



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. 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

---

Taryn Ravazzini  
Deputy Director, Statewide Groundwater Management

Attachment:

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