Update on Draft 2018 SGMA Basin Prioritization

What it Means for Napa County

On May 18, 2018, DWR released a draft 2018 Basin Prioritization of groundwater basins as required by the Sustainable Groundwater Management Act (SGMA). In accordance with SGMA, Napa County's Groundwater Sustainability Program is fully in compliance with SGMA requirements. After an initial review of the draft Basin Prioritization, the following are some important takeaways:

- DWR noted that the groundwater levels for the Napa Valley Subbasin are stable
- No changes are required to the County's SGMA efforts for the Napa Valley Subbasin as a result of a proposed change in priority, as high/medium basins both have the same requirements which are fulfilled by the Napa Valley Groundwater Sustainability, A Basin Analysis Report for the Napa Valley Subbasin (i.e.- BAR) submitted to DWR in December 2016 and the Napa County Groundwater Sustainability Annual Report-Water Year 2017 submitted to DWR in March 2018
- The Napa Valley Subbasin BAR is still under review by DWR at this time

Additional information on DWR's draft 2018 Basin Prioritization process is provided below, followed by a summary of the proposed changes, current actions, and next steps.

Background

The Department of Water Resources (DWR) groundwater basin prioritization classifies California's 517 basins and subbasins into priorities based on components identified in the California Water Code. The priority of basins and subbasins then determines whether California Statewide Groundwater Elevation Monitoring (CASGEM) and Sustainable Groundwater Management Act (SGMA) provisions apply in any given basin.

In 2014, DWR prioritized groundwater basins through its CASGEM Program, which classified basins as high, medium, low, or very low based on the consideration of factors in legislation enacted in California's 2009 Comprehensive Water package. Some of these factors include population, population growth, number of wells, irrigated acreage in the basin (including irrigation using various water sources), and reliance on groundwater as a source of supply.

Following adoption of SGMA and Basin Boundary Modification regulations, in January 2015 DWR adopted the 2014 CASGEM Basin Prioritization as the initial prioritization under SGMA. Under this initial prioritization, the Napa Valley Subbasin was categorized as a medium priority and subject to SGMA; all other basins and subbasins in Napa County were a very low priority and not subject to SGMA. In the fall of 2016, DWR completed the final groundwater basin boundaries, which incorporated numerous statewide jurisdictional and scientific modifications, as well as addressing requested boundary modifications. DWR published Bulletin 118 – Interim Update 2016 on December 22, 2016.

SGMA requires a reassessment of the prioritization anytime DWR updates Bulletin 118 basin boundaries. As a result, following the release of the 2016 Basin Boundary Modifications, DWR began the 2018 SGMA prioritization of California's 517 groundwater basins.

DWR Draft Basin Prioritization

On May 18, 2018, DWR released a draft updated prioritization of groundwater basins as required by SGMA. The newly released draft prioritization identifies 109 basins as high- and medium-priority, which

includes 14 basins newly ranked as high- or medium-priority, and 38 basins previously ranked as high or medium-priority are now ranked as low or very-low priority. Under the Groundwater Sustainability Plan Regulations, low- or very low-priority basins are not subject to SGMA.

DWR will hold a public webinar May 30 to present the draft results, followed by statewide public meetings at the end of June. DWR will be taking public comments on the draft results, including additional data or information that is consistent with statewide datasets identified in the Basin Prioritization Process and Results Document. The 2018 SGMA Basin Prioritization is scheduled to be finalized by fall 2018 after a 60-day public comment period that runs through July 18, 2018.

When the 2018 SGMA Basin Prioritization is finalized, basins newly subject to SGMA must form Groundwater Sustainability Agencies (GSAs) within two years and develop Groundwater Sustainability Plans (GSPs) within five years, or submit an Alternative Plan (GSP equivalent) within two years.

For more information or to submit a comment, see DWR's website: https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization

Napa County Basins

After an initial review of the draft DWR 2018 Basin Prioritization, the following summarizes the proposed changes, current actions, and next steps.

Napa Valley Subbasin

- Proposed move from medium to high priority (from 20.8 priority points in 2014 to 24 priority points in the 2018 draft prioritization) Med=15-21 High= >21
- Based on changes to priority ranking/criteria, new and/or updated data/sources of information, and consideration of updated SGMA provisions (includes local habitat and streamflows)
- DWR indicated a potential issue with salt water intrusion, but this appears to be based on older reference material (i.e., a 1995 USGS report which relies on a 1975 DWR report; more up-to-date information is not cited by DWR as part of the draft prioritization)
- DWR also noted that the groundwater levels are stable
- DWR's prioritization process assigns one "impact point" to a basin that has vegetation, wetlands, and spring habitats in the basin; similarly, an impact point is assigned to a basin that has a perennial or permanent stream in or adjacent to the basin. For these reasons, this Subbasin received two impact points; however, it received "0" priority points due to lack of potential for adverse impact to habitat and streamflow (because DWR reports "No Declining GW Levels")
- Staff and our groundwater consultant LSCE are reviewing the proposed draft, meeting with DWR, and preparing a comment letter
- No changes are required to the County's SGMA efforts at this time, as high/medium basins both have the same requirements which are fulfilled by the Napa Valley Groundwater Sustainability, A Basin Analysis Report for the Napa Valley Subbasin (i.e., the BAR) submitted to DWR in December 2016 and also the Napa County Groundwater Sustainability Annual Report - Water Year 2017 submitted to DWR in March 2018
- DWR has not completed review of the Napa Valley Subbasin BAR

Napa-Sonoma Lowlands Subbasin

- Moved from very low to medium priority (in 2014 this subbasin received a "0" score, although it had 9 priority points. In the 2018 draft prioritization, it received 15 priority points) Low=8-14 Med=15-21
- Based on changes to priority ranking/criteria, new and/or updated data/sources of information, consideration of updated SGMA provisions (includes local habitat and streamflows)
- DWR indicated a potential issue with salt water intrusion, but this appears to be based on older reference material (i.e., a 1995 USGS report which relies on a 1975 DWR report; more up-to-date information is not cited by DWR as part of the draft prioritization)
- DWR's prioritization process assigns one "impact point" to a basin that has vegetation, wetlands, and spring habitats in the basin; similarly, an impact point is assigned to a basin that has a perennial or permanent stream in or adjacent to the basin. This Subbasin received two impact points for these reasons; however, it received "0" priority points due to lack of potential for adverse impact to habitat and streamflow (because DWR reports "No Declining GW Levels")
- Staff and our groundwater consultant LSCE are reviewing the proposed draft, meeting with DWR, and preparing a comment letter
- If the 2018 Basin Prioritization is revised to a low priority based upon information/data provided to DWR, then nothing additional is required for SGMA, but expanded monitoring under the Groundwater Sustainability Program would be desired
- If the Subbasin is designated as a medium priority, then SGMA would require a Basin Analysis Report or that a GSA be formed and a GSP prepared. If a GSA is formed, participants may include Napa County, Solano County, City of Napa, American Canyon, Vallejo, water agencies/districts and others (see attached Napa Sonoma Lowlands map).

Berryessa Valley Basin and Pope Valley Basin

• There were no proposed changes for these two basins; both remain designated as Very Low Priority by DWR.

Summary/Next Steps

- DWR's draft 2018 Basin Prioritization public meetings: May 30th (webcast) and June 25-27, 2018
- Staff and LSCE complete review of the proposed draft and meet with DWR to review/discuss
- Staff and LSCE complete comment letter to DWR re: proposed Basin Prioritization changes
- DWR Public Comment period closes: July 18, 2018
- Respond to any DWR questions/comments or requests for additional information
- DWR to finalize Basin Prioritizations by mid October 2018 (date pending)
- Provide update to the Board of Supervisors re: status/next steps (late 2018)



Napa-Sonoma Lowlands Subbasin Location Reference

FIGURE A