

# GROUNDWATER SUSTAINABILITY PLAN ADVISORY COMMITTEE

## MEMO

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**TO:** Napa Valley Subbasin Groundwater Sustainability Plan Advisory Committee

**FROM:** LUHDORFF & SCALMANINI, CONSULTING ENGINEERS (LSCE)

**SUBJECT:** Comments Received on Draft Sections 4 and 5 of the Napa Valley Subbasin Groundwater Sustainability Plan (GSP)

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### SUMMARY

This Memo provides a brief summary of comments received on Draft Section 4 (dated October 1, 2020) and Draft Section 5 (dated September 30, 2020) of the Napa Valley Subbasin GSP. This Memo summarizes comments received from members of the Groundwater Sustainability Plan Advisory Committee (GSPAC) and the public through October 20, 2020, the initial comment period.

The Napa County Groundwater Sustainability Agency (NCGSA) received 14 survey responses from members of the GSPAC and members of the public. Sections 4 and 5 will be revised to integrate survey feedback as appropriate. A revised Draft Section 4 is planned to be provided before the Committee's December meeting. A revised Draft Section 5 is planned to be completed in Spring 2021 at the conclusion of the extended comment period on monitoring network data gaps. The public will have an additional opportunity to provide input on the compiled draft GSP when it is released in Fall 2021.

### DISCUSSION

Draft Section 4 of the GSP provides a narrative and graphical description of the physical and geological setting of the Napa Valley Subbasin. The physical and geologic setting are presented as a Hydrogeologic Conceptual Model (HCM)<sup>1</sup> that informs the interpretation of monitoring data, water budget development and mathematical modeling, and sustainable management criteria development, as well as evaluate projects and management actions described in the GSP. Additionally, Section 4 includes a description of the topography, soil characteristics, geologic setting, principal aquifers, surface water features and interconnections with groundwater, groundwater recharge and discharge areas, sources and points of delivery of imported water supplies, and HCM data gaps. Draft Section 5 describes the monitoring network for the Subbasin that will promote the collection of data of sufficient quality, frequency, and distribution to characterize groundwater and related surface water conditions in the basin and evaluate changing conditions that occur through implementation of the GSP.

Drafts of Sections 4 and 5 were released on October 2, 2020 for public review and comment. Using the Napa County Groundwater Sustainability Agency's (NCGSA's) SurveyMonkey platform, 14 responses were received during the initial comment period from 10/2/20 to 10/20/20. Two responses were received after 10/20/20; these will be considered later during the review process for the draft GSP. The technical team at Lohdorff & Scalmanini Consulting Engineers (LSCE) reviewed all comments, including those from GSPAC members and others. Comments were considered and are being addressed according to four main categories: 1) editorial (including text and figure edits); 2) comments pertinent to the objectives of Sections 4 and 5; 3) general comments of interest but not directly pertinent to the objectives of Sections 4 and 5; and 4) comments pertinent to future GSPAC discussions and one of more future GSP sections.

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<sup>1</sup> "Hydrogeologic conceptual model" means a description of the geologic and hydrologic framework governing the occurrence of groundwater and its flow through and across the boundaries of a basin and the general groundwater conditions in a basin or subbasin. (23 CCR §341(q)).

Of the responses received within the requested period the five most common self-selected affiliations of respondents were domestic well owners, the general public, the business community, surface water users, and public water systems. The comments reflect an overall agreement that Draft Section 4 provides a general understanding of the physical and geologic setting, with 58% (8) in strong agreement, 21% (3) in moderate agreement, and 7% (1) in slight agreement. The comments also reflect an overall agreement that Draft Section 5 provides a clear description of the GSP monitoring networks, with 31% (4) in strong agreement, 38% (5) in moderate agreement, and 8% (1) in slight agreement.

Nine substantive comments were received relating to the scope and completeness of Section 4. Some comments provided helpful clarifications, corrections, and comments regarding opportunities to clarify the text. Other comments noted that the draft provides a thorough presentation of the HCM. Commenters requested clarification of aspects of the HCM including, the extent of interconnected surface waters in the Subbasin, the characterization of mountain block recharge and subsurface outflow, and the role of deep percolation of applied water as a source of recharge to the Subbasin. One commenter requested clarification regarding the potential for wildfires to increase rates of erosion in the Napa River Watershed, and the potential impacts on groundwater recharge in the Subbasin due to sediment transport and deposition.

Five substantive comments were received relating to the description of GSP monitoring networks of Section 5. Several commenters supported the need to refine monitoring networks over time to address data gaps, particularly relating to monitoring interconnected surface water and groundwater. Other commenters noted the potential availability of monitoring data, including groundwater level data, groundwater pumping data, and LiDAR data, from public and private sources that may help address some data gaps described in Section 5.

Five substantive comments were also received relating to the characterization of beneficial uses and users of groundwater by the GSP monitoring networks described in Section 5. Commenters requested additional details relating to the description of agricultural users and users of interconnected surface waters as beneficial users. Another comment, applicable to a subsequent GSP section, noted the need for the GSP to clearly link beneficial uses and users of groundwater to sustainability criteria.

Sections 4 and 5 will be revised to integrate survey feedback as appropriate. A revised Draft Section 4 is planned to be provided before the Committee's December meeting. A revised Draft Section 5 is planned to be completed in Spring 2021 at the conclusion of the extended comment period on monitoring network data gaps described at the October 8 GSPAC meeting. The survey for Draft Sections 4 and 5 will remain open and accessible on County websites, including the Watershed Information and Conservation Council website and the NCGSA website currently under development. The public will have an additional opportunity to provide input on the compiled draft GSP when it is released in Fall 2021.