

Attachment B: Comments and Responses on Administrative Draft Napa County Water Conservation Workplan (October 30, 202)

March 4, 2024

Commenter Organization (if applicable)	Commenter Name	Section or Chapter Number	Page Number	Line Number	Table Number	Figure Number	Comment	Response
Napa RCD	Miguel García	ES-3	ES3	229			Testig irrigation systems to evaluate how evenly water is distributed to fields helps identify "areas where the system is performing poorly, which can help prevent over or under-irrigation.	Edit made.
Napa RCD	Miguel García	3.1.1	16	730			Measuring water use can also help users determine if they are using more or less water than they would expect based on the specs of their irrigation system. This can help identify the presence of leaks that might otherwise go unnoticed.	Added a sentence to the end of the second paragraph.
Napa RCD	Miguel García	3.3.1	21	909			The functional life expectancy of the emitters most widely used in Napa (Netafim pressure compensating emitters) is about 15 yrs, according to the manufacturer. Most vineyards have a lifespan greater than 15 yrs. Ideally, emitters should be replaced close to the 15 yr mark even if they are not malfunctioning. In reality, most vineyards keep the same emitters for the entire life of the vineyard. This negatively impacts the irrigation system's distribution uniformity in the last few years of the vineyard's life.	The Workplan explains that drip systems can degrade over time and require replacement in order to maintain efficient irrigation and control. Added clarification that 15 years is standard. "Most emitters have a life span of about 15 years, but vineyards have a substantially longer economic life. Ideally, emitters should be replaced close to the 15-year mark even if they are not malfunctioning. In practice most vineyards keep the same emitters for the entire life of the vineyard. This negatively impacts irrigation system DU in the last few years of vineyard life."
Napa RCD	Miguel García	3.4.2	29	1154			Some vineyards are now using biofilters https://wineindustryadvisor.com/2023/01/09/biofiltro-reimagines-winery-process-water-to-enhance-vineyards	Added a sentence to this section introducing this method, and a reference to this link.
Napa RCD	Miguel García	4.1.3	34	1303			CDFA increased the Healthy Soils Program maximum project amount this year to \$200,000	The link referenced in the Workplan shows that the maximum for 2024 is \$100,000, which seems to conflict. A sentence was added to clarify that maximum award amounts may change.
Napa RCD	Miguel García	4.1.3	35	1317			NRCS also pays for soil moisture probes	The Workplan includes examples of conservation practices that could be supported by NRCS, it is not intended to be a comprehensive list.
Napa RCD	Miguel García	5.2.1	40	1433			There is a typo in this sentence.	Edited the typo "the by" to "by the".
TAG	Julie Chambon	General					Useful document summarizing water conservation practice. As this document applies to all users, some of the language and/or examples can be made more general (instead of focusing on vineyard) - some details provided below	This comment is acknowledged.
TAG	Julie Chambon		ii				ERA should be in the footer (not Stillwater)	Edited.
TAG	Julie Chambon	Executive Sum	ES-2	197			Implementation plan "by the NCGSA" - add text in "" to clarify	Text added.
TAG	Julie Chambon	ES-3	ES-3				Landscaping conversion and/or turf removal is missing	Added other water conservation. "Other Urban Water Conservation Opportunities. Other water conservation opportunities for urban (M&I) water users include planting drought-tolerant or native landscaping for residential and commercial buildings, additional outreach and education efforts to landscape design professionals, use of reclaimed water for outdoor irrigation, use of mulches to reduce outdoor irrigation demand, and general improvements in outdoor irrigation scheduling and management. "
TAG	Julie Chambon	ES-3	ES-4		ES-2		clarify that the costs are costs to the user for implementation (does not account for costs to NCGSA/others - for example for development of benchmarking program or for expansion of recycled water infrastructures)	Added clarifying text to the sentence before table.
TAG	Julie Chambon	ES-3	ES-4		ES-2		this table may be the only item that users review, and costs can be confusing. Need to clarify upfront cost (per user, per acre?), and annual costs. Also it would be useful to clarify the potential water savings (% of water used without implementation of the practice)	The column headings specify which are upfront and which are annual costs, % water savings, and units defined below. The table was edited so that each column header indicates where to see the units and how % water savings is measured.
TAG	Julie Chambon	ES-4	ES-6	294			Cash-for-Grass programs listed here but missing from Table ES-2	Cash-for-Grass (or similar incentive programs for replacing landscaping) has been noted as a separate program within the GPR text. No information for scaling opportunity and savings potential was readily available and thus it has not been added as a separate row in the table. Quantifying savings potential would require mapping existing residential outdoor landscaping and estimating the change in ET with drought-tolerant alternatives. This will be considered as part of GPR implementation to achieve residential water savings. This has been included under "other urban water conservation opportunities" and listed in the table.
TAG	Julie Chambon	ES-5	ES-6	302			Section 1.5 does not exist	Changed to ES-6.

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TAG	Julie Chambon	1	2	402			add "and lays out an implementation plan for NCGSA to achieve groundwater pumping reduction	Added requested text to the end of the paragraph.
TAG	Julie Chambon	2.1	9			2-3	Legend seems incorrect	Legend updated.
TAG	Julie Chambon	2.3	10	572			change "would" to "may"	Suggested edit made.
TAG	Julie Chambon	3.1	15	683			Indicate that the last two methods listed do not allow for differentiation of GW use vs. other water sources	At the end of this bullet point, added the sentence "However, ET measurement may not allow for differentiation between groundwater use and other water sources without additional monitoring."
TAG	Julie Chambon	3.1	15	689			word missing after or?	Corrected
TAG	Julie Chambon	3.1.1	16	730			add a clear statement that metering is the only technology that provides accurate quantification of groundwater use and that it is encouraged to be used for all users (and can be coupled with the other methods described below but the methods below cannot replace the information provided by metering)	The Workplan states that metering offers a high degree of accuracy, and that it is the measurement method that allows for quantification of water applied directly from groundwater, and not several different sources. The Workplan does encourage metering for all groundwater users as it is listed as a best management practice.
TAG	Julie Chambon	3.2.3	20				this section is under Water Conservation for All Water Users but it only addresses agricultural water users - need to update text in second paragraph to refer to all users and in third paragraph indicate that a pilot program may be initiated for agricultural users before being expanded to all users	In the second paragraph, added the sentence "Benchmarking could benefit all types of water users, especially agricultural water users as they use the majority of water in NCGSA."
TAG	Julie Chambon	3.3.5	27			3-8	add a note to the table to indicate that the cost is for optimized canopy management cost (in addition to typical costs)	Changed "canopy management" to "improved canopy management" and the heading "O&M Costs" to "Additional O&M Costs." It is also explained in the text prior to this table what costs are for canopy management in general compared to the improved canopy management identified here.
TAG	Julie Chambon	3.5.3	32	1224-1229			this paragraph seems to belong to Section 3.5.1	Water-efficient appliances applies to both sections. A sentence was added that refers also to Section 3.5.1.
TAG	Julie Chambon	5.2	39			5-2	suggest adding columns for Third-Party Audit requirements and re-certification frequency	Added table description: "Programs vary by the third-party audit process and the requirements to become and remain certified." In each of the subsequent subsections there are links to each of the programs that have more information (or where the reader can go to request more information), including third-party audit requirements and re-certification frequency.
TAG	Julie Chambon	5.2.1	40	1437-1438			Numbers are different than in Table 5-2	Table 5-2 numbers are for the state, numbers in the referenced text are for Napa County. Added text to the table to clarify that those are state numbers. The other text is clear that it is referring to Napa County.
TAG	Julie Chambon	5.2.6	45	1578			refer to Section 6 (instead of 7)	Edit made.
TAG	Julie Chambon	7					A roadmap/detailed schedule for implementation would be very useful in this section and would help the NCGSA track progress vs. the implementation plan.	The implementation plan is included in the companion document, the Groundwater Pumping Reduction Workplan
TAG	Julie Chambon	7					The process for implementation is not very detailed in this section. For example for development of the Benchmarking program - what are the steps? Secure funding; procure services for implementation; prepare a work plan; implementation; etc...?	The implementation plan is included in the companion document, the Groundwater Pumping Reduction Workplan
TAG	Albert Filipelli		11				insert map showing planted acres within the basin v. within the county	This comment is acknowledged. Added clarification that: "The Napa Valley Subbasin covers a portion of Napa County and does not include all irrigated acreage."
TAG	Albert Filipelli	3.3.2	23	970			neutron probe not widely used anymore	The neutron probe is used as an example of technology that has been used in the region by growers. A clarification has been added that this technology is not commonly used.
TAG	Albert Filipelli	3.3.4	25				annual cover cropping and tillage v. perennial cover cropping no till	Sentence is added explaining this at the end of the second paragraph.
TAG	Albert Filipelli	3.3.6	27				detail on specifics on favorable v. unfavorable row directions. Can training or trellis infrastructure be used to overcome unfavorable row direction // or retrofit possibilities	This section has been edited. "An individual would work with an experienced vineyard manager to develop site-specific details including specifics on favorable row directions, whether training or trellis infrastructure be used to overcome unfavorable row direction, or other retrofit possibilities"

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TAG	Albert Filipelli	3.3.7	27				A table of commercially available rootstocks and their drought tolerance would be helpful	The intent of this section is to introduce rootstock selection as a potential long-run water conservation consideration. A survey of commercially available rootstocks for achieving water conservation was not conducted. The workplan lists resources that the reader can use to explore further. A sentence was added "An individual operation would work with an experienced vineyard manager to appropriate rootstocks that are commercially viable and suitable based on field-specific conditions. "
TAG	Albert Filipelli	5.2					what criteria specific to water use and accounting for water use does each program contain	The intent of this section is to provide the reader information about which programs apply to vineyards, wineries, or both. There are links to each of the programs which have more information. A sentence was added: "The following subsections provide a more detailed summary of each program and links for additional information for each of the certification programs.. "
Winegrowers of Napa County	Michelle Benvenuto	Title Page					The water use of rural residential landscape is 4 times greater than all winery water use, yet wineries are specifically called out whereas rural residential landscape irrigation is part of "Other Water Users". (See GPR Workplan – lines 655-657 for confirmation that 90% of residential groundwater use, i.e. an average of 2,907 AFY for 2015-22, is used for landscape irrigation, compared to winery total average water use at 790 AFY.)	This comment is acknowledged.
Winegrowers of Napa County	Michelle Benvenuto	Executive Summary	ES-1	151-159			Suggest emphasizing that we are facing increased extreme weather conditions. Hence, we should not only be highlighting drought years, but also that the 2022-23 water year was the wettest on record in California. Climate change is widely acknowledged to result in more rain in certain years, posing challenges related to stormwater yet offering opportunities for groundwater recharge.	The introductory paragraph has been edited to emphasize that there are more extreme rainfall events in addition to more droughts.
Winegrowers of Napa County	Michelle Benvenuto	ES	ES-1	160			if we are to establish a connection between climate resilience and water conservation, an additional action should address the significance of utilizing off-site mitigation. This would allow projects to purchase or protect areas, addressing the crucial need for ecological connectivity. Simultaneously, it's imperative to ensure the protection of the integrity of agricultural zoning. See https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Expanding-Nature-Based-Solutions/CNRA-Report-2022---Final_Accessible.pdf	This Workplan is focused on how water users within the NCGSA can implement water conservation measures at their homes and/or businesses to reduce demand for groundwater. While off-site mitigation would contribute to groundwater sustainability and offer other environmental benefits, it is beyond the scope of this Workplan.
Winegrowers of Napa County	Michelle Benvenuto	ES-4.2	ES-5	288-296			These programs are for customers of the listed municipalities. Are there programs available to rural residential groundwater users?	In general, programs run by municipalities are only going to be available to water users within (or at least near to) the city limits of that municipality or its service area. County-wide programs and resources are often available to rural groundwater users outside of municipalities. This has been clarified in the text.
Winegrowers of Napa County	Michelle Benvenuto	ES-5	ES-6	308-309			How does the cost of implementing the GSP decrease for water users who meter or measure water use and can share that data with the GSA? Understanding this relationship is crucial for assessing the advantages of data-sharing practices.	Additional data helps fill GSP data gaps, thereby saving costs by reducing GSA staff and consultant time and effort developing such information.
Winegrowers of Napa County	Michelle Benvenuto	4.2	36	1332-1346			These residential programs are for city water customers. These would not be available to the rural residential groundwater users in the Subbasin.	This section is specifically focused on water users within municipalities.
Winegrowers of Napa County	Michelle Benvenuto	3.3.6	27				Napa County must ensure that its Track 2 approval process unequivocally allows for redesign opportunities, encompassing new spacing and orientation of vine rows. This assurance is vital for fostering innovation, climate change adaptability, and water conservation.	This comment has been noted.
Napa Valley Vintners	Michelle Novi	General					The Napa County Water Conservation Workplan (WC) is a comprehensive informational resource that provides resource users, interested stakeholders, and policymakers with a guide for understanding both the historical and the current use of groundwater, along with the associated values and costs of the potential strategies for water conservation within the Napa Valley Subbasin.	This comment is acknowledged.
Napa Valley Vintners	Michelle Novi	ES-6.2	12				The Napa Valley Vintners (NVV) should be listed under section ES-6.2 as a local organization providing valuable resources for Napa stakeholders to learn about water conservation.	Added NVV to this paragraph.

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Napa Valley Vintners	Michelle Novi	General					The NVV's commitment to its members implementing sustainable practices in agriculture is directly aligned with the Workplan's emphasis on adopting best management and innovative water conservation approaches. Scaling up the implementation of these voluntary strategies is crucial for securing the long-term viability of our world-class wine region.	This comment is acknowledged and NVV's commitment is appreciated
Napa Valley Vintners	Michelle Novi	General					The NVV is committed to sharing conservation information & resources with its 550 winery members so that the use of groundwater is reduced.	This comment is acknowledged and NVV's commitment is appreciated
Napa Valley Vintners	Michelle Novi	General					The Napa County Resource Conservation District (RCD) is a critical partner in Napa County's water conservation efforts. They provide a number of technical services to the local vintner and grower community, including performing distribution uniformity assessments on irrigation systems. Despite current underwriting available for this particular service, expanded public funding is needed to ensure that the RCD's technical guidance remains readily available in the community.	This comment is noted. The Workplan describes potential funding opportunities for water conservation efforts but does not establish new funding mechanisms. Pursuing grant opportunities or other joint funding opportunities with RCD and similar organizations may be considered to accomplish GPR implementation.
Napa Valley Vintners	Michelle Novi	General					In the Napa Valley, voluntary sustainability certification programs for vineyards and wineries have grown locally out of a commitment to environmental stewardship and a recognition that progressive programs and rigorous requirements can avert the need for future regulatory interventions. Specifically, the Napa Green non-profit certification program has provided vintners and growers with specialized conservation expertise and a robust, whole-systems approach to resource efficiency and climate action. Much like the RCD, Napa Green's vital services are supported by the availability of grant funding. To best advance local water conservation efforts, consistent funding for local non-profits focused on resource conservation should be established within Napa County's annual budget.	This comment is noted. The Workplan describes potential funding opportunities for water conservation efforts but does not establish new funding mechanisms. Pursuing grant opportunities or other joint funding opportunities with Napa Green and similar certification organizations may be considered to accomplish GPR implementation.
Napa Valley Vintners	Michelle Novi	General					There are natural tie-ins between the GSP Action Plan and the General Winery Waste Discharge Requirement (Winery WDR or General Order). Napa County is uniquely situated in that County entities are or will be serving as the oversight agency for the implementation and monitoring of both of these programs in Napa. While the oversight agencies are different, there is an opportunity to see where the same or similar goal(s) can be accomplished for both sets of regulations. Groundwater monitoring wells are one example of such an opportunity. The Winery WDR requires dischargers in the upper tiers (and potentially lower tiers if there is an effluent or discharge issue) to install monitoring wells and perform groundwater monitoring as part of the monitoring and reporting program. The General Order does allow regional groundwater monitoring to be done in lieu of individual site groundwater monitoring though and would be an opportunity for overlap between the two regulations. Groundwater monitoring wells could be installed in such a way that they would provide the necessary monitoring information for both Winery WDR compliance and monitoring for the Napa GSP. This is just one of many ways to investigate where there are opportunities for better efficiency for regulatory monitoring and compliance for both the County and stakeholders through the GSP Action Plan.	This comment is noted. Finding ways for county programs to work together as much as possible will support Workplan implementation, and potentially lower implementation costs. Workplan implementation (see also GPR) will investigate opportunities for better efficiency for regulatory monitoring and compliance.
UCCE Napa	Qicheng Tang	ES	ES-1	151-152			What does it mean by saying "drought"?	Drought typically refers to a period covering three or more consecutive dry years.

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UCCE Napa	Qicheng Tang	ES	ES-2	190			Why setting 10 percent as the reduction goal?	The prior section of the Workplan provides additional background. Namely, "The GSP specified Management Action #1 to encourage water users to continue to implement water conservation practices and provide flexibility as to how, and to some degree, when the conservation is achieved. On October 14, 2021, the GSP Advisory Committee (GSPAC) approved the Measurable Objective for depletions of interconnected surface water, which includes a 10 percent reduction from average annual historical (2005-2014) pumping (LSCE, 2022). This Water Conservation Workplan outlines water conservation practices that could be implemented to reduce groundwater pumping and achieve the sustainability goal." Section 1 of the companion document GPR Workplan describes additional details. See also Master Response #3.
UCCE Napa	Qicheng Tang	ES-1	ES-2	205			Better be explicit that this is a modeling result.	Historical pumping is from the GSP. A citation has been added.
UCCE Napa	Qicheng Tang	1	1	403-413			Suggest re-writing this paragraph. For example, put the pumping reduction sentence after the first sentence would make it flow better.	Moved that sentence (and the following sentence, which goes with it) to the second sentence of the paragraph.
UCCE Napa	Qicheng Tang	2	7			2-2	Would it be good to also provide overall water budget for NV?	This Workplan is focused on water conservation practices and showing current groundwater demand is the relevant metric in this context. All of the values shown in the Workplan are for the Napa Valley Subbasin portion of Napa County only.
UCCE Napa	Qicheng Tang	2	9			2-3	This figure looks confusing. It seems that there are two sets of legends here.	Legend updated.
UCCE Napa	Qicheng Tang			714-716			Can mention that they address ET at different scales.	A sentence has been added to clarify.
UCCE Napa	Qicheng Tang			738-742			Hydrologists usually use tracers to solve the water-source problems.	This section is about remote sensing, which cannot (by itself) distinguish between sources of water. This is stated in the Workplan.
UCCE Napa	Qicheng Tang	3.2.2	19				My understanding is that the recycled water (specifically referred to NapaSan) has a somewhat limited spatial coverage. Only the West and East part of Napa has pipes installed.	The Workplan has identified recycled water as a source of in-lieu recharge; however, specific locations and amounts have not yet been identified and would be limited by the existing service locations (until/if new infrastructure is built). These will be identified in the implementation phase of the Workplan. Evaluating recycled water is also a separate project identified in the GSP.
UCCE Napa	Qicheng Tang	3.2.2	24			3-5	Just from a technical perspective - for mesoscale soil moisture, cosmic ray neutron sensors are often used (TDR sensors at field scales; RS at larger scales)	This comment has been noted.
Hundred Acre Wine Group, Inc.	Scott Slater	General					Letter	<p>This letter is acknowledged.</p> <p>As described in Section 1 of the WC, the WC Workplan is one of the PMAs defined in the GSP to provide a resource for water users for reducing groundwater pumping across the Subbasin. The Napa Valley Subbasin GSP includes Projects and Management Actions for achieving the sustainability goal as required by GSP Regulations. Following adoption of the GSP, initial GSP implementation for Management Action #1: Vineyard and Winery Water Conservation (WC) has involved development of the WC Workplan as specified in the GSP. Based on public input, the WC Workplan was expanded to include all water users in addition to vineyards and wineries. The GSP Regulations also require a description of the measurable objective that will benefit from the Projects and/or Management Actions. For Management Action #1 WC, the GSP specifically describes the measurable objective for the sustainability indicator for depletions of interconnected surface water. The WC (and its companion document the GPR) focuses on voluntary, incentive-driven water conservation practices that can be implemented by potentially all water users in the Subbasin to achieve groundwater sustainability benefits.</p> <p>See also Master Response #3.</p>
GSM	Gary Margadant	General					Letter	This letter is acknowledged. The comments in this letter are specific to the Napa County Groundwater Sustainability Annual Report, the Napa County Groundwater Monitoring Report, the ISW and GDE Workplan, and the Napa County General Plan. There were no WC Workplan-specific comments identified and no edits have been made.

