide community perspective and participation in the GSA.

The Advisory Committee will review and/or provide recommendations to the Agency Board on groundwater-related issues that may include:

- Development, adoption or amendment of the GSP
- Sustainability goals and objectives
- Best management practices
- Monitoring programs
- Annual work plans and reports (including mandatory 5-year milestone reports)
- Modeling scenarios
- Inter-basin coordination activities
- Projects and management actions to achieve sustainability
- Community outreach
- Local regulations to implement SGMA
- Fee proposals
- General advisory

The Advisory Committee will not be involved in the Agency budget or day-to-day operations, such as personnel staffing or contracting.

Membership

Composition of the Advisory Committee is intended to represent the beneficial uses and users of groundwater identified in the Sustainable Groundwater Management Act. Committee members may not serve concurrently on the Agency Board. Members must live or work within the Santa Rosa Plain Groundwater Basin or represent an organization with a presence in Santa Rosa Plain Groundwater Basin identified by the Department of Water Resources current Bulletin 118. Committee membership is based on the interest group and member agency designations described below. Notwithstanding the foregoing, the Board may choose to appoint one of the interest-based members of the Advisory Committee from outside the Bulletin 118 Basin, provided such member resides, works or represents an organization with a presence in the watershed which contributes to the Basin.

Each Member of the Agency, as well as the MWC/PUCRs, will appoint a representative from staff or the community to the Advisory Committee, for a total of ten members:

1. City of Santa Rosa
2. Town of Windsor
3. City of Rohnert Park
4. City of Cotati

5. City of Sebastopol
6. Sonoma County
7. Sonoma County Water Agency
8. Sonoma Resource Conservation District
9. Gold Ridge Resource Conservation District
10. Mutual Water Companies/ PUC-Regulated

The following GSA eligible entities have elected not to participate on the Agency Board but shall hold a seat on the Advisory Committee. These entities, not the Agency Board, will appoint their representatives:

11. Graton Rancheria

The Agency Board will appoint 7 interest-based members:

12. Environmental representative
13. Environmental representative
14. Rural residential well owner
15. Rural residential well owner
16. Business community representative
17. Agricultural interest (surface water or Groundwater user)
18. Agricultural interest (surface water or Groundwater user)

Member Appointment

The Agency Board will appoint members to fill the interest-based seats. Interested individuals from the community or local organizations may apply to the Agency Board, designating in the application, the seat that the applicant would intend to fill.

The Agency Board encourages entities and individuals within each interest group to work together to recommend a single candidate to fill that interest's seat. The Agency Board will give strong consideration to appointing candidates that have the backing of multiple organizations or individuals within that interest group.

The Agency Board encourages candidates with experience and familiarity with groundwater and its management. The Agency Board will also give preference to applicants with experience working with diverse community-based groups.

For one of the rural residential well representatives, the Agency Board will give preference to appointees that can represent the interests of disadvantaged populations or interests that are otherwise under-represented on the Advisory Committee.

For agricultural representatives, preference will be given for diversity between surface and groundwater reliance for agricultural operations.

Application Timeline

The Agency Board will establish a timeline and process for appointment of the initial Advisory Committee following Agency formation. In subsequent years, applicants will submit an application and statement of interest for vacant seats to the Agency Board by October 1 of the year prior to the beginning of the term for that seat. The GSA will post applications on its web site. At-large appointments from Members will be due to the Agency Board by November 1. The GSA governing board will appoint interest-based

committee members at its final meeting of each calendar year as necessary. Terms will commence in January of the subsequent year.

Advisory Committee Member Terms

The initial Advisory Committee appointments will include seats with three-year terms (interest-based categories) and two-year terms (eligible entity appointees). Following initial committee appointment, all member terms will be two years. Advisory Committee Members are not term-limited; however, interest-based members must apply for each term. If a vacancy occurs for an interest-based seat before the end of the term, the Agency Board will appoint a new member to complete the term. Vacancies for any of the eligible entity appointees shall be filled by their respective agency.

The Agency Board can remove an interest-based committee member if the member is not performing responsibilities. The Agency Board will appoint alternates if the Board deems alternate committee members necessary. If appointing alternates, the Agency Board will request that the Member agency also provide alternates for eligible entity appointments.

Decision Making and Governing Board Consideration

To inform Agency Board decision-making, the Advisory Committee will provide written recommendations in reports. The recommendations reports will identify areas of agreement and disagreement. The committee will strive for consensus when possible, but reaching consensus is not necessary. Consensus means that everyone can at least "live with it." When unable to reach consensus on recommendations, the committee will outline the areas in which it does not agree, providing some explanation to inform Agency Board decision-making.

The committee may request that one or more committee members present its recommendations to the Agency Board, including areas of agreement and disagreement, consistent with committee deliberations.

Pursuant to Agency Board direction, Agency staff will develop the annual work plan and schedule for committee meetings. The Advisory Committee will adopt a charter and will appoint a Chair and Vice-Chair.

The Agency Board will consider Advisory Committee recommendations when making decisions. If the Agency Board does not agree with the recommendations of the Advisory Committee, the Agency Board shall state the reasons for its decision.

Public Process

All Advisory Committee meetings are subject to the Brown Act and will be open to the public. The GSA will announce committee meetings on its website and through its regular communication channels.

Appendix 1-C
Santa Rosa Plain Groundwater Sustainability Agency
Board and Advisory Committee Members

Appendix 1-B

Santa Rosa Plain GSA Board and Advisory Committee Members

Santa Rosa Plain Board Members		
Name	**Represents**	**Time Served**
Tom Schwedhelm, Chair	City of Santa Rosa	June 2017-Current
Susan Harvey, Vice-Chair	City of Cotati	June 2017-Current
Joe Dutton	Gold Ridge Resource Conservation District	June 2017-Current
Lynda Hopkins	Sonoma County Water Agency	June 2017-Current
Evan Jacobs	Independent Water Systems	Nov 2017-Current
Sam Salmon	Town of Windsor	January 2021-Current
John Nagle	Sonoma Resource Conservation District	Feb 2018-Current*
Pam Stafford	City of Rohnert Park	June 2017-Current*
Patrick Slayter	City of Sebastopol	December 2020-Current
Chris Coursey	County of Sonoma	January 2021-Current
Past Board Members		
Gina Belforte	City of Rohnert Park	June 2017-June 2018
Michael Carnacchi	City of Sebastopol	Aug 2019-Dec 2020
Debora Fudge	Town of Windsor	Jan 2019-Dec 2020
Mark Millan	Town of Windsor	June 2017-Dec 2018
Walt Ryan	Sonoma Resource Conservation District	June 2017-Aug 2021
Shirlee Zane	County of Sonoma	June 2017-Dec 2020

*The Rohnert Park and Sonoma RCD appointees served as Board members or alternates.

Santa Rosa Plain GSA Advisory Committee Members		
Name	**Represents**	**Time Served**
Bob Anderson, Chair	Agricultural Interests	Oct 2017-Current
Rue Furch, Vice-Chair	Environmental Interests	Oct 2017-Current
Elizabeth Cargay	Town of Windsor	March 2021- Current
Carolyn Dixon	Sonoma County Water Agency	Oct 2017-Current
Joe Gaffney	City of Sebastopol	June 2021-Current
Maureen Geary	Graton Rancheria	Oct 2017-Current
Mark Grismer	County of Sonoma	Oct 2017-Current
Wayne Haydon	Sonoma Resource Conservation District	Oct 2017-Current
Beth Lamb	Environmental Interests	February 2020-Current
David Long	Agricultural Interests	Oct 2017 -Current
Peter Martin	City of Santa Rosa	March 2020-Current
David Noren	Rural Residential Well Owners	April 2020-Current
Matt O'Conner	Gold Ridge Resource Conservation District	Oct 2017-Current
Mary Grace Pawson	City of Rohnert Park	Oct 2017-Current
John Rosenblum	Independent Water Systems	Jan 2019-Current
Craig Scott	City of Cotati	Oct 2017-Current
Marlene Soiland	Rural Residential Well Owners	Oct 2017-Current

Past Advisory Committee Members		
Chris Bates	Independent Water Systems	Oct 2017-Dec 2018
Jennifer Burke	City of Santa Rosa	Oct 2017-Jan 2019
Sebastian Bertsch	Environmental Interests	Oct 2017-Dec 2019
Colin Close	City of Santa Rosa	Oct 2017-Jan 2019
Doug Berretta	Agricultural representative	Oct 2017-Dec 2019
Joe Gaffney	Business Interests	Oct 2017-June 2021
Henry Mikus	City of Sebastopol	Oct 2017-Nov 2020
Sandi Potter	Town of Windsor	Oct 2017-Feb2021

Appendix 1-D
Santa Rosa Plain Groundwater Sustainability Agency
Advisory Committee Charter

Santa Rosa Plain Groundwater Sustainability Agency
Advisory Committee Charter

Adopted by consensus – January 8, 2018
Amended by consensus – May 7, 2018

The purpose of the Advisory Committee is to advise the Santa Rosa Plain Groundwater Sustainability Agency ("SRPGSA" or "Agency") Board of Directors ("Board") on groundwater sustainability plan development and implementation, and on Agency policies. The intent of the Committee is to provide community perspective and participation to the Agency. The Committee will make recommendations that the SRPGSA Board will consider in its decision-making.

The Advisory Committee may review or provide recommendations to the Board on groundwater-related issues:

- Development, adoption, or amendment of the groundwater sustainability plan
- Sustainability goals and objectives
- Technical and reporting standards, including best management practices, data management and reporting
- Monitoring programs
- Annual work plans and reports (including mandatory 5-year milestone reports)
- Modeling scenarios
- Inter-basin coordination activities
- Project and management actions to achieve sustainability
- Grant funding proposals
- Community outreach
- Local regulations to implement SGMA
- Fee proposals
- General advisory in response to Board inquiries

The Advisory Committee will not be involved in Agency budgets or day-to-day operations, such as personnel staffing or contracting.

Brown Act, Open Process, and Conflicts of Interest

All meetings of the Advisory Committee are open to the public. The Agency will announce Committee meetings on its web site and through its regular communication channels.

Advisory Committee meetings are subject to the Brown Act. The Advisory Committee shall adopt a schedule and location for regular meetings, and meeting agendas shall be posted in accordance with the Brown Act.

All Advisory Committee meetings shall provide for public comment in accordance with the Brown Act, including non-agenda public comment and public comment on individual agenda items. Speakers will generally be limited to 2 minutes, but time may be adjusted based upon meeting circumstances. As needed, time limits may be placed on public comments to ensure the Advisory Committee is reasonably able to address all agenda items during the course of the meeting. Special and emergency meetings need not provide for non-agenda public comment,

but such comment may be allowed in the Advisory Committee's discretion. Members of the Advisory Committee are subject to all applicable conflict of interest laws including Government Code section 1090 and the California Political Reform Act. The Board shall adopt a conflict of interest code for the Advisory Committee.

Roles and Responsibilities

Advisory Committee

The role and responsibility of the Advisory Committee is to solicit and incorporate community and stakeholder interests into recommendations on SGMA implementation in the Santa Rosa Plain Groundwater Basin for the Board to consider in its decision-making process. The Advisory Committee will also, to the best of its ability, integrate

in the Santa Rosa Plain.

Advisory Committee members ("members") reflect the diverse interests of local public agencies and groundwater users. The criteria for Advisory Committee members are to:

- Serve as a strong, effective advocate for the interest group represented
- Work collaboratively with each other
- Commit time needed for ongoing discussions
- Collectively reflect diversity of interests

As part of membership, members agree to:

- Arrive at each meeting fully prepared to discuss the issues on the agenda. Preparation may include reviewing meeting summaries, technical information, and draft documents distributed in advance of each meeting.
- Present their constituent members' views on the issues being discussed and be willing to engage in respectful, constructive dialogue with other members of the group.
- Develop a problem-solving approach in which they consider the interests and viewpoints of all group members, in addition to their own.
- Keep their constituencies informed about the deliberations and actively seek their constituents' input.

Chair

The Advisory Committee will appoint a chair and vice-chair. The chair for the Advisory Committee agrees to:

- Work with the Agency Administrator and facilitator to develop the agenda for all Advisory Committee meetings.
- Assist in framing issues so members are able to have a productive conversation and develop recommendations.
- Brief the Board on the nature and progress of the committee at key milestones, and on recommendations from the Advisory Committee.
- Serve as the Advisory Committee media spokesperson in cooperation with the Agency communications lead.

Administrator

- Maintain a current roster of Advisory Committee members.
- Work with GSA Board to fill Advisory Committee vacancies, as needed.
- In coordination with the facilitator and Advisory Committee chair, prepare agendas for

Advisory Committee meetings.
- Notice all meetings in accordance with the Brown Act.
- Staff all meetings, record minutes and develop and distribute meeting summaries.
- Work with the committee and GSA Board to develop annual workplan and schedule for Advisory Committee meetings.
- Facilitate the process of incorporating Advisory Committee recommendations into Board packets.
- Provide options and ensure records for AC 1234 Ethics Training and Brown Act Training for Advisory Committee members.

Facilitator

As resources allow, a third-party facilitator may provide impartial facilitation services for Advisory Committee meetings. The facilitator's primary responsibility is to ensure an open process where all member interests are heard and thoughtfully considered. To this end, the facilitator works on behalf of the process and the members contributing to Advisory Committee efforts. Specific responsibilities include:

- Support the Agency Administrator and Advisory Committee Chair and/or Vice Chair in developing and distributing Advisory Committee agendas and relevant materials.
- Advocate for a fair, effective, and credible process, but remain impartial with respect to the outcome of the deliberations.
- Apply collaborative, interest-based negotiation methods that foster openness and identify areas of preliminary and final consensus agreement for advice and recommendations to the Board.
- In the absence of consensus, help identify areas of agreement and disagreement.
- Check in with members as needed to ensure all issues are identified and explored.
- Coordinate with the Agency Administrator and Chair or Vice Chair to ensure accurate, impartial documentation of meetings and agreements (i.e. meeting summaries and recommendation reports).
- Ensure all members uphold the tenets of the charter.

Decision-Making

To inform SRPGSA Board decision-making, the Advisory Committee will provide written recommendations in reports that reflect the outcome of Advisory Committee recommendations or decisions. The recommendation reports will reflect all of the opinions of committee members, and will identify areas of agreement and disagreement. The Committee may request that one or more Advisory Committee members present its recommendations to the Board, including areas of agreement and disagreement, consistent with Advisory Committee deliberations. The SRPGSA Board will consider Advisory Committee recommendations when making decisions. If the Board does not agree with the recommendations of the Advisory Committee, the Board shall state the reasons for its final decision.

The Advisory Committee will strive for consensus (agreement among all members) in all of its decision-making. Working toward consensus is a fundamental principle. Consensus means that all Advisory Committee members either fully support or can live with a recommendation. In reaching consensus, some Advisory Committee members may strongly endorse a particular proposal while others may accept it as "workable." Others may be only able to "live with it." Still others may choose to "stand aside" by verbally noting a disagreement, yet allowing all other

members of the group to reach a consensus without them if the recommendation does not affect them or compromise their interests. Any of these actions constitutes consensus.

Any Advisory Committee member or members that disagree with a recommendation must provide an alternative that attempts to meet his/her interests while also meeting the interests of other members. The Advisory Committee will strive for consensus, but shall not limit itself to strict consensus if 100% agreement among all participants cannot be reached after all interests and options have been thoroughly identified, explored, and discussed. Less-than-consensus recommendation-making shall not be undertaken lightly. When unable to reach consensus on advice or recommendations, the Committee will outline the areas in which it does not agree, providing some explanation of both majority and minority viewpoints in its recommendation reports that inform Board decision-making. When outlining areas in which the Advisory Committee does not agree, numbers of votes on any items will also be clearly recorded and presented to the Board.

In order to hold a meeting and conduct business (e.g. make and advance a recommendation to the Board), a quorum of the Advisory Committee must be present. A simple majority of the total number of filled Advisory Committee member seats constitutes a quorum.

From time to time, members may be unable to attend Advisory Committee meetings. In order to continue to run efficient meetings and make recommendations or decisions timely, each member may choose to submit a proxy to weigh in on recommendations or decisions that are noticed on the agenda. Members must submit proxies to the Agency Administrator, but may designate either the Agency Administrator or another committee member to carry the proxy. Proxies carried by other members may allow the member carrying the proxy the latitude to weigh in for the absent member (i.e. the absent member fully supports, can live with or does not support, or is willing to stand aside) on recommendations or decisions should the substance of said recommendations or decisions change during the course of the meeting. All proxies shall be in writing and must be received by the Agency Administrator before the start of the meeting; this includes noting in writing when a committee member holding a proxy of another member has the latitude to weigh in for that member on recommendations or decisions that change during the course of the meeting. Any submitted proxies will be announced the outset of the meeting.

Subcommittees

The Advisory Committee can form ad hoc subcommittees or workgroups to assist with its charge advising the SRPGSA Board on groundwater sustainability plan development and implementation, and on Agency policies. Subcommittee or workgroup composition should be representative of diverse groundwater interests.

On an as needed basis, and in coordination with GSA staff, the facilitator, and Advisory Committee members, the chair will call for, solicit interested committee member participation, and affirm establishment of ad hoc workgroups. The number of members on any ad hoc workgroup will generally be limited to five to ensure manageable group size and efficiency of work effort. If strong interest is expressed by committee members, the maximum number will be eight. Upon establishment, the chair will generally define the scope and expected duration of any ad hoc workgroup. As needed, the chair may adjust the scope and extend the duration of