



A Tradition of Stewardship
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Board of Supervisors

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Ryan Gregory
Chair

August 8, 2019

Ms. Karla Nemeth
Director
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001

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

Dear Director Nemeth:

Napa County appreciates the California Department of Water Resources' (DWR's) efforts to implement the 2014 Sustainable Groundwater Management Act (SGMA) and the companion Groundwater Sustainability Plan (GSP) Regulations, adopted by the Office of Administrative Law, August 15, 2016.

To demonstrate Napa County's past and future commitment to sustainable groundwater management consistent with SGMA, the County, on behalf of stakeholders in the Napa Valley Subbasin, submitted an Alternative Plan (Alternative): *Napa Valley Groundwater Sustainability: A Basin Analysis Report for the Napa Valley Subbasin* on December 16, 2016.

DWR recently completed a review of the Alternative and provided a Notification Letter and Staff Report on July 17, 2019 summarizing the outcome of this review. The Notification Letter and associated Staff Report recommended not approving the Alternative, pending a 30-day comment period, although no judgment relating to the sustainability of the Napa Valley Subbasin was provided.

We thank you for the opportunity to meet with you, Taryn Ravazzini (DWR Deputy Director, Statewide Groundwater Management), and Craig Altare (Groundwater Sustainability Plan (GSP) Review Section Chief) on August 1 to discuss our request for an extension of the comment period duration. As was discussed during our meeting, upon adoption of SGMA, Napa County reviewed the new legislation and considered:

- The County's commitment to groundwater management since at least 1991, including the Napa Valley Subbasin, and an active role in monitoring groundwater conditions since the mid-1960s.
- The formation of the Watershed Information & Conservation Council in 2002. Comprised of 17 members, the WICC includes elected officials from the County and cities, representatives from the County's various communities, including environmental, agricultural, and other

stakeholders. WICC members represent the entire county and the watersheds including surrounding groundwater basins and subbasins in the county.

- The County's strengthened commitment to water resources sustainability and accelerated efforts towards that and other related goals since the County's 2008 General Plan update.
- Formation of the Board of Supervisors appointed 15-member Groundwater Resources Advisory Committee (GRAC) in 2011 and final recommendations in 2014, including the development of a groundwater sustainability goal and objectives before SGMA was enacted. Some members of the GRAC now serve on the WICC since completion of the three-year GRAC term.
- The County's investment in seven years (2008-2014) of technical groundwater studies preceding SGMA; these studies were aligned with the technical information now required by the GSP regulations, including the requirements for GSPs and functionally equivalent Alternatives.
- More than 50 wells comprise the monitoring network in the Napa Valley Subbasin; three wells with the longest period of record, distributed from north to south along the Napa Valley Subbasin, have exhibited stable groundwater levels for more than 50 years. Shallow depths to groundwater occur throughout most of the essentially "full" subbasin.

In light of these considerations, the County acted to develop the Napa Valley Subbasin Alternative with a focused effort conducted during 2016, consistent with and reflective of input received from DWR at that time. Key aspects and outcomes of the Alternative include the following:

- The analysis of basin conditions contained in the Alternative demonstrates that the basin has operated within its sustainable yield over a 28-year study period.
- The Napa Valley Subbasin Alternative described a study that began in fall 2016 in the Northeast Napa Area. In September 2017, Napa County completed the Northeast Napa Area: Special Groundwater Study; this served as a key supporting document and appendix to the Napa Valley Groundwater Sustainability, Northeast Napa Management Area: An Amendment to the 2016 Basin Analysis Report for the Napa Valley Subbasin (January 2018; Amendment). As explained in the December 17, 2018 letter from the County to DWR, the Amendment did not change the analysis of basin conditions or any other aspects of the Alternative. However, the availability of the Draft Sustainable Management Criteria Best Management Practices (DWR, November 2017) informed further explanation provided in the Amendment about the interpretation of the sustainability criteria and the definition of undesirable results for the basin. The Amendment was uploaded to the DWR Alternative portal on March 23, 2018.
- The absence of basin-wide adverse effects documented in the Alternative is based on the County's studies and historical reports and studies by others, including DWR's Bulletin 118 description for the Napa Valley Subbasin. This core finding of the Alternative is also consistent with DWR's recent evaluation of conditions during the April 2019 Basin Prioritization where

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the updated basin ranking showed no indication of documented impacts on groundwater within the basin or adverse impacts on local habitat and streamflow.

The landmark SGMA legislation changed how groundwater is being managed in California. The County has a multi-decadal history of prior policies and actions that align with the objectives of SGMA. The sustainable yield analysis and sustainability criteria presented in the Alternative were developed consistent with the County's understanding of SGMA objectives. As intended by the Legislature and SGMA, the County is fully committed to the monitoring, tracking, and reporting of groundwater conditions; stakeholder engagement; and management actions and projects necessary to maintain sustainable groundwater conditions in the Napa Valley Subbasin.

The County is committed to providing responses to DWR's Staff Report and Notification Letter of July 17, 2019 to provide the clarification requested and to continue the exchange of information regarding SGMA implementation for the Napa Valley Subbasin. As we discussed on August 1, the time necessary to prepare thorough responses and explanations of the County's interpretation of SGMA is likely to exceed the 30-day response period allotted in the July 17 Notification Letter. **Accordingly, we are requesting an additional 45-days to respond to DWR, for a total of 75 days from July 17, 2019.**

We acknowledge DWR's efforts to work with local agencies to further our mutual understanding of the GSP regulations and to develop Alternatives/GSPs that provide the foundation for basins to maintain or achieve sustainability. In that spirit, we appreciate your consideration of our request for an extension of the time allotted to respond to DWR's July 17, 2019 Notification Letter and Staff Report.

Regards,



Ryan Gregory
Chair, Napa County Board of Supervisors

cc:

Ms. Taryn Ravazzini
Mr. Craig Altare