



San Francisco Bay Regional Water Quality Control Board

November 21, 2016

Sent via electronic mail: No hard copy to follow

Mr. Patrick Lowe
Natural Resources Conservation Manager
Napa County Department of Public Works
804 1st St.
Napa, CA 94559
Email: Patrick.Lowe@countyofnapa.org

Subject: Water Board Comments on the October 2016 Draft *Napa Valley Groundwater Sustainability-Basin Analysis Report*

Dear Mr. Lowe:

The San Francisco Bay Regional Water Board appreciates the opportunity to provide comments on Napa County's October 2016 draft *Napa Valley Groundwater Sustainability-Basin Analysis Report* (Basin Analysis Report). We recognize and support Napa County's efforts to sustainably manage groundwater resources in the Napa Valley to guard against undesirable results that could threaten beneficial uses. Our comments, provided in the attachment, are focused on improving these efforts to better protect all beneficial uses in the Napa Valley, including groundwater contributions to stream base flow necessary to support spring and fall fish migration and summer rearing.

We appreciate your consideration of our comments prior to the Napa County Board of Supervisors special meeting on December 13. Please don't hesitate to contact me (510-622-2756; yemia.hashimoto@waterboards.ca.gov), or Dyan Whyte (510-622-2441; dyan.whyte@waterboards.ca.gov) if you have any questions.

Sincerely,

Yemia Hashimoto
Engineering Geologist
Groundwater Protection Division

Cc:
Alec Naugle; alec.naugle@waterboards.ca.gov
Dyan Whyte; dyan.whyte@waterboards.ca.gov

Attachment
Water Board Comments on Draft Napa Valley Basin Alternative Report

Comment 1, Data Gaps: We concur with Section 10.2 recommendations in the Basin Analysis Report that groundwater monitoring gaps be addressed. Our concern is that if these data gaps are not addressed, Napa County would not be able to identify future Study Areas, as is described in Section 7.6. Therefore, please indicate if specific locations are currently prioritized for monitoring, and/or how these locations would be identified. For example, we note data gaps in the northern region, near Calistoga, including Napa River tributaries, where the monitoring network is much less dense. Please consider focusing future investigation/monitoring to address data gaps in the Dry, Milliken, Sulphur, Mill, and Richie Creek tributary areas, which are of particular interest for preservation of groundwater base flow and aquatic species habitat.

Comment 2, Management Areas: We recognize that the County has identified a Study Area that overlaps a portion of the southeastern Napa Valley Subbasin and the MST area, where future growth and activity is anticipated. Please explain the difference between a Study Area and a Management Area. Please also explain if/how the approach to investigate or manage these areas is affected by Napa County's decision to not form a SGMA Groundwater Sustainability Agency (GSA) for the Napa Valley Subbasin.

Comment 3, Undesirable Results, Minimum Thresholds: We concur with the statement in the Basin Analysis Report that the "river system is considered the most sensitive sustainability indicator in the Napa Valley Subbasin" and that the historical occurrence of diminished stream base flow could be considered an undesirable result. Because this undesirable result is a pre-SGMA condition, the Basin Analysis Report recommends measurable objectives and minimum thresholds to protect against only future undesirable results. Therefore, the report should elaborate on the details of the minimum thresholds for protecting against future worsening of this undesirable result. For instance, the report states that the minimum threshold is not a long term value, but did not provide sufficient exceedance timeframe details. What is the time interval within which it is acceptable for the minimum threshold to be exceeded, and how is it determined? Furthermore, the report should explain the consequences of a minimum threshold exceedance (i.e., if there is an exceedance, what is the next step?) and the difference between a GSA and non-GSA entity's ability to respond to an exceedance of threshold values, and implement a corrective action, if any.

Comment 4, Future Assumptions: The report should elaborate on how other stakeholders are obligated to follow any of the Basin Plan Report requirements, considering there is no GSA. It should also address the following:

- How were recycled water and future stormwater projects addressed and how might they affect future management of the Basin in terms of water quantity (i.e. water levels) and water quality?
- How was climate change addressed and might it affect future basin management and sustainability?
- What assumptions were made about future increases in groundwater use? If groundwater is fully allocated, how will the Napa Valley Subbasin address additional land use changes that create demands on additional groundwater extraction? What land use and population growth assumptions were included?

Attachment
Water Board Comments on Draft Napa Valley Basin Alternative Report

Comment 5, Monitoring: We believe the Basin Analysis Report should provide a commitment to continually improving the Napa Valley monitoring network and refining baseline conditions. We note that the threshold monitoring network is comprised of 18 representative monitoring sites; however, 113 groundwater level, 81 groundwater quality, and 5 groundwater-surface water interaction cluster wells are also monitored. Please consider including a process for nominating additional representative monitoring wells based on data gaps and uncertainties related to specific monitoring objectives and minimum thresholds and other criteria to detect potential undesirable results.

Comment 6, Reporting: Please explain how the monitoring data, inclusive of threshold and baseline data, is to be made available to agencies such as ours, and/or the public.