

April Meneghetti

From: Environmental Health
Sent: Tuesday, January 2, 2024 7:45 AM
To: April Meneghetti
Subject: FW: County's Response to the Governor's Executive Order (EO) N-7-22, Scott Steward
Attachments: Yolo County EO 4B Well Permitting Procedures Update 20231215 final draft.pdf; Feb-13-2023-Executive-Order.pdf

From: Scott Steward <scott@stonestrowstrat.com>
Sent: Thursday, December 28, 2023 4:13 PM
To: Environmental Health <Environmental.Health@yolocounty.org>
Cc: Jim Provenza <Jim.Provenza@yolocounty.org>; Clerkoftheboard <clerkoftheboard@yolocounty.org>
Subject: County's Response to the Governor's Executive Order (EO) N-7-22, Scott Steward

Dear Environmental Health Staff,

Considering the comment below, the County should heed calls to postpone approval of the TM policy, if only because comment was requested between December 22nd and January 2 (when most of us are indisposed).

I documented earlier that [Yolo County small farmers and residents had good reason to be concerned](#) about successive years of lower and lower water tables, even after the wet 2022 year. The board has reviewed the Executive Order from the Governor lifting drought condition restrictions on new wells. I have reviewed the attached technical Memorandum from the County's consultant hired to keep the County in compliance with the Order.

I would ask you to support the Board of Supervisors to consider that the Technical Memorandum (TM) takes full advantage of an "or" statement in the EO and just uses the criteria of new (non-exempt) wells impact on existing wells to determine water supply health. The State criteria that I hope the Supervisors considers the EO portion:

"that groundwater extraction by the proposed well would not be inconsistent with any sustainable groundwater management program established in any applicable Groundwater Sustainability Plan adopted by that Groundwater Sustainability Agency and would not decrease the likelihood of achieving a sustainability goal for the basin covered by such a plan"

The Yolo Subbasin Groundwater Agency (YSGA) is still constructing such a plan. Neither the County's assigned YSGA or Environmental Health Department are prepared to declare damage to ground water sustainability, although, residents and farmers have real world experience of ground water depletion and sublimation.

The County should be prepared to withdraw approval of new wells and manage the draw of existing wells. It appears that the TM provides only guidance on placing wells and makes no attempt to describe potential damage from overdraft from existing wells.

At this moment in time, why doesn't the county have a ready range of acre feet that can be drawn by active wells in a given season, drought or otherwise?

Based on the overall drop in monitored level of ground water (even after a record wet year) I believe the County is risking its future instead of facing up to the inevitable conclusion that more restrictions are required.

The County could have reduced the difficulty of reaching and enforcing this conclusion by paying closer attention to the SMGA regulation that states : "To ensure sustainable outcomes, GSA boards need to expand the ability for diverse stakeholders to participate in decision making and include voting representatives from drinking water and environmental groups. State directives and full stakeholder integration is needed to balance out entrenched voting majorities and entrenched interests".

I believe the County's ground water mapping facilitator (YSGA) would welcome members of the Concerned Citizen's Group on the YSGA Board to see that a plan meets community needs.

Considering the above, the County should heed calls to postpone approval of the TM policy, if only because comment was requested between December 22nd and January 2 (when most of us are indisposed).

Sincerely, Scott Steward, Davis CA

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