

Date: December 30, 2023

To: April Meneghetti, Kristin Sicke

Subject: Review Comments on LSCE TM Revising Well Permit Procedure Comments

Dear April,

I appreciate that you sent out the revised 12/15/23 Luhdorff & Scalmanini Technical Memo to concerned citizens and allowing our comments. It is my belief that TM revision should have been released at the same time as the draft of the Yolo Subbasin Groundwater Agency's Well Permitting Process was finalized. It seems the two are very connected and depend on each other. The Focus Map, and the related Hydrogeologic Report (HR) are detailed in the YSGA draft document that has not been approved by their board nor had public comment, yet aspects of the content should be reflected in the County's Updated Well Permitting Procedures. So some of my comments include and reflect the YSGA recommendations.

PROCEDURE TO ADDRESS EO SECTION 4B (1): DETERMINING WELL IS NOT LIKELY TO INTERFERE WITH EXISTING WELLS

Existing wells owned by the applicant located on the same parcel as the proposed well or on a parcel adjacent to the parcel with the proposed well are exempt from the minimum well separation distance requirement. Existing wells owned by the applicant located on the same parcel as the proposed well or on a parcel adjacent to the parcel with the proposed well are exempt from the minimum well separation distance requirement.

This means that if a landowner adds a new well on an adjacent parcel, then potentially in the future splitting of the parcel, those two wells are too close if not held to the minimum separation distance. They need to hold to the minimum distances on all new wells-even with the same landowner on adjacent parcels. This second well used by the operation should be added to the projected amount of water used to the original well, and could require a HG report.

THE COUNTY REQUIRES MINIMUM WELL SEPARATION DISTANCES for ensuring proposed new wells or well alterations are unlikely to interfere with the function and operation of nearby wells. Table 1 presents these minimum required distances from nearby active wells according to the proposed well pumping capacity and proposed well location (i.e., Valley Floor areas versus Upland are meeting minimum separation distance from existing nearby well.

- 1. Table 1 of Minimum Well Separation Distances has not changed distances from the original TM, except to include a report required at 2000 gpm. I am unclear if these set back distances are appropriate or not. If a HR was not required, I would think it important before permitting any new well that the anticipated impacts to groundwater levels in neighboring wells and the anticipated impacts on groundwater levels and groundwater storage are known.*
- 2. Even though, in some cases, the current groundwater extractions appears not to be depleting the Valley Floor areas, I believe it would be prudent to reign back on huge agricultural extractions that is supporting larger acreage production allowing wells drawing 1999 gpm without a HG review. I propose that there needs to be an HR starting at 1000 gpm. 1000 gpm is absolutely adding to the disproportionate draw down on an aquifer, especially with land use changes, with potential continued drought conditions and the intention of sustainable groundwater management for the future.*
- 3. In consideration of the areas in Focus Areas where domestic wells are of high density the 2,000-foot setback distance that will help buffer around these areas of domestic water extraction should be in referenced on the Table 1 for clarity as to distances where wells are permitted.*
- 4. This TM document with the current mapping does not refer to the YSGA Focus Areas and the different requirements within these areas. The Focus Areas need to be outlined and labeled in the map.*

PROPOSED IMPLEMENTATION requiring hydrogeologist's reports for proposed new wells or alteration of existing wells if they are not exempt from the EO and fall into either of the following categories:

- Wells that are located in the upland areas that are intended to pump greater than 100 gpm.
- Wells that are located in valley floor areas that pump greater than 2,000 gpm.
- *Wells that are located within focus areas and which pump greater than 100 gpm or have a well casing diameter greater than 6 inches.*

I would think that there is potential lawsuit if a person requesting a permit sees that there needs to be a HG for 2000gpm and then gets their permit rejected because they are wanting to drill in the Focus Area and there now needs to be a HR for flows exceeding 100gpm. I would think there should be clarity on the application about the different locations-Valley Floor, Upland and Focus Areas.

New requested well permits that are located in the Focus Areas will be required to do a HR if they intend to pump 100gpm. Essentially that means every AG well will need a HR. Small farms will not be able to afford the cost of a HR, but their gpm will likely be no greater than 200gpm. I recommend changing the minimum gpm from 100gpm to 200gpm as the minimum trigger for preparing a HR in the focus areas.

Again, thank you for soliciting our comments, and listening to our concerns.

Sincerely,
Annie Main