

April 16, 2021

James Sullivan, Geologist (semi-retired)
10475 Hills Road
Mendocino, CA 95460

Mendocino County Supervisors:
Glenn McGourty, Ted Williams, Maureen Mulheren, John Haschak, Dan Djerde
501 Low Gap Road
Ukiah, CA 95482

Re: April 19, 2021 Meeting/Cultivation of Cannabis in Range Land

Dear Supervisors:

Please know that as the Board of 5 elected officials you all in part have a duty to be the protectors and guardians of our land and resources of Mendocino County. Based upon the increased reliance of our finite supply of surface and groundwater resources alone I strongly encourage you not adopt the proposed Cannabis Land use Ordinance as proposed.

I have recently participated in the ongoing planning process related to the Ukiah Valley Basin Groundwater Sustainability Agency's (UVBGSA) development of their Groundwater Sustainability Plan (GSP); becoming involving in both the Technical Advisory Committee and attending (virtually) monthly UVBGSA update meetings. It has become very clear to me, as a groundwater professional with over 25 years of applied experience, that the water resources (both surface water and groundwater) are stressed yearly in the Ukiah Valley Basin. Going forward the protection of Mendocino County's water resources, and careful planning of beneficial uses of water resources is essential for a healthy/thriving economy.

Water use practices in the cultivation of legal Cannabis have evolved from illegal Cannabis cultivation, though not as water intensive as illegal cannabis cultivation, each legal operation is different in almost every aspect. Even for equal sizes of physical area it is not a one shoe fits all for water use from one cannabis operation to the next. In addition, the lack of data and the enduring problem of water scarcity are problematic for any increase in cultivated land, let alone cannabis cultivation. Likewise, the scale at which the Cannabis industry could reach within Mendocino County could very easily outweigh water efficiencies without data and well-tailored regulatory polices to protect our limited water resources.

Therefore, I ask you not to adopt the proposed Cannabis Land Use Ordinance. In addition, at a minimum any expansion of cannabis cultivation in Mendocino County must be preceded by a countywide Environmental Impact Report, which includes assessing the impacts to water resources (groundwater and surface waters).

Best Regards,


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