

COUNTY OF SANTA CRUZ

WATER ADVISORY COMMISSION

701 OCEAN STREET, ROOM 312, SANTA CRUZ, CA 95060
(831) 454-2022 FAX: (831) 454-3128 TDD: (831) 454-2123

AGENDA

SANTA CRUZ COUNTY WATER ADVISORY COMMISSION

Wednesday April 4, 2018, 4:00 p.m.

Fifth Floor Conference Room, Room 510 - County Governmental Center
701 Ocean Street
Santa Cruz, CA 95060

- A. **OPENING**
 - 1. Call to Order
 - 2. Roll Call
 - 3. **Election of Officers: Chair and Vice-Chair***

- B. **APPROVAL OF MINUTES:** February 7, 2018

- C. **PUBLIC COMMUNICATIONS**
Opportunity for members of the public to address the Commission on matters that are within the Commission's area of responsibility, but not on today's agenda.

- D. **COMMISSIONERS' REPORTS**
Opportunity for Commissioners to report on matters that are not on today's agenda.

- E. **STAFF REPORTS AND ANNOUNCEMENTS**

- F. **UNFINISHED BUSINESS – *indicates items for discussion**
 - 1. Pajaro Valley Groundwater Management Issues
 - 2. **Santa Margarita Groundwater Management Issues**
 - 3. Water Conservation Efforts, Countywide
 - 4. Update on County Water Resource Management Efforts
 - 5. **Mid-County Water Issues**
 - 6. County Commission on the Environment
 - 7. Update on Conjunctive Use and Groundwater Recharge Efforts
 - 8. Karst protection zone proposal
 - 9. Environmental Code Compliance
 - 10. Water Supply Planning
 - 11. County-wide Drought Response
 - 12. **Water Advisory Commission Attendance, Role, and Work Program***
 - 13. **Cannabis Cultivation**
 - 14. Riparian Corridor Protection and Management

G. NEW BUSINESS

1. **Groundwater, streamflow, fish and groundwater dependent ecosystems***

H. INFORMATION AGENDA

I. CORRESPONDENCE

2. March 1, 2018, letter from Water Advisory Commission to Board of Supervisors regarding Vision Santa Cruz County and Riparian Conservation
3. March 5, 2018, joint letter from Fish and Wildlife Advisory Commission and Water Advisory Commission to Planning Commission regarding cannabis cultivation

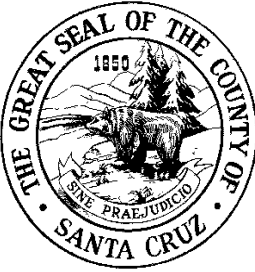
J. BOARD OF SUPERVISORS ACTION ON ITEMS AFFECTING WATER:

K. AGENDA ITEMS FOR FUTURE MEETINGS

L. ADJOURNMENT:

PLEASE CONTACT JOHN RICKER, (831) 454-2750, IF YOU ARE UNABLE TO ATTEND THIS MEETING

The County of Santa Cruz does not discriminate on the basis of disability, and no person shall, by reason of disability, be denied the benefits of its services, programs or activities. The meeting room is located in an accessible facility. If you wish to attend this meeting and you will require special assistance in order to participate, please contact Teresa Lautenschlager at 454-2022 at least 72 hours in advance of the meeting, to make arrangements. As a courtesy to those persons affected, please attend the meeting smoke and scent free.



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MINUTES

SANTA CRUZ COUNTY WATER ADVISORY COMMISSION

Wednesday February 7, 2017, 4:00 p.m.

Fifth Floor Conference Room, Room 510 - County Governmental Center
701 Ocean Street
Santa Cruz, CA 95060

A. OPENING

1. Call to Order: 4:00 PM

2. Roll Call:

Present: Hamilton-Monkerud, Wilson, Berry, Edgemon
Absent: Spencer, Gregorio, Sharp
Staff: Sierra Ryan, Environmental Health

B. APPROVAL OF MINUTES: December 6, 2017

Motion: Moved by Berry, seconded by Wilson, approved unanimously

C. PUBLIC COMMUNICATIONS

None

D. COMMISSIONERS' REPORTS

No Action

Question about ways to improve commissioner attendance.

E. STAFF REPORTS AND ANNOUNCEMENTS

No Action

Information was provided on the *Connecting the Drops* event in early February, and a recent announcement from DWR that all three regional GSAs are recommended for Prop 1 grant funding.

F. UNFINISHED BUSINESS – *indicates items for discussion

- | | |
|---|----------------------|
| 1. Pajaro Valley Groundwater Management Issues | <i>No discussion</i> |
| 2. Santa Margarita Groundwater Management Issues | <i>No discussion</i> |
| 3. Water Conservation Efforts, Countywide | <i>No action</i> |
| 4. Update on County Water Resource Management Efforts | <i>No discussion</i> |
| 5. Mid-County Water Issues | <i>No discussion</i> |
| 6. County Commission on the Environment | <i>No discussion</i> |
| 7. <u>Update on Conjunctive Use and Groundwater Recharge Efforts*</u> | <i>No action</i> |
| Sierra gave an oral report. | |
| 8. Karst protection zone proposal | <i>No action</i> |
| 9. Environmental Code Compliance | <i>No action</i> |
| 10. Water Supply Planning | <i>No discussion</i> |

11. County-wide Drought Response

No discussion

12. Water Advisory Commission Role and Work Program*

No action

Chris would like to revisit priorities at the next meeting. Commissioners should talk to their supervisors and get their feedback.

13. Commission Comments on the Cannabis Cultivation EIR

There will not be a programmatic EIR. Going to the planning commission on February 27th

Motion: Chris Berry motions to authorize a subcommittee of Monkerud, Edgemon, and Berry to review and co-sign a letter from the Fish and Wildlife Advisory Commission on the new cannabis ordinances if they choose to write one. Edgemon seconds, Passes unanimously.

G. NEW BUSINESS

1. Riparian Corridor Protection and Management*

Motion: Chris Berry motions that he should write a letter with editorial support from Hamilton-Monkerud and Wilson. Seconded by Wilson. Passes unanimously.

H. INFORMATION AGENDA

I. CORRESPONDENCE

J. BOARD OF SUPERVISORS ACTION ON ITEMS AFFECTING WATER:

January 24, 2018 – 34 - Approve allocations of \$12,445 from the Fish and Game Fund to six organizations and take related actions, as recommended by the Fish and Wildlife Advisory Commission and the Director of Health Services

http://santacruzcountyca.ig2.com/Citizens/Detail_LegiFile.aspx?Frame=&MeetingID=1646&MediaPosition=1608.923&ID=4779&CssClass=

January 24, 2018 – 36 - Accept and file the 2017 Water Resources Annual Report and the Report on the 2017 Resource Conservation District Landowner Assistance Program, as recommended by the Director of Health Services,

http://santacruzcountyca.ig2.com/Citizens/Detail_LegiFile.aspx?Frame=&MeetingID=1646&MediaPosition=1608.923&ID=4782&CssClass=

K. AGENDA ITEMS FOR FUTURE MEETINGS

- Water status report update
- Cannabis ordinance presentation
- Commission work program
- Commissioner attendance?
- Presentation on fisheries program from Kristen.

L. ADJOURNMENT: at 5:59

Minutes Prepared by: Sierra Ryan, EH Staff



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WATER ADVISORY COMMISSION

701 OCEAN STREET, ROOM 312, SANTA CRUZ, CA 95060
(831) 454-2022 FAX: (831) 454-3128 TDD: (831) 454-2123

March 1, 2018

County of Santa Cruz
Board of Supervisors
701 Ocean Street, 5th floor
Santa Cruz, CA 95060

Re: Vision Santa Cruz County and Riparian Conservation

Dear Honorable Supervisors,

We applaud your strategic planning process "Vision Santa Cruz County." We are at a unique time in our County's history where we are faced with many challenges but also presented with new opportunities, and your desire to develop an inclusive strategy to help the County navigate these issues is commendable.

As you know, our environmental quality is increasingly vulnerable due to the recent lapse of federal regulatory oversight, increased population pressure, climate change and other factors. Perhaps most importantly, our water resources are threatened by these factors as well as the historic lack of a management strategy for them.

Thankfully, in the past several years we have seen increasing coordination and collaboration on resolving our water resource challenges with great examples of such being displayed in the regional partnerships that are emerging to conserve the various County groundwater basins and surface water sources. Specifically, the City of Santa Cruz, County of Santa Cruz, San Lorenzo Valley Water District, the Coastal Watershed Council, the Resource Conservation District of Santa Cruz County and others have recently formed a partnership to focus and synergize conservation efforts of the multiple stakeholders in the San Lorenzo River watershed. This effort will not only help synergize local efforts but will also assist with bringing in outside funding that could strengthen this work and lessen the financial burden of doing so for local taxpayers. This effort is referred to as *San Lorenzo River 2025*.

Among the issues that this group is working on is *riparian conservation*. This issue is recognized as a priority in the federal coho and steelhead recovery plans and our County's own anadromous salmonid recovery strategy. Riparian corridors are streamside areas that are very important for a variety of reasons: they perform important functions including flood control, groundwater recharge, surface water quality, special-status fisheries' (such as coho, steelhead, tidewater goby, etc.) habitat protection,

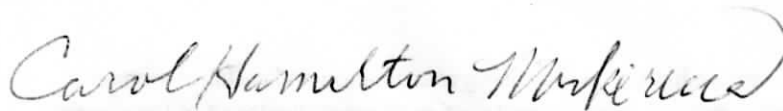
terrestrial biotic diversity and a host of others. Due to the development pattern in our County over the decades, particularly in the San Lorenzo River watershed, many of our riparian corridors have been diminished and are performing sub-optimally.

Unfortunately, with increased population pressure, climate change effects on hydrology, vegetation cover, fire frequency and related issues, it is unlikely that our riparian corridors will be able to continue serving their important aforementioned functions without a comprehensive strategy and a commitment to implementing that strategy. San Lorenzo River 2025 partners have developed a draft multi-faceted strategy that includes monitoring, enforcement, inter-agency coordination, policy updates, non-regulatory landowner incentives, restoration and educational elements. Given the County's jurisdiction in most of the watershed and the intersection of many of the issues associated with riparian conservation with several County departments, the County plays an important role in ensuring the future conservation of our riparian corridors.

While coordination of County departments with jurisdiction over activities occurring in riparian corridors has improved in recent years, without substantial and ongoing buy-in from the Board and affected County departments, successful development and implementation of a comprehensive conservation strategy for our riparian corridors will not be possible. Therefore, given the opportunity of the Vision Santa Cruz County process and the importance and complexity of riparian conservation, we recommend that the Board ask the County Administrative Officer and staff to include in the strategic planning process consideration of riparian conservation for all Santa Cruz County watersheds. Furthermore, we ask that this process be inclusive of input from the Fish and Wildlife Advisory Commission, the Commission on the Environment and the Water Advisory Commission as it evolves.

Thank you for your consideration of these important issues. Please do not hesitate to contact me if you have any questions or concerns about these comments.

Sincerely,

A handwritten signature in cursive script that reads "Carol Hamilton Monkerud".

Carol Hamilton - Monkerud
Chair - Water Advisory Commission

cc: FWAC, COE, CAO, John Ricker



COUNTY OF SANTA CRUZ

FISH AND WILDLIFE ADVISORY COMMISSION


701 OCEAN STREET, ROOM 312, SANTA CRUZ, CA 95060
(831) 454-3154 FAX: (831) 454-3128

March 5, 2018

Dear Planning Commission,

Thank you for considering the many comments that you have received on the cannabis cultivation ordinances. We would like you to consider our comments on the draft Environmental Impact Report that we submitted to the Board of Supervisors in October 2017. Our comments are attached. While some of the comments have already been addressed through the development of the ordinances, most of them are still relevant for shaping the final ordinances and the Best Management and Operational Practices (BMOP).

Sincerely,


Digitally signed by Chris Berry
DN: cn=Chris Berry, o=City of
Santa Cruz, ou=Watershed,
email=cberry@cityofsantacruz.c
om, c=US
Date: 2018.03.05 13:46:34 -0800

Chris Berry

Fish and Wildlife Advisory Commission Chair



Carol Hamilton-Monkerud

Water Advisory Commission Chair

cc: COE, Kristen Kittleson



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95060
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454-2123

October 11, 2017

Cannabis Comments c/o Matt Johnston
Planning Department
701 Ocean Street, 4th floor
Santa Cruz, CA 95060

Re: Comments on the Draft Environmental Impact Report (DEIR) for the Commercial Cannabis Cultivation and Manufacturing Regulations and Licensing Program

Dear Mr. Johnston,

Thank you for the opportunity to comment on this DEIR. It is obvious that staff have taken this complicated policy matter very seriously and considered the impacts of the various projects alternatives very thoroughly. Overall, the document has a high level of sophistication as a planning tool. While there are many aspects of the document that we are supportive of, we will limit our comments to those issues which we feel warrant clarification or further analysis:

- 1. Mapping/GIS analysis.** Many of the figures have inappropriately identified parcels for their respective role in a future licensing program. For example, City of Santa Cruz lands on Newell Creek are identified as being eligible for cultivation in Figure 2-6 and federal land in Bonny Doon is also identified as eligible for cultivation in other figures. Hopefully, the impacts analysis is not GIS-based. However, if the analysis is GIS-based, then it seems prudent to clarify and correct mapping errors and refine the environmental review.
- 2. Land use.** Commercial cannabis cultivation and the related concentrates manufacturing activities would be no different than other industrial agribusiness activities if not for its federally illegal status and the associated culture which has grown around illegal cultivation

since the 1970s. Rather than trying to impose rigorous licensing conditions upon operations that are inherently ill-suited to their current locations, primarily in the mountains, which the County plainly admits in this document that it is likely to be less successful than desired. Limiting this commercial activity to areas already dominated by agribusiness seems more appropriate. The existing infrastructure for cannabis-related activities is located in the mountains not only because the growing conditions are favorable there, but also because the illegal status and subsequently inflated value of cannabis over the decades has required defensible and secure cultivation locations. However, with cannabis now coming out of the legal shadows and the relatively new found ability to openly cultivate in greenhouses, an alternative would be to consciously move this activity into existing agribusiness-dominated areas of the County and out of mountainous areas, which provide other important functions for the County water supply, cold water fisheries, recreation, etc.

3. Alignment with state policies. Several of the standards in the County cultivation regulations are less stringent than policies already in place in other areas of the state. It is unclear to us what requirement the County has for conformance with these standards, but it seems rational that the County regulations ought to be at least as stringent as state standards. For example, mitigations for riparian buffer widths, water diversion forbearance season limits and the need for farm or water resource management plans are not well aligned with state standards.

SWRCB standards can be reviewed in more detail at the following links:

http://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/cannabis_boardworkshop_colorfullscreen.pdf

http://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/cannabis_go.pdf

http://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/staff_report.pdf

http://www.waterboards.ca.gov/centralvalley/water_issues/cannabis/general_order/r5-2015-0113_att_a.pdf

http://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/2015/15_0023_Cannabis_Order.pdf

Assuming the SWRCB will adopt relatively consistent standards statewide, mitigations regarding riparian buffer widths, water diversion and water resource management or farm management plans should be modified to be as protective as their respective state standards.

4. Market branding. Support of a market branding program similar to that used in Humboldt County would be an incentives-based method of protecting both the legacy of small “mom and pop” mountain grows and the natural resources potentially threatened by them in the mountain locations where they have historically farmed. While many of the

standards already proposed in the County's proposed regulations are equal to or superior to certified and branded cannabis from other jurisdictions, Santa Cruz County Certified branded cannabis could be developed as a mitigation and include more rigorous environmental protection standards than more traditional cultivation methods. These standards could include, but not be limited to:

- Organic only pest control methods
- Solventless concentrate manufacturing
- Educational requirements for licensees such as the "Master Gardener" program.
- Enhanced forest preservation, water use, erosion control and related standards
- Third party compliance inspections and certification

Some examples of such programs can be found at the following links:

<https://www.cleangreencert.org/>

<https://www.certified-kind.com/certified-kind-rules>

[http://mbmg.ucanr.edu/Learn To Be A Master Gardener/](http://mbmg.ucanr.edu/Learn_To_Be_A_Master_Gardener/)

5. Allowance for trucked water. Trucked water should not be allowed for any commercial cultivation activities. Not only does trucked water open up a new acreage to cultivation that might not otherwise be possible, the ability of the County (not to mention water purveyors) to oversee a trucked water program is highly speculative when consideration is given to the nuances of water rights, use tracking and related issues. Furthermore, we are not aware of any water purveyors who have analyzed this issue at a level of complexity that would allow for thoughtful accommodation for this new system demand through their Urban Water Management, drought contingency and other related plans.

6. Resource Conservation District role. Many of the proposed mitigations are not unique to cannabis and could very readily be implemented with the assistance of the Resource Conservation District of Santa Cruz County (RCD). The RCD commonly assists landowners with similar issues and is uniquely qualified to provide technical assistance to this sector of the agribusiness community as well. The RCD may be able to provide a unique role in certifying cultivation operations, given their vast experience with supporting agriculture and the objectivity that would come from their lack of pre-existing connections to the cannabis industry.

7. Impact AT-3. Considering all the environmental services that forestlands provide regarding retention of runoff, wildlife habitat, carbon sequestration and overall watershed functions and the fact that many of our watersheds support special status species and water

supply for the majority of County residents, the impact of forest conversion or rezoning of TPZ lands could be significant. Furthermore, vegetation community shifts due to climate change predicted by Point Reyes Bird Observatory¹ indicate that redwood forests may be severely limited in the County in the future, thereby exacerbating this issue. Including more rigorous mitigation for this impact such as prohibiting rezoning of TPZ parcels for commercial cannabis cultivation, prohibiting expansion of the agricultural use of TPZ zoned parcels for commercial cannabis cultivation or prohibiting all commercial cannabis operations on TPZ zoned parcels seems appropriate.

8. Impact Bio-1 – MM BIO-1.1b. Habitat Compensation. Many permitting authorities use a 3:1 ratio for mitigation rather than a 1:1 ratio. Consideration of a more rigorous mitigation bank concept seems appropriate given the scale of impacts associated with this project. Implementation of any such program will obviously be very challenging and success may be a speculative, remote possibility. That said, leveraging this mitigation to provide improvements on other public lands, which currently have insufficient resources to do so (State Parks, County Parks, etc.) and habitat mitigation banking criteria that have enough flexibility to trade impacts in upland areas for mitigation in riparian areas, for example, may help facilitate the success of this mitigation.

9. MM BIO-1.1h. Water Draw Restrictions. We strongly support this mitigation, however it is not entirely consistent with state standards, nor will it necessarily be entirely protective of instream flows and related aquatic biota. The SWRCB is currently proposing a surface water forbearance period of April 1 – October 31. If it is determined that groundwater diversions have the potential to significantly affect surface water supply, forbearance periods may extend to groundwater diverters as well. In Santa Cruz County there are also instream flow problems during the winter period in some creeks, particularly during drought periods. Aligning this mitigation with state standards and protecting non-forbearance period instream flows during drought would make this mitigation more rigorous. Of course, water rights validated by the SWRCB and Streambed Alteration Agreements for any surface water diversions will also be necessary to make this mitigation meaningful.

10. MM BIO 4.2. No Cannabis Activities allowed within Sandhills Habitat or Salamander Protection Zone. We strongly support this mitigation as well. It is notable that this mitigation may also serve as mitigation for hydrologic impacts by reducing the groundwater pumping associated with the project in overdrafted groundwater basins such as the Santa Margarita groundwater basin.

¹ <http://data.prbo.org/cadc2/index.php?page=154>

11. MM BIO-4.1. Avoidance of Conflict with an Approved HCP. It is likely that the City of Santa Cruz will have an approved Anadromous Salmonid HCP that includes instream flows for the San Lorenzo River, Newell Creek, Laguna Creek, Liddell Creek and Majors Creek within the next two years. Any licenses granted subsequent to that time in these watersheds should not include allowance of activities which affect instream flows or otherwise affect aquatic habitat to the extent that there are conflicts with implementation of this HCP. This may also be true for other water purveyors such as the San Lorenzo Valley Water District or other San Lorenzo River tributaries in the future.

12. Impact HYDRO-1. Commercial cannabis cultivation under the Program could introduce sediment and other pollutants to surface flows and groundwater, which would cause water resource contamination. With mitigation, this impact would be less than significant. The County is already considering karst protection language for several existing regulations and inclusion of karst protection standards in commercial cannabis cultivation regulations and mitigation measures in this EIR seems appropriate as well. Given that several public and private water sources are located adjacent to “M” zoned parcels in karst terrain where commercial cultivation appears to be possible, the impact is currently not sufficiently mitigated. These standards could include but not be limited to:

- Site-specific geologic investigations
- Setback for any structures, roads and manufacturing from sinkholes or other karst features.
- Routing drainage away from karst features

See the following link for more information on this issue:

http://santacruzcountycalocalityca.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=2578&highlightTerms=karst
<https://www.americangeosciences.org/sites/default/files/karst.pdf>

13. Impact HYDRO-2. Commercial cannabis cultivation under the Program could adversely affect groundwater supplies and groundwater recharge. This impact would be less than significant with mitigation. The additional water demand posed by allowance of tankered water, groundwater pumping and diversion of surface water, particularly during drought during both the wet and dry seasons, are not exhaustively analyzed in this document, nor have they been analyzed by local water purveyors. Therefore the impacts cannot be well-understood at this time. Furthermore, new greenhouse construction could potentially increase runoff rates and reduce groundwater recharge, though it is not clear what analysis has been conducted to characterize this issue and provide commensurately appropriate mitigation in the DEIR. This has been a significant issue in other groundwater basins,

particularly the Oxnard Plain, where greenhouse-based cultivation practices have replaced row crops or other agricultural practices that do not result in development of landscape-scale impervious surfaces. Given the existing dire situation with water supply in the County and the mitigations currently proposed, it seems speculative to say that the impact is less than significant with mitigation. Further analysis of the demand posed by the program would facilitate a more rigorous discussion of the true impacts on water utilities.

14. MM-HYDRO-2.1. Water Efficiency for Cannabis Cultivation. While we strongly support this mitigation, implementation success of the mitigation will take an ongoing, long term commitment and significant resources. The success of such a mitigation may be enabled by the involvement of a third party such as the Resource Conservation District. Again, RCDs have a long history of success with such programs. Furthermore, this mitigation measure would be much more successful if it included a requirement for metering groundwater pumping.

15. MM HYDRO-2.3. Water Tank Supply Management. It is not clear if this mitigation applies to water used for irrigation as well as water used for firefighting purposes. However, as previously mentioned, we support the surface water forbearance period for water diversion and tank filling. However, there may be non-forbearance period flow issues to consider and consistency with SWRCB standards that need further consideration in development of this mitigation. Obviously, the standards for the County's program will need to parallel the state standards, if only because state permits are required for water diversions.

16. Impact HYDRO-4. Commercial cannabis manufacturing under the Program would result in a less than significant effect with mitigation on the introduction of sediment and other pollutants to surface flows and groundwater, and on the groundwater supplies and groundwater recharge. This impact would be less than significant with mitigation. The County is already considering karst protection language for several existing regulations and inclusion of karst protection standards in commercial cannabis cultivation regulations and mitigation measures in this EIR seems appropriate as well. Given that several public and private water sources are located adjacent to "M" zoned parcels in karst terrain where commercial manufacturing appears to be possible, the impact is currently not sufficiently mitigated. These standards could include but not be limited to:

- Site-specific geologic investigations
- Setback for any structures, roads and manufacturing from sinkholes or other karst features.
- Routing drainage away from karst features

See the following links for more information on this issue:

http://santacruzcountyca.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=2578&highlightTerms=karst
<https://www.americangeosciences.org/sites/default/files/karst.pdf>

17. Impact UE-1. The Program could increase demand or result in the expansion of facilities for water, wastewater, or solid waste services within the County due to licensing of commercial cannabis cultivation and product manufacturing activities. This impact would be less than significant with mitigation. The additional water demand posed by allowance of tankered water, groundwater pumping and diversion of surface water (particularly during drought during both the wet and dry seasons) are not exhaustively analyzed in this document, nor have they been analyzed by local water purveyors. Therefore the impacts cannot be well-understood at this time. Given the existing dire situation with water supply in the County and the mitigations currently proposed, it seems speculative to say that the impact is less than significant with mitigation. Further analysis of the demand posed by the program would facilitate a more rigorous discussion of the true impacts on the water supply

18. Sustained (and enhanced) enforcement program. The most permissive alternative may be the most expedient way to get operations into the licensing program, but it seems like a logical stretch to say that it is therefore the environmentally superior alternative. The County will have serious challenges with program implementation on licensed grows and especially with enforcement on unlicensed grows with any project alternative. As the DEIR itself states, it is quite likely that, even with the most permissive project, illegal grows will be rampant due to the complexity of the license process, perceptions of excessive taxation, temptation of illegal out of state markets and related issues. These illegal grows operating in the shadows of legal grows will be even more difficult to enforce if they are scattered county-wide and the standards for legal grows are so low that differentiating between legal and illegal grows is challenging. Furthermore, while our recent experience with County Code Compliance has been mostly positive, it has also been our experience over the years that frequently there have been times when there were insufficient resources for Code Compliance to be adequately responsive to enforcement needs. At the very least, dedication of cannabis licensing and sales-related tax revenue should be implemented to help ensure some long-term viability of an enforcement program that is commensurate with the scale of the industry in the County, be it legal or not. Without this assurance, given the history of Code Compliance, the complex nature of the cultivation regulations and the scale of potential illegal cultivation under any project scenario, it seems somewhat speculative to conclude that impacts will be mitigated to a “less than significant with mitigation” level by a sustained and enhanced enforcement program.

Thank you for your consideration of these important issues. Please do not hesitate to contact me if you have any questions or concerns about these comments.

Sincerely,

A handwritten signature in cursive script that reads "Carol Hamilton Monkerud". The signature is written in dark ink and is positioned below the word "Sincerely,".

Carol Hamilton - Monkerud
Chair – Water Advisory Commission

cc: FWAC, COE, John Ricker