



September 4, 2015

*TO: CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, CENTRAL VALLEY REGION  
RE: ORDER R5-2015-XXXX WASTE DISCHARGE REQUIREMENTS GENERAL ORDER FOR DISCHARGES  
OF WASTE ASSOCIATED WITH MEDICINAL CANNABIS CULTIVATION ACTIVITIES*

I write today on behalf of the Emerald Growers Association, a statewide association of cannabis growers. We have dozens of members throughout the central valley region. We are actively building and organizing growers in counties throughout your region.

I write today to offer our strong support for moving forward with passage of the order.

Please find our brief comments below.

## HIGHLIGHTS:

### LEADERSHIP AND COLLABORATION

Thank you for your leadership on this program. We greatly appreciate and commend your staff for their efforts. They are exactly the type of collaborative partners that our community depends on to make the transition to regulation.

### BMP's!

The best management practices guide proposed in Attachment A is great work. Looking forward to distributing them to all of our members!

### STREAMLINED REGULATION

The Central Valley document is a streamlined regulatory document. This will be critical to communicating the program to the regulated community.

## CONCERNS:

### THIRD PARTY COMPLIANCE PROGRAM

We encourage the board to develop and pass detailed guidelines for third party compliance programs. This will be a critical component of the programs success.

### BANS: A PROHIBITION ON PROBLEM SOLVING

We expect your program will have little impact on water quality until local governments develop a more effective and thoughtful approach to regulating cannabis within their jurisdictions. Though it is not directly related to this program, we must tell you directly: banning cultivation is bad public policy. The wave of bans that has spread throughout the Central Valley region are the driving force behind the worst water quality and public safety impacts of cannabis cultivation. Your



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program is poised to be a breakthrough problem solver, but local policies in many counties in the region prohibit us from making progress in partnership.

### STATEWIDE CONSISTENCY: FOLLOW THE NORTH COAST ON ACREAGE

We strongly encourage the Centrally Valley Water Board to change the acreage thresholds in the suitability language for each tier to be more consistent with the North Coast's waiver. Consistency statewide is a critical component of success as we strive to transition to a well regulated cannabis industry. Disparities between regions will increase the incentives for operators in the regulated community to continue engaging in unregulated commerce.

We continue to be available for consultation or for continued collaboration on community outreach. We look forward to a building a strong partnership with the central valley board.

Sincerely,

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Executive Director

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