

#	Source	Page	Location	Detailed Comments	Response
1	CVWD, Emails 7/13 & 7/15/2020	176, 306		Dissolution would not advance efficient service provision or serve the best interest of landowners.	The District's perspective was added to the Governance Structure Option discussion on pages 306 and 176. The following was added: "CVWD contends that it plays an important role in the provision of water to its landowners and that dissolution would not advance efficient service provision nor serve the best interest of its constituents based on 1)its authority to manage water in its boundaries thereby providing a voice for district landowners in water management issues, 2) its efforts to act as a responsible steward of its resources and exercising appropriate oversight over billing and financial operations in the best interest of residents, and 3) its efforts in actively identifying capital outlays beyond city-planned improvements."
2	CVWD, Emails 7/13 & 7/15/2020	176, 306		District plays important role in in the provision of water to its landowners. Its authority to manage water within its boundaries is unique and distinct from the City or County. It exercises that power in part by negotiating water service agreements, by reviewing proposed new connections to its system, and by providing a voice for District landowners in water management issues. The District Board is a conscientious and responsible steward of its resources, and it exercises appropriate oversight over billing and financial operations. The District offsets a portion of the rates charged by the City of Napa for its rate payers.	The District's perspective was added to the Governance Structure Option discussion on pages 306 and 176. See response to comment #1.
3	CVWD, Emails 7/13 & 7/15/2020	176, 306		It is important to understand that the District's land uses and voter makeup are also distinct from those of City residents, and the City's current governance structure provides no avenue for representation of these voters. The Board is empowered and authorized to negotiate on its landowners' behalf with the City as a wholesaler, and has done so for many years.	The District's perspective was added to the Governance Structure Option discussion on pages 306 and 176. See response to comment #1.
4	CVWD, Emails 7/13 & 7/15/2020	176, 306		Though the City bears responsibility for the operation, maintenance and replacement of the District's water delivery system, that system is not included within the City's Capital Improvement Plan. The District is actively engaged with consultants and engineers to identify additional capital outlays that would benefit its landowners, including upgrades to existing deliveries, improved efficiencies, and the implementation of water storage resiliencies.	The District's perspective was added to the Governance Structure Option discussion on pages 306 and 176. See response to comment #1.
5	CVWD, Emails 7/13 & 7/15/2020	179-181, 310-312		Section 56133.5 is intended to facilitate the efficient provision of services where a deficiency has been identified: it is not intended to eliminate existing small suppliers, and it should not be used to hasten the dissolution of the District in favor of replacing one service provider for another.	Comment acknowledged. In the case of CVWD and the City of Napa, greater potential for efficient services by eliminating duplicative overhead costs was identified. No changes made.
6	CVWD, Emails 7/13 & 7/15/2020	299, 310,312	Financial Planning, Recommendations, Determinations	CVWD has had no website but expects to have one in place by the fall of 2020.	Comment has been added to the text.
7	CVWD, Emails 7/13 & 7/15/2020	299, 303, 310, 311	Financial Planning, Infrastructure Needs, Recommendations, Determinations	CVWD is actively engaged with consultants and engineers to identify additional capital outlays.	Comment has been added to the text.
8	City of American Canyon, Correspondence 3/5, 5/14 & 8/3/2020	71, 91, 99	Service Area, Governance Structure Options	City of American Canyon contends that its water service area extends far beyond the city limits based on the former boundaries of American Canyon Water District that was merged into the City of American Canyon during incorporation.	Addressing this issue through LAFCO staff and legal counsel meetings with City Manager and Attorney. Sentence added to reflect ongoing discussions and intent to solidify consensus between LAFCO and the City.
9	Bruce & Carol Barge, Email 7/17/2020	151	Second paragraph	There are multiple concerns regarding the Napa Oaks II project, including majority of site would need water/sewer infrastructure and create runoff, the holding pond on Casswall could threaten neighborhood during breach/flood, high groundwater levels, the number of mature oak trees, the presence of an earthquake fault, limited ingress and egress for the property, proposal of a roundabout, and lack of proposal of affordable housing. The author has concerns of higher density uses proposed as part of the City of Napa's General Plan.	Content added identifying public concerns regarding the proposed development.

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10	Leon Brauning, Email 7/12/2020			I oppose any cooperative organization of municipal facilities that includes the city of American Canyon. American Canyon does not seem to have had adequate water, sewage disposal, schools, or traffic controls for its own town and citizens. But, they have kept building houses and growing businesses and industry for the past 25 years in the city as if they had an unlimited supply of facilities. Now they have approved the Watson Ranch housing development of approximately 1,200 new homes while the water supply and all other infrastructure seem tenuous. Because of these issues I can't perceive what facilities American Canyon has to offer to this new county organization.	Comment acknowledged. As one of the primary municipal water providers, it would be contrary to the purpose of forming a countywide entity for regional water resource management, if the City of American Canyon were excluded from the collaborative efforts. No change made
11	City of Calistoga, Email 6/29/20			Technical corrections.	Edits made per City's corrections.
12	City of Napa, Letter 6/26/2020	176, 308	Expansion of the City's SOI and Annexation of CVWD Territory	Given that an SOI amendment aligns with LAFCO's purpose to encourage logical boundaries and promote efficient delivery of services, further discussion and analysis of LAFCO policy and options associated with an SOI amendment is warranted in this section rather than concluding that an SOI amendment is not feasible.	Content added to clarify the lengthy process that would be involved in a SOI and RUL amendment, making this option not feasible in the short term. This option is, however, a potential in the long-term as described.
13	City of Napa, Letter 6/26/2020	178, 310	Dissolution and Continued Services by the City of Napa	This section should be modified to account for the possibility that Government Code 56133.5 expires on January 1, 2021 and identify options under Government Code 56133.	Content updated to account for existing circumstances. Should this code section expire, there does not appear to be a manner to make use of Government Code 56133 in its stead as no impending threat to the health and safety of the public exists and the area is not within the City's SOI.
14	City of Napa, Letter 6/26/2020	6, 45, 100, 140, 144, 183, 188, 226, 229, 266, 271,	Recommendation #2	The recommendation should be modified to recommend that the City comply with future County policy for approved uses and locations for trucked water in unincorporated areas.	Recommendation added throughout report that the County should establish a policy for approved uses and locations of transported water to manage the use of trucked water in unincorporated areas. In addition, cities should also adopt policies to ensure cohesive water planning and growth management.
15	NRRD, Letter 6/24/2020	398	Capital Assets, 2nd para.	Clarify that NRRD commissioned studies to evaluate flood control options and facilities.	Text has been added to the report. Also made corresponding edit to "Present and Planned Capacity" determination, second para., pg. 407.
16	NRRD, Letter 6/24/2020	400	Type and Extent of Services	Text should be added to clarify that NRRD does not own levees, which are the maintenance responsibility of private property owners.	Text has been added to the report. Also added reference to Governance Structure Options which could be considered that could provide enforcement of maintenance standards on private property which NRRD currently does not possess.
17	NRRD, Letter 6/24/2020	405	Governance Structure Options	Several years ago residents voted against the formation of a CSD. The MSR does not discuss the projected costs of reorganization.	Text added to note that residents previously voted against forming a CSD, according to NRRD. The MSR indicates that a CSD continues to be an option, among others, and that further action including evaluations of costs and benefits should be deferred until completion of current technical studies of facility alternatives. Formation of a CSD was not among the recommendations, unless necessary to continue wastewater services in the event the area became a zone of NCFWCWCD for the purpose of providing reclamation services.
18	NRRD, Letter 6/24/2020	405	Governance Structure Options	The MSR suggests that NRRD could become a zone of NCFWCWCD which does not provide wastewater services; the MSR does not indicate what entity would provide wastewater services, or what reclamation services the NCFWCWCD would provide.	On page 406 the MSR states that in the event of a reorganization of flood control services with NCFWCWCD, "NRRD's wastewater services could continue as is or could be reorganized into a CSD...". NCFWCWCD would continue to provide advisory and technical services related to flood control as it is currently doing, as stated on pg. 405, and as it did prior to formation of NRRD when the area was a zone of NCFWCWCD. The specific services and facilities would depend on the outcome of current studies regarding alternatives for facilities, services and funding to the community.

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19	NRRD, Letter 6/24/2020	405	Governance Structure Options	If an entity (NRRD, NCFWCD, or otherwise) were to purchase property rights to the private levees and ultimately improve them, it is likely that such an action would result in increased assessments against the parcels. The Review does not address the anticipated amount of the increase in assessments.	Comment acknowledged. The costs of public purchase of property are not known at this time and would need to be determined before assessments could be calculated.
20	NRRD, Letter 6/24/2020	406	Recommendations, #2	The NRRD website is compliant with Government Code section 54954.2. Section 54954.2 does not require the NRRD to post budgets and financial reports on the website. These documents are available at the NRRD Board meetings, at the NRRD office, and upon request.	Government Code Section 54954.2 requires a direct link to the agenda on the agency's website; NRRD provides the link in a contextual menu, which is not allowed if it is the only link to the current agenda. While State statutes do not require posting of financial information on an agency's website, it is considered a "best practice" and improves open and transparent communication of critical information to residents and other stakeholders.
21	NRRD, Letter 6/24/2020	407	Status of, and Opportunities for, Shared Facilities	The MSR recommended that "NRRD and its residents should explore opportunities to work with the Napa County Resource Conservation District (NCRCD) to educate constituents with regard to activities to control settlement along their portion of the levee." At this time, the NCRCD does not have expertise regarding levee maintenance. However, this fact should not to discourage the NRRD or residents from utilizing the NCRCD in other capacities.	Comment acknowledged.
22	Mary O'Brien, Email 7/13/2020			Berryessa Estates (LBRID) resident, water quality issues and rates too high.	Comment acknowledged. The MSR indicates on page 325 a significant increase in complaints related to water taste, odor and color, which the District investigated. In 2018 the State identified a number of actions required to protect water quality, which were addressed by the District as noted on page 326. The MSR notes in the LBRID Chapter under "Rates and Charges" pg. 319 and in the financial determinations pg. 333 that rates are high, and exceed standard indicators relative to average household incomes.
23	Patricia Damery, Email 6/28/2020			Formation of a county agency coordinating water security in Napa County is a critically important move as we face climate disruption and the real possibility of losing the water of the North Bay Aqueduct. I am in full support of coordinating the efforts of the forming Groundwater Sustainability Agency with the Drought Contingency Task Force, and troubleshooting in advance various emergency scenarios.	Comment acknowledged.
24	Patricia Damery, Email 6/28/2020	44-45		Several residents' wells have gone dry and they are now forced to truck water because they cannot afford to drill another well. Still, vineyards and wineries are being permitted by the Napa Board of Supervisors and Planning Commission. These are properties with multiple, low-performing wells, approved, despite the fact that hydrologists have warned that additional newly drilled wells are almost certainly affecting other established Redwood Road wells and Redwood Creek flow. When trucked water is not taken into consideration, a skewed perspective on water availability is perpetrated. Trucked water from Napa City is a source of revenue for the City, but in the event of severe drought and the possibility that the North Bay aqueduct does not deliver the water the municipalities in Napa County depend upon, the trucked water to these rural residences will also dry up.	Comment acknowledged. The concerns regarding trucked water are identified in the relevant city chapters and in the Overview Chapter on p. 44-45. It is recommended in the report that both the cities and the County ensure that the type of use and location of use of trucked water be clearly defined in policy.
25	Patricia Damery, Email 6/28/2020			Many of the residents whose wells run dry and are forced into hauling water are often long time, older residents. They have been impacted by the excessive drilling of new wells near them and they cannot afford to another deeper well.	Comment acknowledged. The Napa County Groundwater Sustainability Agency has been charged with managing groundwater within the County, and as such this issue is under the purview of the newly formed agency. Certainly, coordination with any new water agency will be essential in comprehensively ensuring sustainable water resources.
26	Town of Yountville, Letter 7/10/2020	264-265	Recommendations	The Yountville Town Council was unanimous in their support of the recommendations as presented in Chapter 8 of the study.	Comment acknowledged.

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27	Town of Yountville, Letter 7/10/2020	264	Countywide Water Agency	The Council is supportive of continuing the work and conversation related to the annexation of the Domaine Chandon parcel and the discussion to encourage and evaluate the potential creation and implementation of a countywide water district or other regional approach.	Comment acknowledged.
28	Town of Yountville, Letter 7/10/2020	54, 264	Next Steps	The Council is keenly interested in continuing the momentum of this study and expressed interest in appointing representatives to be part of a regional discussion.	Comment acknowledged. Content added in Next Steps discussed in Governance Structure Options suggesting discussions continue with representatives from each agency. Support of the recommendation by the Town added in Chapter 8 Governance Structure Options.
29	Roland Dumas, Ph.D Letter 6/17/20	5	Exec. Summary, Financial Ability to Provide Services	There is a need to plan for improbable yet inevitable surprises, and scenario planning to consider where failures can occur and eventually will; recommend the use of services of a qualified scenario planning consultant along with the traditional water-focused resources.	Comment acknowledged. Text has been added to the report to emphasize the importance of considering governance options as one way to mitigate the potential financial impacts of catastrophic events, for example, COVID-19, and other unforeseen circumstances.
30	Francis Freibert, Email 7/13/2020	319, 333		Lake Berryessa Estates (LBRID) water/sewer bill \$600/mo, County didn't help community with grant funding (all spent on fixing a neglected water system).	Comment acknowledged. The MSR notes in the LBRID Chapter under "Rates and Charges" pg. 319 and in the financial determinations pg. 333 that rates are high, and exceed standard indicators relative to average household incomes.
31	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	1, 13		The City uses non-potable water from a well in the small park to the north just before the Pope Street Bridge to irrigate Jacob-Meily Park and other nearby areas, as correctly noted on page 205, second paragraph, under Stonebridge Wells.	Comment acknowledged. The descriptions on p. 1 and 13 provide a summary of service structure without all details. Details surrounding delivery are reported within each agencies specific chapter.
32	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	4	First paragraph under Recycled Water	The second sentence states: "The City of St. Helena is considering implementing a recycled water program." As noted in the third sentence of the third paragraph under the same heading, the City must complete substantial improvements at its wastewater facility to "make recycled water services feasible." It seem that any meaningful consideration of "implementation" is significantly premature at this time, and the second sentence should be stricken.	The City's plans for recycled water provision are important and relevant to the report, although they may be long-term. The necessary improvements to the wastewater facility and plans to address those needs, it is timely that the City also consider upgrades that allow for recycled water. No change made.
33	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	187		Manner of Selection under Governing Body is not correct. The St. Helena mayor stands for election every two years. Also, under Governing Body all members are "Council members," including the mayor and vice-mayor.	Clarified.
34	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	187		Under Purpose (Municipal Services Provided: "solid waste (Upper Valley Disposal & Recycling). " St. Helena residents contract directly with Upper Valley to provide waste disposal; the City is not involved. Now, it may be that the intent is that Upper Valley also provides disposal services to the City itself (like any other customer). This could be clarified in further discussion with City staff.	Comment acknowledged.
35	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	190	First sentence	Clarify that the City provides only untreated raw water, not recycled water.	This section does not describe water services provided. No change made.
36	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	194-196	Balanced Budget, Reserves, Rates	second paragraph. Insert "projects" after capital. More importantly, the statement about the adequacy of recently adopted rate increases on the wastewater side seems inconsistent with the statement on page 219, addressing the financing of the planned wastewater upgrades (as required under a RWQCB Cease & Desist Order): "The next step is determining a funding plan consisting of some combination of a general fund loan, bonds, and a USDA rural fund loan etc." It would appear, in short, that the current wastewater rates are not sufficient to fund regulatory required upgrades at the wastewater plant. The same would also appear to be true with respect to Water Enterprise capital projects; see discussion under point 11, addressing the obsolete Meadowood tanks.	The recommended edit to "capital <u>projects</u> " was made. The discussion of rate adequacy on pg. 194 was edited to note that "...the City has indicated that non-utility funding sources such as General Fund loans may be part of a funding plan for major utility improvements, for example wastewater plant upgrades" to acknowledge the information provided on pg. 219. Other financial sections of the St. Helena chapter have been edited to include analysis from July 30, 2020 indicating the inadequacy of current rates to fund the recently updated infrastructure cost needs.

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37	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	195	First sentence	The sentence appears to be stating that fund balances and reserves are sufficient to fund longer-term capital needs, but per page 219 (wastewater) and 211 (water) that does not appear to be correct.	See prior response.
38	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	204	Bell Canyon Reservoir, second paragraph	As explained in a prior email to LAFCO, the City's storage diversion and storage right is 1800AF under Division of Water Rights Permit 9157 (1952). Division of Water Rights Permit 14810 (1973) would have increased the City's diversion and storage right by an additional 2000AF, bringing the total to 3800AF. However, the Bell Canyon Dam was never raised as contemplated in Permit 14810, so that the diversion and storage right remains at 1800AF. See page 209, correctly stating that Bell Canyon Reservoir has a storage [right] capacity of 1800 AF. (The estimated total capacity of the Reservoir is around 2350AF.)	Reference to right to divert and store 3,800 AF deleted for clarity.
39	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	205	Second paragraph	The 2020 annual cost is approximately \$1.5 million (\$2500 per AF). City Finance Staff can provide the precise annual cost figure.	Updated.
40	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	206	First paragraph, Lower Reservoir	The third sentence reads: "In 2019, 11 customers pumped water from the reservoir." Customers do not pump from Lower Reservoir (which is fenced in) but from a water station adjacent to RLS Middle School.	Clarified.
41	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	206	Emergency preparedness	After mention of the capped well on the city-owned Adams Street property, the text continues: "It is unknown what volume of water might be expected from the well as it is capped." The City in fact tested flow rate of the well in, I believe, 2011, with a written report. The well's productivity was not unknown, at least then. (My understanding is that the well was drilled shortly before the City's purchase in 2000 of the Adams Street property. The purpose was to support a high price for the property (at that time).)	The City has not provided any information related to the flow or volume of water that can be expected at the well. No changes made.
42	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	211	Storage Facilities	The statement is made that the City has yet to find a funding source to replace the three Meadowood storage tanks. To be clear, the Meadowood tanks are assets of the City's Water Enterprise, and are so listed as among the owned assets of the Enterprise in a formal listing on file with State Water Board (State Assigned Nos. T003, T004, T005). As they are capital assets of the Water Enterprise, their replacement cost is a responsibility of Water Enterprise ratepayers. The fact that the City is looking for funding sources not just shows that the replacement cost is not sufficient as estimated in the current rate base (if included at all) but also indicates that the Water Enterprise does not have the capital in the current rate base (after the recent increases) to address an immediate and major (around \$500,000 but check with City staff) capital improvement need.	Updated to reflect the City's CIP for FY 19-20 which shows identified funding sources for the Meadowood tanks.
43	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	214	First full paragraph	States that the Public Works Department "set aside funds to replace the obsolete redwood tanks that serve the Madrone Knoll area and the Meadowood resort." See point 11 immediately above. It seems clear that the City has not set aside funds for replacement of the three tanks because it is looking for a funding source to replace them.	Updated to reflect the City's CIP for FY 19-20 which shows identified funding sources for the Meadowood tanks.
44	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	225	Fourth paragraph under Relationship with Regional Goals and Policies, third sentence	St. Helena Municipal Code section 13.04.050 H. prohibits connections outside City limits except for fire safety. My understanding is that this is a long outstanding prohibition in the City's water ordinance (going back decades) so that the word "now" is also not appropriate.	Discussion and recommendations corrected to reflect the City's municipal code. 13.04.080 B.

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45	Alan Galbraith, St. Helena Mayor 2014-18 Letter 7/25/2020	212		The GP incorrectly states that the City has the right to divert and store 3800AF. The 3800 AF combines the storage "right" on State Water Board Permits 9157 (1800 AF and 14810 (2000 AF). However, the City never raised the Bell Canyon Dam in accordance with Permit 14810. Hence, the City never earned the 2000 AF storage right conferred in that permit. Our storage right is 1800AF. Now, actual storage capacity at Bell Canyon is about 2300 AF. Two points: (1) a storage right to my understanding is not issued in excess of the physical storage capacity of a reservoir; (2) a certain amount of capacity is reserved for fire protection (roughly 500 AF at Bell Canyon). The Coty's storage right is in consequence well under the reservoir's capacity.	Reference to right to divert and store 3,800 AF deleted for clarity.
46	City of St. Helena, Letters 7/14/20 and 7/20/2020	223	Recommendation #1	The City concurs with the recommendations to update water service planning documents and is currently working on an Integrated Utility Master Plan addressing Water, Wastewater and Stormwater needs for the City with a virtual City Council workshop being held on July 30, 2020 to discuss the draft documents.	Content added recognizing City's efforts to update planning documents on p. 223.
47	City of St. Helena, Letters 7/14/20 and 7/20/2020	223	Recommendation #2	The City concurs with the recommendations to further water supply studies assessing future use of existing sources and identifying potential new sources.	Comment acknowledged.
48	City of St. Helena, Letters 7/14/20 and 7/20/2020	193	Recommendation #3	Agree that Municipal Sewer District No. 1 should be eliminated. The adopted General Plan Policy LU1. 2 essentially covers no utilities beyond urban limit line therefore those within should be allowed to connect without annexation. The City will need to further evaluate and potentially consider LAFCO's recommendation to eliminate the St. Helena Municipal Sewer District No. 1.	Comment acknowledged.
49	City of St. Helena, Letters 7/14/20 and 7/20/2020	203	Overlapping Service Providers	The City concurs with the recommendations to evaluate existing duplicative water services provided by the City of St. Helena and the City of Napa in the Rutherford Road area, which is outside both cities. It is important to note that the City of St. Helena does not allow for new water services outside the City limits therefore new duplicative services are unlikely.	Content added to reflect that the City does not allow new water service connections outside of its city limits, thereby minimizing the chances of duplicative services occurring.
50	City of St. Helena, Letters 7/14/20 and 7/20/2020			Technical corrections.	Corrections made where appropriate.
51	City of St. Helena, Letters 7/14/20 and 7/20/2020	222, 225		The City believes the recommendation regarding unlimited non-potable water services is in error since the St. Helena Municipal Code 13.04.080 B. Nontreated (Raw) Water from Lower Reservoir specifically restricts usage to within the City and users are required to have a permit and/or contract agreement. However, there is room for improvement at the specific raw water station which is operated on the honor system. Improvements to the raw water station were identified in the 2017 adopted rate study as a future capital improvement project.	Discussion and recommendations corrected to reflect the City's municipal code. 13.04.080 B.
52	City of St. Helena, Letters 7/14/20 and 7/20/2020			The City concurs with Napa LAFCO's recommendation to consider including the noncontiguous city-owned properties in the City of St. Helena's SOI during its next update, or if LAFCO wishes to continue the practice of excluding these properties from the City's SOI, then it may consider clarifying its intent in its policies.	Comment acknowledged.
53	City of St. Helena, Letters 7/14/20 and 7/20/2020	54		LAFCO should include recommendations in the MSR study regarding the protection of all municipal watersheds throughout the County by creating water quality buffer zones in the Agricultural Watershed Districts and to establish regulations related to oak tree and oak woodland removal due to development and vineyard conversions.	Comment acknowledged. While review of watershed protection was outside the scope of this review, it could be considered as a responsibility of the proposed countywide water agency. Content added to p. 54 to reflect that watershed stewardship and protection could be included under the jurisdiction of the proposed countywide agency.
54	City of St. Helena, Letters 7/14/20 and 7/20/2020	194		LAFCO should include a recommendation in the MSR study that the County of Napa establishes a policy to consult with and require joint jurisdiction approval in conjunction with a County permit if a proposed project, such as a vineyard conversion, is within another jurisdictions municipal watershed.	Comment acknowledged. A benefit of a countywide water agency could be improved coordination between agencies on these kinds of regional water/watershed policy issues. City concerns added to Growth and Population Projections in city chapter on p. 194.

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55	City of St. Helena, Letters 7/14/20 and 7/20/2020	54		LAFCO should include a recommendation in the MSR study for the County of Napa and City of St. Helena to jointly engage in a Bell Canyon watershed study. Such a study could include the creation of a watershed runoff computer model which considers weather patterns, topography, land use, land cover, air quality, septic systems, water diversions and potential projects that threaten the City's municipal water supply.	Comment acknowledged. While review of watershed protection was outside the scope of this review, it could be considered as a responsibility of the proposed countywide water agency. Content added to p. 54 to reflect that watershed stewardship and protection could be included under the jurisdiction of the proposed countywide agency.
56	City of St. Helena, Letters 7/14/20 and 7/20/2020	231	Governance Structure Options	The City is currently in design and the start of environmental review of the planned upgrades to the wastewater treatment plant to tertiary level treatment. The completed project presents an opportunity to eliminate septic or other stand alone treatment systems both within the City and potentially other nearby unincorporated properties. Therefore, the City is recommending LAFCO's support now for any private unincorporated properties that may be interested in establishing a city sewer connection under the pilot provisions of Government Code 56133.5.	Additional information added in Governance Structure Options section in City chapter.
57	ICARE Letter 7/19/2020	5	Item 2	We recommend that any/all data information collected by agencies is not only readily available in a format that is easily interpretable, but completely public and are requesting written assurance that this will be the case.	Clarified that the recommendation includes public access to collected data.
58	ICARE Letter 7/19/2020	6	Item 6	We recommend that any/all reporting requirements are also readily available and accessible to the public, and also request written assurance that this will be the case.	Comment acknowledged. As a public entities, all cities and districts already must comply with information requests in accordance with State law. This item is specific to ensuring that each agency is meeting reporting requirements of the regulating agencies. No change made.
59	ICARE Letter 7/19/2020	17	Item 7	It should be noted that the trend for greater urgency in developing groundwater storage and banking is not without controversy.	Comment acknowledged.
60	ICARE Letter 7/19/2020	24		The statement that "there are currently no Napa County water bodies on the Environmental Protection Agency/EPA's 303(d) list of impaired waters" is incorrect. The Environmental Protection Agency/EPA must list according Clean Water Act/CWA all waterbody- ies such as rivers, lakes and streams on the 303(d) list for development of programs to address the pollutant that is causing the listing so as to reduce the pollution. Napa County has several waterbodies listed on the 303(d) list: James Creek, Kimball Creek, Napa River, Lake Berryessa, Suisun Creek, and Ledgewood Creek.	Correction made.
61	ICARE Letter 7/19/2020	33		While unincorporated areas of Napa County rely principally on groundwater resources and surface water collection and incorporated areas typically rely on local reservoirs and regional water providers, we recommend that all agencies using reservoirs behind dams for water supply are in regulatory compliance in their public trust duties to bypass for fish and wildlife pursuant to California Fish and Game Code Section 5937; if not, these dams remain vulnerable to litigation, whose expense should be anticipated and prepared in their respective plans and budgets. If municipalities became compliant with 5937, less water would be available for future development. The water is NOT all for agricultural pumpers and municipalities, as the streams must be healthy for fishing, swimming and recreation as dictated by the Public Trust Doctrine.	Comment acknowledged. Any identified issues regarding bypass for fish wildlife are addressed in each agency's respective chapter.

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62	ICARE Letter 7/19/2020	51		An additional challenge to reorganization are those dams deemed risky and therefore, unsafe, by California's Division of Safety of Dams, as any updating and/or failure would affect rates, such as Milliken Dam at risk of failure due to stress fractures at the face of the dam, whereby Napa City Public Works signed an engineering contract with the Division of Dams and Safety several years ago to reduce the surface elevation of stored water behind the dam to try to lessen the stress on the cement surface of the dam. It has been determined by Division of Dams and Safety engineers that Milliken Dam could fail given an 8 Richter scale earthquake. This dam is on the 'watch list' of the State due to it's degraded condition.	Seismic concerns of Milliken Dam are identified on page 164.
63	ICARE Letter 7/19/2020	126		The City of Calistoga's water system has grown from a small municipal reservoir in Feige Canyon in the first half of the century...". The year was 1918, and the first half of the former century.	Corrected to read "former century."
64	ICARE Letter 7/19/2020	127		Although Kimball Dam is categorized as a high-risk dam with high downstream hazards, a second, city owned and operated dam has not been included in this review: Feige Dam on Cyrus Creek is out of compliance with CFGC Section 5937 and remains vulnerable to litigation.	Added content re: Feige dam on p. 131.
65	ICARE Letter 7/19/2020	133		The statement that, "Similar to the water system, most of the wastewater customers are residential" needs clarification. A large volume of used geothermal water utilized by municipal spas flows into the City of Calistoga's Dunaweal Wastewater Treatment Plant. The method by which each spa's input has been calculated needs to be specified, i.e., whether one spa considered a single customer and single connection, whether customers/ connections calculated by the number of rooms, etc.	The reference in the document is to the absolute number of service connections, which are predominantly residential.
66	ICARE Letter 7/19/2020	134		The statement that "Inputs to the sewer system are mainly domestic in origin and include residences, hotels, and geothermal spas" needs additional clarification as well since as restaurants, micro-breweries, and mineral water bottling companies that also discharge to the sanitary system are considered commercial in the review. Please clarify how commercial spas and hotels are considered residential.	Domestic wastewater is similar in this case to domestic water (drinking water), which includes most uses in a municipal wastewater system, not only residential. Clarified on p. 134.
67	ICARE Letter 7/19/2020	135		Correction: Following tertiary treatment, effluent from the Dunaweal WWTP is permitted to be discharged to the Napa River from Nov. 1 – June 15, and not Oct 1. – May 15. (Page 124 records the dates correctly.)	Corrected.
68	ICARE Letter 7/19/2020	137, 141		Correction: The dates of the Cease and Desist Orders (CDO) were 2010 and 2014, and were related to resolving effluent discharge requirements because of inadequate dilution to the Napa River and non-compliance with antimony, dichlorobromomethane, chlorobromomethane, and BOD limits.	Corrected.
69	ICARE Letter 7/19/2020	203		When regulations are implemented by the newly formed Groundwater Sustainable Agency, St. Helena will need to reduce their groundwater pumping and be sustainable for future generations.	Comment acknowledged. The degree of groundwater pumping will be determined by the Groundwater Sustainability Agency.
70	ICARE Letter 7/19/2020	205		We also requested the distance from a third well cited as being near the Napa River, but did not receive benefit of a reply.	The exact location of wells was not located as part of this report, as the location of water supply (while generally readily available) is considered a potential threat to public health.
71	ICARE Letter 7/19/2020	207		Of the City of St. Helena's 268 commercial water supply connections, please clarify how each inn, hotel, and other lodging facility are accounted for.	Connections are defined by a link to the City's system. In most cases, hotels and lodging facilities have a single connection to the municipal system.

#	Source	Page	Location	Detailed Comments	Response
72	ICARE Letter 7/19/2020	213		We inquired with the City of St. Helena as to the specifics of contaminants impairing the Stonebridge Wells originating with the sewer collection system, but did not receive benefit of a response.	Drinking Water Source Assessments conducted by the California Department of Health Services identify <u>potential</u> hazards to public drinking water sources to promote preventative actions. As of the drafting of this report, there were no known instances of the sewer collection system contaminating the Stonebridge wells.
73	ICARE Letter 7/19/2020	216		We requested the communications from the State of California that support a Meadowood resort connection to the City's wastewater treatment system, but did not receive the benefit of a response. Because the Napa River continues to be impaired due to pathogens since 2006, it is the opinion of ICARE that the City of St. Helena should initiate a ban on new sewer connections to their wastewater treatment system. The ban should include Meadowood resort, until the wastewater treatment plant and other wastewater infrastructure upgrades and improvements are completed and approved by the SFBRWQCB. The City must demonstrate that their wastewater treatment systems are adequate so the public can be assured that future violations will not occur.	Comment acknowledged.
74	Dan Mufson, Ph.D., Representing Napa Vision 2050, Letter 7/13/2020	48		Supports countywide agency option, there are other recent/ongoing major gov studies on water (groundwater sustainability plan, drought contingency plan), problems must be collectively solved through consolidated (as opposed to fractured) system. Recommend that the Ground Water Sustainability Agency and the Drought Contingency Task Force come up with a format so that their work product will be a plan for all of Napa's water users to share the diminishing supply that belongs to the commons and will meet the human right to water.	A countywide water agency is proposed to be responsible for comprehensive accounting of water supply and demand in the county, and could act as a single source of information or clearing house to better leverage available resources. The lack of an existing provider of this service added to the discussion of challenges leading to the recommendation of a countywide water agency on p. 48.
75	Eve Kahn, Alternate Public Member LAFCO, Email 7/18/2020	54		Recommend exploring combining the private water systems with a larger water agency/authority.	Content added to p. 54 with regard to the potential inclusion of interested mutual water companies in the new county agency.
76	Eve Kahn, Alternate Public Member LAFCO, Email 7/18/2020	44		Want to reinforce the comments made on page 44 regarding the need for County of Napa trucked water policies (referenced below.) Sadly, the County approves development on parcels with constrained water availability and often supports the use of trucked water as an option for business sustainability.	Recommendation added throughout report that the County should establish a policy for approved uses and locations of transported water to manage the use of trucked water in unincorporated areas. In addition, cities should also adopt policies to ensure cohesive water planning and growth management.
77	Eve Kahn, Alternate Public Member LAFCO, Email 7/18/2020			The County's Conservation Regulations clearly state that the priority use for groundwater is agriculture and rural residential. In essence, cities are to use surface water, unincorporated users are to rely upon groundwater. But when potable water is used to sustain agricultural operations (vineyards or winery operations) in non-emergency situations, the lines are blurred between rural and urban uses. When looked at from a broader perspective questions like "Should the cities have access to groundwater in a severe emergency?" can be addressed.	Comment acknowledged. Policy issues such as these may be best addressed during the formation and implementation of the proposed countywide water agency to ensure consistency throughout the County and consensus among the purveyors.
78	County of Napa, Letter 8/3/2020			County Staff continue to support LAFCO's recommendation to explore establishment of a centralized water agency, and again would like to emphasize that Napa County decision makers and staff need to be an integral part of the governance structure. All unincorporated Community Service Districts (CSD's) and Community Service Areas (CSA's) should also be included in the agency's management responsibilities.	Comment acknowledged. While the authors agree that the most beneficial structure would be inclusive of all water and wastewater providers, the nature and extent of inclusion, which may vary by type of agency and depend on services provided by the countywide agency, would need to be determined by consensus the agencies as recommended in the MSR.

#	Source	Page	Location	Detailed Comments	Response
79	County of Napa, Letter 8/3/2020	51		The recommendations for centralized water agency should include direction discouraging annexation of unincorporated areas that currently receive municipal water or sewer service, to protect existing farmland and open space. Establishment of a centralized water agency would suggest that efficient services can be provided by the agency without need for cities to expand.	Efficiency of services greatly depends on existing and available infrastructure to provide services. In the areas surrounding the cities, often times the City is best poised to provide these services because the infrastructure is in place and capacity exists. Laws affecting annexation through LAFCO would continue to be in effect for the cities. In the case of a countywide agency, the location of services to be provided would need to be clearly defined in order to control extension of municipal systems into the unincorporated areas. Text regarding the need for a countywide agency to clarify a potential service-specific SOI, and an example of this type of SOI to avoid undesirable service extensions, has been added on p. 51.
80	County of Napa, Letter 8/3/2020	45		The DMSR recommends the County and cities/town establish a policy regarding trucked water. Napa County staff are open to exploring this topic further. However, we request that LAFCO acknowledge that the County currently regulates trucked water through our discretionary and ministerial permitting processes. The vast majority of existing trucked water sold by municipalities is entirely outside of the County's control, and even outside the cities' control for water purchased from outside the county, through a broker, or other third party.	Content added to clarify County existing control measures on p. 45.
81	County of Napa, Letter 8/3/2020	55		We appreciate that the DMSR was updated to include discussion on the potential disadvantages, and challenges that would be need to be overcome, to create a centralized water agency. We also appreciate that the County was included in the recommendations regarding coordinating efforts on efficient service of water to unincorporated areas. We encourage LAFCO to emphasize that all planning activities for efficient water and sewer service within unincorporated areas only occur in coordination with the County.	Added content on p. 55 to clarify that discussions regarding the centralized water agency should include the 14 agencies reviewed, the County, the Groundwater Sustainability Agency, and interested private companies.
82	County of Napa, Letter 8/3/2020	43	Overview - Recommendations - Growth Policies	Thank you for expanding on the historical context of out-of-agency water and sewer development within unincorporated areas. The County again would like to emphasize that virtually all of the water and sewer lines that presently exist outside of city limits occurred prior to the establishment of LAFCO and smart growth policies. These are pre-existing conditions, and we urge LAFCO to discourage actions that would lead to annexation of these preexisting municipality-served unincorporated lands.	Comment acknowledged. All out of area extensions of service and all annexations must now meet legal requirements governing LAFCO review/approval, such as annexation consistency with the agency's SOI and tax sharing agreement with the County, which puts in place checks to ensure annexations are conducted in a logical and orderly fashion and ensure the County is part of the process. Additionally, the preexisting out-of-area connections are well documented as part of this MSR, which will enable informed policy decisions.
83	County of Napa, Letter 8/3/2020			Thank you for augmenting the DMSR regarding Assembly Bill 402 (Dodd) from 2016 regarding the pilot program for municipal services to unincorporated areas, and for including additional information on the Groundwater Sustainability Agency (GSA).	Comment acknowledged.
84	County of Napa, Letter 8/3/2020	331-332, 373-374	Governance Structure Options, Recommendations, #5	The County is concerned about converting the Resort Improvement Districts to CSAs and adversely affecting the ability to compel connections to the system. The County states that it has thoroughly investigated organization options in the past, but they are open to "re-looking at the situation."	The prior 2011 MSR evaluated reorganization of the resort districts into CSDs, but did not consider the feasibility of conversion to CSAs, which are recommended in the current MSR. The MSR recommends further research to assure that the districts' ability to compel connections to the system is not adversely affected.
85	County of Napa, Letter 8/3/2020	406	Recommendations, #3	Napa County staff support the recommendation to defer any governance reorganization actions on the Napa River Reclamation District (NRRD).	Comment acknowledged.

#	Source	Page	Location	Detailed Comments	Response
86	County of Napa, Letter 8/3/2020			County staff remain concerned that annexation of the Domaine Chandon property to the Town of Yountville is still included as a recommended action, but appreciate that the recommendation was modified to reflect that coordination with the County is necessary. The DMSR provides an incomplete description of the background events leading to the current situation at Domaine Chandon. Yountville allowed the development to proceed in the early 1990's without annexation despite having an annexation agreement with the property owner. The DMSR should evaluate why this occurred before a recommendation can be formed. Also, the recently adopted Sphere of Influence (SOI) boundary does not follow existing property lines, does not account for existing buildings, and bisects the existing land use entitlement (i.e. – winery use permit), all of which represent issues that need to be addressed to enable annexation. It is quite possible that the SOI boundary will need to change before annexation can occur. As such, the DMSR recommendation should be deleted or changed to suggest annexation not occur unless and until new development has been proposed.	Content added regarding County's concerns.
87	Bill Moseley, Letter 8/31/20			Technical corrections.	Corrections made where appropriate.
88	Diane Dillon, Vice Chair LAFCO Workshop 7/13/2020			Asked if past analysis of RID governance options were reviewed and incorporated into the report.	The consultant reviewed prior materials provided by LAFCO, including the 2011 MSR described in the current MSR in the RID governance options section, which addressed reorganization of the RIDs into CSDs; the option of reorganizing as a CSA was not considered. County staff indicated that, despite past exhaustive analysis of reorganization options, they were open to re-looking at the situation (County's comments Aug. 3, 2020).
89	Brad Wagenknecht, Commissioner LAFCO Workshop 7/13/2020	15	Water and Wastewater Service Providers	Suggested the small water companies who may have no protection be included in the MSR and any regional option under consideration.	Additional content added to discussion of non-public water systems in Napa County. Content added to p. 54 with regard to the potential inclusion of interested mutual water companies in the new county agency.
90	Kenneth Leary, Chair LAFCO Workshop 7/13/2020	15	Water and Wastewater Service Providers	Concerned regarding the lack of oversight/regulation of the mutual water companies. Perhaps this could be looked at further in the future.	Comment acknowledged. Content added to p. 54 with regard to the potential inclusion of interested mutual water companies in the new county agency.
91	Diane Dillon, Vice Chair LAFCO Workshop 7/13/2020	15	Water and Wastewater Service Providers	Requested the MSR be revised to add a map showing all mutual water companies in Napa County and a 4-column chart with each one's (1) service area/ acres, (2) population, (3) number of connections, and (4) water source (wells vs surface water). And include in discussion regarding the countywide solution.	Additional content added to discussion of non-public water systems in Napa County. Content added to p. 54 with regard to the potential inclusion of interested mutual water companies in the new county agency.
92	Margie Mohler, Commissioner, LAFCO Workshop 7/13/2020	15	Water and Wastewater Service Providers	Requested additional available information be included regarding the private providers, but not to the detriment of adoption in October. Do not want to go too far in the weeds though.	Content added to discussion of non public water systems in Napa County.
93	Eve Kahn, Alternate Public Commissioner, LAFCO Workshop 7/13/2020			Asked about policies regarding trucked water throughout the County, and would such a policy be relevant to a countywide agency.	Yes, a countywide agency could and should have policies regarding location and uses of trucked water sourced from its water sources. However, details and specifics of this level will need to be determined by the agencies involved in the formation of the proposed entity.
94	Diane Dillon, Vice Chair LAFCO Workshop 7/13/2020			Would a countywide agency be able to enforce use of trucked water within territory of private mutual water companies?	The countywide agency would only be able to set policy regarding use of its own water and/or member agency water. Because the countywide water agency would not be a land use authority. The County would retain that responsibility in unincorporate areas.
95	Scott Sedgley, Alternate Commissioner LAFCO Workshop 7/13/2020			Commended the Consultants on seeking out the sensitive spots in the County that need to be addressed and not just consolidations or sphere amendments. Need to start thinking long term regarding these services.	Comment acknowledged.

#	Source	Page	Location	Detailed Comments	Response
96	Margie Mohler, Commissioner, LAFCO Workshop 7/13/2020			Thanked all attendees and their thoughtful comments and noted we have many challenges ahead of us along with a comprehensive plan and wants to keep this conversation going.	Comment acknowledged.
97	Kenneth Leary, Chair LAFCO Workshop 7/13/2020			Commended the Consultants on the quality of this important study, and thanked the Commissioners and staff for their participation and implementation of this report.	Comment acknowledged.
98	Brad Wagenknecht, Commissioner LAFCO Workshop 7/13/2020			Talked about water systems and natural breaks where water is, and asked how to maintain orderly growth and succession and enforcing that in a countywide system.	The County would continue to be responsible for land use decisions, similar to in Calaveras County, which has a countywide water district (referenced in the overview portion of draft report) and several small water and wastewater systems. The District has 3 service specific SOIs to differentiate water resource management and water and wastewater operational services and limit extension of those services. Clarified on p. 51.
99	Brad Wagenknecht, Commissioner LAFCO Workshop 7/13/2020			Asked if CA Code 56133 would remain in effect for countywide water agency.	Limitations on extension of services considered growth inducing will be essential when considering the structure of the new agency. The necessity and ability of relying on 56133 to control service areas would be diminished for a countywide agency except in the case of City's that maintain their own systems; however, an option is to establish multiple service specific SOIs for one agency to define service areas. This is practiced by Calaveras County Water District. Content added on p. 51
100	Margie Mohler, Commissioner, LAFCO Workshop 7/13/2020			Talked about Yountville's water being owned by the State. Would this pose any issues to a countywide agency and would the State have to agree to join the JPA?	Structure of the JPA or countywide water agency would depend on membership; however, in the case of the example county agencies given in the report the State is not a member agency. However, in the case of a JPA (not newly formed water district), the State could be invited to participate depending on the preferences of the other interested parties.
101	Geoff Ellsworth, Mayor of St. Helena, LAFCO Workshop 7/13/2020			Important to cross-reference MSR work with County GSA/GSPAC and Napa County DCP, recognize the hydrogeological interconnectedness of surface water and groundwater. Cross pollination of these information sources will be useful to get a complete picture. Thank you very much for your efforts.	Comment acknowledged.
102	Jay Gardner, President of Meyers Water Company, LAFCO Workshop 7/13/2020			President of Meyers Water Company, serves 100 homes with unmetered water connections in Ederly Island, regulated by CPUC and Napa County Environmental Health, significant problems with system, major challenges to financing improvements, must wait for things to fail to get loan from CPUC, small water providers must adhere to same standards as large providers and it is unsustainable.	Content added to discussion of non public water systems in Napa County.
103	Bill Ross, Attorney for City of American Canyon, LAFCO Workshop 7/13/2020	71, 91, 99	Service Area, Governance Structure Options	Issue of the clarification of LAFCO-approved water service area for the City of American Canyon, which goes back to actions taken at the time of incorporation of the City, and the treatment of the former American Canyon County Water District. That clarification is essential to the desired goals and options presented for governance in the County as a whole with respect to water.	Addressing this issue through LAFCO staff and legal counsel meetings with City Manager and Attorney. Sentence added to reflect ongoing discussions and intent to solidify consensus between LAFCO and the City.
104	Dan Mufson, Ph.D., Representing Napa Vision 2050, LAFCO Workshop 7/13/2020	48		Thank you for a very comprehensive report. Propose that as we consider a countywide agency that we consider a comprehensive accounting and budgeting of water uses and resources.	A countywide water agency is proposed to be responsible for comprehensive accounting of water supply and demand in the county, and could act as a single source of information or clearing house to better leverage available resources. The lack of an existing provider of this service added to the discussion of challenges leading to the recommendation of a countywide water agency on p. 48.
105	Ron Rhyno, Resident of City of Napa LAFCO Workshop 7/13/2020			Limits to growth and what is not examined such as how water requirements for wineries and vineyards are not revealed, County should monitor water used for wine/ag and focus on water sustainability for future generations .	Comment acknowledged. A benefit of a countywide water agency could be improved coordination between agencies on these kinds of countywide water use monitoring and budgeting and potentially including water uses outside of domestic systems.

#	Source	Page	Location	Detailed Comments	Response
106	Margie Mohler, Commissioner, LAFCO Workshop 7/13/2020			Have a lot of challenges ahead of us. Need a comprehensive plan to keep conversation going. Thank you for input from the community.	Comment acknowledged.
107	Eve Kahn, Alternate Public Commissioner, LAFCO Workshop 7/13/2020			Stated she is thankful the Commission is able to see the bigger picture. Concerned in particular with trucked water and its impacts on growth and available resources.	Comment acknowledged.
108	Gregory Rodeno, Commissioner LAFCO Workshop 7/13/2020			Believes we should conceive this a unified organization, however long it takes, and with a concept of unity, of purpose and function and bring community interest to water issues with a county-wide plan and a countywide agency to implement that plan.	Comment acknowledged.
109	Kenneth Leary, Chair LAFCO Workshop 7/13/2020			Leary thanked the Consultants, staff and attendees today, and said he senses the passion and real concern about the water and about the County, and believes it is LAFCO's responsibility to collect and gather information of how the services are going to the residents and present the information in a clear and unbiased format, which he believes we did with the workshop presentation. Said where we go from here will depend not only on the elected officials, but on the people who live in the County.	Comment acknowledged.
110	Margie Mohler, Commissioner, LAFCO Regular Meeting 8/3/2020			Appreciates what LAFCO, the Consultant and Stakeholders have done to prepare a great baseline document.	Comment acknowledged.
111	Margie Mohler, Commissioner, LAFCO Regular Meeting 8/3/2020	55		Recommends having a conclusion in the report that there has been unanimous support from comments received for some kind of countywide agency.	Content added to Governance Structure options on p. 55 stating "Comments received over the course of this review have unanimously indicated support of moving forward with these efforts to form a countywide solution."
112	Diane Dillon, Vice Chair Napa LAFCO Regular Meeting 8/3/2020	339, 381		A discussion was held with the Consultant about Resort Improvement Districts (RID's) and prior 2011 MSR report analysis of reorganization as CSDs. Commissioner Dillon requested the Consultant further research this and any findings be incorporated into this MSR.	See response to comment from Diane Dillon, Vice Chair Napa LAFCO Workshop 7/13/2020. Clarification incorporated into report that previous analysis was regarding <u>community service districts</u> , and this report is proposing a <u>county service area</u> structure.
113	Diane Dillon, Vice Chair Napa LAFCO Regular Meeting 8/3/2020			Have concerns how a countywide agency would impact rates in struggling communities, such as LB and NB, where the County has gone to great lengths to ensure rates are kept at a minimum.	As noted in the MSR (e.g., see Chp. 3 Overview, Governance Structure Options, Challenges to Reorganization, pg. 51), a primary concern of the agencies reviewed in this MSR was how reorganization as a countywide agency may affect rates in each community; the first step in forming the agency is to achieve consensus of the affected agencies on this issue and several others described in the MSR. The MSR recommends that reorganization of RIDs assess financial issues, eg, the ability of the County to obtain low/no interest loans based on RID status as a disadvantaged community. As a CSA, the County supervisors would continue to serve as the board and County staff would continue to pursue options to improve the systems while minimizing rates.
114	Diane Dillon, Vice Chair Napa LAFCO Regular Meeting 8/3/2020	339, 381		Asked about process of forming a CSA.	Dissolution of an RID would be contingent on the LAFCO reorganization process, outcome of protest proceedings and resident election. A description of the process for transition was added on p. 339 and 381.
115	Kenneth Leary, Chair LAFCO Regular Meeting 8/3/2020			Agreed with Commissioner Dillon about having concise and accurate information in one place, and back stories on certain issues should be part of the discussion in the report.	Comment acknowledged. Additional background provided by agencies has been included in the corresponding sections (eg, see NRRD, Letter 6/24/2020). In other cases, eg, RIDs, County staff indicated that RID-related issues and prior feasibility analysis would be re-looked at as MSR recommendations are considered.
116	Eve Kahn, Alternate Commissioner, LAFCO Regular Meeting 8/3/2020	15	Water and Wastewater Service Providers	Agrees with Commissioner Dillon on some private water districts. Specifically, she was recently moved by Jay Gardner, from the Milton Road private water district. They are not a municipal service, so they were not included in the report, and wondered if there is any way to bring an organization like that into the	Additional content has been added to discussion of non-public water systems in Napa County.
117	Eve Kahn, Alternate Commissioner, LAFCO Regular Meeting 8/3/2020	48		Suggested Trucked Water Policy be brought into the discussion in regard to having a countywide agency.	Added content on p. 48 regarding a need for cohesive and comprehensive policies affecting both growth and water supply (i.e., trucked water policies), as an impetus for the countywide water agency.

#	Source	Page	Location	Detailed Comments	Response
118	Diane Dillon, Vice Chair Napa LAFCO Regular Meeting 8/3/2020			Expressed concern about repetition in the report and asked that repetition be minimized.	The consultants acknowledge that the report is inherently repetitive due to the nature of the requirements in the MSR and the intent of creating a report that can be broken down by chapter for each agency as a stand alone section. The format and outline of the report is based on substantial prior experience with MSRs meeting the needs of LAFCOs, stakeholders, reviewed agencies, and the public.
119	Margie Mohler, Commissioner, LAFCO Regular Meeting 8/3/2020			Repetitiveness is sometimes necessary due to different audiences. For example, an agency will often read introduction and then agency specific chapter. So there is value to some repetitiveness, due to different audiences and purposes. Reorganizing at this point does not seem feasible. Perhaps moving forward can all agree on table of contents.	Comment acknowledged.
120	Diane Dillon, Vice Chair Napa LAFCO Regular Meeting 8/3/2020			Why were sanitary surveys not included in all agency chapters, such as Yountville.	In the case of Yountville, the State of California controls the water source and provided limited information in response to repeated LAFCO and consultant requests.
121	Margie Mohler, Commissioner, LAFCO Regular Meeting 8/3/2020	6, 45, 100, 140, 144, 183, 188, 226, 229, 266, 271,		Supports the letter from City of Napa's Phil Brun about trucked water policies.	Recommendation added throughout report that the County should establish a policy for approved uses and locations of transported water to manage the use of trucked water in unincorporated areas. In addition, cities should also adopt policies to ensure cohesive water planning and growth management.
122	Margie Mohler, Commissioner, LAFCO Regular Meeting 8/3/2020			Regarding the Napa Vision comment letter, it is a great stand alone document that could be included with the report.	Comment letters and comment log will be posted separately on Napa LAFCO's website for reference.
123	Margie Mohler, Commissioner, LAFCO Regular Meeting 8/3/2020			Believe Barge letter, while it makes good points, but is outside the scope of the report.	Comment acknowledged.
124	Ryan Gregory, Alternate Commissioner, LAFCO Regular Meeting 8/3/2020			Perhaps some of the smaller governance structure options could be considered. Need to ensure that there are cost savings and efficiencies with any options considered.	Comment acknowledged. Further detailed analysis would be required before entering into a contract for services from a larger agency. Potentially this type of contract could reduce administrative costs and provide additional expertise to smaller agencies. For example, the MSR on pg. 352 identifies potential administrative cost savings that could result from a reorganization of LCWD with NapaSan. The reorganization of NBRID and LBRID as CSAs would primarily result in placing these districts under current, modern Government Code CSA law rather than outdated Resort Improvement District law.
125	Jason Holley, City Manager, City of American Canyon LAFCO Regular Meeting 8/3/2020	71, 91, 99	Service Area, Governance Structure Options	Complimented the work product, staff and the Consultant team for a process that has been under way for a year or more. Letter from City which addresses the confirmation of the service boundaries for American Canyon water service boundary. The City is working with LAFCO Counsel and LAFCO staff and expect the Final MSR will reflect the accurate historical boundaries that exist.	Addressing this issue through LAFCO staff and legal counsel meetings with City Manager and Attorney. Sentence added to reflect ongoing discussions and intent to solidify consensus between LAFCO and the City.
126	Kenneth Leary, Chair LAFCO Regular Meeting 8/3/2020			Thanked everyone for their comments. He also discussed how the comments pertaining to the report are included, and then recommended two Commissioners work together (Ad Hoc) with staff on what the final report will look like and how the recommendations and determinations will show up.	Per the Commission's directions, an Ad Hoc committee was established and met to discuss critical comments received and appropriate changes to the report and responses in the comment log.
127	Margie Mohler, Commissioner, LAFCO Regular Meeting 8/3/2020			Suggested staff and consultant put together comments of significance for the Ad Hoc Committee in order to have a focused discussion.	Per the Commission's directions, an Ad Hoc committee was established and met to discuss critical comments received and appropriate changes to the report and response in the comment log.
128	Brad Wagenknecht, Commissioner LAFCO Regular Meeting 7/13/2020			Supported the idea of a two-person committee to review comments.	Per the Commission's directions, an Ad Hoc committee was established and met to discuss critical comments received and appropriate changes to the report and response in the comment log.
129	Diane Dillon, Vice Chair Comment Letter 9/4/2020			Technical corrections.	Corrections made where appropriate.