

Date: December 31, 2023

To: April Meneghetti, Yolo County Board of Supervisors

Subject: revised well permit procedure comments

I have two major issues with the 12/15/23 Luhdorff & Scalmanini revised Technical Memo. First, there is no mention of how permits in the Focus Areas will have any different requirements than elsewhere in the County. Second, Table 1, with the minimum well separation, is almost exactly the same as the previous memo.

The revised TM uses much of the previous TM's language. In that version, there is the delineation between the Valley Floor and Upland Areas. In the revised version there is no mention nor attempt to include the Focus Areas as delineated by the YGSA's recent map. This disjointed effort leaves us questioning how the Focus Areas will be considered and protected in the well permit process.

In regards to Table 1, and the minimum well separation, this table has only one change. The arbitrary distances listed in the table is how, early this year, an agricultural well was installed within 1,200' of three newly replaced domestic wells and a number of other domestic wells in the impacted area of Plainfield Ridge. There are no hydrogeological reports showing that these distances will not impact nearby wells. There's no accounting for the cumulative affect of multiple wells in the area, the depths and screening of other well in the region, the drawdown capacity of other wells on the water table, and the cropping patterns and other water demands. Additionally, there is no mention of the 2,000' set back buffer around the Focus Areas as proposed by the YGSA.

Several other points I would like to address are listed below.

1. With new and replacement wells that require permits, there needs to be a required well construction design with any requested intervals of screens submitted with the permit. The depths and number of screens needs to be approved by YGSA.
2. New well permits need to show a map all other wells within a 2,000 radius with information on the depths, screens, and pumping capacity of each well. The map also needs to show the closest boundary of a Focus Area.
3. Requirements and recommendations from the YGSA need to be included with the permit. Only with written permission due to significant justification can these requirements and recommendations not be implemented. Failure to comply will result in the permit being revoked.
4. All new and replacement wells needing permits shall be inspected for completion and compliance with the permit before the well can be operational.
5. Until there is adequate data and water budgets established, any new well with a pumping capacity of greater than 1,000 GPM will require a hydrogeologist report.

Sincerely,
Jackie Lundy