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From: David Graves <wavey1500@icloud.com>

Sent: Wednesday, March 13, 2024 11:49 AM

To: Vicki Kretsinger <vkretsinger@lsce.com>; christian@stillwatersci.com

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Subject: CEFF and the Napa Sub-basin

[External Email - Use Caution]

Good morning Vicki and Christian:

I have gone through all the comments on the Workplans, and the replies, in preparation for the TAG meeting on Thursday—an enlightening experience! And I cannot seem to find Mr. Fillipeli's email address, so I hope this message can be shared with him in advance of the meeting.

I have expressed my puzzlement on this issue several times, and I still do not understand how the nexus of CEFF and GSP's is imagined to function. For many GSA's, CEFF would appear to be a non-issue in that connectivity between surface water and groundwater is the least of the problems facing many of the SJV GSA's, for example. It appears to me that CEFF in its current iteration is being oversold as a management tool in that so far as I can tell, its "Step C" has not been applied to address the zero-sum problem of where water would come from to establish "environmental flows" where such flows are judged to be insufficient under the prevailing management regime.

In our system, as I have tried to understand the CEFF model, groundwater pumping in the summer at or below the sustainable yield value still precludes establishing dry-season base flows that would meet CEFF standards—or am I misunderstanding what I am reading about flows versus pumping?

I think it behooves those who wish to incorporate CEFF standards into GSP's to be very clear in explaining the implications of the CEFF values on managing aquifers. Without a means of shifting pumping seasonally, or storing a significant portion of the groundwater demand both intra- and inter-annually, it is not clear to me how a "Winter Storm" system with little surface storage like ours can meet CEFF standards while removing 13,500 afy from the aquifer.

Finally, I was interested to read in the comments that Rick Roger's of NOAA made reference to Faye's 1973 paper, and that Graham Fogg seems to believe that the Napa River was perennial under all winter precipitation regimes before irrigated agriculture that used groundwater was introduced.

In closing, I can summarize my comments above with the observation that there are many implicit assumptions that were introduced by the incorporation of CEFF framework into the ISW/GDE workplan. There is a lot of what I will call hand-waving in the promise of the CEFF approach and no examples I can find of its successful application in getting through a "Step C". I think both CEFF itself and the interests of all stakeholders would be better served if that were acknowledged.

I look forward to a robust discussion soon.

Sincerely,

David Graves

Sent from my iPhone