

County of Mendocino Planning Commission  
501 Low Gap Rd.  
Ukiah, CA 95482  
**pbs@mendocinocounty.org**

Subject: MS-2019-0003  
May 10, 2021

Dear Chair Purnell and Commissioners:

I listened to full deliberations from your 5/6/21 meeting this weekend. I am following the Cannabis issue and appreciated your thoughtful review of this coastal lot subdivision, when you knew you had a huge item next in line.

To be clear, I do not have any advocacy on this project, and only watched it because Cannabis was on the Agenda. However, using a 30-year old Hydrologic Study for a current project certainly caught my ear. As the former Hydrologist for the Mendocino County Water Agency, I felt an obligation to provide you with additional information. I used to review Hydrological Studies for the Department of Environmental Health. Hydrological studies range from Grade A to Grade F. As a 3<sup>rd</sup> party review, my duty was to ensure that the Study conformed with the Mendocino County Coastal Groundwater Development Guidelines (CGDG).

Pumping time requirements for Hydrological Studies range from 17 to 72 hours. Most coastal wells are set in terrace and/or bedrock and have a minimum 24-hour test period. A 17-hour test was only allowed in a confirmed alluvial deposit well and must have prior authorization from the Department of Environmental Health to conduct such a short test. Was an alluvial well confirmed and prior authorization obtained? Was the test performed according to the CGDG?

The hydrologic consultant mentioned that current well depths were substantially similar to 1991. Were the well measurements taken at the same time of year? Hydrological studies are conducted in the early fall, at the driest time of year, and it is important that comparative months be used. What time of day were the measurements taken and in how many wells? Readings at 2 A.M. can be considerably different from readings at 2 P.M. Was it a single point in time reading or was a recording logger used for weeks or months?

While the immediate neighborhood may not have changed, changes in the groundwater basin over the past 30-years may be significant.

- What is the percent change in impervious area in the groundwater basin (GB) since the study was conducted?
- How many new wells were drilled in the GB?
- Has land use changed in the GB? (including gardening, hydroponics, cannabis, commercial activity)
- How many second residential units have been built in the GB?
- How extensive is illegal water use in the GB?
- How have the above conditions changed in the directly adjacent groundwater basins?

Depending upon the answers to the above questions, using a 30-year old Hydrological Study as proof-of-water in a current project, may be very problematic.

Sincerely,  
Dennis Slota