



# City of Santa Fe Water

## Memorandum



**DATE:** October 4, 2021

**TO:** Jarel LaPan Hill, City Manager

**VIA:** Jason Kluck, Land Use Department Director

*Jason M. Kluck*  
Jason M. Kluck (Oct 7, 2021 08:59 MDT)

Shannon Jones, Public Utilities Department Director

*Shannon Jones*

Marcos Martinez, Assistant City Attorney

*Marcos Martinez*  
Marcos Martinez (Oct 7, 2021 08:35 MDT)

**FROM:** Jesse Roach, Water Division Director

---

### ITEM AND ISSUE:

Determination of Development Water Budgets for Commercial Cannabis Production

### BACKGROUND AND SUMMARY:

According to City of Santa Fe Resolution Number 2010-20 titled 'A Resolution Adopting Administrative Procedures for Water Demand Offset Requirements', "Up-dates and modifications to the Administrative Procedures for Water Demand Offset Requirements may be approved by the Public Utility Department Director and the Land Use Department Director except that modification of fees associated with the implementation of the city code requires approval by the Governing Body."

There is not currently a category in the City's Water Offset Requirement Fee Chart (accessible here: <https://www.santafenm.gov/development-water-budgets>) specific to cannabis production, and comparison of the existing category "Indoor Nursery" to potential cannabis use suggests the need for a cannabis specific water demand method.

Cannabis production permits in New Mexico are based on number of mature plants. According to literature (<https://www.nature.com/articles/d41586-019-02526-3>), water requirements per cannabis plant range from about 0.5 to nearly 6 gallons per plant per day. City Code does not provide recourse to the Water Division to audit and adjust Development Water Budgets developed based on the Water Offset Requirement Fee Chart, and therefore it is Staff's recommendation that a conservative water use value of 6 gallons per plant per day, and a 365 day annual growing season be selected for inclusion in the Fee Chart. Growers who feel that they can produce cannabis with less water can submit an Alternative Water Budget. This will allow water efficient growers to estimate their water use and the Water Division to audit and adjust their Alternative Water Budgets based on actual usage once that data is available. This conservative water use value will also protect the Water Division from less water efficient growers that may opt for the standard budget.

### ACTION REQUESTED:

The Public Utilities and Land Use Departments request your review and approval of a Development Water Budget of 6 gallons per plant per day for 365 days per year for commercial cannabis growers be included in the Water Offset Requirement Fee Chart.