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Date: June 12, 2025

To: The Honorable Lake County Planning Commission

From: Peggie King, Environmental Professional, Kelseyville

Subject: Consideration of Summary of Cannabis Policy Recommendations and Request for Planning Commission Recommendation(s)

I have worked in the environmental field for about 30 years. Partly as a Lake County employee (12+years) and in the private sector for a few large corporations. Most of my work has been in California, where I specialize in understanding and advising on complex environmental regulations with an emphasis on water resources. I worked in cannabis for a former grower and processor in Lake County for about 8 months and am familiar with the business and environmental issues.

I would like the Planning Commission and subsequently the Board of Supervisors to consider including the following bullet points in the subject discussion item, if possible, to address a few environmental concerns related to water resources.

Below is a very brief list of concerns:

Be aware of the Sustainable Groundwater Management Act (SGMA) and potential future consequences of overdraft in groundwater basins that are not presently on the high priority list, yet could be in the future if the water resources are not carefully considered and managed. SGMA requires local agencies to address undesirable impacts of over pumping to bring groundwater basins into balance. The Big Valley Groundwater Basin is currently the only basin that is regulated by SGMA and maybe it is very costly to the county and citizens.

The county policies/ordinance should address the current required Hydrology Reports to be consistent and include a minimum amount of information, perhaps a report template could be provided to the project proponent. The Hydrology Reports need to be accurate, clear, concise and fact based. Stating that a cannabis plant uses as much water as a tomato plant is vague and does not quantify the use based on factual evidence, as it should, in order to demonstrate sustainability. Groundwater well pump times should be conducted for 24 consecutive hours to accurately reflect the drawdown and recovery of the well. In some areas, well production is very low (e.g., 10 gpm) and that may necessitate around the clock watering for a commercial grow.

Groundwater wells close to creeks/streams could be considered under the influence of surface water. Surface water includes all groundwater sources that are deemed to be under the influence of surface water such as springs,

shallow wells, and wells close to rivers. This condition needs to be better

understood with regards to water rights and regulated waterways such as Putah Creek and particularly with regards to groundwater recharge. In California, groundwater wells that are influenced by surface water may require a water right from the State Water Resources Control Board depending on the specific circumstances and well location. This is a complex issue that does not appear to be well understood within the Hydrology Reports that I have read associated with proposed cannabis projects.

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