



# Santa Barbara County Farm Bureau

Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

July 14, 2017

Joan Hartmann, Chair  
Santa Barbara County Board of Supervisors  
123 East Anapamu Street  
Santa Barbara, CA 93101

Re: Water Wells Policy Direction

Dear Chair Hartmann and Members of the Board:

The mission of Santa Barbara County Farm Bureau is to represent and promote agriculture in Santa Barbara County. Water is a key resource for agriculture, which is a pillar of the County's economy and community structure.

The SBCFB Directors have concerns related to developing county-wide regulations in response to an isolated problem; role of the Sustainable Groundwater Management Act (SGMA) and its ability to consider basin-specific needs and circumstances better than a county-wide ordinance; and potential misinterpretation of well permit application rates.

**Even though the directors do not necessarily oppose requiring notification in the event of a hydrogen sulfide release but we do take issue with regulations being created in response to an isolated incident.** We further have concerns with making revisions to County Code Chapter 34A, Wells, which was carefully reviewed and revised within the past 5 years through a collaborative stakeholder process.

We are deeply concerned with requiring flow meters on new wells. SBCFB believes SGMA will be better able to respond to basin-specific needs for water extraction information instead of forcing a "one-size-fits all," countywide approach. For locations that will not fall under SGMA, we encourage localized problems to be addressed through local solutions. Flow meters are not a solution. Flow meters require proper installation, calibration, and use and raise questions regarding how they will be read, maintained, and used. **We urge the Board of Supervisors to address location-specific concerns, if needed, through local and creative solutions instead of indiscriminately requiring flow meters on all new wells.**

We are most concerned with the prospect of modifying permitting procedures to make well permits discretionary. This would have a profound detrimental impact on the agricultural community. This is another example of an issue that would be better addressed locally and comprehensively through SGMA and other local means.

We urge the Board of Supervisors to avoid employing false logic in assessing the need for policy action at this time. We find fault in the well permit application's general classification of wells for "irrigation," since it does not identify if the irrigation well is for agricultural or landscaping purposes. Well permits do not necessarily correlate to increased water usage: it is possible that applicants are seeking to create security through redundancy, compensate for aging well casings, or reduce pumping demand on a single well.

We urge you to consider these recommendations.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Russell Doty".

Russell Doty, President