



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,

A handwritten signature in blue ink, appearing to be 'Andy Rodgers', written over a horizontal line.

Andy Rodgers, Administrator  
SANTA ROSA PLAIN  
GROUNDWATER SUSTAINABILITY AGENCY