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To Humboldt Board of Supervisors
From: Bonnie Blackberry (CLMP)
For: August 10, 2021
RE: Drought Task Force Report

Supervisors,

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My first reaction to the Drought Task Force Report was the realization that the county isn't going to recommend any changes to what's going on. Keep busting the illegal water diverts while continuing to permit more large cannabis grows, which require massive amounts of water.

The Drought Task Force was established on May 25, 2021. It is now August and the situation is getting worse, no surprise. Many people were expecting that the Task Force would have some recommended actions to be taken, besides warnings about public health impacts, while continuing to explore and develop actions, and continue tracking local drought impacts.

The previous Drought Task Force Report (July 20, 2021) included recommendations to consider a moratorium on new non-domestic wells and curtailing cannabis cultivation for any cultivator that doesn't have sufficient stored water to start a new cycle. Those recommendations were withdrawn and rejected, and now, as we slide deeper into the drought, the plan seems to be continue business as usual, continuing permitting more cannabis grows with multiple crops relying on groundwater wells, without sufficient evidence of the groundwater conditions and impacts to other wells and surface waters.

In my watershed there is much more cannabis being grown than there was back in 2016. Most, if not all of the illegal grows have been abated, yet currently there is much more water being used by the permitted, multi cycle operations, than was used by the illegal grows. Many creeks have already dried up, along with springs and wells dropping, with some becoming "unproductive". The drought, plus the increased water use in many of our upland watersheds is compounding the problem.

Most of the cannabis cultivation permits that have been approved this year, or are up for approval, rely on groundwater wells with no forbearance requirement. For example, on July 29th, the Planning Commission had seven (7) permits relying on approximately 1,487,600 gallons of groundwater from wells, with only approximately 306,575 gallons (less than 1/4) of storage, when an unknown amount of well water has already been delegated for use in those watersheds located in areas of southern Humboldt that are categorized as in "severe drought".

Apparently the county's position is since the groundwater isn't visible, and it's an unknown, so keep on pumping as if all is well. Let's just continue observing and examining the impacts and come up with some recommendations for mitigation and response actions to be taken at some future date.

Meantime, I question how bad the situation needs to get before you, the Board of Supervisors, do take action. Garberville Water District stopped water to commercial agriculture customers last week because of the low flow in the Eel River. Other water districts are cutting back due to low flows. From my perspective time is a critical factor. You are not going to be able to ship in bottled water for the wildlife, or revive the dead fish.

Sincerely concerned,
Bonnie Blackberry
Civil Liberties Monitoring Project rep