

Oct. 7, 2016

State Water Resources Control Board  
Division of Water Rights  
Cannabis Interim Flow Unit  
P.O. Box 2000  
Sacramento, CA 95812

**Re: Comments on Commercial Cannabis Cultivation –Interim Principles and Guidelines**

Dear State Water Resources Control Board,

South Fork Trinity Up-River Friends is submitting these comments for CCC-Interim Principles and Guidelines. We incorporated the following comments in our **CEQA PEIR Scoping Comments** submitted to CDFA regarding Medical Cannabis Cultivation on Sept. 30, 2016, regarding water quality:

*Hydrology and Water Quality: Water from rivers and streams is frequently diverted for cannabis cultivation sites, often in violation of state and federal rules, and to the detriment of fish and aquatic species. “Waters of the State” laws must be immediately enforced. Each licensee must possess a legal water source adequate for the scale of cultivation proposal. SWQCB requirements for the Region must be met. Almost all North Coast waters are critical for salmonids. Sediment from bulldozing, garbage and chemicals is often running into streams and rivers in the form of excess water use or runoff. Serious environmental consequences can occur, and the PEIR should address these impacts.*

*Cumulative Impacts: Sensitive natural areas and watersheds are less able to absorb or recover from the negative environmental impacts of cannabis cultivation as currently practiced by most growers. The PEIR needs to evaluate the cumulative impacts, and the number of licenses and total cultivation acreage for a specific watershed or natural area should be based on the combined past, present and future impacts of cannabis and other agricultural cultivation.*

*The PEIR should address robust road, landing maintenance and restoration programs that fully offset adverse effects of cultivation sites, such as reduction of sediment sources to benefit fish and aquatic systems. The PEIR should consider alternatives which avoid or minimize extensive roadwork in watersheds that exceed the Threshold of Concern for cumulative watershed effects. The Clean Water Act method of measurement of TMDL on critical watersheds is a good model.*

*Similarly, the aggregate number of indoor cultivation permits will affect the cumulative impact on greenhouse gas emissions, and the PEIR needs to evaluate the cumulative impacts in this area as well. Amounts of water used at indoor sites must comply with Water Rights laws and local ordinances.*

*It is imperative that until Regulations are in place, steps are taken to minimize destruction of our natural systems.*

### **Additional Comments**

Specifically, Interim Flow Regulations in Interim Principles and Guidelines must address needs for salmonids.

Decreased flows due to diversion increase water temperatures , a critical factor for salmon survival at all stages in their life cycle.

These regulations must be in accordance with Water Rights Laws.

We encourage clearly distinguishing responsibilities among state agencies on a continuing basis for clarity.

Thank you for your consideration of these comments.

Sincerely,

South Fork Trinity Up-River Friends

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Karen Wilson