

From: [Organnabliss Farms/Andy B & Marjo Lak](#)
To: [commentletters](#)
Subject: Waterboards cannabis comments
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Here are my Comments regarding the Proposed Water Quality Cannabis Regulations.

Firstly, I applaud all the agencies for developing the long overdue environmental regulation and policies for Cannabis Cultivation in CA.

I have reviewed the entire set of documents and submit the following comments. Although I do not have solutions for all of my comments, I do know there are several areas of the proposed regulations that are just not practical, obtainable, or reasonable for the majority of Cannabis Cultivators on the North Coast to achieve. There is a wide range and diversity of conditions (topography, slope, geography, geology, rainfall, etc.) that exist here. A “one size fit all” set of rules will not be able to adequately address the water quality issues that exist among such a broad spectrum of ever changing scenarios.

Also take more into consideration the unique circumstances around changing from an industry that already exists without any regulation at all to one that will exist with potentially the strongest regulations ever proposed. This will take time and a lot of money for people to adjust and implement these practices. Every site is different and has a different set of issues and conditions to address. If the costs of compliance are not reasonably obtainable this will lead to fewer permitted farms and furthermore lead to more environmental damage as well as the eventual economic devastation of the region. I would suggest, especially for the North Coast Region, to have more flexibility in developing ‘site specific’ plans and mitigation options. As well as extending the time line in order to achieve compliance with rules.

The costs associated with bringing rural properties into compliance with these rules in the suggested timeline are unachievable for most all small and craft license holders. Even if these farms were to do so, the investment at this critical time in transitioning to a legal industry would most likely plunge all of these farms into debt and fail from the start. Failed businesses and cultivation sites would most likely lead to abandonment of properties whose roads, culverts, and waterways would become unmaintained and lead to severe long term environmental and water quality damage.

I suggest a two tiered set of timelines -1) for cultivation site and immediate area, workspace, housing areas, setbacks, etc 2) for rest of property, legacy issues, road systems.

I suggest WQCB work with CDTFA to recommend legislation that would provide tax incentives and fee exemptions for Cannabis Cultivators to come into compliance with these rules.

I suggest changing rules around banning plastic netting to guidelines for proper storage, recycling, and general wildlife safety education. In ten years of using plastic netting I have never had any issue harming wildlife and have been able to reuse netting over several years.

A big question a lot of folks are asking is why there is no mention of any water quality monitoring, impacts, study, or regulation around Indoor Cultivation? Certainly a Commercial Indoor Grow will have pollution entering back into municipality, drains, waterways etc. Please adopt rules, study, and guidelines to prevent and mitigate industrial water pollution from indoor cannabis sites.

There is also the fact that the county roads that a state inspector would travel on to reach cultivation sites and issue potential violations aren't even held, financed, or enforced to these same standards. Couple that with the reality that approximately 10% of existing grows are going into legalization. The same inspectors will also pass through a majority properties that have unpermitted grows with a multitude of complex environmental issues for the most going unpunished.

I think we all get that the whole North Coast Cannabis world is very complicated. My strongest point is to make sure that there are workable, reasonable, solutions towards bringing outdoor cultivators into legalization and compliance with environmental laws.

The entire economy of northern California holds delicately in the balance of this goal!!

Thanks you Sincerely,

Andy Butts

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