

Julie Dachtler

From: linda bell <v1o@omsoft.com>
Sent: Sunday, August 24, 2025 6:23 PM
To: Clerkoftheboard
Subject: Concerned Citizens Urgency Moratorium - August 26 BOS meeting

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Members of the Yolo County Board of Supervisors,

I thank you for the opportunity to comment on the Concerned Citizens “Urgency Moratorium on Agricultural Groundwater Wells in Yolo County Focus Areas”

I recommend that the Yolo County Board of Supervisors approve the initiation of the Urgency Moratorium given the following DWR evaluation of the Yolo County GSP.

DWR Evaluation of the Yolo County GSP

The end of the Concerned Citizens Moratorium proposal includes a section titled “Extension Justification”. Under this section they state: “If progress is made during the initial 45 days, an extension would allow:.....“

The elements delineated in this “Extension” echo portions of DWR’s October 26, 2022 Evaluation letter sent to Kristin Sicke regarding the Sacramento Valley - Yolo Subbasin - 2022 Groundwater Sustainability Plan. (See:https://www.yologroundwater.org/files/080f9c590/Yolo_GSP2023_Determination.pdf)

I have included portions of the DWR letter (Pages 19 through 22 and 35 through 36) that directly address the Element of “Chronic Lowering of Groundwater Levels (my underlining);

“The GSP defines significant and unreasonable effects results for chronic lowering of groundwater levels as “the point at which significant and unreasonable impacts over the planning and implementation horizon, as determined by depth or elevation of groundwater, affect the reasonable use of, and access to, groundwater by overlying users.”¹⁴³ Department staff note the definition of significant and unreasonable effects is vague and circular. Simply stating avoiding conditions that are “significant and unreasonable impacts over the planning and implementation horizon” is insufficient to understand what constitutes these conditions and when they would occur. Department staff recommend the GSA clarify what significant and unreasonable effects are in the Subbasin that they are managing the Subbasin to avoid (see [Recommended Corrective Action 1a](#)).

¹³⁷ 23 CCR § 354.30 (b).
¹³⁸ 23 CCR § 354.26 (d).
¹³⁹ 23 CCR § 354.28(c)(1) *et seq.*
¹⁴⁰ Yolo Subbasin GSP, Section 3.3.1.2, pp. 281-282.
¹⁴¹ Yolo Subbasin GSP, Section 3.3.2.1, p. 282.
¹⁴² Yolo Subbasin GSP, Section 3.3.1.1, p. 281.
¹⁴³ Yolo Subbasin GSP, Section 3.3.1, p. 281.

RECOMMENDED CORRECTIVE ACTION 1

Revise the proposed sustainable management criteria for the chronic lowering of groundwater levels as follows:

- a. Clarify what significant and unreasonable effects for the chronic lowering of groundwater levels are in the Subbasin that the GSAs are managing the Subbasin to avoid.
- b. Provide additional discussion and amend the definition of undesirable results. Specifically, the GSA should explain how local exceedances within just one management area are not considered an undesirable result. Further, the GSA should clearly define a time component for when an undesirable result will occur.
- c. Describe how the selection of minimum thresholds of groundwater levels will avoid undesirable results for other sustainability indicators.

——end of quote——

Given this DWR evaluation, it is appropriate that the Yolo County Board of Supervisors recognize the need to adopt this Urgency Moratorium.

Thank you for the opportunity to comment on this proposal that will be addressed at your August 26th Board Meeting.

Respectfully yours,

Linda Bell
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