2.2 Summary of Expected Emergency MAUCRSA Regulations

2.2.1 Introduction

The Bureau's expected regulations will be divided into several sections. To assist the reader, this document summarizes each section in the following order: Section 2.2.2 summarizes general provisions that will be applicable to all Bureau licensees. The second, Section 2.2.3, contains a summary of regulations applicable only to the activities of distributors. Regulations that will apply to the activities of retailers are summarized in Section 2.2.4. Section 2.2.5 details regulations applicable to testing laboratories. Section 2.2.6 summarizes regulations that will apply to microbusinesses. These summaries are intended to provide the reader with an overview of the anticipated regulations.

2.2.2 General Provisions Applicable to All Bureau Licensees

The first part of the Bureau's MAUCRSA regulations will address requirements that apply to all licensees under its jurisdiction. This will include areas such as definitions, application requirements, security measures, and handling of cannabis waste.

General Provisions

The Bureau's regulations will define terms that will be used throughout the regulations. For example, terms such as "cannabis goods" and "cannabis waste" will be defined to clarify for the public how the Bureau classifies cannabis and cannabis products at different stages of the supply chain.

Applications

The Bureau's regulations will outline application requirements, including the documents and information that must be submitted in license applications.

Applicants will be required to submit identifying information for every owner. Applicants will also be required to provide information regarding their funding sources and owners' criminal conviction histories.

Applicants will be required to submit descriptions of their operating procedures, including security, inventory, and quality assurance. Applicants will submit a diagram of the premises to be licensed, and proof of a surety bond in an amount to be determined by the Bureau. Applicants will provide evidence that the proposed premises is beyond a specified radius from a school. Applicants will be required to submit a seller's permit number or attest that the applicant is currently applying for a seller's permit from the California Department of Tax and Fee Administration, if the cannabis activity that will be conducted requires such permit.

Applicants will be required to submit certain legal compliance documentation when applying for a license. Applicants must also provide proof of their right to occupy and use the premises for commercial cannabis activity. They also may voluntarily provide documentation from their local jurisdiction that the applicant is or will be in compliance with all local ordinances and regulations.

General Licensing

The regulations will include several sections regarding varied aspects of the licensing process.

The Bureau's regulations will require licensees to obtain written approval from the Bureau prior to making material or substantial physical modifications to the licensed premises. The regulations will outline examples of what constitutes a material or substantial modification, as well as a process for requesting Bureau approval.

Track-and-trace requirements applicable to all licensees will be identified. Licensees will be required to create and maintain active accounts within the track-and-trace system and ensure good recordkeeping practices.

Enforcement

In addition to the provisions of Business and Professions Code section 26030,[2] the Bureau may take disciplinary action against a licensee for multiple reasons, such as denying access to the licensed premises for inspection by the Bureau and violations of applicable laws and regulations, including requirements related to cannabis waste. Licensees are responsible for the acts and omissions of their agents, officers, and employees. The regulations will address proposed penalties for violations of laws and regulations, as well as guidance for administrative law judges hearing enforcement cases.

Records and Reporting

In the regulations, the Bureau will specify the types of records that licensees must keep, including financial, personnel, and security records; training records; contracts; and permits, licenses, and local business authorizations. The regulations will require that these records can be produced when requested by the Bureau.

Licensees will be required to notify the Bureau of a criminal conviction or civil penalty against the licensee, revocation of a local license, and theft or loss of cannabis goods.

Security

The security regulations will outline security procedures and requirements. Licensees and persons acting for or employed by a licensee must display photo identification badges while engaging in any commercial cannabis activity. Visitors to any licensed premises will be required to be escorted by an employee when visiting limited-access areas of the premises. All licensees will be required to install and maintain a video surveillance system to record all

[2] Business and Professions Code section 26030 specifies that licensing agencies may take disciplinary action for failure to comply with MAUCRSA or any rules or regulations adopted pursuant to MAUCRSA; conduct that constitutes grounds for denial of licensure; any other grounds contained in regulations adopted pursuant to MAUCRSA; failure to comply with any state or local law, ordinance or regulation; intentional sale of cannabis or cannabis products to person under 21 years of age (A-licensees) or without a physician's recommendation (M-licensees); failure to maintain safe conditions for inspection; or failure to comply with any operating procedure submitted to the licensing authority.

entries and exits, as well as all areas where cannabis is received, processed, and stored, as well as security rooms. Retailers will also be required to record all point-of-sale areas and areas where cannabis is displayed for sale. Cameras must record 24 hours per day, and recordings must be kept for a specified period of time.

The regulations will require that licensees install and use commercial-grade nonresidential locks on all points of entry and exit to the premises and limited-access areas. Licensed premises will have an alarm system that is monitored and maintained by a licensed alarm company. The Bureau also requires retailers to hire or contract with security personnel to provide security services at the licensed premises.

Destruction of Product

The Bureau's regulations will specify the procedures and limitations for destruction of cannabis and cannabis products.

Cannabis and associated waste will need to be stored, secured, locked, and managed in accordance with all applicable laws.

Licensees will be required to keep accurate and comprehensive records documenting cannabis destruction activities. In addition, certain relevant information regarding cannabis destruction activities must be entered into the State's track-and-trace system.

2.2.3 Distributors

The Bureau's MAUCRSA regulations will outline the restrictions on and responsibilities of licensed distributors. Topics addressed include allowable activities, testing and quality assurance, and other requirements.

Activities

The regulations will set out requirements for licensed activities of distributors. Distributors are responsible for ensuring that all cannabis goods receive a thorough quality assurance inspection, which includes laboratory testing, prior to distribution to a retailer. Distributors are also the only license type that can transport commercial cannabis goods. Distributors may act as wholesalers or may charge other licensees a fee for conducting distribution on their behalf.

The regulations will set out cannabis storage requirements for distributor licensees. Bureau regulations will require that licensed distributors store batches of cannabis goods separately and distinctly from other batches of cannabis goods and label each batch with specific identifying information.

The regulations will provide that distributors may package and label—or repackage and relabel—cannabis in the form of dried flower on behalf of a cultivator or another distributor. Distributors may not package, repackage, label, or relabel manufactured cannabis goods.

Transportation

The Bureau's regulations will detail safety and security provisions that distributors must comply with when transporting cannabis or cannabis products. Cannabis goods will be required to be transported inside commercial vehicles or trailers. Transportation may not be done by aircraft, watercraft, rail, drones, human powered vehicles, or unmanned vehicles. Distributor licensees will be required to submit proof of ownership or a valid lease, proof of insurance, and identifying information for any vehicles that will be used for transporting cannabis goods. Additionally, license applicants must submit proof of insurance in an amount specified by the Bureau for any and all commercial vehicles that will be used for transport activities.

Vehicles used for transporting cannabis goods must contain a box that can be locked and that is secured to the inside of the vehicle or trailer. Cannabis goods must be locked in the box during transport. The vehicle and/or trailer must be locked and secured when left unattended. The vehicle may not be left unattended or parked overnight in a residential area if it contains cannabis goods.

Only licensed distributors and their employees may be in a commercial vehicle while transporting cannabis. Only persons aged 21 years or older may be in the transport vehicle.

Distributors will be required to complete and transmit shipping manifests to the Bureau and the licensee receiving the shipment for every shipment prior to transport. Bureau regulations will detail the information required in shipping manifests. The regulations also specify distribution-specific records that must be kept by distributors. Distributors also will be required to enter required information regarding transport shipments into the State's track-and-trace database.

Testing and Quality Assurance

The regulations will describe the responsibilities of licensed distributors with respect to the testing and quality assurance of cannabis goods.

After taking physical possession of a cannabis batch, a distributor will contact a licensed testing laboratory to arrange for testing, unless the distributor plans to sell the batch to another distributor. At that point, a laboratory agent will come to the distributor's licensed premises to take a sample. The sample selection will be recorded on video, and both the distributor and the laboratory agent must witness and attest to the sample selection.

After the sample has been tested, the testing laboratory will provide the distributor with a certificate of analysis. If a sample passes testing, the distributor may transport the cannabis goods to one or more retailers for sale. If a harvest batch fails testing, it can be remediated for use in a manufactured product, if doing so would not result in harm to consumers.

The distributor will complete several quality assurance steps before distributing the batch for sale. The distributor must check that the certificate of analysis corresponds to the batch tested; the label is accurate; the packaging meets required standards; and the proper information is in the State's track-and-trace database.

Other Requirements

The Bureau's regulations will specify other requirements that apply to distributors, including insurance requirements, inventory log specifications, and track-and-trace requirements.

2.2.4 Retailers

The Bureau's regulations applying to retailers will address activities of, and requirements for, licensed retailers of cannabis goods.

Premises

The regulations will include provisions pertaining to use of and access to retailer premises. Medicinal cannabis customers must be over the age of 18 and have a valid physician's recommendation to enter the premises. Adult-use cannabis customers must be over the age of 21 to enter the premises.

The regulations will place additional restrictions on limited-access areas. Individuals entering the limited-access areas who are not retailer employees must be at least 21 years old and must be accompanied by an employee at all times. The retailer must also keep a log of these individuals, to be made available to the Bureau upon request. Retailers may not receive consideration or compensation for allowing individuals to enter a limited-access area.

Retailers will be prohibited from subletting any portion of the licensed premises of the retailer's premises.

Retail Sale

The regulations will address aspects of the retail sale functions of retailer licensees. Only customers with a valid physician's recommendation or their primary caregivers may purchase from M-license retailers, after the licensee has verified that the person possesses a valid physician recommendation and valid identification. Primary caregivers must also have valid written documentation of their primary caregiver relationship. Only customers over the age of 21 may purchase from A-license retailers. A-license retailers must verify that such customers possess valid identification.

Bureau regulations will allow retailers to sell cannabis goods only between certain hours, to be set by the Bureau. The regulations will establish security measures for the hours when the retail premises is not open for retail sales, such as use of commercial-grade locks and an alarm system. During nonbusiness hours, only authorized employees and contractors may be on the premises.

Cannabis goods may be displayed only in the retail area, and only during business operating hours. Cannabis goods may not be displayed where visible from outside the premises. Cannabis goods also may not be displayed in such a manner that they are readily accessible to customers. Retailers may display only a limited amount of cannabis goods in the retail area. Cannabis goods may be removed from their packaging and placed in containers for customer inspection. Any cannabis goods removed from their packaging for display may not be sold or

consumed; rather, they will be destroyed in accordance with regulations when no longer being used for display.

Retailers may not provide free samples to anyone or allow representatives of other companies or organizations to provide free samples on the licensed premises.

Retailers must receive cannabis goods only from licensed distributors. Cannabis goods must be packaged and labeled for final sale at the time the retailer receives them.

Following a sale, the retailer must place cannabis goods in an opaque exit package before the customer leaves the retailer premises.

Delivery

A retailer may deliver cannabis to qualified patients and primary caregivers aged 18 years or older or to adults aged 21 years and older. Deliveries may be made only by employees of licensed retailers who are aged 21 years and older. Delivery employees may not consume cannabis during delivery.

Deliveries must be made to physical addresses within the state of California and may not be made on public lands or buildings leased by public agencies. Deliveries may be made only in person by enclosed motor vehicle. Cannabis goods may not be visible to the public during deliveries. Cannabis goods may not be left in an unattended motor vehicle unless the vehicle has an active alarm system. Vehicles used for delivery must have a dedicated, active GPS device that enables the dispensary to identify the geographic location of the vehicle during delivery. While making deliveries, a delivery employee may not carry more than a specified amount of cannabis goods at any time.

Retailers that deliver cannabis goods must keep records related to the cannabis goods delivered and the vehicles used for delivery services.

Inventory and Records

The Bureau's regulations will regulate the storage, receipt, documentation, and reconciliation of inventory, and the sales records that retailers must keep under MAUCRSA.

Retailers may receive shipments of inventory only from licensed distributors. Retailers may not receive cannabis goods through public entrances or exits.

Retailers must keep accurate records of inventory, including information identifying the products, their quantity, and their sell-by or expiration date. Retailers must also keep records of when the product was received and the distributor from which the retailer acquired the products. Retailers must reconcile inventory at specific intervals and report discrepancies to the Bureau and law enforcement.

Retailers must keep records of all sales transactions, including the names of the sales employee and the customer, the list and quantity of products sold and their price, and the date and time of the transaction.

Other Requirements

The Bureau will detail additional requirements for retailers. Retailers must enter required information concerning receipt, sales, and returns of cannabis goods into the State's track-and-trace database. In addition, retailers are required to notify law enforcement within 24 hours if they identify a discrepancy in their inventory or if they have reason to suspect diversion, theft, or other criminal activity.

The Bureau's regulations will include a grace period for compliance with packaging and testing requirements. During the grace period, retailers may package and sell cannabis goods that have not been packaged by a cultivator or distributor. In addition, during the same time frame, retailers may sell untested cannabis if they place a label on the package with the date of purchase and the statement, "This product has not been tested under the Medicinal and Adult-Use Cannabis Regulation and Safety Act."

2.2.5 Testing Laboratories

The Bureau's regulations will require that in addition to the regulations that apply to all Bureau licensees, summarized above in Section 2.2.2, cannabis testing laboratories must comply with the additional requirements set forth in its laboratory regulations.

Chapter Definitions

The regulations will define key terms used throughout the laboratory testing regulations. For example, terms such as "primary sample," "quality-control sample," and "proficiency test sample" will be clearly defined to clarify for the reader how the Bureau regulates sampling and testing procedures. Various cannabis-specific terms, such as "cannabinoid," "CBD," "CBDA," and "hashish," will be defined to assist the reader in understanding usage of cannabis terminology in the context of the regulations. In addition, technical testing terms such as "matrix spike sample," "method blank," and "action level" will be defined for the reader.

License Application

The regulations will contain provisions regarding testing laboratory license applications. In addition to the standard licensing requirements described above in Section 2.2.2, laboratories will be required to submit additional information, including proof of International Organization for Standardization (ISO) 17025 accreditation or proof that the applicant is in the process of applying for accreditation, laboratory employee qualifications, standard operating procedures, and a premises diagram containing a description of the activities that take place in each space.

Sampling of Cannabis Goods

The regulations governing sampling of cannabis goods will describe the processes and standards for selecting, gathering, storing, preparing, and analyzing samples of cannabis goods. The regulations will require licensed laboratories to develop and implement sampling plans that must be approved by the laboratory director and made available to all laboratory personnel.

Laboratory personnel will be required to keep a detailed field log for recording information during sampling events. The log must contain information regarding the sampling laboratory, distributor, sample taken, and conditions under which the sample was taken. In addition, laboratories will be required to develop and implement a chain-of-custody protocol to ensure accurate documentation of the transport, handling, storage, and destruction of cannabis samples.

The regulations will detail requirements for sampling procedures for unpackaged harvest batches and for packaged cannabis goods. For each of these categories, the regulations will specify the requirements for collecting samples, the sample size, and the number of sample increments.. The regulations also will require that laboratory personnel collect a duplicate field sample in addition to the primary sample.

Finally, the regulations will detail various factors that may cause a sample to be rejected. Some of the factors that may cause a laboratory to deem a sample "compromised" and therefore reject it, include a broken shipping container; evidence that the sample has been tampered with, adulterated, or contaminated; a missing or incomplete chain-of-custody form or field log; or indications that the temperature of the sample is out of the required range.

Standard Operating Procedures

The regulations will require testing laboratories to develop, implement, and maintain standard operating procedures for distinct aspects of their operations, including laboratory processes, analytical methods, and testing methodologies. For laboratory processes, the standard operating procedure will include items such as calibration and maintenance of equipment and instruments; chain-of-custody protocols; employee training; security; recordkeeping; and sample preparation, storage, and disposal. The standard operating procedures for analytical methods will describe how the laboratory performs each testing method. The procedures will include elements such as lists of analytes; applicable matrices; method sensitivity; potential interferences; analytical instruments; consumable supplies, reagents, and standards; sample preservation and hold time; types, frequency, and acceptance criteria for quality control samples and calibration standards; and calculation of results. For testing methodologies, the standard operating procedures must conform to a valid testing methodology guideline such as the U.S. Food and Drug Administration's *Bacterial Analytical Manual* (2016) or AOAC International's *Official Methods of Analysis for Contaminant Testing of AOAC International* (2016). Laboratories may use nonstandard methods if they are validated in accordance with the processes set out in these regulations.

Laboratory Analyses and Reporting

The regulations will define the types of analyses that testing laboratories must perform for samples. These include analyses for cannabinoids, contaminants such as filth, and foreign material, and water activity.

Laboratories will be required to test samples for cannabinoid content. The cannabinoids that are required to be tested for are tetrahydrocannabinol (THC), tetrahydrocannabinolic acid (THCA), cannabidiol (CBD), cannabidiolic acid (CBDA), cannabigerol (CBG), and cannabinol (CBN). For each of these cannabinoids, laboratories must report the concentration. They may also test for other cannabinoids at the election of the test requester.

Laboratories will be required to analyze samples of manufactured cannabis goods for residual solvents and processing chemicals. Dried flower, kief, and hashish need not be analyzed for residual solvents. The regulations will provide a table of residual solvents and "action levels" for cannabis goods. In the table, action levels will be specified for products intended for inhalation, as well as for cannabis-infused goods. Laboratories must report the solvents and processing chemicals listed in this table in parts per million. Detection of solvents or processing chemicals above the action levels will result in failure for testing purposes.

Testing laboratories will be required to test samples for residual pesticides. The regulations will provide a list of pesticides that must be tested for, as well as maximum amounts of pesticide residues that may be found in edible cannabis products, dried cannabis flowers, and all other processed cannabis, in parts per million. If a testing laboratory detects pesticide levels higher than the regulations allow, the sample fails testing.

Laboratories will be required to test samples of cannabis and cannabis products for microbiological impurities, which will include Shiga toxin-producing *Escherichia coli* and *Salmonella* spp. Laboratories must also test for the pathogenic species *Aspergillus funigatus, A. flavus, A. niger,* and *A. terreus* in all cannabis goods intended for consumption by inhalation, including dried flower, kief, hashish, oil, and waxes. Samples containing these microbiological impurities above the detection limit will be deemed to fail microbiological impurity testing.

Testing laboratories will be required to analyze samples for mycotoxins. The regulations will specify maximum levels for mycotoxins. The laboratory may test for additional microorganisms if a customer so requests. Samples that exceed the levels specified in the regulations fail mycotoxin testing.

Testing laboratories will analyze dried flower harvest batch samples for water activity and moisture content. Samples that do not meet the regulatory standard and fail water activity and/or moisture content testing may be returned to the cultivator for further drying and curing. All required testing of the harvest batch would then need to be repeated.

Testing laboratories will be required to test samples for filth and foreign material. This includes, but is not limited to, mold, hair, insects, feces, packaging contaminants, and manufacturing waste and byproducts. Samples that contain these contaminants above the specified action levels will fail laboratory testing.

Laboratories may be required to analyze samples for concentrations of heavy metals. Samples tested for heavy metals will pass testing if the concentrations of these heavy metals are below the action levels specified for the particular product.

If a cultivator's, manufacturer's, or distributor's product labeling says that the sample contains discrete terpenes, the laboratory will be required to test for those terpenes and report their concentration. The requester of the laboratory test may also request measurement of specific terpenes.

After completion of testing, the testing laboratory will issue a certificate of analysis that details the results of each test. The certificate of analysis will also report whether the laboratory detected any unknown or unidentified substances or materials during analysis of a sample. If the laboratory finds a contaminant that is not listed in these regulations that could

be injurious to human health at the levels detected, the laboratory must notify the Bureau within 24 hours. Samples found to contain synthetic cannabinoids will fail testing. The certificate of analysis will also state whether the sample passed or failed testing. If the sample passes testing, the laboratory will enter that information into the track-and-trace database, and the batch from which the sample was taken may be released for retail sale. If the sample fails testing, the laboratory will upload a copy of the certificate of analysis into the track-and-trace database.

Post-Testing Procedures

The regulations will specify post-testing procedures for instances where a batch fails testing. A batch may not be retested unless it has undergone a remediation process. Before a batch can be retested, the distributor must provide a document to the laboratory specifying how the product was remediated.

Testing laboratories will be required to destroy nonhazardous waste from cannabis samples according to specific destruction provisions. Additionally, as with all licensees, testing laboratories must dispose of hazardous waste containing cannabis in accordance with applicable federal and State hazardous waste laws.

Quality Assurance and Quality Control

Testing laboratories will be required to develop and implement a laboratory quality assurance program that includes the following items: quality control procedures; laboratory organization and personnel; quality assurance objectives for measurement data; traceability of data and analytical results; equipment preventive maintenance; equipment calibration; performance and system audits and corrective action; quality assurance recordkeeping; standardization of testing procedures; and method validation.

Laboratories will also be required to run quality control samples as specified by the Bureau. The regulations will detail parameters for using method blank samples, field duplicate samples, matrix spike samples, and reference material.

Testing laboratories will be required to calculate the limits of detection and the limits of quantitation for quantitative analytical methods. Laboratories can use signal-to-noise ratio, the standard deviation of the response and the slope of the calibration curve, or another method published by the U.S. Food and Drug Administration or the U.S. Environmental Protection Agency.

The regulations will require the testing laboratory to prepare a data package for each batch of samples it analyzes. The data package will contain identifying information about the laboratory and the personnel that performed the analysis, sample and quality control sample results, raw data for each sample, instrument test method with parameters, instrument tune report, calibration data, test method worksheets, quality control report, analytical batch sample sequence, field sample log and chain-of-custody forms, and certificate of analysis. The laboratory director will review and verify the analyses in the data package and approve the results.

The regulations will specify a series of requirements for laboratories to perform proficiency testing. Laboratories that cannot demonstrate successful performance in the required

proficiency testing must take and document corrective actions. Failure to participate in a proficiency test may result in disciplinary action.

Testing laboratories will conduct an internal audit at least annually, or as required by the ISO accrediting body. Audit results must be submitted to the Bureau.

Laboratories are required to maintain records relating to the following categories for a minimum of seven years: personnel qualifications; method verification and validation; quality control and quality assurance; chain of custody; purchasing and supply; installation, maintenance, and calibration of laboratory equipment; customer service; nonconforming work and corrective action; internal and external audits; management review; laboratory data reports, data review, and data approval; proficiency testing; electronic data and security; data on traceability, raw data, calibration, and log books; and laboratory contamination and cleaning.

Employee Education and Experience Requirements

The regulations will outline the minimum qualifications and training required for specific employment positions at testing laboratories. The regulations will require that laboratories verify and maintain documentation of employees' qualifications.

Premises Security

Certain security requirements will be imposed on testing laboratories. Security provisions applying to all licensed commercial cannabis business premises are described above in Section 2.2.2; the regulations will detail additional security provisions that apply specifically to testing laboratories. In addition to the security provisions applicable to all licensed cannabis businesses, the regulations will provide that laboratories must implement an access control card system through all access control points that records the transaction history of entrants. Laboratories must also maintain a log of visitors. Laboratories must have secured storage for test samples; cannabis waste; reference standards for analysis of cannabinoids; controlled substances related to cannabinoids; and records of analytical tests, including certificates of analysis and data packages. Additionally, laboratories must implement password protection for electronically stored data. Laboratories must notify the Bureau in the event of unexplained losses of cannabis or cannabis product samples.

2.2.6 Microbusiness

A microbusiness license allows the licensee to cultivate cannabis in an area of less than 10,000 square feet and to act as a licensed distributor, Level 1 (nonvolatile solvent) manufacturer, and retailer. (Bus. & Prof. Code §26070.) For both medicinal and adult-use cannabis operations, CDFA is the licensing authority for stand-alone cannabis cultivation activities and CDPH is the licensing authority for stand-alone cannabis manufacturing activities.

With regard to distribution and retail sale, the regulations applicable to those activities are anticipated to be the same for a microbusiness as for a standalone business. For cultivation activities, it is expected that applicants will be required to follow applicable provisions of the cultivation regulations that will be adopted by CDFA for cannabis cultivation, and CDFA is

anticipated to provide assistance to the Bureau related to cultivation by a microbusiness. Similarly, it is expected that microbusiness applicants conducting manufacturing activities will be required to follow CDPH manufacturing regulations, and CDPH is anticipated to provide assistance to the Bureau related to manufacturing by a microbusiness.

2.3 Activities Outside the Scope of the Proposed Program

The Proposed Program, as analyzed in this IS/ND, is limited to activities conducted in accordance with a Bureau license. As such, activities regulated under the Proposed Program do not include the following:

- Site development activities for the purposes of conducting a cannabis business licensed by the Bureau, including new construction or modifications to existing structures;
- Unlicensed cannabis business activities, such as activities not in compliance with MAUCRSA, the Bureau's regulations, or other laws and regulations;
- Noncommercial cannabis activities meeting the applicable requirements of MAUCRSA such that they are exempt from licensure;
- Activities related to cannabis that are under the licensing authority of another state agency (e.g., standalone cultivators or manufacturers) or under the jurisdiction of a local agency (e.g., county zoning plans); and
- Consumer use of cannabis or cannabis products.

These other activities are considered, as appropriate, as part of the cumulative impact analysis in Chapter 5, *Mandatory Findings of Significance*.

2.4 Intended Uses of this IS/ND

The Bureau will use the IS/ND to inform its decision whether to adopt and implement the Proposed Program, including the issuance of individual licenses for activities in compliance with the regulations.

In addition, this IS/ND may be used by other agencies to support their issuance of permits or approvals in relation to cannabis business activities or other aspects of cannabis licensing. These agencies may include, but are not limited to, the following:

- Cities and counties
- California Department of Food and Agriculture
- California Department of Public Health
- California Department of Pesticide Regulation
- State Water Resources Control Board
- California Department of Fish and Wildlife
- Regional Water Quality Control Boards (all regions)
- State Office of Historic Preservation
- California Air Resources Board
- California Department of Forestry and Fire Protection