

# Section 1: Introduction

## Groundwater Sustainability Plan for Santa Rosa Plain Groundwater Subbasin

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# 1 INTRODUCTION

In 2014, the State of California enacted the Sustainable Groundwater Management Act (SGMA), which substantially changes the way groundwater is managed in California. This law requires that groundwater basins and subbasins in California designated as medium- or high-priority by the California Department of Water Resources (DWR) under SGMA be managed sustainably.<sup>[1]</sup> Satisfying the requirements of SGMA generally involves four basic activities that must be completed by local agencies:

1. Forming one or more Groundwater Sustainability Agencies (GSAs) to fully cover the high- or medium-priority basin/subbasin.
2. Developing one or multiple Groundwater Sustainability Plans (GSPs) that fully cover the SGMA high- or medium-priority basin/subbasin.
3. Implementing the GSP and managing to achieve quantifiable objectives and sustainability within 20 years of GSP adoption.
4. Regularly reporting data and GSP progress to the DWR.

The Santa Rosa Plain Groundwater Subbasin (Subbasin), designated as basin number 1-55.01 in DWR's Bulletin No. 118 (DWR 2016a), and shown on **Figure 1-1**, is categorized as a medium-/high-priority basin by DWR (DWR 2020) and is, therefore, required to comply with SGMA.

## 1.1 Purpose of Groundwater Sustainability Plan

The purpose of this document is to fulfill the GSP requirement and present a path for sustaining groundwater resources in the Subbasin pursuant to the provisions of SGMA. Primary objectives addressed by this GSP are to:

- Meet the requirements of SGMA and DWR's GSP Emergency Regulations (GSP Regulations) by establishing criteria and management actions that will achieve and maintain sustainable groundwater management in the Subbasin within 20 years of GSP adoption.
- Incorporate the best available scientific and technical information by building on the strong technical foundation established through previous technical studies and voluntary groundwater management activities in the Santa Rosa Plain.

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<sup>[1]</sup> DWR prioritizes groundwater basins as critically overdrafted, high-, medium-, low-, and very low-priority based on a variety of technical factors. Refer to <https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization>.

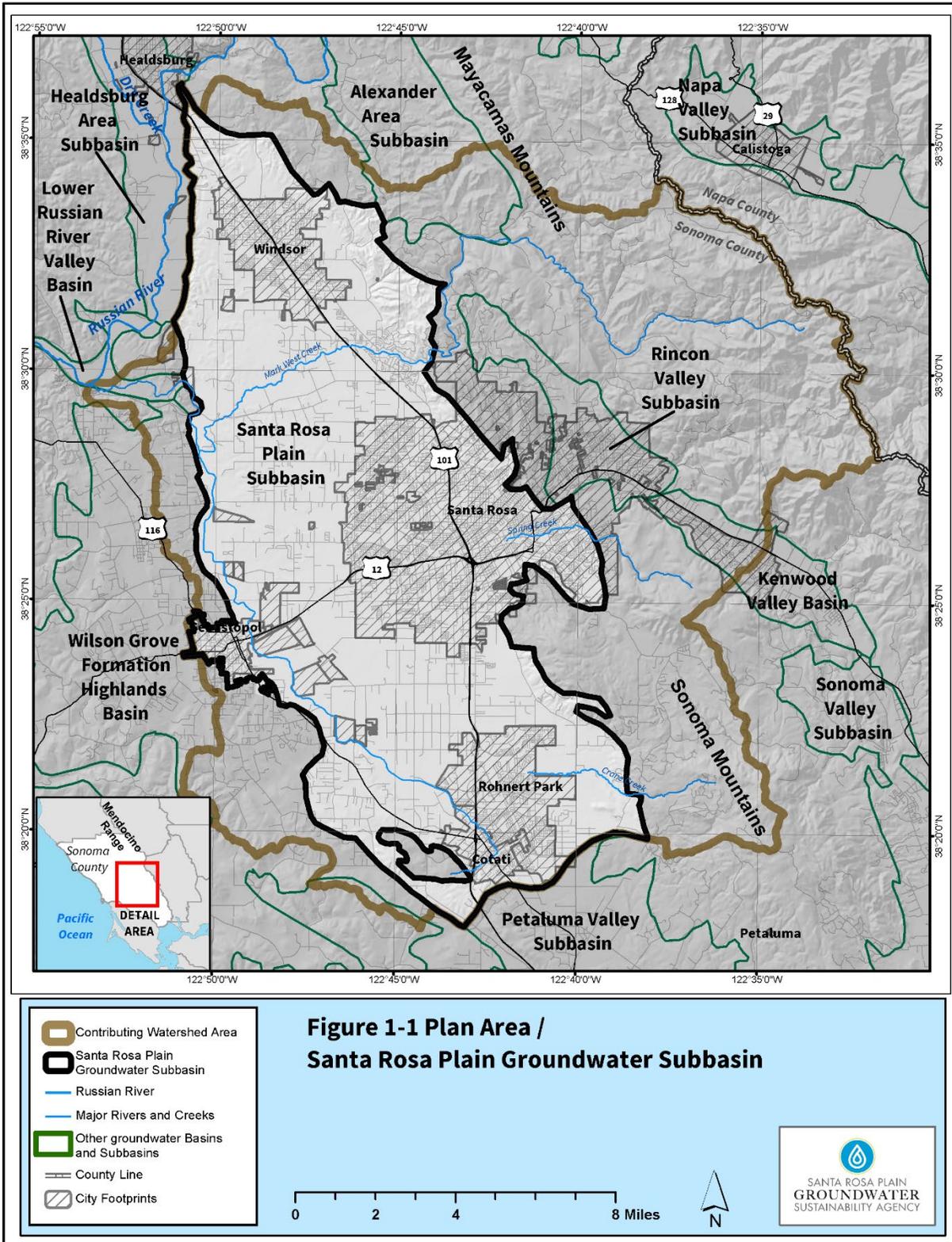


Figure 1-1. Plan Area/Santa Rosa Plain Groundwater Subbasin

- Integrate the perspectives and interests of the many diverse users and uses of groundwater resources within the basin through a process that provides opportunity for significant public and community engagement. Hundreds of comments were received and considered during multiple phases of revising the GSP (**Appendix 1-A**).
- Leverage the limited available funding and local resources through continued regional coordination and information sharing with other local entities and GSAs.

The development of this GSP benefits from a recent history of collaborative groundwater management and water-resource planning by local stakeholders, which had focused on addressing groundwater sustainability issues in the Subbasin prior to the passage of SGMA.

The purpose of the GSP is not to tackle water supply risk and resilience issues or prepare emergency response plans for community drinking water systems. The America’s Water Infrastructure Act (AWIA) of 2018 requires community drinking water systems to develop or update risk assessments and emergency response plans to identify vulnerabilities, including malevolent acts and natural disasters, such as floods and droughts, that may potentially threaten the ability of community water systems to deliver safe drinking water.

The Santa Rosa Plain GSA, in collaboration with Sonoma Water, other Sonoma County GSAs, and local water suppliers, has and will continue to provide information to the local community on the severe multi-year drought occurring during the preparation of this GSP and other droughts in the future, including, but not limited to:

- News releases on the status of historically low surface water reservoir supplies
- Messaging to encourage communities to change everyday habits and adapt to eliminate water waste, and to conserve and reduce water usage by 20 percent
- Participation in public workshops on drought conditions and what the community can do to help address this issue

The GSAs do have the authority to mandate conservation and manage extractions but ultimately cannot affect water rights under SGMA. While California’s Human Right to Water (California Water Code 106.3) does not apply to the Santa Rosa Plain GSA (which does not provide drinking water and is not a state agency), the GSP is developed to be protective of both groundwater levels and groundwater quality for all beneficial users including residential well owners and disadvantaged communities (DACs). By addressing all beneficial uses and users, the GSP has addressed California’s Human Right to Water.

## 1.2 Guide to the Groundwater Sustainability Plan

The Santa Rosa Plain GSP is organized sequentially, starting with a high-level overview of the Subbasin (**Section 2**), and drilling into more details on hydrology, geology, and the current and projected groundwater conditions (**Section 3**). A discussion of what sustainability means locally is provided in **Section 4**, and **Section 5** details how sustainability will be monitored over time.













Requirement	GSP Section
(k) Processes to review land use plans and efforts to coordinate with land use planning agencies to assess activities that potentially create risks to groundwater quality or quantity.	7
(l) Impacts on groundwater-dependent ecosystems.	4
<p><b>10727.8. PUBLIC NOTIFICATION AND PARTICIPATION; ADVISORY COMMITTEE</b></p> <p>(a) Prior to initiating the development of a GSP, the GSA shall make available to the public and the department a written statement describing the manner in which interested parties may participate in the development and implementation of the GSP. The GSA shall provide the written statement to the legislative body of any city, county, or city and county located within the geographic area to be covered by the GSP. The GSA may appoint and consult with an advisory committee consisting of interested parties for the purposes of developing and implementing a GSP. The GSA shall encourage the active involvement of diverse social, cultural, and economic elements of the population within the groundwater basin prior to and during the development and implementation of the GSP.</p>	1.2, 1.3, Appendix
(b) For purposes of this section, interested parties include entities listed in Section 10927 that are monitoring and reporting groundwater elevations in all or a part of a groundwater basin managed by the GSA.	NA
<p><b>10728. ANNUAL REPORTING BY GROUNDWATER SUSTAINABILITY AGENCY TO DEPARTMENT</b></p> <p>On the April 1 following the adoption of a GSP, and annually thereafter, a GSA shall submit a report to the department containing the following information about the basin managed in the GSP:</p> <p>(a) Groundwater elevation data</p> <p>(b) Annual aggregated data identifying groundwater extraction for the preceding water year</p> <p>(c) Surface water supply used for or available for use for groundwater recharge or in-lieu use</p> <p>(d) Total water use</p> <p>(e) Change in groundwater storage</p>	7.0
<p><b>10728.2. PERIODIC REVIEW AND ASSESSMENT</b></p> <p>A GSA shall periodically evaluate its GSP, assess changing conditions in the basin that may warrant modification of the plan or management objectives, and may adjust components in the GSP. An evaluation shall focus on determining whether the actions under the GSP are meeting the plan's management objectives and whether those objectives are meeting the sustainability goal in the basin.</p>	7.0
<p><b>10728.4. ADOPTION OR AMENDMENT OF PLAN FOLLOWING PUBLIC HEARING</b></p> <p>A GSA may adopt or amend a GSP after a public hearing, held at least 90 days after providing notice to a city or county within the area of the proposed plan or amendment. The GSA shall review and consider comments from any city or county that receives notice pursuant to this section and shall consult with a city or county that requests consultation within 30 days of receipt of the notice. Nothing in this section is intended to preclude an agency and a city or county from otherwise consulting or commenting regarding the adoption or amendment of a plan.</p>	1.3, 7.0
<p><b>10728.6. CEQA NOT APPLICABLE TO PLAN PREPARATION AND ADOPTION</b></p> <p>Division 13 (commencing with Section 21000) of the Public Resources Code does not apply to the preparation and adoption of plans pursuant to this chapter. Nothing in this part shall be interpreted as exempting from Division 13 (commencing with Section 21000) of the Public Resources Code a project that would implement actions taken pursuant to a plan adopted pursuant to this chapter.</p>	5

Note:

CEQA = California Environmental Quality Act

### **1.3 Groundwater Sustainability Agency Authorities and Administrative Information**

#### **1.3.1 Santa Rosa Plain Groundwater Sustainability Agency**

SGMA requires GSAs to be formed to cover basins/subbasins designated by DWR as high- or medium-priority (based on a variety of technical factors). Any local agency that has water supply, water management, or land use responsibility in a groundwater basin is eligible to form a GSA. The legislative intent of SGMA is to encourage GSA-eligible agencies to form one GSA that covers an entire SGMA basin/subbasin and prepare one GSP; however, SGMA offers local agencies the flexibility of forming multiple GSAs and preparing multiple GSPs in a basin/subbasin. SGMA empowers GSAs with new management tools and authorities to, among other things:

- Register groundwater wells
- Collect data/conduct studies
- Measure extractions (with the exception of de minimis wells that pump less than 2 acre-feet per year [AFY])
- Require reporting
- Manage extractions
- Assess fees

The Santa Rosa Plain GSA was formed to meet SGMA requirements in June 2017, and is one of three GSAs established in Sonoma County (the other two are Petaluma Valley and Sonoma Valley). The jurisdictional area of the Santa Rosa Plain GSA is the entire Santa Rosa Plain Subbasin, and no other GSAs have jurisdiction within the Subbasin. The Santa Rosa Plain GSA was formed through a Joint Exercise of Powers Agreement (JPA) entered into by the cities of Cotati, Rohnert Park, and Santa Rosa; the Town of Windsor; Gold Ridge Resource Conservation District; Sonoma County; Sonoma County Water Agency (Sonoma Water); Sonoma Resource Conservation District (RCD); and an organized group of Mutual Water and Public Utilities Commission-Regulated Companies (Independent Water Systems), in accordance with requirements of CWC Section 10723 for establishing GSAs under the SGMA.

In August 2019, the JPA was amended to include the City of Sebastopol and three neighboring mutual water companies (Fircrest, Belmont Terrace, and Kelly), following an adjustment of the Subbasin boundaries. The boundary change was a result of DWR's proposed 2018 reprioritization of the neighboring Wilson Grove Formation Highlands Basin (Wilson Grove) from very low-priority to medium-priority. Entities within Wilson Grove were concerned about their ability to comply with SGMA, and the cities of Sebastopol and Petaluma, the three mutual water districts, and the County of Marin made jurisdictional requests to DWR to change the basin boundaries. DWR authorized the boundary changes. As a result, Sebastopol and the water companies are now solely within the Santa Rosa Plain Subbasin. (Petaluma and a portion of Marin County are now within the Petaluma Valley Basin.)

A copy of the resolution forming the JPA and the resolution revising the JPA is included in **Appendix 1-B**.

### **1.3.2 Santa Rosa Plain Groundwater Sustainability Agency Board and Advisory Committee**

The Santa Rosa Plain GSA is governed by 10 Board members and alternates from the member organizations, which each appoint one member and one alternate member (Board members are listed in **Appendix 1-C**). The Santa Rosa Plain GSA Board (GSA Board) members are elected or appointed members of their governing bodies who serve at the pleasure of the member organization appointing them. GSA Board members annually elect the officers of the Board for 1-year terms, which may be extended to multiple consecutive terms. The GSA Board role in the GSP development process is to provide guidance and direction on key components of the GSP and consider recommendations from the Santa Rosa Plain GSA Advisory Committee (Advisory Committee) and input from the public. The GSA Board is responsible for adopting the GSP and authorizing its submission to DWR for evaluation, assessment, and approval.

The Santa Rosa Plain GSA formed an Advisory Committee of 18 members in October 2017 consisting of members appointed by each of the original 9 member agencies, the City of Sebastopol and the Federated Indians of Graton Rancheria, and 7 interest-based members appointed by the Santa Rosa Plain GSA Board. The seven interest-based members are composed of the following groups:

- Environmental (from organizations with a presence in the Basin) (two members)
- Rural residential well owners (two members)
- Business community (one member)
- Agricultural (two members)

As described in **Section 2.1**, the DACs in the Subbasin are generally (although not entirely) located in areas that receive water from municipal-water suppliers, which rely primarily on surface water (not groundwater). However, the Sonoma Water appointee to the Advisory Committee was chosen to represent the DACs and participates from that perspective. As described in **Section 1.4.2.1**, government-to-government outreach was conducted from the County to Tribes when the Santa Rosa Plain GSA was formed. The Federated Indians of Graton Rancheria chose to participate on the Advisory Committee. During the implementation phase of the GSP, federally and non-federally recognized Tribal governments will be contacted to reassess their interest in participating in GSA activities.

The role of the Advisory Committee during the GSP development process is to work toward a consensus and incorporate community and stakeholder interests into recommendations to the GSA Board on GSP development and SGMA implementation. Advisory Committee members also report to, and seek input from, their larger constituency groups on key components and proposals related to GSP development.

The Advisory Committee meets 6 to 10 times annually, and the meetings are open to the public. The Advisory Committee makes recommendations to the GSA Board that reflect the outcome

of committee discussions. To ensure that all viewpoints are heard and considered by the Board, the Advisory Committee reports to the GSA Board regularly, identifying areas of agreement and disagreement among the Advisory Committee members. The names of GSA Board and Advisory Committee members can be found in **Appendix 1-C**, and the Advisory Committee Charter is provided in **Appendix 1-D**.

### **1.3.3 Groundwater Sustainability Agency Coordination**

Implementation of SGMA in the Subbasin is closely coordinated with neighboring GSAs in Petaluma Valley and Sonoma Valley, as well as local agencies with land use responsibilities, including the cities of Cotati, Rohnert Park, Santa Rosa, Sebastopol, Town of Windsor, and the County of Sonoma. In addition to close coordination when managing and monitoring along shared Subbasin boundaries, resources are leveraged and shared by the three existing GSAs in Sonoma County to maximize efficiencies, including shared templates and methodologies for certain GSP components, outreach resources, grant opportunities, and the development of data management system tools and technologies.

The Santa Rosa Plain GSA has a service agreement with Sonoma Water for technical support, public outreach and community engagement, and grant writing and management. The GSA also has service agreements with outside firms for administrative support, legal advice, financial decision making, and facilitation services for Advisory Committee meetings.

Contact information for the Santa Rosa Plain GSA is:

Santa Rosa Plain Groundwater Sustainability Agency  
2235 Mercury Way #105, Santa Rosa California 95407  
[www.santarosaplainingroundwater.org](http://www.santarosaplainingroundwater.org) (707) 243-8555

GSA Administrator: Andy Rodgers, West Yost Associates, Inc.

GSA Plan Manager: Jay Jasperse, Chief Engineer and Director of Groundwater Management, Sonoma County Water Agency

## **1.4 Stakeholder Engagement and Communication**

SGMA requires that GSAs consider the beneficial uses and users of groundwater. As a result, GSP development included robust outreach and stakeholder engagement through a variety of methods and tools, which are described in detail in **Sections 1.4.2.1** through **1.4.2.3**.

As described in **Section 1.3**, the Santa Rosa Plain GSA is governed by a local board, which receives and considers recommendations from an Advisory Committee representing multiple stakeholder interests. Both the GSA Board and Advisory Committee hold regular public meetings in compliance with California's laws governing public meetings (commonly known as the Brown Act). A list of meetings is provided in **Appendix 1-E**.

All phases of SGMA compliance in the Santa Rosa Plain Groundwater Subbasin have been, and will continue to be, characterized by an open collaborative process with strong stakeholder

engagement, providing stakeholders and the public with opportunities to provide input and to influence the process. Information is available on the website, <https://santarosaplaingroundwater.org>, where all meeting materials and notifications are posted.

#### **1.4.1 Beneficial Uses and Users of Groundwater**

SGMA requires GSAs to identify and consult with people and agencies who represent the “beneficial uses and users of groundwater in the basin, including the land uses and property interest potentially affected by the use of groundwater in the basin” (California Code of Regulations [CCR] Section 354.10). **Appendix 1-F**, *The Community Engagement Plan for Development and Adoption of a Groundwater Sustainability Plan* (Santa Rosa Plain GSA 2018), identifies beneficial users and uses as “interested parties” that include water suppliers, agricultural users, business and commercial uses, rural residential well owners, DACs, state and local landowners, and environmental users.

As described in **Section 1.3**, many of these beneficial users and those engaged in beneficial uses are included on the GSA Board or the Advisory Committee. Specific information regarding consultation with representatives of beneficial users and uses is described in the following sections.

#### **1.4.2 Implementation of the Sustainable Groundwater Management Act – Phases of Work**

Outreach for SGMA is associated with the following four work phases:

- **Phase 1: GSA Formation and Coordination** – The formation of the Santa Rosa Plain GSA began in 2015, with an initial stakeholder assessment conducted by the Consensus Building Institute (CBI), followed by negotiations between GSA-eligible entities in the Subbasin. This phase was completed in June 2017, when the GSA was created by a JPA (described in **Section 1.2**).
- **Phase 2: GSP Preparation and Submission** – This phase of work began in 2018 and will be completed in January 2022. During this phase, outreach was largely guided by a Community Engagement Plan (Santa Rosa Plain GSA 2018) (**Appendix 1-F**). Pre-submission, the final draft GSP was released for public comments and review.
- **Phase 3: GSP Review and Evaluation** – This phase began in 2019, with the majority of the review taking place in 2021. This phase will continue through 2022, when the GSP is submitted and DWR provides additional opportunity for additional public review and comments.
- **Phase 4: Implementation and Reporting** – Following the submission of the GSP to DWR, the Santa Rosa Plain GSA will begin implementing projects and programs to reach sustainability in the Subbasin. This will be an ongoing phase, with 5-year updates that will include public input and feedback, as the GSA strives for sustainability by 2042.

#### 1.4.2.1 Phase 1: Groundwater Sustainability Agency Formation and Coordination

From 2015 through 2017, local agencies worked with the CBI to facilitate the formation of the Santa Rosa Plain GSA. CBI began by conducting a stakeholder assessment in the three Sonoma County basins and subbasins (Santa Rosa Plain Subbasin, Petaluma Valley Basin, and Sonoma Valley Subbasin) that were immediately subject to SGMA implementation. Assessment results were described in *Findings and Recommendations on Implementing the Sustainable Groundwater Management Act in Sonoma County (Appendix 1-F)*.

The assessment included interviews with and surveys of representatives of key stakeholder groups. During the assessment phase, the County of Sonoma sent government-to-government letters to federally recognized Tribes within the three basins and subbasins, and the Federated Indians of Graton Rancheria chose to participate on the Santa Rosa Plain Advisory Committee. The stakeholder assessment resulted in recommendations for a transparent and inclusive process for local implementation of SGMA and also recommended that separate GSAs be created for each of the three basins/subbasins to reflect the local basin characteristics and stakeholder concerns. Other findings include the following:

- There is an overall commitment to long-term sustainable groundwater management and the importance of groundwater-surface water interaction, conjunctive use, and integrated water-resources management.
- Respondents respect local knowledge and control for water management and expressed concern about (1) needing to participate in management decisions for other basins and (2) having agencies or stakeholders from external jurisdictions making decisions about local groundwater. At the same time, some recognize a need for a regional perspective on water resources and land use; those with this perspective feel confident that regional considerations can blend with local decisions.
- Agencies expressed concerns about costs and funding SGMA implementation.
- Stakeholders demonstrated a high level of expectation for public outreach and stakeholder involvement. Respondents urged expansive outreach to rural residential well owners and those seeking guidance and input from basin advisory panels and the public on forming the GSA.

The assessment prescribed a process for input and decision making which involved representatives of the GSA-eligible entities in the Subbasin. The process was implemented, and included community forums that were held in 2016 to receive and consider input from the public on GSA formation.

Some areas of the Subbasin are classified as DACs by the DWR (DWR 2021a), the Sonoma County Transportation Authority (SCTA 2017), and Sonoma County Department of Health Services (2014). Representatives of DAC stakeholders were included in the assessment survey, or were separately interviewed by staff during the GSA formation process.

The beneficial uses and users of the Subbasin, as defined by SGMA (CWC Section 10723.2), are represented in the structure of the GSA Board and the Advisory Committee. GSP beneficiaries include private domestic well owners, agriculture, businesses, municipal public water systems, DACs, and environmental users.

Stakeholders on the GSA Board and Advisory Committee include representatives from municipal-water suppliers, agriculture, environmental organizations, businesses, rural well owners, and at-large community members. Refer to **Section 1.2** for additional information about GSA Board and Advisory Committee composition.

#### **1.4.2.2 Phase 2: Preparation and Submission**

The GSA Board and Advisory Committee were actively engaged in the development of the GSP, including:

- Reviewing and commenting on GSP sections as they were prepared
- Providing feedback and suggestions for SMC (discussed in **Section 4** of this GSP)
- Actively engaging and soliciting feedback from the stakeholders they represent

All meetings were publicly advertised and conducted in accordance with California’s Ralph M. Brown Act and other public meeting laws (beginning at Government Code 54950). Meetings held during the pandemic were advertised and conducted in accordance with Governor Newsom’s Executive Orders N-25-20 issued on March 3, 2020 and N-29-20, issued on March 4, 2020. Public comment was included on every item, and meeting minutes were taken and are available via the website.

Broader public input was determined to be a critical component of GSP development, and was guided by the *Community Engagement Plan for Development and Adoption of a Groundwater Sustainability Plan Santa Rosa Plain Groundwater Sustainability Agency* (Santa Rosa Plain GSA 2018) (**Appendix 1-F**), which was adopted by the Board in January 2018. To encourage stakeholder engagement, key outreach tools included:

- Development of an Interested Parties List through both meeting attendance and by soliciting the public to sign-up via the website
- Monthly informational emails to the Interested Parties list that provided information regarding SGMA implementation, GSP planning, and groundwater management
- Development of a website with meeting information and GSP materials, including a location for public comments as draft GSP sections were released
- Public forums on the SGMA implementation process, subbasin conditions, SMC development, draft SMCs, and the draft GSP
- Forums coordinated with the other Sonoma County GSAs on cross-cutting issues, including climate change modeling (as discussed in **Appendix 3-E**) and groundwater recharge

- Presentations to and discussions with key stakeholder groups in the Subbasin, including the Sonoma Water Coalition (a countywide coalition of environmental groups), environmental stakeholder groups, cannabis growers, the Sonoma County Farm Bureau's water committee, the Sebastopol Grange, and organizations serving DACs, including California Human Development, Latino Service Providers, and Los Cien
- A survey mailed to all domestic well owners in the basin, in both English and Spanish, assessing their priorities regarding groundwater sustainability and identifying key issues related to groundwater resources
- Focus groups, including a basin-wide group, a DAC group that included representatives from the other Sonoma County basins, and an agricultural focus group
- A campaign targeted to informing domestic well owners, including a website revision, social media messaging, newspaper ads, and lawn signs
- Participation in 2021 Drought-Drop-By events, where groundwater users were provided with information about the GSP along with a water-saving toolkit

During the pandemic, outreach continued through these activities. Regular GSA Board and Advisory Committee meetings, and two community meetings, were held virtually.

#### **1.4.2.3 Phase 3: Groundwater Sustainability Plan Review and Evaluation**

Phase 3 began in 2019, with the majority of the review occurring in 2021. During this phase, sections of the draft GSP were released sequentially to the GSA Board, Advisory Committee, and public for comments. In addition, the draft GSP was posted on the website and made available at regional libraries and all city and town halls in the Subbasin. During the 30-day review period, 20 comments were received from 15 individuals or organizations. All comments submitted through the various Advisory Committee, GSA Board, and public reviews are available in **Appendix 1-A**. During the public comment period, a community workshop attended by approximately 45 people provided an overview of GSP content. In addition, a Board meeting held during the comment period allowed the public the opportunity to provide verbal comments and feedback.

Public comments were incorporated into the GSP as appropriate, and the final GSP will be considered by the GSA Board in early December.

Following submittal to DWR, there will be a 75-day comment period through DWR's SGMA portal at <http://sgma.water.ca.gov/portal/>. Comments will be posted to the DWR website prior to the state agency's evaluation, assessment, and approval.

#### **1.4.2.4 Phase 4: Implementation and Reporting**

Phase 4 will continue through the duration of the 50-year planning window to ensure that sustainability is achieved and maintained, and that the activities, programs, and policies of the GSA are transparent and inclusive. Both the GSA Board and Advisory Committee will continue

to meet, and the Advisory Committee's scope and purpose will be refined to focus on GSP implementation. Tribal governments will be contacted to reassess their interest in participation in the GSA and in the implementation process.