

ATTACHMENT C Public Health Department of Mendocino County

Healthy People, Healthy Communities



Environmental Health

Ukiah Office 860 N. Bush St. Ukiah, CA 95482 Phone: 707-234-6625 Fort Bragg Office 120 W. Fir St. Fort Bragg, CA 95437 Phone: 707-961-2714

Date: February 3, 2025

To: Director Krog, PBS

From: Marlayna Duley, EH

Subject: Draft Water Hauling Ordinance Comments

The primary concern with this ordinance is that it depends on qualified staff to implement the new program, a responsibility that should fall under the purview of a Water Agency. The County lacks a Hydrologist, and Registered Environmental Health Specialists (REHS) are not licensed hydrologists. Environmental Health (EH) has significant reservations about the County imposing limits on the volume of water that purveyors can sell, as EH does not possess the regulatory authority to do so. EH does not support any regulations that would mandate County monitoring or require meters on privately-owned water wells. The department also lacks the necessary staff and funding to manage the increased workload this program would entail. Ultimately, EH does not have the technical expertise or regulatory authority to oversee this proposal and cannot operate as a de facto Water Agency as suggested in the draft ordinance.