November 20, 2018

ELECTRONIC MAIL

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Ms. Townsend:

COMMENT LETTER – UPDATES TO CANNABIS CULTIVATION GENERAL ORDER

The City of Los Angeles Bureau of Sanitation (LASAN) appreciates the opportunity to provide comments on the State Water Resources Control Board’s (State Water Board) proposed updates to the General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities. LASAN supports the State Water Board’s efforts to continually review and update the Cannabis Policy and Cannabis Cultivation General Order, which was adopted in October 2017. The General Order will ensure, to the greatest extent possible, that discharges to waters of the State do not adversely affect the quality and beneficial uses of such waters.

LASAN submits the following comment for State Water Board’s consideration:

1. Attachment D, Technical Report Guidance, Page D-8: Nitrogen Reporting Worksheet Example Calculation for Potassium (K) in the N – P – K diagram, “Potassium 10% K in a 100 lbs. bag = 1 lbs.” The correct resultant pounds of Potassium (K) should be 10 lbs., not 1 lbs.
If you have any questions, please contact Hassan Rad, Regulatory Affairs Division Manager, at (213) 847-5186 or by email at hassan.rad@lacity.org.

Sincerely,

[Signature]

ENRIQUE C. ZALDIVAR, P.E.
Director and General Manager
LA Sanitation and Environment

ECZ/HR:km

c:  Traci Minamide, LASAN  
Mas Dojiri, LASAN  
Tim Dafeta, LASAN  
Roshanak Aflaki, LASAN  
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