

TO: WOM IT MAY CONCERN AT THE CWRB, CA.

DATE: SEPTEMBER 06, 2015

RE: PUBLIC COMMENT ON WATER QUALITY AND WILDLIFE THREATS IN THE CENTRAL VALLEY/AND THE PROPOSED THREE TIERED CULTIVATOR SYSTEM

FROM: A VERY CONCERNED CA. CITIZEN

TO THE READER, PLEASE FIND COMMENTS WRITTEN IN LARGE BOLD LETTERS, RESPONDING TO CERTAIN PASSAGES IN THIS FACT-SHEET. THANK YOU.

Marijuana Cultivation in the Central Valley Threatens Water Quality and Wildlife

Cultivation of marijuana in the Central Valley Region has grown exponentially in recent years, both in the number of grows and the size of grow operations. The growing operations are appearing on both private and public land. The Central Valley Regional Water Quality Control Board (Central Valley Water Board) is not interested in entering the debate over the legality of growing marijuana in California, other than to note that any growing operation on public land is illegal regardless of the crop. The Central Valley Water Board has jurisdiction over discharges of waste that could affect waters of the State, regardless of what activity is generating the waste. The Central Valley Water Board does not in any way authorize, endorse, sanction, permit or approve the cultivation, use, or sale of marijuana or any other illegal activity.

The Central Valley Water Board has serious concerns about the water quality impacts from the dramatic increase in growing activity on both public and private land. **The Problem** Growers have engaged in a variety of activities that can threaten or damage riparian and aquatic habitat and groundwater, including:

grading, terracing, dam, and road construction without permits, leading to the filling of streams through erosion and sediment deposition;

deforestation and habitat fragmentation;

illegal use of rodenticides, fungicides, herbicides and insecticides;

use of soil amendments and fertilizers in situations where run off to surface waters may occur;

discarding of trash and haphazard management of human waste;

substandard storage of hazardous materials such as diesel and gasoline; and

unauthorized diversion of water from streams.

These activities impair beneficial uses of waters of the state, from municipal drinking water to swimming, and from agriculture to preserving habitat for endangered fish and wildlife.

Isn't Marijuana Cultivation a Big Economic Boost to the Region?

That may be true, but marijuana growers cannot be allowed to circumvent environmental regulations that other industries must follow. Water quality, fish, and wildlife are public trust assets that shouldn't be sacrificed for private economic gain. **How Big is The Problem?**

No one knows the true scope of the increased growing activity and the related quantity of water being diverted from local streams, because most growers do not register or apply for permits from the various agencies involved in protecting water quality, existing water rights, and wildlife. **AND SINCE THE CVWB DOESN'T KNOW THE TRUE SCOPE OF THE PROBLEM, THE CVWB HAD BETTER FURNISH ESTABLISHED INDEPENDENT FINDINGS IN APPROPRIATELY CONDUCTED RESEARCH PRIOR TO EXERCISING ANY OF YOUR AUTHORITY ON MEDICAL MARIJUANA (MMJ) GROWS IN THE STATE AS IT RELATES ANY AND ALL OF THE DEGRADATIVE EFFECTS THIS PRACTICE HAS HAD ON CA. YOU HAVE HAD APPROXIMATELY 20 YRS TO STUDY THE "PROBLEM" SINCE IT BECAME LEGAL IN THE STATE. WHICH BEGS THE QUESTION: "WHY ALL OF THE SUDDEN, ALL THIS CONCERN??" BASED ON EXTREMELY LIMITED INFORMATION? SOUNDS LIKE "SHOOT-FROM-THE-HIP"... ASK QUESTIONS LATER PROPOSAL BY THE CVWB. THIS TYPE OF KNEE-JERK RESPONSE SOUNDS LIKE IT'S COMING FROM A BACK-WOODS RURAL COUNTY GOOD O'L BOY NETWORK RATHER THAN THE STATE. MAYBE THIS STATE AGENCY LET THESE TYPE OF PEOPLE LARGELY INFLUENCE THIS CRAZY LOGIC. IF SO, SHAME ON THIS REGIONAL AGENCY FOR PUTING THE REST OF THE STATE IN BAD LIGHT. THE FACT THAT IT'S BEING ATTEMPTED THIS WAY IS BAD ENOUGH.**

A Department of Fish and Wildlife study of two small watersheds in Humboldt County that used aerial imagery indicated that the number of acres devoted to marijuana growing almost doubled from 2009 to 2012, with an estimated 550 individual growing operations and 19,000 plants in each watershed. Similar numbers have been reported in watersheds throughout the Central Valley Region. **A DFW STUDY IS A "SELF-INTERESTED" STUDY AS IT RELATES THIS ISSUE. MEANING, DFW AND THE CENTRAL VALLEY WATER BOARD (CVWB/YOU) LIKELY WORK CLOSELY TOGETHER AND SHARE COMMON GOALS. THERE NEEDS TO BE COMPARATIVE STUDIES CONDUCTED THAT ARE BY REPUTABLE UNIVERSITY/OUTSIDE CONSULTANCIES THAT GET THEIR MONIES FROM NON-SPECIAL INTEREST FUNDS TO CONDUCT THIS KIND OF RESEARCH. AND THEN,**

HAVE THOSE STUDIES PUBLISHED AND DISCUSSED AMONG THE EXPERTS IN THE BUSINESS /ACADEMIA AS IT RELATES THE DEGREE OF NEGATIVE IMPACTS ON WATERSHED MGT. BTW, HUMBOLDT COUNTY IS NOT JUST A "RANDOM" COUNTY SELECTION (AND, IT'S NOT EVEN IN THE CVWB'S DISTRICT). OR, IF IT WAS, IT'S HELD SUSPECT AS A CHOICE COUNTY FOR THE OBVIOUS REASON THAT IT'S GROUND ZERO/ THE EPICENTER OF THE EMERALD TRIANGLE/TRADITIONALLY THE BIGGEST PRODUCING AREA OF CANNABIS IN THE STATE. PERHAPS FOR THE ENTIRE COUNTRY. HOW IS THIS COUNTY REPRESENTATIVE OF THE AVERAGE REST OF THE STATE/CVWB AREA?? THE CVWB HAS GOT A LOT OF QUESTIONS TO ANSWER...AND, TANGIBLE/WELL FOUNDED EVIDENCE TO PRODUCE.

What's Being Done About It?

Just like any other person who develops their property, marijuana cultivators must first obtain all the appropriate permits to ensure that their site development activities are done in a manner that is consistent with federal, state, and local laws and regulations. The attached information sheet identifies several types of permits that marijuana cultivators may need to obtain before developing their property, and explains some of the steps that marijuana cultivators must take to comply with site development requirements and the state regulations that apply to reporting diversions of water. These permits and requirements apply to *any* site preparation work, regardless of crop. **GOOD. BECAUSE, MANY PEOPLE WILL BE CONTACTING OTHERS THAT ARE NOT GROWING MMJ, BUT OTHER VEGETATION IN ROUGHLY THE SAME ZONING, TERRAIN, WATERSHED SENSITIVE MGT, ETC.. AREAS, TO ASSESS WHETHER THEY'RE BEING HASSLED IN THE MANNER BEING PROPOSED BY THE CVWB ON MMJ GROWS. BUSINESSES/NON-BUSINESSES ALIKE.**

In addition to these existing laws and regulations, the Central Valley Water Board is also developing a regulatory program designed to ensure that marijuana cultivation activities do not result in adverse water quality impacts. **QUESTION: HOW CAN THE CVWB DEVELOP A REGULATORY PROGRAM DESIGNED TO ENSURE THAT MMJ ACTIVITIES WILL NOT RESULT IN ADVERSE WATER QUALITY IMPACTS IN THE SAME MANNER AS ANY OTHER VEGETATION BEING GROWN WHEN THERE IS NO EVIDENCE THAT PERSONS ON PRIVATE LANDS HAVE IN ENGAGED IN SUCH ACTS AND IN SUCH NUMBERS THAT WOULD REQUIRE THESE KIND OF REGULATIONS TO BE PROMULGATED IN THE FIRST PLACE? ISN'T THIS WAAAY PUTTING THE CART BEFORE THE HORSE MENTALITY?? IT IS. AND, THE CVWB HAS GOT TO KNOW THAT.** Medicinal marijuana cultivation may eventually become part of the Board's existing Irrigated Lands Regulatory Program, or the Board may develop a different regulatory approach for dealing with marijuana cultivation activities. **ONLY WHEN SUFFICIENT EVIDENCE HAS BEEN PRODUCED THAT THIS ACTIVITY NEEDS YOUR KIND OF REGULATION; OR, WHEN MARIJUANA CULTIVATION BECOMES COMPLETELY LEGAL IN THE STATE, AND AGAIN, IF THERE IS AMPLE EVIDENCE TO REQUIRE ANY OVERSIGHT/ENFORCEMENT FROM YOUR AGENCY. AS YOU (THE CVWB) SEEM TO BE KEEN TO THE FACT THAT MANY (AGENCIES) ARE VYING FOR JUST THIS OPPORTUNITY AS WELL. AND, IT'S NOT FOR THE CAUSE.. : "IMPENDING ENVIRONMENTAL DEGRADATION" OH, YOU KNEW THAT TOO.**

The Central Valley Water Board is also increasing the resources that it will devote to investigating and prosecuting marijuana cultivation activities that threaten to impact water quality, aquatic life, or wildlife habitat. **WELL, THE CVWB SHOULD HAVE INITIATED THAT PROCESS OVER FORTY YEARS AGO WHEN ALL OF THIS (ILLEGAL MARIJUANA GROWS) WERE HAPPENING IN THE STATE. WAY BEFORE PROP. 215 IN 1996. ESP. ON STATE AND NATIONAL FOREST LAND WHEN IT WAS WELL KNOWN ALL THAT DEGRADATION WAS GOING ON. WHY ALL OF THE SUDDEN A BIG (beaureacratc gold digger??) RUSH?? (OR IS HAS THE STATE BECOME A RESENTFUL BIG-TIME FARMER ADVOCATE??) THAT WAS YOUR JOB THEN. WHY DO YOU SEEM TO BE SHIFTING YOUR FOCUS ON A GROUP OF PEOPLE THAT DON'T HAVE MUCH TO DO WITH THIS... "PROBLEM"?** SOME FOLKS LIVING IN THE CENTRAL VALLEY ALREADY HAVE THEIR NOTIONS WHY. Furthermore, it is also worth noting that the Board's regulatory activities can only provide permit coverage for growing operations on private lands; marijuana cultivation on public lands will not be authorized. **AGAIN, THE CVWB NEEDS TO ADEQUATELY DETERMINE THE DEGREE OF THE IMPACT CAUSED BY PRIVATE LAND MMJ GROWERS VS. THOSE ON LANDS GROWING MARIJUANA ILLEGALLY. AND, THAT'S GOING TO TAKE A LOT OF TIME. TIME, THAT THE CVWB HAD, BUT SQUANDERED. THE CVWB CAN'T JUST GO FOR A TARGET BECAUSE IT'S AN EASY SCORE; AND WHEN THE BRUNT OR THE ENTIRE RESPONSIBILITY OF ENVIRONMENTAL DEGRADATION FALLS LARGELY ON THE ILLEGAL GROWS ON STATE/FEDERAL PROPERTY. THERE IS PLENTY OF EVIDENCE IN THE PRESS ALONE THAT SUPPORTS THE ARGUMENT THAT IT'S THE ILLEGAL GUYS THAT ARE CAUSING THE PROBLEM. I'M SORRY IF THE CVWB CAN'T CATCH THEM IN TIME TO PROSECUTE AND THEN FINE THEM. BUT, THE CVWB WOULD BE MAKING A RATHER LARGE LEAP/ STRETCH TRYING TO GO AFTER A GROUP OF PEOPLE/AT THEIR LOCATION ON THEIR OWN LAND, THAT VERY LIKELY HAVE NO/OR NEGLIGIBLE NEGATIVE EFFECT ON THE ENVIRONMENT AS A RESULT OF THEIR GROW.** The State and Regional Boards, including the North Coast Water Board and the Central Valley Water Board, are committed to helping educate both the public and the cultivators about proper permitting and growing practices in their respective water board regions. **REALLY? WHAT DOES THE CVWB HAVE TO OFFER AS IT RELATES PROPER GROWING PRACTICES? I'D BE FASCINATED TO KNOW... OUTSIDE OF WHAT MOST FOLKS WOULD DEEM AS GENERAL RESPONSIBLE GARDENING/ENVIRONMENTAL STEWARDSHIP. (YOU'D BETTER ALSO BE HASSLING GRANDMA VEGETABLE GARDENS ON SIMILAR SIZE LOTS/SENSITIVE AREAS**

RELATING TO "BEST GARDENING PRACTICES." OR, 5 ACRE RANCHETTE'S WITH SEVERAL HORSES, A COUPLE OF PIGS, 10 CHICKENS WITH A LARGE 1/2 ACRE OR BIGGER, VEGETABLE GARDEN/ ORCHARD....ALL FOR PRIVATE CONSUMPTION, FOR EXAMPLE. IS THE CVWB MEASURING AND REGULATING ALL OF THOSE WASTE STREAMS NOW? HAVE YOU BEEN? ESP IN SENSITIVE WATERSHED AREAS??) Additionally, local, state and federal agencies, including the State and Regional Boards, are working together in task forces to find illegal growing operations and enforce applicable laws. **WELL, THAT'S WHAT YOU SHOULD BE DOING AS A MATTER (YOUR MAIN JOB AROUND THIS) OF COURSE, AND NOT "additionally..."** SO, YOUR MOTIVATIONS THUS FAR, BASED ON THE INFO ON THIS "FACT-SHEET" ARE HELD SUSPECT IN THEIR MOTIVATION. COULD IT BE ABOUT.....MONEY?!??? MONEY THAT MOST PEOPLE DON'T HAVE THESE DAYS. I CAN'T THINK OF ANY OTHER CREDIBLE REASON. AGAIN, SHOULDN'T HAVE THE PUBLIC'S HEALTH/WELFARE BEEN THE PRIME MOTIVATION ON THIS FRONT 40+ YEARS EARLIER?? SEE WHERE I'M GETTING AT, YET?

What Can the Public Do to Help?

The public can help in two ways: making friends and neighbors aware of the issues; and reporting water quality violations they see to the Central Valley Regional Water Quality Control Board. **YES. THIS IS ALWAYS APPROPRIATE FOR REASONABLE COMPLAINTS. AND, THIS METHOD SHOULD BE THE ONLY DRIVER IN YOUR EFFORTS TO REGULATE PRIVATE LAND MMJ GROWS, FOR NOW.**

To file an environmental complaint, contact the Central Valley Water Board at the appropriate office listed below:

Sacramento Office

11020 Sun Center Drive, Suite 200 Rancho Cordova, CA 95670-6114 Phone: (916)464-3291 Fax: (916) 464-4645

Fresno Office

1685 "E" Street Fresno, CA 93706-2007 Phone: (559) 445-5116 Fax: (559) 445-5910

Redding Office

364 Knollcrest Drive, Suite 205 Redding, CA 96002 Phone: (530) 224-4845 Fax: (530) 224-4857

Or, you can submit an environmental complaint to Cal/EPA via the following web link:

http://www.dtsc.ca.gov/database/CalEPA_Complaint/index.cfm (This site can also be used for water right complaints)

Following is an informational sheet on how to comply with necessary permitting requirements:

To: Interested parties and agencies

SUBJECT: 215 Grow-Related Activities Which May Need a Regional Water Board Permit or Special Planning for Water Quality Protection

The cultivation of marijuana can harm our State's waters if it is not carried out in a responsible manner. If you are planning to develop land to grow marijuana in compliance with State law and local ordinances, there are several agencies you should contact BEFORE you get started. The Central Valley Regional Water Quality Control Board (Central Valley Water Board) is one of the agencies that may need to review and permit the activities associated with your project. The State Water Resources Control Board's Division of Water Rights is another. Before you start developing your property to conduct your growing project, here is a series of questions you should ask yourself to see whether your activities may need a permit from the Central Valley Water Board.

1) Will I be doing any work that involves digging or heavy equipment work in a watercourse/wetland or in a location where rain could wash dirt into a year-round or seasonal creek, river, wetland, or wet feature? **WHAT IN THE HELL IS A "WET FEATURE" TO AVERAGE CITIZEN??** 2) Will I be placing any type of material or structure in a stream, either year-round or seasonal (e.g., stream crossing, culvert, water intake, dam, etc.)? **BULLET ONE IS REASONABLE. BUT, FOR ANY TYPE OF AG OR PROCESS THAT WOULD INVOLVE THESE ACTIVITIES.** 3) Will I be diverting water from a stream? 4) Will I be building any roads, landings, terraces or other features that involve placement of earthen fill material on my land? 5) Will I be grading, excavating, or otherwise moving earth on my property? 6) Will I be using and/or storing pesticides, herbicides, fertilizers, fuel, or other chemicals on my property? 7) Will I be generating and/or storing solid waste (e.g., amendment bags, boxes, containers, dead plant material, waste soil, etc.) on my property? **YOU'RE (THE CVWB IS) OK UP UNTIL BULLET'S 6 & 7. THE CVWB IS OUT OF THEIR MIND'S AS IT RELATES THE CONCERN OF STORING AMENDMENT BAGS, DEAD PLANT MATERIAL, AND WASTE SOIL ON ONE'S PROPERTY. GOT NEWS FOR YOU: ALL RESIDENTIAL GARDENS IN SUBURBIA, HAVE THIS KIND OF THING GOING ON. AND, IT JUST GOES UP FROM THERE. THE CVWB DOESN'T DEFINE ANY CONSTRAINTS, EG: QUALITY/QUANTITIES OF THE AFOREMENTIONED. THIS ALSO INCLUDED THE STORAGE OF HERBICIDES, PESTICIDES, FERTILIZERS, AND FUELS. THESE SUBSTANCES APPLY MUCH IN THE SAME WAY AS IN SUBURBIA AND ANYWHERE ELSE SMALL SCALE GARDENING/ LANDSCAPE MAINTENANCE IS HAPPENING.**

If you have answered yes to questions 1, 2, or 3, you will probably need a permit from the State or Regional Water Board, and we suggest that you contact us at one of the three offices listed above to get further information about how to apply for the appropriate permits. **YOU'RE (THE CVWB IS) WRONG. AND BASED ON THIS FACT SHEET, IT'S VERY LIKELY NOT LEGAL FOR YOU TO BE IMPOSING THIS SCHEME ON ANYONE OPERATING ON THEIR PRIVATE LAND. NOT UNTIL THE GOVERNOR AND/OR THE LEGISLATURE FIGURE THIS THING OUT, LEGALLY. CAN'T WAIT. CAN YOU?** Note that any person who discharges waste to waters of the State without a permit may be subject to enforcement and possible penalties. Information about California water rights is available on the State Water Resources Control Board's Division of Water Rights website at: <http://www.waterboards.ca.gov/>

waterrights/. Any diversion and use of water without a water right, and a failure to report the diversion and use of water are also subject to enforcement and penalties. **I DON'T HAVE ISSUE WITH THIS. MAKES SENSE. BUT, IT CAN, AND WILL LIKELY BE COMPLETELY DIVERGENT FROM MOST INSTANCES RELATED TO MY PREVIOUS REMARKS TO THE FORMER REQUIREMENTS STIPULATED BY THE CVWB AS IT CONCERNS THE VAST MAJORITY OF MMJ GROWERS ON THEIR OWN LAND.**

If you have answered yes to questions 4 or 5, you may need a permit from the Water Board, and your project may harm water quality if not constructed carefully, subjecting you to enforcement and possible penalties. It would be advisable to hire a qualified professional with experience in erosion control to help you design and construct your project in a way that will avoid allowing sediment to get into waterways. We recommend that you contact the Central Valley Water Board to review your project and identify whether your project will need a water quality permit. **THE CVWB WOULD JUST LOVE NONE OTHER THAN TO HAVE ALL MMJ GROWERS TO JUST P/U THE PHONE AND SAY "HI" TO YOU GUYS, TO GET YOU BUSY TO (LARGELY) DO NOTHING PRODUCTIVE FOR THE CITIZENS OF THE STATE OF CA., AND THEN GET PAID FOR IT WITH OUR TAX DOLLARS, AND PERHAPS B.S. FINES THAT WILL END UP IN COURT COSTING THE TAXPAYERS AND THE STATE ECONOMY A BUNDLE. AGAIN, MONEY THAT MOST DON'T HAVE. IF YOU'VE BEEN AT FOLLOWING THE ECONOMY OVER THE PAST 10 YRS. THE ONLY WINNER WOULD BE: CVWB. SO, LONG AS THEY GET PAID, IT SEEMS, BY HOW THIS FACT-SHEET IS WRITTEN, IT DOESN'T MATTER IF IT WAS A LEGITIMATE CITATION OR NOT, THE CVWB DOESN'T SEEM TO REALLY CARE W/HOW ALL OF THIS IS GOING DOWN, IN THE MANNER THAT IT IS WITH THIS FACT-SHEET. WHOM IS THE PERSON CHARGED WITH THIS TASK?**

Finally, a yes answer to question 6 or 7 will not necessarily require that you get a permit from the Water Board if you manage these materials in such a way that they will not threaten to impact surface waters or groundwater in any way. **YOU SHOULD BE DIRECTING THESE COMMENTS TO THE BIG BOYS THAT HAVE THE BUDGETS TO GO AFTER THE BIG ILLEGAL GROWERS THAT ARE LIKELY CAUSING CLOSE TO 100% OF THE PROBLEM THAT YOU'RE SOOO CONCERNED WITH...JUST NOW.** AGAIN, THIS IS NOT THE VENUE OR A REASON FOR YOUR AGENCY TO GET INVOLVED. AT LEAST NOT YET. YOU DON'T HAVE THE EVIDENCE TO MEDDLE/GO AFTER PRIVATE LAND FOLKS. IT JUST OPENS UP THE FLOOD GATES FOR ANY OTHER SNOOPY AGENCY THAT, REALLY, HAS NO BUSINESS BEING THERE. WHICH WILL MAKE RESPECTIVE COUNTY GOVERNMENT'S LIFE A NIGHTMARE. UNLESS OF COURSE, A LEGITIMATE COMPLAINT COMES IN...THEN, YOU'RE OK TO GET INVOLVED AND EXECUTE YOUR MANDATE, AND DO YOUR JOB. JUSTLY. If impacts do occur, you are subject to liability for the water quality impacts associated with these activities. We recommend that as you design your project, you consider and identify suitable location(s) on your property, possibly within a container or structure, where you can safely contain such materials away from surface and/or ground waters in a manner that eliminates the possibility of discharge. **RIGHT. MOST OF US STORE CHICKEN SHIT; HORSE AND COW SHIT; USED SOIL IN SMALL COMPOST PILES (4X4 BINS). AGAIN, THE CVWB ISN'T GOOD WITH GIVING DEFINITIONS/ PARAMETERS/ AND, OR EXAMPLES OF WHAT ANY OF THIS MEANS. GIVE IT TO THE PUBLIC, AND SAVE YOUR SELVE'S, AND MORE IMPORTANTLY, SAVE US, SOME \$SUNNECESSARY\$\$ "PHONE CALLS..."**

Dumping or allowing sediment or other wastes to enter surface water, including streams or groundwater is illegal, as is discharging any of the materials noted above to surface water or groundwater. **AGAIN, IF THE CVWB IS NOT INFORMING THE PUBLIC AT LARGE OF WHAT YOUR INTENTIONS ARE WITH THIS FACT SHEET AS IT RELATES IMPROPER THIS OR THAT IN OR AROUND ONE'S GARDEN, IT MIGHT BE SEEN AS A PREJUDICIAL BY THE CVWB (WITH THE STIPULATIONS THROUGHOUT THIS FACT-SHEET) TOWARD MMJ GROWS ON PRIVATE LANDS. AND, THIS IS THE BEST THE STATE CAN COME UP WITH. WITH ALL THE RESOURCES CURRENTLY AND HISTORICALLY AVAILABLE TO THEM.** If you have any questions or would like assistance in reviewing your compliance with water quality laws and requirements and/or need for permits, please contact the Central Valley Water Board at (530) 224-4845. **I'LL BET THE CVWB HAS RECEIVED A "TON" OF PH. CALLS AFTER FOLKS HAVING READ THIS FACT-SHEET... I WOULDN'T BE SO CONCERNED ABOUT PRIVATE LAND PRODUCED MMJ AS I WOULD BE ABOUT THE FORMULATION OF THIS FACT-SHEET. IT STINKS!** Information about the Central Valley Water Board can be found at our website: <http://www.waterboards.ca.gov/centralvalley/>.

Updated 5.12.14

COMMENTS REGARDING THE "TIERED SYSTEM" PROPOSAL: IT'S ABSOLUTELY RIDICULOUS. IT'S BASED ON ACREAGE GROWN, AND NOT ON THE PROXIMITY TO A SENSITIVE WATERSHED; AND NOT ON A PROVEN HISTORY THAT MMJ GARDENS OF THE SIZES MENTIONED HAVE ACTUALLY CREATED A NEED FOR SUCH EXPENSIVE AND ONEROUS PERMITTING. THE ASSUMPTION IS ALSO BUILT IN THAT THESE GROWS ARE ACTUALLY GENERATING A REVENUE SUCH THAT UP TO AN A \$10,000 ANNUAL FEE IS CHARGED??! WHO CAME UP WITH THESE FIGURES AND HOW?? THERE SHOULD BE NO PERMIT FEES TO GROW MEDICINAL CANNABIS AT ALL, ESPECIALLY IF THAT GROW IS NOT LOCATED IN AN AREA OF POTENTIAL NEGATIVE IMPACTS. MOST ARE GARDEN SIZED!! THE SAME ARGUMENT (AS ABOVE) CAN BE MADE: WHAT IF THERE ARE 5 ACRE RANCHETTE'S WITH SEVERAL HORSES, A COUPLE OF PIGS, 10 CHICKENS WITH A LARGE 1/2 ACRE VEGETABLE GARDEN/ORCHARD....ALL FOR PRIVATE CONSUMPTION, FOR EXAMPLE. IS THE CVWB MEASURING AND REGULATING ALL OF THOSE WASTE STREAMS NEAR A SIMILAR WATERSHED AS A MMJ GARDNER NOW? AN MMJ GARDNER THAT IS USING A FRACTION OF THE

CHEMICALS AND EXPELLING A FRACTION OF THE WASTE?? THAT MEANS TO ME, MR. SNYDER, THAT YOU'RE PLACING ALL OF THESE "LIKE" HOMESTEADS ON TIER 3 AND CHARGE THEM \$10K A YEAR ALONG WITH AN ANNUAL SITE MGT PLAN. YOU'LL DO THIS IF YOU'RE REALLY CONCERNED ABOUT EQUITY WHEN IT COMES TO PREVENTING "ENVIRONMENTAL HARM." DON'T, AND YOUR AGENCY WILL VERY LIKELY END UP IN COURT SO FAST, ITS HEAD WILL BE SPINNING. AND, YOUR LEADERSHIP TENDERING THEIR RESIGNATION FOR THIS THOUGHTLESS AND GREED MOTIVATED PROPOSAL, IF EFFECTED. THIS SCHEME STINKS OF PREJUDICE. HOW DID THIS NOTION GET THIS FAR? THE STATE OF CA. IS IN THE PROCESS OF FIGURING THIS STUFF OUT IN SACRAMENTO. YOUR AGENCY REALLY NEEDS TO BACK DOWN FOR NOW. AMAZING.

Comm.