

From: Sam Rodriguez  
To: Schultz, Daniel@Waterboards; erik.ekdahl@waterboards.ca.gov; Aquino, Nancy@Waterboards  
Cc: John.DeFriel; Matthew.Allen; Sam.Rodriguez; Sam.Rodriguez  
Subject: Mandate RE: Water Board Winterization Requirements for Cannabis Growers  
Date: Monday, November 26, 2018 9:02:00 AM



Attention: Dan, Erik and Nancy

Hope your Thanksgiving was relaxing and enjoyable with family and friends.

As you are aware, many cannabis operators are racing to be 100% compliant with all the local, county, regional and state governmental agencies that are issuing new regulations and rules. This is has NOT been an easy task for many in the industry, as you know some have failed and no longer are operating or worse pursuing activities in the black market, Central Coast Agriculture (CCA), from the beginning worked in close partnership with Santa Barbara County in developing a robust cannabis cultivation program and is a role model of compliance.

We greatly appreciate our initial meet and greet meeting a couple of months ago in Sacramento and now we would like to follow up with an "**urgent request**" to meet again or have alternative conference call to better understand "**the water board winterization requirements for cannabis farmers dated October 8th**" of this year (see below).

As we shared with you all when we last met, our most serious concerns stem from oversight agencies developing new rules impacting farmers who for years always followed existing farming guidelines for non-cannabis agricultural crops.

There's a natural order for planting, toiling and nurturing cannabis farming and we are afraid that these new rules will have unintentional negative impacts on current procedures and hurt our bottom-line operations to compete in the marketplace.

We look forward to discuss this issue and given that John De Friel, also has a leadership role with the County, we would facilitate a larger venue with like-minded growers as well, if needed.

Thanks in advance for your attention to this urgent matter.

Best always,

Sam

From: "Cannabis, CentralCoast" <centralcoast.cannabis@Waterboards.ca.gov>  
Date: October 8, 2018 at 11:01:12 AM PDT  
Subject: Water Board Winterization requirements for Tier 1 and Tier 2 cannabis growers

Attention Cannabis Cultivator,

The Central Coast Water Board's [Cannabis Cultivation Regulatory Program](#) is sending a reminder that the winterization requirements will soon be in effect for all Tier 1 and Tier 2 cannabis growers. Winterization requirements for Monterey, Santa Clara, and Santa Cruz Counties are in effect from October 15<sup>th</sup> – April 15<sup>th</sup>. Winterization for all other counties in the Central Coast Region are from November 15<sup>th</sup> to April 1<sup>st</sup>.

Water Board staff will be conducting inspections throughout the region to assess compliance with the winterization requirements.

#### What is Winterization?

Winterization involves implementing practices on the cultivation site that minimize the potential for the discharge of sediment or contaminants during winter rain events. The requirements for winterization are outlined starting on page 47 in Attachment A of the [Cannabis General Order](#).

#### Requirements for all Tier 1 and Tier 2 Cultivators (Low, Medium, and High Risk)

1. Implement all applicable Erosion Control and Sediment and Soil Management Requirements

Sam Rodriguez  
Consultant/Lobbyist and Media Advisor  
Rodriguez Strategic Partners LLC

[www.rodriuezstrategicpartners.com](http://www.rodriuezstrategicpartners.com)  
916.849.4300 (cell/text)

"Science and everyday life cannot and should not be separated" - Rosalind Franklin, Scientist and Chemist - discovery of the structure of DNA, pioneering use of X-Ray diffraction.