

Mendocino HQ, Inc.
801 Quarry Road
Willits, CA 95490



November 26, 2018

State Water Resources Control Board
Attention: Jeanine Townsend
1001 I Street, 24th Floor
Sacramento, CA 95814
Comments sent via email to:
commentletters@waterboards.ca.gov

RE: Proposed Updates to the Cannabis Cultivation Policy

To Whom It May Concern:

We are a small family farm here in Mendocino County. I am writing to express my deep concern regarding the ramifications of cannabis cultivation policies.

First, in regard to the potential exemption from the 600' tribal buffer; the cultivation style (Mixed Light vs. Indoor) should not have such a varying degree of policy. For instance, a Mixed Light operation with a commercial greenhouse would have impermeable floors and walls. Therefore, producing an equivalent threat to both water quality and environmental impact as an Indoor operation. Moreover, an operation with hoop houses built with impermeable floors and siding would also produce an equivalent impact. The main difference being the amount of electricity utilized in which case an Indoor operation provides an increased environmental impact. There is no reason that these cultivation styles should have such disparate policies. As long as there is siding and impermeable flooring the threat to water quality remains consistent across cultivation styles. Please take this important point under consideration when evaluating policies.

Furthermore, our farm has worked hard to remain compliant among several agencies each with differing policies in place. We have exhausted a tremendous amount of both time and financial resources to become Water Board compliant – For example, putting in well over \$20,000.00 worth of new culverts. We have been permitted and enrolled with the Water Board since the beginning of our operation which predates any Tribal Setback policies that came into place in November of 2017. There needs to be consideration that these ever-changing policies are gravely affecting small family farms. Is it not reasonable to grandfather in the good actors that invested in remediating legacy issues and have invested in land coupled with a complaint business prior to these rules existing? We have gone through enormous efforts and

expenditures to comply with all rules and regulations and without warning now have the possibility of our entire life savings, businesses, and permissions being revoked.

Thank you for your time, consideration, and attention to these matters.

Best,

Jeremy Pope
Steward of the Land