
North Coast Regional Water Quality Control Board

July 19, 2017

Ms. Anna Birkas
Village Ecosystems
211 Clara Avenue
Ukiah, CA 95482
ab@mcn.org

Dear Ms. Birkas:

Subject: Approval of Village Ecosystems as a Third Party Program

File: Cannabis Waste Discharge Regulatory Program, Order No. R1-2015-0023

Thank you for submitting your February 8, 2016, proposal with a sample water resource protection plan via email, amended on June 18 and July 6, 2017, (Proposal), to become an approved third party program pursuant to Order No. R1-2015-0023 (Order). To serve individual dischargers as an approved third party under the Order, a prospective third party's proposal must include certain elements listed under Order section II.B to demonstrate proper technical experience and qualifications, organizational capacity and funding mechanisms, framework for compliance confirmation, and annual compliance reporting.

Staff of the North Coast Regional Water Quality Control Board (Regional Water Board) have reviewed the Proposal and concluded that it fulfills the requirements of Order Section II.B, and contains the substantive and procedural mechanisms for Village Ecosystems to serve as a third party program to fulfill all of the functions listed in Finding 21 of the Order within the geographic boundaries of the North Coast Region.

Section II.C of the Order provides: If a third party proposal is approved, the Executive Officer will send an approval letter that will identify the third party's geographic boundaries and/or applicable responsibilities for coverage of selected Tier(s). Accordingly, pursuant to Section II.C of Order No. R1-2015-0023, I hereby approve Village Ecosystem's proposal to be a third party program, with coverage throughout the North Coast Region, to assist Tier 1 and Tier 2 dischargers to comply with the Order. Your program may also assist

Tier 3 sites with development of cleanup and restoration plans and implementation of those plans upon approval by the Regional Water Board or its Executive Officer.

This approval is conditional and subject to a probationary period, and may be revoked at any time for failure to adequately implement the Cannabis Waste Discharge Regulatory Program (Program) as described in the approved Proposal. The Regional Water Board will add your name (and contact info) to the list of approved third parties to its website here: http://www.waterboards.ca.gov/northcoast/water_issues/programs/cannabis/

Your participation as an approved third party program increases the Program effectiveness and administrative efficiency of the Order. Regional Water Board staff looks forward to working with you. The State Water Resources Control Board recently provided a Notice of Opportunity for Public Comment on a *draft General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* that if adopted would supersede Order No. R1-2015-0023. Therefore, it is important to note that the role of third party programs may change and this approval may be temporary. If you have any questions, you may contact Kason Grady at (707) 576-2682 or kason.grady@waterboards.ca.gov.

Sincerely,

Matthias St. John
Executive Officer

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