

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

August 10, 2020

Stanley E. Speer Chief Financial Officer Cadiz Inc. 550 South Hope Street Suite 2850 Los Angeles, California 90071

Re: Cadiz Inc.

Registration Statement on Form S-3

Filed August 3, 2020 File No. 333-240284

Dear Mr. Speer:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Irene Barberena-Meissner, Staff Attorney, at 202-551-6548 with any questions.

Sincerely,

Division of Corporation Finance Office of Energy & Transportation

cc: Kevin Friedmann, Esq.