



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

July 17, 2019

Mr. Scott DeLeon
Interim Water Resources Director
Lake County Watershed Protection District
255 North Forbes St.
Lakeport, CA 95453

RE: Big Valley Basin Alternative

Dear Mr. DeLeon:

The Department of Water Resources (DWR) evaluates and assesses alternatives submitted by local agencies to satisfy the objectives of the Sustainable Groundwater Management Act (SGMA) in lieu of groundwater sustainability plans as provided for by Water Code Section 10733.6. On December 30, 2016, Lake County Watershed Protection District (District) submitted an alternative pursuant to Water Code Section 10733.6(b)(1), which allows for the submittal of alternatives to groundwater sustainability plans developed pursuant to Part 2.75 (commencing with Section Water Code section 10750) or other law authorizing groundwater management. Department staff reviewed the Big Valley Basin Alternative (Alternative) and has prepared the attached Sustainable Groundwater Management Program Alternative Assessment Staff Report, Big Valley Basin (Staff Report).

The recommendation of the Staff Report is that the Department not approve the Alternative. The Staff Report did not consider and does not conclude that the Big Valley Basin is, or has been, managed unsustainably. Department staff determined that the Alternative does not contain sufficient information and data that the Department could rely on to assess whether the Alternative has resulted in or would result in sustainable groundwater management as defined in Water Code Section 10721(v).

The District has not developed a quantitative estimate of sustainable yield or established criteria related to the undesirable results defined in SGMA. It appears the District has not managed the Big Valley Basin to any objective standard, but instead claims that stable groundwater levels over time demonstrate that undesirable results associated with groundwater levels, groundwater storage, land subsidence, degradation of groundwater quality, and depletion of interconnected surface water are not present and are not likely to occur.

However, the Alternative does not contain sufficient, detailed analysis that would justify exempting the District from developing criteria for undesirable results that are essential to SGMA's definition of sustainable groundwater management. The Department staff cannot assume undesirable results are not present and are not likely to occur in the

absence of a compelling argument and sufficient and credible supporting data. Because of the limited understanding of historical and current basin conditions and insufficient information and data demonstrating the absence of undesirable results, Department staff are unable to determine whether the Alternative would lead to sustainable groundwater management for the Big Valley Basin.

If the District believes that Department staff have overlooked essential information provided by the District as part of the materials submitted by the statutory deadline of January 1, 2017, that would have material bearing on the staff recommendation, the District may identify the location of that information (e.g., document name and page number) to the Department within 30 days from the date of this letter for the Department's consideration and review. No new information will be considered; however, the Department will accept any document clearly identified in the original materials that was not submitted, if that document contains the missing information and was identified as such in the original submission. The Department will review any information submitted and render a final decision within 60 days of receiving the District's response.

The Department will review any information provided by the District and make a final decision within 90 days of this notice. All communications from the District related to this notice should be directed to Craig Altare, GSP Review Section Chief, at Craig.Altare@water.ca.gov and mailed to:

California Department of Water Resources
Attention: Sustainable Groundwater Management Office
P.O. Box 942836
Sacramento, CA 94236-0001

If the District is unable to provide the information identified above or chooses not to do so, the recommendation of the Staff Report shall become the decision of the Department and will be reflected in a final Statement of Findings. High- and medium-priority basins for which an alternative has not been approved remain subject to SGMA requirements and the corresponding statutory deadlines for GSA formation and GSP development. Information on the Department's technical, planning and financial assistance may be found on the DWR website at <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>.

Signed:

Date:



July 17, 2019

Taryn Ravazzini
Deputy Director, Statewide Groundwater Management

Attachment:
Sustainable Groundwater Management Program Alternative Assessment Staff Report,
Big Valley Basin