

From: theora@truehumboldt.com
To: [commentletters](#)
Subject: Comment Letter – Cannabis Policy and Staff Report
Date: Wednesday, September 6, 2017 11:58:57 AM



Dear Peter,

Thank you for your continued efforts to create policy that works for all parties involved in the cannabis industry. We appreciate your work in creating regulations for this new and complex industry. I am the Director of the Humboldt Sun Growers Guild, a network of over 240 farms located in Humboldt and Trinity counties. I have written comment on the proposed cannabis cultivation policy that reflect the comments and concerns of our farmers. We hope they help you in understanding the nuances of cultivation in our area and navigate the challenging task of regulating medical cannabis in California.

Comment on State Water Resources Board Draft Cannabis Policy

Attachment A: Draft Requirements for Cannabis Cultivation

Section 1 - General Requirements and Prohibitions

1. "Prior to commencing any cannabis cultivation activities...."

The majority of farms applying for cultivation permits were existing before new regulations were passed. Does this statement apply to all farms? This would seem to put a halt to all operations for a period of time after the State Water Board regulations are passed as farms enroll, pay fees and submit proper paperwork. This statement should be amended to allow existing farms in operation prior to the passing of these regulations to continue to operate. They have already been working toward compliance with the North Coast Regional Water Board and should be allowed to continue cultivation in good faith that they will adopt and adhere to the new State Water Board regulations in a timely manner.

36. "Cannabis cultivators shall comply with the minimum riparian setbacks described below...."

These setbacks are similar but not the same as the North Coast Regional Water Board setbacks implemented August 2015. Local farms have already invested heavily in complying with regional requirements. Some farms may be unable to comply with State proposed setbacks due to a difference of 50ft. We propose that the Regional Water Board be able to make site specific allowances for farms that have complied with regional setbacks but may not be able to comply with state setbacks.

101. "...cultivators shall maintain daily records of all water used for irrigation of cannabis."

This seems appropriate for the first year to gather data for water storage estimates, but is an excessive requirement for every season thereafter. This requirement is very strict in comparison to other ag crops in California.

Section 3 - Numeric and Narrative Instream Flow Requirements

4. "Forbearance Period.....April 1- Oct 31"

This forbearance period is not the same as the North Coast Regional Water Board forbearance period of May 15-Oct 31. The proposed SWB period would reduce the ability of local farms to collect and store water for an additional month and a half. We request that the regional forbearance period in the North Coast region be observed as our area is known to receive more annual rainfall in general compared to the rest of the state. Having the same forbearance period for Southern California and the North Coast Region seems unreasonable considering the vast variance in rainfall across the state.

Section 4 - Watershed Compliance Gage Assignments

"...required to check the website for their compliance gage assignment at least daily..."

This can be restrictive and an unreasonable expectation for rural farms without internet access. If a cultivator does not have internet access, there should be an alternative option for checking their assigned watershed gage, either via phone or other method determined by the SWB.

Thank you for your consideration of our comments on the proposed cannabis policy. We look forward to adhering to your policy!

Regards,
Theora

Theora Jackson
Director
Humboldt Sun Growers Guild
707-444-8783
theora@truehumboldt.com
truehumboldt.com

Feeling social?
Follow us on Instagram
[@truehumboldt](https://www.instagram.com/truehumboldt)
[@sungrowers](https://www.instagram.com/sungrowers)
Like us on Facebook
[@humboldtsungrowersguild](https://www.facebook.com/humboldtsungrowersguild)

"STATEMENT OF CONFIDENTIALITY

The information contained in this electronic message and any attachments may contain confidential or privileged information intended for the exclusive use of the addressee(s). Do not re-post this document anywhere. If you are not the intended recipient, please notify the sender by reply e-mail and destroy all copies of the original message and any attachments. In accordance with Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521."



FREE Animations for your email

Click Here!