

## Comments to the Humboldt County GPU Draft EIR

Thank you for taking the time to read my comments.  
Donald Courtemanche  
Sprowel Creek Road, Garberville. Concerned citizen.

### WATER;

The northern and eastern parts of Humboldt County have excess water but in the area around Garberville there are many critical issues with water not addressed in the GPU/ Draft EIR.

The South Fork Eel River is a Wild and Scenic River, a living organism protected by state and federal laws. It is also the home to many threatened and endangered species and it is the life's blood for the communities of the watershed. This river is deeply troubled.

The planning commission and the planning department staff have overlooked many crucial aspects by considering the Water Element at the end of the GPU planning process rather than at the beginning.

1. The South Fork Eel River is "fully appropriated" (Jane Arnold DFG 2009).
2. Not considered in this statement or the Draft EIR is existing water usage by hundreds of illegal water draws from the South Fork Eel by marijuana farms and green houses.
3. Marijuana is by far the largest user of water in our area, it is even trucked from watershed to watershed out of the South Fork Eel unregulated.
4. The hundreds of semi-trucks with thousands of bags of unregulated soil amendments, fertilizers and pesticides that are being delivered in our area amounts to millions of gallons of runoff into our rivers and streams during the wet season.

5. 1. **POLICIES** Ensure that land use decisions are consistent with the long term value of water resources in Humboldt County. 4. Existing water uses shall be considered during the review for new water uses. *Humboldt County General Plan Update Natural Resources and Hazards* 5. The availability of groundwater should be used as a prime factor in determining the desirable amount of residential development in a particular area in order to protect groundwater resources from depletion or contamination.

Marijuana growing is an existing water use and the cumulative impacts must be considered in the GPU/EIR.

6. The South Fork Eel went underground in 2009 at the Miranda Bridge. This river gets choked with algae blooms in the summer months that kills dogs and has caused health and safety warnings to be issued by our county.

Yet section WR-PX1 of the Draft EIR will allow water from the South Fork Eel to be used by the Mattole watershed in emergency low flow events sacrificing the South Fork Eel to support the development in the Mattole Watershed. Water storage and capture is a fine theory but it is unproven and experimental. It cannot and be used as a mitigation.

The major issue not addressed in the Draft EIR are, the number of illegal and legal water diversion for marijuana production from the South Fork Eel watershed. The legal diversions come from inside the local service districts in the form of increased water use. But the real problem is the number of illegal water draws from the entire South Fork watershed.

The reason I pointed out the number of trucks delivering soils amendments and pesticides to our area is to show the size of this industry and the sedimentation deposited in all of the Humboldt County's rivers and streams as a result of these unregulated sales and imports.

Humboldt County or the State could require the soil retailers and wholesalers to account for the number of tons or bags sold in our county and then figure the amount of water needed for each ton or bag.

Thanks for your time in this matter.

Donald Courtemanche

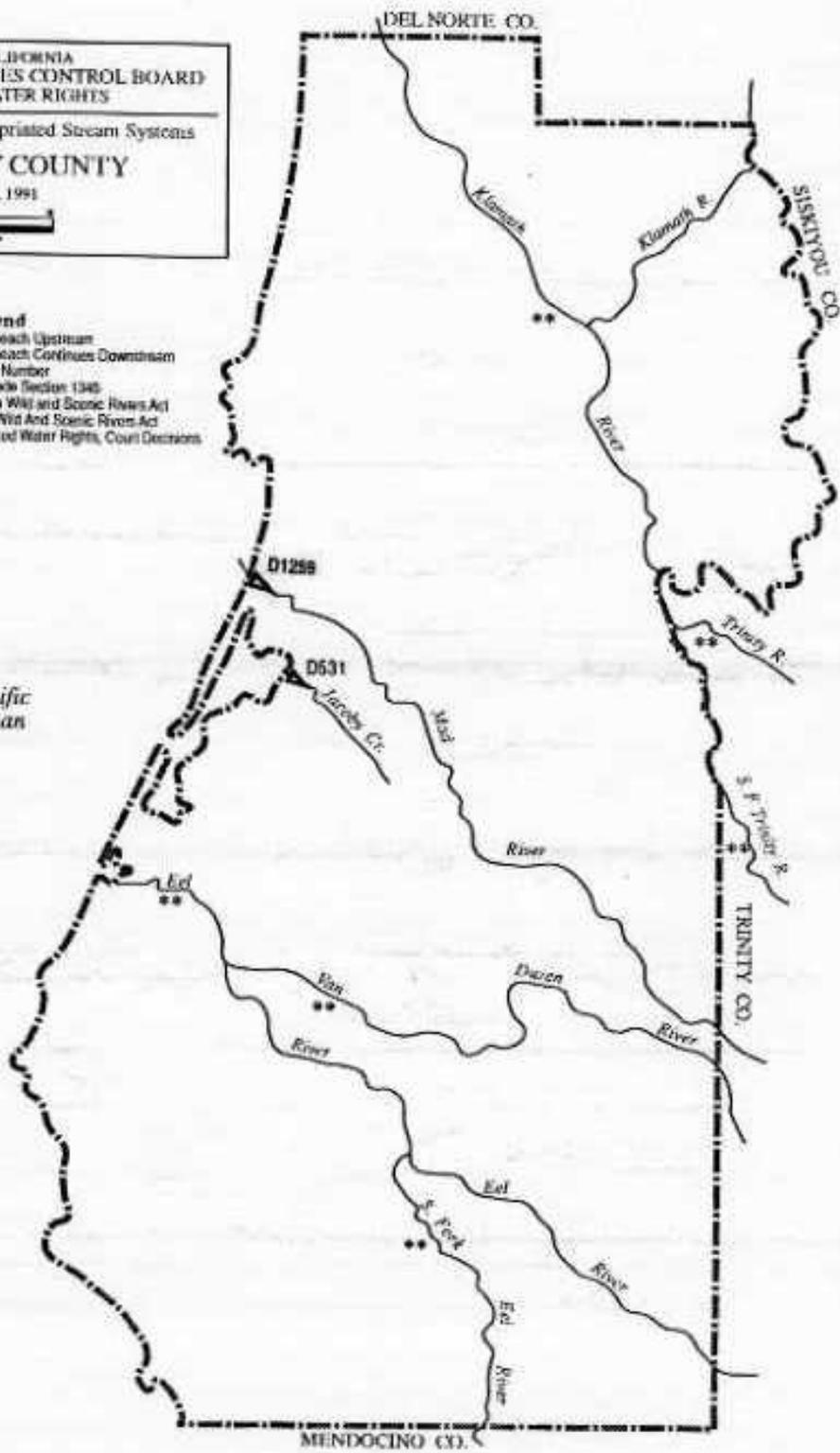
STATE OF CALIFORNIA  
 STATE WATER RESOURCES CONTROL BOARD  
 DIVISION OF WATER RIGHTS  
 Declaration of Fully Appropriated Stream Systems  
**HUMBOLDT COUNTY**  
 August 22, 1991  
 REVISED 1999



- Legend**
- ▲ Critical Reach Upstream
  - ▼ Critical Reach Continues Downstream
  - Decision Number
  - Water Code Section 1346
  - California Wild and Scenic Rivers Act
  - Federal Wild and Scenic Rivers Act
  - 0000 - Adjudicated Water Rights, Court Decisions



Pacific Ocean



*POLICIES*

1. Ensure that land use decisions are consistent with the long term value of water resources in Humboldt County.
2. Regulate development that would pollute watershed areas.
3. Ensure that the intensity and timing of new development will be consistent with the capacity of water supplies.
4. Existing water uses shall be considered during the review for new water uses. *Humboldt County General Plan Update Natural Resources and Hazards* 5. The availability of groundwater should be used as a prime factor in determining the desirable amount of residential development in a particular area in order to protect groundwater resources from depletion or contamination.
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6. Projects must provide evidence of water availability prior to recordation of map.
7. Maximize the use of water conservation techniques appropriate for new and existing development.
8. Continue participation in all state, regional or local water resource planning efforts effecting surface run-off or groundwater supplies.
9. Encourage further investigation on the County's water resources by federal and state water resource agencies.
10. Large water export projects will not be approved or supported unless specific requirements and assurances are satisfied. These shall include the 1978 water policy statement policies regarding "Water Export Projects on Humboldt County Streams". (See Standards 5a-1)
11. Support flow release schedules from existing reservoirs that maintain or enhance the fisheries of those rivers.
12. Support the development of fisheries enhancement projects on small Humboldt County streams.
13. Ensure that projects located within state designated wild, scenic or recreational river basins are consistent with the guidelines in the State Wild and Scenic Rivers Act (as amended).
14. The development of environmentally sound small hydroelectric projects on publicly and privately owned lands in Humboldt County is generally encouraged. The County should only examine small hydroelectric project proposals for impacts not reviewed by other agencies and for overall consistency with the intent of the General Plan.