

From: [Benjamin](#)
To: [commentletters](#)
Subject: Cannabis General Order
Date: Wednesday, August 30, 2017 2:55:05 PM



Dear State Water Resources Control Board,

My name is Benjamin G Berman-Brady. I am a resident of Trinity County, CA and am currently enrolled in the North Coast Regional Water Quality Control Board's Order No. R1-2015-0023, as a Tier 2 Discharger with WDID # 1A161610CTR1. I have been enrolled since 11/17/2016.

As a Tier 2 Enrollee, I was required to establish and maintain a Water Resource Protection Plan (WRPP) that details the steps necessary for my cultivation operation to establish Standard Conditions under the NCRWQCB Order within five years. To date, I have spent at least \$6,000 towards implementation of my WRPP.

The requirements in the proposed SWRCB Cannabis General Order would impose significant additional expenses that could make my continued operation untenable. In many cases, these additional requirements are redundant to water resource protections already contemplated by the NCRWQCB Order.

It is my belief that viable, small-scale cannabis cultivation is an integral part of the environmental recovery and long term sustainability of Trinity County and the North Coast Region in general. I believe the NCRWQCB carefully weighed these factors when drafting and implementing its Order and urge the State Water Resources Control Board to defer to this regional expertise and locally appropriate solution.

It is important to note that while recent state legislation exempts the SWRCB Cannabis General Order from the requirements imposed by the California Environmental Quality Act, the NCRWQCB Order was implemented only after completing a thorough CEQA analysis including Notice and Comment. In light of that environmental review, I believe that the NCRWQCB Order is protective of water quality in the Region and should be continued for its intended 5-Year duration.

I believe that the Regional Water Boards are well positioned to evaluate conditions within the nine regions and where the SWRCB General Order conflicts with a Regional Order, the General Order should defer to the local expertise of the Regional Boards. Ideally the SWRCB General Order should allow the Regional Boards to retain enough flexibility to implement locally appropriate solutions that are equally protective of water quality.

At a minimum, I believe that current Enrollees under a Regional Order should be allowed to continue operating for the duration of the Regional Order.

Thank You for your time and consideration.

Sincerely,

Benjamin G Berman-Brady