



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

October 3, 2019

Mr. Steve Lederer  
Director, Napa County Public Works  
1195 Third Street, Ste. 310  
Napa, CA 94559

**RE: Revised Deadline to Respond to DWR's July 17, 2019 Notification  
Letter/Staff Report on the Napa Valley Subbasin Alternative**

Dear Mr. Lederer:

This letter formalizes the final date for the County of Napa (County) to submit its response to the Department of Water Resources (Department) regarding the Department staff recommendation to not approve the Napa Valley Subbasin Alternative to a Groundwater Sustainability Plan (Alternative). The County's response must be received by the Department no later than Friday, October 11, 2019.

In a letter dated August 13, 2019, the Department granted Napa County's request for an extension to respond by September 30, 2019. Per subsequent conversations between the Department and County representatives, the Department was willing to further extend the date to respond. This was acknowledged in an email communication from the Department to Patrick Lowe, Napa County Natural Resources Conservation Program Manager, dated Friday, September 27, 2019, which noted the final deadline would be determined at a future meeting between the two parties. Although the referenced meeting has not taken place, the Department determined the new deadline could be set in the absence of that meeting.

Although the Department intends to finalize the determinations for Napa County's Alternative by mid-October, the Department may require additional time to review the County's response and make a final determination. We will continue to communicate with the County as appropriate.

Please refer to the previous communications from the Department, attached, to guide how the County should prepare its response and to ensure compliance with the statutory deadlines in the Sustainable Groundwater Management Act (SGMA).

Mr. Steve Lederer  
October 3, 2019  
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Please let me know if you have any additional questions.

Sincerely,

A handwritten signature in blue ink that reads "Taryn Ravazzini". The signature is fluid and cursive, with a small flourish at the end.

Taryn Ravazzini  
Deputy Director  
Statewide Groundwater Management

Attachments:

July 17, 2019 Notification Letter to Napa County re: Napa Valley Subbasin Alternative  
August 13, 2019 Response Letter to Napa County Request for Extension



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August 13, 2019

Mr. Ryan Gregory  
Chair, Napa County Board of Supervisors  
1195 Third Street, Ste. 310  
Napa, CA 94559

**RE: Request for Extension of Time to Respond to DWR's July 17, 2019  
Notification Letter/Staff Report on the Napa Valley Subbasin Alternative**

Dear Supervisor Gregory:

The Department of Water Resources (Department) acknowledges receipt of your letter dated August 8, 2019. In response, the Department agrees to grant Napa County's request for a 45-day extension to prepare its response to the Department regarding the Napa Valley Subbasin Alternative to a Groundwater Sustainability Plan (Alternative). The response deadline will now close on September 30, 2019.

The Department recommends Napa County prepare its response in accordance with the information requested in its notification letter dated July 17, 2019, attached. Please note that, as explained in the July 17th letter, no new information or analyses will be considered, although the Department will accept documents clearly referenced in, but not submitted with, the original materials if those documents contain the missing information and were identified as such in the original Alternative submittal.

The Department will aim to finalize its assessments of the six alternatives currently not recommended for approval, including Napa County's Alternative, by October 15, 2019, but may extend its review and finalization period for any alternative as needed. As a reminder, the deadlines for forming a groundwater sustainability agency (June 30, 2017) and submitting a groundwater sustainability plan (GSP) (January 31, 2022) are set in statute and are not altered by the submission of an alternative to a GSP. Those basins not covered by an approved alternative are strongly encouraged to take advantage of the state's range of technical, planning and financial assistance offerings intended to support local compliance with the Sustainable Groundwater Management Act (SGMA). This should be done concurrently with the Department's review and finalization of the remaining alternatives. For more information on SGMA assistance, please do not hesitate to reach out to Bill Brewster with the Department's North Central Region Office, at [Bill.Brewster@water.ca.gov](mailto:Bill.Brewster@water.ca.gov) or (916) 376-9657. Please let me

know if you have any additional questions.

Sincerely,

A handwritten signature in blue ink that reads "Taryn Ravazzini". The signature is fluid and cursive, with a distinct loop at the end of the last name.

Taryn Ravazzini  
Deputy Director  
Statewide Groundwater Management

Attachment: July 17, 2019 Notification Letter to Napa County re: Napa Valley  
Subbasin Alternative



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

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

Dear Mr. Lederer:

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 16, 2016, Napa County (County) submitted an alternative based on an analysis of basin conditions purporting to demonstrate that the Napa Subbasin had operated within its sustainable yield over a period of at least 10 years as authorized by Water Code Section 10733.6(b)(3). Department staff reviewed the Napa Valley Subbasin Alternative (Alternative) and has prepared the attached Sustainable Groundwater Management Program Alternative Assessment Staff Report, Napa Valley Subbasin (Staff Report).

The recommendation of the Staff Report is that the Department not approve the Alternative. Multiple factors contribute to the staff recommendation, but two factors are central to the outcome: the apparent lack of thresholds or other objective criteria that would have defined sustainable groundwater management practices for the subbasin, and an apparent lack of evidence that the subbasin was deliberately managed to any defined standards.

The Staff Report did not consider and does not conclude that the Napa Valley Subbasin is, or has been, managed unsustainably. The staff recommendation centers on the evaluation that the County did not establish and operate the subbasin to thresholds or objective management criteria for a period of at least 10 years prior to the adoption of SGMA and, because of that, nothing constrains the definition of "sustainable yield" for the subbasin. The Department staff found no evidence that the County had managed the subbasin within its sustainable yield over a period of at least 10 years.

Department staff understand the Alternative to state that the necessary standards were never established or used to manage the subbasin. The County set minimum thresholds for the Napa Valley Subbasin after the passage of SGMA specifically for the alternative submittal. Although alternatives based on a 10-year analysis of operating to a sustainable yield have a range of potential supporting materials that may be relied

upon to demonstrate such operations, there is a lack of evidence that the County has managed the subbasin to that or any other standard for a period of 10 years.

If the County believes that such information exists and was presented to the Department in the original submission, the County may respond within 30 days of this notice, identifying where the relevant information can be found in its documents. The deadline for alternative submissions having passed, no new information or analyses will be considered, although the Department will accept documents clearly referenced in, but not submitted with, the original materials if those documents contain the missing information and were identified as such in the Alternative. The County should provide evidence of the following:

1. That groundwater management standards consistent with the requirements of SGMA were adopted and utilized in management of the subbasin prior to and throughout the 10-year period represented by the Alternative.
2. That the County effectively monitored and successfully managed the Napa Valley Subbasin to pre-existing standards during the 10-year period represented by the Alternative.

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

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Taryn Ravazzini  
Deputy Director, Statewide Groundwater Management

Attachment:

Sustainable Groundwater Management Program Alternative Assessment Staff Report,  
Napa Valley Subbasin