Appendix X
Comments Received on Previous Versions of the Petaluma Valley Groundwater Sustainability Plan

PETALUMA VALLEY GROUNDWATER SUSTAINABILITY PLAN COMMENTS EXECUTIVE SUMMARY		
DATE RECEIVED	**NAME**	**COMMENTS**
9/7/2021	Robert Pennington	General comment - I recommend shortening this section where possible. A few suggestions of sections that could be shortened include: Discussion of pre-SGMA GMP; History related to basin boundary; geology section (paragraph two of HMC); water budget (perhaps methods, descriotions of climate scenarios and other details could be reserved for main body of report).

PETALUMA VALLEY GROUNDWATER SUSTAINABILITY PLAN COMMENTS SECTION 1 INTRODUCTION		
DATE RECEIVED	**NAME**	**COMMENTS**
2/7/2021	Peter Kiel	No comment
1/25/2021	Drew A Buechley	Seems fine and informative. Provided grammatcial, punctuation and style comments.
1/24/2021	Rebecca C Ng	My comments are regarding typos or word choices not content.
1/21/2021	John Shribbs	Section 1. Good description of the the processes that are going into the formation of the GSA and how it meets state requirements. Terrible description of what is groundwater, what is a GSA, what does it actually do, why does anyone care, etc. Yes we are coming up with plan but no idea what that plan is all about. Introduction should start with what a GSA does and the current need for it, why is state requiring it, etc. Lots of verbiage about process, it is dominating the whole section. Another gripe I have is the many sections about community outreach in process using surveys and social media but very little has been done to date. I doubt most citizens in Petaluma even now what GSA stands for. I have to explain to to most of the people I talk to. The process parts all say what we are going to do but not if it actually happened. Long lists of good intentions. Sounds like it was written to meet state requirements rather than be something public could read to understand what the GSA is or does.
9/7/2021	Michael Healy	p. 1-4 I wasn't aware that portions of Marin County are included in our Basin. Also, Figure 1 doesn't seem to support that, unless the boundary minimally jumps over the meanders of San Antonio Creek.

PETALUMA VALLEY GROUNDWATER SUSTAINABILITY PLAN COMMENTS SECTION 2 PLAN AREA		
DATE RECEIVED	**NAME**	**COMMENTS**
1/24/2021	Rebecca C Ng	1) The font styles and font sizes change in the document. Some areas are in the Table of Contents and bottom of page 12 and top of page 13. The Table of Contents is in a different font from the rest of the chapter. 2) 2.8 of the Table of Contents, titled "Additional GSP Elements (Reg. 354.8(g))" should be organized better and differently. Should the City of Petaluma General Plan 2025 be moved to be with the City of Petaluma General Plan in 2.6? 3) On page 4 in Section 2.2 , Table 2-1 is referenced but Table 2-1 was not provided as part of Chapter 2. 4) It is noted on page 7 in Public Water Supply Well Monitoring, that SWRCB monitors water systems that serve the public with 15 or more connections and data is available. for those. You might know that Sonoma County Environmental Health monitors State Small Water Systems with 4 - 14 connections and Transient and Nontransient noncommunity water systems. Environmental Health would probably share water quality information with the PVGWSA. 5) Spaces needed to separate words: Last sentence on page 7; first paragraph of Stormwater Management Planning, third sentence. 6) First sentence of last paragraph on page 9, "integrates" should be integrate. 7) Fourth paragraph of Water Conservation Program: ",,,new performance measures for CII water use". What is CII? 8) First sentence at top of page: spell out VOMWD. 9) In the same paragraph discussing Sonoma-Marin Saving Water Partnership within the Subbasin, why is the city of Sonoma and VOMWD in the Petaluma Valley groundwater basin and the city of Petaluma is not? 10)In section 2.7, Well and Project Permitting Policies and Procedures, the well permitting and Project permitting is repetitive. Can the project permitting section be re-written so it's not a repeat?
3/10/2021	John Shribbs	Abbreviations in figures aren't defined and are confusing Will there be a description of the figures? Generic references to studies and plans, but no analysis
9/9/2021	Chelsea Thompson	The San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) implements water quality regulations in the watershed, including establishing Total Maximum Daily Loads for pathogens and sediment in Sonoma Creek, adopting General Waste Discharge Requirements (WDRs) for vineyard discharges, and for stormwater and wastewater discharges.... **Throughout paragraph, SFGBRWQB change to SFBRWQCB** Pg 2-2. Within the Basin, UWMPs are prepared by Sonoma Water (as a wholesaler; Sonoma Water 2016) and the City of Petaluma (as a water retailer; City of Petaluma 2016). The two UWMPswere adopted in 2016 and were updated in 2021. The UWMPs discuss and describe thefollowing:...**Update UWMP reference to adopted 2020 Plan?** Pg 2-9. The Sonoma-Marin Saving Water Partnership represents 10 water utilities in Sonoma and Marin counties that are signatories to the California Urban Water Conservation Council (CUWCC) and have joined to create a regional approach to water use efficiency. Within the Basin, these utilities include the City of Petaluma and Sonoma Water. Each of these member utilities have water conservation programs to assist their communities in reducing water use. Water conservation and water use efficiency program elements specific to the Sonoma-Marin Saving Water Partnership include the following: **Update CUWCC with California Water Efficiency Partnership (CalWEP)**

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DATE RECEIVED	**NAME**	**COMMENTS**
9/7/2021	Robert Pennington	It would be useful to identify streams that are listed as critical habitat for threatened and endangered aquatic species.
COMMENTS MADE ON PRIOR COMBINED SECTIONS 1 AND 2		
DATE RECEIVED	**NAME**	**COMMENTS**
1/4/2019	Chelsea Thompson	In 2014, the State of California enacted the Sustainable Groundwater Management, including in the Petaluma Valley I don't believe there is an active USGS stream gauge on the Petaluma River. There was one at Copeland but it has been inactive since October 2016. There is no Figure 2-7b, there are two Figures labeled 2-7c. IRMWP, change to IRWMP Signatories to California Water Efficiency Partnership (CalWEP), no longer to CUWCC.

PETALUMA VALLEY GROUNDWATER SUSTAINABILITY PLAN COMMENTS SECTION 3 BASIN SETTING		
DATE RECEIVED	**NAME**	**COMMENTS**
9/7/2021	Michael Healy	The December 22, 2020 memo from Pete Parkinson discussing "Rural Residential Housing Unit Projections" is outdated, in that it does not include the County's (very high) draft RHNA allocations for the unincorporated area. I realize the County has appealed, seeking to reduce that allocation by half. The appeal is unlikely to succeed, but even half of the draft allocation would mean a lot more units than what is discussed in Pete's memo.
9/7/2021	Robert Pennington	"Interconnected surface waters are defined in the GSP Regulations as "surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted." ~~A stream segment is interconnected where (and when) the groundwater water table elevation equals or exceeds the streambed elevation."~~ See strike out above. This statement is inconsistent with the preceding definition interconnected surface water, and inconsistent with text lower down in the same paragraph. If groundwater levels must be at or above the stream, then interconnected-losing streams would not be considered interconnected.

PETALUMA VALLEY GROUNDWATER SUSTAINABILITY PLAN COMMENTS SECTION 4 SUSTAINABLE MANAGEMENT CRITERIA		
DATE RECEIVED	**NAME**	**COMMENTS**
8/9/2021	John Shribbs	Section 4.5.2.1. "As indicated in Table 4-5-1, minimum thresholds for three of the 12 RMPs represent the calculate d well impact depths (i.e., at these locations the well impact depth is shallower than the historical low with the drought factor and is considered more protective of beneficial users). At the nine remaining RMPs the minimum thresholds based on the historical lows minus the drought factor were determined to be above (i.e., protective of) the calculated well impact depths." This is a paragraph below the table 4.5.1. Data is referenced but do not know which datapoints. Do you really expect reader know which datapoints? Which are in the set of 12 and which are in the set of 9? You need to put in an example. Too many variables in equation to understand the process or calculation Section 4.5.2.4. AG users section: Do we really know all the crops and farmers in the "Baylands" area and how they are using water? Reference is made to Fig 2-5 of the Plan Area but could not find immediately. Needs to be separate map inside the paragraph for easy reference. Section 4.5 to 4.7:Lots of repetitive ideas seems redundant. Yes there are impacts and if one factor goes bad, yes others can go bad too. but this whole section is burdensome. When is there no impact? Really amorphous on measuring impacts described. Lots of possibilities without definition. So what if there is an impact? What is GSA going to do about it? Do more studies? When does action kick in? Section 4.8: N and As and TDS mentioned and monitored. I have heard Hg is a concern in the Bay area. Will we test for Hg? Section 4.10: "Key themes and outcomes from work group members that assisted in developing the SMC 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. Variable levels of correlation between simulated streamflow depletion and groundwater levels, a lack of existing instream flow targets, and limited data for assessing the presence of any historically significant and unreasonable conditions complicate the development of this SMC. 2)An additional complication is that depletions of surface water can be caused by diversions under surface water rights (e.g., direct surface water diversions or wells pumping under appropriative or riparian rights) that are outside the jurisdiction of SGMA and the GSAs . Therefore, the cause of the depletion must be evaluated to assess if such depletions are caused by diversions under the jurisdiction of the GSA. Empirical data are not currently available" Reference to appendix 4-10-1 not clear on what is documented. Lots of backpedaling here. Need to reference actual surface waters that could be impacted or do impact on groundwater. How many ag ponds and creeks are involved? The marshlands are part of surface water. Will marsh or creek habitats be affected if gw is depleted? Overall: I get lost in the generalities and repetitiveness. Better to state those things outside the repetitive pattern or highlight them in some way.
8/8/2021	Rebecca Ng	Section 4 put everything together. It was good to see how everything was connected. I have no comments on anything except I could not find Figure 4-7-1.

PETALUMA VALLEY GROUNDWATER SUSTAINABILITY PLAN COMMENTS SECTION 4 SUSTAINABLE MANAGEMENT CRITERIA		
DATE RECEIVED	**NAME**	**COMMENTS**
		I understood everything except one sentence and nee someone to explain to me. Page 35, the third bullet: Degraded water quality. The seawater intrusion minimum thresholds may have a beneficial impact on groundwater quality by preventing increases in chloride concentrations at supply wells.
8/9/2021	Heidi Bauer	The only comment/question I have is on the Table on Page 13 – shouldn't an undesirable result from depletion of interconnected surface waters also include negative impacts to GDE's?
9/7/2021	Robert Pennington	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. I suggest creating a table that specifies the date ranges or definitions of "recent" and "historic" for RMPs with various trends.

PETALUMA VALLEY GROUNDWATER SUSTAINABILITY PLAN COMMENTS SECTION 5 MONITORING PLAN		
DATE RECEIVED	**NAME**	**COMMENTS**
9/7/2021	Rebecca Ng	I have a question about multi-level monitoring wells that is intended for installation for groundwater monitoring and seawater intrusion. My assumption is that multi-level wells will be screened in different aquifers. Is that correct? I also assume it is less expensive to construct multi-level wells rather than multiple wells. Would the multi-level wells present potential cross contamination between aquifers? It was also stated somewhere in the document that wells should not screened in different aquifers. Please explain.
8/27/2021	John Shribbs	Somewhere I missed the explanation of the difference between the "watershed" and the "contributing watershed" which excludes San Antonio Creek and area west of the lower river. Where do I find this explanation? Also some of the upper area of the east side seem to be excluded since does not seem exact match with watershed map //sonomarcd.org/district-watersheds/petaluma-river/ Will there be a Section 8 on the impact on ecosystems or is that a separate report? I thought that was going to be large stand alone section or report. Fig 5.5: Seems like dots on map are for surface water. Are some well water? Do we not have to separate water quality from well water vs. surface water? Surface water quality could be coming from other sources than groundwater. Need to tighten up process of investigation if X wells or Y surface water start to so lower water quality. May need to repeat what we mean by "water quality" since there are so many parameters resulting in low quality. E.g. if N shows up in wells vs. surface water, will investigation take a different course of action? 5.2.4. SWI-- I counted 9 wells but three together should count only as one. All are public wells. Are they all in operation and being sampled at least monthly, or how often? 5.3.2 the map shows a symetric grid of "pts.". Are these wells? Why the grid cluster? Why are these wells or points not spread throughout the basin like other monitoring wells? If we have these grid spaced wells monitoring, why not use them for other factors if they are good enough for water quality? App 5-b (example hydrographs) Not sure why these graphs included. Where is the explanation for these graphs? Hard to fathom what they mean just by looking at them. Usually there is enough added caption text to explain what we are looking at and why we should look at them, take away concept. Overall this section looks good.

PETALUMA VALLEY GROUNDWATER SUSTAINABILITY PLAN COMMENTS SECTION 6 PROJECTS AND MANAGEMENT ACTIONS		
DATE RECEIVED	**NAME**	**COMMENTS**
9/8/2021	Andy Rodgers	The draft section represents what the advisory committee has been talking about. The section is well organized and clearly written. The only addition that occurred to me after reading is to consider the GSA providing some basic well maintenance, management, and best practices education. This could be valuable to have the GSA host and promote on-going workshops with experts and local drillers/pump companies to empower well owners to understand well construction, pump and storage practices, and water quality considerations and treatment options. Also could have Permit Sonoma discuss well and abandonment permitting overview etc.
8/31/2021	Rebecca Ng	Missing acronyms for Sect 6 & 7: ECWRF, IRWM, LID, MGD, NBWRA, NBWRP, NCRWQCB (add North Coast) 6.2.2.4 .also other pages in the section: acronyms are not being identified when the term is first used. Some of the acronyms are not included in the list of acronyms and abbreviations. (See above) Some acronyms in section 6.2.2.4: DWR IRWM grant funding; NBWRP; NBWRA; MGD. Also LID used on page 6.3. The section needs editting.
9/9/2021	Chelsea Thompson	Existing wastewater treatment and recycled water production occur at the SVCSD WWTP in compliance with Order No. R2-2016-0014 (NPDES Permit No. CA0037810) issued by the San Francisco Bay RWQCB. It is anticipated that future expansion of recycled water deliveries would also occur under this or future revised or amended orders. **Has SVCSD been spelled out in document?** **6.2.2.4 Estimated Costs and Funding Plan** The City is a member of North Bay Water Reuse Authority (NBWRA), a regional water recycling and management initiative which covers areas north of the San Francisco Bay. The NBWRP is comprised of member agency recycled water projects, including City of Petaluma projects. Through NBWRA, the City continuously pursues funding opportunities for its projects included in NBWRP Phase 2. The planned expansion of the recycled water system is separated into three parts. **NBWRP to NBWRA**

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		6-10 first paragraph - weather conditions (i.e., the summer and fall seasons) or emergency situations. The Groundwater Banking Feasibility Study (GEI, 2013) provided an evaluation of the regional needs and benefits, source water availability and quality, regional hydrogeologic conditions, and alternatives for groundwater banking. Prior to implementing long-term ASR programs, pilot studies are recommended to verify location specific feasibility, including aquifer capacity for recharge and recovery operations and geochemical compatibility. Pilot testing involves injecting potable drinking water into the Basin's aquifers and recovering it to assess injection and recovery capacities and monitor potential water quality impacts to native groundwater resources. Information generated by pilot test evaluations will help inform the degree to which ASR is a feasible strategy to improve the reliability water supply, along with helping to evaluate whether or not an ASR project can be developed and operated in a manner that will achieve both supply reliability and groundwater sustainability benefits. In 2018 a successful pilot study project was completed in the nearby Sonoma Valley Subbasin which provides information that can inform future ASR planning within the Basin (GEI, 2020). **Reliability (of) water supply** The State Water Resources Control Board (SWRCB) has recognized **that it in the best** interest of the state to develop a comprehensive regulatory approach for ASR projects, and has adopted general waste discharge requirements for ASR projects that inject drinking water into groundwater (Order No. 2012-0010-DWQ or ASR General Order). The ASR General Order provides a consistent statewide regulatory framework for authorizing both pilot ASR testing and permanent ASR projects. Pilot tests and any future permanent ASR facility will be permitted under the ASR General Order. Oversight of these regulations is done through the Regional Water Quality Control Boards (RWQCBs) and will require project proponents to comply with the monitoring and reporting requirements of the ASR General Order. Any additional permits required for the construction and operation of an ASR facility will be obtained by the lead agency for each ASR project as needed. **CORRECT 'THAT IT (IS) IN THE BEST** 6.2.2.3 Public Noticing, Permitting and Regulatory Process: Public notice for aspects of the recycled water projects will be carried out by the lead agency, which is anticipated to be the City of Petaluma. For recycled water projects where the GSA is not the lead agency, the GSA will provide support for outreach activities to nearby well owners and the local community. As noted above, compliance with the California Environmental PVGSP Section 6 PMAs 6- 6 v08252021 Quality Act (CEQA) is incorporated into the existing EIR for the Phase 2 North Bay Water Reuse Project. Any additional recycled water projects would be included in future CEQA analysis, as[1]needed. Existing wastewater treatment and recycled water production occur at the SVCSD WWTP in compliance with Order No. R2-2016-0014 (NPDES Permit No. CA0037810) issued by the San Francisco Bay RWQCB. It is anticipated that future expansion of recycled water deliveries would also occur under this or future revised or amended orders. **UPDATE WITH: Ellis Creek Water Recycling Facility (ECWRF) and Order R2-2021-0008 (NPDES Permit No. CA0037810)**
9/9/2021	Chelsea Thompson	6.2.2.5 Legal Authority: As described above, the **SVCSD** has the legal authority to treat wastewater and deliver recycled water for irrigation uses.

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9/7/2021	Robert Pennington	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

PETALUMA VALLEY GSP SECTION 7 -- IMPLEMENTATION PLAN		
DATE RECEIVED	**NAME**	**COMMENTS**
9/10/2021	Eugene Cammozi	7.2.8 (Estimate of 5-year implementation costs) I feel the budget is excessive for the Petaluma Basin. There are only about 14 to16 monitoring wells to keep of, especially for a basin that has been in balance for the last 50 years, and is estimated to be so in the future. I feel the Board of Supervisors needs to look into this and ask some serious questions. In addition, it is unclear who will be paying for the budget, but my hope is that the cost is planned to be spilt three ways: among city, rural residential, and commercial agriculture.
8/31/2021	Rebecca Ng	7.2.3: There is a reference to Section 7.1.4. There is no Section 7.1.4. 7.2.4.2: Interconnected Surface water subsection, 3rd bullet needs editing as it is incomplete. 7.3.2: It is stated that in August 2022, a consultant was engaged to conduct a fee study yet it is stated somewhere else that the fee will be in place by June 30, 2022.
9/7/2021	Robert Pennington	I do not see discussion of the GSA reviewing and responding to: General plan amendments; other local policies related to groudnwater resources; 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.