Date	Commenter		Comment	Response
September 22, 2016	Gary Margadant (Verbal comment at WICC Workshop)	1.1	Gary Margadant referred to the Napa County Grand Jury Report 2014-15 and commented that the report said the County had no groundwater contingency plans for the drought and no means of monitoring groundwater usage.	Regarding Finding F1 from the Napa County Grand Jury report "Management of Groundwater and Recycled Water: Is Napa County in Good Hands?" (dated March 31, 2015). The Napa County Board of Supervisors' Response (dated June 2, 2015) notes that "the County has invested significant resources to ensure an adequate understanding of our groundwater resources. This is evident in the Napa County Comprehensive Groundwater Monitoring Program 2014 Annual Report and CASGEM Update….The monitoring program provides an 'early warning system' to provide sufficient time to respond should a significant problem develop." The response continues by noting the County's decision to develop this Basin Analysis Report as an Alternative to a Groundwater Sustainability Plan. With respect to the Napa Valley Subbasin, the Basin Analysis Report identifies representative monitoring sites that will be used to monitor sustainability indicators including: chronic lowering of groundwater levels, reduced groundwater storage, seawater intrusion, degraded groundwater quality, land subsidence, and streamflow depletion. Minimum thresholds (in feet above mean sea level) to avoid chronic lowering of groundwater levels, land subsidence, reduced groundwater storage, and streamflow depletion are provided in the Basin Analysis Report for sixteen representative monitoring sites (and one additional representative monitoring site that is too far from the Napa River and is not used for streamflow depletion); minimum thresholds to avoid degraded groundwater quality (e.g., for nitrate) are provided in this document for seven representative monitoring sites; a minimum threshold to avoid seawater intrusion is provided in this document for one representative monitoring site (for TDS concentration). Measurable objectives, or specific quantifiable goals for maintaining or improving groundwater conditions, are provided in the Basin Analysis Report for streamflow depletion and other sustainability indicators, again using 16 of the representative monitoring sites. The measurable objective to maintain or improve groundwater quality is set for seven representative monitoring sites; for one representative monitoring site to avoid seawater intrusion; and for 17 of the representative monitoring sites for avoiding chronic lowering of groundwater levels, reducing groundwater storage, and land subsidence. Outside the Napa Valley Subbasin, the County has implemented conditions for monitoring groundwater usage, when warranted, for discretionary projects that use groundwater as a source of supply. The Sustainable Groundwater Management Act of 2014 (SGMA) does not require that the County, or any agency, monitor all groundwater use in its jurisdiction in order to achieve sustainability of groundwater resources.
September 22, 2016	Gary Margadant (Verbal comment at WICC Workshop)	1.2	Mr. Margadant mentioned the Petra Dr. area and development of a winery in the area. Mr. Margadant would like a comparison of the Petra Dr. area to that of the hillside areas, and noted the 1 ac/ft/ac/year water allotment on the valley floor. He also noted that there are 13 wells along Petra Dr. within 500' of the proposed winery development. Mr. Margadant said there is no monitoring well nearby.	Water levels in northeastern Napa Subarea wells monitored by the County east of the Napa River have stabilized since 2009, though declines were observed over approximately the prior decade. To ensure continuation of the current stable groundwater levels, a further study in this area was approved by the Napa County Board of Supervisors. The study is designed to examine existing and future water use in the area, sources of groundwater recharge, and the geologic setting to address questions regarding the potential for long-term effects. The study will also investigate the potential influence of previously documented groundwater cones of depression in the MST subarea on the Study Area both east and west of the Napa River. The County will evaluate the study results to determine if potential groundwater management measures or controls (similar to those that have been successfully implemented in the MST) or a Management Area designation are warranted. The County's monitoring network includes two wells (Napa County Wells 182 and 228) on Petra Drive. Regarding the recent approval of a winery use permit modification request (the modification of an existing winery) near Petra Drive was "approvable" from a groundwater perspective because the modification actually proposed a decrease in groundwater use. The County recognizes there are several other proposed projects and modifications to existing projects in this area. These projects are all being requested to demonstrate "no net increase" in groundwater, or a reduction in use. Those that cannot achieve that standard are being required to do additional studies beyond the normal valley floor Tier 1 standard in order to prove that adequate groundwater is available.

September 22, 2016	Gary Margadant (Verbal comment at WICC Workshop)	1.3	Mr. Margadant also mentioned the 2015 monitoring report and 108 wells, of which 61 are less than two years old; concluding that 56% of the wells do not come close to the 10 year period that is required for looking at sustainability.	The Basin Analysis Report provides, in Chapter 3, a list of currently monitored wells and their periods of record. In addition, dozens of additional wells have been monitored in the Napa Valley Subbasin and Napa Valley Floor at various times in the past and provide data that have been used to understand historical conditions, as described in the 2011 Napa County Groundwater Conditions and Groundwater Monitoring Recommendations Report that is among the appendices to the Basin Analysis Report. While the County has worked to expand its monitoring network in recent years to address data gaps, that effort does not imply that previously available data are not useful for understanding conditions in the Subbasin. The state regulations for Groundwater Sustainability Plans (GSPs) and Alternatives to GSPs specifically call for using the best available data to evaluate sustainability, while acknowledging that data gaps may be present. The state regulations also define sustainability in terms of conditions present throughout a basin or subbasin, in part to avoid over reliance on any single measurement which may reflect a localized or temporary condition (e.g., temporary groundwater level drawdown resulting from a nearby well). The Basin Analysis Report identifies representative monitoring sites for monitoring sustainability indicators throughout the Subbasin now and into the future. Of those, 7 monitoring sites have periods of record from at least 1988 to present. 10 additional dedicated monitoring sites have been monitored since 2014. Going forward, a total of 18 representative monitoring sites will be monitored to achieve measurable objectives, or specific quantifiable goals for maintaining or improving groundwater conditions, and to inform the five-year updates of the Basin Analysis Report. As reported in the *Napa County Comprehensive Groundwater Monitoring Program, 2015 Annual Report and CASGEM Update*, there are 113 sites monitored in Napa County, by the County, DWR, and others. The monitoring network is continually being evaluated to assess additional data needs to ensure groundwater resources sustainability. Chapter 10 of the Basin Analysis Report presents recommendations for focused areas where additional groundwater monitoring is recommended.
September 22, 2016	Gary Margadant (Verbal comment at WICC Workshop)	1.4	Mr. Margadant mentioned recharge, saying the RCD has changed its position on deep ripping, concluding it changes recharge rate due to changes in the soil properties and compaction.	The USDA Natural Resources Conservation Service sent a letter to the Napa County Resource Conservation District in June, 2016, giving recommendations on changing Hydrologic Soil Groups after the ripping of shallow soils. The summary of finding states “that upon ripping to 36 inches deep the Hydrologic Soil Group (HSG) of the following soils would change from D to C: Hambright, Lodo, Maymen and Millsholm. The HSG for the Kidd soil would change from D to B. Increases in (ripped) soil depth from less than to more than 20 inches can change HSG even without changes in saturated hydrologic conductivity (Ksat)”; In general, ripping can lower the potential for runoff, and increase the rate of infiltration. The Sustainable Yield Analysis that is presented in the Basin Analysis Report includes a Subbasin Water Budget that already assumes runoff to be negligible within the Subbasin due to the flat topography and soil saturated hydraulic conductivity values that are generally higher than average monthly precipitation by more than an order of magnitude. The soils mentioned in the letter by NRCS do not generally occur in the Subbasin, but in the surrounding hillsides/uplands. In the Subbasin Water Budget, runoff from upland areas is represented by the mass balance modeling approach of the USGS California Basin Characterization Model (BCM). The BCM does utilize the NRCS soil data to estimate available soil-water storage, but does not utilize the Hydrologic Soil Group which is used to associated runoff curve numbers.
September 22, 2016	Gordon Evans (Verbal comment at WICC Workshop, and 10/28/16 letter to WICC Board of Directions, Re: WICC Special Meeting 9/22/16)	1.5	Gordon Evans, Atlas Peak Rd., noted that there are a number of wells in decline and 3 total failures in the last couple of years. Mr. Evans said to look at the Napa Valley subbasin only is myopic and doesn’t take into account the recharge the MST “basin” and hillside watersheds provide to the lowest aquifer in the subbasin.	Water levels in northeastern Napa Subarea wells monitored by the County east of the Napa River have stabilized since 2009, though declines were observed over approximately the prior decade. To ensure continuation of the current stable groundwater levels, a further study in this area was approved by the Napa County Board of Supervisors. The study is designed to examine existing and future water use in the area, sources of groundwater recharge, and the geologic setting to address questions regarding the potential for long-term effects. The study will also investigate the potential influence of previously documented groundwater cones of depression in the MST subarea on the Study Area both east and west of the Napa River. The majority of the MST is located outside a DWR-designated groundwater basin. The County will evaluate the study results to determine if potential groundwater management measures or controls (similar to those that have been successfully implemented in the MST) or a Management Area designation are warranted. The Sustainable Groundwater Management Act requires GSPs or Alternatives for medium and high priority groundwater basins as delineated and ranked by the State Department of Water Resources (DWR). The hillsides do not fall within the Napa Valley Subbasin that DWR has delineated. However, the hillsides are included in the Napa Valley Subbasin water budget by

				incorporating uplands runoff and subsurface inflow. Because the hillsides do not act as a basin, but instead as thousands of discrete subareas based on local geography, it is not scientifically or economically practical to "study the hillsides".
September 22, 2016	Gordon Evans (Verbal comment at WICC Workshop, and 10/28/16 letter to WICC Board of Directions, Re: WICC Special Meeting 9/22/16)	1.6	Mr. Evans mentioned the conclusion and recommendations in the Grand Jury 2014-15 Report and the Board of Supervisor's responses; saying the conclusions and the recommendations by the Grand Jury have largely not been followed by the Board of Supervisors and no contingency plans are in place for groundwater like there are for earthquakes and floods.	See response to 1.1
September 22, 2016	Gordon Evans (Verbal comment at WICC Workshop, and 10/28/16 letter to WICC Board of Directions, Re: WICC Special Meeting 9/22/16)	1.7	Mr. Evans stated that even if one assumes that the groundwater models show there is no current groundwater deficiency there is no monitoring beyond the subbasin and the Board of Supervisors response has been "will include significant outreach and input from the public." Mr. Evans said contrary to statements by Patrick Lowe, no one has been in contact with him despite repeated inquiries to Mr. Lowe and Jeff Sharp over the years.	Wells in the CASGEM monitoring network are a subset of the larger Napa County network and are distributed across all five Napa Valley Floor Subareas (Calistoga, St. Helena, Yountville, Napa, and MST), as well as the Carneros, Angwin, Eastern Mountains, and Western Mountains Subareas. The Basin Analysis Report identifies representative monitoring sites for monitoring sustainability indicators throughout the Subbasin. Going forward, these 18 representative monitoring sites will be monitored to achieve measurable objectives, or specific quantifiable goals for maintaining or improving groundwater conditions, and to inform the five-year updates of the Basin Analysis Report. The other approximately 95 wells in the County that are monitored will also continue to be monitored, and groundwater conditions will be repeated annually to the County Board of Supervisors. Mr. Evans was contacted by Napa County regarding groundwater questions and the voluntary well monitoring network on September 25, 2015, September 30, 2015, October 27, 2015, and October 29, 2015. The Napa Resource Conservation Dist. (RCD) contacted Mr. Evans regarding participation in the groundwater self-monitoring program on June 16, 2016. Napa County has followed up with Mr. Evans on October 19, 2016, October 21, 2016 and October 26, 2016. Mr. Evans well site was visited by County and RCD staff on October 24, 2016 to measure his well and calibrate a sonic level measuring device so that he can self-monitor his well in the future. The County will continue to solicit input from the public on future updates of the Basin Analysis Report.
September 22, 2016	Gordon Evans (Verbal comment at WICC Workshop, and 10/28/16 letter to WICC Board of Directions, Re: WICC Special Meeting 9/22/16)	1.8	Mr. Evans quoted the 2014-15 Grand Jury report: "In contrast to the County's position, the well drillers reported that wells on the Valley floor must be drilled to depths of 300-750 feet and in some cases over 1,000 feet to find water vs. a drilling depth of 100-200 feet or less in previous years. They still find water on the Valley floor 90-95% of the time, just at lower depths. The well drillers agree that it is far less certain that water will be found on the county's hillsides. Drillers that were interviewed said finding water there is a 50-50 proposition and that reports of wells drying up are not uncommon." Mr. Evans said that common sense and experience tell us water flows downhill. Mr. Evans stated that the MST "basin" is in	Overall groundwater levels in the main Napa Valley Subbasin have been stable for decades. Groundwater conditions outside the Napa Valley Subbasin are more variable, such as in the Milliken-Sarco-Tulucay area and in Hillside areas. In addition to the effects of the recent drought, the productivity of an individual well can depend on a number of things including the depth and serviceable life of the well, local aquifer properties, and amount and rate of nearby pumping from surrounding wells. In limited areas, such as the northeastern Napa Subarea, where groundwater levels have declined, or where seasonal variability is high, newer wells may be deeper to produce at dependable rates. Water levels in northeastern Napa Subarea wells monitored by the County east of the Napa River have stabilized since 2009, though declines were observed over approximately the prior decade. To ensure continuation of the current stable groundwater levels, a further study in this area was approved by the Napa County Board of Supervisors. The study is designed to examine existing and future water use in the area, sources of groundwater recharge, and the geologic setting to address questions regarding the potential for long-term effects. The study will also investigate the potential influence of previously documented groundwater cones of depression in the MST subarea on the Study Area both east and west of the Napa River. The County will evaluate the study results to determine if potential groundwater management measures or controls (similar to those that have been successfully implemented in the MST) or a Management Area designation are warranted. With regards to the MST, it is in fact one of the most monitored areas of the county, with data dating back many decades. There are significant land use controls in place in the area (the county has not approved a discretionary project in the MST

			depletion and continues to decline with no groundwater management planning.	that couldn't meet the "no net increase" standard since 2004), and significant effort has gone into constructing a recycled water pipeline to the area, that became operational just this year. While the MST area is far from recovered, data indicates a stabilization of water levels in most areas, and it is hoped that the recycled water will continue this recovery. The County will not be in a position to relax the strict land use standards and groundwater permit requirements in the area until it does.
September 22, 2016	Gordon Evans (Verbal comment at WICC Workshop, and 10/28/16 letter to WICC Board of Directions, Re: WICC Special Meeting 9/22/16)	1.9	Mr. Evans believes we do not qualify for a SGMA plan alternative because we do have more than ten years of undesirable results as previously defined, especially in areas around and feeding the Subbasin.	In response to the 2014 Sustainable Groundwater Management Act, Napa County has prepared this Alternative Submittal, Basin Analysis Report, per the requirements of Water Code Section 10733.6 (b)(3) where an analysis of basin conditions demonstrates that the basin has operated within its sustainable yield over a period of at least 10 years. The Basin Analysis Report will be submitted to the State Department of Water Resources (DWR) for evaluation. DWR will issue a written assessment of the Report which will include a determination of the status of the Report (i.e. approved, incomplete, or inadequate).
September 22, 2016	Gordon Evans (Verbal comment at WICC Workshop, and 10/28/16 letter to WICC Board of Directions, Re: WICC Special Meeting 9/22/16)	1.10	Mr. Evans said the hills and the upper watersheds need management and must be included with any groundwater sustainability planning because if one doesn't manage those recharge areas, especially those being deforested, one is not managing for long-term sustainability.	The Sustainable Groundwater Management Act requires GSPs or Alternatives for medium and high priority groundwater basins as delineated and ranked by the State Department of Water Resources (DWR). The hillsides do not fall within the Napa Valley Subbasin that DWR has delineated. However, the hillsides are included in the Napa Valley Subbasin water budget by incorporating uplands runoff and subsurface inflow. Because the hillsides do not act as a basin, but instead as thousands of discrete subareas based on local geography, it is not scientifically or economically practical to "study the hillsides" However, Napa County does have significant land use controls in the hillsides, including large minimum parcel sizes (generally 160 acres), use restrictions, and CEQA evaluations required of all discretionary projects. The Planning, Building, and Environmental Services Department (PBES) and the Board of Supervisors will continue to monitor land uses and may or may not choose to make changes regarding tree removal and other uses. However, changes to these land use controls are not required in order to complete this basin analysis.
September 22, 2016	Scott Sedgley (Verbal comment at WICC Workshop)	1.11	Mr. Sedgley added that as we move into the future, the hillsides need to be brought into the same scrutiny, particularly those sensitive areas surrounding our reservoirs, and pledged to work on improving ordinances affecting conditions in those areas. … there is more to be done to include the entirety watershed including both groundwater and surface water.	The 2017 bi-annual Napa County Watershed Symposium will be a focused effort to bring together watershed experts to explore the hillside area issues regarding groundwater and water quality concerns.
September 22, 2016	Kenneth Leary (Verbal comment at WICC Workshop)	1.12	Mr. Leary noted that every well should be monitored and that everyone should participate, whether they want to or not, in order to grow the scope of our understanding.	While SGMA could provide the Board the authority to regulate each individual and municipal well, such action is not supported as being needed by the existing data. "Every well" is not needed for a comprehensive monitoring plan. Outreach for monitoring is conducted continually by the County and each potential monitoring well is sent to the County's groundwater consultant to assess if the well would meet specific objectives of the monitoring program. Additional wells are not needed in some areas where existing geographic coverage is sufficient. The County is working with the Resource Conservation District to promote the use of sonic self-monitoring instruments and is training and assisting well owners on the use of the devise so they can borrow a portable unit from the County (http://www.napawatersheds.org/app_pages/view/7819). In order to ensure that the County does have all the needed coverage, proposed recommendation number 23 requires that project wells associated with new discretionary permits be made available to the County monitoring program upon request.

September 22, 2016	Susan Boswell (Verbal comment at WICC Workshop)	1.13	Susan Boswell said we need more quantifiable data in regard to best management practices that are already currently in place, and that this applies not only to agriculture but other areas of the community as well.	The Basin Analysis Report provides a summary of recommended implementation steps that includes recommendations for optimization and expansion of existing monitoring networks, as well as providing support to landowners in implementing best sustainable practices by soliciting information on and widely sharing best practices with regard to water use in vineyards, wineries, and other agricultural/commercial applications.
September 22, 2016	Susan Boswell (Verbal comment at WICC Workshop)	1.14	Ms. Boswell … wondered how winter cover crops in the valley might foster a better source of groundwater recharge and that there may be other things out there that we are doing that could provide better quantifiable data.	The Basin Analysis Report provides a summary of recommended implementation steps that include the evaluation of strategic recharge opportunities, particularly along the Napa Valley Subbasin margin and in consideration of hydrogeologic factors in the near-to mid-term, as well as ongoing efforts to improve scientific understanding of groundwater recharge and groundwater- surface water interactions.
September 22, 2016	Pamela Smithers (Verbal comment at WICC Workshop)	1.15	Ms. Smithers said that maintaining the current status of the river is not enough, noting that in the past the river flowed year-round in the area of St Helena and now it is often dry late in the year. Ms. Smithers suggested that our starting point should be at time when the river flowed.	Reaches of the Napa River have over many decades (since the 1930s) experienced low to no-flow conditions during the summer-to-fall period for a variety of reasons. Changes in stream flow over the years has been impacted by: • seasonal rainfall, • small dams (both legal and illegal) that have been constructed to block stream flow in the hills; • withdrawl of surface water (both legal and illegal) from the creeks, • elimination of valley floor wetlands and reduced infiltration areas from development as far back as the 1800's. The duration of annual no flow days varies from year-to-year and increases during extended droughts as during recent years. SGMA does not require return to pre-development conditions, nor would decreased groundwater pumping necessarily have a significant impact on these duration of no flow days. The Basin Analysis Report provides measurable objectives and minimum thresholds at 18 monitoring sites. Groundwater levels at 16 of these sites will be regularly evaluated and used to ensure that streamflow conditions are maintained or improved with respect to historical observations. Surface water and groundwater are connected; therefore, seasonal and year to year variability in precipitation and other factors have affected both surface water and groundwater. Since at least the 1930s, periods of no flow days have been observed in the Napa River system, particularly during drier years. Based on the analyses of surface water and groundwater interconnections, including the relationship of this connection to seasonal and annual groundwater elevation fluctuations, the Basin Analysis Report uses 16 wells (and other data including stream gage data) in the Subbasin to monitor groundwater level impact on the Napa River. As long as the fall water levels in these 16 wells remains above the determined level, (the "minimum threshold"), the contribution of groundwater to flow in the Napa River is determined to be no less than has occurred historically in the fall. On average, it is preferable for fall water levels in these wells to approximate their individual measureable objective, which is a level higher than the minimum threshold. While the County specifically monitors groundwater and surface water conditions and, through the Basin Analysis Report, sets threshold values for determining if/when groundwater levels are changing in ways that could exacerbate streamflow depletionin the Napa River, ultimately the duration of annual no flow days are impacted by a wide array of factors, and varies from year-to-year.

September 22, 2016	Pamela Smithers (Verbal comment at WICC Workshop)	1.16	Ms. Smithers had a question about the use of irrigation as an input in the water budget and also asked how recycled water is being calculated in the water budget.	The Root Zone Model is a component of the Subbasin water budget. Irrigation is an input/inflow to the root zone soil moisture. The Root Zone Model assumes that irrigation is only applied when needed to supplement precipitation to meet the crop demand (evapotranspiration, ET). However, from the perspective of the overall Subbasin water budget, irrigation is an output/outflow through ET. Recycled water use is reflected in the water budget based on the use of recycled water reported by the municipalities in the Subbasin and by the use of recycled water for irrigation as calculated by the Root Zone Model and is informed by the source of water supply assigned for irrigated land use units in the Department of Water Resources' land use surveys and by the delivery area for the Town of Yountville Recycled Water Distribution System.
September 22, 2016	Kimberly Richard (Verbal comment at WICC Workshop)	1.17	Kimberly Richard questioned how the root zone model and soil moisture is affected by deforestation and asked how important the trees are in maintaining the resulting groundwater recharge. Ms. Richard asked how important is it to reduce deforestation to maintain healthy soil moisture.	The Root Zone Model presented in the Basin Analysis Report treats each mapped land use type with its rooting depth and crop type individually, resulting in groundwater recharge and irrigation demand calculations for more than 16,000 land use units comprising the entire Napa Valley Subbasin. The model is reliant on the resolution of the available land use data. And does not account for individual trees. However, changes in vegetation/land use over the evaluated base period are captured in the Root Zone Model by interpolation of Department of Water Resources' land use maps between 1987 and 2011. The specific effects of deforestation on soil moisture were outside of scope of the Basin Analysis Report.
September 22, 2016	Pamela Smithers (Verbal comment at WICC Workshop)	1.18	Pamela Smithers suggested separating the presentation of the surface water component into surface water and recycled water to make it more clear to the public which supply is being used.	Recycled water use within the Subbasin is listed in Chapter 5 (5.2 Water Supplies and Utilization by Sector) of the Basin Analysis Report. Estimates for recycled water use for irrigation are presented with the Root Zone Model results in Chapter 6 (6.5.6 Root Zone Model Results).
September 22, 2016	Tosha Comendant (Verbal comment at WICC Workshop)	1.19	Tosha Comendant commented on the 1988-2015 base-period used for the analysis and asked if any sensitivity analysis was conducted to see if adjusting the period 5 years one way or the other influenced the results shown.	A base period of time must be selected so that it is a representative period of study for groundwater basin conditions, with minimal bias that might result from the selection of a wet or dry period or significant changes in other conditions including land use and water demands. The study period selected for the Basin Analysis Report spans from water years 1988 to 2015. This period was selected on the basis of the following criteria: long-term mean annual water supply; inclusion of both wet and dry stress periods, antecedent dry conditions, adequate data availability, and inclusion of current cultural conditions and water management conditions in the basin. A shift of the base period would not satisfy these criteria. A sensitivity analysis on the base period was not performed.
October 28, 2016	Gordon Evans Letter to WICC Board of Directions, Re: WICC Special Meeting 9/22/16	1.20	I'm concerned about the County's attempt to "fast track" an Alternative to the state-mandated requirements of SGMA (CA Sustainable Groundwater Management Act). …While these responses by the BOS (and WICC's symbolic nod to conducting a "Public Workshop") may technically comply with the State requirements for Public Input and the SGMA Alternative submission deadline, they are certainly not in keeping with the spirit of the State guidelines. They are little more than a transparent attempt to "kick the can down the road" and utilize the Alternative option as a "Hail Mary" to manipulate selected data and avoid the far more stringent requirements of a full-blown State-mandated Groundwater Management Plan and the formation of a Groundwater	See response to 1.9

			Management Agency within the County.	
October 28, 2016	Gordon Evans Letter to WICC Board of Directions, Re: WICC Special Meeting 9/22/16	1.21	Today's WICC Agenda statement that "… the Napa Valley Subbasin… has operated within its sustainable yield for a period of 10 years or more and is being managed consistent with the goals of SGMA and CA DWR regulations" is self-serving and misleading at best. The data provided in an elaborate and extremely complicated presentation by the County's Consulting Engineers, Luhdorff & Scalmanini, is narrowly focused on a small geographical area, utilizes figures from a very narrow time frame (2008-10) and does not take into account whatsoever any surface runoff or recharge factors from the surrounding areas.	The 9/22/16 presentation *Napa Valley Groundwater Sustainability: A Basin Analysis Report for the Napa Valley Subbasin (Draft)* focused on the geographic subject area of the Napa Valley Subbasin, and included surface water and groundwater data for the selected 28-year base period from 1988 to 2015. Runoff and recharge from the surrounding areas are incorporated in the Napa Valley Subbasin water budget.
October 28, 2016	Gordon Evans Letter to WICC Board of Directions, Re: WICC Special Meeting 9/22/16	1.22	In summary, Napa County cannot say that groundwater is stable and make a case for the AGSP because there are more than 10 years of data that show we have dry (or greatly diminished flow in) streams and river beds, salt water intrusion, water quality degradation, wells going dry, land subsidence (along the Napa River) and specie and habitat extirpation. SGMA defines these as "undesirable results," primarily due to increased groundwater pumping over time and not enough recharge. Recharge originates in the hills, where unabated clearcutting and rampant vineyard development continue. The San Francisco Regional Water Quality Control Board cited well water availability and the lack of flows in the Napa River in their Triennial Report last Fall. Ample evidence and documentation show that our groundwater is in depletion, and this will continue in the absence of diligent management and planning.	See responses to Comments 1.5, 1.7, 1.8, 1.9, and 1.10. The Triennial Report referenced in this comment, San Francisco Bay Basin Water Quality Control Plan 2015 Triennial Review Staff Report, December 2015[1], does not include an analysis or evaluation of groundwater conditions in the Napa Valley Subbasin or of lack of flow in the Napa River. While the report does not address the points claimed by Mr. Evans, the San Francisco Bay Basin Plan (dated March 20, 2015) does note that low flow conditions during the spring and dry season (along with stressful water temperatures and fish migration barriers) in the Napa River do "exert a significant negative influence" on juvenile steelhead (Section 7.8.4.1). However, that section does not refer to any data that are inconsistent with what is presented in the Basin Analysis Report, nor does the Basin Plan identify groundwater conditions as the cause of low flows in the River.

[1] (http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/docs/Triennial_Review/Appendix%20B%202015%20triennial%20review%20staff%20report%20-%2012-15.pdf, accessed November 1, 2016)

October 31, 2016	Chris Benz, Napa Group, Sierra Club, Email: Comments on Napa Valley Basin Analysis Report	1.23	We request that the report clarify the discrepancy between the calculated water budget (an annual increase of 5900 acre-feet/year as given on page 111) and the observed stability in groundwater levels. As this discrepancy calls into question the validity of the budget, it should be discussed in greater detail and, ideally, corrected, so that the calculated value for water storage reflects what is observed. From page 113: Data on groundwater levels in the Subbasin show stable trends during the base period. The average annual change in storage volume calculated by the water budget suggests an accrual of water within the subbasin that is not consistent with the stable spring to spring groundwater levels observed. The most likely explanations for this discrepancy are that inflows are overstated, outflows are understated, or some combination of the two.	The Subbasin water budget and the groundwater level change in storage analyses are two independent analyses that inform the sustainable yield estimate. Any effort to quantify Subbasin conditions is subject to some uncertainty. Uncertainties in the water budget and groundwater level changes in storage are addressed in the Basin Analysis Report (Sections 6.6 and 6.9). Over the base period from 1988 to 2015, the water budget estimates average annual total Subbasin inflows to be 235,400 acre-feet/year, and estimates average annual total Subbasin outflows to be 229,500 acre-feet/year. The difference between the estimated average annual inflows and outflows are 5,900 acre-feet/year (i.e., 2.5% of average annual inflows and 2.6% of average annual outflows). It is not necessary that the water budget be brought into exact agreement with observed groundwater level changes in order to move forward with management efforts; however, further clarifications will be made to the Basin Analysis Report to clarify sources of uncertainty. Chapter 10 of the Basin Analysis Report provides a summary of recommended implementation steps that includes recommendations for reducing uncertainties of water budget components and projected future water budgets. Further calibration of water budget components based on ongoing data collection will reduce uncertainties of previously estimated water budget components and projected future water budgets.
October 31, 2016	Chris Benz, Napa Group, Sierra Club, Email: Comments on Napa Valley Basin Analysis Report	1.24	We commend the recognition that the Napa River system is considered to be the most sensitive indicator of sustainable groundwater usage. From page 131: Since the river system is considered the most sensitive sustainability indicator in the Napa Valley Subbasin, the measurable objectives and minimum thresholds discussed below are recommended to ensure groundwater sustainability or improve groundwater conditions, and provide ongoing monitoring targets devised to address potential future effects on surface water. However, a river flow gauging site is not included as one of the “representative monitoring sites”. Is it possible to include a site that measures river flow and sets Minimum Thresholds and Measurable Objectives for this site?	The Basin Analysis Report provides measurable objectives and minimum thresholds at 18 monitoring sites. Groundwater levels at 16 of these sites will be regularly evaluated and used to ensure that streamflow conditions are maintained or improved with respect to historical observations. In addition, Chapter 10 of the Basin Analysis Report presents a summary of recommended implementation steps that includes the following recommendation “Coordinate with the Resource Conservation District and others regarding current stream gaging and supplemental needs for SGMA purposes; consideration of areas that may also benefit from nearby shallow nested groundwater monitoring wells (similar to LGA SW/GW facilities)”. This includes potential establishment of new streamflow gage sites. Surface water levels and surface water flow data will continue to be included as part of the County’s monitoring of surface water and groundwater interactions in the future. However, establishing a stream gage as a representative monitoring site would likely limit the ability of the County to effectively evaluate Subbasin conditions when in dry water years, such as during the recent drought, there is no surface water to monitor during parts of the year at some monitoring sites. Establishing representative monitoring sites at wells will allow the County to more comprehensively track Subbasin conditions, even at times when streams are dry.

October 31, 2016	Chris Benz, Napa Group, Sierra Club, Email: Comments on Napa Valley Basin Analysis Report	1.25	In addition to managing the Napa Valley Subbasin, we encourage the County to expand monitoring of wells to hillside locations (making use of volunteered wells) to further define Napa County's groundwater situation and provide data for use in creating sound groundwater policies for the entire County.	See response to 1.11