

CASSANDRA JAMES

District 1, (707) 553-5363

MONICA BROWN

District 2, Vice-Chair, (707) 784-3031

WANDA WILLIAMS

District 3, Pro-Tem, (707) 784-6136

JOHN M. VASQUEZ

District 4, (707) 784-6129

MITCH MASHBURN

District 5, Chair, (707) 784-6030

BOARD OF SUPERVISORS**SOLANO
COUNTY****BILL EMLÉN**

County Administrator

(707) 784-6100

675 Texas Street, Suite 6500

Fairfield, CA 94533-6342

Fax (707) 784-6665

www.solanocounty.com

January 10, 2025

State Water Resources Control Board
Division of Water Rights
Attn: Bay-Delta & Hearings Branch
P.O. Box 100
Sacramento, CA 95814

Via Email: SacDeltaComments@waterboards.ca.gov**Subject: Comment on the Draft Sacramento/Delta Update to the Bay-Delta Plan**

Dear Members of the State Water Resources Control Board,

On behalf of the County of Solano Board of Supervisors, we submit the below comments on the **Draft Sacramento/Delta Update to the Bay-Delta Plan**. While we appreciate the Board's commitment to protecting the Bay-Delta ecosystem and addressing critical environmental goals, we are deeply concerned about the potential economic, housing development, environmental, and groundwater sustainability impacts that could result from the proposed 55% unimpaired flow objectives and water quality standards. Solano County, its agricultural stakeholders and local food systems are at risk of severe consequences due to reduced surface water availability and the subsequent impacts on groundwater resources.

We also concur with the concerns raised in the Napa-Solano Regional Comment Letter submitted jointly by regional stakeholders, which outlines potential conflicts with critical regional water projects and underscores the need for a more balanced approach.

To better balance ecological goals with the needs of affected communities, we urge the Board to integrate the principles of the Healthy Rivers and Landscapes (HRL) Alternative into the final plan. The HRL Alternative offers a balanced approach to the Bay-Delta Plan by emphasizing functional flows that mimic natural seasonal patterns, directly targeting ecological benefits like improved fish habitats without excessive water diversions. HRL integrates adaptive management and real-time monitoring to optimize water use while promoting multi-benefit solutions such as groundwater recharge and floodplain restoration. This strategy supports ecosystem restoration, minimizes economic impacts, and sustains agricultural and urban water needs, making it a practical, region-wide solution to balance environmental and community priorities reducing economic losses and supporting sustainable water systems for both people and the environment.

Impacts on Agricultural Water Supply and Groundwater Sustainability

Solano County is home to a robust agricultural economy, with key crops such as wine grapes, field crops (including hay and alfalfa), fruit and nut crops, and vegetables contributing approximately \$800 million annually to the local economy and supporting thousands of jobs. The County relies heavily on surface water sources, such as the Sacramento River and reservoirs, to meet the water demands of agriculture including essential economic drivers like processing tomatoes (\$101.5 million in 2023), almonds (\$43.8 million), and wine grapes (\$35 million). If surface water allocations are reduced under the Draft Bay-Delta Plan, farmers will increasingly turn to groundwater resources to supplement their water needs.

As discussed in the Napa-Solano Regional Comment Letter, increased reliance on groundwater resources in Solano County in particular could have serious implications on the Solano Subbasin, while in return providing little to no environmental benefit. A “one-size fits all” approach with Unimpaired Flows simply does not recognize the uniqueness of each tributary, hydrological and water quality differences between tributaries, ecological differences between tributaries, and the balancing of beneficiary uses within each tributary. For example, for the Putah Creek tributary (which represents 1% of the Sacramento River watershed), little to no additional environmental benefits are expected from the Unimpaired Flow regulatory approach. So if the farmers in Solano County who rely on Putah Creek surface water must turn to groundwater resources to supplement their water needs and sustain the local economy under the Unimpaired Flow approach, the Solano Subbasin (which is currently in full compliance with sustainable groundwater management objectives due to balanced use of surface water and groundwater) could face serious and unjustified consequences.

Economic Impacts of Reduced Surface Water and Increased Groundwater Reliance:

- **Increased Groundwater Use:** With reduced surface water, Solano County's agricultural community may be forced to rely more heavily on groundwater for irrigation. The Solano Subbasin has been successfully managed for over 60 years, in large part due to reasoned surface water diversions from Putah Creek. The Unimpaired Flows approach could dismantle this work, reverting farmers to heightened groundwater use that could result in overdraft conditions in the Solano Subbasin and other, groundwater reliant areas already facing significant stress.
- **Groundwater Depletion and Rising Costs:** Over-reliance on groundwater could lead to the further depletion of groundwater aquifers, especially in areas where groundwater recharge is insufficient. As aquifers become depleted, farmers may need to drill deeper wells, which can increase operational costs due to the need for more energy and infrastructure. Additionally, water quality issues could arise if the depletion causes the intrusion of saline water into groundwater supplies, particularly in the Suisun Valley near the Suisun Marsh.
- **Cost of Groundwater Extraction:** Deeper groundwater wells could result in significantly higher pumping costs. With rising energy prices and the additional expense of maintaining deeper wells and more advanced pumping infrastructure, the overall cost of water for agricultural operations will increase. These higher costs could further strain farmers' financial stability, particularly in the context of reduced revenue from crop losses and/or transition to lower value crops due to the lack of surface water.
- **Increase in Losses in Agricultural Revenue:** If significant crops are lost due to reduced surface water allocations, the economic loss for Solano County's top 10 crops would be substantial. According to the 2023 Solano County Crop Report, these crops include processing tomatoes, almonds, wine grapes, and others, collectively contributing over \$800 million annually in agricultural and extended economic value. As groundwater becomes more expensive to extract and may not fully meet irrigation demands, the reduced value of Solano county's top crops could result in losses of \$300 million annually. These losses could be compounded by ripple effects across related industries like food processing, distribution, and retail, amplifying the regional economic impact. The shift to groundwater could further escalate costs, as farmers face higher expenses for pumping and well maintenance, adding to the financial strain.

Impacts on Groundwater Sustainability and Local Water Supply:

Solano County, like many parts of California, has invested heavily in the Sustainable Groundwater Management Act (SGMA) to ensure the long-term sustainability of groundwater resources. However, the increased use of groundwater in response to reduced surface water would undermine these efforts. The Solano Subbasin Groundwater Sustainability Plan, which covers a significant portion of the County, aims to reduce overdraft and achieve and maintain long-term sustainability. However, the increase in groundwater extraction during drought or water-restricted periods as a result of the Unimpaired Flows approach would create long-term challenges for groundwater sustainability in this basin.

- **Overdraft and Decreased Recharge:** Increased groundwater extraction during dry years, combined with drought conditions, may exceed the natural recharge rates of aquifers, leading to chronic overdraft. Groundwater overdraft in the Solano Subbasin was avoided due to surface water supplies that augment water demands and replenish groundwater aquifers. Reducing the surface water supplies would have serious consequences for the county's ability to maintain a reliable water supply for both agricultural and urban uses in the future.
- **Environmental Impacts on Aquatic Ecosystems:** Over-reliance on groundwater could also have indirect impacts on local wetlands and riparian ecosystems that depend on groundwater discharge. Lower groundwater levels can lead to reduced flows to groundwater dependent ecosystems for streams and rivers, impacting habitat for fish and other wildlife, including threatened species like salmon and steelhead.
- **Potential for Water Quality Deterioration:** The continued extraction of groundwater from over drafted areas could lead to declining water quality, with higher concentrations of naturally occurring minerals, salts, and other contaminants. For agricultural use, this could affect crop yields and quality, compounding the economic losses from reduced surface water allocations.

Employment and Community Impacts:

With the agricultural industry in Solano County already facing challenges from reduced water availability, the potential shift to groundwater reliance will further stress local agricultural operations. The increased costs associated with deeper wells and the potential reduced productivity from inadequate water supply could lead to job losses across the agricultural and food processing sectors. Many of the thousands of seasonal workers who support the County's harvest and production may lose their jobs, further impacting the local economy. Reductions in farming and ranching operations due to lack of reliable water resources will also diminish local food supplies provided by small and larger agriculture producers alike.

The additional costs to businesses, as well as the potential loss of farmworker employment and worker housing could ripple throughout Solano County's local economy, affecting retail businesses, restaurants, and service providers that rely on agricultural income.

Recommendations to the Board:

1. **Adopt Flexible Water Management Strategies through the HRL Alternative:** Given the variability of water conditions in California, we urge the Board to adopt more flexible water management strategies that allow for adjustments based on actual precipitation and runoff conditions. The HRL Alternative provides this flexibility which can help alleviate pressure on both surface and groundwater resources, ensuring that urban, agricultural and environmental needs are met without undermining the sustainability of water supplies.

2. **Stakeholder Engagement and Mitigation Plans:** We strongly encourage the Board to engage with Solano County's agricultural and water stakeholders to develop mitigation strategies that address both the immediate impacts of water restrictions and long-term concerns about groundwater sustainability. This collaboration will ensure that the needs of local communities are taken into account when making decisions about water management policies.
3. **Address Groundwater Sustainability in Water Allocation Decisions:** We urge the Board to carefully consider the potential impact on groundwater resources and groundwater sustainability when making decisions about surface water allocations. Any reduction in surface water availability should include measures to ensure that groundwater is not overexploited, leading to long-term environmental and economic consequences.
4. **Support Groundwater Recharge Programs:** To ensure a sustainable balance between surface and groundwater use, we recommend the Board support and invest in groundwater recharge programs, such as managed aquifer recharge (MAR), which can help replenish aquifers during wet years and mitigate overreliance on groundwater during dry years.

Conclusion:

The proposed changes to the Bay-Delta Plan have the potential to significantly affect Solano County's agricultural economy, the sustainability of groundwater resources, and the long-term viability of the region's water supply and the health and wellbeing of local communities. We urge the State Water Resources Control Board to truly consider impacts on local communities, ensuring that any water management decisions do not unduly stress groundwater resources or economic stability in Solano County.

Thank you for your time and consideration. We look forward to working together with the Board to ensure that water management policies protect both California's ecosystems and its agricultural communities, while maintaining sustainable groundwater management for future generations.

Sincerely,



Mitch Mashburn, Chair
Solano County Board of Supervisors

CC:

The Honorable Adam Schiff, United States Senator
The Honorable Alex Padilla, United States Senator
The Honorable John Garamendi, United States Representative
The Honorable Mike Thompson, United State Representative
The Honorable Christopher Cabaldon, California State Senator
The Honorable Lori D. Wilson, California State Assemblymember
The Honorable Solano County Board of Supervisors
Bill Emlen, Solano County Administrator
James Bezek, Director Resource Management
Misty Kaltreider, Water & Natural Resources Program Manager, Solano County
Paragon Government Relations
Karen Lange, SYASL Partners, Inc.