

Site Management Plan

(Tier 1, Low Risk)

APN: 107-251-003

WDID- 1_12CC402535



Prepared by:



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TRC 390

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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 107-251-003, 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.

Table 1: Summary of Risk Designation

Low Risk	Moderate Risk	High Risk
<ul style="list-style-type: none"> No portion of the disturbed area is located on a slope greater than 30 percent, and All of the disturbed area complies with the setback requirements. 	<ul style="list-style-type: none"> Any portion of the disturbed area is located on a slope greater than 30 percent, and All of the disturbed area complies with the setback requirements. 	<ul style="list-style-type: none"> Any portion of the disturbed area is located within the setback requirements.

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 area 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 one parcel totaling 21 acres located approximately 5.1 miles south southeast of the town of Honeydew, California, at an elevation of approximately 1,800 feet above mean sea level. The property is located in Section 29, T3S, R1E, Humboldt Base and Meridian; in the Honeydew U.S. Geological Survey 7.5- minute quadrangle. The assessed property is located at the top of a ridge, within the headwaters of the Four Mile Creek Watershed. Multiple, unnamed, Class III and one Class II watercourses are located within this property. Four Mile Creek is tributary to the Mattole River. Both of the cultivation areas and the disturbed area are located outside the riparian setbacks, for these watercourses.

tank. In the future all tanks shall have attached lid appropriately closed to prevent access to wildlife. At present according to the Cultivator, there are metering devices in place to record water usage associated with the irrigation of cannabis. The cultivation size for 2019, will be cut in half as a result of county restrictions set forth to address the impaired Fourmile Creek Watershed. Water used to irrigate cannabis cultivation on this property is estimated to decrease.

Presently, the cultivator has 85,000 gallons of existing water storage. This volume of storage is sufficient to allow for full forbearance during the required period. Cannabis cultivators shall maintain daily records of all water used for irrigation of cannabis. Cannabis cultivators shall retain, for a minimum of five years, irrigation records at the cannabis site and shall make all irrigation records available for review.

Table 5: Estimated Annual Water Use

	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct	Nov
Agriculture					1,200	1,200	1,200	1,200	1,200	1,200	
SQ ft = 5,000											
YEAR 2019						Total Cannabis Water Use = 7,200 gallons					

The POD supplies domestic water. A 2,500-gallon plastic storage tank is currently used to supply water to the residence. 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 use.

A Lake and Streambed Alteration Agreement with the California Department of Fish and Wildlife, as well as an Initial Statement of Water Diversion and Use and a Small Irrigation and Use Registration with the California State Water Resource Control Board Division of Water Rights, may be required to continue use of any diversions. Any additional guidelines, treatments, or restrictions set forth under these additional permits, shall be followed.

No irrigation run off was identified during the property assessment.

Fertilizers, Pesticides, and Petroleum Products:

Project Compliance Y ☐/N ☒

At the time of the assessment, all fertilizers, potting soils, compost, and other soils and soil amendments were found to be currently stored within structures on the property. However, liquid forms of fertilizers were found stored with no secondary containment. Plastic totes with appropriately sized sealing lids are adequate forms of secondary containment for fertilizers and soil amendments.

Fertilizers and soil amendments are applied and used per the manufacturer's guidelines. No nutrients were observed leaching or migrating into state waters from the cultivation areas.

to keep seed in place and establish adequate vegetation. See the Mitigation Report, Treatment Implementation Schedule, and Site Map to follow for site specific details.

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.

Not applicable.

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 measures are needed presently, to capture eroded sediment.

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 and all corresponding work shall be inspected prior to and in conjunction with winter monitoring, as described above under the "Monitoring Plan" to ensure proper placement, installation, and function remain intact prior to and throughout the Winter Period.

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.

Not applicable.

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.

Currently, no soil stabilization measures are needed.

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
Cutting Edge Micro	Brought to site in May of 2018. Stored with no secondary containment. Any left-over products were stored in the same manor and used the following year.	Mixed into tank with water. It is then hand watered to individual plants as needed.	Stored in the 40' x 20', metal storage structure, near the residence, alongside gas and petroleum products. Empty containers are disposed of at an appropriate waste disposal facility.
Cutting Edge Bloom	Brought to site in May of 2018. Stored with no secondary containment. Any left-over products were stored in the same manor and used the following year.	Mixed into tank with water. It is then hand watered to individual plants as needed.	Stored in the 40' x 20', metal storage structure, near the residence, alongside gas and petroleum products. Empty containers are disposed of at an appropriate waste disposal facility.
Cutting Edge Grow	Brought to site in May of 2018. Stored with no secondary containment. Any left-over products were stored in the same manor and used the following year.	Mixed into tank with water. It is then hand watered to individual plants as needed.	Stored in the 40' x 20', metal storage structure, near the residence, alongside gas and petroleum products. Empty containers are disposed of at an appropriate waste disposal facility.
Tappin Roots	Brought to site in May of 2018. Stored with no secondary containment. Any left-over products were stored in the same manor and used the following year.	Mixed into tank with water. It is then hand watered to individual plants as needed.	Stored in the 40' x 20', metal storage structure, near the residence, alongside gas and petroleum products. Empty containers are disposed of at an appropriate waste disposal facility.

No portable toilets on site during the site visit.

- 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.

None present at time of site inspection.

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

See attached Site Map for location of residence.

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 Mitigation Report and Annual Winterization Measures for prescribed general winterization measures that will be performed prior to every Winter Period, and site specific interim measures that will be performed prior to the Winter Period until permanent, prescribed treatments can be executed.

- 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 annual winterization and winter monitoring. Prescribed repair and maintenance will be executed in accordance with the Mitigation Report and Treatment Implementation Schedules.

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

See attached Mitigation Report and Treatment Implementation Schedule above.

- 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 and Treatment Implementation Schedule above.

- 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

No legacy waste issues were identified with this property.

Photographs



Photo #1: Upper Cultivation Area A, with a 100' x 20' cut bank, with numerous rills. Photo Date: 2/07/2019.



*Photo #2: Abandon Cultivation Area C, just north of residence. Cultivation related materials, still present.
Photo Date: 02/07/2019.*



Photo #2: Permanent access road, with adequately rocked surface, leading up to residence.
Photo Date: 02/07/2019.

Attachments

Cultivation Area A, has monofilament netting surrounding the perimeter. A ban on all monofilament netting is now in effect. The Cultivator shall collect, secure and dispose of all such netting.

Refuse and Domestic Waste:

Project Compliance Y ☐/N ☒

The Cultivator has taken steps to collect and contain garbage generated from the project, by providing garbage cans. However, Presently, numerous garbage cans were found lacking lids, full of rain water and packed with domestic refuse. In the future, the Cultivator shall attempt to remove garbage as it is produced, and haul it away to a landfill transfer station.

Human waste is managed by a permitted septic system on site. 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, interiors, and outlets 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.
- Damage or wear resulting from vehicular use to road surfaces (such as rutting or wheel tracks) and/or road surfacing (such as rock) that would impair road surface drainage or drainage features (such as out sloping, water bars, rolling dips, etc.) shall be repaired prior to the Winter Period.
- All existing surface drainage features and sediment capture features shall be maintained if needed to ensure continued function through the Winter Period.
- All fertilizers and petroleum products will be stored in an area located outside of riparian setbacks, completely sealed, placed in a secondary containment (liquids), and stored in a manner that prevents contact with precipitation and surface runoff.
- Chemical toilets will be removed from the property until need resumes the following cultivation season, or at a minimum serviced and left unused during periods when not in use.
- 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 107-251-003, 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.

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Treatment Implementation Schedule

Unique Point	Proposed Work Completion Date
Site 01	Immediately
Site 02	Annually prior to 10/15
Site 03	Annually prior to 10/15
Site 04	Prior to 10/15/19
Site 05	Annually prior to 10/15
Site 06	Prior to 10/15/19
Site 07	Prior to 10/15/19
POD	-
Cultivation Area B	Prior to 10/15/19

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 1, 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 1st following the year being monitored. The first Annual Report for this enrollment shall be submitted by March 1st, 2019 and report on monitoring done during the 2018 calendar year. Annual reporting is required each subsequent year of enrollment.

Implementation of Applicable BPTC Measures

Assessment of applicable BPTC measures consisted of a field examination on February 2, 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.).

Roads assessed by TRC during the site visit were found to be in acceptable condition with native and imported rock surfacing. Roads within the project area appear to have a 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.

One person uses the road during the cultivation period. During the winter season the property is occasionally accessed through the permanent road. Cannabis is processed offsite. The permanent access road is rocked with imported rock, and combined with the native rock, provides an adequate road surface with no erosional issues. Due to the low gradient nature of the road, no additional drainage features are required. The permanent access road is designed and surfaced in a manner that requires minimal, regular maintenance.

The seasonal access road surface contains a high native rock component, and has water bars that are presently functioning. No erosional issues were observed on the seasonal access road. A trail is used to access the water storage tanks above Cultivation Area A. No wheel ruts were observed on any of the access roads on the date of the site visit.

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

Presently there are no stream crossings on this property.

- 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.

During the project assessment, no legacy waste issues were identified.

- 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 the Mitigation Report, Treatment Implementation Schedule, and Site Map to follow for site specific details.

- 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.).

The Cultivator has limited and prevented erosion by, rock surfacing the permanent access road, from the gate at Wilder Ridge Road, up to the residence. Water bars have been placed on the seasonal use access road, following the recommended surface drainage break frequency. The Cultivator has prevented erosion by limiting the use of vehicles during the wet season and maintaining the water bars annually. No wheel ruts were observed in the seasonal use road. In the future, the Cultivator shall use measures prescribed in the BMP, to address the rills in the cut bank, above Cultivation Area A. Apply to the entire cut slope, a native seed mixture and mulching with either straw or wood chips. Additionally, jut matting can be placed on the cut slope, in order

to keep seed in place and establish adequate vegetation. See the Mitigation Report, Treatment Implementation Schedule, and Site Map to follow for site specific details.

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.

Not applicable.

- 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 measures are needed presently, to capture eroded sediment.

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 and all corresponding work shall be inspected prior to and in conjunction with winter monitoring, as described above under the "Monitoring Plan" to ensure proper placement, installation, and function remain intact prior to and throughout the Winter Period.

- 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.

Not applicable.

- 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.

Currently, no soil stabilization measures are needed.

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