

COUNTY OF SANTA BARBARA AGRICULTURAL ADVISORY COMMITTEE



July 12, 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:

On June 7, 2017 the Agricultural Advisory Committee (AAC) received an update from Environmental Health Services and Planning and Development regarding potential changes to the regulation of water wells. The item is currently expected to appear before the Board of Supervisors on July 18, 2017. This letter is in response to the oral comments from County Staff regarding the anticipated content of the item.

Although the complete item details were not released at the time of the AAC meeting and the Committee received a conceptual update, the Committee members shared significant concern regarding the impact of the proposed regulations on agriculture. Water is a key resource for agriculture, which is a pillar of the County's economy and community structure.

The AAC previously submitted a letter on the subject dated May 15, 2017; we have attached this letter for your reference. In our previous letter we outlined 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. Also, in addition, wells in the overlying water districts are already estimating private well use by crop. There is no need to duplicate their efforts, between the two, they work better than a county-wide ordinance, with the potential misinterpretation of well permit application rates.

The Committee does 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.

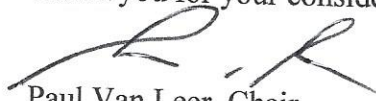
We are deeply concerned with requiring flow meters on new wells. The Committee believes SGMA will be better able to respond to basin-specific needs for water extraction information instead of forcing a "one-size-fits all," countywide approach. For locations that will not fall under SGMA, we encourage 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. Furthermore, there would be great disparity in the cost of installing flow meters and the cost would disproportionately impact agricultural users. **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 are extremely concerned with the prospective cost, delays, and justification for such a fundamental change in water policy on a countywide level.

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 and consult with the Agricultural Advisory Committee prior to initiating any policies that will impact agriculture.

Thank you for your consideration,



Paul Van Leer, Chair

Committee Members

Bradley Miles
Ron Caird
Sharyne Merritt
AJ Cisney
Randy Sharer
Wilja Happe
Claire Wineman
Paul Van Leer, Chair
June Van Wingerden
Morgan McLaughlin
Andy Mills, Vice Chair
Jason Sharrett

Representing

1st District Supervisor, Das Williams
2nd District Supervisor, Janet Wolf
3rd District Supervisor, Joan Hartmann
4th District Supervisor, Peter Adam
5th District Supervisor, Steve Lavagnino
California Women for Agriculture
Grower-Shipper Association of SB and SLO Counties
Santa Barbara County Farm Bureau
Santa Barbara Flower & Nursery Growers' Association
Santa Barbara Vintners
Santa Barbara County Cattlemen's Assn.
California Strawberry Commission

COUNTY OF SANTA BARBARA

AGRICULTURAL ADVISORY COMMITTEE



May 15, 2017

Hon. Joan Hartmann, Chair
Santa Barbara County Board of Supervisors
105 East Anapamu Street, Fourth Floor
Santa Barbara, CA 93101

RE: Discussion of Water Wells

Dear Chair Hartmann and Members of the Board:

The Agricultural Advisory Committee received a report from the Planning and Development Department Director at its May 3, 2017 meeting. We understand that Environmental Health Services in coordination with Planning and Development will initiate a discussion of potential changes in regulation or permitting of water wells at the Board of Supervisors meeting on May 16, 2017.

Although the update from Planning and Development was conceptual in nature, there was significant concern among the members of the Committee regarding the proposed regulations. Water is a key resource for agriculture, which is a pillar of the County's economy and community structure. As the committee charged with advising the Board on policies that have broad implications to agriculture, we outline the following concerns:

1. We are very concerned with developing county-wide regulations or restrictions, particularly if the regulations are being developed in response to an isolated problem. We would much rather develop targeted solutions to specific geographic or technical issues as needed.
2. The majority of groundwater basins in the County are either adjudicated or will be regulated under the Sustainable Groundwater Management Act (SGMA). The Court and SGMA have broad powers over the use and regulation of groundwater resources in their respective basins. Additional Countywide regulations would not consider needs and circumstances of individual basins and, if warranted, are better handled at a basin level.
3. Changes in permit application rates or increases in well drilling in the County should not be confused with an increase in water usage or incorrectly used as a basis for additional regulations. Farmers and landowners may have needed additional wells to maintain the same pressure and pumping levels due to recent drought conditions. Others might have wanted to have a secondary system on standby in case their primary water well source needed repair or replacement. This is particularly true due to casing damage and other drought-related impacts. This rationalization was presented to the Agricultural Advisory Committee as the basis for bringing the item to the Board for direction and is deeply flawed.

For example, in the last twenty years total water use (agricultural plus municipal) in the Santa Maria Valley Management Area reached a peak of 155,132 AF 1997 and a low of

96,765 AF in 1998. Most recently, total water use was 134,828 AF in 2014, 135,371 AF in 2015, and 122,403 AF in 2016—these levels are in fact LOWER than total water use in 5 out of 10 years in the 2000s (“2016 Annual Report of Hydrogeologic Conditions, Water Requirements, Supplies and Disposition, Santa Maria Valley Management Area,” Luhdorff and Scalmanini Consulting Engineers, April 2017).

We urge you to consult with the Agricultural Advisory Committee prior to initiating any policies that will impact agriculture.

Thank you for your consideration.

Sincerely,



Paul Van Leer, Chair

Committee Members

Bradley Miles
Ron Caird
Sharyne Merritt
A.J. Cisney
Randy Shearer
Wilja Happe
Claire Wineman
Paul Van Leer
June Van Wingerden
Morgan McLaughlin
Andy Mills
Jason Sharrett

Representing

1st District Supervisor, Das Williams
2nd District Supervisor, Janet Wolf
3rd District Supervisor, Joan Hartmann
4th District Supervisor, Peter Adam
5th District Supervisor, Steve Lavagnino
California Women for Agriculture
Grower-Shipper Vegetable Association
Santa Barbara County Farm Bureau
Santa Barbara Flower & Nursery Growers' Association
Santa Barbara Vintners
Santa Barbara County Cattlemen's Assn.
California Strawberry Commission