

**State Water Resources
Control Board**

**Cannabis Cultivation
Policy
and
General Order**

October 17, 2017
Board Meeting Items 6 & 7
State Water Resources Control Board





Presentation Outline

- Background
- Water Boards' Responsibilities
- Overview of Potential Impacts of Cannabis Cultivation Activities
- Cannabis Small Irrigation Use Registration
- Timeline and Outreach and Coordination
- Overview of Proposed Cannabis Policy
 - Staff Report
 - Peer Review
 - Cost Analysis
- Overview of Cannabis General Order
- Public Comment Period, Comments Received, and Responses to Comments



Background

- Three bills adopted in 2015 – Assembly Bills (AB) 243 and 266; Senate Bill (SB) 643 (MMRSA)
- SB 837 adopted in June 2016 – included clean up language for three 2015 bills (MCRSA)
- Proposition 64 passed November 2016, allowing recreational cannabis use for adults (AUMA)
- SB 94 adopted June 2017 – consolidated provisions of MCRSA and AUMA and established the Medicinal and Adult-Use Cannabis Regulations and Safety Act (MAUCRSA)



State Water Board Responsibilities

“The state board or appropriate regional board shall address discharges of waste resulting from cannabis cultivation under [MAUCRSA] and associated activities, including by adopting a general permit, establishing waste discharge requirements...”

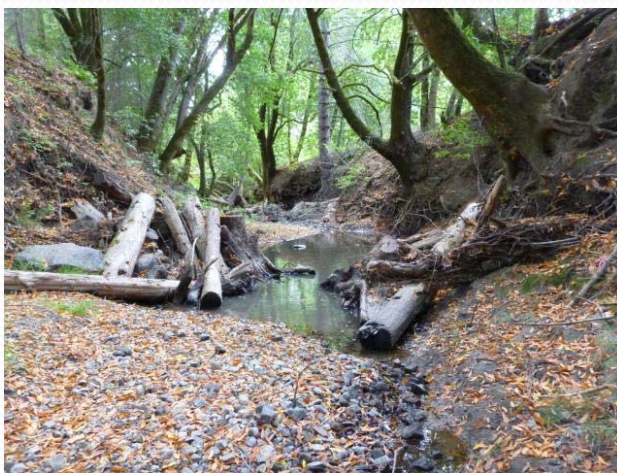
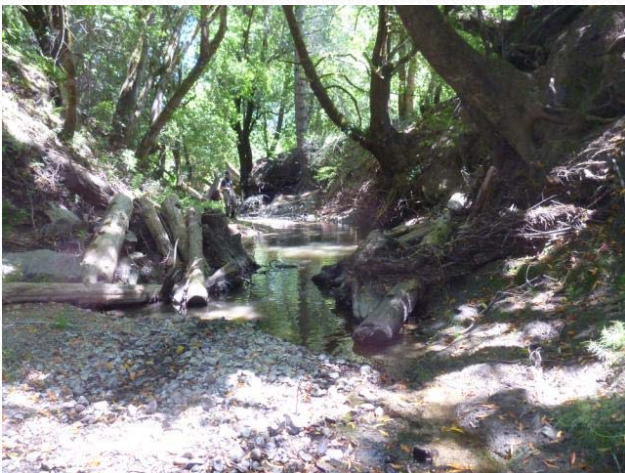
Water Code Section 13276(b)

State Water Board Responsibilities

(continued)

Ensure individual and cumulative effects of water diversion and discharge associated with cannabis cultivation do not affect instream flows needed for fish spawning, migration, and rearing, and flows needed to maintain natural flow variability

Business and Professions Code Section 26060.1(b)(1)



State Water Board Responsibilities

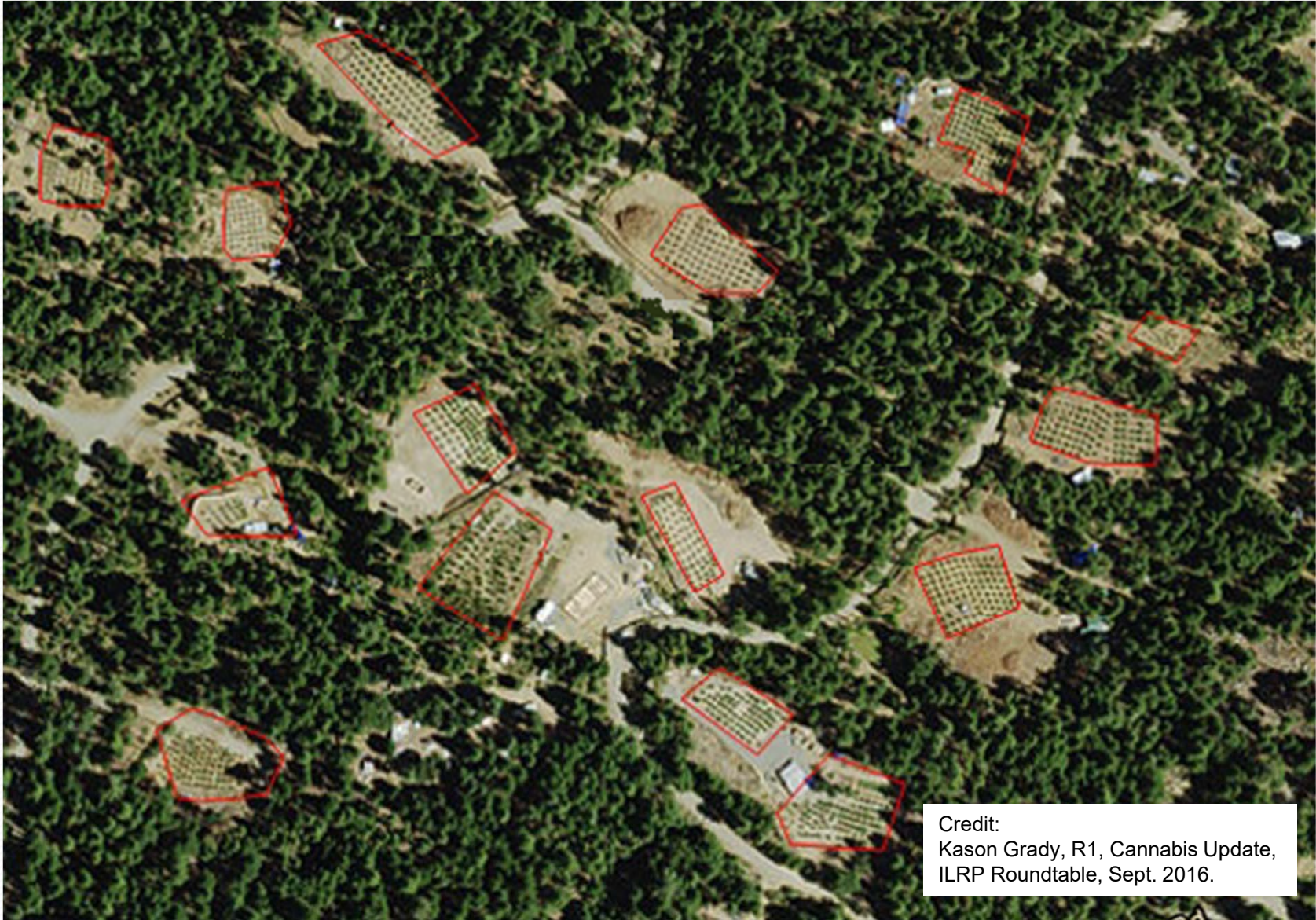
(continued)

- Develop policy for water quality control to establish principles and guidelines (requirements) for cannabis cultivation:
 - Shall include measures to protect springs, wetlands, and aquatic habitat from negative impacts of cannabis cultivation
 - May include requirements for groundwater extractions



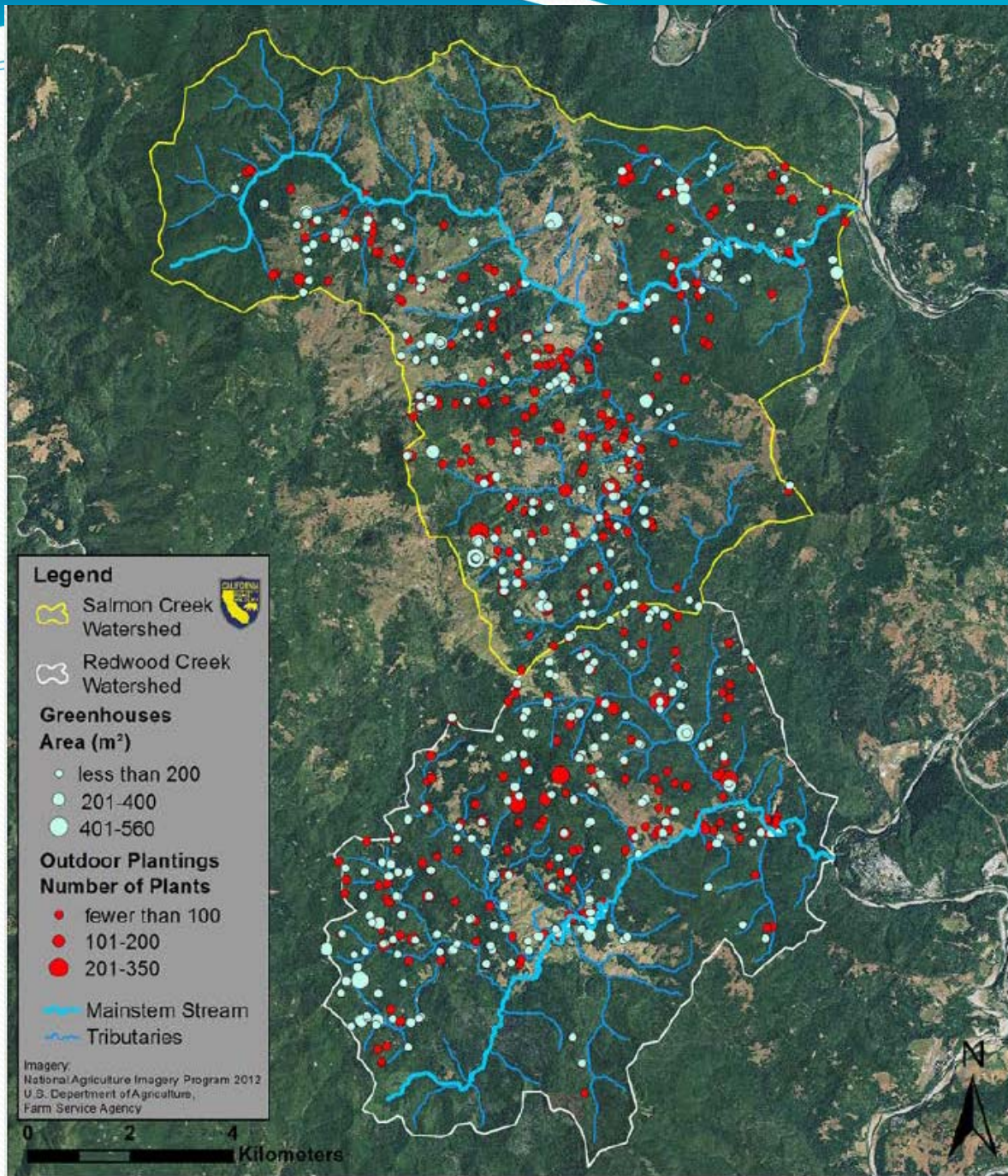
Water Code Section 13149(a)(1)(A)

Cannabis Cultivation Activities



Credit:
Kason Grady, R1, Cannabis Update,
ILRP Roundtable, Sept. 2016.

Cumulative Impacts



Credit:
Kason Grady, R1, Cannabis
Update, ILRP Roundtable,
Sept. 2016.

Road Building Activities



Credit:
Kason Grady, R1, Cannabis Update,
ILRP Roundtable, Sept. 2016.

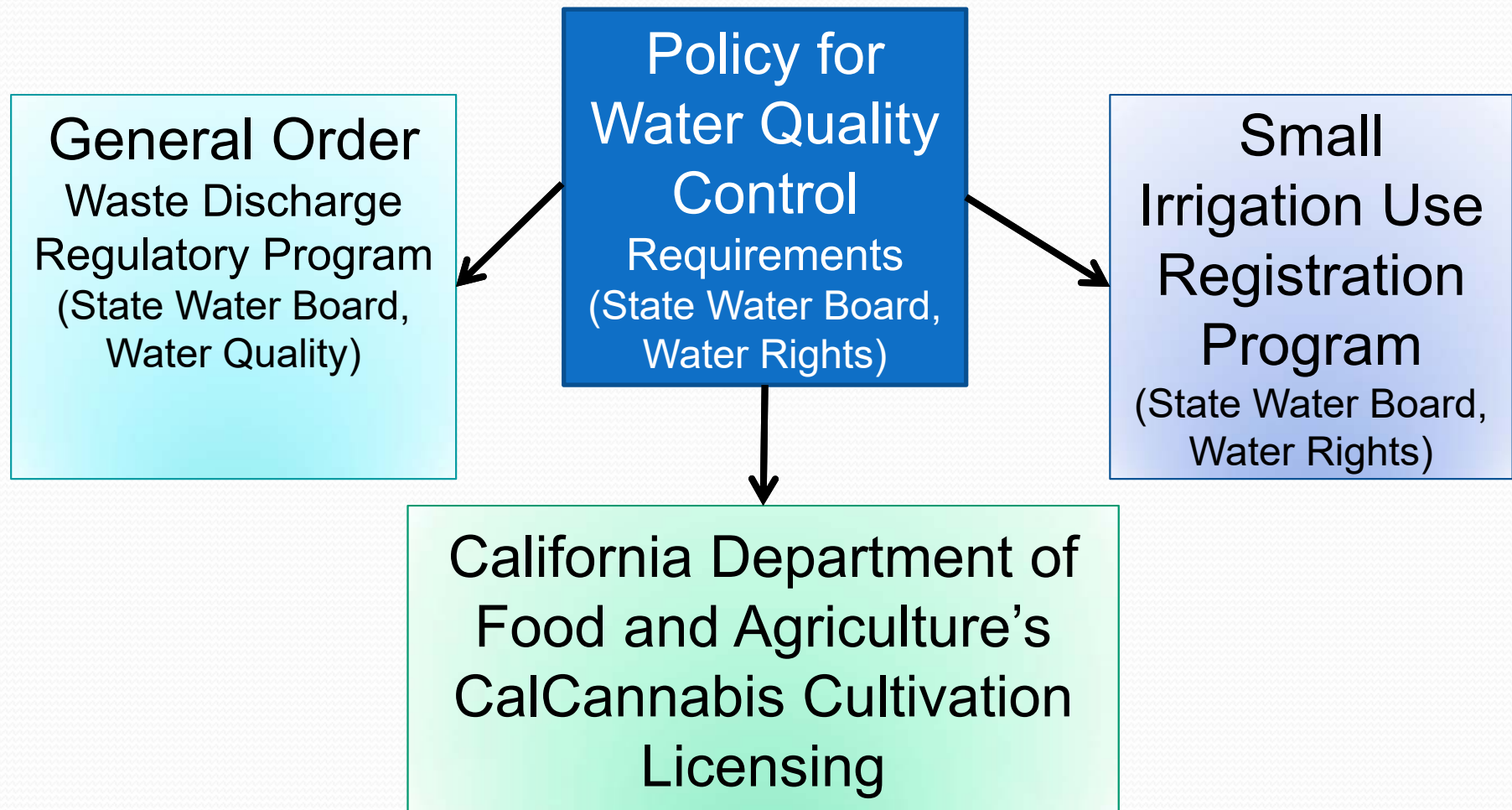
Sediment Runoff in Fish-bearing Stream



Water Diversion Impacts



Cannabis Policy Regulatory Flow





Small Irrigation Use Registration Program

- Statewide Cannabis Small Irrigation Use Registration (SIUR) will be available after Policy approval by Office of Administrative Law, expected late fall 2017
 - SIURs are applicable to irrigated crops for sale or trade, including commercial cannabis cultivation once general conditions are adopted.
 - Accessible through same portal as enrollment under General Order
- Existing water diverters should continue to file appropriate water rights paperwork until cannabis registration is available
 - Only for surface water diverters
 - Cannabis cultivators whose water is sourced from groundwater, municipal systems, and rainwater capture do not need to file with Division of Water Rights



Small Irrigation Use Registration Program

- Cannabis Small Irrigation and Use Registrations, like other appropriative water rights:
 1. will not be issued for fully appropriated streams in the restricted diversion season;
 2. may not be available on rivers and streams designated as Wild and Scenic under The National Wild and Scenic Rivers System;
 3. are not available where the water source is in a CDFW Instream Flow Study area with a final flow recommendation from CDFW (Public Resource Code section 10002).

Outreach and Coordination

State Agency Outreach

- Regional Water Quality Control Boards, California Department of Fish and Wildlife, California Department of Food and Agriculture, and Department of Pesticide Regulation

Public Outreach

- 8 public outreach meetings to solicit comments on Policy development – August 31 - October 4, 2016 (throughout CA)
- Calaveras County Water District Meeting – September 28, 2016 (Andreas)
- Siskiyou County Board of Supervisors Meeting – October 4, 2017 (Yreka)
- North Coast Regional Board Meeting – October 20, 2016 (Santa Rosa)
- North Coast Watersheds Science and Management Exchange Program – February 2, 2017 (Douglas City)
- California Water Action Plan Meeting – February 8, 2017 (Briceland)

Outreach and Coordination (cont.)

- American Fisheries Society Conference – April 7, 2017 (Eureka)
- Mendocino County Permit Meetings – April 19, 2017 (Laytonville and Willits)
- Association of CA Water Agencies, Northern CA Water Association, Farm Bureau, wine stakeholders, water rights stakeholders – May 25, 2017
- CA State Association of Counties, Humboldt County Regional Meeting – June 29, 2017 (Eureka)
- California Department of Food and Agriculture DEIR Public Meetings – July 11-20, 2017 (throughout CA)
- CA Growers Association Meetings – July 29, 2016; January 18, 2017; and July 10, 2017 (Sacramento)
- Two public information meetings for the Draft Policy and Draft General Order – July 20, 2017 (Eureka) and July 27, 2017 (Sacramento)
- State Water Board Workshop – August 2, 2017
- Santa Cruz County State Cannabis Licensing Workshop – September 14, 2017



Tribal Outreach/Consultation

- April 4, 2017 – Letters sent to tribes throughout California soliciting input on proposed condition
 - 16 comment letters received from tribes, with five tribes requesting consultation
 - Meetings held to discuss concerns
 - Karuk Tribe – August 1 (Orleans)
 - Blue Lake Rancheria, Yurok Tribe, Karuk Tribe, Bear River Band of Rohnerville Rancheria, Hoopa Tribe, Wiyot Tribe – September 26 (Blue Lake)
- Tribal cultural resource conditions have been modified based on comments
- Consultation will continue, as needed, to inform potential future updates to the Policy and General Order



Timeline

- Draft Policy, Staff Report, and General Order released for public comment: July 7, 2017
 - Public Comment Period Ended: September 6, 2017
- Informational Workshops:
 - July 20 – Eureka
 - July 27 – Sacramento (webcast)
- State Water Board Workshop: August 2, 2017 (Sacramento)
- **Hearing on Adoption: October 17, 2017**
- Submittal of Policy to Office of Administrative Law (OAL): October 2017 – Sacramento
- Policy and General Order Effective: Upon approval by OAL – anticipated late November/early December



Proposed Cannabis Policy and General Order

Focus of this presentation is documents that are proposed for Board hearing and adoption:

- Cannabis Policy:
 - Policy describes overall structure of Board's proposed cannabis cultivation regulatory program, water quality and instream flow requirements
 - Policy is categorically exempt from CEQA, provided it does not relax standards.
 - Class 8 action under CEQA – action taken by regulatory agency for protection of environment within regulatory process
- Draft Cannabis General Order – includes tier structure, fee structure, and environmental management plans

Cannabis Cultivation Policy

(Principles and Guidelines for Cannabis Cultivation)

- Main Document
- Attachment A: Cannabis Cultivation Requirements
 - Section 1 – Definitions, General Requirements, and Prohibitions
 - Section 2 – Requirements for Water Diversion and Waste Discharge (10 subsections)
 - Section 3 – Numeric and Narrative Instream Flow Requirements
 - Section 4 - Watershed Compliance Gage Assignments
 - Section 5 – Planning and Reporting
 - Section 6 – Useful Guidance Documents



Cannabis Cultivation Policy

(Main Document)

- Provides overview of Water Boards' program and context for how it fits in with other cannabis regulatory programs
- Establishes 14 regions throughout state for instream flow requirements
- Continuing authority to amend Policy
- Describes how the Policy will be enforced

Map of Regional Boundaries



Cannabis Cultivation Policy (Enforcement)

- Enforcement of Policy requirements will be handled through various Water Boards authorities, including water rights, water quality, and public trust
- Appropriate penalties and other consequences for violations prevent cultivators that do not comply with requirements from obtaining an unfair competitive advantage and help ensure public confidence in regulatory framework
- Existing enforcement efforts such as Watershed Enforcement Team will continue as well



Cannabis Cultivation Policy

(Definitions, General Requirements, and Prohibitions)

Rules and authorities applicable to all cultivators, including:

- Right of access by agencies to inspect for compliance
- Laws about tribal lands and cultural resources
- General water quality rules such as riparian setbacks, limitations on slope of land being disturbed
- Cannabis General Water Quality Certification

Cannabis Cultivation Policy

(Requirements for Water Diversion and Waste Discharge)

Specific requirements for cultivation activities, such as:

- General erosion control measures for entire cultivation site
- Stream crossings and installation, culverts, road development
- Management of fertilizers, pesticides, and petroleum
- Cleanup, restoration, and mitigation on existing sites
- Proper soil, cultivation, and human waste disposal
- Control of irrigation runoff
- Appropriate methods of water diversion and storage
 - Maximum diversion rate: 10 gallon per minute (unless otherwise approved in existing water right)
- Winterization



Cannabis Cultivation Policy

(Numeric and Narrative Instream Flow Requirements)

Narrative Instream Flow Requirement:

- 50% of streamflow shall be bypassed past point of diversion
- Surface water forbearance period: April 1 – October 31, possibly later depending on precipitation (initial diversion before December 15 may not commence until after seven consecutive days with flow above numeric instream flow)

Numeric Instream Flow and Gage Requirements

- Compliance gages are listed in Policy. Diversions can only occur when daily average flow at assigned gage is above the minimum instream flow requirement.
- Diverters shall measure and record daily water diversion and use
- Gage installation requirements for additional gages used for compliance with numeric flow requirement

Cannabis Cultivation Policy

(Numeric and Narrative Flow Requirements cont.)

Groundwater Requirements:

- Aquatic base flow thresholds during the dry season are established at compliance gages as one mechanism to help monitor whether groundwater diverters are having a cumulative negative impact on instream flows
- If it is determined that groundwater diversions have the potential to significantly affect surface water supply, forbearance periods or other measures may extend to groundwater diverters

Fully Contained Springs:

- Springs that do not run off a property in the absence of diversion and do not have surface or subsurface hydrologic connectivity at any time of year during all water year types may request to be exempt from **numeric instream flow and forbearance period** (requires substantial evidence)
- **Springs deemed exempt are subject to 50% visual bypass and Groundwater Requirements**



Cannabis Cultivation Policy

(Watershed Compliance Gage Assignments)

- Policy establishes minimum monthly flows at compliance gages
- Watershed areas without existing gages are assigned a compliance gage for a different location in same watershed or a nearby watershed with similar flow characteristics
- During diversion season, cannabis cultivators are required to check their compliance gage assignment at least daily and prior to diverting water to ensure water is available to divert at assigned gage
- Compliance gage assignments may change as more information becomes available

Cannabis Cultivation Policy

(Planning and Reporting)

Section 5

- Specifies the plans and reports that are needed, such as:
 - Site management plan
 - Erosion and sediment control plan
 - Nitrogen management plan
 - Site closure plan
- More detail provided in Cannabis General Order

Section 6

- Useful Guidance Documents
 - Links to helpful water quality facts and documents



Cannabis Cultivation Policy

Staff Report

- Overview of Cannabis Policy regions
- Background information on legislation and regulations
- Background and rationale for:
 - Policy requirements
 - Instream flow and gaging requirements
 - Compliance gage assignments (including methodology)
- Water quality antidegradation analysis

Cannabis Cultivation Policy

Peer Review

- Health and Safety Code 57004 requires scientific peer review of the scientific basis and scientific portions of the Policy
- Four reviewers were identified (located throughout the country)
- Focus of peer review on:
 - The requirements to reduce water quality and water diversion impacts associated with cannabis cultivation
 - The USGS natural flow modeling approach and modeling outputs
 - Development of statewide wet season instream flow requirements applying the Tessmann method
 - Development of statewide dry season instream flow requirements applying the Aquatic Base Flow Standard
 - The scientific portion of the Policy is based upon sound scientific knowledge, methods, and practices



Cannabis Cultivation Policy

Peer Review

- Reviewers did not identify any major additional scientific issues meriting assessment or a general lack of support for the overall science upon which the Policy is based
- General support for policy:
 - *“Overall, very good scientific basis was employed to develop the instream flows identified in the Policy.”*
- Dr. T. Ballestero
 - *“Overall, the draft Policy takes a comprehensive, balanced and scientifically robust approach towards achieving the objectives of the Policy for reducing water quality and water diversion impacts due to cannabis cultivation in the State of California.”*
- Dr. D. McKnight



Cannabis Cultivation Policy

Peer Review

- State Water Board staff concluded that no significant revisions to the Policy were required
- Additional information to clarify and support the Requirements in the Policy was added to the Staff Report
- Peer reviewers also included a number of minor suggestions and questions
 - Staff provided responses organized around the four conclusions submitted for peer review (available on the Cannabis Web Portal)



Cannabis Cultivation Policy

Cost Analysis

- Summary and estimate of cost to cannabis cultivators to implement Policy requirements
- Cost of permits and cost of implementing requirements
- Costs presented in ranges or units to account for wide variability in cultivation site sizes and conditions
- Assumes no prior permitting by the Water Boards
 - Existing Region 1 and 5 permittees may have a lower cost due to prior compliance activities



General WDRs and Waiver of WDRs (General Order)

- Developed by State Water Board to implement the requirements of the Principles and Guidelines, addresses both indoor and outdoor cultivation activities
- Addresses discharges from legal cultivation sites to protect water quality
- Recognizes other permitting requirements that apply, but does not implement those requirements
- If applicable, requires water rights compliance, but a water right is not provided in the General Order

Why Prepare a General Order?

- Cannabis cultivation has grown exponentially – often located in sensitive areas
- Prop 215 initiated legal cultivation activities, Prop 64 is expected to greatly increase the activity
 - As many as 50,000 cultivation sites may exist in the state
 - An August 2016 CDFA survey indicated 16,000 cannabis cultivation licenses would be sought
- CDFA will begin issuing cultivation licenses on or before January 1, 2018
 - Will require compliance with Water Boards' requirements
 - Many Regional Boards will need to provide coverage for cultivation activities, but lack a general order. Statewide General Order addresses issue.



General Order Approach

- Generally based on the North Coast and Central Valley Regional Water Board orders (2015)
 - North Coast RWQCB Waiver of WDRs (767 enrollees)
 - Central Valley RWQCB General WDRs (701 enrollees)
- The General Order requirements are tiered based upon the threat to water quality
- Tier classification is based on disturbed area and risk
 - Conditional exemptions apply for some cultivation activities
- All dischargers must comply with the applicable Best Practicable Treatment or Control (BPTC) requirements in Attachment A

General Order Discharger Classifications

Personal Use Exemption (non-commercial activity)

- Less than 1,000 ft² disturbed area
- Comply with setbacks, slope requirements, etc. or enroll as Tier 1

Conditionally Exempt (commercial activity)

- Indoor (any size)
- Outdoor
 - ✓ Less than 2,000 ft² disturbed area
 - ✓ Comply with exemption conditions, or enroll as Tier 1

Tier 1 (commercial activity)

- Disturbed area greater than 2,000 ft² and less than one acre
- Further categorized by risk (slope and setback compliance)

Tier 2 (commercial activity)

- Disturbed area greater than one acre
- Further categorized by risk (slope and setback compliance)

Personal Use Exemption

- Exempt from CDFA licensing requirements (non-commercial)
 - Recreational: up to 6 plants per property parcel
 - Medical: up to 6 mature plants or 12 immature plants per qualified patient
- Maximum 1,000 ft² disturbed area and 20% slope
- Contiguous cultivation area (all in one place)
- Complies with setback requirements
- Implements all applicable requirements in Attachment A of the Cannabis Policy
- Coalitions or cooperatives cannot claim this exemption
- No registration or enrollment requirement



Conditional Exemption (outdoor)

- Cultivators that produce commercial cannabis (medical or recreational) – CDFA license required
- Maximum 2,000 ft² disturbed area and 20% slope
- Contiguous cultivation area (all in one place)
- Complies with setback requirements
- Implements all applicable requirements in Attachment A of the Cannabis Policy
- Must obtain coverage under the General Order Waiver
- Pays an application fee but no annual fee



Conditional Exemption (indoor)

- Cultivators that produce commercial cannabis (medical or recreational) – CDFA license required
- Indoor means within a structure with a permanent roof and relatively impermeable floor (concrete or asphalt paved)
- No minimum or maximum cultivation area limit
- Implements all applicable requirements in Attachment A of the Cannabis Policy
- Must obtain coverage under the General Order Waiver
- Pays an application fee but no annual fee

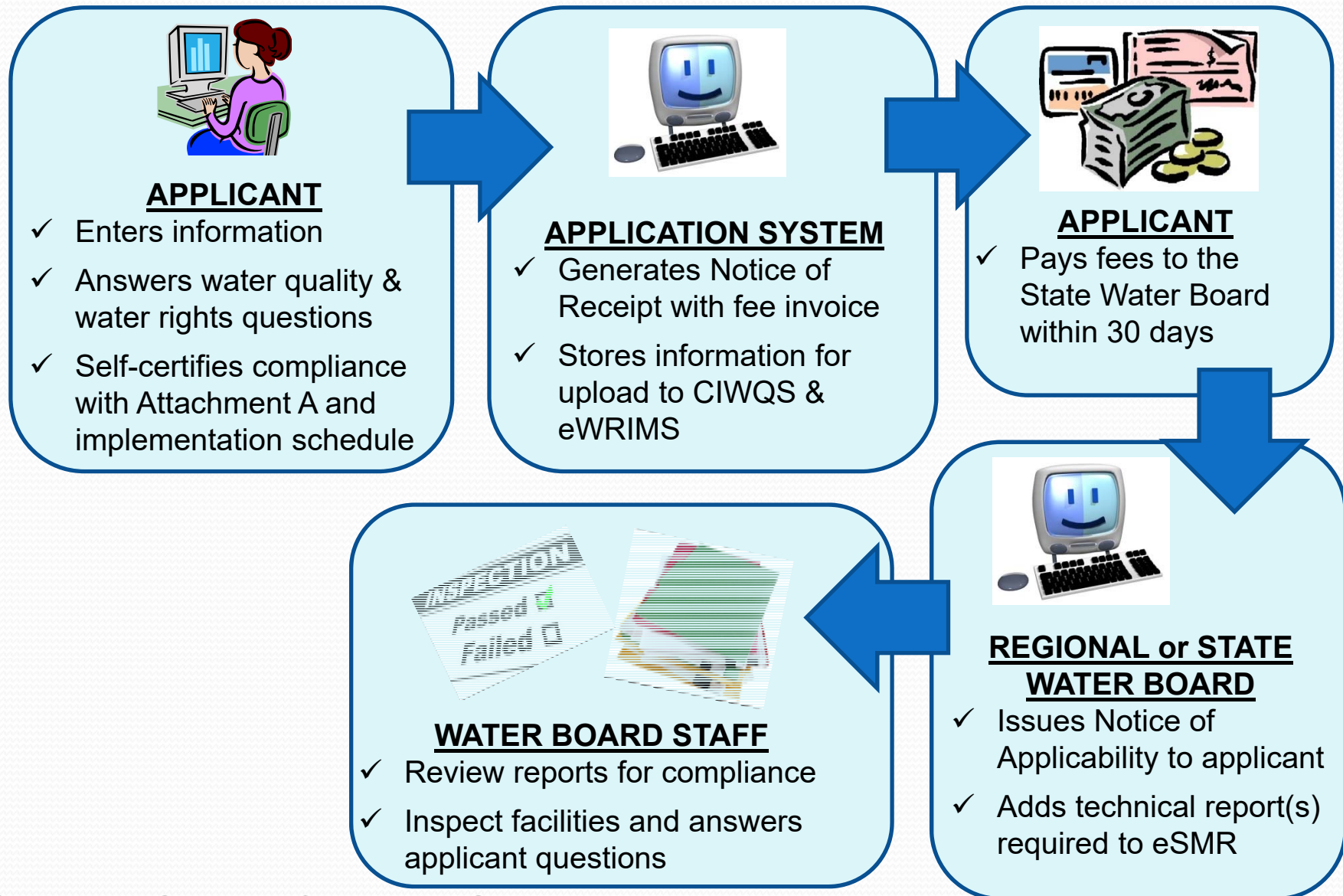
Tier 1 or Tier 2 Enrollees

- Cultivators that produce commercial cannabis (medical or recreational) – CDFA license required
- Tier determination is based on disturbed area
 - Tier 1 disturbs more than 2,000 ft² and less than 43,560 ft²
 - Tier 2 disturbs more than one acre (43,560 ft²)
- Complies with setback requirements
- Implements all applicable requirements in Attachment A of the Cannabis Policy
- Enrollment under the General Order is required
- Pays an application fee and annual fees
- Sites are further characterized by risk characteristics

Tier 1 & Tier 2 Risk Designations (Slope and Setback Compliance)

Low Risk	Moderate Risk	High Risk
<p>No portion of the disturbed area is located on a slope greater than 30 percent</p> <p><u>AND</u></p> <p>All of the disturbed area complies with the setback requirements</p>	<p>Any portion of the disturbed area is located on a slope greater than 30 percent,</p> <p><u>AND</u></p> <p>All of the disturbed area complies with the setback requirements</p>	<p>Any portion of the disturbed area is located within the setback requirements</p>

Registration and Enrollment Process



Reporting Requirements

- Conditionally Exempt dischargers
 - Site Closure Report – due **90 days prior** to ending cultivation
- Tier 1 and Tier 2 dischargers must submit reports based on the threat to water quality
 - Low Risk – Site Management Plan and Site Closure Plan
 - Moderate Risk – **add** Site Erosion Sediment Control Plan
 - High Risk – **add** Disturbed Area Stabilization Plan
 - Large area cultivation sites – **add** Nitrogen Management Plan
- Monitoring and Reporting Program (MRP)
 - Tier 1 and Tier 2 dischargers must submit annual monitoring reports (due March 1, each year)
 - Attachment B of the General Order contains the MRP
 - MRP can be revised by a Regional Water Board Executive Officer

General Order Summary

- All commercial cannabis activities are required to either be conditionally exempted or enrolled under the General Order
- Existing enrollees in the R1 and R5 orders:
 - Transition to the statewide General Order by **July 1, 2019**
 - Existing facilities allowed to continue operating with existing setbacks unless Regional Water Board finds not protective
- Previously exempt commercial cultivators under R1 and R5 orders must apply for General Order coverage
- All applications will be on-line via Internet
- Tier 1 and 2 cultivators have technical report requirements



Public Comments

- Public Comment Period
 - 61 calendar days (July 7, 2017 – September 6, 2017)
- 74 comment letters were received
- 5 commenters provided comments at the August 2, 2017 State Water Board workshop
- Approximately 500 comments
- Comments were received from general public, local agencies, environmental groups, consultants, and other state agencies
- Staff prepared response to comments document, broken out by:
 - Category/Subject
 - Commenter

Comments – Grandfather Coverage

Existing orders should be allowed to continue in effect – setbacks and legacy issues

- Legacy issues are only imposed for property owners in the North Coast Regional Water Board area. Included due to basin plan requirements
- Existing enrollees under North Coast or Central Valley orders not required to transition until July 1, 2019

Comments – Cost of Compliance

Concern about the number of reports required and lack of licensed professionals. Concerns that the costs will keep cultivators away from the legal market

- Number of reports is limited and based on site conditions and size of disturbed area
- A wide range of qualified professionals can prepare the reports
- Extension of transition period (described above) will reduce pressure on demand for services and cost

Comments – Regulatory Structure

Questions on how the Policy and General Order compare and contrast to the Regional Water Boards' existing orders and regulatory issues

- *Commenters self-described as small asked to be “left alone”*
 - Coverage is required for CDFA cultivation license
- North Coast Region adopted a waiver of WDRs in August 2015
 - Waiver coverage expires in August 2020
 - Coverage will need to be addressed, this approach addresses need
- Statewide General Order was generally modeled after the existing orders, attempt to minimize disruptions



Comment – Watercourse Definitions

Definitions of watercourses should be modified to improve alignment with the Forest Practice Rules

- Seep has been removed from the definition of perennial watercourse
- Spring has been updated to specify that a spring does not have a defined bed or banks
- Clarity added to the definitions that they are the same as the Forest Practice Rules, except where more protective
- Intermittent watercourse has been updated to include:
 1. Provides aquatic habitat for non-fish aquatic species
 2. Fish are always or seasonally present within 1,000 ft downstream

Comment - Setbacks

Cannabis cultivators covered under existing Region 1 and Region 5 cannabis regulatory programs want to retain existing setback requirements in regional orders

- Cultivators enrolled under existing cannabis WDR regulatory programs prior to October 17, 2017 may retain previously established setbacks (unless Regional Board EO determines not protective of water quality)
- Moderate risk setbacks have been removed and one setback has been established based on watercourse class type:

Common Name	Watercourse Class	Distance
Perennial	I	150 feet
Intermittent (wetlands)	II	100 feet
Ephemeral	III	50 feet
Man-made canals, etc. support native aquatic species	IV	Established Riparian
Other canals, etc.	IV	Not Applicable



Comment – Numeric Flow Requirements

The Tessmann Method has not been applied in California and will not represent the diverse and variable inter-annual and intra-annual hydrologic variability in California

- State Water Board staff agrees that the interim instream flow requirements derived from the Tessmann Method may be over protective in some locations and under protective in other locations
- For the development of long-term instream flow requirements, State Water Board staff, in consultation with CDFW, will evaluate other scientifically robust methods that are more reflective of regional variability and the needs of target species

Comment – Exempt Springs

Springs that do not flow off the property are not having a direct impact on surface flow and should be exempt from the narrative and numeric flow requirements

- Springs may be exempt from the numeric flow requirement and forbearance period if the spring does not have a surface or subsurface hydrologic connectivity at any time of year during all water year types (substantial evidence required)
- The spring is still subject to:
 1. The 50% visual bypass Narrative Flow Requirement to support the spring's aquatic and riparian habitat
 2. The Requirements for Groundwater Diversions to address the potential cumulative impacts from groundwater diversions that the spring may contribute to

Comment - Storage in 2018

If the Cannabis Cultivation Policy is adopted on October 17, cultivators will not have time to put in enough storage to get through the dry season forbearance period in 2018

- Riparian water right holders will not be subject to the forbearance period in 2018 to allow time for installation of storage
- Limitations on diversion rate (10 gallons per minute) and Narrative and Numeric Flow Requirements still apply
- During the delayed forbearance season in 2018, the groundwater low flow threshold (now termed the groundwater aquatic base flow) will serve as the flow requirement
- Required to file for a Cannabis SIUR or submit an application for an appropriative water right permit to obtain storage prior to diverting water for cannabis cultivation during the 2018 forbearance period.



Comments – Tribal

- *Tribes raised several concerns related to the proposed conditions to protect tribal cultural resources.*
 - new requirement that cannabis cultivators conduct a Sacred Lands Inventory search through the Native American Heritage Commission prior to ground disturbing activities for new or expanded cannabis cultivation.
- *Request to have all cannabis cultivation sites vetted by the tribes and/or an archeologist prior to issuance of the Water Boards permits*
 - No changes made



Comments - CEQA

- *Confusion related to the CEQA exemption and concerns that CEQA will not be completed, when necessary*
 - Water Code section 13149, subdivision (b)(1), provides that the Policy shall qualify for a categorical exemption
 - CEQA applies to discretionary approvals of “projects” by state or local government agencies



Additional Revisions

- Clarified that “conditionally exempt” sites are required to be covered under a Waiver of WDRs
- Definition of winter period revised to include special county rules and Lahontan Basin Plan requirement
- Clarified that technical reports must be approved by Regional Water Board Executive Officer prior to implementation
- State Water Board executive management can also issue notice of applicability (not limited to Regional Water Board Exec. Officer)
- Limit on road grades (slope) consistent with the Road Handbook



Change Sheets

- Change sheets are located in the back of the room
- Two change sheets – one for Item 6 and one for Item 7
- Minor edits and clarifications

Contacts

Small Irrigation Use Registration

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Questions?

