November 19, 2021

LETTER OF TRANSMITTAL

Dear Directors of the Napa County Groundwater Sustainability Agency:

The Chair and Vice Chair of the Napa County Groundwater Sustainability Plan Advisory Committee ("GSPAC") are pleased to transmit the Napa Valley Subbasin Groundwater Sustainability Plan ("GSP") as recommended by the GSPAC. Consistent with section VIII of its bylaws, the GSPAC approved the transmitted Recommended GSP by (more than) a two-thirds vote of its members actually present at its Special Meeting on November 16, 2021.

The recommended GSP, while not endorsed unanimously, has broad-based support. It is the product of robust deliberation in which all GSPAC members, and the general public, expressed their views. In transmitting the Recommended GSP, the Chair and Vice Chair are speaking for ourselves, yet in the belief that our views are widely shared by GSPAC members. As such, we offer the following for your consideration which we strongly support:

Timely implementation of the GSP is critical. In particular, the GSPAC unanimously adopted a recommendation that the Napa County Groundwater Sustainability Agency ("NCGSA") at the earliest practical time appoint a Technical Work Group ("TWG") with responsibility to advise the NCGSA on matters relating to GSP implementation, including addressing data gaps and strong and timely adaptive management. See Recommended GSP, Section 11.8.2.

Specifically, we believe that the charge to the TWG should include the following:

1. Conduct a focused review of the distribution of GSP monitoring facilities and networks for the purposes of assessing interconnected surface waters and further defining data gaps related to the effects of groundwater extractions on interconnected surface waters. A work plan should be developed to identify approaches for improved characterization, measurement, and monitoring of (a) interconnected surface water depletions due to groundwater extractions and (b) reductions of groundwater levels near groundwater dependent ecosystems (GDEs).
2. Evaluate the uncertainty inherent in available datasets central to the management of the Subbasin, with recommendations to address data gaps and narrow areas of uncertainty, including through improved estimation or quantification of groundwater use.
3. As new models and data become available, review and update climate change projections as part of the GSP water budget analysis and evaluation of future undesirable results.

4. Evaluate and consider data being developed in the ongoing Joint City and County Reservoir Watershed Study.

5. Pursue projects with landowners and resources agencies to plan and design multi-benefit Managed Aquifer Recharge projects (see Recommended GSP, Section 11.4.1 (GSP Project # 1).

6. Develop recommendations for improving the timing and delivery of updates to interested parties related to groundwater and surface water conditions. This could be done by taking advantage of existing tools, such as the NCGSA's Interactive Hydrologic Conditions Map (at this link; available on the GSA website), the Interactive Groundwater Hydrographs (at this link), available through the Hydrologic Conditions Map, the County/Napa RCD groundwater-surface water story map (at this link; available on the NCGSA website), and the County/Napa RCD Stream Watch website (at this link).

Strong adaptive management was a critical concept for the GSPAC in the implementation of the GSP by the TWG.

This was extensively discussed during our committee's work, as reflected in our meeting minutes. We stress that an important early order of business for the TWG should be the development of an effective Adaptive Management Protocol to guide GSP implementation, including ongoing evaluation of groundwater conditions, potential changes to those conditions, and providing timely recommendations for steps and actions needed to ensure the Napa Valley Subbasin achieves the GSP sustainability goal.

Successful Plan implementation relies upon a suite of metrics to detect possible deterioration of groundwater conditions. Should those be observed, the GSA will be called upon by SGMA regulations to implement Projects and Management Actions (PMAs) well before undesirable results are reached.

In conclusion, and again speaking for ourselves but also in the belief that our colleagues are of the same view, we appreciate the opportunity to have been of service to the NCGSA and advance actions in support of long-term groundwater sustainability.

Respectfully submitted,

David Graves, GSPAC Chair

Alan Galbraith, GSPAC Vice-Chair