

To: Yolo County Board of Supervisors

From: Ann Main Farmer, Hungry Hollow Northern Yolo County

Date: January 19, 2024

Re: REVIEW COMMENTS ON TECHNICAL MEMORANDUM TITLED
YOLO COUNTY TEMPORARY WELL PERMITTING PROCEDURES TO ADDRESS EXECUTIVE
ORDER N-3-23

Dear Honorable Supervisors,

It is my belief that TM titled Yolo County Temporary Well Permitting Procedures to Address Executive Order N3-23 revision should have been released at the same time as the Yolo Subbasin Groundwater Agency's Well Permitting Process was finalized. These two entities YCEH and the YSGA are the two permitting arms for any new well applications and both need to be clearly understood and connected as they 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 I believe that aspects of the content should be reflected in the County's Updated Well Permitting Procedures.

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. This TM document with the current mapping does not refer to the YSGA determined Focus Areas and the different requirements within these areas. I believe even though the YSGA's purpose is to determine Groundwater Sustainability with each new well application, the Focus Areas should be outlined and labeled in the Figure 1. Map.*
- 2. 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 referenced on the Table 1 for clarity as to distances where wells are permitted.*

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 those 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.*

Sincerely,
Ann Main