



CALIFORNIA DEPARTMENT OF WATER RESOURCES

# SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE

901 P Street, Room 313-B | Sacramento, CA 95814 | P.O. Box 942836 | Sacramento, CA 94236-0001

November 13, 2019

Mr. Steven Lederer  
Director  
Napa County Department of Public Works  
1195 3rd St #101  
Napa, CA 94559

## **RE: Disapproval the Napa Valley Subbasin Alternative**

Dear Mr. Lederer:

The Department of Water Resources (Department) notified the County of Napa (County) on July 17, 2019 that DWR staff had not recommended approval of the Napa Valley Subbasin Alternative (Alternative). The July 17 letter described that the County could respond within 30 days to identify where information in the original Alternative submittal could be found to address specific deficiencies identified in the Department's Sustainable Groundwater Management Program Alternative Assessment Staff Report, Napa Valley Subbasin (Staff Report). The County requested, and was granted, two extensions of time to respond and ultimately provided the Department with its response letter on October 11, 2019.

Department staff reviewed the information provided in the October letter and maintained their recommendation to not approve the Alternative, as outlined in the Staff Report Addendum included as an exhibit to the attached Statement of Findings. The Department concurs with the recommendation of staff and has, therefore, not approved the Alternative.

The alternatives process represented a point-in-time opportunity for basins to submit either an existing plan that would achieve the objectives of the Sustainable Groundwater Management Act (SGMA) or an analysis of basin conditions demonstrating operation within the sustainable yield for ten years. The County selected the latter option for their alternative submittal. The definition of sustainable yield in SGMA presents a high bar – effectively requiring that none of the six undesirable results identified in SGMA were present. Demonstrating that undesirable results were absent for a ten-year period required that basins had determined those groundwater conditions representing undesirable results (or something functionally equivalent to undesirable results) and had been monitoring and managing the basin, as necessary, to ensure they were not present or did not occur.

Relatively few basins in the state could successfully claim to have been operating in a functionally-equivalent manner to SGMA for the prior ten years, sufficient to demonstrate operation within the sustainable yield as defined in statute. At the same time, there are many basins in the state taking proactive steps to manage groundwater

and surface water. Some of those basins submitted alternatives that were not successful. That outcome is not a penalty or an indictment of water management in those basins. Rather, it is a finding that those basins did not meet the specific requirements for an alternative and that they must move forward with SGMA compliance in the manner outlined in statute for the medium- and high-priority basins in California. It is the Department's opinion that Napa County is proactively managing groundwater and that the information developed for the Alternative, as well as information developed subsequent to the Alternative, leaves the County well positioned for successful and efficient implementation of SGMA through the development of a groundwater sustainability plan (GSP) for the Napa Valley Subbasin.

One outcome of the Department's determination is that a groundwater sustainability agency (GSA) will need to be formed for the Napa Valley Subbasin. The Department stands ready to provide assistance to the County in this endeavor and in development of a GSP. Information on the Department's technical, planning and financial assistance may be found on our website at <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>. Please do not hesitate to reach out to me or my staff if you have any questions about the Department's SGMA-related assistance.

Signed:

Date:



November 13, 2019

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Taryn Ravazzini  
Deputy Director, Statewide Groundwater Management

Attachment:

1. Statement of Findings Regarding the Disapproval of the Napa Valley Subbasin Alternative