

Dear Supervisors,

When you consider your vote on this proposed ordinance, please substitute “Eel and Russian River Watersheds” for “Rangelands” . They are the source of water, essential for life, to many, many people in Mendocino County, people who rely upon you for sound governance.

I served as Manager/General Counsel for the Mendocino County Water Agency and as Executive Secretary for the Eel-Russian River Commission. Therefore, I am particularly concerned that increased cultivation in these watersheds poses a dual threat to the quality and the quantity of that water supply. DEMAND and DAMAGE are the perils.

Already, it would seem from comments, the current demand is having a negative impact on surface and groundwater. Please bear in mind a saying of the water bar—“I’d rather be upstream with a shovel than downstream with a water right”—as you evaluate enforcement.

Quality of surface water never gets better than at the headwaters. Quality of groundwater is difficult and costly to remediate, if possible.

Whenever the ground is disturbed on slopes in a watershed, be it leveling, terracing, roads, buildings, etc., the surface and sub-surface flow of water is damaged. Those flows feed creeks after rains cease and refill groundwater. **The magnitude of the change depends upon the magnitude of the disturbance.**

**Essentially, these interceptions increase** peak flow leading to erosion and less time for the water to filter down into the earth.

All of these watered processes are best evaluated from a watershed prospective, i.e., a true CEQA evaluation. Only that, I believe, can truly evaluate the cumulative effect of many changes—a million small slices.

I am concerned about relegating any CEQA evaluation to the piecemeal, use permit process. The county’s proclivity for mitigated neg-decs with no follow up on whether the mitigations ever happens is disturbing. Does anyone remember the General Plan, adopted in the 80’s, under duress, that had as one of its mitigations, a grading ordinance—partially adopted deeds later. When was the last time the County declined to approve something based on CEQA? Why should protection of this vital resource devolve upon a few activists?

If our water doesn't merit a full CEQA review, I don't know what does. You are currently considering handing over control of some portion of our watersheds to persons unknown without understanding what this truly means for those who live here.

I understand that you have many forces converging upon you, not the least of which, to your minds, is escaping CEQA. What if CEQA, properly employed, could be of benefit to your care--citizens, voters, residents —I don't know which are your 'heart' people.

If you don't address water through CEQA, when and how will you address it? How are you going to assure residents that they have your back for good water?

Sincerely,  
Linda Hager Bailey