

February 2, 2021

Mr. Christopher Watt  
North Coast Regional Water Control Board  
5550 Skylane Blvd, Suite A  
Santa Rosa, CA 95403

Submitted via email: Chris.Watt@waterboards.ca.gov

**Re: Comments on Proposed Resolution No. R1-2021-0006**

Dear Mr. Watt,

On behalf of the Santa Rosa Plain Groundwater Sustainability Agency (GSA), I am writing to provide input on the proposed Resolution No. R1-2021-0006 (Resolution) for consideration by the North Coast Regional Water Quality Control Board (Regional Board), recommending Priority Basins that would benefit from Salt and Nutrient Management Planning. The Regional Board's Resolution prioritizes the Santa Rosa Plain Groundwater Subbasin (Santa Rosa Plain) as "critical" for having a relatively high threat from salts and nutrients and therefore would benefit from salt and nutrient management planning. The GSA is responsible for sustainably managing groundwater in the Santa Rosa Plain and, as such, appreciates the Regional Board's efforts in protecting groundwater quality.

Given the efforts currently undertaken by the Santa Rosa Plain Subbasin GSA in developing a Groundwater Sustainability Plan (GSP), which includes the review of groundwater quality conditions and the development of sustainable management criteria for degraded water quality, it would be helpful to add into the Staff Report an acknowledgement that GSA staff and North Coast RWQCB staff are coordinating and informing each other on the aspects of various groundwater quality monitoring programs in the Santa Rosa Plain Subbasin. The GSA understands that salt and nutrient planning and management is an important aspect of groundwater protection in the Subbasin. As new monitoring programs and networks are developed and implemented in the Subbasin, the GSA will review them to identify the applicability for incorporation into future GSP updates. As such, the GSA recommends the staff report includes within the section on Adaptive Management Pathways and Potential Implementation Options some language that recognizes the need for coordination with the GSA during some of the proposed management actions, such as identification of priority zones, expansion of

groundwater monitoring, and re-evaluation of subbasin prioritization. The GSA will be collecting additional information and developing projects and management actions to ensure groundwater sustainability.

While the GSA understands the Water Board's preference for having consistent factors to apply for the prioritization effort across the entire North Coast region, factors that are based on statewide conditions or prioritization approaches may not be applicable to each basin. For example, Factor 2 of the North Coast Basin Evaluation and Prioritization assigns points to basins based on the contribution of imported water and recycled water assuming that irrigation using these sources can contribute to increased salt and nutrient loading to shallow groundwater. However, the quality of these sources can vary greatly throughout the state and for the Santa Rosa Plain Subbasin. For example, the quality of imported water delivered through Sonoma Water's Russian River system facilities is generally of much higher quality with respect to salts and nutrients compared with existing groundwater quality: the average concentration of TDS and nitrate in imported Russian River Water is 150 mg/l and 0 mg/l, respectively, and the average concentrations for TDS and nitrate in groundwater in the Santa Rosa Plain Groundwater is 290 mg/l and 1.3 mg/l, respectively (Santa Rosa Plain Subbasin Salt and Nutrient Management Plan, City of Santa Rosa, 2013). The GSA recommends that the Water Board acknowledge these conditions and remove the priority points associated with the imported water deliveries.

In addition to the comments above, the GSA supports the comments and suggestions provided by Santa Rosa Water to the Regional Board on the proposed Resolution.

Thank you for the opportunity to provide input on proposed Resolution and your efforts in protecting the Subbasin's groundwater quality.

If you have any questions, please feel free to contact Marcus Trotta ([marcus.trotta@scwa.ca.gov](mailto:marcus.trotta@scwa.ca.gov)) or Jay Jasperse ([jay.jasperse@scwa.ca.gov](mailto:jay.jasperse@scwa.ca.gov)).

Sincerely,



Andy Rodgers, Administrator  
SANTA ROSA PLAIN  
GROUNDWATER SUSTAINABILITY AGENCY