

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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September 6, 2017

State Water Resources Control Board
Clerk to the Board
Attn: Jeanine Townsend
P.O. Box 100
Sacramento, CA 95812-0100

RE: Comment Letter – Cannabis Policy and Staff Report

Dear Board Members:

The California Office of Historic Preservation (OHP) submits the following comments on the Draft Cannabis Policy available on the State Regional Water Quality Control Board's (SWRCV) Cannabis Cultivation web page. Pursuant to the National Historic Preservation Act and the California Public Resources Code, the State Historic Preservation Officer (SHPO) and the OHP have broad responsibility for the implementation of federal and state historic preservation programs in California.

Regarding Requirement 19 in Section 1: General Requirements and Prohibitions of Attachment A to the Draft Policy:

The meaning of the term "CHRIS potential discovery" is unknown. California Historical Resources Information System (CHRIS) records searches conducted by or for qualified archaeologists (or other qualified professionals) contain information about known recorded cultural resources - including, but not limited to, "historical resources" as defined in CEQA, and including, but not limited to, archaeological cultural resources. These searches may be used to assess the likelihood of unrecorded cultural resources in the vicinity of the search area as well. As such, combining "CHRIS" and "potential discovery" into a single term is unclear. Please define the term "CHRIS potential discovery" or rewrite the language so that the requirement is understandable.

The term "CHRIS qualified archaeologist" is unknown. The CHRIS access policy includes professional qualifications for archaeologists and other specialists associated with cultural resource management when using the CHRIS only. It is not a professional qualifications standard outside of that context. Also, there is a separate set of qualifications for a "professional archeologist" used and defined elsewhere in this section. The concern is with the potential misconception that the CHRIS certifies individuals as qualified to conduct archeological research in California - it does not - and that the inclusion of two possibly similar terms might cause confusion. Please define the term "CHRIS qualified archaeologist" or rewrite the language so that the intent is understood.

State Water Resources Control Board
September 6, 2017
Page 2 of 2

If you have questions for this office, please contact Eric Allison, CHRIS Coordinator, at (916) 445-7044 or eric.allison@parks.ca.gov.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'J' followed by a horizontal line extending to the right.

Julianne Polanco
State Historic Preservation Officer