

Water Boards' Cannabis Cultivation Program
 2018 Program Review and Assessment Report
 Summary of Recommendations

Recommendations	Action	Status	Lead/Participants
Coordination			
Continue Executive Oversight Group Meetings	The Program's Executive Oversight Group will continue to meet on a regular basis.	Complete. Meetings ongoing (currently bi-weekly).	Executive level staff from OE, DWQ, Water Rights, DAS, North Coast Region, Central Valley Region.
Establish a Program Manager	The Program's Executive Oversight Group will investigate the possibility of establishing a new or existing position as Program Manager for the Water Boards' Cannabis Program and determine the appropriate path forward by July 2019.	In progress.	Executive Oversight Group.
Strengthen State Agency Partnership through a Revised Joint Strategic Plan	Establish a working group of appropriate individuals from each agency in Fall 2019 to develop a revised Joint Strategic Plan between the Water Boards, CDFW, and CDFA by the end of 2020.	CDFA Subcommittee initiated to focus on inter-agency inspection protocol and will have first meeting in November 2019.	Representation from OE and Water Rights Enforcement.
Release Program Procedures to Promote Consistency	Complete development of the Program Procedures document and release by Summer 2019. Implement Procedures, including statewide training as necessary, by the end of 2019. Update the Procedures document once per year for the first five years of the Program.	Complete, with revisions ongoing. Program Procedures document distributed internally in September 2019. DWQ responsible for future updates to Procedures. Comments will be discussed at the first Program Roundtable of 2020.	DWQ in collaboration with OE, Water Rights, and Regions.
Develop and Launch the Program-wide	Existing working group will work with DIT to develop, test, and launch a Program-wide Case	Case Management Tool (Combined Reporting and	Water Rights and DIT, with representation

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Case Management Tool	Management Tool no later than Fall 2020.	Operational Process System [CROPS]) development and testing in progress.	from all Divisions, Regions, and Offices.
Make a Commitment to Program Quality	Establish an internal working group in Spring 2020 to develop a Quality Assurance Program Plan (QAPrP). Implement the QAPrP, including training as necessary, by Summer 2021.	Working group will be initiated in Spring 2020.	Representation will be requested from all Divisions, Regions, and Offices, as appropriate.
Enrollment and Resources			
Explore Interim Funding Solutions for the Program	<p>(a) Begin discussions with the Department of Finance to explain revenue shortfalls and identify an appropriate mix of fee and alternate funding support for the Program.</p> <p>(b) Host a series of Fee Stakeholder meetings beginning in Spring 2019 in anticipation of a revised fee schedule by the end of 2019. Determine each year if modifications to fee schedules are appropriate for the coming year.</p>	<p>(a) Discussions ongoing since June 2019. A BCP for FY 2019-20 is in development.</p> <p>(b) Fee stakeholder meetings began in March 2019. In September 2019, the State Water Board approved a fee increase for the Cannabis SIUR only. Water quality fees may be increased pending outcome of proposed FY 2019-20 BCP.</p>	DAS and Executive Oversight Group.

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Implement Enrollment Enforcement Strategies Statewide	Prioritize at a minimum one 12-digit hydrologic unit code (HUC-12) watershed to implement enrollment enforcement efforts in each region (if appropriate) by Fall 2019. Issue first notices within those prioritized watersheds by the end of 2019.	Work to be initiated in Fall/Winter 2019.	Regional Water Boards, Water Rights.
Develop Strategy to Complete Transitions and Terminations	Program staff at the North Coast and Central Valley Regional Water Boards will develop work plans no later than July 2019 on how they will allocate resources to complete transitions and terminations while still being able to perform other necessary duties such as enrollment and enforcement.	North Coast and Central Valley Regional Water Boards have work plans in place. Work to complete the transitions and terminations is ongoing.	North Coast and Central Valley Regional Water Boards with assistance from DWQ and OE, as appropriate.
Shift Outreach Focus from Enrollment to Compliance Assistance and Enforcement	Develop a workshop format presentation by the end of 2019 that goes through how to comply with the requirements of the Policy, General Order, and Cannabis SIUR; examples of site best practices; as well as an overview of enforcement tools. Host the first series of these compliance assistance workshops in Spring 2020.	Some work has already been done by DWQ and Water Rights. Regular meetings to begin in Fall/Winter 2019.	DWQ, Water Rights, and OE.
Inspections and Enforcement			
Establish an Inspections Working Group	Establish an internal working group in Summer 2019 to evaluate inspection protocols and present recommendations to the Program's Executive Oversight Group for approval no later than July 2019.	Complete. Inspections Working Group developed the Cannabis Inspections Decision Tree and Guidance, approved by Executive Oversight Group on 08/01/19.	Representation from all Divisions, Regions, and Offices.

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Establish a Program-wide Protocol for Identifying Cultivation Sites	Establish an internal working group in Summer 2019 to develop Program-wide protocol and minimum aerial imagery standards for identification of cultivation sites and present recommendations to the Program's Executive Oversight Group for approval by the end of 2019.	Aerial Imagery Working Group initiated in September 2019. First meeting to occur in October 2019.	Representation has been requested from DWQ, Water Rights, OE, R1, and R5. Any deliverables will undergo review by all Divisions, Regions, and Offices.
Expand Enforcement Teams throughout the State	During development of the next BCP for the Program, evaluate the potential need to add resources allocated to enforcement at both the State Water Board (i.e., OE and Water Rights) and Regional Water Board levels.	A BCP for FY 2019-20 is in development and will seek additional enforcement resources to meet the expansion of CDFW's CEP from three teams in the north to eight total teams statewide.	Executive Oversight Group and Program Coordinator (when established).
Develop a Strategy to Assist Federal Agencies	Establish an internal working group in Fall 2020 to consider the development of a strategy to formally engage with federal agencies on this matter and present recommendations to the Program's Executive Oversight Group for approval by the end of 2021.	Work will be initiated in Fall 2020.	Representation will be requested from all Divisions, Regions, and Offices, as appropriate.