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☐ Reg/NPS ☐ Cleanups ☐
☐ Date

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
777 Sonoma Avenue, Room 325
Santa Rosa, California 95404

June 5, 2015

Matthew St. John
Executive Officer
North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, California 95403

Dear Mr. St. John:

This letter is in response to the California Regional Water Quality Control Board, North Coast Region's (Regional Water Board) April 22, 2015, Notice of Intent and request for comments regarding their draft Waiver of Waste Discharge Requirements, General Water Quality Certification for Discharges of Waste resulting from Marijuana Cultivation and Associated Activities, or Operations with Similar Environmental Effects in the North Coast Region (draft order). NOAA's National Marine Fisheries Service (NMFS) shares the Regional Water Board's concern that unpermitted and unregulated marijuana cultivation is degrading water quality and harming salmon/steelhead in many northern California streams and rivers, and applauds the effort to address these concerns through their waste discharge permitting process. What follow are NMFS's comments on the draft order and associated documents.

General Comments

NMFS shares the Regional Water Board's concern that the unregulated land clearing and marijuana grow-site development currently taking place is likely introducing pollutants (such as sediment, fertilizer, pesticides, and fuel) into North Coast streams and rivers. However, an equal, if not greater, concern is the illegal and unpermitted pumping of surface water that inevitably accompanies most grow site-development. During our ongoing multi-year drought, the impact of these illegal surface diversions on aquatic species, including federally threatened salmon and steelhead, has been extensive. Every summer, a growing number of streams already impacted by the drought are dewatered further by diversions supplying marijuana gardens, often to the point of completely drying the stream bed (Bauer *et al.* 2015). While preventing pollutant delivery into streams and rivers is a laudable and necessary endeavor, water quality benefits to salmonids are unrealized if there are no remaining individuals in the stream to benefit. NMFS is aware water rights are under the jurisdiction of the State Water Board, and that the Regional Water Board does not have the ability to grant or make changes to any water right or permit. However, as referenced in your draft order, state legislation clearly intended to "combine the water rights and water quality functions of state government to provide for consideration of

water pollution and water quality, and availability of unappropriated water whenever applications for appropriation of water are granted or waste discharge requirements or water quality objectives are established (page 5 of the draft order)." In that regard, NMFS encourages the State Water Board and Regional Water Board to work in concert on this issue to ensure that adequate flows to maintain aquatic life and hydrologic function result through any permitting or enforcement action the state may take with regard to waste discharges from marijuana cultivation.

Specific Comments

Draft Order

Bottom of page 4, #15: Please ensure that any entity qualifying for the discharge waiver program fully complies with existing California state law, especially the California Water Code and Fish and Game Code.

Bottom of page 5, #17: The acceptable ground slope qualifying for the "low impact" Tier 1 designation appears high (up to 35% slope). For instance, to qualify as a low impact vineyard development (referred to as "Level 1") within Sonoma County, vineyard development cannot take place on natural slopes greater than 10% in areas with highly erodible soils; if erodible soils are absent, the maximum slope is 15% (Sonoma County 2013). Please explain the scientific reasoning why the Regional Water Board's slope criterion for marijuana cultivation differs so markedly from similar local regulations and why this would be protective in many watersheds already identified as sediment impaired in Total Maximum Daily Load analyses conducted by the Regional Water Board and the U.S Environmental Protection Agency. NMFS recommends the slope requirement for Tier 1 inclusion be reduced to a more reasonable criterion such as less than or equal to a 15% slope. Also, please clarify if the 2,000 square foot cultivation area limitation refers to just one site per property or parcel, or if an applicant can have several disconnected grow sites, each under 2,000 square feet, and still qualify as a Tier 1 project.

Top of page 10, #30: The first sentence states *"The General Water Quality Certification contained in this Order shall not apply to activities that will 1) take place within the channels and/or banks of a watercourse containing fish and/or that supplies water for a domestic water source"*, which would appear to exclude most operators within the rural North Coast area where (1) salmon/steelhead inhabit most streams, and (2) many landowners use surface water for their domestic water source. Further clarification on this point would be helpful, as would a formal definition of what constitutes the "banks of a watercourse" (*i.e.,* is it up to the ordinary high-water mark, some linear distance from the wetted edge, *etc.*).

Page 14, #3a: NMFS recommends that the Regional Water Board structure this permit requirement such that streamside buffers adhere to the widest length when more generous buffer regulations already exist (*e.g.*, Sonoma County Riparian Ordinance). Maintaining existing riparian buffers are critically important for achieving water quality objectives as well as protecting and recovering listed salmon and steelhead populations.

Page 15, #5c: NMFS recommends that offstream water storage development be required for all tiers of dischargers in order to protect current beneficial uses (of which marijuana cultivation

may not be). Anyone with a need to draft surface water (or pump hydrologically connected groundwater) during summer months should be required to utilize offstream storage capable of meeting their irrigation need for the entire season. Properties that otherwise meet Tier 1 requirements should be given a set period of five years (one permit cycle) to develop off-stream storage.

Page 18, #7: NMFS urges the Regional Water Board to adopt an empirical, objective flow criteria representing a minimum flow level necessary to keep fish and other aquatic life in good condition (the Water Resource Protection plan currently contains a placeholder for such criteria). Furthermore, prohibiting water diversions after May 15 may be too late to protect outmigrating steelhead kelts, especially during a dry spring such as the one we are currently experiencing. Establishing the date as May 1 would better protect adult steelhead under those circumstances.

Appendix A, Water Resources Protection Plan:
Roads and Graded Areas; Site Maintenance, Erosion Control & Drainage Features: How does a general one acre threshold for cleared area translate to adequate minimization of erosion potential (*i.e.,* why not the 2,000 square feet found in the draft order)?

Riparian & Wetland Protection & Maintenance: The third question relates to determining whether riparian areas and wetlands "… *maintain functionality, temperature, filtration of sediment/pollutants, nutrient cycling, woody debris, groundwater recharge, bank stabilization, etc.*" Requiring a layperson to determine if these complex natural processes are functioning properly and adequately protected may not be appropriate. Instead, Regional Water Board staff (or some other qualified scientist) should determine the answers to the above questions.

NMFS appreciates the hard work of the Regional Water Board staff as they try to minimize water quality degradation resulting from outdoor marijuana cultivation. If you have any questions concerning this letter, please contact Rick Rogers of my staff at (707) 578-8552 or rick.rogers@noaa.gov.

Sincerely,

Alecia Van Atta
Acting Assistant Regional Administrator
California Coastal Office

cc: State Water Resource Control Board. Division of Water Rights
Eric Larson, California Department of Fish and Wildlife

Literature Cited

Bauer, S., J. Olson, A. Cockrill, M. van Hattem, L. Miller, and M. Tauzer. 2015. Impacts of Surface Water Diversions for Marijuana Cultivation on Aquatic Habitat in Four Northwestern California Watersheds. PLoS ONE 10(3).

Sonoma County Agricultural Commissioner. 2012. Grading, Drainage, & Vineyard & Orchard Site Development Ordinance – Chapter 11 of the Sonoma County Code as Adopted by the Board of Supervisors on May 15, 2012, effective on June 14, 2012. Copy can be found at: http://www.sonoma-county.org/agcomm/vesco.htm.

From: Gueren White [redacted]
Sent: Wednesday, June 10, 2015 2:35 PM
To: NorthCoast
Subject: public comment regarding cannabis draft order

Public Comment:

Hello, I am an environmentalist, a small medicinal cannabis farmer, a land-owner in humboldt county and I studied forest ecology at HSU. I have lived in Humboldt county for 15 years and I have a lot of experience with growing cannabis, ecology, and I am familiar with the rural community of humboldt county.

I am a supporter of the regulations that the state water board is proposing. I want to see the rivers and creeks flow clean and clear throughout the summer. I also want to see this regulatory project succeed. In order for it to succeed, we are going to need cooperation from the farmers, so my comments here are geared towards making the regulations realistic and achievable so that people will want to register for your permit.

I will go in the order that your draft was written.

In the overview section it identifies cannabis as posing a threat to water quality.
I think cannabis does pose a threat but to a lesser extent than other industries like cattle, logging and mining. It should be regulated consistently with the idea that it is less impactful than other industries like logging, mining and cattle.
In section 5, it identifies sediment and erosion from roads as one of the main problems. I think logging roads and forest service roads are a higher threat than cannabis farms in this regard. What is being done to fix up all the old logging roads? There are numerous forest service roads that are not being maintained to these standards. We need to open a dialogue with the forest service to fix up all the roads in northern california if we are to succeed. Many private properties that will be registering for this permit are surrounded by forest service roads that need to be improved. Also, many small cannabis farmers will not be able to afford fixing up the roads on their property. If we could get financial assistance to the small farmers to fix up their roads, and get the forest service on board, this program would be much more effective. There could be an incentive program where if you meet most of the standard conditions and are trying to get to tier one, and you voluntarily register, you get some financial assistance with fixing up roads, and possibly purchasing water tanks, which are also expensive.

Aslo, in section 5 it identifies over allocation of water. I am aware that some huge grows do use too much water, or in some areas there are too many grows on one stream. However, I think the cattle industry uses more water and even sprinklers watering lawns and vegetable farms use more water than a 50 plant cannabis farm that uses drip irrigation. In my watershed I use about 10 gallons per plant every other day on 50 plants. That equals 250 gallons a day. I also use about 200 gallons a day in the house and on vegetable gardens. I know that I am using less than 10 percent of the stream that flows through my property. That same stream flows into a larger stream and the cattle rancher uses more than 90 percent of the larger stream to water his grass with sprinklers! He should be forced to use drip irrigation and conserve water, because he is the one over allocating the water resource, not me. He uses 500 gallons every few minutes , while I use 500 gallons a day. Not to mention the broadcasting of chemical fertilizers on huge grass fields near the river which is much more impactful in terms of nitrogen in the river than using compost and organic gardening methods on 50 cannabis plants further from the river.

If you want people to voluntarily cooperate with this order I think ceasing surface water collection by May 15th is unrealistic. Could this be moved to August 1st? At least July 1st. The further back you can push this, the more people will be able to comply.Why should people be allowed to water there lawns with a sprinkler and small cannabis farmers are being forced to store there water from May 15 until October? If I had to store water from May 15th, I would need 66,000 gallons of water storage. I don't even have space for this much water storage. These systems are very expensive, and I would not be able to afford it. I would have to grow more plants to raise enough money to afford this, which would mean I would need to use more water and have a larger impact on my watershed.It's a catch 22. I don't want to grow more. I am not trying to get rich, I am trying to live in harmony with nature and grow my own food and take care of my land and be respectful of the environment and the community. I

think a lot of other people in humboldt share this ideology. We need to find a way to target the large growers in this order and allow some flexibility for the small farmers who are not the problem.

One way to do this is by square footage: In program framework, section 17, it states the garden size must not exceed 2,000 sq. ft. This could be done by acre, because larger properties should be able to grow more, because small properties next to each other create a cumulative impact on watersheds. I think one large plant per acre is a good place to start. One large plant needs 150 to 200 square feet. so, 200 sq. ft. per acre. Nobody should be growing more than 100 plants so set the total area at 20,000 square feet. There is an opportunity here to create an incentive to grow less, which would help achieve your goal of improving water quality. Here is one option of creating an incentive to grow less and use less water:
If a farmer is fulfilling most standard requirements and show good faith to try and achieve all of them and trying to get to tier one and is under (50 plants) 10,000 sq. ft. total and less than (1 plant)200 sq. ft. per acre then they should be charged a smaller fee, they are not visited by other agencies i.e. fish and game, sherifs…if they are using drip irrigation, then they don't need to purchase more water tanks unless there is grant money provided, and there will be grant money provided to improve roads.

In section 5 e. water storage and use, it states the appropriate permits need to be obtained for water usage and storage. This should be waived for small cannabis farmers, under 50 plants, who are doing there best to conserve water by using mulch and drip irrigation, and who can show they use less than 10% surface water personally and 25% of the surface water, cumulatively as a community in their watershed. If you don't adopt this policy or some incentive similar to this I believe most farmers will choose not to register because it is going to be nearly impossible to get all the necessary water rights and fulfill all of your standard requirements.

For example, in my situation, I would need a riparian water right because I divert about 10% of a spring that flows into a creek into 5,000 gallons of water storage and whatever I don't use overflows back into the creek. If I could get the riparian water right and show I use less than 10% of the flow, I would hope that I would be OK, but I am unsure that I will be able to get this water right, and I am hearing that you would prefer if I stored the water. To store the water I would need a appropriative water right which are very hard to get. Even if I did get it, I wouldn't want to use water stored for more than a month as my drinking water, so I would want to use the riparian water right for my household use. In talking about this with Connor and the state water board members I fear that I will not be able to get these permits. Why not simplify your program here and omit section 5 e that states farmers need to get the rights. If you just focused on water quality issues it would be much more effective. At least include a clause that states that small cannabis farmers i.e. less than 50 plants and less than 10,000 sq. ft., less than one plant/acre, who use drip irrigation and mulch, who use less than 500 gallons a day, who voluntarily register with this order, who cooperate and show good faith to achieve tier 1 and standard requirements to the best of their ability, and collect the water from their own property and use less than 10% flow, 25% cumulative as a community in watershed, are exempt from obtaining water permits. I think if you do this you will encourage people to use less water and you will get more people to voluntarily register, your program will be much more effective and the rivers and creeks will flow cleaner and clearer throughout the summer.

In section 36, it states there will be no decrease in water quality resulting from this order.
I can envision a scenario where farmers are attempting to meet all the standard requirements and they can't afford all the upgrades to roads and water systems. Many farmers will need to grow more to raise the money to achieve your standards. This means they use more water and it could decrease downstream water quality.
How can we avoid this scenario? I think having some financial assistance program, maybe a tax on each plant that is grown goes to a pool of money that can pay for road upgrades, water storage systems. Maybe grant money to improve water quality in the drought can be applied to farmers who want to cooperate and improve their roads and water systems. Or having a clause in your order that states less than 2000 sq. ft. are given more leeway in road standards and water usage and storage standards and they don't have to pay a fee because they are a small grow. Less than 10,000 sq. ft. can have a clause as I outlined above. In my opinion there needs to be some system in place similar to what I have outlined that serves as an incentive to grow less and use less water. If there isn't people will either not cooperate or they will grow more to raise money for all of these improvements.

Thanks you for all your hard work in this matter. Thank you for your time and consideration in reading my ideas and I hope you can incorporate some of them to make your program more inclusive and more effective. I want to see these regulations succeed and may the rivers flow cleaner and clearer…

Feel free to contact me with any questions,
I would love to help more with this matter,
Thanks,
Gueren
[redacted]

June 8th 2015

NCRWQCB

JUN 10 2015

EO ____ WMgmt ____ Admin ____
AEO ____ Timber ____ Legal ____
Reg/NPS ____ Cleanups ____ KG
Date

To whom This May Concern:

The North Coast Regional Water Quality Board has GONE TOO FAR this time.

The new draconian regulations on Cannabis is a heap of cockamaymee B.S.!!! OK?

The so called "3 tier" regulation is nonsense and vindictive against a single plant while Venters and growers of grapes for wine get carte blanche — They are destroying ALL the feeder streams but their millionaires assure that ZERO punative action will be taken against them. I implore you to read the enclosed AVA article by Will Parrish.

IF Cannabis is so pernicious why not use the EXISTING Laws to get the destructive growers instead of using a "crisis" to manufacture

new laws.... unless for more unmitigated Power and Control. You must realize these new rules VIOLATE the Constitutionally protected right of freedom from Search and Seizure ie the 4th Amendment as well as the 5th Amendment from freedom of self incrimination. That means you either intend to undermine our right or you dont care. We care, the people of this County and State and nation and we will hold you accountable..... Oh as "apparatachiks" you are just appointed of course but we do vote and you have already lost.

Enforce Existing Laws and leave Cannabis alone! We are NOT SHEEP.

IF you impliment this cruel regime and hoist this "petard" upon the people of the North Coast the response will not be very pretty and eventually massive LAW Suits will gut your edicts. A disgruntled Citizen

Water Quality Control Board,

Thank you for the opportunity to comment on your proposed marijuana cultivation guidelines. I have read your draft proposals and let me start by saying that I believe all water, stream, lake, spring, ground, or otherwise belongs to all life and should therefore be protected.

I moved to Garberville in May, 1985 and although well established at the time, growing marijuana has become absolutely and hopefully, not irreversibly, out of control. I feel it has been this way for decades. Climate change, the current drought situation, falling market value and therefore increased plant count, have us in an eleventh hour, fifty ninth minute / perfect storm, situation.

Watersheds in our area simply cannot support the amount of human activity this black market, gold rush has created. It is the cumulative impact of these activities whether they are the use/abuse of poisons and fertilizers, sewage disposal, soil disturbance, vegetation removal, domestic animals, water use etc. that has us in the predicament we are in.

Water is the master link for life on earth and should therefore be afforded the highest protection. I would encourage you to err to the restrictive side of regulation when starting out, as it has been my experience it is much easier to ease restriction if found excessive than to increase if found lacking. Be proactive rather than reactive please

Along with laws you enact there MUST be enforcement and for those who do not comply there MUST be consequences. There is no time for foot dragging. This unlawful, lucrative industry has operated with near impunity for years and as such will slowly accept regulation, if at all. Some will go willingly, as they see the need, others will go reluctantly, but will go and others will not comply. Those who resist I trust will be dealt with accordingly. Please make the protection of our environment your top priority.

Sincerely,

Larry Bruckenstein

[redacted]

[redacted]

Kendra Miers
AquaGaia Engineers
2149 Lewis Avenue
Arcata, CA 95521
(707) 497-4149
Kendra@aquagaiaengineers.com

June 8, 2015

Diana Henrioulle, P.E.
Senior Water Resource Control Engineer
5550 Skylane Ave., Suite A, Santa Rosa, CA 95403

Re: Comments on Draft Order No. 2015-0023

Dear Ms. Henrioulle,

This correspondence addresses the public review draft of the Waiver of Waste Discharge Requirements and General Water Quality Certification for Discharges of Waste Resulting from Marijuana Cultivation and Associated Activities or Operations with Similar Environmental Effects In the North Coast Region.

I am an environmental engineer living in the Humboldt Bay region. I have a degree in Environmental Resources Engineering from Humboldt State University, and I have worked in engineering consulting since my graduation in 2011. Within and outside of my work as an engineer and environmental professional, I have had many opportunities to witness the ways and means of rural marijuana cultivation throughout the North Coast region. Understanding the social aspects of the culture surrounding cultivation and associated activities has only made me more passionate about protecting the watersheds of this area. I believe this spot on the planet is very special, and I want to keep it this way.

In general, I find the above-referenced order well-conceived and in a spirit of stewardship that will help greatly in getting compliance from a majority of dischargers. There are a few things I would suggest that your staff consider for the final waiver.

First and foremost of concern from clients and other interested parties is privacy. In my opinion, this is the biggest hurdle for enforcement of this order. This means that if you want Tier 1 and Tier 2 dischargers to enroll and comply, you must guarantee that information on locations, names, and operational details must be kept within the Regional Water Board,

and this committee specifically. I always encourage my clients to obtain permits for buildings, but sometimes, all I can do is advise them on general construction BMPs in order to protect the water courses on their land. I must be confident in stating that their information will not be shared with any other agency. If you plan to share information, with even the State Water Board, please disclose this fully, and right away. If this trust is broken, word will spread very quickly.

I have also heard the suggestion for a program for anonymous tips on environmental crimes.

My other comments …:

- The 2000 ft^2 limit for Tier 1 dischargers needs more detail in how it will be measured (canopy or ground area; stalk or disturbed earth).
- For the Tier 2 land area limitation (>2000 ft^2), I assume that you meant to include sites with a standard commercially available greenhouse, which is about 2500 ft^2. It seems that this parameter may not even be necessary. For example, a site could be using well water responsibly, and be several thousand feet from a surface water body, with well-constructed roads, AND have a cultivation area of 3000 or even 5000 ft^2. This site could be designated Tier 1, and fees could be assessed in proportion to the cultivated area.

I commend the Regional Board for taking this step to put a framework for regulation in place prior to marijuana legalization. However, it may not be until after this law is officially changed that we can get a significant volume of dischargers to voluntarily enroll.

I will be submitting a proposal for approval as a third-party certifier, and I look forward to communicating and working with staff as this order and associated programs are finalized.

Sincerely,

Kendra Miers, EIT
California Water Operator, Grade T2

From: Julia Carrera [mailto:julia.inspector@gmail.com]
Sent: Tuesday, June 09, 2015 4:28 AM
To: St.John, Matt@Waterboards; Olson, Samantha@Waterboards; Henrioulle, Diana@Waterboards; NorthCoast
Subject: SFA Addendum to Comments on Order No. 2015-0023

VIA EMAIL

Board of Directors and Staff
North Coast Regional Water Quality Control Board
5550 Skyland Blvd., Ste. A
Santa Rosa, CA 95403-1072

RE: California Regional Water Quality Control Board, North Coast Region
Order No. 2015-0023
Draft Waiver of Waste Resulting from Marijuana Cultivation and Associated Activities or Operations with Similar Environmental Effects in the North Coast Region

Dear Board Members and Staff,

Thank you for your time and efforts in our meeting last Thursday, June 4, 2015 regarding our submission of comments for the above referenced Order.

At the direction of Staff, this is our follow-up document as a result our last meeting.

Point of Clarification:
Does the proposed 2,000 square foot canopy include foul pens or other animal husbandry free ranging, or trellised fruits and vines?

Comments:
1. Cultivation: As addressed in our previous letter, 2,000 square feet is more appropriate for a back yard garden. Out of the 10 farms inspected thus far in 2015, the average size of the area under cultivation, including vegetables (not orchard) is 1.5 acres. The 10 farms range from 1 to 2 acres. We are recommending the use of 1.5 acres in place of 2,000 square feet. If there is orchard, the acreage is increased substantially.

2. Fees: The estimated quote for tier 1 was $500, tier 2 $1500 and tier 3 $2500. This fee schedule is out of reach for the SFA farmer in tier 2. The SFA farmer typically does not fall into the tier 3 level. We recommend varying levels within the tiers for cost effectiveness. We are requesting a reduced fee in tier 2 to accommodate the Mendocino County farmer who takes home on average $15,000 to live on per year based on the 25 plant cap in Mendocino County. We propose the following ways to accomplish this:
a. Tier levels 2 and 3 fee structures..ie: Tier 2 $750, $1,000 or $1,500
b. We propose an introductory reduced fee for all tier levels to help bring people into your program. This can be done through a reduced fee with 3rd parties, or, some sort of amnesty through a reduced fee - sign up early and it's less expensive.
c. A general concern of the SFA is your Order is written for the "bad players" in the industry, who will not comply with the Order. It is a financial burden for the "good players" to have to

financially pay for the "bad players" farming practices. With regulation comes fees, of course. With fees from the Water Board, Fees from State Regulation and fees from Local Regulation, along with building code fees and costs, the total cost to continue farming medical cannabis may push a large number of farmers deeper under ground who can not afford to be regulated if the total costs to be regulated are not within a farmers financial means. (Farmers who are currently operating within the 2008 Attorney General Guidelines are reimbursed for their costs and labor only, with a take home income of $15,000-$60,000 depending on the County plant count cap). This is not a result any of us want. And of major concern for the SFA.

3. Letter of Intent Deadline: We recommend moving the intent deadline to January 1, 2016, as the current deadline is in the middle of harvest season. Very few farmers will have the time to process a letter of intent prior to your original deadline.

4. The SFA recommends a review process, similar to a sunset clause, for receiving community input through evaluation and revise this order according to field experience and community evaluation.

Thank you for the opportunity to follow-up with additional comments. The Small Farmers Association looks forward to our continued collaborative efforts for your programs success.

Sincerely,
Julia Carrera
Neutral Third Party Inspector
SFA Representative

From: Nancy Nichols
Water concerns us all!
Environmental Impact!! Public Health!

July 7, 2015

To: **All responsible officials, Federal, State, County and City,**
And, to all concerned Tax Paying Citizens of our Great State of California and County of Siskiyou:

Re: Our County's Water, Health, Safety and Property Codes.

My concerns, aggravation and legitimate questions are as follows:

Is our beautiful State of California Going to POT? Yes.

Are the Federal, State, County and City codes and regulations being overlooked ? Because of lack of resources, funding? Or in the blight of bigger crimes, the enforcement of less important things like property and residency requirements, wastewater disposal systems, power, established water systems will be put on hold, with a "get to it later" attitude? But then, on these now non-compliant residences, the huge problem develops, the cultivation of cannibis plantations, apparently far exceeding the plant limits as stated in our County regulations!

Forget the fish!
Forget the Governor's mandate of the statewide and cities Water reductions!
Forget the Farmer's growing our food, and their forced water allotment cutbacks!
... But illegal POT grower's water use is not considered? How many gallons of water will one cannabis plant require? Approx 6 gallons per day! (Mother Jones .com)Where are they getting their water for these big plantations? Surely not from the city water hydrants! Surely not from the rancher's irrigation wells! It is so apparent the marijuana plants take a lot of water. There are at least 5 different water companies delivering water to the "grows" in our area, sometimes 2-3 trips a day. This does not include the private vehicles that have 2-250 gal. tanks on the back of their pickups, making several trips a day to refill their tanks with water.

Our water sources for our cities and rural consumption are not endless! Drought years demand that we anticipate that it could get worse! Our underground aquifers are at risk. *We all know this!* Save our water!

Now, I have considered the medical necessity of cannabis. There can't be that many sick people in this area, requiring as much as is being grown. Recreational marijuana? Hmmm.

Who is footing the bill on these big grows? The thousands and thousands of $ being spent on *WATER*, fencing, compost, water storage containers, hot houses, irrigation equipment, lumber for the pot pots, garden sheds, screening and on and on! Hey, this is not on just several parcels, it is probably more like 70 different parcels, just in our sub-division. Add up the cost. I'd guess it's closer to a million spent. Someone is not just "breaking even," there will be lotsa money at harvest

time. Which, by the way, I think harvest has already started. The two U-Haul vans come and go regularly now. Why can't there be an early POT harvest? We have "early veggies" on the market now!

All this worries me. Is this a subtle terrorist action? "Hey, Siskiyou County is wide open for us to grow! Get in on the action while ya still can!!?" (new grows are starting even now.) Will our county be taken over completely???

So finally, the health and environmental impact. It's already here. The visual residue affecting health and ecology is here. Water leaving, going, gone?

We need help! We should not have to condone, pardon or enable this blatant disregard for our laws and civilized lives! Please, California, Who will step up to the line? We can't just gripe among ourselves. What can we do?

Sincerely,

Nancy Nichols
Montague, Ca. 96064