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#### Institutional/Educational Membership

Groundwater Resources Assn of CA  
Lawrence Berkeley National Laboratory

#### Legislative Advocate

**Rosanna Carvacho**  
Clear Advocacy

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June 22, 2022

The Honorable Thomas J. Umberg  
Chair, Senate Judiciary Committee  
1021 O Street, Room 3240  
Sacramento, CA 95814

#### RE: AB 2728 (Smith) – SUPPORT

Dear Senator Umberg,

On behalf of the California Groundwater Coalition (CGC), I write to express our support for AB 2728 (Smith) which would increase the civil penalties for unlicensed cannabis operations from three times the required license fee to four times the required license fee.

CGC was formed at the urging of California state and local officials who believed that increased efforts were needed to educate and inform policy makers and the public about California groundwater resources. CGC members include public and private groundwater management entities located throughout California and consist of experts with technical, legal, and professional groundwater and related expertise.

Illegal cannabis grows are a serious, growing threat across rural areas of California. CGC members have seen illicit cannabis cultivators engage in the theft of large amounts of water and create environmental pollution due to the use of illegal pesticides.

California penalties are not strong enough to deter criminals from engaging in widespread illegal cannabis farming, nor does it recognize the danger illegal grows pose to water supply and groundwater pollution. Illegal cannabis farmers frequently break water pipes and infrastructure to steal water or dig unpermitted, illegal wells to tap groundwater.

Additionally, the widespread use of dangerous and deadly pesticides at illegal cannabis farms can be lethal to both humans and wildlife, posing immediate and long-term risks to those working in and near these sites. Moreover, the use of unlicensed pesticides can pollute limited groundwater supplies, rendering the water unfit for drinking.

For these reasons, CGC is in support of AB 2728 and respectfully requests your “AYE” vote when this bill comes before you. If you have questions about CGC’s position please contact our Legislative Advocate, Rosanna Carvacho Elliott at 916-479-7400 or [rosanna@clearadvocacy.com](mailto:rosanna@clearadvocacy.com).

The Honorable Thomas J. Umberg

June 22, 2022

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Sincerely,

A handwritten signature in blue ink, appearing to read "Ann DuBay". The signature is fluid and cursive, with the first name "Ann" and last name "DuBay" clearly distinguishable.

Ann DuBay

President, California Groundwater Coalition

cc: Honorable Members, Senate Judiciary Committee  
The Honorable Thurston Smith