



napa valley vintners

Planning Commission Mtg.

APR 01 2015

Agenda Item # 10A

March 26, 2015

Mr. Steve Lederer  
Director, Napa County Department of Public Works  
County Administration Building  
1195 Third Street, Suite 101  
Napa, CA 94559

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Napa County Planning, Building  
& Environmental Services

**Re: Water Availability Analysis Comments**

Dear Mr. Lederer:

On behalf of the Napa Valley Vintners, thank you for the continued opportunity to participate in the ongoing discussion of the proposed changes to the Water Availability Analysis (WAA). We appreciate the thoughtful response to initial comments and newly proposed revisions to the document. As we have indicated in previous discussions, public meetings and through a formal endorsement by the NVV Board of Directors, we strongly support Napa County's proactive approach to watershed management. We believe the proposed changes to the WAA to be timely, further supporting the County's long-term solutions and GRAC recommendations. **We are supportive of the newly incorporated changes and encourage the following further refinements:**

- **Statements of Inter-County Coordination:** Situations are likely to arise where a proposed project may have potential impacts to an adjacent property located outside of Napa County. The WAA should include a general reference to coordinating with adjacent counties and other relevant jurisdictions in these situations, so that the impact of water wells developed on one side of a jurisdiction line do not adversely impact those existing wells on the opposite side of the same line.
- **Tier 2 Requirements - Common Ownership:** The response to Comment 1.3 states that Tier 2 analysis will not be required if the two contiguous parcels have *identical* ownership. Ownership of parcels within a parent company may not always have identical ownership listings. To reflect this common business practice, Tier 2 analysis should not be required if the two continuous parcels are under "common" ownership.

Policy tools that appropriately and effectively guide water use throughout our county are essential to protecting our agricultural present and future. We appreciate the thoughtful work of the county to make the WAA a strong example of an effective policy tool that makes sense both on paper and in application. We look forward to continuing to work with the county on future efforts.

Respectfully submitted,

Michelle Novi  
Industry Relations Manager  
Napa Valley Vintners

Cc: Napa County Planning Commission



## NAPA COUNTY FARM BUREAU

811 Jefferson Street Napa, California 94559 Telephone 707-224-5403 Fax 707-224-7836

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Napa County Planning Commission  
1195 Third St.  
Napa, CA 94559

Agenda Item # 104

RE: Revisions to Water Availability Analysis Procedures

Dear Commissioners,

On behalf of the 775 members of Napa County Farm Bureau, we offer the following comments on the proposed revisions to the Water Availability Analysis (WAA) procedures. We applaud Napa County for being proactive in developing groundwater monitoring programs and taking additional steps to sustain groundwater resources in our community.

In general, we support the county's effort to update the WAA to provide a better process to comply with CEQA regulations in assessing groundwater impacts of proposed discretionary projects. Given the complexity and emerging nature of the science and policies for assessing groundwater availability, recharge and groundwater to surface interactions, we urge the county to proceed cautiously. We recommend flexibility in implementation and scheduling a thorough review of the new procedures one year after approval of the revised WAA.

NCFB reiterates these points that we stated in our testimony at the Planning Commission's January 7, 2015 public hearing:

- The WAA's goal should be improved oversight of groundwater resources without burdensome regulation. But the complexity of the WAA, particularly for Tier 3, creates an expensive and challenging process, and indeed seems to set up a process for a battle of experts in interpreting and deriving conclusions from hydrogeological data.
- We urge the county to consider the establishment of a water resources ombudsman position, with access to well driller logs, to facilitate and mediate neighbor disputes and reduce the potential for costly and lengthy legal battles.
- The WAA should explicitly acknowledge and protect overlying groundwater rights while providing a clear process for assessing fair share or correlative rights.

Napa farmers and ranchers are committed to "best practices" for protecting water resources and we will continue to provide input to assist the county in refining policies and procedures related to water use. Thank you for the opportunity to comment.

Sincerely,

Jim Lincoln  
NCFB Natural Resources Committee Chairperson