

From: [adrien keys](#)
To: [commentletters](#)
Subject: comment letter-cannabis general order
Date: Tuesday, September 5, 2017 10:18:58 AM



Dear State Water Resources Control Board-

My name is Adrien Keys, I am a Trinity County resident, and am currently enrolled in NCRWQCB order #R1-2015-0023. My WDID is 1A16093CTRI. My date of enrollment is 2-9-16.

As a tier 2 enrollee, I have established and maintained a WRPP that details the necessary steps for my cultivation operation to comply with the standard conditions under the NCRWQCB within five years.

The requirements in the proposed SWRCB Cannabis General Order would impose significant additional expenses that threaten the viability of my operation. In many cases, these additional requirements are redundant to water resources already included in the NCRWQCB Order.

I believe that small scale cannabis cultivation is an integral part of 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 SWRCB to defer to this regional expertise and locally appropriate solution.

It is important to note that while recent state legislation exempts 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 & 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 the Regional Water Boards are well positioned to evaluate conditions within the nine regions 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 the 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,
Adrien Keys