



July 14, 2017

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

Re: Water Well Permits and Policy Direction, Agenda Item 2, July 18, 2017

Dear Chair Hartmann and Members of the Board:

The Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties represents over 170 growers, shippers, farm labor contractors, and supporting agribusinesses. Our members grow diverse field and nursery crops such as broccoli, strawberries, and wine grapes. These crops and the families they support rely predominately on irrigation from groundwater wells and we are committed to the responsible stewardship of water resources. Our members are very concerned about the ramifications of the potential policy options and the lasting countywide impacts on agriculture and our rural communities.

The letters from the Agricultural Advisory Committee raise important points on the impacts the policy options would have on the County's agricultural community and we ask you heed their advice on this matter. **On behalf of our members, we further urge you to not preemptively take countywide action and instead:**

- **Defer to the imminent role of the Sustainable Groundwater Management Act (SGMA)'s Groundwater Sustainability Agencies (GSAs) to address issues locally by developing and implementing Groundwater Sustainability Plans** (i.e. thoughtfully and comprehensively determine how to manage each basin's groundwater resources);
- **Refrain from developing permanent, additional regulations in County Code Chapter 34-A based on an isolated incident** (i.e. the anomaly of the hydrogen sulfide release); and
- **Address any outstanding specific needs in other areas of the County on a local basis** (i.e. if needed, work with the Montecito Water District regarding water wells on parcels that already receive municipal water service).

We adamantly oppose indiscriminately requiring flow meters and discretionary well permits throughout the County. Our County has tremendous diversity in the hydrology, geology, and socio-political context of water resources and local needs and circumstances must be considered. The need for flow meters should not be a foregone conclusion. The Courts have consistently accepted methods for estimating water use for the purposes of basin adjudication and SGMA explicitly allows discretion on monitoring groundwater extractions, including the use of any reasonable methodology instead of direct measurements. **Mandating flow meters and discretionary permitting for new wells would absolutely create additional compliance costs, delays, uncertainty, and administrative burden that would further inhibit the economic viability of our agricultural community. We urge you to defer to SGMA's GSAs and other local mechanisms to address specific needs and not take countywide action in response to an isolated incident.**

Sincerely,

Claire Wineman
President