



SANTA CLARA VALLEY WATER DISTRICT

NON-AGENDA

July 26, 2019

Board Policy EL-7 Communication and Support to the Board
The BAOs shall inform and support the Board in its work.

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	<u>INCOMING BOARD CORRESPONDENCE</u>
21	Board Correspondence Weekly Report: 07/25/19
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28	Email from Nancy Chace to the Board, dated 7.22.19, regarding Justice for the Survivors of the 2017 Coyote Creek Flood (C-19-0177)
31	USPS letter from Michael P. Jackson, P.E. Area Manager US Dept. of Interior Bureau of Reclamation to the Board, dated 7.12.19, regarding June Update to Allocation of Water Made Available for Contract Year 2019 – Contract No. 7.7.20-W0023 (Contract) – San Felipe Unit – Central Valley Project (CVP), California
32	Email from Walk-Bike Cupertino to the Board, dated 7.23.19, regarding Key points from the July 16 City Council Meeting (C-19-0178)
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41	Letter from Chair LeZotte to Mayer Rich Waterman, dated 7.9.19, regarding Water issues regarding the City of Campbell

CEO BULLETIN/ NEWSLETTERS



To: Board of Directors
From: Norma J. Camacho, CEO

Chief Executive Officer Bulletin Week of July 19 – July 25, 2019

Board Executive Limitation Policy EL-7:

The Board Appointed Officers shall inform and support the Board in its work. Further, a BAO shall 1) inform the Board of relevant trends, anticipated adverse media coverage, or material external and internal changes, particularly changes in the assumptions upon which any Board policy has previously been established and 2) report in a timely manner an actual or anticipated noncompliance with any policy of the Board.

Item	IN THIS ISSUE
<u>1</u>	Groundwater Management Plan Approved for Sustainable Groundwater Management Act Compliance
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Groundwater Management Plan Approved for Sustainable Groundwater Management Act Compliance

The Department of Water Resources (DWR) recently approved Valley Water's Groundwater Management Plan as an Alternative to a Groundwater Sustainability Plan, confirming it satisfies the objectives of the Sustainable Groundwater Management Act (SGMA). DWR evaluated 15 submitted alternatives in total. The 2 (two) large basins in Santa Clara County, the Santa Clara and the Llagas Subbasins, are now among the 9 (nine) basins in the state of California with approved SGMA Alternative Plans. More information on the DWR Alternative Assessments, including a detailed report for each basin, is available at <https://water.ca.gov/Programs/Groundwater%20Management/SGMA-Groundwater-Management/Alternatives>. Valley Water has also submitted a Board Non-Agenda memorandum with copies of the DWR approval letters.

With 90 years of groundwater management history, Valley Water has established comprehensive groundwater management goals, strategies, and activities to ensure sustainable groundwater supplies. DWR approval of Valley Water's Alternative is a testament to the organization's comprehensive groundwater management and ongoing commitment to groundwater sustainability.

For further information, please contact Garth Hall at (408) 630-2750.

Quarterly Water Retailer Meeting

A productive Quarterly Water Retailer Meeting was held at Valley Water on July 17, 2019. The meeting was well attended and the group received information on many issues, projects, and other efforts Valley Water is undertaking including:

- Artesian Well Conditions
- 2021 Urban Water Master Plan Projections
- Cross Valley/ Calero Pipeline Shutdown
- Water Supply Master Plan
- Los Gatos Creek listing for 303(d)
- Cyanotoxin Response Plan.

A copy of the meeting Agenda is included in the July 23, 2019, Board Agenda Packet, Item 4.1.32.

For further information, please contact Bhavani Yerrapotu at (408) 630-2735.

Revision of BAO Interpretation for Outcome Measure OM 4.1.1.c

Valley Water approved a revision of the outcome measure OM 4.1.1.c, which previously stated, "Fish tissue concentration of methyl mercury that meets Total Maximum Daily Load (TMDL) objectives (target = 1.5 nanogram (ng) total methyl mercury per liter water)." The revised Board Appointed Officer (BAO) interpretation will be, "Continued implementation and evaluation of management practices to achieve declining methylmercury in fish within impaired reservoirs in the Guadalupe Watershed." The change was needed to ensure the BAO interpretation matches the TMDL for the Guadalupe River watershed, which sets fish targets at 0.05 or 0.1 parts per million (ppm) depending on the size of the fish and a water target of 1.5 ng/L in the hypolimnion of the reservoirs. The previous outcome measure mixed up the fish and water target. While the reservoirs typically meet the water objective, the fish concentrations, while slowly decreasing in some of the reservoirs, may not be realistic to meet. The new metric clarifies the TMDL targets and allows Valley Water to show progress and recognize success on the major improvements in the reservoirs so far even if targets are not met.

For further information, please contact Lisa Bankosh at (408) 630-2618.

San Luis Delta Mendota Water Authority Tour

On Thursday, July 11, 2019, the San Luis Delta Mendota Water Authority conducted a tour of the San Luis Reservoir BF Sisk Dam and the existing Pacheco Reservoir and Dam as a part of their regularly scheduled Board Meeting. A presentation was given by staff from the United States Bureau of Reclamation (USBR) regarding a potential BF Sisk Dam raise that would be performed in conjunction with required seismic stability improvements for the existing dam. Valley Water made a presentation outlining the current status and potential benefits of the Pacheco Reservoir Expansion Project, including a brief discussion regarding its inclusion within the San Luis Low Point Improvement Project as the National Economic Development Alternative and Locally Preferred option. Members of the Water Authority, including Valley Water Directors, Kremen, Santos, and Varela, participated in an onsite tour of both proposed projects, as well as question and answer sessions.

USBR staff is planning on releasing the public draft of the San Luis Low Point Improvement Project (SLLPIP) Environmental Impact Statement (EIS)/ Environmental Impact Report (EIR) on Friday, July 26, 2019. The Pacheco Reservoir Expansion Project is currently listed within the EIS/

EIR as the locally preferred option, and the EIS/ EIR will identify potential impacts and mitigation measures for this and other alternative evaluations for the SLLPIP. The EIS/EIR will be available for public review and comment for 45 calendar days.

For further information, please contact Chris Hakes at (408) 630-3796.

Valley Water puts State Fire Prevention Requirements into Practice

In an effort to reduce the risk of vegetation and forest fires, the California Department of Forestry and Fire Protection (CAL FIRE) is stepping up their vegetation fire prevention efforts this summer. The Santa Clara Unit of CAL FIRE sends out notifications to businesses and agencies to remind them that prevention measures must be followed when engaging in hot work*, including mowing operations and using equipment with an internal combustion engine near vegetation or forested areas. Some of the required preventive measures include:

- Prohibitions against engaging in hot work operations within 24 hours of a predicted “Red Flag Event” or when weather sampling indicates that the ambient temperature has reached or exceeds 80 degrees Fahrenheit and relative humidity is at or below 30%, with wind speeds reaching 10 miles per hour or higher
- Requirements to have a round-point shovel with an overall length of 46-inches and a 5-gallon backpack water extinguisher readily accessible during hot work operations near grass, brush, or forested areas
- Yearly inspections on certain fleet vehicles, heavy equipment, and gas-powered cutting equipment to ensure that spark arresters/ exhaust systems are in good working condition

In order to comply with these CAL FIRE requirements, Valley Water’s work instruction for “Hot Work” has been revised to incorporate CAL FIRE preventive measures. Affected Valley Water staff have received training and were issued the necessary equipment to comply with the CAL FIRE requirements. For fleet vehicles, heavy equipment, and gas-powered equipment, the required spark arrestor/ exhaust inspections are integrated in with regularly scheduled maintenance activities.

*Hot Work – Any activity involving burning, welding, heat treating, grinding, thawing pipe, powder-driven fasteners, hot riveting, or similar applications producing a spark, flame, heat, explosion, or operating equipment with an internal combustion engine such as a chain saw, weed-eater, mower, off-highway vehicle, and cranes near vegetation. Equipment powered by an internal combustion engine has the potential, under certain conditions, to expel hot exhaust particles which are capable of creating an ignition source for potential fires.

For further information, please contact Tina Yoke at (408) 630-2385.

BOARD MEMBER REQUESTS & INFORMATIONAL ITEMS

Report Name: Board Member Requests

Request	Request Date	Director	BAO/Chief	Staff	Description	20 Days Due Date	Expected Completion Date	Disposition
I-19-0013	07/16/19	Varela	Yoke	Gordon	What has Valley Water planned in the event of a county-wide PG&E interruption of service, what is our contingency plan? Please advise and copy Directors.	08/05/19		

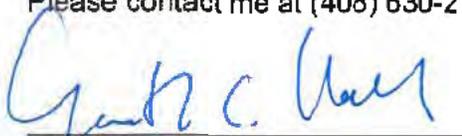
TO: Board of Directors**FROM:** Nina Hawk**SUBJECT:** Notices of Termination of Untreated Surface
Water Service Sent to Four Minimum Users**DATE:** July 19, 2019

The Surface Water Rules and Regulations (Rules),¹ approved by the Board on July 1, 1974, govern Valley Water's Untreated Surface Water Program. The Rules require permittees who are defined as Minimum Users to apply annually for a permit from Valley Water to divert surface water (Section 10.4). Each application must be accompanied with the specified annual fee (Section 11.1).

Four Minimum Users have not submitted their annual application or paid their annual fees for the past two fiscal years (FY) 2018 and FY 2019. Permit applications were mailed with prior bills, but the customers did not return an application, and their surface water accounts remain in default.

Valley Water sent letters to these four Minimum Users during the week of July 15, 2019. The letters served as formal notices of termination of untreated surface water service to these accounts due to non-payment. Following the termination of these four Minimum User accounts, Valley Water currently has 73 active surface water customers who are permitted to take water from raw water pipelines and/or creeks.

Please contact me at (408) 630-2736 with any related questions.



Nina Hawk
Chief Operating Officer
Water Utility Enterprise

cc: N. Camacho, E. Baker, B. Kassab, A. Cooper, C. Jacinto, S. Shaikh, J. Araujo

¹ A copy of the current Rules is available on Valley Water's website: <http://bit.ly/SCWDSurfaceWaterRules>



MEMORANDUM

FC 14 (02-08-18)

TO: Board of Directors

FROM: Nina Hawk

SUBJECT: State Approval of Valley Water's Alternative
for Sustainable Groundwater Management
Act Compliance

DATE: July 19, 2019

The Department of Water Resources (DWR) recently approved Valley Water's Groundwater Management Plan as an Alternative to a Groundwater Sustainability Plan, confirming it satisfies the objectives of the Sustainable Groundwater Management Act (SGMA). Attached are the approval letters received for the Alternative, which applies to both the Santa Clara and Llagas Subbasins.

DWR evaluated fifteen submitted Alternatives in total. The two primary basins in Santa Clara County, the Santa Clara and the Llagas Subbasins, are now among the nine basins in the state with approved SGMA Alternatives.

With 90 years of groundwater management history, Valley Water has established comprehensive groundwater management goals, strategies, and activities to ensure sustainable groundwater supplies. DWR approval of Valley Water's Alternative is a testament to our proactive groundwater management and ongoing commitment to groundwater sustainability.

A handwritten signature in blue ink, appearing to read "Nina Hawk".

Nina Hawk
Chief Operating Officer
Water Utility Enterprise

cc: N. Camacho, G. Hall, R. Callender, V. De La Piedra

Attachments: DWR Alternative Approval Letters for the Santa Clara and Llagas Subbasins Dated July 17, 2019



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

Ms. Vanessa De La Piedra
Santa Clara Valley Water District
5750 Almaden Expressway
San Jose, California 95118

Dear Ms. De La Piedra,

The Department of Water Resources (Department) has evaluated the alternative submitted for the Santa Clara Subbasin. Based on recommendations from the Staff Report, included as an exhibit in the attached Statement of Findings, the Department has determined that the Santa Clara Alternative satisfies the objectives of the Sustainable Groundwater Management Act (SGMA) and is approved. The Staff Report also proposes recommended actions for the consideration of the Santa Clara Valley Water District that the Department believes will enhance the Alternative and facilitate future evaluation by the Department. The recommended actions do not constitute a qualified approval of the Alternative; however, the Department encourages they be given due consideration and suggest incorporating any resulting changes to the Alternative in future updates.

As required by SGMA, the Department shall review approved alternatives to ensure they remain in compliance with the objectives of the Act. Approved alternatives are required to submit annual reports to the Department on April 1 of each year, and to resubmit the alternative by January 1 every five years. The first five-year update is due by January 1, 2022.

Please contact me at (916) 651-0870 or Craig.Altare@water.ca.gov if you have any questions related to the Department's evaluation or your implementation of the approved alternative.

Thank You,

A handwritten signature in black ink, appearing to read "Craig Altare".

Craig Altare, P.G.
Supervising Engineering Geologist

Attachments:

1. Statement of Findings Regarding the Approval of the Santa Clara Subbasin Alternative

**STATE OF CALIFORNIA
DEPARTMENT OF WATER RESOURCES**

**STATEMENT OF FINDINGS REGARDING THE
APPROVAL OF
THE SANTA CLARA SUBBASIN ALTERNATIVE**

The Department of Water Resources (Department) is required to evaluate and assess whether submitted alternatives to groundwater sustainability plans satisfy the objectives of the Sustainable Groundwater Management Act (SGMA) pursuant to Water Code Section 10733.6. This Statement of Findings explains the Department's decision regarding the alternative (Alternative) submitted by the Santa Clara Valley Water District for the Santa Clara Subbasin (No. 2-009.02). The Alternative was submitted under Water Code Section 10733.6(b)(1), which allows for the submittal of alternate plans developed pursuant to Part 2.75 (commencing with Water Code Section 10750) or other law authorizing groundwater management.

Department management has reviewed the Department staff report, entitled Sustainable Groundwater Management Program Alternative Assessment Staff Report – Santa Clara Subbasin (Staff Report), attached as Exhibit A, recommending approval of the Alternative. Based on its review of the Staff Report, Department management is satisfied that staff have conducted a thorough evaluation and assessment of the Alternative and concurs with staff's recommendation and all the recommended actions, and thus hereby approves the Alternative on the following grounds:

1. The Alternative was submitted within the statutory deadline of January 1, 2017 (Water Code Section 10733.6(c)).
2. The Alternative is within a subbasin that is in compliance with Part 2.11 (commencing with Water Code Section 10920) as required by Water Code Section 10733.6(d).
3. The Alternative has been submitted by the Santa Clara Valley Water District pursuant to Water Code Section 10733.6(b)(1) and a copy of the documents making up the groundwater management plan were submitted as required by 23 CCR Section 358.2(c)(1).
4. The Santa Clara Valley Water District explained how the elements of the Alternative are functionally equivalent to the elements of a groundwater sustainability plan required by Articles 5 and 7 of the GSP Regulations, 23 CCR Section 350 et seq., in the Groundwater Management Plan Appendix B - Demonstration of Functional Equivalency of the Alternative submitted by the District.

5. Based on Paragraphs 3 and 4 above, the Alternative is considered complete and includes the information required by SGMA and the GSP Regulations, sufficient to warrant an evaluation by the Department. 23 CCR Section 358.4(a)(3).
6. The Alternative applies to and covers the entire subbasin as required by 23 CCR Section 358.2(a) and 358.4(a)(4), respectively, and as discussed in Section IV.D of the Staff Report.
7. The Santa Clara Valley Water District has the legal authority and financial resources necessary to implement the Alternative.
8. The Department has received public comments on the Alternative and has considered them in the evaluation of the Alternative as required by 23 CCR Section 358.2(f).

Department management makes the following specific findings based on the evaluation and assessment of the Alternative prepared by Department staff:

9. The Alternative demonstrated that the Santa Clara Valley Water District has established goals and implemented projects and management actions to maintain groundwater levels, manage the subbasin to maintain a quantified level of groundwater storage, and address historical overdraft and subsidence in the Subbasin.
10. The Alternative demonstrates that the Santa Clara Valley Water District has a sufficient and reasonable understanding of the current and historical groundwater conditions related to groundwater elevations, land subsidence, surface water and groundwater interactions, water quality, and seawater intrusion in the Santa Clara Subbasin that would cause undesirable results and have a well-developed program to avoid those undesirable results by maintaining groundwater elevations above defined thresholds at index wells in the Subbasin.
11. The Santa Clara Valley Water District has demonstrated a commitment to mitigating agricultural and industrial water quality issues and seawater intrusion.
12. In light of Paragraphs 1-11 above, the Alternative satisfies the objectives of SGMA.

In addition to the grounds listed above, the Department also finds that:

1. The Alternative has demonstrated that the Subbasin will be operated within the range of historical data, sufficient to avoid undesirable results, and is consistent

with the state policy regarding the human right to water (Water Code Section 106.3) and the public trust doctrine.

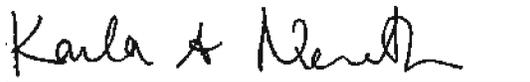
2. The evaluation and assessment of whether the Alternative submitted by the Santa Clara Valley Water District for the Santa Clara Subbasin satisfies the objectives of SGMA is a project under CEQA, but that the project is exempt from CEQA under the common sense exemption for the following reasons.

No physical change to the environment is associated with the evaluation and assessment of the alternatives undertaken by the Department. The Alternative submitted by the District is based on a Groundwater Management Plan and projects and management actions that were previously adopted and the Agency has already begun implementing.

By finding that the Alternative satisfies the objectives of SGMA, the District is authorized to continue to manage the subbasin subject to that Alternative, without the need to develop a GSP. As a result, the evaluation and assessment of the Alternative undertaken by the Department creates no foreseeable indirect impacts, and any impacts that might occur would be difficult to predict with any accuracy and too speculative to allow the Department to provide for meaningful analysis and review.

Based on the above, the Alternative submitted by the Santa Clara Valley Water District for the Santa Clara Subbasin is approved. The recommended actions in the Staff Report will assist the Department's review of the Alternative's implementation for consistency with SGMA and are thus recommended to be included in the resubmitted Alternative, due on January 1, 2022, as required by Water Code Section 10733.6(c).

Signed:



Karla Nemeth, Director

Date: July 17, 2019

Exhibit A: Sustainable Groundwater Management Program Alternative Assessment
Staff Report – Santa Clara Subbasin



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

Ms. Vanessa De La Piedra
Santa Clara Valley Water District
5750 Almaden Expressway
San Jose, California 95118

Dear Ms. De La Piedra,

The Department of Water Resources (Department) has evaluated the alternative submitted for the Llagas Subbasin. Based on recommendations from the Staff Report, included as an exhibit to the attached Statement of Findings, the Department has determined that the Llagas Alternative satisfies the objectives of the Sustainable Groundwater Management Act (SGMA) and is approved. The Staff Report also proposes recommended actions for the consideration of the Santa Clara Valley Water District that the Department believes will enhance the Alternative and facilitate future evaluation by the Department. The recommended actions do not constitute a qualified approval of the Alternative; however, the Department encourages they be given due consideration and suggest incorporating any resulting changes to the Alternative in future updates.

As required by SGMA, the Department shall review approved alternatives to ensure they remain in compliance with the objectives of the Act. Approved alternatives are required to submit annual reports to the Department on April 1 of each year, and to resubmit the alternative by January 1 every five years. The first five-year update is due by January 1, 2022.

Please contact me at (916) 651-0870 or Craig.Altare@water.ca.gov if you have any questions related to the Department's evaluation or your implementation of the approved alternative.

Thank You,

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Craig Altare, P.G.
Supervising Engineering Geologist

Attachments:

1. Statement of Findings Regarding the Approval of the Llagas Subbasin Alternative

**STATE OF CALIFORNIA
DEPARTMENT OF WATER RESOURCES**

**STATEMENT OF FINDINGS REGARDING THE
APPROVAL OF
THE LLAGAS SUBBASIN ALTERNATIVE**

The Department of Water Resources (Department) is required to evaluate and assess whether submitted alternatives to groundwater sustainability plans satisfy the objectives of the Sustainable Groundwater Management Act (SGMA) pursuant to Water Code Section 10733.6. This Statement of Findings explains the Department's decision regarding the alternative (Alternative) submitted by the Santa Clara Valley Water District for the Llagas Subbasin (No. 3-003.01). The Alternative was submitted under Water Code Section 10733.6(b)(1), which allows for the submittal of alternate plans developed pursuant to Part 2.75 (commencing with Section Water Code Section 10750) or other law authorizing groundwater management.

Department management has reviewed the Department staff report, entitled Sustainable Groundwater Management Program Alternative Assessment Staff Report – Llagas Subbasin (Staff Report), attached as Exhibit A, recommending approval of the Alternative. Based on its review of the Staff Report, Department management is satisfied that staff have conducted a thorough evaluation and assessment of the Alternative and concurs with staff's recommendation and all the recommended actions, and thus hereby approves the Alternative on the following grounds:

1. The Alternative was submitted within the statutory deadline of January 1, 2017 (Water Code Section 10733.6(c)).
2. The Alternative is within a subbasin that is in compliance with Part 2.11 (commencing with Water Code Section 10920) as required by Water Code Section 10733.6(d).
3. The Alternative has been submitted by the Santa Clara Valley Water District pursuant to Water Code Section 10733.6(b)(1) and a copy of the documents making up the groundwater management plan were submitted as required by 23 CCR Section 358.2(c)(1).
4. The Santa Clara Valley Water District explained how the elements of the Alternative are functionally equivalent to the elements of a groundwater sustainability plan required by Articles 5 and 7 of the GSP Regulations, 23 CCR Section 350 et seq., in the Groundwater Management Plan Appendix B - Demonstration of Functional Equivalency of the Alternative submitted by the District.

5. Based on Paragraphs 3 and 4 above, the Alternative is considered complete and includes the information required by SGMA and the GSP Regulations, sufficient to warrant an evaluation by the Department. 23 CCR Section 358.4(a)(3).
6. The Alternative applies to and covers the entire subbasin as required by 23 CCR Section 358.2(a) and 358.4(a)(4), respectively, and as discussed in Section IV.D of the Staff Report.
7. The Santa Clara Valley Water District has the legal authority and financial resources necessary to implement the Alternative.
8. The Department has received public comments on the Alternative and has considered them in the evaluation of the Alternative as required by 23 CCR Section 358.2(f).

Department management makes the following specific findings based on the evaluation and assessment of the Alternative prepared by Department staff:

9. The Alternative demonstrated that the Santa Clara Valley Water District has established goals and implemented projects and management actions to maintain groundwater levels, manage the subbasin to maintain a quantified level of groundwater storage, and address historical water quality issues in the Subbasin.
10. The Alternative demonstrates that the Santa Clara Valley Water District has a sufficient and reasonable understanding of the current and historical groundwater conditions related to groundwater elevations, surface water and groundwater interactions, and water quality in the Llagas Subbasin that would cause undesirable results and have a well-developed program to avoid those undesirable results by maintaining a groundwater storage range in the Subbasin.
11. The Santa Clara Valley Water District has demonstrated a commitment to mitigating agricultural water quality issues and maintaining groundwater level conditions.
12. In light of Paragraphs 1-11 above, the Alternative satisfies the objectives of SGMA.

In addition to the grounds listed above, the Department also finds that:

1. The Alternative has demonstrated that the Subbasin will be operated within the range of historical data, sufficient to avoid undesirable results, and is consistent

with the state policy regarding the human right to water (Water Code Section 106.3) and the public trust doctrine.

2. The evaluation and assessment of whether the Alternative submitted by the Santa Clara Valley Water District for the Llagas Subbasin satisfies the objectives of SGMA is a project under CEQA, but that the project is exempt from CEQA under the common sense exemption for the following reasons.

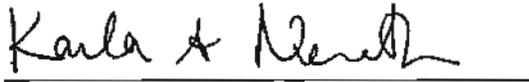
No physical change to the environment is associated with the evaluation and assessment of the alternatives undertaken by the Department. The Alternative submitted by the District is based on a Groundwater Management Plan and projects and management actions that were previously adopted and the Agency has already begun implementing.

By finding that the Alternative satisfies the objectives of SGMA, the District is authorized to continue to manage the subbasin subject to that Alternative, without the need to develop a GSP. As a result, the evaluation and assessment of the Alternative undertaken by the Department creates no foreseeable indirect impacts, and any impacts that might occur would be difficult to predict with any accuracy and too speculative to allow the Department to provide for meaningful analysis and review.

Statement of Findings
Llagas Subbasin (Basin No. 3-003.01)

Based on the above, the Alternative submitted by the Santa Clara Valley Water District for the Llagas Subbasin is approved. The recommended actions in the Staff Report will assist the Department's review of the Alternative's implementation for consistency with SGMA and are thus recommended to be included in the resubmitted Alternative, due on January 1, 2022, as required by Water Code Section 10733.6(c).

Signed:



Karla Nemeth, Director

Date: July 17, 2019

Exhibit A: Sustainable Groundwater Management Program Alternative Assessment
Staff Report – Llagas Subbasin

TO: Board of Directors

FROM: Michele King

SUBJECT Board Governance Policy Revision to
BAO Interpretation Ends Policy 4 – Outcome
Measure OM 4.1.1.c

DATE: July 22, 2019

Staff identified that the BAO Interpretation for Ends Policy Objective 4.1.1 - Preserve creeks, bay and ecosystems through environmental stewardship, Outcome Measure OM 4.1.1.c should match TMDL for the Guadalupe River watershed:

The first tissue target per the TMDL is .05 of .1ppm depending on the size of the fish and the water target is 1.5 ng in the hypolimnion of the reservoirs in the Guadalupe Watershed. While the water objective is typically met, the fish concentrations may be unrealistic to meet. There are declining fish tissue concentration trends in two reservoirs. The revised metric would allow us to show progress and recognize success on the major improvements in the reservoirs so far even if targets are not met.

Outcome Measure OM 4.1.1.c has been revised as follows to reflect this revised metric:

Prior Outcome Measure:

OM 4.1.1.c – Fish tissue concentration of methyl mercury that meets Total Maximum Daily Load (TMDL) objectives (target = 1.5ng total methyl mercury per liter water).

Revised Measure:

OM 4.1.1.c – Continued implementation and evaluation of management practices to achieve declining methylmercury in fish within impaired reservoirs in the Guadalupe Watershed.