

GODDESS ORGANICS

**SITE MANAGEMENT PLAN
HUMBOLDT COUNTY, CA**

APN: 208-113-008

WDID #: 1_12CC403054

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Table of Contents

Purpose	3
Project Description	3
Cultivation Areas	3
Methods	4
Tier and Risk Designation	4
Addendum to Water Resource Protection Plan	5
Reference Materials	7

Purpose

This Site Management Plan (SMP) has been prepared on behalf of the cannabis cultivator for the Humboldt County property identified as assessor parcel number 208-113-008, by agreement and in response to the State Water Resources Control Board Cannabis Cultivation Policy (Cannabis Policy), in congruence with Order WQ 2019-0001-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (General Order). The General Order implements the Cannabis Policy requirements, specifically those requirements that address waste discharges associated with cannabis cultivation activities.

Dischargers registered as Tier 1 or 2 Cannabis Cultivators are required to submit and implement a Site Management Plan describing how they are complying with the requirements listed in Attachment A of the General Order. This SMP describes how the cultivator is implementing the Best Practical Treatment or Control Measures (BPTC), as a supplemental document to the Water Resource Protection Plan (2017) completed for this project to comply with North Coast Regional Water Board Order No. R1-2015-0023.

Project Description

This 39-acre parcel is in the Little Larabee Creek watershed and lies at approximately 1,500 feet elevation. The parcel is located off of CA-Hwy 36, over 3 miles down Little Larabee Creek Rd, a private access road. The parcel is located to the south of Little Larabee Creek. Little Larabee Creek runs west just outside the northern property line, an unnamed Class III runs towards the northwest property corner, and an unnamed Class II runs north outside the eastern property line. This Class II waterway is one of the sources of irrigation and domestic water on the parcel.

This operation is classified as Tier 1 low risk.

Since the issuance of the Water Resource Protection Plan (WRPP) for APN 208-113-008 on October 4th, 2017, operators have implemented necessary remediations in order to meet the standard conditions for a Tier 1 commercial operation. Remediations included the replacement of three pit-style outhouses with temporary portable toilets, adequate containment/reuse of spoils piles, implementation of necessary drainage, and implementation of erosion control measures at the outlet of the culvert.

Cultivation Areas

Please reference the most recent sitemap submitted to the Humboldt County Planning Department for the current updated depiction of cultivation areas and parcel layout.

Methods

This SMP has been developed by license holder and property owner, Mika Cook, as an Addendum to the Water Resource Protection Plan (WRPP) completed by Natural Resources Management (NRM) for compliance with the North Coast Regional Water Board Order No. R1-2015-0023 on October 4, 2017. In addition to holding a bachelor's degree from the University of California, Berkeley, in Conservation Resource Studies, Mika Cook works as a Cannabis compliance consultant, advising commercial licensees regarding the current California licensed Cannabis regulatory landscape.

The primary methods used to develop this SMP were analysis of the completed WRPP, and on-site data collection and analysis. These methods of analysis, coupled with a review of a variety of historical mapping datum, provided the information conveyed in the following sections. Analyzed historical data included USGS, USDA FSA, Humboldt County GIS, and ESRI maps. Project related documents analyzed for the purpose of this SMP included an updated version of the site map, a complete Biological Report, and a CDFW approved Lake and Streambed Alteration Agreement. The on-site data collection component included photographs and descriptions of relevant site-specific conditions including but not limited to, access roads, stream crossings, drainage features, and disturbed areas. Areas were evaluated for discharges and related controllable water quality factors and standard operating procedures were assessed in conjunction with Attachment A of the General Order.

Tier and Risk Designation

Tiers are defined by the amount of disturbed area. As defined in The General Order, Disturbed Area, or "Land Disturbance" includes areas where natural plant growth has been removed whether by physical, animal, or chemical means, or natural grade has been modified for any purpose. Land disturbance includes all activities whatsoever associated with developing or modifying land for cannabis cultivation related activities or access.

Tier 1 outdoor commercial cultivation activities disturb an area equal to or greater than 2,000 square feet and less than 1 acre (43,560 square feet). Tier 2 outdoor commercial cultivation activities disturb an area equal to or greater than 1 acre. Risk designation is based on the slope of disturbed areas and the proximity to a surface water body.

According to the Notice of Receipt from the State Water Resources Control Board for the Cannabis General Order Application Number: 1_12CC403054 the property will be processed as a Tier 1 Low Risk site. As was reported in the Initial Enrollment, no portion of the disturbed area is within the setback requirements, no portion of the disturbed area is located on a slope greater than 30 percent, and the cannabis cultivation area is less than or equal to 1 acre.

Addendum to Water Resource Protection Plan

The following list reflects the current condition on the subject parcel, as they have changed since the WRPP was written, and as they relate to the State General Order. Items 1-7 below correspond to items 1-7 listed in the Corrective Actions portion of the WRPP (pg. 10).

1. Two cross-road drains were installed during fall of 2017 and late spring of 2018 in the form of rolling dips, to prevent future erosion—one before the bank of 5 water tanks (“the tank farm” as it is described in the WRPP), and another before the last turn before reaching Area A (“Cultivation area 2” as it is described in the WRPP).
2. The abandoned trailer adjacent to Area A (“Cultivation Area 2,” as it is described in the WRPP), was demolished and all associated waste materials were either recycled on-site or hauled off-property and disposed of at a proper waste facility.
3. Soils left over from the previous landowner in Area D (“Cultivation Area 4,” as it is described the WRPP), were remediated and reused for cultivation in 2017.
4. The three pit-style outhouses constructed by the previous landowner were decommissioned and replaced by three regularly serviced portable toilets in 2018.
5. Remediation of improper drainage on the flat that contains Areas 1B-6B (“Cultivation Area 2,” as it is described in the WRPP), was completed during the end of the dry season in October 2019, based on recommendations from David Nicoletti from DTN Engineering and Allan Baird from A.M. Baird engineering.
6. Placement of rock armoring was completed on an appropriately sized 24” culvert identified in the WRPP completed by NRM in 2017. This work was completed in accordance with remediation measures provided in both the Lake and Streambed Alteration Agreement with CDFW and 401 permit issued by the SWRCB.
7. The well located along the western property line did not require a project notification by CDFW as part of the Lake and Streambed Alteration Agreement permit process.

Materials Referenced

- A. Site Map for APN 208-113-008
- B. Water Resource Protection Plan (WRPP)
- C. Lake and Streambed Alteration Agreement (LSAA)
- D. Biological Report