



Santero Way Specific Plan Update Project

Water Supply Assessment

prepared for

City of Cotati

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Acronyms

AF	acre-feet
AFY	acre-feet per year
ASR	aquifer storage and recovery
CEQA	California Environmental Quality Act
CWC	California Water Code
DOF	Department of Finance
DWR	Department of Water Resources
EIR	Environmental Impact Report
GPD	gallons per day
GPCD	gallons per capita per day
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
JPA	Joint Powers Authority
Marin Water	Marin Municipal Water District
NMFS	National Marine Fisheries Service
PMAs	projects and management actions
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
sf	square feet
SGMA	Sustainable Groundwater Management Act
SMART	Sonoma-Marín Area Rail Transit
SMSWP	Sonoma-Marín Saving Water Partnership
SOI	Sphere of Influence
Sonoma Water	Sonoma County Water Agency
SWRCB	State Water Resources Control Board
SWSP	Santero Way Specific Plan
TOC	Transit Oriented Community
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
UWMP	Urban Water Management Plan
WSA	Water Supply Assessment

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1 Introduction

The State of California adopted Senate Bill (SB) 610 in 2001, which amended California Water Code (CWC) to require analysis of water supply availability and reliability for certain types of development projects. The purpose of SB 610 is to improve the linkage between water supply availability and land use planning decisions. This is accomplished by requiring decision-makers for certain types of land use proposals to consider whether sufficient water supplies are available to meet project demands. Under SB 610, a Water Supply Assessment (WSA) is required for any project that meets the following criteria:

- Subject to the California Environmental Quality Act (CEQA);
- Would rely on groundwater to meet some or all of its water needs; and
- Water demands would be equivalent to a 500-unit residential development.

This WSA has been prepared for the Santero Way Specific Plan (SWSP), or “proposed project,” located in the City of Cotati. This WSA contains the following information:

- Section 2, *Project Description*, provides an overview of the proposed project, including the estimated water demands associated with construction and operation.
- Section 3, *Senate Bill 610*, assesses the applicability of SB 610 to the proposed project, and identifies the need for a WSA based upon the size of the project and associated water demands, and the use of groundwater to meet local needs.
- Section 4, *Water Supply Sources*, characterizes water supply sources in the project area, including local groundwater from the Santa Rosa Plain Subbasin of the Santa Rosa Valley Groundwater Basin, and imported surface water from the Russian River, as provided by the Sonoma County Water Agency (Sonoma Water).
- Section 5, *Conclusions*, presents findings regarding water supply availability and reliability for the proposed project, based upon the data and analysis collected and developed for this WSA.

This WSA has been prepared to address the requirements of SB 610 for compliance with CEQA and the CWC. As such, this WSA serves in part to inform local and regional agencies and the public about the availability of water supply to support the proposed project in the decades after implementation. As a WSA, this document is not intended to address CEQA thresholds or related impacts; however, this WSA is subject to public review as part of the CEQA process and may be used to inform environmental impact analyses in the CEQA document for the proposed project.

2 Project Description

2.1 Location

The Santero Way Specific Plan (SWSP) site is located within the city of Cotati in Sonoma County. The project area includes parcels fronting East Cotati Avenue and along Santero Way. The project area is irregularly shaped and includes parcels that are not contiguous with each other. The project area is relatively flat and is approximately 39 acres in total. Figure 1 portrays the regional location, and Figure 2 shows the project site, discussed further in Section 2.3, *Project Characteristics*.

2.2 Background

2001 SWSP

The SWSP was adopted in August 2001, and originally envisioned a mixed-use office neighborhood, adjacent to the Sonoma-Marin Area Rail Transit (SMART) station in Cotati. The primary objective of the original SWSP was to increase the number of residents and employees within walking distance (0.5 mile) of the SMART station. Specifically, the original SWSP envisioned the development of 198 new dwelling units, 339,200 square feet of office and institutional uses, 68,000 square feet of retail uses, and 57,000 square feet of supporting parkland/open space (City of Cotati 2024a).

Since the adoption of the original SWSP in 2001, approximately 100 homes and 15,000 square feet of live-work spaces have been constructed, with an additional 98 residential units and 5,500 square feet of office and retail uses approved for development (City of Cotati 2024a). The lack of full buildout of the SWSP can partly be attributed to market forces; however, feedback has also indicated that the original SWSP was too prescriptive in terms of development standards (such as design type and building height) and too reliant on commercial square footage, given the economic changes since adoption (City of Cotati 2024a).

In response to the stalled redevelopment in this part of the city and to help meet local housing needs, the City has proposed to update the SWSP to increase the quantity of residential development in place of office and institutional square footage included in the original SWSP. The goal of these revisions is to pivot the SWSP from an office-focused, mixed-use development to a residentially focused, transit-oriented neighborhood that also allows for mixed-use and neighborhood-serving retail development.

Figure 1 Regional Location



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22-10881-010
Fig. 1 Regional Location

 Project Location

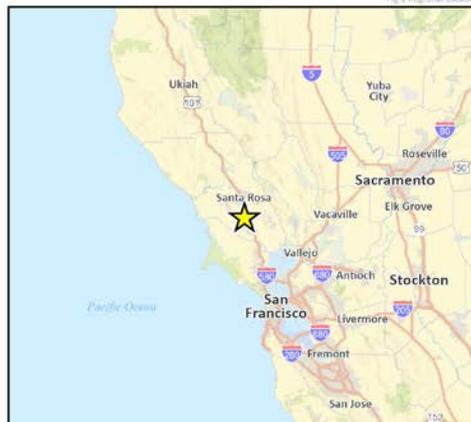


Figure 2 Project Site



2013 General Plan

The 2013 Environmental Impact Report (EIR) for the City of Cotati General Plan assessed the following new uses associated with build-out of the General Plan, which included the approved SWSP described above: 1,541 new residential units; 910,013 square feet of new commercial spaces; 511,320 of new industrial square footage. and 966,706 square feet of new office space within the City limits (City of Cotati 2014, pg. 2-10). Additionally, the General Plan EIR projected an additional 599 new residential dwelling units; 323,147 square feet of commercial land uses; 595,071 square feet of additional industrial uses; and 27,988 square feet of new office use being constructed within the Sphere of Influence (SOI) of Cotati, which would also be served by City water and sewer infrastructure (City of Cotati 2014, pg. 2-11). Combined, the General Plan EIR assumed build out of the General Plan and SOI would result in 2,140 new residential units, 1,233,160 square feet of new commercial uses, 1,106,391 square feet of new industrial space and 994,694 new square feet of office land use by 2035.

Based on the EIR for Cotati's 2013 General Plan, the city's 2025 population was projected to be 8,953 individuals, with an associated water demand of approximately 1,056 AFY. However, these projections have not materialized, as the actual population in Cotati in 2024, as reported by the California Department of Finance (DOF), is 7,303 individuals, or approximately 20 percent less than projected. Water usage in the City of Cotati has similarly been less than projected in the General Plan EIR. In 2023, the total volume of water delivered by the City of Cotati within its service area was just under 250 million gallons, as show in Figure 4 (please see Section 4, *Water Supply Sources*); this equates to 759 acre-feet (AF) of water, which included 266 AF pumped from the City's three municipal wells (see Section 4.1) and 494 AF purchased from Sonoma Water (see Section 4.2) (City of Cotati 2024b). The actual 2023 water usage of 759 AF was approximately 33 percent less than projected in the City's General Plan EIR, providing a delta of approximately 297 AF.

2.3 Project Characteristics

The SWSP Update (proposed project) provides revisions to the previously approved SWSP, with updated land use designations to support the vision described above, for a residentially-focused transit-oriented neighborhood. The proposed project is designed to encourage development within walking distance of the Cotati SMART Station and allow for mixed-use and neighborhood-serving retail development, community-serving uses, and transit-serving uses. The proposed project would result in the rezoning, land use designation change, and/or change to allowable development under the SWSP. A total of 12 parcels would be rezoned and three parcels would undergo a land use designation change. Figure 2 portrays the project site boundaries, including areas subject to expansion of the previously approved SWSP, and parcels subject to Transit-Oriented Community (TOC) development standards under the proposed project.

2.4 Water Demands

Development conducted under the proposed project would accommodate increased population in Cotati. The project would introduce up to 535 dwelling units and 459,076 square feet of non-residential commercial land uses within the SWSP Area, as well as up to 235 dwelling units and 192,289 square feet of non-residential commercial uses within the TOC area; please see Figure 2.

Compared to existing conditions, the proposed project would support a population increase of approximately 1,800 residents (2.34 individuals per household); please see Table 1, below.

Table 1 Proposed Project Development Projections

	Residential (Multi-Family)	Commercial	Population Estimate
SWSP Area	535 units	459,076 sf	1,251
TOC Parcels	235 units	192,289 sf	549
Total	769 units	651,365 sf	1,800

1. SWSP = Santero Way Specific Plan; TOC = transit oriented community; sf = square feet

As mentioned in Section 2.2, *Background*, the previously approved SWSP included 198 new residential units; because the original SWSP was approved in 2001, its development was accounted for in planning documents including the Urban Water Management Plan (UWMP) produced by Sonoma County Water Agency (“Sonoma Water”), which is updated every five years as discussed further in the following sections (see Section 3.4, *Is There a Current UWMP that Accounts for the Proposed Project’s Water Demand*, and Section 4.2, *Sonoma County Water Agency*). For the purposes of this WSA, water demands associated with all land uses included under the proposed project are quantified in Table 2, below.

Commented [NH1]: And approximately 300000 sq ft of new commercial square footage

Table 2 Water Demands Overview

Land use	Quantity	Water Demand Factor	Water Demand
Residential	769 units	206 GPD/unit ¹	178 AFY
Commercial	651,465 square feet	1,600 GPD/acre ²	27 AFY
Total	n/a	n/a	205 AFY

1. The residential water demand factor of 206 gallons per day (GPD) per unit is based upon the City of Cotati’s 2019 per capita water use rate of 88 gallons per capita per day (GPCD) (City of Cotati 2020, Table 3-1), and assuming 2.34 individuals per residential unit (estimated based upon 1,800 new residents in 769 residential units, as shown in Table 1).
 2. The commercial water demand factor of 1,600 GPD per acre is based upon the City of Cotati’s estimated 2035 water demands for the East Cotati Commercial Corridor, adjacent to the current SWSP Area, and assuming that water needs for commercial uses within the SWSP Area would be comparable to those in the East Cotati Commercial Corridor (City of Cotati 2011, pg. 4-6).

As shown above, for the purposes of this WSA, it is estimated that water demands associated with build-out of development under the proposed project would total approximately 205 AFY. As discussed in the footnotes to Table 2, this estimate is based upon measured data published by the City of Cotati and assumptions developed to inform this analysis, as further discussed below.

- **Residential Water Demands.** The City of Cotati’s 2020 *Water Demand Analysis and Water Conservation Measure Update* details historic per capita potable water use for the years 1995 through 2019, accounting for City-provided water supply as well as “non-revenue water,” or water that has been produced but not billed and therefore does not generate revenue for the supplier (City of Cotati 2020). This data indicates that in 2019, per capita water use in the City of Cotati was approximately 88 gallons per capita per day (GPCD) (City of Cotati 2020, Table 3-1, *Water Use and Population*). Water use is influenced by factors including weather, economic recession, and state and local regulations, among other factors; as such, a “representative” baseline year is used to estimate baseline water use by existing customers, which can then be extrapolated and applied to future growth within the city (City of Cotati 2020, pg. 4-3). Therefore, for the purposes of this WSA, the 2019 per capita water use rate of 88 GPCD was

used to inform calculation of water demands associated with the proposed project. Assuming 88 GPCD and 2.34 individuals per residential unit, the total water demand per household would be approximately 206 GPD; water demands for the proposed project's total 769 new residential units would be approximately 158,414 GPD, which equates to 57,821,110 gallons per year or approximately 178 AFY (rounded up from 177.5).

- **Commercial Water Demands.** The City of Cotati's 2011 *Water Distribution System Master Plan* details average daily demand rates for various types of land uses throughout the city, including 1,600 GPD/acre for uses within Zone CE, the East Cotati Commercial Corridor, which is adjacent to the current SWSP Area assessed herein (City of Cotati 2011, pg. 4-6). For the purposes of this WSA, it is assumed that commercial and mixed use developments conducted under the proposed project would have water demands equivalent to those in Zone CE. The proposed project would introduce approximately 651,465 square feet of commercial and mixed use space, which equates to approximately 15 acres. Using the Zone CE water demand rate of 1,600 GPD/acre, the proposed project's water demands for this area would total approximately 27 AFY (rounded up from 26.88).

The City's 2011 *Water Distribution System Master Plan* included water demand estimates for the original SWSP, assuming a 2035 water demand rate of approximately 3,300 GPD/acre for the SWSP's original site design, which totaled approximately 20.55 acres in size (City of Cotati 2011, pg. 2-3). Applying the original project's average per-acre water demand rate to the current proposed project's current site of 39 acres provides a total water demand of approximately 144 AFY; however, this approach does not differentiate between residential and commercial uses, and does not account for design changes incorporated into the proposed project, compared to the original project. Therefore, for the purposes of this WSA, the more conservative water demand rate of approximately 205 AFY is assumed for the proposed project and evaluated herein with respect to supply availability and reliability.

3 Senate Bill 610

Water demands associated with the proposed project are described in Section 2.3, *Water Demands*. This section addresses the applicability of SB 610 to the proposed project. The CWC, as amended by SB 610, requires a WSA to address the following questions:

- Is there a public water system that will service the proposed project? (see Section 3.3)
- Is there a current Urban Water Management Plan (UWMP) that accounts for the Project demand? (see Section 3.4)
- Is groundwater a component of the supplies for the Project? (see Section 3.5)
- Are there sufficient supplies to serve the Project over the next twenty years? (see Section 3.6)

The primary question to be answered in a WSA is:

Will the total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection meet the projected water demand of the proposed project, in addition to existing and planned future uses of the identified water supplies, including agricultural and manufacturing uses?

The following sections address the SB 610 WSA questions as they relate to the proposed project.

3.1 Is the Proposed Project Subject to CEQA?

Yes, the proposed project is subject to CEQA.

CWC Section 10910(a) states that any city or county that determines a project (as defined in CWC Section 10912) is subject to CEQA shall also comply with CWC Section 10910; this is the section that was amended by SB 610 to require the assessment of water supply availability and reliability in a WSA. The proposed project requires multiple discretionary approvals, including from the City of Cotati, and is therefore subject to CEQA.

3.2 Is the Proposed Project a “Project” Under SB 610?

Yes, the proposed project is a “Project” under SB 610.

CWC Section 10912(a) states that any proposed action which meets the definition of “project” under SB 610 is required to be analyzed in a WSA. SB 610 defines a “project” as any one of seven different development types, each of which is considered below.

- **Residential Development.** A proposed residential development of more than 500 dwelling units is defined as a “project” under SB 610. The proposed project would introduce more than 500 residential dwelling units, and therefore classifies as a SB 610 project based on residential uses.
- **Shopping Center or Business Establishment.** A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space is defined as a “project” under SB 610. The proposed project would introduce more than 500,000 square feet of non-residential commercial land uses, and therefore classifies as a SB 610 project based on commercial (shopping center or business establishment) uses.

- **Commercial Office Building.** A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space is defined as a “project” under SB 610. The proposed project does not specifically include an office building; however, it does include more than 500,000 square feet of non-residential commercial land uses. As noted above, the proposed project qualifies as a SB 610 project based on commercial uses.
- **Hotel or Motel.** A proposed hotel or motel, or both, having more than 500 rooms is defined as a “project” under SB 610. The proposed project does not include a hotel or motel and does not qualify as a SB 610 project under this category.
- **Industrial, Manufacturing or Processing Plant, or Industrial Park.** A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area is defined as a “project” under SB 610. The proposed project does not include an industrial, manufacturing, or processing plant or industrial park, and does not qualify as a SB 610 under this category.
- **Mixed-Use Project.** A proposed mixed-use project that includes one or more of the projects specified earlier is defined as a “project” under SB 610. The proposed project qualifies as a SB 610 project under two categories addressed above, including as a residential development and a shopping center or business establishment. As stated above, the proposed project qualifies as a SB 610 project, thereby triggering preparation of this WSA to satisfy SB 610.

The proposed project is considered a “project” under SB 610 and a WSA is therefore required to inform environmental analysis for the project’s CEQA document and regulatory permit applications.

3.3 Is There a Public Water System that Will Serve the Proposed Project?

Yes, there is a public water system that will serve the proposed project.

CWC Section 10912(c) defines a “public water system” as a system with 3,000 or more urban service connections that provides piped water to the public for human consumption. The U.S. Environmental Protection Agency also defines a public water system as one that “provides water for human consumption through pipes or other constructed conveyances to at least 15 service connections or serves an average of at least 25 people for at least 60 days a year” (USEPA 2024).

The City of Cotati serves water supply for a population of approximately 7,628 people, but has fewer than 3,000 connections (City of Cotati 2020), and is therefore not a public water system per CWC Section 10912(c). However, the City’s water supply system does qualify as a public water system under the USEPA’s definition. Additionally, the City delivers water provided by Sonoma Water, which is a public water system with more than 3,000 urban service connections.

3.4 Is There a Current UWMP that Accounts for the Proposed Project’s Water Demand?

Yes, there is a current UWMP that accounts for the proposed project.

In California, every urban water supplier (publicly or privately owned) that delivers more than 3,000 AFY of water annually or serves more than 3,000 urban water connections is required to prepare an

UWMP to assess and manage the reliability of the supplier's water sources over a 20-year period, and also consider normal water-year, single-dry water-year (periodic drought), and multiple-dry water-year (sustained drought) scenarios. These are the same requirements of a WSA, as specified by SB 610; therefore, when an UWMP exists for the subject area, it is used to inform project-specific WSAs. UWMPs must be updated and submitted to the California Department of Water Resources (DWR) every five years for review and approval, and are publicly available for review.

The City of Cotati serves a population of approximately 7,628 people, but has fewer than 3,000 connections and provides less than 3,000 AFY; therefore, the City is not required to prepare an UWMP under the CWC Sections 10610-10656 and Section 10608 (City of Cotati 2020). However, the City actively participates in local and regional water supply planning as one of nine collaborative members of the Sonoma-Marín Saving Water Partnership (SMSWP), all of which are also Sonoma Water contractors.¹ The SMSWP members conducted a joint update of their water demand projections and water conservation planning efforts in 2020, with the following goals:

- Evaluate and document recent historical water use characteristics and trends, including population and account growth;
- Estimate projected water demands for the years 2025 through 2045 to support both the 2020 UWMP update and coordination and planning efforts with Sonoma Water;
- Update the suite of common regional conservation measures that are being considered for implementation in the future;
- Review and document past participation in water conservation programs; and
- Estimate the potential water savings associated with future water conservation program implementation (City of Cotati 2020).

Sonoma Water, which provides wholesale surface water to all members of the SMSWP, used the SMSWP's 2020 data on anticipated water demands to inform its 2020 UWMP. The City of Cotati's participation in the SMSWP is documented in its *2020 Water Demand and Conservation* report (City of Cotati 2020). Sonoma Water's 2020 UWMP is informed by the SMSWP's 2020 data, including anticipated population growth and associated water demands. As of 2020, Sonoma Water and its customers (including the City of Cotati) collectively serve 629,414 people and the population is projected to grow to 773,926 by 2045 (Sonoma Water 2021a). Within the city of Cotati, population is projected to grow from 7,945 in 2020 to 11,964 in 2045 (City of Cotati 2020), including growth that would be accommodated by the SWSP updates provided by the proposed project.

Data from Sonoma Water's 2020 UWMP is presented in Section 4.2, *Sonoma County Water Agency*, to inform the analysis of water supply availability and reliability for the proposed project.

¹ In addition to the City of Cotati, other participating members of the SMSWP include the City of Petaluma, City of Rohnert Park, City of Santa Rosa, City of Sonoma, Marin Municipal Water District, North Marin Water District, Town of Windsor, and Valley of the Moon Water District.

3.5 Is Groundwater a Component of the Water Supply for the Proposed Project?

Yes, groundwater is a component of the water supply sources available to the proposed project.

Water supply in the City of Cotati is sourced in part as local groundwater from three City-owned wells in the Santa Rosa Plain Subbasin of the Santa Rosa Valley Groundwater Basin. Water supply is also sourced as surface water from the Russian River, provided by Sonoma Water. For the purposes of this WSA, all potential water supply sources are evaluated for availability and reliability to the proposed project.

3.6 Are There Sufficient Supplies to Serve the Project Over the Next Twenty Years?

As noted previously, the purpose of a WSA is to tie land use planning decisions to the physical availability of water supply, and specifically as related to groundwater. This WSA presents data to support quantitative analysis of water supply availability and reliability for the proposed project, and provides informed conclusions in Section 5. As discussed therein, sufficient water supplies are available to serve the project over the next 20 years, and with consideration to varying climatic (drought) conditions.

4 Water Supply Sources

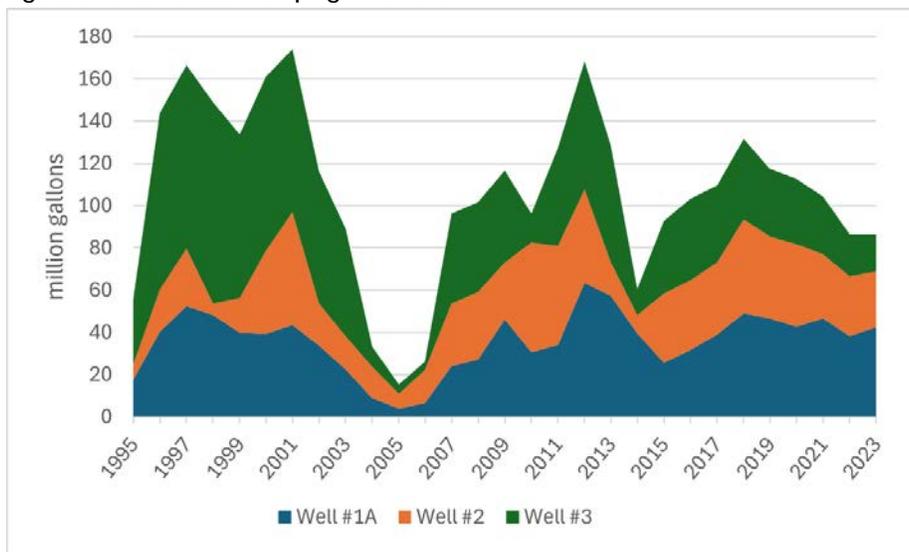
The City of Cotati owns and operates three groundwater production wells in the Santa Rosa Plain Subbasin, which serves as the city’s primary water supply source. The City also purchases surface water from Sonoma Water, with increased reliance on Sonoma Water supplies during dry-year conditions, when the availability of local groundwater is reduced.

The figures presented below provide an overview of Cotati’s historic groundwater pumping rates.

- Figure 3 shows that the City relies upon each of its three wells to varying degrees, with all three wells producing substantially reduced supply in 2005 and 2014, which were both during historic drought periods.
- Figure 4 shows that the City’s reliance on water purchased from Sonoma Water increases and decreases commensurate to the availability of local groundwater.

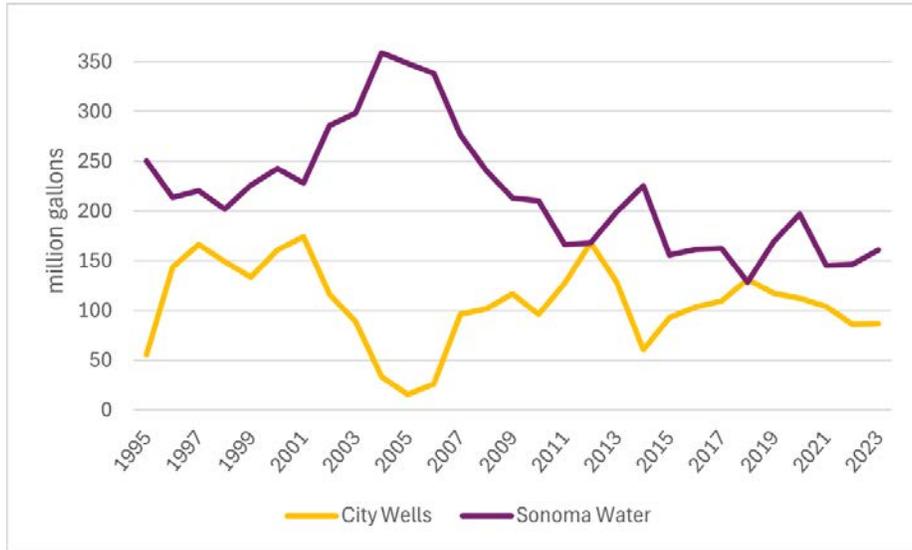
As shown in these figures, the City of Cotati relies most heavily on Sonoma Water supply when local groundwater availability is reduced.

Figure 3 Groundwater Pumping 1995-2023



Source: City of Cotati 2024b

Figure 4 Total Water Supplies 1995-2023



Source: City of Cotati 2024b

The figures presented above indicate that locally produced groundwater supply and purchased Sonoma Water supply are both critical to the City’s water supply portfolio. Therefore, both supply sources are therefore addressed in this WSA; see Section 4.1 for discussion of groundwater resources, and Section 4.2 for discussion of Sonoma Water.

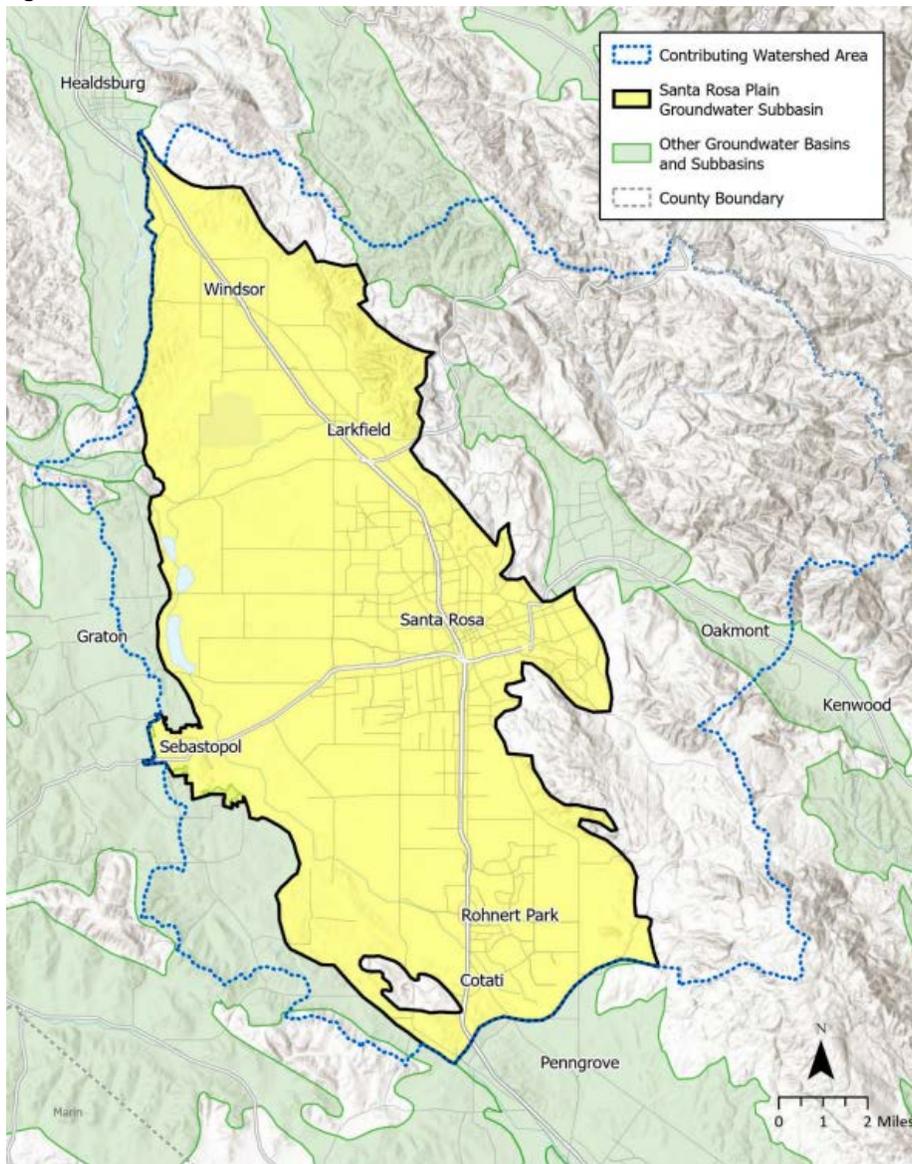
4.1 Santa Rosa Plain Subbasin, Santa Rosa Valley Groundwater Basin

Figure 5, below, provides an overview of the Santa Rosa Plain Subbasin; as shown, the City of Cotati is in the southern-most portion of the subbasin. The DWR has classified the Santa Rosa Plain Subbasin as Medium Priority; therefore, in accordance with the Sustainable Groundwater Management Act (SGMA), it is required to be managed by a Groundwater Sustainability Agency (GSA) through implementation of a DWR-approved Groundwater Sustainability Plan (GSP) to provide and maintain sustainable conditions. The Santa Rosa Plain GSA is a Joint Exercise of Powers Agreement (JPA) formed by the cities of Cotati, Rohnert Park, Santa Rosa, and Sebastopol; the Town of Windsor; Gold Ridge Resource Conservation District; Sonoma County (County); Sonoma Water; Sonoma Resource Conservation District; and an organized group of mutual water and Public Utilities Commission-regulated companies (Independent Water Systems).

The Santa Rosa Plain Subbasin is approximately 22 miles long from north to south, and its width varies between approximately six and nine miles. Water suppliers in the subbasin consist of the Town of Windsor and the Cities of Cotati, Rohnert Park, Santa Rosa, and Sebastopol, as well as Cal-American Water Company’s Larkfield system. Residences located outside of urban water supply

systems rely on groundwater; there are estimated to be between 4,000 and 5,500 private domestic wells throughout the subbasin. (Santa Rosa Plain GSA 2021)

Figure 5 Santa Rosa Plain Subbasin



Source: Santa Rosa Plan GSA 2021, pg. ES-2

Hydrogeologic Setting

The Santa Rosa Plain Subbasin is located in a geologically complex region where faults serve as major structural boundaries for groundwater movement, causing groundwater resources to be highly variable throughout the subbasin. Clay layers serve as aquitards between shallow and deep aquifer systems, with recharge primarily occurring through direct infiltration of precipitation from storm events and surface water in streams. Recharge to the deeper aquifer zones occurs over many years and likely occurs through leakage from overlying shallow aquifers and mountain-front recharge along the margins of the valley. (Santa Rosa Plain GSA 2021)

There are productive freshwater aquifers at shallower depths, generally less than 200 feet where many residential wells are drilled, as well as at deeper depths, where many municipal, industrial, and agricultural wells are constructed; the deepest wells extend to approximately 1,500 feet. Although aquifer systems are grouped separately, as shallow and deep systems, there is variable connectivity between the them, depending upon the presence and thickness of clay aquitards. In many areas the shallow aquifer system is locally and seasonally connected to creeks and streams and in some areas where the depth to groundwater is very shallow, the shallow aquifer system provides water for vegetation communities (also known as “groundwater dependent ecosystems”). The deep aquifer system is generally confined to semi-confined and is not spatially connected with surface water (although there is hydraulic connectivity between the shallow and deep aquifers, which do connect surface water to the deep aquifer system). (Santa Rosa Plain GSA 2021)

Groundwater Levels

Groundwater monitoring conducted in 37 shallow aquifer wells and 24 deep aquifer wells indicate stable groundwater levels in the shallow system, with increasing trends in 16 percent of the shallow wells (six of 37), and stable or increasing levels in the deep aquifer system, with increasing trends in nearly 63 percent of the deep wells (15 of 24). Historically, groundwater levels in the Rohnert Park-Cotati area declined by more than 100 feet in the 1980s and 1990s due to population growth and associated municipal pumping of the local groundwater. However, these trends have been recovering since then, through the use of imported surface water and recycled water from Sonoma Water, which reduces reliance on groundwater resources. (Santa Rosa Plain GSA 2021)

Groundwater Budget

The amount of groundwater in storage at any time depends upon multiple factors including the weather, overall climatic (drought) conditions, and groundwater pumping rates. Water budgets for the Santa Rosa Plain Subbasin were developed for the GSP to support the development of appropriate sustainable management practices, accounting for all inflows and outflows to the subbasin including as connected to surface waters. Table 3, below, provides an overview of inflows and outflows to the Santa Rosa Plain Subbasin under current conditions, as represented by years 2012-2018, as well as for projected conditions over years 2021-2040, and extended projections for years 2021-2070 to account for extended drought conditions initiating in 2050.

Overall, groundwater outflows are larger than inflows, with approximately balanced conditions over the 2021-2040 period, which is characterized by high rates of precipitation, and projected decline in groundwater availability over the extended 2021-2070 period, which is characterized by drought conditions. Outflows are also projected to increase in the future, through outflows to streams and agricultural pumping. (Santa Rosa Plain GSA 2021)

Table 3 Average (Mean) Inflows and Outflows, Santa Rosa Plain Subbasin (AFY)

	2012-2018	2021-2040	2021-2070
Inflows			
Deep percolation (precipitation and applied water)	25,200	32,800	28,800
Streambed recharge to groundwater	14,900	16,700	16,900
Septic system return flows	1,200	1,400	1,500
Subsurface inflow from surrounding watershed	2,000	2,000	2,000
Subsurface inflow from neighboring basins	7,400	7,700	8,000
Total Inflows	50,700	60,600	57,200
Outflows			
Agricultural pumping	10,400	12,600	13,800
Groundwater evapotranspiration	9,500	11,700	10,600
Subsurface outflow to adjacent basins	4,700	4,300	4,000
Discharge to streams	13,700	14,500	12,800
Surface leakage	5,200	6,200	4,900
M&I and rural Domestic pumping	9,500	11,300	12,300
Total Outflows	53,000	60,600	58,400
Balance (Total Inflows – Total Outflows)	-2,300	0	-1,200

Source: Santa Rosa Plain GSA 2021, pgs. 3-110, 3-111, 3-133, 3-134, 3-136

As discussed in the Santa Rosa Plain GSP, the sustainable yield for the subbasin is defined as 23,900 AFY, which is the total amount of groundwater pumping over 2021-2040, where “sustainable yield” is the amount of groundwater that can be withdrawn without causing undesirable results. However, also as discussed in the GSP, the sustainable yield is based upon non-drought conditions and does not account for projects and management actions that may improve the amount of groundwater in storage. If actual climate conditions in the future are better represented by the drought conditions modeled over years 2050-2070, then the sustainable yield would need to be reduced to provide balanced conditions in the subbasin, or projects and management actions would need to be implemented to avoid undesirable results (Santa Rosa Plain GSA 2021, pg. 3-148).

Projects and Management Actions

The Santa Rosa Plain GSP identifies projects and management actions (PMAs) under three groups of projects, that would be implemented using an adaptive management strategy to allow the GSA to react to the progress and outcomes of PMAs as they are implemented, and adjust management efforts as needed to successfully avoid undesirable results in the subbasin. The three groups of PMAs are summarized below, as detailed in the Santa Rosa Plain GSP (Santa Rosa Plain GSA 2021).

- **Group 1: Water Use Efficiency and Alternate Water Source Projects.** These projects include smaller-scale dispersed land-owner projects such as turf removal, rainwater harvesting, and stormwater capture for reuse; these types of projects are initially planned as voluntary, incentive-based projects focused on groundwater users.
- **Group 2: Stormwater Capture and Recharge.** These projects include retaining and recharging onsite runoff through low-impact development and on-farm recharge of local runoff, as well as through recharge of unallocated storm flows including managed floodplain inundation. These

actions require temporary diversions of storm flows from streams, and conveyance of those flows to recharge locations.

- **Group 3: Aquifer Storage and Recovery (ASR).** An ASR program would involve diverting surplus Russian River water during wet weather conditions (winter and spring seasons) and storing it in the deep aquifer system for later recovery and use during dry weather conditions (summer and fall seasons) or emergency situations.

Anticipated water supply benefits associated with PMAs identified for the Santa Rosa Plain Subbasin are summarized in Table 4, below.

Table 4 Anticipated Supply Benefits of Projects and Management Actions

PMA	Description	Supply Benefit
Group 1: Water Use Efficiency and Alternate Water Source Projects	Reduce crop consumptive use (agricultural pumping); reduce rural domestic pumping	1,800 AFY
Group 2: Stormwater Capture and Recharge	Capture surface runoff and place in recharge basins for surface infiltration	240 AFY
Group 3: Aquifer Storage and Recovery	Use existing municipal wells to store surplus Russian River water in deep aquifer system	940 AFY
Total		2,980 AFY

Source: Santa Rosa Plain GSA 2021, pg. 6-12

As shown above, PMAs identified for the Santa Rosa Plain Subbasin are designed to provide a cumulative benefit to groundwater supply of up to 2,980 AFY.

4.2 Sonoma County Water Agency

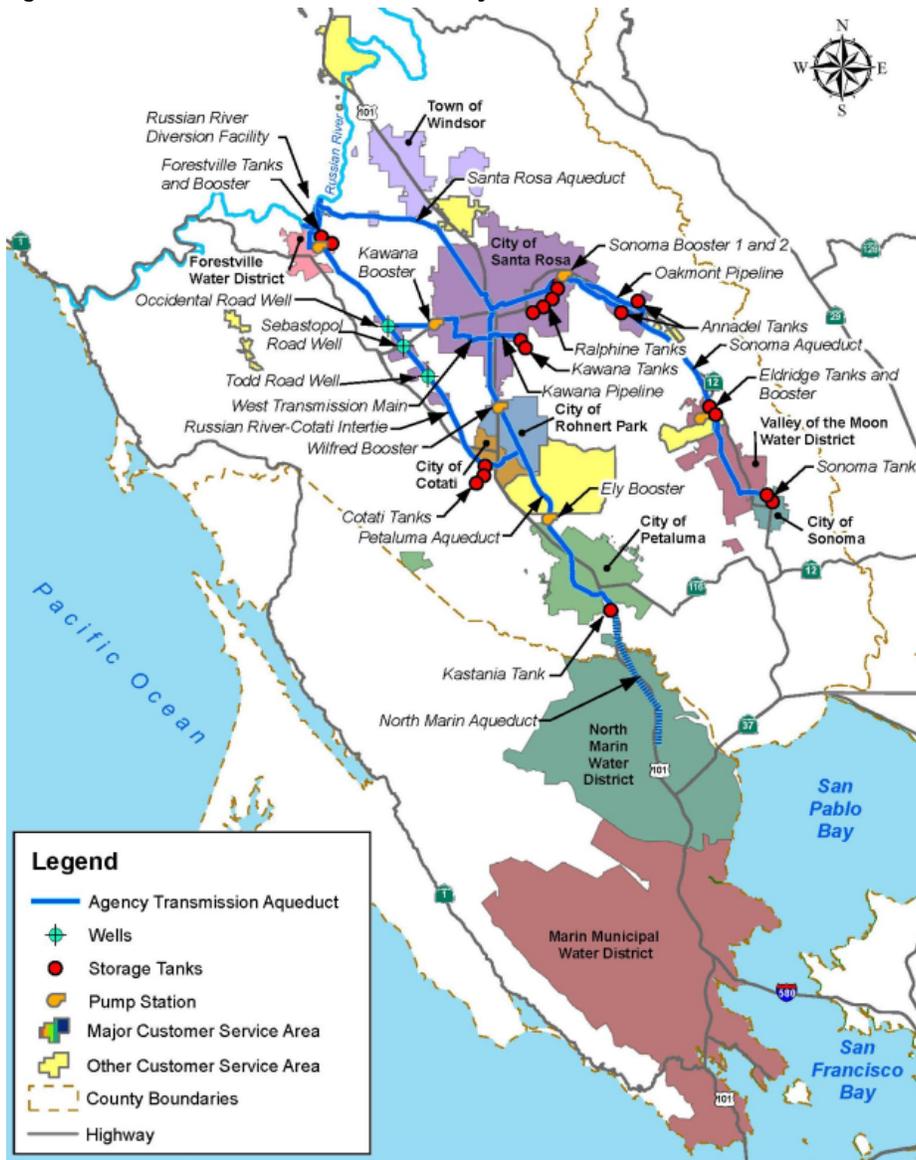
As shown in Figure 4, the city of Cotati relies on water supply from Sonoma Water to supplement its local groundwater resources. Sonoma Water provides wholesale water from the Russian River to eight water contractors, other water transmission system customers, and the Marin Municipal Water District (“Marin Water”), as shown in Table 5, below.

Table 5 Sonoma Water Contractors and Customers

Customer Type	Description
Water Contractors	City of Cotati; City of Petaluma; City of Rohnert Park; City of Santa Rosa; City of Sonoma; Town of Windsor; North Marin Water District; Valley of the Moon Water District
Other Transmission System Customers	California-American Water Company (for Larkfield-Wikiup); Forestville Water District; Kenwood Village Water Company; Lawndale Mutual Water Company; Penngrove Water Company; State of California; Santa Rosa Junior College; County of Sonoma
Marin Water	Authorized under a 2015 Supplemental Water Supply Agreement, subject to transmission system capacity, for up to 12.8 million gallons per day during May through October
Surplus Water Customers	Surplus water is occasionally available in excess of the amounts required to meet Sonoma Water’s contractual obligations and the requirements of all Sonoma Water’s regular customers.
Russian River Customers	City of Healdsburg, Camp Meeker Recreation and Park District, and Occidental Community Services District.

Sonoma Water’s service area covers a large part of Sonoma County and the eastern portion of Marin County, as shown in Figure 6, below.

Figure 6 Sonoma Water Service Area and Key Infrastructure



Source: Sonoma Water 2021a, pg. 3-2

In addition to showing the city of Cotati approximately centered within Sonoma Water’s service area, the figure above also identifies the Cotati Tanks, which provide necessary water storage for the City of Cotati, and which are currently being rehabilitated by Sonoma Water.

Sonoma Water primarily delivers Russian River water, in accordance with multiple permits, regulatory agreements, and water rights allocations. Sonoma Water also produces local groundwater. Sonoma Water does not supply recycled water, but it does distribute recycled water provided by other agencies; Sonoma Water does not provide any supplemental treatment to recycled water prior to distribution to its customers. These water supply sources are discussed under respective headings below. In addition, Sonoma Water has identified types of water supply projects that are being considered for implementation to support water supply reliability for its customers, also as discussed under a respective heading below.

Russian River Water

Most water provided by Sonoma Water is sourced from the Russian River. The Russian River watershed drains an area of 1,485 square miles that includes much of Sonoma and Mendocino counties, as shown in Figure 7 on the following page; as shown, the city of Cotati is located at the downstream end of the watershed, adjacent to the Petaluma Aqueduct. Two federal projects impound water in the Russian River watershed:

- Coyote Valley Dam on the Russian River east of the city of Ukiah in Mendocino County (forming Lake Mendocino), and
- Warm Springs Dam on Dry Creek (a tributary of the Russian River) northwest of the City of Healdsburg in Sonoma County (forming Lake Sonoma).

Sonoma Water was the local sponsor for these federal dams and partially financed their construction; therefore, Sonoma Water has the right to control releases from the water supply pools of both Lake Mendocino and Lake Sonoma. The “Russian River Project” refers collectively to both reservoirs and their associated facilities, including diversion facilities, treatment facilities, aqueducts, pipelines, water storage tanks, and booster pump stations. The Russian River Project is operated in accordance with Sonoma Water’s water rights permits and SWRCB’s Decision 1610, discussed further below. Sonoma Water makes no diversions from the Russian River between Lake Mendocino and the Russian River’s confluence with Dry Creek, but it does authorize diversions by others under its water rights permits. Flood management releases from both reservoirs are controlled by the U.S. Army Corps of Engineers (USACE). (Sonoma Water 2021a)

As noted, Sonoma Water’s use of Russian River water is conducted in accordance with regulatory agreements and decisions; these include four water rights permits issued by the State Water Resources Control Board (SWRCB) (permit nos. 12947A, 12949, 12950, and 16596). Sonoma Water is permitted to store up to 122,500 AFY of Russian River water in Lake Mendocino and up to 245,000 AFY of Russian River water in Lake Sonoma, as well as to divert up to 180 cubic feet per second (cfs) of Russian River water up to 75,000 AFY (Sonoma Water 2021a).

Sonoma Water’s permits also establish minimum instream flow requirements for fish and wildlife protection and recreation. Minimum flow requirements vary depending on hydrologic conditions which are classified as “normal year” conditions, single dry-year conditions, and multiple dry-year conditions, defined by Sonoma Water’s water rights permits and the SWRCB’s 1986 Decision 1610. Sonoma Water meets instream flow requirements by making releases within the Russian River from Coyote Valley Dam and Warm Springs Dam, as needed. (Sonoma Water 2021a, pg. 5-1)

Figure 7 Russian River Watershed



Source: Sonoma Water 2021a, pg. 5-2

In addition to the SWRCB permits and Decision 1610, there is also a Russian River Biological Opinion set forth by the National Marine Fisheries Service (NMFS) that requires modification of flow requirements on the Russian River and Dry Creek to maintain the Biological Opinion's Incidental Take Statement. Sonoma Water's evaluation of future Russian River water supply availability provided in its 2020 UWMP assumes that proposed modifications to the minimum instream flow requirements are implemented for compliance with the SWRCB's Decision 1610 as set forth in the USFWS Biological Opinion. (Sonoma Water 2021a, pg. 5-1)

In 2006, the Restructured Agreement for Water Supply ("Restructured Agreement") was established to provide a contractual relationship between Sonoma Water and its eight contractors and includes quantities of water they require and at flow rates that are necessary to meet their peak day demands (subject to delivery limitations). The Restructured Agreement generally provides for the finance, construction, and operation of existing and new diversion facilities, transmission lines, storage tanks, booster pumps, conventional wells, and appurtenant facilities. The City of Cotati, as one of Sonoma Water's eight contractors, is subject to the Restructured Agreement.

Groundwater

In addition to Russian River water, Sonoma Water also produces local groundwater from the Santa Rosa Plain Subbasin, discussed above in Section 4.1. Sonoma Water has three groundwater supply wells, which are shown in Figure 6 as being located along Sonoma Water's aqueduct in the Santa Rosa Plain at Occidental Road, Sebastopol Road, and Todd Road. The wells were constructed in 1977 as emergency supply wells in response to historic drought conditions in 1975-1976. They range in depth from 794 to 1,060 feet, producing from the deep aquifer system, with pumping capacities ranging from 1,300 to 2,200 gallons per minute (gpm).

Although initially constructed for emergency use, relatively continuous operations of wells began in 1999 (Todd Road well), 2001 (Sebastopol Road well), and 2003 (Occidental Road well), and continued through 2008. The annual groundwater quantities pumped by Sonoma Water between 2006 and 2010 ranged from a high of 3,922 AF in 2008 to a low of 52 AF in 2010, with an average pumping rate of approximately 2,514 AFY. 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; as such, during years when sufficient supply is available from the Russian River, groundwater production is limited. Since shifting to seasonal and as-needed use, groundwater production between 2011 and 2015 ranged from 172 to 1,271 AF for an average of 643 AFY; between 2016 and 2020, groundwater production declined substantially to an average production rate of 20 AFY. (Sonoma Water 2021a)

Sonoma Water conducts groundwater monitoring in seventeen dedicated monitoring wells placed near its three water supply wells. In general, the data collected through Sonoma Water's groundwater monitoring program indicate the findings summarized below.

- Normal seasonal fluctuations in groundwater levels;
- Rapid drawdown and recovery in response to pumping cycles within the deeper monitoring wells perforated across the same horizon as the groundwater supply wells;
- No discernable short-term responses to pumping cycles within shallower monitoring wells;
- An overall trend of lowering of deeper zone groundwater levels between approximately 2000 and 2009 when the groundwater supply wells were operating relatively continuously followed by subsequent recovery of groundwater levels between 2009 and 2020; and

- General stability of shallow zone groundwater levels, with the exception of shallow zone monitoring wells located near the Occidental Road well which exhibited declines ranging between 15 to 30 feet between approximately 2000 and 2009 followed by subsequent recovery or stabilization of groundwater levels between 2009 and 2020 (Sonoma Water 2021a, pg. 5-17).

Consistent with the discussion of the Santa Rosa Plain Subbasin presented in Section 4.1, the findings above from Sonoma Water’s groundwater monitoring program indicate relatively stable groundwater conditions with resilience to periods of heavier use at specific production wells.

Supply Reliability Projections

Sonoma Water’s surface water supply is subject to reductions during dry years; when Lake Sonoma contains less than 100,000 AF before July 15 in a given year, Sonoma Water’s water rights permits and Decision 1610 require a 30 percent reduction of diversions compared to the same time period the previous year. Sonoma Water’s groundwater supply availability is assumed to not be affected by dry years due to the short duration of production under such conditions and the monitored resilience of the basin to such uses. The following tables present Sonoma Water’s projections of water supply availability (demand compared to supply):

- Table 6 presents normal year conditions,
- Table 7 presents single dry-year conditions, and
- Table 8 presents multiple dry-year conditions.

As discussed in Section 3.4, the supply availability projections from Sonoma Water’s 2020 UWMP are informed in part by the City of Cotati’s *2020 Water Demand and Conservation* report (City of Cotati 2020). As a result, the supply availability projections presented in the tables below account for anticipated water demands within the City of Cotati, including growth that would be accommodated by the proposed project.

Table 6 Sonoma Water - Normal Year Supply and Demand

	2025	2030	2035	2040	2045
Supply totals	65,020	69,177	70,725	72,588	74,547
Demand totals	65,020	69,177	70,725	72,588	74,547
Difference	0	0	0	0	0

1. When excess supply is available, the projected supply is shown as equal to demand.

Source: Sonoma Water 2021a, pg. 6-3

The table above shows that Sonoma Water projects having adequate water supply available in normal years to meet all projected demands through 2045.

Table 7 Sonoma Water - Single Dry Year Supply and Demand

	2025	2030	2035	2040	2045
Supply totals	65,020	58,168	58,897	59,789	60,656
Demand totals	65,020	69,177	70,725	72,588	74,547
Difference	0	-11,009	-11,828	-12,799	-13,891

1. When excess supply is available, the projected supply is shown as equal to demand.

Source: Sonoma Water 2021a, pg. 6-4

The table above shows that water demands are expected to exceed available supplies during single dry years starting in 2030. This shortage reflects the availability of surface water supplies, and results due to Lake Sonoma declining below 100,000 AF before July 15, coupled with Sonoma Water's water rights requirement to decrease diversions by 30 percent under these conditions. In anticipation of single dry-year shortage conditions, Sonoma Water would work with its contractors and customers to reduce water demands and utilize local supplies to the extent feasible, which have been successful strategies in the past. Sonoma Water would also work with the SWRCB and other Russian River water users to reduce water demands, as was successfully conducted under conditions similar to those projected above in 2007, 2009, 2013, 2014, and 2015. Based on efforts over the last five years which have been characterized by dry conditions, Sonoma Water does not anticipate any difficulty in maintaining an adequate water supply during single dry-year conditions. (Sonoma Water 2021a, pg. 6-3)

Table 8 Sonoma Water - Multiple Dry Years Supply and Demand

		2025	2030	2035	2040	2045
First Year	Supply totals	65,020	69,177	70,725	72,588	74,547
	Demand totals	65,020	69,177	70,725	72,588	74,547
	Difference	0	0	0	0	0
Second Year	Supply totals	65,020	69,177	70,725	72,588	74,547
	Demand totals	65,020	69,177	70,725	72,588	74,547
	Difference	0	0	0	0	0
Third Year	Supply totals	65,020	69,177	70,725	72,588	74,547
	Demand totals	65,020	69,177	70,725	72,588	74,547
	Difference	0	0	0	0	0
Fourth Year	Supply totals	65,020	69,177	70,725	72,588	74,547
	Demand totals	65,020	69,177	70,725	72,588	74,547
	Difference	0	0	0	0	0
Fifth Year	Supply totals	65,020	69,177	70,725	72,588	74,547
	Demand totals	65,020	69,177	70,725	72,588	74,547
	Difference	0	0	0	0	0

1. When excess supply is available, the projected supply is shown as equal to demand.

Source: Sonoma Water 2021a, pg. 6-4

The table above shows that Sonoma Water projects no water supply deficiencies during multiple consecutive dry-year conditions, with adequate water supply available to meet demands through the 2045 planning horizon. The water demands presented above do not reflect local water supply developed by Sonoma Water's individual contractors, such as groundwater usage conducted by the City of Cotati; rather, these demands reflect the amount of water anticipated to be needed by Sonoma Water contractors to meet their local needs, in addition to their respective local supplies. As previously noted, Sonoma Water's 2020 UWMP was informed by water demand projections developed by the City of Cotati and its other contractors. Therefore, as reflected above, sufficient water supply is available to meet Sonoma Water contractor needs, including the City of Cotati, under multiple dry-year conditions.

5 Conclusions

This WSA included conservative calculation of potential water demands of the proposed project, and compared those demands to the water supplies available over a 20-year planning horizon, for consistency with CWC as amended by SB 610. Varying drought conditions and ongoing long-term supply management activities were also considered in the analysis of water supply availability and reliability. Local groundwater produced by the City of Cotati and surface water purchased from Sonoma Water were addressed as the water supply sources for the project.

The characterization of the Santa Rosa Plain Subbasin provided in Section 4.1 indicates that although outflows tend to be larger than inflows to the subbasin, groundwater levels are consistently stable or increasing throughout the subbasin and particularly in Cotati. Table 3, *Average (Mean) Inflows and Outflows*, indicates that that modeled conditions over 2021-2040 are balanced, with inflow comparable to outflow, while modeled conditions over 2021-2070, which includes modeled drought conditions beginning in 2050, are characterized by approximately 1,200 AF more outflow than inflow. However, the Santa Rosa Plain GSP also describes that modeled conditions are used to inform future management of the subbasin; if actual conditions reflect the drought scenario modeled in 2050, then PMAs would be implemented (Santa Rosa Plain GSA 2021, pg. 3-148).

Table 4, *Anticipated Supply Benefits of Projects and Management Actions*, indicates that the cumulative result of Group 1 through Group 3 PMAs would provide approximately 2,980 AFY of additional supply within the Santa Rosa Plain Subbasin. This table also shows that the individual supply benefits of each group of PMAs is larger than the proposed project's anticipated water demand of approximately 205 AFY; Group 1 PMAs would provide up to 1,800 AFY from use efficiency and alternate water sources, Group 2 PMAs would provide up to 240 AFY from stormwater capture and reuse, and Group 3 PMAs would provide up to 940 AFY from ASR projects.

In addition, as discussed in Section 3.4, *Is There a Current UWMP that Accounts for the Proposed Project's Water Demands*, and in Section 4, *Water Supply Sources*, the City of Cotati developed current water demand projections in 2020 that were used to inform Sonoma Water's 2020 UWMP. As discussed in Section 4.1, *Sonoma County Water Agency*, and specifically under "Supply Reliability Projections," Sonoma Water anticipates having sufficient supply available to meet all demands within its service area, including for the City of Cotati. Although there are projected shortfalls during single dry-year conditions in 2035, those are anticipated to be covered through collaborative conservation and demand reduction by Sonoma Water contractors, which has been a consistently successful strategy conducted during drought years to meet all necessary demands.

Furthermore, as discussed in Section 2.2, *Background*, under "2013 General Plan," the actual amount of water required to support uses in the City of Cotati in 2023 was approximately 297 AF less than projected it would be, based upon the originally approved project and the City's 2013 General Plan EIR. As discussed in Section 2.4, *Water Demands*, and specifically as presented in Table 2, *Water Demands Overview*, water demands associated with the proposed project are conservatively estimated to total 205 AFY. The proposed project's water demands are less than the difference between projected water demands and actual water demands within the City of Cotati in 2023, suggesting that sufficient water is available for the proposed project from existing sources.

Based upon the data and analysis presented in this WSA, sufficient water supply would be available for the proposed project over a minimum 20-year planning horizon, and including under normal-year, single dry-year, and multiple dry-year conditions.

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