

## April Meneghetti

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**From:** Lee Smith <lsmith@libertypistachio.com>  
**Sent:** Wednesday, December 27, 2023 12:53 PM  
**To:** April Meneghetti; Environmental Health; Denise Sagara; Garrett Driver  
**Cc:** Clerkoftheboard  
**Subject:** Public Comment for YCEH Updated Well Permitting Procedures

Attn: Yolo County Environmental Health

Please see below comments:

1. Public Comment Period: The time allowed for public comment is insufficient to receive adequate response. The County office is closed for the majority of the comment period. The structure of this comment period suggests the County is not truly interested in receiving comments but merely posting the documentation as a procedural step.
2. Replacement Well Distance: The requirement to locate a replacement well within 200 feet of the old well should be further reviewed.
  1. Subsurface conditions around an abandoned well create infrastructure risk to the new well.
  2. Most parcels are small enough that relocating the replacement well anywhere on the parcel will have no impact to the groundwater conditions.
  3. The older well may be located close to a neighboring well or domestic well. If this is the case the County should provide the option to relocate the new replacement well farther away on the same or adjacent parcel if owned by the same person or entity with common ownership.
3. Replacement Well Construction:
  1. Newer drilling and logging technology allow for more accurate placement of screens. Better screen placement has the potential to lessen localized impact to neighboring wells and nearby domestic wells. Modifications to screening intervals should be considered for replacement wells. Similarly well depth can have an impact on neighboring wells and domestic wells. Older shallow wells can be replaced with deeper wells to improve localized conditions.

These comments are submitted on my personal behalf and as a board member of the Yolo County Farm Bureau.

Regards,

Lee Smith  
Owner & CEO  
Liberty Land Management  
Liberty Orchards

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