



Covelo Cannabis Advocacy Group



Date: November 24, 2018

To: State Water Board
commentletters@waterboards.ca.gov

Thank you for taking the time to review our comments on the proposed language for the Cannabis Cultivation General Order.

We are grateful to see new language clarifying tribal land authorization that does not put tribal communities in jeopardy with Federal Agencies regarding cannabis cultivation.

The following comments to each section are noted in red italics. Please consider these recommendations when finalizing the requirements.

Sincerely,

Monique Ramirez
Covelo Cannabis Advocacy Group

Groundwater Requirements¹⁰

The State Water Board will notify cannabis cultivators of the possibility that a groundwater forbearance period or other measures may be imposed so that the cultivators can install storage, coordinate diversions, take measures to secure alternate water supplies, or identify other measures to address the low flow condition. *Please indicate a time frame for when cultivators would be notified.*

Soil Disposal and Spoils Management

Cannabis cultivators shall separate large organic material (e.g., roots, woody debris, etc.) from soil materials. Cannabis cultivators shall either place the large organic material in long-term, upland storage sites, or properly dispose of these materials offsite.

The State Water Board should encourage the composting of root balls, and stalks of cannabis plants and therefore, remove this provision that roots etc be separated from soil materials. Many cultivators use this rich plant material to compost back into the soil for future plantings, which helps to encourage a closed-loop system and a healthy ecosystem.

89.

Cannabis cultivators shall not cause or allow any overflow from off-stream water storage facilities that are closed to the environment (e.g., tanks and bladders) if the off-stream facilities are served by a diversion from surface water or groundwater. Cannabis cultivators shall on a monthly basis, at a minimum, regularly inspect for and repair all leaks of the diversion and storage system. Written records describing the date, time, and nature of such inspections and repairs shall be kept on-site for a period of at least two years. Such written records shall be made available for review by Water Boards or CDFW, and any other authorized representatives of the Water Boards or CDFW.

Written Records only describing when a repair has been performed should be required. It seems overly burdensome to require record keeping of inspections that do not indicate problems.

91.

Cannabis cultivators shall maintain a written copy of the manufacturer's specifications for each storage tank used for a period of 12 months beyond the last day the storage tank is used.

Please remove this requirement. What is the intention for having it? Many cultivators do not have their original manufacturer's specifications.

Water Conservation and Use

97. Cannabis cultivators shall maintain daily records of all water used for irrigation of cannabis. Daily records may be calculated by the use of a measuring device or, if known, by calculating the irrigation system rates and duration of time watered (e.g., irrigating for one hour twice per day using 50 half-gallon drips equates to 50 gallons per day (1 hour x 2 times per day x 50 drips x 0.5 gallons per drip) (1*2*50*0.5) of water used for irrigation). Cannabis cultivators shall retain, for a minimum of 5 five years, irrigation records at the cannabis cultivation site and shall make all irrigation records available for review by the Water Boards, CDFW, and any other authorized representatives of the Water Boards or CDFW.

This requirement creates an undue hardship on cultivators that are faced with reporting requirements from other agencies. For small operators, this will be a hard requirement to meet. Especially because some days, a

cultivator will have to go out of town for supplies etc and will not be able to record this daily data. This seems overboard to require daily records.