

Comments on the Cannabis Policy and the General Order
September 6, 2017



I could not locate the Cannabis Policy anywhere.

I am very familiar with the General Order. I am a registered architect and a licensed general contractor that is very familiar with regulatory procedures. I have many comments on the General Order but I want to make one very clear. The most important action the Water Board can do is add regulations for indoor cultivation operations. Indoor cultivation is extremely detrimental to the environment.

Both local jurisdictions and the Water Board do not understand commercial cannabis cultivation. Indoor cultivation requires massive resources and is not sustainable. The Water Board needs to develop regulations for indoor cultivation, especially hydroponic.

A typical outdoor cultivation requires sunlight, water, and soil. A typical indoor cultivation requires duplicating an outdoor environment indoors. This includes intense lighting, air movement and filtering, and heating/cooling. Hydroponic cultivations can dump thousands of gallons of contaminated water into the sewer system several times a year.

Outdoor cultivation is no different than any other form of agriculture like grapes or walnuts. The current General Order is expensive and time consuming while not being effective. The tier system is arbitrary and is unique to cannabis cultivation.

The inclusion of cultivators in the development of these regulations is invaluable and it is obvious that they were not. The Water Board needs to continue the review of these regulations until they get proper input. I volunteer.

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