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I am submitting comments on behalf of Napa Vision 2050 regarding the "Napa Valley Ground Water Sustainability-A Basin Analysis Report for the Napa Valley Subbasin" submitted to the Department of Water Resources (DWR) by Napa County on December 16, 2016. Napa County suggests that the basin is being managed sustainability and therefore no Groundwater Sustainability Agency nor Groundwater Sustainability Plan is required.

We do not agree for the following reasons.

§354.10 Notice and Communication

Napa County claims to have held numerous public meetings. They held meetings but they were not exactly robust town hall meetings. I was at several where there were just a few people in attendance. You should ask the county to provide data on the number of citizens who attended these meetings. Typically these meetings would have two presentations, one by the Natural Resources Conservation Manager and then by the county's engineering consultant, Luhdorff & Scalmanini. These slide presentations were voluminous, not readily comprehensible and typically took the entire allotted time: At one meeting 11/23/15 at the Napa Public Library, chaired by a County Supervisor, due to these prolonged presentations, there was no time for ANY public input or questions. Similarly at other so-called workshop meetings only three minutes of public comment was allowed per citizen and often the comments were not responded to. The feeling was that they were not seeking public input or discussion: It wasn't democracy in action.

§344.18 Water Budget

SGMA is intended to strengthen the connection between land use planning and water management. However, the report submitted by Napa County does not address likely future conditions: prolonged drought and increasing temperatures in California. Currently Napa County relies upon three sources of water:

- Ground Water (GW)
- Surface Water
- State Water Project (SWP) via the North Bay Aqueduct.

The Report states that groundwater pumping has provided a substantial contribution to the overall water supply for the Subbasin since at least the late 1980s. Land use mapping by DWR indicates that a shift occurred from predominantly surface water to groundwater as the source of supply for agriculture between 1987 and 2011. “Local supplies have also been augmented since 1968 by water imported for municipal use from the State Water Project along the North Bay Aqueduct and more recently through the use of recycled water”. Augmented is a curious word to use here as it does not reflect that SWP accounts for 50% of municipal water usage in Napa County today.

And more importantly, while residential units in the unincorporated county and agriculture are now the primary users of the GW, the report does not address the possibility of municipalities within the basin needing and using GW extraction to survive. Instead they use a model that says the cities will use surface water:

“...land use units within City water system boundaries of Napa and Yountville were modeled to be supplied by surface water, with the exception of a number of parcels near Yountville which are known to have been supplied by recycled water since 1977”. [Section 6.5.2/Page101 of the Napa County Report]

In the Napa Valley Subbasin, the U.S. Census Bureau indicates that the population is increasing, growing across all four of the incorporated municipalities in the Subbasin (City of Napa, City of St. Helena, City of Calistoga, and the Town of Yountville). And while Napa County’s second largest city, American Canyon, is not included in this Subbasin analysis, it must be considered in terms of the prolonged drought scenario that may require all municipalities to switch to GW. In order to protect its citizens, the county government is responsible for contingency planning.

SGMA requires that each agency shall establish a sustainability goal; specifically: Each Agency shall establish in its Plan a sustainability goal for the basin that culminates in the absence of undesirable results within 20 years of the applicable statutory deadline.

The report states that GW levels have been stable over the hydrologic base period (1988-2015). But as noted above, during this period of growth, significant quantities of water began to be obtained from the SWP to meet the needs of the municipalities. This suggests that the Subbasin system has not been truly sustainable.

During the recent prolonged drought, California has markedly lowered the SWP allocations and mandated water conservation measures from the municipalities and issued guidance documents such as, "Safeguarding California Implementation Action Plans 2016" to ensure that people and communities are able to withstand the impacts of climate disruption:

- "Loss of snowpack storage may reduce reliability of surface water supplies and result in greater demand on other sources of supply".
- "As climate change reduces water supplies and increases water demands (as a result of higher temperatures), additional stresses are being placed on the Delta and other estuaries along the California coastline."
- "Each local water agency will have to contend with impacts to their local watershed, as well as upstream and downstream watersheds that influence local water supply or water quality constraints."

This Napa County GW Report does not address the likely impact of prolonged hot, dry weather on the ability of the state to deliver SWP water; for the surface water sources in Napa to be able to supply sufficient pure water and therefore the impact of the (at least) four municipalities demanding GW to protect the health, safety and welfare of their citizens.

A sustainable yield analysis by Napa County established that the maximum amount of water that can be withdrawn annually from the Subbasin groundwater supply without causing an undesirable result is within 17,000 acre-feet-per year (AFY) to approximately 20,000 AFY. The average municipal use in the Subbasin has been 17,300 AFY over the 1988 to 2015 study period. Thus, this analysis predicts that if the municipalities were required to use GW, the Subbasin would become unsustainable.

At the hearing on this Report (Agenda item 9A) before the Napa County Supervisors on December 13, 2016 using data from the consultant's slide presentation, I raised concerns about how the county would protect the health, safety and welfare of its citizens if the projected water budget were on the negative side as the consultant presented data slides which do not appear in the final report that showed a projected water budget (2016-2025) deficit of 14,300 AFY, projected for hot and low rainfall conditions. There was also an assumption made that the State Water Project allocation remains at an average of 42%. This doesn't seem realistic as the allocation has been dramatically cut in recent years to as low as 5%. I raised the possibility of our municipalities needing to use ground water for their supplies under these conditions. No one, no Supervisor nor Public Works employee attempted to answer these issues and none have provided answers as of the submission of this comment letter.

It is important to note that, in earlier county documents the possible need for GW use by municipalities was discussed, and apparently forgotten. In November 15,

2005 a report, “2050 Napa Valley Water Resources” prepared by West Yost & Associates was presented to Napa County Flood Board:

“As municipalities consider potential increases in GW use, they should exercise caution, so that they do not adversely impact existing GW users”.

“An increase in Unincorporated [Water] Demands is possible, primarily due to an increase in vineyard demand [due to densification of vineyard plantings].” Various scenarios for municipal water supplies were presented that showed shortfalls by 2020 or 2050. To mitigate these shortfalls it was suggested that they use GW, purchase entitlements from other cities, purchase additional SWP entitlements, construct additional municipal GW wells, recycle water.

In response to the 2014 Sustainable Groundwater Management Act, Napa County has submitted an Alternative Submittal, Basin Analysis Report, where an analysis of basin conditions presumes to demonstrate that the basin has operated within its sustainable yield over a period of at least 10 years. However, this has been accomplished through extensive utilization of state surface water by the municipalities as they used less surface water. This suggests an unsustainable water balance especially as hotter, drier weather is forecast.

Napa County Grand Jury Report

In addition to the 2005 report cited above, it must be further noted that the Napa County Grand Jury issued a report, “Management of Ground Water and Recycled Water: Is Napa County in Good Hands?” on March 31, 2015. [They] investigated Napa County’s management of groundwater for the following reasons:

- Continued drought
- Napa County’s reliance on agriculture and its need for water
- Many newspaper articles expressing concern over increased development and asking, “Where will the water come from?”

Despite the efforts by the County, this Grand Jury does have some concerns that we believe need to be addressed:

- The differences between what the well drillers and the geologist stated and what the County believes is happening on the Valley floor with respect to groundwater levels and aquifer recharge.
- Most well owners have groundwater extraction limits that cannot be enforced by the County. With the exception of the MST, their groundwater usage is not monitored, even for large water users. There are provisions in the new SGMA that would allow the local agency to impose fees to fund the costs of groundwater management, including the costs of monitoring users’ groundwater usage.

- The County does not have a groundwater management contingency plan in place should the drought continue.

This Grand Jury would stress that there are some troubling issues and that the County would be better served planning for a potential future disaster vs. waiting for it to happen and then trying to put a plan together quickly. Citizens should expect their governmental officials to be prepared for all potential outcomes and have procedures or policies in place that they may rely on when needed.

Grand Jury RECOMMENDATIONS – GROUNDWATER

R1. By December 31, 2015, the Napa County Public Works Department to develop a contingency plan, approved by the Board of Supervisors, that lays out the major steps to be taken in the event of severe drought conditions.

R2. By June 30, 2016, the Napa County Public Works Department to require major groundwater users to meter and report their water usage on a quarterly basis to ensure all well owners are following prescribed usage rates.

R3. By June 30, 2016, the Napa County Public Works Department to adopt policies to encourage all other groundwater users to meter and monitor their well water usage.

The Board of Supervisors responded that they would evaluate these recommendations, in the context of the Alternate Groundwater Sustainability Plan in their correspondence with the Superior Court Judge Stone on August 11, 2015 as can be seen:

Recommendation No. 1: By December 31, 2015, the Napa County Public Works Department to develop a contingency plan, approved by the Board of Supervisors, that lays out the major steps to be taken in the event of severe drought conditions.

Board of Supervisors' Response: The recommendation will be implemented in the context of the Alternative Groundwater Sustainability Plan, due to the State between June 30, 2016 and January 1, 2017.

Recommendation No. 2: By June 30, 2016, the Napa County Public Works Department to require major groundwater users to meter and report their water usage on a quarterly basis to ensure all well owners are following prescribed usage rates.

Board of Supervisors' Response: The recommendation requires further analysis. This recommendation will be considered in the context of the Alternative Groundwater Sustainability Plan, due to the State between June 30, 2016 and January 1, 2017. Development of the plan will include significant outreach to and input from the public. The Board of Supervisors will consider and determine the necessary amount of metering and reporting in the context of this public discussion.

Recommendation No. 3: By June 30, 2016, the Napa County Public Works Department to adopt policies to encourage all other groundwater users to meter and monitor their well water usage.

Board of Supervisors' Response: The recommendation requires further analysis. This recommendation will be considered in the context of the Alternative Groundwater Sustainability Plan, due to the State between June 30, 2016 and January 1, 2017. Development of the plan will include significant outreach to and input from the public. The Board of

Supervisors will consider and determine the necessary amount of metering and reporting in the context of this public discussion.

§354.34 Monitoring Networks

However, the Supervisors have not developed a contingency plan regarding GW allocation in the face of a prolonged water emergency affecting this Subbasin.

The Supervisors had promised the Grand Jury and the Superior Court significant outreach to and input from the public on Grand Jury Recommendations 2 and 3 regarding water metering and monitoring. No one can say that there has been significant outreach to the public on this topic or the Basin Analysis Report as evidenced by the non-existent turnout at "public" sessions. There is no plan to meter and monitor GW usage.

Conclusion

We appreciate the opportunity to comment on the Alternate Submittal proposed by Napa County. Napa Vision 2050 asks that you do not approve the Report as it does not address the likely scenario of prolonged drought conditions in the state and the Subbasin which will likely culminate in undesirable results within 20 years. It does not address how the municipalities, with the largest populations centers, are to survive if the SWP supplies and surface supplies are curtailed and/or degraded in their quality.

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