

Agricultural Well Permitting Working Group Survey Results

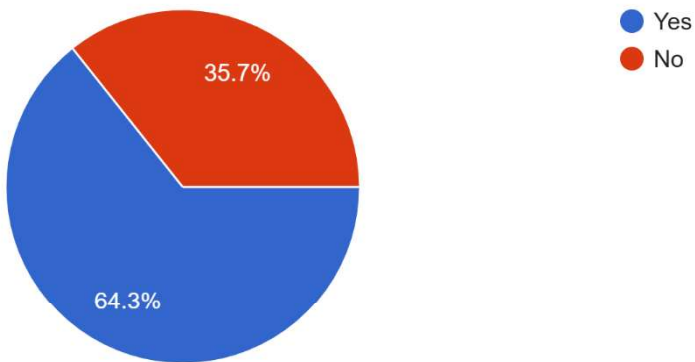
Well Meters

During the April 2 discussion, the group considered whether Yolo County Environmental Health (YCEH) should require the installation of water meters during the well permitting process. The group also discussed an alternative approach: requiring that water systems be designed to accommodate potential future installation of meters. In addition, there was discussion about which entity should be responsible for collecting and maintaining metering data.

1. Should the County require that meters be installed as part of the well permitting process?

Yes- 18

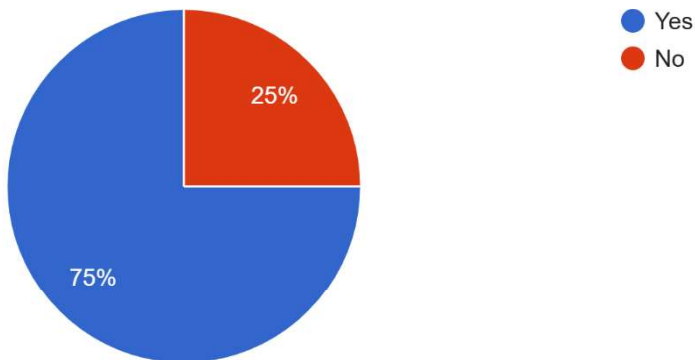
No- 10



2. If the County doesn't require a meter be installed, should the County require that the water distribution system be designed to allow for future installation of a meter?

Yes- 21

No- 7



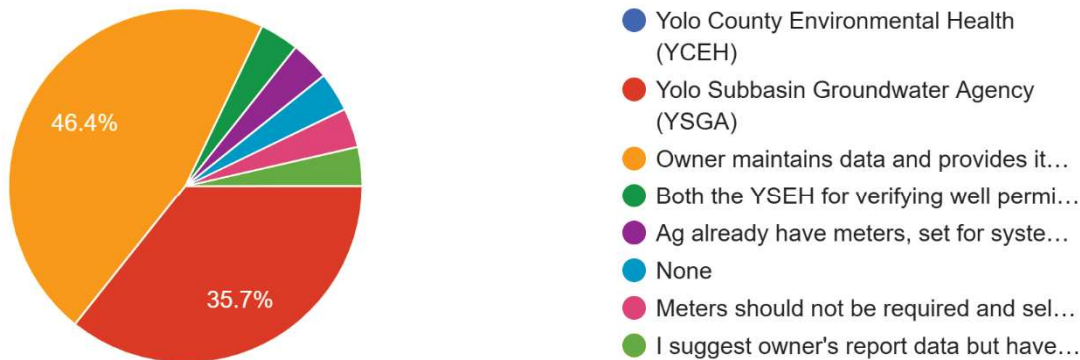
3. If meters were installed, who should be responsible for collecting and maintaining the metering data?

Owner- 13

YSGA- 10

Other- 5

YCEH-0



4. Any additional comments regarding metering?

21 responses

- Individual Metering requirements should be prescribed by YSGA in the context of subbasin wide sustainable GW management
- While meters are a very common and practical tool. I do not believe it should be a requirement for the county permitting process. That requirement should come from the GSA, and be subject to their rules.
- see comment for question 3
- We need to avoid YCEH from impeding/competing with YSGA for groundwater management. Under SGMA they can be a great help by using their land use authority to support including by ensuring permits are issued in line with YSGA's GSP
- In theory meters sound good, but there are issues with type of meter and how reliable they are, calibration requirements, actual cost of the meter, who collects the data and the cost associated with the collection and storage of the data.
- metering should be part of a demand management program
- the county should ask all landowners in the focus areas to plan to install meters to expand data collection to assess sustainable yields
- Metering is a cost to who? Information used for what? Billing for water use..NO!!
- Spot check on owner provided data should be responsibility of governing agency
- This would be the the first step, but ultimately the YSGA should be collecting data at least 2x a year, the same as spring fall water level measurements The metering process will ultimately be required for water extraction by allocation, so if we start with new wells, and begin the process of collecting data, this would be the first necessary step to that end result. But also this would

be a way to validate the initial pumping capacity of the wells and compared to the numbers stated in the well permitting process

- Unfortunately, we don't have a government office in our county that has demonstrated an acute ability to manage such a burden on the farmer. That issue needs to be fixed first. I simply don't trust anybody.
- If meters are required they should also be required on existing wells to have complete data
- It would be a huge undertaking to have an agency collect and maintain the data. I do not think it is worth the effort until it is mandated.
- I don't know enough about the proposal to answer. Domestic wells? Water consumption charges?
- Giving anyone with governmental reach data for agricultural always lends itself to negative consequences with rules put in place by individuals that make assumptions on agriculture, without truly understanding it. Our California government is already currently working to put us all out of business through overregulation.
- At our recent meeting I asked about the possibility of exemptions for smaller wells. Here are a few precedents that aren't totally analogous, but I think show that exemptions for small farmers are increasingly a part of state efforts to streamline the regulatory process. First, the California Department of Food and Agriculture Regulatory Alignment Study advised several ways that regulatory burdens should be reduced for farmers, including several recommendations specifically for small-scale farmers. For example, their "Foundational Opportunity" Recommendation #1 says (pg. 21): "While these regulatory changes are intended to improve environmental and human health outcomes, they can often place disproportionate pressures on small and historically underserved farms, particularly those with diversified operations or limited English proficiency. Many small-scale producers often lack access to technical assistance, broadband internet, funding, and other resources to help them meet evolving regulatory requirements." Second, on 4/7/26, the SWRCB adopted two resolutions that exempt groundwater users who pump 20 Acre-Feet per year or less from paying fees and doing the reporting that would otherwise have been required. SWRCB is the agency that governs subbasins in SGMA probation. The two resolutions were specifically for the Tule and Tulare Lake Subbasins. Third, in another program, the Irrigated Lands Regulatory Program, also administered by the SWRCB, the Second Statewide Agricultural Expert Panel Report was released on 3/30/26. In that document (Question 8), they describe several categories of small-scale farmers (small acreage monocultures, small acreage niche crops and small-scale diversified farms). They recommend a small-scale farmer category that would meet several criteria and would receive alternate reporting requirements which would "help focus compliance efforts where they are most impactful (page 47)." I recommend exemptions from reporting and metering for agricultural wells that are small enough to have minimal
- If its not covered in a later survey question, in conjunction with metering, the County NEEDS to require that the well completion reports are filled out correctly and completely. If the County

does not have the authority to require that state WCRs are filled out, require that a County version be completed and filed.

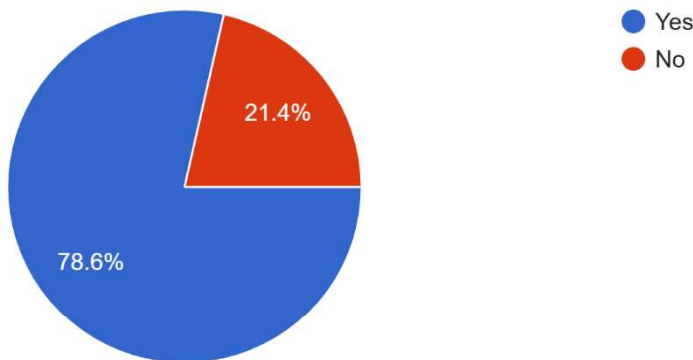
- I think meters could theoretically be an important part of a real solution but my concern is that they invite the opportunity for government agencies to create new fees and limitations based on the data they receive. The most likely scenario for a landowner is that meters only create further costs and problems. Any solution that involves metering and limitations and/or fees needs to also "reward" landowners who use less or contribute to groundwater recharge through open rangeland, ponds, etc.
- yearly reporting to YSGA to insure meter is working
- Thank you April for your time and effort on this working group!
- The well permittee should also be required to maintain the meter to the YSGA's standards.

Additional Hydrogeological Review

1. Should the County establish a list of qualified hydrogeologists through a Request for Qualifications (RFQ) process?

Yes- 22

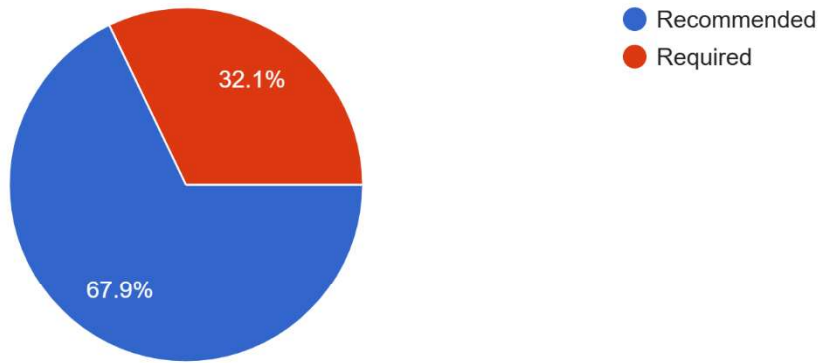
No- 6



2. If the County developed a list, should the list be a recommended list or a required list? If the list is a required list, then whenever YCEH determines that additional hydrogeological review is necessary, applicants would be limited to using only those qualified hydrogeologists included on the approved list to prepare the review.

Recommended- 19

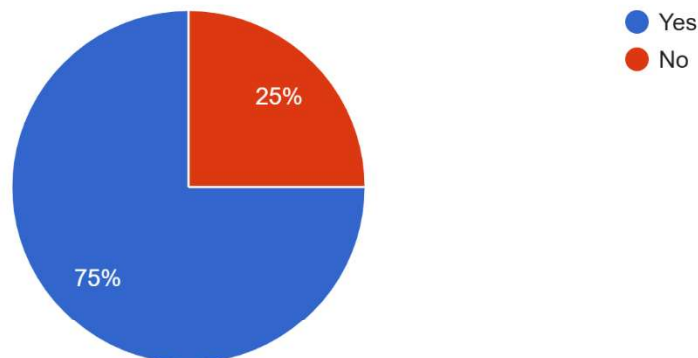
Required- 9



3. If the list is a required list, should the County have a process to add additional hydrogeologist to the list upon request? Note: there would have to be an additional fee for this request.

Yes- 21

No- 7



4. Any additional comments regarding a hydrogeologist list?

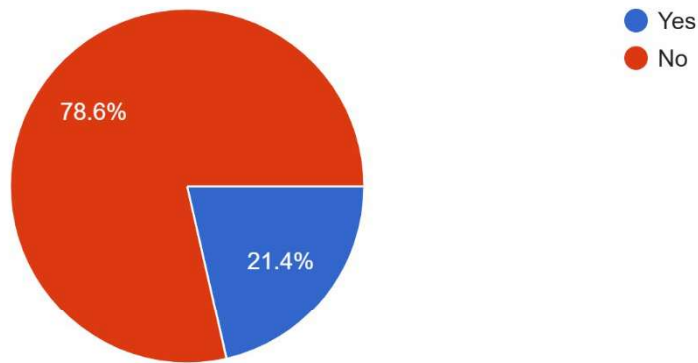
17 responses

- I'm not sure the questionnaire preparer understands how a SOQ process normally works. It is a way to ensure qualified consultants (firms) conduct the hydrogeological review. The SOQ will stand for X years (decided by the County), at which time no other firms can get on the list. In X years, the County issues a new SOQ and opens the process for firms to get on the list.
- There should not be an additional fee for the landowner providing their own hydrologist. If they are licensed they should be allowed to do the work.
- the RFQ should test the skills of the applicant by providing a case study i.e., the cobram wells to assess if these wells should have been approved.
- Permit applicants should be able to pick who ever they want to perform services.
- There should be a process by which geologist not on the original list can become part of the list. Also, as data is collected. the data should be used to help determine whether additional prospective wells in the area need a geologist report.

- The Hydrogeologist would be vetted and must use the local data appropriate for the Yolo county Wells. Ultimately, this list would also be used by the YSGA I am unsure why the County or the YSGA would have a process to add additional hydrogeologists upon request-that would mean the landowner is choosing the Hydrogeologist of their choice, which is the reason we want to move away from that system to begin with.
- More bureaucracy and red tape and expense. We are going to end up chasing our tails on this, you watch.
- The county should not require a hydrogeologist
- Have a periodic review of qualified hydrogeologists and add or subtract from the list according to a schedule rather than upon request.
- I don't know enough to answer.
- More unnecessary costs lend itself to agricultural insolvency, without price adjustments to make it work financially.
- Maybe also a process of the list is too small or if they get so busy, that they are backup up too far.
- Caveat: I did not understand the objections raised at our most recent meeting. I think Eric was saying that engineering firms would not want to be on the list for some reason? It didn't make sense to me. I would not want to see a recommendation that had downstream bad consequences. If you are convinced that it is a bad idea for some reason, so be it.
- This list of qualified hydrogeologists should not be limited to the County permit. The YSGA tier 2 process should be required to use this list of Hydrogeologists as well.
- I think its important to give landowners options. Not all scientific opinions are exactly alike and limiting the county to a select few hydrogeologists could risk creating an institutional bias.
- The permittee could potentially save money if the proposed well is located in an area where a review had been conducted in the past. The baseline info could be common to the wells.

Regulating Crop Conversions

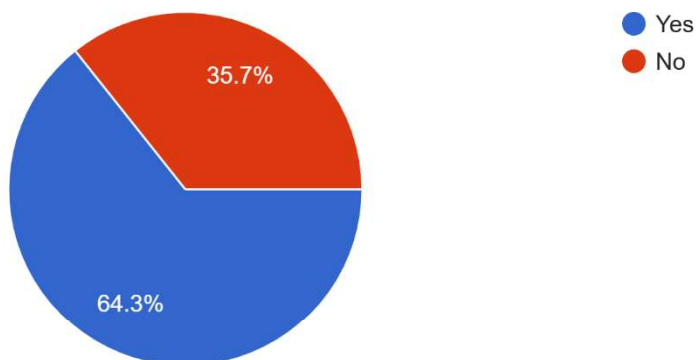
1. Should the County actively pursue updates to the General Plan and Zoning Code to regulate crop conversions?
 Yes-6
 No-22



2. Alternatively, should the County continue monitoring implementation of groundwater regulations and plan to evaluate possible changes during the next scheduled General Plan/Zoning Code update?

Yes- 18

No-10



3. Any additional comments regarding regulation of crop conversions or alternatives to crop conversions that the County should consider?

16 responses

- Any county land use regulation for purposes of GW management should be as prescribed by the YSGA with the county acting in an administrative, not technical capacity
- I think this is a good point to bring up during the next General plan review, but should be based on collected data and knowledge when that time comes.
- The YSGA is tasked through SGMA to regulate groundwater and is using a science based approach. The County is susceptible to emotional knee jerk reactions to issues and should not be telling any landowner what they can grow on their property. SGMA will provide for restrictions on groundwater extraction where appropriate in order to maintain the groundwater basin in a sustainable level which will then influence a landowner's planting

decision.. I understand that someone impacted today would feel the process is moving too slow, but SGMA requires that impacts be mitigated and the YSGA is in the process of developing protocols to mitigate those impacts.

- crop is not the metric to use to promote sustainable land policy, it should be a maximum allocation of groundwater per acre per year.
- The entire foundation of the Yolo County economy is agriculture. This seems like an extremely short-sighted and intrusive action that would have a potentially devastating impact on the local economy. It is not about the crops and farmed acreage - or restrictions, thereof - it is about how much water is extracted from the water table. The water supply/availability/cost will determine what can be grown. An allocation system of water will address the crop conversions. Strongly recommend against this and there should not be equal weighting of opinions on this matter. There seems to be a small group of people, making limited contributions to the economic activity of the area, receiving outsized representation in these matters. Water allocation NOT crop conversion!
- As needed not county wide/changes to existing land use or water use? Let Sigma handle.
- the issue is not crop conversion - it's water use.
- The General plan needs to be updated in regard to advocating that hill land be converted to higher value crops-that does not take into consideration the capacity of the land and the water resources to support that type of expansion. With landowners that do not live in the area, do not know the history of the area, come in and plant without that knowledge of capacity of the watershed, there needs to be an ordinance that protects the abuse of the land and the water, which is a common resource, needed to develop those sensitive areas. If land use ordinance is not going to be considered, there needs to be a solution to the continued expansion of non irrigated land to irrigated land-the groundwater sustainability is not being taken into consideration and continued expansion on non irrigated land will only lead to groundwater decline, especially on the western and eastern edges of the county in the focus areas. There is so much legalities for people's rights-where is the legalities for the over extraction of groundwater What would be the process for overlying pocket areas that are in groundwater decline now? The YSGA is not up and running to be able to protect this expansion that is happening faster than their data collection process- Boundary Bend has in the past ten years expanded 8000 acres of mostly historic non irrigated land into irrigated land. What will another five years, and another international or Investment Company be able to accomplish without some restrictions from our county?
- County has record of making poor decisions without proper data, like the drilling moratorium.
- SGMA was passed for this purpose. The county should just hold the line until implementation of SGMA goes into full affect.
- Crop conversion is an economic decision by the farmer. The county has no right to dictate unless they want to pay for economic loss due to opportunity loss.

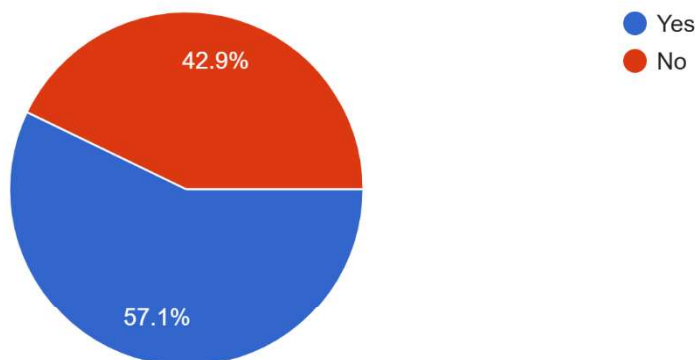
- Over 1700 acres surrounding us was concerted since we moved here. This is unsustainable.
- I do not think we should regulate CROP conversions. My concern is regarding the continued opening up previously unirrigated land to new groundwater pumping. When this happens, it results in new demand on groundwater and I think should not be allowed in areas like the Focus Areas in which we know that there are problems.
- If the YSGA cannot or will not enforce sustainable water practices in problem or focus areas throughout the county, the County should recognize the long term damage that could be caused and put into place water extraction regulation.
- I think its best to focus on what matters most - the water itself. If the goal is to regulate water, just regulate the water. Let the landowner decide what they think is feasible with the amount of water they are allowed to use. I think limiting crop conversions is a legal liability for the county that greatly complicates an issue that is really about water itself.
- My belief is the use of water should be regulated by the YCGSA. You can plant what you want, but you can only use a given amount of water.

Agricultural Well Permit Moratorium

1. Should the County consider extending the current moratorium on new agricultural wells in the existing Focus Areas?

Yes- 16

No-12



2. Any additional comments regarding moratoriums on new agricultural wells?

21 responses

- An extension of the moratorium is prudent because YSGA PMAs for the focus areas are soon forthcoming and vulnerable wells need to be protected in the interim. But delineation of the focus areas is not perfect and so there should be an appeal process for landowners to demonstrate that their particular areas should not be included

- While I have said no, I would not be opposed to a moratorium. I don't believe it has had the effect people wanted. However, I think it might have been a deterrent for other investors and people looking to develop more land. We cannot know what we cannot measure. I don't believe it is the county's place, nor do they have the right to control this, but if it does help stabilize the system and buy time for the proper authority to be established I won't disagree.
- The county should be more involved in GSA meetings and committees if they want to help here.
- The County should be working with the YSGA to help develop, modify and implement the YSGA well drilling criteria.
- Problems with the well permit process have not been addressed by our group and progress needs to be made before we go back to the same program with the same issues. We need to have a serious discussion of the well permit process and make suggestions for needed changes.
- nothing has changed since the moratorium was adopted. the same issues and conditions prevail to extend the moratorium another year.
- The moratorium on new wells has been used as a tool to try and force restriction on crop conversion or new developments. There is no basis for ongoing prevention of ag wells. Per YSGA data, the water table has been rising over the past few years and we are approaching another year of above average rainfall. This seems like a solution in search of a problem as a political tool.
- Stopping has not helped only hurt. Put conditions on permits concerning design of well.
- If county wants to extend moratorium, the moratorium area should be revised to a smaller area that reflects those areas demonstrating actual stress. Current focus area was never designed to be used for well moratorium purposes. Appropriate Ag well criteria should be developed for those areas near rural residential wells (eg depth to first screen etc), so that rural residential well impact is minimized..
- Since the YSGA is part of the well permitting process and the protector of groundwater sustainability, their role needs to be part of the process. If they do not have the data necessary to verify wells, then the well permitting process is not functioning the way the County is expecting it to and then the role of the YSGA invalid. In order for the YSGA to be a valid part of the well permitting process they need to have the ability to establish a clear, realistic schedule to: a) acquire the groundwater monitoring and water budget data needed to assess interference and sustainability impacts for Focus Areas; b) develop a legally defensible framework for issuing or withholding verification letters; and, c) Where warranted, develop a pumping allocation program that would allow new wells to be permitted with clearly communicated pumping restrictions rather than being permitted without any forward-looking constraints. The time needed by the YSGA to complete this work should be incorporated into the moratorium extension timeline. YSGA's verification

and allocation framework — can be resolved in a coordinated and mutually reinforcing manner.

- The bos screwed up this decision before by reacting politically with poor data from the flood control ground water folks. I don't trust them to make a logical educated one now.
- Unless our basin becomes critically over drafted the county should allow the YSGA do it's job.
- For highly impacted areas, there should be oversight.
- Should be permanent.
- This moratorium was done with good intentions, but has lead to unintended consequences all because a foreign owned business is not acting in good faith and does not care for local sustainability.
- I wrote “yes” but it is because the question says “consider”. Of course they should consider it, I don’t know if they should extend the moratorium however.
- I am very reticent to make this recommendation, but I don’t feel like we have a solution yet. We need to develop some sort of a timeline for the people that are hoping to drill new wells in the Focus Areas, and from the statements of the well driller who was at the last meeting, it sounds like there are potentially quite a few people “on hold” (her words) and hoping to start pumping.
- The moratorium was implemented to give stakeholders and agencies time to consider land use solutions to the groundwater overdraft in certain areas. There has been no solutions brought foreword or implemented in that time. It is irresponsible to lift it now, when no meaningful change has been made.
- Unfortunately the issue of over drafting the aquifer is real and until we can find other ways to manage it, we should probably not allow new wells in areas known to have a problem. While restricting water consumption is somewhat inevitable, I think equal effort should be put into groundwater recharge efforts. Until we untie our own hands from failed regulations on delta flow levels, we will never escape our self-imposed drought. California has the water, they just choose to send it to the ocean.
- The moratorium should be extend until the focus areas define their groundwater allocation AND Measurable Targets (Groundwater Elevations) that are protective of domestic and agricultural wells. I am worried that getting rid of the moratorium will allow individuals/companies to install wells that later may affect senior wells. I believe caution in this matter is an appropriate approach.
- There needs to be a moratorium until the YSGA has a better understanding and is willing to regulate groundwater extraction.

Additional Feedback

Are there other items you recommend County staff consider to improve the well permitting process for agricultural wells?

17 responses

- County GW management initiatives should be developed and implemented pursuant to and in coordination with YSGA initiatives. In other words, the county should follow and support the YSGA, not lead.
- I wish to thank the DEH staff and the BOS for taking this seriously, and spending so much time on this topic. I know it has been a lot of work, but I have personally learned a lot, and I hope the other attendees have as well. I believe that all groundwater issues should be resolved by the GSA. That is their purpose, and expertise. I hope the county has supported them in this. I'm aware that there are very concerning issues, and areas of concern, but we should not create policy that could hinder the rights of landowners without considering the most reasonable options first. Geoff
- yes definitely. I will be sending you a separate letter on this subject
- It is VERY important that the CEH and YSGA are on the same page.
- Continue to work with the YSGA, but not create additional bureaucratic hurdles that layer more requirements on landowners without clear benefits to the groundwater basin.
- Revisions to the permit process, start demand management planning and enact a model as part of the permit process
- please consider the cumulative impact of additional wells in the focus areas in the review process of additional wells. each well is tapping a common property aquifer and extracting at will, and at the expense of neighboring common property owners. there should be an assessment of how many wells are too many wells? gracias
- It seems that county staff have made significant efforts to improve the evaluation of ag well placement and sizing. They appear to be doing a good job.
- To many people reveiwng/ shorten time allowed to review./Let YSGA do ag permits.
- Well completion reports; verification of pumping capacity for irrigation wells. Well Pumping Capacity report (§ 2, Ord. 1579, eff. December 4, 2025) should include the required information indicated on the Well Completion Report form under “Water Level and Yield of Completed Well” (static water level, estimated yield, length of pumping test, and drawdown) at the time of well completion and before pumping begins. 2. Well drillers and well pumping contractors that work on County wells should be required to submit summary reports where wells or well pumps were replaced or extended as a result of chronically declining groundwater levels. 3. Well Spacing and restrictions to new wells-The L & S guideline of using a 500’ radius for plotting new wells is inadequate even when adding an additional 500” in focus areas. The radius should be expanded significantly based upon a more sound understanding of actual Hydrogeological conditions, and not general values for aquifer parameters that apply to the entire Yolo Groundwater Subbasin. 4. Restrictions from diverting groundwater or surface water onto non-irrigated land within the focus area from approved new wells on land that is outside the focus area. Use of surface water

should not be allowed on historic non-irrigated land within the focus area if the addition of the surface water supply will create an additional groundwater demand, such as drilling new wells, and use of those wells during 3 out of 10 limited surface water and dependency on groundwater. 5. Overlying pocket areas within the focus areas are defined areas within the focus areas with problematic water decline or subsidence. These areas would have more stringent water management requirements than the rest of the focus area. 6. Well Mitigation-A well mitigation program must to in place that includes small-scale farms that are reliant on agricultural wells

- Do not make political decisions, make logical ones with sufficient scientific data. Be FULLY TRANSPARENT.
- Conversion from agriculture is not the only threat. Proposals for data centers and detention centers can happen anytime, anywhere. Measures should be implemented to make sure they can't happen here.
- I do believe there should be a way to incentivize or force growers in the district to use some district water if they are pumping from the ground- clearly easier said than done. And yes, I have ground in the district that I farm.
- Nice work and thank you.
- One alternative to a complete moratorium, would be a limit on the amount of ag wells that can be permitted per a given amount of acres. This could either be acres owned contiguously by that landowner, or just a limit on the number of ag wells within a certain distance like a 1 mile radius. This might prevent some of the potentially over-drafting new wells from going in while still allowing large tracts of otherwise un-irrigated land to have options.
- I guess that permitting should be consulted and approved by the YSGA, including a clear definition/specification on the minimum water table depth that shall not be exceeded, as well as a list of close wells that can be affected due to the well operation and that if any negative effect on those wells is experienced, then groundwater extraction should be stopped until further investigation
- The County needs to validate the stated facts of the application. I personally know of false information being submitted in the past.