

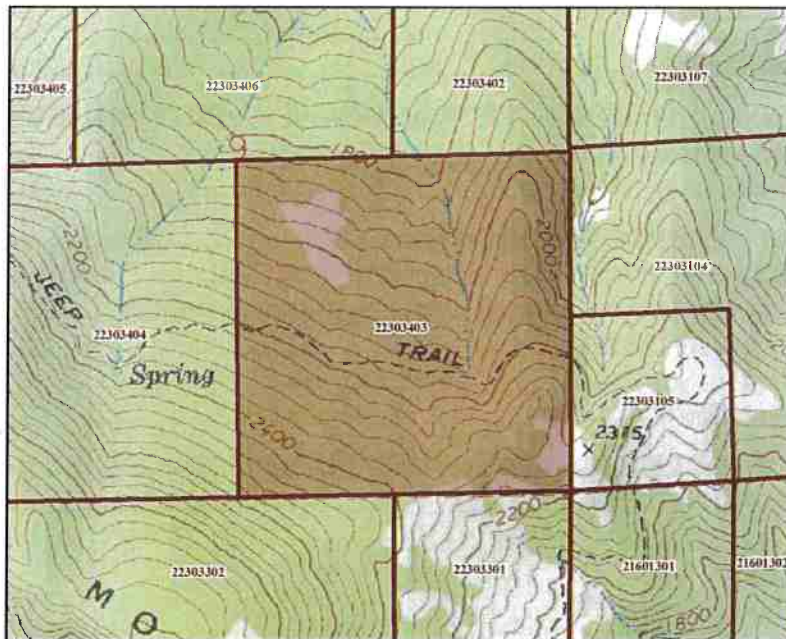


**Site Management Plan  
Technical Report  
Order WQ 2019-0001-DWQ**

*For*  
**APN 223-034-003**

*Located at*  
**1055 State Highway 101  
Garberville, California**

**September, 2019**



*Prepared for:*  
Danny Ballard, Landowner/Operator  
Cannabis General Order Application Number: 420000  
1055 State Highway 101, Garberville, CA

*Prepared by:*  
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**Site Management Plan (SMP)**  
**APN 223-034-003**  
**1055 State Highway 101, Garberville, California**

**I. INTRODUCTION AND PROJECT SUMMARY**

Tier 1 and Tier 2 Dischargers enrolled in the State Water Resources Control Board (SWRCB) Cannabis Cultivation Policy Order WQ 2019-0001-DWQ, General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (General Order) shall submit and implement a Site Management Plan (Plan) that describes how the Discharger is implementing the Best Practical Treatment or Control (BPTC) measures listed in Attachment A of the State Water Resource Control Board's Cannabis Cultivation Policy (approved April 16, 2019). The Plan may include a schedule to achieve compliance, but all work must be completed by the onset of winter period each year. (The due date does not relieve a Discharger from implementing the interim soil stabilization BPTC measures described in Attachment A.)

This report comprises Pacific Watershed Associate's (PWA) Site Management Plan (Plan) for Humboldt County APN 223-034-003 located off Reed Mountain Road, Garberville, CA, as shown on Figure 1. This property is located approximately 4.4 miles southeast of Benbow, Humboldt County, CA, and hereinafter is referred to as the "Project Site."

The Project Site cultivator ("Discharger") has transferred enrollment in the North Coast Regional Water Quality Control Board Order R1-2015-0023 to the State Water Resources Control Board (SWRCB) Cannabis Cultivation Policy Order WQ 2019-0001-DWQ, General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (General Order). A Water Resource Protection Plan (WRPP) was prepared and produced for the Discharger by PWA, based on our January 2017 site inspection, and is included as a supplemental attachment to this document. Several remedial measures recommended in the WRPP to comply with the Standard Conditions of the Regional Water Quality Control Board's Order have already been implemented by the landowner.

Based on the total disturbance area, slopes of disturbed areas, and riparian setbacks, this property has been enrolled under the General Order as **Tier 2 Low Risk**. Properties that fall into Tier 1 or 2 of the General Order are required to develop a Site Management Plan (SMP). This SMP has been developed for the Discharger based on site inspections made by PWA on the Project Site and references the remedial actions identified in the existing WRPP pertaining to the Project Site. PWA's recommendations for any remediation or corrective actions are a result of water quality requirements under the General Order, including Best Practical Treatment or Control (BPTC) measures designed to meet those requirements. This Plan documents the findings of subsequent site visits and inspections conducted in 2017 including a reconnaissance level investigation of the property was conducted and a site conditions assessment for the development of the WRRP.



## **II. CERTIFICATIONS, LIMITATIONS AND CONDITIONS**

This Plan has been prepared by, or under the responsible charge of, a California licensed geologist at PWA and all information herein, including treatment recommendations, are based on observations, data and information collected by PWA staff.

This Plan has been prepared to: 1) provide specific BPTC measures to be utilized on the Project Site to minimize potential threats to water quality; 2) provide itemized remedial actions to be taken on the Project Site to correct existing or potential water quality threats or impacts and meet the general waste discharge requirements of the General Order; and 3) provide a revised schedule for the implementation of the itemized remedial actions. The analysis and recommendations submitted in this Plan and attached WRPP are based on PWA's evaluation of the Project Site and activities which fall under the General Order.

In this Plan and attached WRPP, we have described the recent and current conditions of the Project Site and any water resource and water quality risk factors we observed during our site inspections. PWA is not responsible for problems or issues we did not observe on our site inspections, or for changes that have naturally occurred or been made to the property after our site review. The interpretations and conclusions presented in this Plan are based on reconnaissance level site investigations of inherently limited scope. Observations are qualitative, or semi-quantitative, and confined to surface expressions of limited extent and artificial exposures of subsurface materials. Interpretations of problematic geologic, geomorphic or hydrologic features such as unstable hillslopes, erosional processes and water quality threats are based on the information available at the time of our inspection and on the nature and distribution of existing features we observed on the property.

We have also included a schedule of itemized remedial actions that are based on these observations. The remedial actions provided in this Plan have been developed from professional opinions derived in accordance with current standards of professional practice, and are valid as of the date of the most recent or most applicable field inspection. No other warranty, expressed or implied, is made. Furthermore, to ensure proper applicability to existing conditions, the information and remedial actions contained in this report shall be regularly reevaluated and it is the responsibility of the landowner and/or lessee operating under the General Order to ensure that no remedial actions or recommendations are inappropriately applied to conditions on the property that have changed since the recommendations were developed.

If site conditions have changed for any reason, the Project Site should be reevaluated and the Plan and associated recommendations revised and updated as required. These conditions include any changes in land management activities or property conditions that have occurred since our site visit (regardless of what they are, how they occurred or who performed them). Similarly, if the landowner/lessee uses portions of this property not identified or covered under the current Plan, this Plan will need to be updated with the new information, including possible additions or changes to the recommended remedial or corrective actions and BPTCs.

The person, persons, business or other entity listed as the enrollee under the General Order is responsible for complying with all the requirements thereunder, including the WRPP and related

recommendations and requirements, regardless of who is operating or cultivating on that Project Site. If the enrollee is not the sole landowner and fails to comply with the Order and its requirements, the landowner or remaining landowners will automatically assume responsibility for the requirements therein, including all related penalties or actions brought by the SWRCB and/or NCRWQCB.

If at any time in the future the property is to transfer ownership, it is the responsibility of the current owner(s), or their representative(s), to ensure that the information and recommendations contained herein are called to the attention of any future owner or agent for the property. Unless this Plan is modified by the SWRCB or NCRWQCB, the findings and recommendations contained in this Plan shall be utilized as a tool while implementing the Plan remedial actions. Necessary steps shall be taken to see that contractor(s) and subcontractor(s) carry out such recommendations in the field in accordance with the most current Plan and BPTC standards.

PWA will be responsible for the data, interpretations and recommendations developed by PWA, but will not be responsible for the interpretation by others of that information, for implementation of corrective actions by others, or for additional or modified work arising out of those plans, interpretations and recommendations. PWA assumes no liability for the performance of other workers or suppliers while following PWA's recommendations in the Plan, unless PWA is under contract to perform or oversee those activities. Additionally, PWA is not responsible for changes in applicable or appropriate standards beyond our control, such as those arising from changes in legislation or regulations, or the broadening of knowledge which may invalidate or alter any of our findings or recommended actions.

Any Plan review or construction management services that may be needed or identified in the recommendations sections of this Plan are separate tasks from the preparation of this Plan, and are not a part of the contract under which this Plan was prepared. If requested, additional PWA field inspections, surveys, Plan revisions/updates, project layout, design, permitting, construction oversight/management, or other related services arising from tasks described and recommended in the Plan may be performed under separate agreements requiring advance notice and contracting.

PWA's services consist of professional opinions and recommendations made in accordance with generally accepted principles and practices. No warranty, expressed or implied, or merchantability or fitness, is made or intended in connection with our work, by the proposal for consulting or other services, or by the furnishing of oral or written reports or findings. This Plan, as written or as modified in writing, takes precedence over all other communication. If the client desires assurances against project failures, they shall obtain appropriate insurance through their own insurance broker or guarantor.

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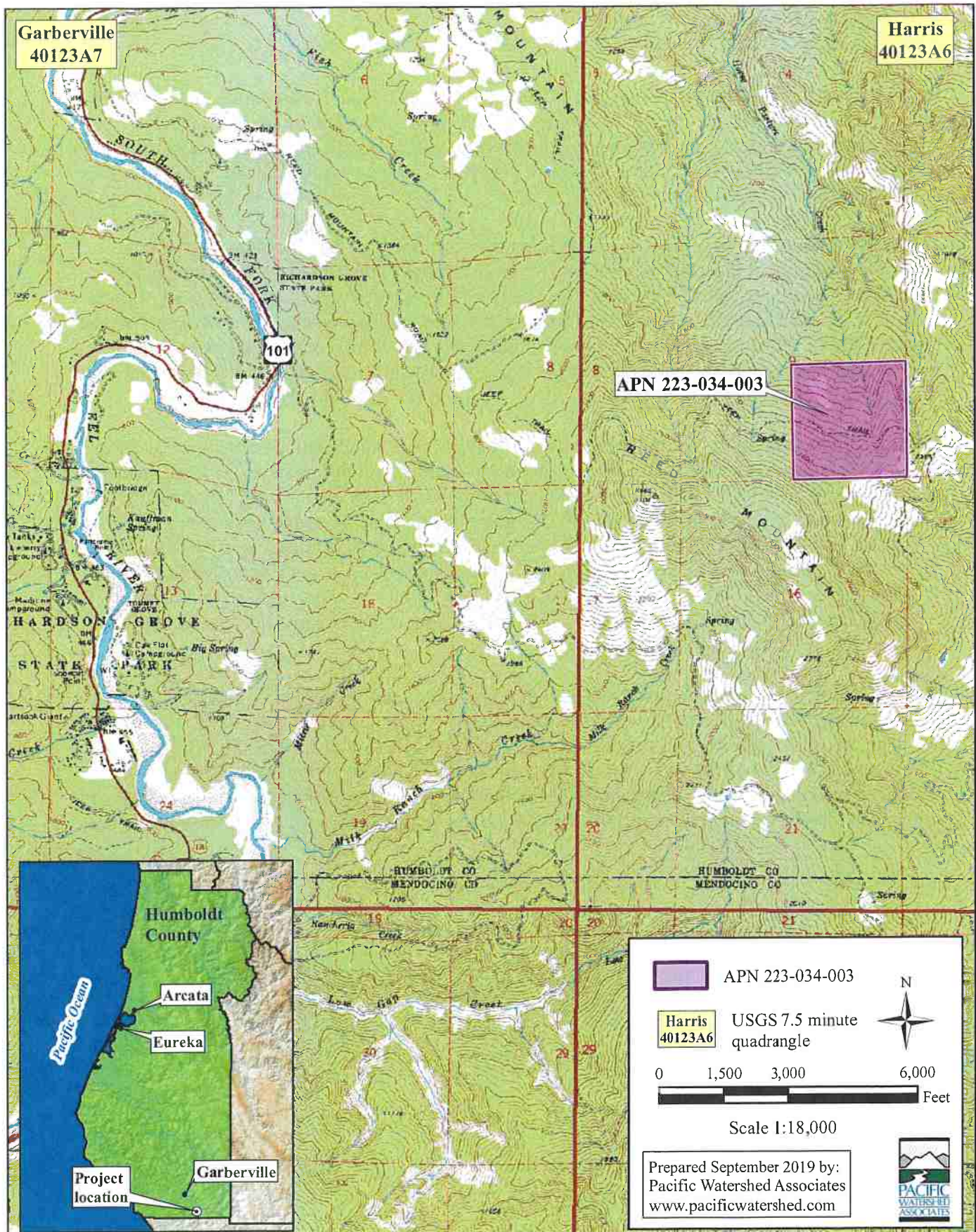


Figure 1. Location map for Site Management Plan (SMP), APN: 223-034-003, Reed Mountain, Garberville, Humboldt County, California.



## 1 **SEDIMENT DISCHARGE BPTC MEASURES**

### 1.1 Site Characteristics

#### 1.1.1 Site Map

See the attached site map, Figure 2, showing access roads, vehicle parking areas, streams, stream crossings, cultivation site(s), disturbed areas, buildings, trash/refuse storage locations, onsite wastewater treatment system(s), and storage locations for: fertilizers, pesticides, herbicides, and rodenticides.

#### 1.1.2 Access, Maintenance, and Storm Water

Project Site information regarding site maintenance, erosion control, and drainage features is contained in the WRPP. Please refer to **Section 4.1 Standard Condition #1 – Site Maintenance, Erosion Control and Drainage Features** of the Project Site WRPP.

#### 1.1.3 Stream Crossings

Project Site information regarding stream crossing conditions are contained in the WRPP. Please refer to **Section 4.2 Standard Condition #2 – Stream Crossing Maintenance** of the Project Site WRPP.

##### 1.1.3.1 Legacy Waste Discharge Issues for Region 1

Project Site information regarding legacy stream crossing conditions are contained in the WRPP. Please refer to **Section 4.2 Standard Condition #2 – Stream Crossing Maintenance** of the Project Site WRPP.

### 1.2 Sediment Erosion Prevention and Sediment Capture

The Discharger and Project Site are enrolled in the General Order as Low Risk Tier 2, and are not required to submit a Site Erosion and Sediment Control Plan.

#### 1.2.1 Erosion Prevention and Sediment Control Measures: BPTC Description, Schedule, and Map

Refer to Figure 2 for the location of erosion prevention and sediment control BPTC measures that will be implemented. A revised implementation schedule for BPTC measures is provided in Section III of this SMP.

#### 1.2.2 Maintenance Activities – Erosion Prevention and Sediment Control

All ditch relief culverts and road drainage infrastructure will be maintained as functional by the Discharger to limit hydrologic connectivity to watercourses and reduce the likelihood of culvert failure from plugging. Ditch relief culverts will be inspected by the Discharger prior to significant rainfall during the fall season and after significant winter storms.

#### 1.2.3 Erosion Control BPTC Measures – Interim and Long-term

Interim soil stabilization measures include limiting disturbance to native soil areas in the vicinity of the project area. Any additional soil disturbance not

already included will be described in an amendment to the Site Management Plan and will be addressed by interim soil stabilization measures.

Long-term soil stabilization measures include:

- Cover crops and mulch will be placed onto idle soil beds prior to the start of the rainy season. For any additional measures please refer to **Section 4.1 Standard Condition #1 – Site Maintenance, Erosion Control and Drainage Features** of the Project Site WRPP.

## **2 FERTILIZER, PESTICIDE, HERBICIDE, AND RODENTICIDE BPTC MEASURES**

### **2.1 Summary Table**

Project Site information regarding fertilizer, pesticide, and herbicide use is contained in the WRPP. Please refer to **Section 4.7 Standard Condition #7. Fertilizers and Soil Amendments; Section 4.8 Standard Condition #8 Pesticides/Herbicides; and Section 8. List of Chemicals** of the Project Site WRPP. Figure 2 identifies the location of fertilizer and pesticide use (Cultivation Areas) and storage locations.

### **2.2 Bulk Fertilizers and Chemical Concentrates**

Bulk fertilizers are stored in the bar/garage (Figure 2) on the Project Site.

### **2.3 Spill Prevention and Cleanup**

The likelihood of chemical spills will be minimized by storing all fertilizers, pesticides, and herbicides off of the ground and in designated enclosed containers and structures. Spill cleanup will be initiated as quickly as possible after occurrence. In the event of spills on pavement or concrete, solid materials will be removed utilizing a broom/brush and pan or vacuum. Affected paved surfaces will be decontaminated using a mild detergent and water. Liquid chemical spills on pavement or concrete will be captured using absorbent materials. Spills of solid or liquid materials on soil will be cleaned by removal of the spilled materials and contaminated soil using a shovel and/or absorbent materials. Contaminated soil will be stored in a labelled sealed container. Disposal of contaminated materials will be conducted in accordance with manufacturer's instructions and local regulations.

## **3 PETROLEUM PRODUCT BPTC MEASURES**

### **3.1 Summary Table**

Information regarding petroleum products on the Project Site is contained in the WRPP. Please refer to **Section 4.9 Standard Condition #9. Petroleum Products and other Chemicals** of the Project Site WRPP. Figure 2 identifies the location of petroleum product use and storage locations (barn/garage and generator shed).

### **3.2 Handling**

LPG and diesel is transported to the Project Site and transferred to storage tanks by a licensed purveyor. In addition, small, portable gasoline containers are filled up offsite and transferred onsite in vehicles.



3.3 Spill Prevention and Cleanup

Please refer to **Section 4.9 Standard Condition #9. Petroleum Products and other Chemicals** of the Project Site WRPP and in this document in **Section 2.3 Spill Prevention and Cleanup**.

4 **TRASH/REFUSE, AND DOMESTIC WASTEWATER BPTC MEASURES**

4.1 Types, containment, and disposal of trash/refuse

Cultivation related wastes include organic wastes (cannabis stems, leaves, roots, etc.), plastic pots and planting materials, plastic containers, and degraded plastic tarps.

Information regarding trash and refuse on the Project Site is contained in the WRPP. Please refer to **Section 4.10 Standard Condition #10. Cultivation-Related Wastes** of the Project Site WRPP.

4.2 Domestic wastewater disposal

Information regarding domestic wastewater on the Project Site is contained in the WRPP. Please refer to **Section 4.11 Standard Condition #11. Refuse and Human Waste** of the Project Site WRPP.

5 **WINTERIZATION BPTC MEASURES**

5.1 Winterization Activities

Information regarding winterization of the Project Site is contained in the WRPP. Please refer to **Section 4.3 Standard Condition 3, General Comments and Recommendations**, and **Section 4.7 Standard Condition #7. Fertilizers and Soil Amendments** of the Project Site WRPP.

5.2 Maintenance of Drainage or Sediment Capture Features

Ditch relief culverts and general road drainage will be inspected by the Discharger prior to significant rainfall during the fall season and after significant winter storms. Any debris found to plug or partially plug a culvert inlet on the Project Site will be removed. Any concentrated road and/or site drainage sediment delivery problems will be repaired and/or maintained immediately upon identification.

5.3 Revegetation Activities

No land disturbance activities requiring winter revegetation are planned or anticipated.

5.4 BPTC Measure Schedule

See Table 1 below.

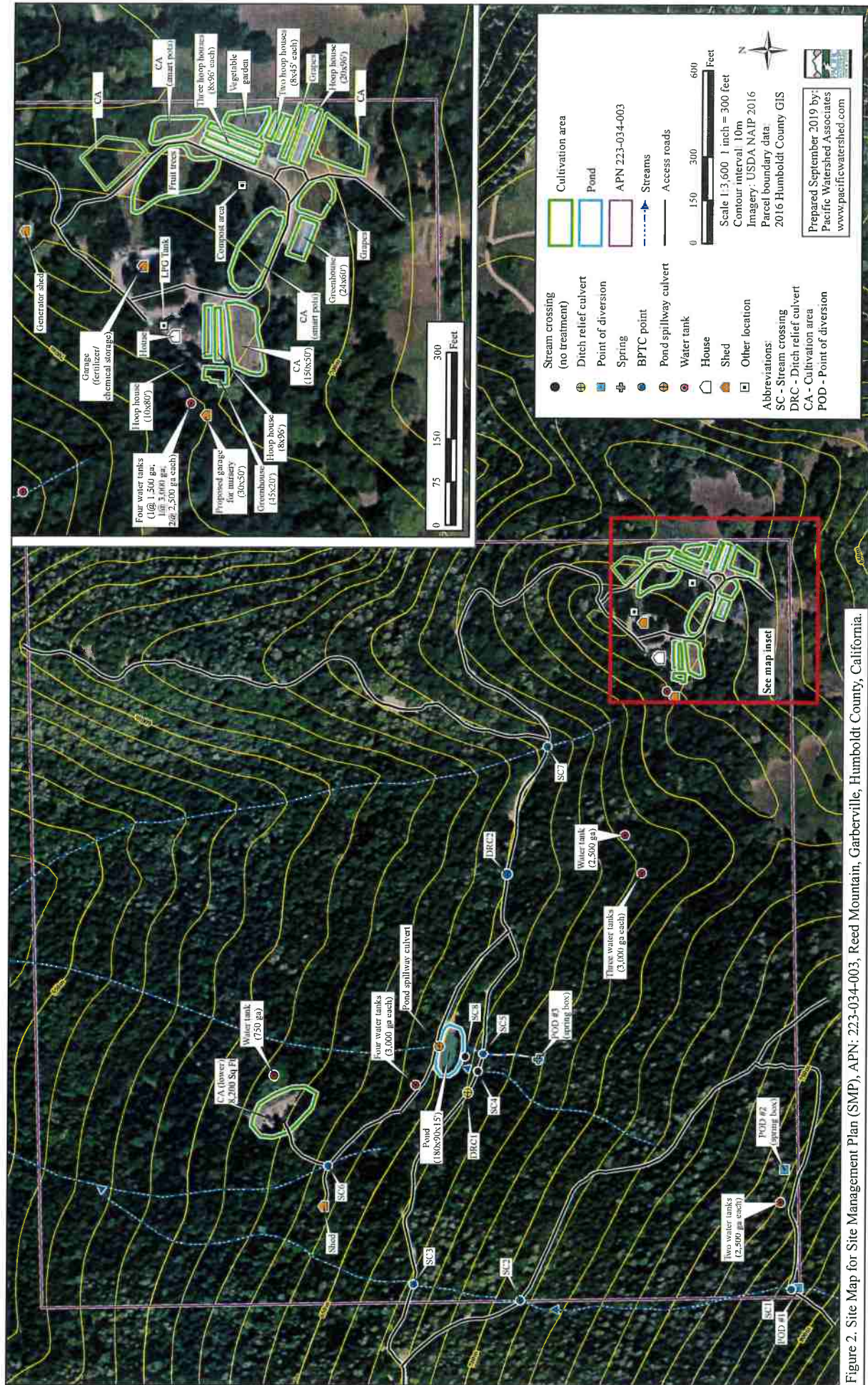
5.5 Legacy Discharge Activities

No legacy discharge activities requiring winter revegetation or erosion control are located on the project site.

### III. REVISED SCHEDULE FOR BPTC IMPLEMENTATION

Table 1. Revised prioritized implementation schedule for Best Practicable Treatment or Controls (BPTCs)				
NCRWQCB Order Standard Condition Requiring Action	Treatment Priority	Schedule	Summary of Corrective Actions/Recommendations (see more detailed listing of corrective actions in Appendix A - WRPP)	
4.1 – Site Maintenance, Erosion Control and Drainage Features	Low	October 31, 2021	1) Install road drainage improvements to hydrologically disconnect roads from streams (DRC #2 replacement). Work is to be completed when scheduled stream crossing work is implemented.	
4.2 – Stream Crossing Maintenance	Moderate	October 31, 2021	1) Upgrade undersized stream crossings with culverts designed to convey the 100-year discharge and debris in transport as described in <b>WRPP Section 4.2: Standard Condition #2 Site specific comments and recommendations</b> . Stream crossings should be designed and installed according to the standards set forth in <i>The Handbook for Forest, Ranch and Rural Roads</i> (PWA 2015). 2) Install critical dips at stream crossing with diversion potential. * All stream crossing work must be designed and implemented with all required permits which may include but may not necessarily be limited to: CDFW 1602 LSAA, ACOE 404, SWRCB 401, Humboldt County Building/Grading Permit, etc.	
4.7 - Fertilizer and Amendment Use	Moderate	Ongoing annually	1) Document fertilizer and amendment use on log sheets provided in Appendix E of the WRPP. 2) Plant cover crops in planting pots, holes and beds at the end of the season to help build soil health and prevent leaching of nutrients out of the cultivation area. If plant stalks are disposed of by burning, mix the ash into the pots prior to planting the cover crop to enrich the spent soil with minerals.	
4.8 – Pesticides and Herbicide	Moderate	Ongoing annually	1) Document pesticide, herbicide, and fungicide use on log sheets provided in Appendix F.	
4.9 – Petroleum Products and Other Chemicals	Moderate	Ongoing annually	1) Store all petroleum products under cover and in a secondary containment basin (tote, tub, etc.). 2) Acquire/maintain spill prevention supplies and place where easily accessible in case of accidental spill.	
4.11 – Refuse and Human Waste	Moderate	December 31, 2020	If current OWTS is not permitted by the County, design and construct a County approved OWTS. In the interim, regularly service portable toilets as necessary.	







#### IV. DISCHARGER CERTIFICATION/SIGNATURES

This Site Management Plan (SMP) has been prepared by Pacific Watershed Associates, on behalf of the Discharger.

“I have read and understand this Site Management Plan, including Section II – Certifications, Conditions and Limitations, and the associated attachments. I agree to comply with the requirements of the State Water Resources Control Board (SWRCB) Cannabis Cultivation Policy Order WQ 2019-0001-DWQ, General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (General Order)., including the recommendations and actions listed in this Site Management Plan.”

Name of Legally Responsible Person (LRP): \_\_\_\_\_

Title (owner, lessee, operator, etc.): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Site Management Plan prepared by (if different from LRP): **Pacific Watershed Associates, Inc.**

Site Management Plan prepared and finalized on (date): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_