

**Julie Dachtler**

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**From:** linda bell <v1o@omsoft.com>  
**Sent:** Monday, April 7, 2025 3:03 PM  
**To:** Clerkoftheboard  
**Subject:** Appeal of Replacement Well Application 23-022W

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To the Yolo County Board of Supervisors

Comments on Appeal of Permit Issued for Replacement Well Application 23-022W issued 12-13-2024

In July of 2023, I sent the Board a set of comments which included the idea of when is an “existing” well, not an “existing” well. I have included this comment at the end of this message.

Today, I send these comments to say that the Replacement Well that is being discussed at your April 8th Board Meeting, is another example of when an “existing” well, is not an “existing” well. But in this situation, the “existing” well is a “replacement” well.

In your Agricultural Water Well Urgency Ordinance adopted October 22, 2024; it includes the provision: “No longer requires additional information regarding replacement wells regarding the use history and instead requires that the replacement well meet the minimum separation distances from other wells...”

I have to admit that I do not know all of the details of this particular well permit, but.....the true validity of a “minimum separation distance from other wells...” , in regards to its impact on the groundwater resources of areas such as Hungry Hollow..... is still not completely understood.

As will be presented by Annie Main in reference to agricultural well permit #23-0223W;..... the well that is being issued this “replacement” permit has not been used for decades.....therefore, its **past, and future, impacts** cannot have been truly assessed in the presently approved Yolo County GSP.

Hungry Hollow was designated as an Area of Special Concern in the Yolo Co GSP, and the western edge of the northern Hungry Hollow has shown definite declines in groundwater levels. The importance of trying to understand, and so avoid, the deleterious effects of groundwater use along the edges of groundwater basins was emphasized in the discussions leading up to the SGMA. Since the Yolo GSP was approved, special efforts have been made by the Yolo GSA to gain, and expend, funds to better understand the hydrogeology of the Hungry Hollow Focus Area.

The value of the information gathered by the already expended funds, ...and the programs set up, and planned for, to gather further formation in the Hungry Hollow Focus Area; must be fully considered before a “replacement” well.....whose potential impacts are not known.....is finally granted full approval.

The ministerial evidence presented in the Draft of your Agricultural Water Well Urgency Ordinance, pointed out the importance of the County in protecting the interests of the citizens of Yolo County. Approving a “new” well in the Hungry Hollow Focus Area could be seen as not protecting the groundwater resources of the Area.....and so the interests of surrounding Yolo County citizens.

I’m sorry for providing these comments just before the Board Meeting.

Respectfully Yours,

Linda Bell

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**When is an “existing” well, not an “existing” well**

The fact that the Water Budget Model for the 2022 Yolo GSP held constant the land use data from 2016 to 2018, means that any increase in agricultural land use and irrigation demand during this period is missing in the determination of the level of groundwater sustainability for the subbasin. The absence of the large influx in irrigation demand associated with deep wells for perennial crops between 2016 and 2018, coupled with the agricultural growth up to the present date (2023).....means that the wells drilled during the period from 2016 to 2023 are not included in the evaluation of extraction levels.

The fact that they were not included in this evaluation means that they now can not be counted as “existing” wells for which there is an understanding of their impacts on the sustainability of the subbasin or surrounding wells and substrates.

They are **NEW** wells.. Though the permit records of the YCEH may include them as “existing” wells their impacts must be evaluated before the YSGA can include them as part of a “ .....groundwater extraction .....consistent with the sustainable groundwater management program established in the YSGA Groundwater Sustainability Plan for the Subbasin; and (ii) groundwater extraction..... [which] would not decrease the likelihood of achieving a sustainability goal for the Subbasin. (From previously quoted Resolution No. 22-01)