



## Site Management Plan (Tier 1, Low Risk)

WDID- 1\_12CC403794

**Humboldt County** APN: 522-044-039-000

Prepared by:



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#### Purpose

This Site Management Plan (SMP) has been prepared on behalf of the cannabis cultivator for the Humboldt County property identified as assessor parcel numbers 522-044-039-000, by agreement and in response to the State Water Resources Control Board Cannabis Cultivation Policy (Cannabis Policy), in congruence with Order WQ 2017-0023-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 covered under the General Order are subject to the requirements of the Cannabis Policy in its entirety. The Cannabis Policy provides a statewide tiered approach for permitting discharges and threatened discharges of waste from cannabis cultivation and associated activities, establishes a personal use exemption standard, and provides conditional exemption criteria for activities with a low threat to water quality.

#### **Tier Designation**

Tiers are defined by the amount of disturbed area. 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 for Tier 1 and Tier 2 enrollees under the Cannabis Policy is based on the slope of disturbed areas and the proximity to a surface water body. Characterization is based on the risk designation summarized in Table 1 below.

Low Risk Moderate Risk High Risk No portion of the Any portion of the Any portion of the disturbed area is located disturbed area is located disturbed area is on a slope greater than on a slope greater than located within the 30 percent, and 30 percent, and setback requirements. All of the disturbed area All of the disturbed area complies with the complies with the setback requirements. setback requirements.

Table 1: Summary of Risk Designation

Thorough assessment of the project area including roads, disturbed areas, legacy features, and cultivation areas classify this enrollment into the **Tier 1, Low Risk** designation.

#### Scope of Report

Tier 1 and Tier 2 cannabis cultivators are required to submit and implement a Site Management Plan that describes how they are complying with the Requirements listed in Attachment A. The description shall describe how all applicable Best Practicable Treatment or Control (BPTC) measures are implemented. Cannabis cultivators within the North Coast Regional Water Quality Control Board jurisdiction are required to submit and implement Site Management Plans that describe how the Requirements are implemented property-wide, to include legacy activities. The SMP includes an Implementation Schedule to achieve compliance, but all work must be completed by the onset of the Winter Period each year. Projects designated as Moderate Risk are also required to have a Site Erosion and Sediment Control (plan) to achieve the goal of minimizing the discharge of sediment off-site. Projects designated as High Risk are also required to have a Disturbed Area Stabilization Plan to achieve the goal of stabilizing the disturbed area to minimize the discharge of sediment off-site and comply with the setback requirements. The Discharger shall ensure that all site operating personnel are familiar with the contents of the General Order and all technical reports prepared for the property. Projects which have over one acre of cannabis cultivation (total canopy area) are also required to have a Nitrogen Management Plan to describe how nitrogen is stored, used, and applied to crops in a way that is protective of water quality. A copy of the General Order, and technical reports required by the General Order, shall be kept at the cultivation site. Electronic copies of these documents are acceptable. Either format of maintained documents kept on site must be immediately presentable upon request.

#### Methods

The methods used to develop this SMP include both field and office components. The office component consisted of aerial photography review and interpretation, existing USGS quad map review, GIS mapping of field data, review of on-site photography points, streamflow calculations, general planning, and information gathered from the cannabis cultivator and/or landowner. The field component included mapping of all access roads, vehicle parking areas, Waters of the State, stream crossings, drainage features, cultivation sites, buildings, disturbed areas, and all other relevant site features within the project are and surrounding areas (as feasible). Cultivation areas, associated facilities, roads, and other developed and/or disturbed areas were assessed for discharges and related controllable water quality factors from the activities listed in the General Order. The field assessment also included an evaluation and determination of compliance with all applicable BPTC's per Section 2 of the General Order.

#### **Property Description**

The property assessed is a single, 56-acre parcel located approximately 2.7 miles west of Willow Creek, California. The elevation of the property ranges from approximately 1,440 - 2,240' above mean sea level. The property is located in the northeast ¼ of Section 35, and the northwest ¼ of Section 36, T7N, R4E, HDBM, Humboldt County, of the Willow Creek USGS 7.5' Quad. An unnamed Class III stream flows southwest - northeast through the property, which is tributary to Brannan Creek, tributary to Willow Creek, tributary to the Trinity River, tributary to the Klamath River, which terminates in the Pacific Ocean. There is approximately 21,237 ft² of disturbed area on the property. The maximum slope of the disturbed area is 28%, and no portion of the cultivation

area encroaches within the setbacks of surface waters. This property is classified as Tier 1 and Low Risk designation.

#### **Project Description**

Cannabis cultivation on the property consists of six cultivation areas which include hoop houses of varying dimensions, as well as outdoor cultivation sites. The total cultivation area located on this property is 7,210 ft². There are also an additional three proposed cultivation sites, identified as Cultivation Areas G, H, & I. These sites are currently not physically in place; however, their locations have been mapped, and their areas listed below for reference purposes. The existing cultivation areas are located within 21,755 ft² of disturbed area. The cultivation areas are also located greater than 200' from all surface waters, which is in compliance with all required riparian setbacks. This project is permitted by Humboldt County to cultivate 7,210 ft² of cannabis canopy.

Table 1: Cultivation Site Parameters.

Cultivation Site	Land Disturbance Area (ft²)	Total Cannabis Canopy (ft²)	Adjoining Hillslopes (% Grade)
А	2,338	885	25
В	1,763	405	22
С	17,654	1,304	24
D	Included above	672	24
E	Included above	200	22
F	Included above	3,744	22
G (Proposed)	X	210	22
H (Proposed)	Х	174	22
l (Proposed)	X	1,053	24
Total:	21,755	7,210 (Existing) 1,437 (Proposed)	

Land disturbance listed in the above table signifies only current, existing disturbances. Future development of the land for implementing Cultivation Areas G, H, & I, which will disturb an area greater than that listed above, will be recalculated and added to the table upon completion.

Table 2: Project Permitting

Additional Required Permits Related to Project, Type, and Status						
SIUR	Small Irrigation and Use Registration- Not Required					
SDUR	Small Domestic Use Registration- Not Required					
LSA-1600	Final Agreement from CDFW - Notification No. 1600-2016-0228-R1					

WIND S. ERSENTATION

## Baseline Assessment of Requirements Related to Water Diversions and Waste Discharge for Cannabis Cultivation

This project was previously enrolled in the North Coast Regional Water Quality Control Board Order No. R1-2015-0023. A Water Resource Protection Plan (WRPP) was prepared by Timberland Resource Consultants. Some mitigations prescribed in the WRPP have since been completed. A re-assessment of the project was conducted and will be used as the baseline assessment for the preparation of this document.

## Land Development and Maintenance, Erosion Control, and Drainage Features Project Compliance Y⊠/N□

Roads are being classified as "permanent" (roads appurtenant to the project being used year-round), "seasonal" (roads appurtenant to the project being used primarily during summer months), "legacy" (roads not appurtenant to the project receiving little to no use), and "trail" (being rarely used for occasional access to features on the property).

The permanent use road on the property allows access to the generator and fuel storage tank, fertilizer and soil amendment storage, the residence and travel trailer, as well as the cultivation areas, and the bulk of the water storage tanks. Roads within the project area appear to have a moderate to high native rock component and, based on observations of surface erosion relative to current surface drainage break frequency, are being classified as having low erodibility. This classification will be utilized to determine surface/ditch-line drainage break frequency based on Table 19 of the Handbook for Forest Ranch and Rural Roads, 2014.

TABLE 19. Recommended maximum rolling dip and ditch relief culvert spacing, in feet, based on road gradient and soil erodibility 1,2

Soil erodibility	Road gradient (%) and drainage structure spacing (feet)					
Soli crodibility	0-3	4.6	7-9	10-12	>12	
High to moderate	250	160	130	115	100	
Low	400	300	250	200	160	

Currently, all roads on the property have native surfaces. Roads being classified as permanent shall be appropriately surfaced (crushed rock, lignin treatments, pavement, or chip-seal) to increase durability during winter use. *Updated 09/19: No roads on the property are used during the winter.* Rock is not required.

During assessment of the project area, the majority of the road drainage features were found to be lacking maintenance, but in fair condition. Many of the roads are outsloped, and utilize drainage features such as type-1 and type-2 rolling dips, and waterbars to provide road surface drainage. However, during assessment it was noted that vehicle use was wearing wheel tracks into a number of road surfaces. These wheel tracks confine road surface runoff, and make outsloping ineffective. While outsloping is an effective measure to drain road surfaces, it also requires regular maintenance via grading to maintain surface drainage functionality. There was a total of 19 existing drainage



features observed at the time of the site visit, and an additional 7 drainage features that are being prescribed to ensure adequate road surface drainage. See the Mitigation Reports and Site Map to follow for site specific details and treatment schedules. *Update 09/19: All prescribed road surface drainage features were recently installed. Post construction inspection of new features noted that all new features were designed and installed properly.* 

No erosion was observed within or adjacent to the cultivation area.

No unstable areas were observed.

### Cleanup, Restoration, and Mitigation:

Project Compliance Y⊠/N□

No areas on the property were observed which called for cleanup, restoration, or mitigation measures.

#### Stream Crossing Installation and Maintenance:

Project Compliance Y⊠/N□

Seven watercourse crossings were identified during the assessment of the property. Sites 01 - 06 identify six of the watercourse crossings located on the property that were previously detailed in the WRPP. Observed conditions and prescribed treatments of these sites were also previously covered in an existing Lake and Streambed Alteration (LSA) agreement with California Department of Fish and Wildlife, under notification number 1600-2016-0228-R1. Since the submittal of the WRPP and LSA, proposed work at all six (Sites 01-06) crossings was implemented and are now functioning adequately, with no actions proposed for these sites. The seventh watercourse crossing identified as Site 08 is a dirt ford located on a legacy road, and is functioning adequately with no signs of erosion or delivery.

#### Soil Disposal and Spoils Management:

Project Compliance Y⊠/N□

Currently, no spoils are present on the property. Any/all future spoils generated through development or maintenance of roads, driveways, earthen fill pads, or other cleared or filled areas have not been sidecast in any location where they can enter or be transported to surface waters. Any/all future spoils generated as a result of any future construction projects that are to be stored on the property shall be done so in accordance with the BTPC.

#### Riparian and Wetland Protection and Management:

Project Compliance Y⊠/N□

No disturbed areas were identified as being within the riparian setbacks.



Table 4: Riparian and Wetland Protection and Management

Oultivation	Distance [ft] to Watercourse								
Area	Class I [Setback: 100']	Class II [Setback 100']	Class III [Setback: 50']	Spring [Setback: 100']					
Α			400	405					
В			550	560					
С			670	675					
D			660	670					
E			665	680					
F			705	720					

<sup>&</sup>lt;sup>1</sup>This enrollment was previously enrolled in RWQCB Order #R1-2015-0023 and as such may retain reduced setbacks that were applicable under the previous Order.

#### Water Storage and Use:

Project Compliance Y⊠/N□

All water on the property is sourced from a rainwater catchment system, and a permitted spring (Class II) point of diversion (POD) located on the property. This POD is also covered under the existing LSA (No. 1600-2016-0228-R1). The rainwater catchment system is located on the storage structure just north of Cultivation Area A. At present, there are no metering devices in place to record water usage associated with the irrigation of cannabis. A metering device shall be installed to meter all water used for the irrigation of cannabis. Monthly water usage shall be recorded for annual reporting purposes. During the assessment of the property, a number of water storage tanks were observed to not have lids in place to completely seal them off. This is an issue due to the possibility of wildlife access and possible entrapment. The Cultivator shall acquire properly fitted sealing lids as soon as possible. Update 09/19: Non-jurisdictional rainwater used for cannabis is recorded daily by "pump and fill" technique. All lids are now properly in place and remain there unless access is needed.

Water is stored in three 5,000-gallon tanks, eight 2,500-gallon tanks, three 500-gallon tanks, two 375-gallon IBC tanks, and one 250-gallon tank. Multiple tanks were found to have lids not in place or appropriately closed to prevent the access of wildlife. Tanks shall be kept closed when not needing access, and tanks shall be retrofitted to allow use with lids properly closed. *Update 09/19: All lids are now properly in place and remain there unless access is needed.* 



At this time, the Cultivator has 37,500 gallons of water storage installed. This volume of storage is insufficient to allow for full forbearance during the required period. The Cultivator does have a proposed off-stream rainwater catchment pond which has yet to be built. The water storage capacity of the pond will be approximately 200,000-gallons. Based on the current water storage in relation to water usage rates, the Cultivator will have adequate water storage capacity to get through the Forbearance Period after the pond is constructed. Water metering device(s) shall be installed in 2019 to meter water used for the irrigation of cannabis, as well as domestic use. Recorded water use data shall be used to determine remaining storage needs to meet full forbearance. Any additional storage needed to meet water needs during the Forbearance Period shall be installed and filled prior to the Forbearance Period for 2019. Update 09/19: Non-jurisdictional rainwater used for cannabis is recorded daily by "pump and fill" technique. The cultivator intends to purchase legally delivered water until additional storage is acquired.

Currently, water usage for the 7,210 ft² of established cultivation area are unknown. Until water meters are put in place, an objective measurement of total water volume required for the irrigation of cannabis on this property is unobtainable. Below is a table pulled directly from the 2017 App C Monitoring and Reporting document which shows the water usage rate for the same property, but based on a smaller cultivation area. If we project future water needs based on the past water use relative to irrigated area, the estimated water needs to irrigate the 7,210 ft² of existing cultivation area is approximately 156,000 gallons a year. Update 09/19: Non-jurisdictional rainwater used for cannabis is recorded daily by "pump and fill" technique.

8Water Use Total surface water diversion (6gallons) Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec 0 0 4,950 14,136 14,136 7,068 9,895 0 0 Water input to storage (<sup>6</sup>gallons) Input Feb Mar Jan Apr May Jul Jun Aug Sep Oct Nov Dec Source Rain 12,500 12,500 0 0 0 0 0 0 0 0 Q 0 Surface 0 0 0 Ü 0 0 0 0 0 Water use (<sup>6</sup>gallons) 9Application Feb Mar Jan Apr Jul Oct May Jun Aug Sep Nov Dec Source Tank(s) 0 Ō 0 0 0 0 14,136 10,864 0 0 0 0 7,068 Surface 0 Ø 0 0 4,950 3,272 9,895 Ō 0 0

Table 5: Estimated Annual Water Use

Under the existing LSA, the Cultivator is allowed to divert no more than 150 gallons of water per day for domestic use during the diversion minimization period. The Cultivator has also agreed to



divert no more than 15% of the total flow at any given time in order to provide aquatic species adequate habitat and conditions for essential functions.

There is domestic water use at this time on the property. Water meter(s) and water supply infrastructure shall be designed/installed in a manner such that water usage for the irrigation of cannabis can be recorded separately from water used for domestic purposes. Additionally, if there are multiple diversions of surface water, infrastructure/metering device(s) shall be designed/installed in a manner that each source of surface water is recorded separately.

During multiple visits to the property, no irrigation runoff, or evidence of such runoff, was observed at any of the six cultivation sites.

#### Fertilizers, Pesticides, and Petroleum Products:

Project Compliance Y⊠/N□

Fertilizers, potting soils, compost, and other soils and soil amendments are currently stored in the structure on the property which is 10' north of Cultivation Area A. The products are stored in a manner in which they will not enter or be transported into surface waters, and so that nutrients or other pollutants will not be leached into groundwater. Fertilizers and soil amendments are applied and used per the manufacturers guidelines. Cultivation areas are currently maintained so as to prevent nutrients from leaving the site during the growing season and post-harvest.

The use of pesticides on the property is consistent with the manufacturer's guidelines, and is completed only by licensed personnel.

Due to the lack of power grid connection, a generator and subsequent fuel storage tank are located on the property, and identified as Site 16 & 17. The generator at Site 16 is located in a covered structure which lacks complete side wind protection, and any form of secondary containment. The fuel storage tank is currently holding propane, so top cover, side wind protection, and secondary containment are not necessary. *Update 09/19: A purpose built containment pan was has been installed under the generator. The generator is propane powered and the containment pan is more than sufficient to capture the entire volume of motor oil in the generator that could be discharged. The Cultivator has the generator professionally serviced on site.* 

Dischargers shall ensure that diked areas are sufficiently impervious to contain discharged chemicals. Discharger(s) shall implement spill prevention, control, and countermeasures (SPCC) and have appropriate cleanup materials available onsite if the volume of a fuel container is greater than 1,320 gallons. Underground storage tanks 110 gallons and larger shall be registered with the appropriate County department and comply with state and local requirements for leak detection, spill overflow, corrosion protection, and insurance coverage. On site storage of petroleum products, or other fuels used for commercial activities may require registration as hazardous materials through the California Environmental Reporting System (CERS). Additionally, any waste oil generated from commercial activities (generators) is considered by the state hazardous waste and



requires addition reporting. This discharger is advised to contact local agencies to find out if such reporting is applicable to currently operations.

#### Cultivation-Related Wastes:

Project Compliance Y⊠/N□

No cultivation-related wastes, including, but not limited to, empty soil/soil amendment/ fertilizer/pesticide bags and containers, empty plant pots or containers, dead or harvested plant waste, and spent growth medium, are stored at locations where they can enter or be blown into surface waters, or in a manner that could result in residues and pollutants within such materials to migrate or leach into surface water or groundwaters.

#### Refuse and Domestic Waste:

Project Compliance Y⊠/N□

Garbage and refuse are removed from the property as it is produced and hauled to Hoopa Valley landfill transfer station.

Domestic waste is managed by a single portable toilet on the property, identified as Site 18. It is the discharger's responsibility to ensure compliance of such action with the Humboldt County Department of Environmental Health and Human Services.

#### Annual Winterization Measures

Winterization measures consist of general cleanup and winter-preparation activities that both prepare for, and utilize, anticipated, local winter weather. In project areas that may become inaccessible during periods, or the entirety, of the winter, additional winterization procedures and precautions may be required due to the potential absence of winter monitoring.

- Any/all areas of exposed soils in and around cultivation areas shall be seeded and straw mulched.
- All existing culvert inlets shall be cleared of any existing or potential obstructions to include debris upstream of the culvert such as sediment, loose moveable rocks, and raftable small woody debris.
- All fertilizers and petroleum products will be completely sealed and placed in the Storage Structures.
- Water storage tank lids shall be appropriately closed to prevent the access of wildlife.
- All refuse/trash shall be removed and disposed of appropriately.
- All inorganic material capable of being transported by wind or rain shall be secured and stored appropriately.
- Any exposed soils resulting from winterization activities shall be seeded and straw mulched

#### STATEMENT OF CONTINGENT AND LIMITING CONDITIONS CONCERNING THE PREPARATION AND USE OF REPORTS ADDRESSING GENERAL WASTE DISCHARGE REQUIREMENTS UNDER ORDER WQ 2017-0023-DWQ

#### **Prepared by Timberland Resource Consultants**

- 1. This document has been prepared for the property within APN 522-044-039, in Humboldt County, for enrollment in the General Waste Discharge Order WQ 2017-0023-DWQ.
- 2. Timberland Resource Consultants does not assume any liability for the use or misuse of the information in this document.
- 3. The information is based upon conditions apparent to Timberland Resource Consultants at the time inspection(s) were conducted. Changes due to land use activities or environmental factors occurring after inspection, have not been considered in this document.
- 4. Maps, photos, and any other graphical information presented in this report are for illustrative purposes. Their scales are approximate, and they are not to be used for locating and establishing boundary lines.
- 5. The conditions presented in this document may differ from those made by others or from changes on the property occurring after inspections were conducted. Timberland Resource Consultants does not guarantee this work against such differences.
- 6. Timberland Resource Consultants did not conduct an investigation on a legal survey of the property.
- 7. Persons using this document are advised to contact Timberland Resource Consultants prior to such use.
- 8. Timberland Resource Consultants will not discuss this document or reproduce it for anyone other than the Client for which this document was prepared without authorization from the Client.

Jessie Cahill

**Timberland Resource Consultants** 

#### Timberland Resource Consultants

## **Treatment Implementation Schedule**

Unique Point	Proposed Work Completion Date
Site 01	
Site 02	
Site 03	•
Site 04	-
Site 05	
Site 06	•
Site 07	
Site 08	•
Site 09	•
Site 10	
Site 11	
Site 12	•
Site 13	
Site 14	Prior to 10/15/19 pending the approval of any required permits
Site 15	Prior to 10/15/19
Site 16	Immediately
Site 17	
Site 18	Immediately
Site 19	Immediately
Site 20	Prior to 10/15/19 pending the approval of any required permits
Site 21	Prior to 10/15/19 pending the approval of any required permits
lite 22	Prior to 10/15/19 pending the approval of any required permits
lite 23	Prior to 10/15/19 pending the approval of any required permits
lite 24	T
ite 25	Prior to 10/15/19 pending the approval of any required permits
ite 26	
ite 27	
ite 28	
ite 29	Prior to 10/15/19 pending the approval of any required permits
	Prior to 10/15/19 pending the approval of any required permits
ite 31	Prior to 10/15/19 pending the approval of any required permits
ite 32	
ite 33	
ite 34	
ite 35	
ite 36	
te 37	
te 38	
OD I	mmediately

#### Monitoring Plan

Cannabis cultivators shall regularly inspect and maintain the condition of access roads, access road drainage features, and watercourse crossings. At a minimum, cannabis cultivators shall perform inspections prior to the onset of fall and winter precipitation and following storm events that produce at least 0.5 in/day or 1.0 inch/7 days of precipitation. See Required Monitoring tables below for site specific monitoring and reporting requirements. Cannabis cultivators are required to perform all of the following maintenance:

- · Remove any wood debris that may restrict flow in a culvert.
- Remove sediment that impacts access road or drainage feature performance.
- Place any removed sediment in a location outside the riparian setbacks and stabilize the sediment.
- Maintain records of access road and drainage feature maintenance for annual reporting.

Cannabis cultivator that are operating in areas that are, or may become, inaccessible during winter months due to extreme weather such as snow, road closures, seasonal access roads to the property, or any other such conditions shall make additional efforts to enhance winterization measures in the absence of monitoring during storm events.

#### **Monitoring Requirements**

(Tier 2, Low Risk, < 1 acre of cultivation)

Monitoring Requirement	Description
Winterization Measures Implemented	Report winterization procedures implemented, any outstanding measures, and the schedule for completion.
Tier Status Confirmation	Report any changes in the tier status.
Third Party Identification	Report any change in third party status as appropriate.

#### **Annual Reporting**

Annual Reports shall be submitted to the North Coast Regional Water Quality Control Board by March 1<sup>st</sup> following the year being monitored. The first Annual Report for this enrollment shall be submitted by March 1<sup>st</sup>, 2019 and report on monitoring done during the 2018 calendar year. Annual reporting is required each subsequent year of enrollment.





			,,		w	WDID# - 1_1	2CC40379
Unique Poin	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 10	-123.685602 40.944575	Permanent		x		•	
rocked, autslo	-	Type-2 rolling di t road. The drains lelivery.				Prescribed Action: None. The rolling dip shall be maintaged as pecifications outlined in the attached BMP's. See attack Rolling Dip Design and Placement.	
Unique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 11	-123.68534 40.94417	Permanent		х			
	d. The drainage	e feature was obs			itsloped	Prescribed Action: None. The rolling dip shall be mainta specifications outlined in the attached BMP's. See attack Rolling Dip Design and Placement.	
Unique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 12	-123.684092 40.945142	141		х			
area, then cont	inues down Int	k seep that drains o the watercours elivers to has a	e. The surround	ding area is		Prescribed Action: None.	
Unique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 13	-123.684169 40.944991	Permanent	-	х		-	
	e feature was	ype-1 rolling dip observed to be fu				Prescribed Action: None. The rolling dip shall be mainta specifications outlined in the attached BMP's. See attach Rolling Dip Design and Placement.	
Unique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 14	-123.683411 40.944755	Permanent	x	x		Prior to 10/15/19 pending the approval of any required permits	Sep-19
vith an 18% slo	pe up, and a 5° feature, and c	ion of undrained % slope down. Wa ontinuing down	ater was observ	red to be		Prescribed Action: Install a new rolling dip to prevent water traveling down the road surface, and to allow proper road drainage. See attached BMP's: Rolling Dip Design and Plantage.	surface
Jnique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 15	-123.68295 40.944525	Permanent	х	х		Prior to 10/15/19	Sep-19
	ne road surface	erence to a cutbe e. The slumped so				Prescribed Action: The slumped material shall be remover and without further disturbance to the cutbank. The cutblaid back to a 2:1 to ensure stability, and seeded and strated future fail potential. The slumped sediment shall be an area of gently sloped ground, outside of riparian setbadoes not have the potential to be transported by wind or rewards of the State. The Cultivator will spread it thinly, an straw mulch the soil to stabilize it in place.	ank shall be w mulched to e relocated to cks, where it ain into any





		-			-	WDID# - 1_	12CC40379	
Unique Poin	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed	
Site 16	-123.682765 40.944509	Permanent	X	×		immediately	Sep-19	
powered gener protection, as	rator. The shed it is open-face itainment, The	eference to the side currently has co don one side. The storage shed is lo	ver, but lacks on the same of	complete sides	de wind	Prescribed Action: The Cultivator shall retrofit the curre structure to have complete side wind protection, or acquitate has both cover, and complete side wind protection. will also acquire and install a secondary containment base, at minimum, equal to or greater than the total volume which it is stored under.	ire a new shee The Cultivator sin which will	
Unique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed	
Site 17	-123.682729 40.944466	Permanent	-	х				
		eference to a prop the required ripar		ge tank. The		Prescribed Action: None.		
Unique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed	
Site 18	-123,682783 40.944084	Permanent	-	x		lmmediately		
which holds the	tiny home, tra	ivel traller, and ki	tchen area.			is to be contained via a septic system and/or portable/che which are to be serviced as required by licensed persone of domestic wastewater storage, transportion, and dispos required to be done so in compliance with the Humboldt Department of Environmental Health and Human Services	II. All aspects sal are County	
Jnique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed	
Site 19	-123.682916 40.943886	•	х	x		Immediately		
roximity to the	tiny home and	r surface dischary I travel trailer on t ding the surround	he property. Th	e discharg	ed	Prescribed Action: Pursuant with Humboldt County Dep Health and Human Services, greywater must be discharge minimum, 6" below the earth's surface, preferably in a sm containg drain rock. This ensures that the pipe does not the discharged water has adequate time to disperse into t	ed, at all pit back up, and	
nique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed	
Site 20	-123.682687 40.944023	Seasonal	х	x		Prior to 10/15/19 pending the approval of any required permits	Sep-19	
rrent Condition: Existing Type-2 rolling dip on a steep section of seasonal cess road that drains the cultivation and residence flats above. The feature is observed to be lacking adequate definition to prevent flow bypass.						Prescribed Action: Install new type-1 rolling dip, with a significant positive face to prevent overtopping, and allow proper drainage of both the cultivation and residence flats, and the road surface. See attached BMP's: Rolling Dip Design and Placement.		





Unique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment P <del>riority</del>	Date Complete
Site 21	-123.682429 40.943957	Seasonal	х	x		Prior to 10/15/19 pending the approval of any required permits	Sep-19
oad with a sig o be overtopp	nificant rocked ing the feature	type-1 rolling dig d component, and and running dov orther down grade	d a 23% slope. V	Nater was o	bserved	Prescribed Action: Redefine the type-1 rolling dip to have positive aspect face, and to prevent road surface runoff steep section of road. See attached BMP's: Rolling Dip D Placement.	down this
Jnique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Complete
Site 22	-123.681077 40.944182	Seasonal	х	x		Prior to 10/15/19 pending the approval of any required permits	Sep-19
Vater was obse	erved overtopp	type-2 rolling dip ling the feature, v strated as it reach	vhere it continu	ed downgra	ade	Prescribed Action: Redefine the existing drainage featur proper drainage of the road surface, and prevent concent surface runoff down grade. See attached BMP's: Rolling I Placement.	rated road
Inique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 23	-123.680295 40.944298	Seasonal	x	x	-	Prior to 10/15/19 pending the approval of any required permits	Sep-19
	road with poor	natural low point drainage, and of				Prescribed Action: Install a new type-2 rolling dip to brea concentrated road surface runoff, and allow proper road of attached BMP's: Rolling Dip Design and Placement.	
nique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment P <del>riority</del>	Date Completed
Site 24	-123.683763 40.945104	Seasonal	•	×		-	
		ype-2 rolling dip, I to be functionin		alled in 201	8. The	Prescribed Action: None. The rolling dip shall be maintal specifications outlined in the attached BMP's. See attach Rolling Dip Design and Placement.	
nique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 25	-123.682921 40.945077	Seasonal	x	х		Prior to 10/15/19 pending the approval of any required permits	Sep-19
		ow point, where s Early signs of wh	_		ved at	Prescribed Action: Install either a new type-1, or type-2 r allow proper road drainage, and prevent the development ruts, which have the possibility of channeling road surfac prevent outsloping from functioning appropriately. See at Rolling Dip Design and Placement.	of deep wheele runoff and
ique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 26	-123.681055 40.944764	Seasonal	-	×		-	
		pe-2 rolling dip o ture was observe			ately.	Prescribed Action: None. The rolling dip shall be maintai specifications outlined in the attached BMP's. See attache Rolling Dip Design and Placement.	





WDID# - 1\_12CC403794

Unique Poin	Lat-Long	Road Type	Mitigation	35	4000	WDID# - 1_1	Date
Ollique Foli	NAD 83		Planned	Monitor	1600	Treatment Priority	Complete
Site 27	-123.680673 40.94477	Seasonal	- :				
Current Condi	tion: 20' cone	x box used for ca	innabis waste s	torage.		Prescribed Action: None.	
Unique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Complete
Site 28	-123.679523 40.944494	Seasonal		×	20		
Current Condit functioning add		type-2 rolling di	that was obse	rved to be		Prescribed Action: None. The rolling dip shall be mainta specifications outlined in the attached BMP's. See attach Rolling Dip Design and Placement.	lined to the ned BMP's:
Unique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 29	-123.679419 40.944464	Seasonal	х	×	•	Prior to 10/15/19 pending the approval of any required permits	Sep-19
ncreases at the	e road intersec	ated road surfaction. The road interest a good oppor	tersection is loc	ated on a n	atural,	Prescribed Action: Install a new type-2 rolling dip at this allow concentrated road surface runoff from upgrade roa properly drained off of the road, south. See attached BMF Design and Placement.	ds to be
Jnique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	
Site 30	-123.678461 40.944322	Seasonal	X	х		Prior to 10/15/19 pending the approval of any required permits	Sep-19
esulted in whee o be ineffective	el ruts being we , as water is tra	road use with so orn into the road apped within the , as opposed to t	surface. This c	auses outsl ues down th	e	Prescribed Action: Install a new type-1 rolling dip to allor redirection of water flow, and proper road surface drainag attached BMP's: Rolling Dip Design and Placement.	
Inique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 31	-123.678001 40.94429	Seasonal	х	x		Prior to 10/15/19 pending the approval of any required permits	Sep-19
urrent Condition grade. Water	on: Concentra was observed	ted road surface to be cutting into	runoff from the the road surface	road inters		Prescribed Action: Install a new type-2 rolling dip to help concentration of water, and allow proper road surface dra attached BMP's: Rolling Dip Design and Placement.	
nique Point	Lat-Long NAD 83	Road Type	Mitigation Planned	Monitor	1600	Treatment Priority	Date Completed
Site 32	-123.682077 40.945929	Seasonal	ž.	х		-	
drologic disco his feature was the watercour	nnect for the C observed to be se below. Signi	aterbar that drain class III watercou e functioning ade ificant vegetation liment deposition	rse crossing lo equately, and pr was also found	cated at Site eventing de	e 06. livery	Prescribed Action: None. The waterbar shall be maintain specifications outlined in the attached BMP's. See Waterb Construction BMP.	

#### Implementation of Applicable BPTC Measures

Assessment of applicable BPTC measures consisted of a field examination on February 6, 2019. Anywhere applicable BPTC measures are not met on the property, descriptions of the assessments and the prescribed treatments are outlined following each associated section below.

#### **Summary of BPTC Measures Compliance**

- 1. Sediment Discharge BPTC Measures Y⊠/N□
- 2. Fertilizer, Pesticide, Herbicide, and Rodenticide BPTC Measures Y⊠/N□
- 3. Petroleum Product BPTC Measures Y⊠/N□
- 4. Trash/Refuse, and Domestic Wastewater BPTC Measures Y⊠/N□
- 5. Winterization BPTC Measures Y⊠/N□

#### 1. Sediment Discharge BPTC Measures

- 1.1. Site Characteristics
  - 1.1.1. Provide a map showing access roads, vehicle parking areas, streams, stream crossings, cultivation site(s), disturbed areas, buildings, and other relevant site features.

#### See attached Site Map.

1.1.2. Describe the access road conditions including estimating vehicle traffic, road surface (e.g., paved, rocked, or bare ground), and maintenance activities. Describe how storm water is drained from the access road (e.g., crowned, out slope, armored ditch, culverts, rolling dips, etc.).

The permanent use road on the property is used to access the generator and fuel storage, fertilizer and soil amendment storage, the residence and travel trailer, as well as the cultivation areas. Currently, the permanent access road on the property has native surfaces. Roads being classified as permanent shall be appropriately surfaced (crushed rock, lignin treatments, pavement, or chip-seal) to increase durability during winter use. Road use frequency for the cultivation season is daily.

During assessment of the project area, the majority of the road drainage features were found to be lacking maintenance, but in fair condition. Many of the roads are outsloped, and utilize drainage features such as type-1 and type-2 rolling dips, and waterbars to provide road surface drainage. However, during the assessment it was noted that vehicle use was wearing wheel tracks into a number of road surfaces. These wheel tracks confine road surface runoff, and make outsloping ineffective. While outsloping is an effective measure to drain road surfaces, it also requires regular maintenance via grading to maintain surface drainage. There was a total of 19 existing drainage



features observed at the time of the site visit, and an additional 7 drainage features that have been prescribed to ensure adequate road surface drainage. See the Mitigation Reports and Site Map to follow for site specific details and treatment schedules.

Roads within the project area appear to have a moderate to high native rock component, and based on observations of surface erosion relative to current surface drainage break frequency, are being classified as having low erodibility. This classification will be utilized to determine surface/ditch-line drainage break frequency based on Table 19 of the Handbook for Forest Ranch and Rural Roads, 2014.

Update 09/19: All prescribed road surface drainage features were recently installed. Post construction inspection of new features noted that all new features were designed and installed properly.

1.1.3. Describe any vehicle stream crossing including the type of crossing (e.g., bridge, culvert, low water, etc.).

Seven watercourse crossings were identified during the assessment of the property. Six of these crossings were addressed previously in a Water Resource Protection Plan (WRPP), and thus will retain their original site numbers for cross-referencing purposes. Sites 01 - 06 identify six of the watercourse crossings located on the property that were previously detailed in the WRPP. Observed conditions and prescribed treatments of these sites were also previously covered in an existing Lake and Streambed Alteration (LSA) agreement with California Department of Fish and Wildlife, under notification number 1600-2016-0228-R1. Since the submittal of the WRPP and LSA, all six (Sites 01 – 06) crossings have undergone work and are now functioning adequately. The seventh watercourse crossing is a dirt ford located on a legacy road, and is functioning adequately with no signs of erosion or delivery.

These sites include both culverted, and rocked ford crossings. Culvert dimensions for these crossings range from 15" to 30" in diameter. All crossings are over Class III, or undefined watercourses, and were observed to be functioning adequately.

1.1.3.1. For Region 1 Dischargers, identify, discuss, and locate on the site map any legacy waste discharge issues that exist on the property.



All legacy roads on the property were observed to have a high native rock component, and adequate outsloping to allow proper drainage of the road surface. There were no legacy waste discharge issues located on the property.

- 1.2. Sediment Erosion Prevention and Sediment Capture (Moderate risk Tier 1 or Tier 2 Dischargers are required to submit a Site Erosion and Sediment Control Plan. Those Dischargers may refer to that plan rather than repeat it here)
  - 1.2.1. Erosion Prevention BPTC Measures
    - 1.2.1.1. Describe the BPTC measures that have been, or will be implemented to prevent or limit erosion. Provide an implementation schedule for BPTC measures that have not yet been implemented. Identify the erosion prevention BPTC measures on a site map.

See attached Site Map and the Mitigation Report for implementation schedule.

1.2.1.1.1 The description shall address physical BPTC measures, (e.g., placement of straw mulch, plastic covers, slope stabilization, soil binders, culvert outfall armoring, etc.) and biological BPTC measures (vegetation preservation/replacement, hydro seeding, etc.).

Existing physical BPTC measures include rock armoring at the inlet and outlet of each culverted watercourse crossing and ditch relief culverts. Prescribed physical BPTC measures include seeding and straw mulching the slumped cutbank seep located at Site 15.

Update 2019: All prescribed surface drainage features have been installed or repaired.

#### 1.2.2. Sediment Control BPTC Measures

1.2.2.1. Describe the BPTC measures that have been, or will be implemented to capture sediment that has been eroded. Provide an implementation schedule for BPTC measures that have not yet been implemented. Identify the sediment control BPTC measures on a site map.

#### See attached Mitigation Report for implementation schedule.

1.2.2.1.1. The description shall address physical BPTC measures, (e.g., placement of silt fences, fiber rolls, or settling ponds/areas, etc.) and biological BPTC measures (vegetated outfalls, hydro seeding, etc.).

No sediment capture features are present or prescribed for this property.

WOID: 1 1200403791



1.2.3. Maintenance Activities - Erosion Prevention and Sediment Control

1.2.3.1. Describe how the erosion prevention and sediment control BPTC measures will be monitored and maintained to protect water quality.

Erosion prevention and sediment control BPTC measures will be monitored and maintained in a number of ways. All culverted watercourse crossings and the ditch relief culvert will be monitored to ensure that the inlets and outlets remain free of any blockages which could restrict water flow through the pipe. Waintenance of these crossings will include hand work to remove any sediment or large debris that clogs the culvert in any way.

Road drainage features will be monitored to ensure that sediment accumulation does not occur at such an amount as to allow the feature to be overtopped, rendering it ineffective. Road drainage features will be maintained by clearing any deposited sediment with a shovel or similar tool, to allow the features to function properly and keep the roads free of surface water flows.

All seeding that is to take place will be monitored to ensure that the vegetation is taking root to bind the soil in place. These seeding locations will be maintained by continuously seeding and straw mulching until vegetation does take root.

1.2.3.2. Describe how any captured sediment will be either stabilized in place, excavated and stabilized on-site, or removed from the site.

Any sediment that is captured in road drainage features will be excavated via hand tools, and relocated to gently-sloped ground that is outside of the riparian setbacks. The soil will then be spread thinly, and seeded and straw mulched to ensure the vegetation binds the soil in place, preventing any possible transport into Waters of the State.

1.2.4. Erosion control BPTC measures: Describe the interim soil stabilization, if applicable and long-term BPTC measures implemented to prevent sediment transport at each identified disturbed area(s) and improperly constructed features.

No interim soil stabilization measures were prescribed for this property.

#### 2. Fertilizer, Pesticide, Herbicide, and Rodenticide BPTC Measures

2.1. Provide a summary table that identifies the products used at the site, when they are delivered to the site, how they are stored, and used at the site. If products are not consumed during the growing season, describe how they are removed from the site or stored to prevent discharge over the winter season.

See comprehensive table under 2.3



2.2. Provide a site map that locates storage locations.

#### See attached Site Map.

2.3. Describe how bulk fertilizers and chemical concentrates are stored, mixed, applied, and how empty containers are disposed.

#### Fertilizer, pesticides, and Herbicide Products used on Site

Product	Delivery and Storage	On-site usage	How removed or stored
Pesticides: Pest Out, Organicide, Dr. Zymes, Plant Therapy, Bacillis Subtillis, Garden Phos, Armory	Products were brought to the property by the Cultivator in February of 2018, and are stored in the structure just north of Cultivation Area A.	All fertilizers are either top-dressed and watered in, or mixed directly into feed tanks and then dripped, or hand watered.	Once the containers are emptied, the Cultivator hauls them personally to the Hoopa Valley Transfer Station for proper disposal.
Fertilizers: Feather Meal, Chicken Manure, PNG Seabird Guano (Veg), Seabird Guano (Bloom), Bat Guano, Dr. Earth: Grow, Dr. Earth: Bloom	Products were brought to the property by the Cultivator in February of 2018, and are stored in the structure just north of Cultivation Area A.	All fertilizers are either top-dressed and watered in, or mixed directly into feed tanks and then dripped, or hand watered.	Once the containers are emptied, the Cultivator hauls them personally to the Hoopa Valley Transfer Station for proper disposal.

2.4. Describe procedures for spill prevention and cleanup.

Due to the presence of pesticides and fertilizers on site, a cleanup kit is required in case of a spill. The Cultivator will acquire absorbent materials to be applied immediately following a chemical spill, and give it enough time to absorb as much of the spill as possible. Following the absorption of spilt chemicals post-application, it is to be removed and disposed of appropriately as per the manufacturer's guidelines. The cleanup kits shall be located anywhere pesticides, herbicides, fertilizers, soil amendments, petroleum products, and synthetic oils are stored or mixed.

#### 3. Petroleum Product BPTC Measures

3.1. Provide a summary table that identifies the products used at the site, when they are delivered to the site, how they are stored, and used at the site. If products are not consumed during the growing season, describe how they are removed from the site or stored to prevent discharge over the winter season.

See comprehensive table under 3.3.

3.2. Provide a site map that locates storage locations.

See attached Site Map.

3.3. Describe how fuels, lubricants, and other petroleum products are stored, mixed, applied, and empty containers are disposed.

#### Petroleum Products

Products used on site	When they are delivered to site	How they are stored and used	How removed or stored
Gasoline	Brought to site in May 2018.	Stored in standard 5- gallon gasoline canisters, separately from fertilizers in the storage structure. Used to fuel equipment such as hand tools and pumps.	The gasoline is stored in its own area away from fertilizers in the storage structure. Hand cans are refilled as needed, so no waste is created through the fueling process.
Propane	Brought to site in May of 2018, and refilled as needed.	Stored in a 500-gallon holding tank, and used to fuel the generator which runs the storage shed above Cultivation Area A.	N/A

There is one propane-powered generator, and one propane storage tank located on the property, identified as Sites 16 & 17 respectively. While the generator is located in a shed with top cover, it lacks complete side wind protection (open-face on the eastern side), and a secondary containment basin, which threatens the surrounding environment in the case of heavy rainfall, or a generator leak or failure. The Cultivator shall retrofit the structure to have complete side wind protection, or acquire a new structure that has both complete side wind protection and top cover. This is to prevent any wind-blown rain from entering the structure and making contact with any potentially spilt fluids, transporting them out of the structure where they have the ability to leach into the surrounding environment and potentially deliver to Waters of the State. The Cultivator shall also acquire and install some form of a secondary containment basin which will be placed below the generator. The secondary containment basin is required to have, at minimum, a storage volume equal to or greater than the total volume of liquid it is stored beneath.

Update 2019: A spill plan has been installed under the generator and all petroleum products are stored properly.



3.4. Describe procedures for spill prevention and cleanup.

Adequate quantities of absorbent materials are stored at all locations where these types of materials are used, stored, or mixed. Should a spill of these materials occur, absorbent materials will be applied immediately and allowed enough time to absorb as much material as possible. Following treatment, absorbent materials applied as well as any contaminated soil will be removed and disposed of appropriately for the spilled material, following the manufacturer's guidelines.

#### 4. Trash/Refuse, and Domestic Wastewater BPTC Measures

4.1. Describe the types of trash/refuse that will be generated at the site. Describe how the material is contained and properly disposed of.

Trash and refuse generated on site include organic and inorganic wastes generated from both agricultural and domestic activities. Trash is stored on the property in the storage structure just north of Cultivation Area A. The trash stored at this location is disposed of via the Cultivator, every other week, at Hoopa Valley Transfer Station.

4.1.1. Provide a site map that locates the trash/refuse storage locations.

See the storage structure 10' north of Cultivation Area A, on the attached Site Map.

4.2. Describe the number of employees, visitors, or residents at the site.

Currently, the Cultivator resides on the property full-time, but travels out of town frequently outside of the cultivation season. There are an estimated 2-10 visitors that travel to the property in any given year.

4.2.1. Describe the types of domestic wastewater generated at the site (e.g., household generated wastewater or chemical toilet).

Domestic wastewater is generated via the one residence structure located on the property. The domestic wastewater is contained in a portable toilet, which is identified as Site 18. Greywater is generated on the property via a sink from an outdoor kitchen, which is identified as Site 19.

4.2.2. Describe how the domestic wastewater is disposed.

Domestic wastewater is disposed of via All American Waste Services, or B&B, both out of Humboldt County, California.

4.2.2.1. Permitted onsite wastewater treatment system (e.g., septic tank and leach lines).

Not applicable.

4.2.2.2. Chemical toilets or holding tank. If so, provide the name of the servicing company and the frequency of service.



#### None present at time of site inspection.

4.2.2.3. Outhouse, pit privy, or similar. Use of this alternative requires approval from the Regional Water Board Executive Officer; include the approval from the Executive Officer and any conditions imposed for use of this alternative.

#### Not applicable.

4.2.2.3.1. Provide a site map that locates any domestic wastewater treatment, storage, or disposal area.

See Site 18 on the attached Site Map.

#### 5. Winterization BPTC Measures

5.1. Describe activities that will be performed to winterize the site and prevent discharges of waste. The description should address all the issues listed above.

See Annual Winterization Measures above.

5.2. Describe maintenance of all drainage or sediment capture features (e.g., drainage culverts, drainage trenches, settling ponds, etc.) to remove debris, soil blockages, and ensure adequate capacity exists.

Existing drainage structures will be repaired as feasible and necessary with hand tools during winter monitoring. Prescribed repair and maintenance will be executed in accordance with the implementation schedules assigned in the Mitigation Report. See also 1.2.3.1 above.

5.3. Describe any revegetation activities that will occur either at the beginning or end of the precipitation season.

Seeding and straw mulching will be executed in accordance with the implementation schedules assigned in the Mitigation Report. No other revegetation activities were prescribed for this property.

5.4. If any BPTC measure cannot be completed before the onset of Winter Period, contact the Regional Water Board to establish a compliance schedule.

See attached Mitigation Report for implementation schedules.

5.5. For Region 1 Dischargers, describe any activities that will be performed to address legacy waste discharge issues. Region 6 Dischargers should consult with Regional Water Board staff to confirm if any other activities in addition to BPTCs are necessary to address legacy waste discharge issues.

There were no legacy waste discharge issues observed on the property at the time of the assessment.

# Attachments

#### **Photographs**

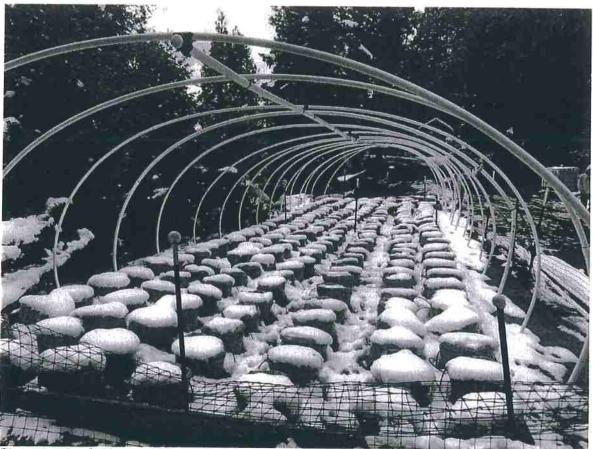


Photo showing Cultivation Area A, with travel trailer and tiny home flat in the background. Photo date 2/6/19

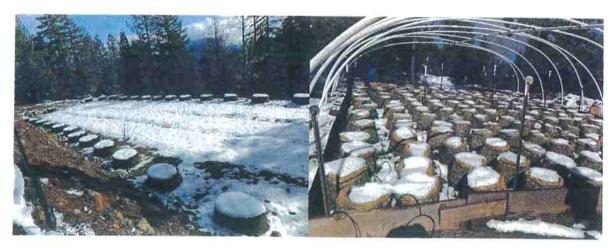


Photo showing Cultivation Area F (left) and Cultivation Area D (right). Photo date 2/6/19

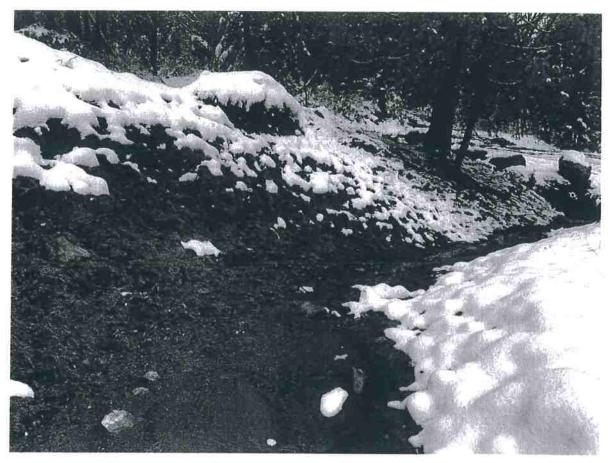


Photo showing the cutbank seep and settling area identified as Site 12 on the Site Map. Photo date 2/6/19

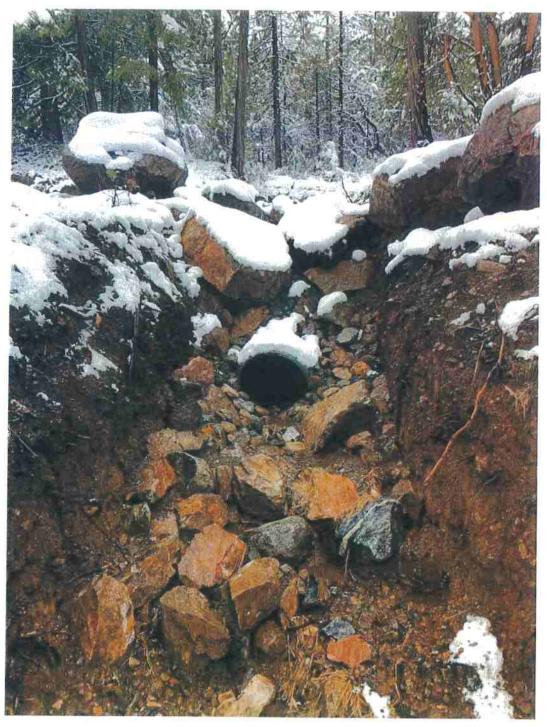


Photo showing a rock armored outlet, and energy dissipating rock at the culverted crossing identified as Site 01.
Photo date 2/6/19



Photo showing the cutbank slump next to the well, which is identified as Site 15. Photo date 2/6/19