

LATE COMMENT

From: [Sam Rodriguez](#)
To: [Schultz, Daniel@Waterboards](mailto:Schultz.Daniel@Waterboards)
Cc: [John De Friel](#); [Matthew Allen](#); [Sam Rodriguez](#)
Subject: Per our conversation - Memo
Date: Wednesday, November 28, 2018 9:45:45 AM
Attachments: [Dan Shultz at Water Board.docx](#)



Hi Dan:

Thanks for all of your time and insights.

As promised - attached is our Memo underscoring our collective concerns regarding the Winterization Bulletin for Cannabis Farmers.

We look forward in our continued discussions and offer to assist in where ever we can in the region.

Best,

Sam

[Sam Rodriguez](#)
Consultant/Lobbyist and Media Advisor
Rodriguez Strategic Partners LLC

www.rodriquezstrategicpartners.com

916.849.4300 (cell/text)

"Science and everyday life cannot and should not be separated" - Rosalind Franklin, Scientist and Chemist - discovery of the structure of DNA, pioneering use of X-Ray diffraction.

RODRIGUEZ

STRATEGIC PARTNERS LLC

TO: Daniel Shultz
California Water Board Agency

FR: Sam Rodriguez
Principal, Rodriguez Strategic Partners
916-849-4300

CC: John De Friel, Co-Founder, Central Coast Agriculture LLC
Matt Allen, General Counsel

RE: Winterization Regulatory Bulletin for Cannabis Farmers

DT: November 28, 2018

Hi Dan:

We appreciate you taking the time yesterday morning to address our concerns about the “Winterization Regulatory Bulletin for Cannabis Farmers” released in October of this year.

As we discussed, there’s an acknowledgement and recognition that the Agency is responsible to protect farmland and the overall environment from ‘Bad Actors’ - especially in the “Emerald Triangle” in far north California. Unfortunately, some of the provisions in the winterization regulations are unworkable and actually do harm to ‘Good Actors’ - especially Central Coast Agriculture and others in Santa Barbara County who are compliant with all local and state mandates and regulations.

Specifically, we are recommending a technical language modification in Section 127 - Cannabis cultivators shall not operate heavy equipment of any kind at the cannabis cultivation site during the winter period, unless authorized for emergency repairs contained in an enforcement order issued by the State Water Board, Regional Water Board, or other agency having jurisdiction [or if related to soil preparation or planting](#)

[activities as set out in a cultivator's approved site management plan.](#) (Cannabis Cultivation Policy: Attachment A – October 17, 2017)

Moreover we strongly believe that your office can provide additional guidelines to the regional and local offices affording them flexibility to consider on a case by case basis utilizing the approval process of the Cannabis Farmer Site Management Plan and still meet your statutory and regulatory goals.

Once again we appreciate this opportunity to engage and provide an objective perspective on the real impacts of well-intentioned policies to address serious problems but have unintentional dire consequences on traditional cannabis farmers in Santa Barbara County.

We look forward to our continued conversations and would gladly participate and/or host a meeting with other stakeholders from the region.

Please don't hesitate to contact Matt Allen or me, if you need additional information.

Best always,

Sam