SITE MANAGEMENT PLAN

(NCRWQCB Water Resource Protection Plan)

In fulfillment of Order WQ 2017-0023-DWQ & NCRWQCB Order No. 2015-0023

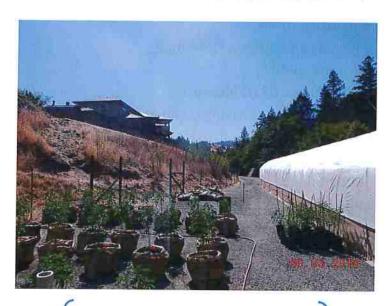
General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities

Prepared for:

Dobbyn Creek Pharm

and

State Water Resources Control Board



Tier 2, High Risk Discharger WDID: 1B170089CHUM, Tier 2

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INTRODUCTION

This Site Management Plan (SMP)/Water Resource Protection Plan (WRPP) has been developed to satisfy conditions of the Tier 2 enrollment requirements in the State Water Resource Control Board (SWRCB) Order No. WQ 2017-0023-DWQ (Order), and Order No. 2015-0023 for the North Coast Regional Water Quality Control Board (NCRWQCB). The purpose of the Order is to implement the Cannabis Policy requirements for waste discharges associated with cannabis cultivation. The Policy provides a structure for managing water quality and instream flow impacts associated with cannabis cultivation. It also establishes criteria for personal use and site conditional exemptions and includes a tiered approach for permitting discharges of waste. All eligible dischargers developing land for cannabis cultivation activities are required to enroll in the program under the Order. Dischargers must implement Best Practical Treatment or Control (BPTC) measures and submit technical and monitoring reports to assure compliance with the Order. The SMP describes how the discharger is complying with the applicable BPTC measures listed in the Policy and how they are being implemented property-wide.

SITE INFORMATION

Registrant:

Dobbyn Creek Pharm

PO Box 331 Alderpoint,

CA 95511

Site

Address:

22660 Alderpoint Road, Alderpoint, CA 95511

Parcel:

Assessor Parcel Number: 216-317-006 & 216-317-007

Lat/Long: 40.222°, -123.603°

Zoning:

General Plan: AG

Use code description: Improved Residential RA

(as per Humboldt Co Webgis)

Zone: Unclassified

Acres:

216-317-007 (22.74 acres) (Humboldt County WebGIS)

216-317-006 (17.03 acres) (Humboldt County WebGIS)

Disturbed Area on 216-317-007 (17,656 sq. ft = 0.405 acres) Disturbed Area on 216-317-006 (59,845 sq. ft = 1.374 acres)

Total Disturbed Area: (77,501 sq. ft = 1.779 acres)

Location:

The project site is located along Alderpoint road, in Alderpoint, CA. From

Eureka California, head south on Highway 101, travelling for

approximately 20 miles. Turn east onto Highway 36, and travel for approximately 24 miles before reaching Alderpoint Road. Turn right onto Alderpoint Road and continue along Alderpoint Road for approximately 24.5 miles before arriving at 22660 Alder Point Road (Project Site).

Site Description:

The site is located within the Dobbyn Creek watershed, a tributary to the Eel River. The Eel river is federally designated as a Wild and Scenic River. The Eel River are home to anadromous fish species, including steelhead, chinook, coho and sea-run cutthroat trout. The property (Project Site) is split between two parcels (216-317-006 and 216-317-007), which are contiguous but separated by Alderpoint Road. Parcel number 216-317-007 is located alongside the floodplain of the mainstem Dobbyn Creek and measures approximately 22.74 acres. Parcel number 216-317-006 is located alongside North Fork Dobbyn Creek, and measures approximately 17.03 acres. Together these parcels comprise an area of 37.77 acres. These two parcels are referred to hereafter as the (Project Site). Both parcels on the Project Site are zoned "U" unclassified, with the use code descriptions given as "Improved, Rural Residential 10-20 ac". The Project Site is a mixture of grassland, riparian floodplain and terraces, and forested lands with fir and other coniferous species covering approximately 50% of the remaining lands. On each parcel, a single residence exists with associated outbuildings and garages. The climate is characterized by hot dry summers, and cool mild winters. Cultivation operations on the project site consist of full sun outdoor cultivation in above ground smart pots, and twelve (12) greenhouses utilized for mixed-light and full sun cultivation.

On APN 216-317-007, there exists 7,141 sq. ft of cultivated area. Of that, 1,697 sq. ft consist of completely outdoor plants, while the remaining 5,444 sq. ft of cultivation is conducted in greenhouses. No lights are used as part of cultivation operations. An interim permit from the County of Humboldt has been issued for 9,150 sq. ft of cultivation. To address setback related issues, the permit application will be changed from a conditional use permit to a zoning clearance certificate with the intent of transferring cultivation area by Retirement, Remediation and Relocation (RRR) program to another permittable site. A remediation plan is being created to address the existing cultivation operation and the planned removal.

On APN 216-317-006, there exists 19,500 sq. ft of cultivated area. Of that, 5,260 sq. ft consists of completely outdoor plants. The remaining 5,260 sq. ft of cultivated outdoor area are located on a large flat which was previously developed as a mobile home park. A total of 14,400 sq. ft of cultivated space occur in greenhouses on the same flat previously developed as a mobile home park. Cultivation occurs on land which was previously developed and is mostly flat. Recent earth work activities have only lightly reshaped existing grades of previously disturbed areas. Rainfall for the region averages 58.24-inches per year. Water storage volumes for the site currently total 18,500 gallons in rigid

plastic storage tanks. Water is diverted from an unnamed tributary to North Dobbyn Creek by way of a surface water diversion.

TIER AND RISK DESIGNATION

The Cannabis Policy provides criteria for evaluating threats to water quality for cannabis cultivation sites based on three site characteristics: proximity to water body, total disturbed area, and slope of the disturbed area. Based on the criteria and site characteristics the subject property is designated as a **Tier 2 Discharger**. The total disturbed area is 2.026 acres (Table 1). A large portion of disturbed areas represent recent reshaping or "scraping" efforts by the current landowner. All identified "disturbed areas" as part of existing developed flats represent little actual earthwork or soil movement. The existing flat portions of the property were regraded and then rocked with gravels to reduce surface erosion. Revegetation and erosion control efforts are currently in place to address the disturbance areas associated with these previously developed flats.

Table 1: Disturbed Area Size, Slopes, and Setbacks

Disturbed Area Type	Area (ft²)	Disturbed Area Slope	Distance to Water Body (ft.)	Water Body Type
Cultivation Areas	26,641	24.375%	<50	Class I Watercourse
Road portions needing upgrades / remediation	2,676	26.25%	500	Class I Watercourse
Developed Flats (not including adjoining road portions)	47,142	26.25%	60	Class I Watercourse
Garage Structure (storage)	1,042	26%	80	Class I Watercourse
Water Storage Tanks	301	18.6%	490	Class I Watercourse
Total Disturbed Area	77,501	24.375%	-	<u>-</u>

The main access road used to access the parcel Alderpoint Road, a road maintained by Humboldt County. All cultivation takes place on developed flats. Cultivation activities on APN 216-317-007 take place within the riparian buffer zone of Dobbyn Creek, and will be relocated to observe the necessary setback requirements. Recent grading activities on the project site include the recontouring the of the fill slope portion of Alderpoint road. The reshaping of these fill areas is not intended to be used for cultivation related activities. Fruit and ornamental tree installation on the middle "benched" portion of these fill slopes is planned for the near future. The southernmost portion of this recent grading work is

within the 63-feet of North Dobbyn Creek. Disturbance area on APN 216-317-006 is primarily comprised of a large flat feature and associated fill slopes which was recently resurfaced. This parcel was historically used as a mobile home park, with the existing flat areas being repurposed for commercial cannabis cultivation. All grading and disturbed areas on the northern parcel (006) are of sufficient distance from any watercourses but should have appropriate BPTCs implemented to protect against erosion of the bare soils. Disturbance areas calculated as part of the impacts on the project site have been taken to include active cultivation sites, graded pads, road portions which require remediation to prevent erosion, and accessory outbuildings (storage garage). The residential structures on the Project Site pre-date cultivation activities on the project site, are permitted with the County of Humboldt, and are not incorporated in "Disturbance Area" totals. One portion of the access road used to access the water storage facilities requires upgrading. At this location, one rolling dip has been prescribed as part of the Water Resource Protection Plan (WRPP) and Site Management Plan (SMP) to hydrologically disconnect the road from surface waters and prevent continued erosion along the road surface. In general, roads on the Project Site are maintained according to the guidance provided by the Handbook for Forest, Ranch, and Rural Roads ("Road Handbook") by Pacific Watershed Associates. Thus, as described in section 1.1.2 below, only that portion of the road not meeting the design criteria for road performance has been included in the total disturbed area. See the disturbed area map in Appendix B for specific areas included in the disturbed area.

In addition, a risk designation is assigned based on the slope of the disturbed areas and proximity to a waterbody. Based on these parameters, the subject property is designated as a **High Risk.** The total disturbed area of 2.026 acres exists on the Project Site between the two parcels, all of which is located on slopes less than 30%. All cultivation areas consisting of 7,141 sq. ft on APN 216-317-007 are located within the riparian buffer zone of Dobbyn Creek, a Class I watercourse. All cultivation activities on the parcel will be relocated in the future through the County of Humboldt RRR program in order to meet riparian setback requirements.

BEST PRACTICAL TREATMENT OR CONTROL (BPTC) MEASURES

BPTC measures are being utilized as part of the road maintenance program to protect water quality. The *Solid Waste Management, Construction Site Best Management Practices Manual* by the CA Department of Transportation (Caltrans) is referenced for the correct installation, maintenance, and monitoring of all applicable erosion control and sediment capture BPTC measures.

All straw mulch must be free of noxious weeds and all seed/plants must be non-invasive. A list of prohibited species can be found in the CA Invasive Plant Council's database. Erosion control measures shall not include synthetic monofilament netting, including photo- and biodegradable plastic netting. All netting shall be made of jute, coir fiber, hemp, or another product without welded weaves. The enrollee has purchased and is currently implementing

"ROLLMAX" BioNET C125BN Erosion Control Blankets. These erosion control blankets are made of 100% coconut fiber with interwoven 100% biodegradable natural organic fiber netting utilizing a "leno-weave" pattern. This product meets type-4 specification requirements established by the Erosion Control technology Council (ECTC) and Federal Highway Administration's (FHWA) FP-03 Section 713.17.

A schedule of BPTC measures to be implemented and maintained throughout the site is shown in Appendix C, and Appendix D includes specifications for BPTCs.

1. SEDIMENT DISCHARGE BPTC MEASURES

1.1. SITE CHARACTERISTICS

1.1.1. SITE MAP

The site map shows all relevant site features: streams, stream crossings, storage areas, roads, buildings, domestic wastewater treatment system, cultivation areas, and other disturbed areas related to cultivation activities. Erosion prevention and sediment control BPTC measures are identified on the site map (see Appendix A).

1.1.2. ROAD CONDITIONS

The road used to access the site is Alderpoint Road, a county-maintained road. Both parcels on the Project Site are located adjacent to Alderpoint road, as such an extensive access road network does not exist. On APN 216-317-007 the access road (driveway) used to access the residence, cultivation area and garage is newly paved and in good shape and does not require upgrading. Further to the East along AlderPoint Road, a second access driveway exists on the Project Site, and consists of a gravel driveway. This driveway appeared to be well constructed and did not exhibit hydrologic connectivity to surface waters. On APN 216-317-006, the access road (driveway) used to access the project site is comprised of native material with gravel surfacing. The access driveway is in good shape and does not require upgrading. Used to access the water tank farm, a native material upper access road running northwest from the large graded pad lacks permanent drainage features and requires the installation of one (1) rolling-dip to disconnect the road network and prevent surface erosion along the road surface. Two separate driveways are used as part of operations on the Project Site. Between the two parcels, the main entrance roads receive approximately 14 daily vehicle trips in the peak season (May - October) and 0-2 vehicle trips in the winter (driveway) main access road The season. APN 216-317-007 is paved with asphalt. All other roads between the two parcels on the Project Site are composed of native materials and in general are appropriately designed and maintained. Additional road maintenance is prescribed in section 1.2.1.

1.1.3. WATER BODIES, STREAM CROSSINGS, RIPARIAN SETBACKS
The Project Site borders North Dobbyn Creek and Mainstem Dobbyn
Creek, and does not contain any surface water crossings.

A Lake or Streambed Alteration Agreement (LSAA) with the California Department of Fish and Wildlife (CDFW) will be sought to address the use of the surface water diversion on the unnamed tributary to North Dobbyn Creek for the cannabis cultivation.

All cultivation areas and the garage used for storage on APN 216-317-007 are within the riparian buffer zone of a Class I watercourse (Dobbyn Creek) and must be relocated. Field observations indicate that cultivation activities and developments on the Project Site do not represent an immediate threat to water quality. Good housekeeping practices look to be in place at all times on the Project Site. As part of the planned relocation and remediation, the cultivation areas will be relocated to a more suitable area. The areas previously containing cultivation area will be seeded and mulched with erosion control seed and hay. Straw wattles will be placed along the break in slope between the developed flat and Dobbyn Creek to ensure that any mobilized particles are entrained in the erosion control measures, and do not migrate to surface waters. The garage storage facility will be retroactively permitted or removed if permitting is not possible with the Humboldt County Building and Planning department. Once the cultivation areas and garage located within the riparian buffer zone have been relocated, the Project Site will meet the setback requirements of the Order.

1.1.4. SOIL DISTURBANCE

The Project Site has multiple areas of active soil disturbance. Recent grading has occurred on previously disturbed ground. On APN 216-317-007, the fill slope portion of Alderpoint road has been reshaped to include a single small "bench", approximately 8-10-feet wide midway downslope. Fruit and ornamental trees are planned as part of the revegetation process and will be planted along the newly created "bench". The graded areas constituting disturbance area on this parcel total 9,473 square feet. On APN 216-317-006, a large existing flat was resurfaced and shaped, which included the addition of a small flat and the realignment of an existing native material access road. Disturbance areas total 40,345 square feet on APN 216-317-006. The site should be continually monitored during wet weather to ensure that sediment mobilization does not occur resulting in delivery to surface waters.

1.2. SEDIMENT EROSION PREVENTION AND SEDIMENT CAPTURE

1.2.1. EROSION PREVENTION BPTC MEASURES

1.2.1.1. ROADS

To break up hydrologic connectivity and mitigate road surface erosion, one (1) type-1 rolling dip will be installed along the access road used to access the water storage tanks, see Appendix A for the recommended location.

Erosion prevention measures along the native material access road and graded flat will be implemented during the dry summer months. The road construction standards described in the "Road Handbook" will be adhered to for all road improvements. See Appendix C for the Schedule of BPTC Implementation and Maintenance.

1.2.1.2. DISTURBED AREAS

All cultivation activities are occurring on graded flats and landings. All roads and developed areas appear stable and settled, with no obvious indicators of failure (scarping, cracking, slumping) apparent on any exposed surfaces. As grading/reshaping activities have occurred relatively recently, the pad surfaces and fill slopes are not well vegetated. Any required work resulting in exposed soil within disturbed areas will be seeded and mulched with straw. All existing live mulch will be maintained as feasible. The enrollee has purchased and is currently implementing "ROLLMAX" BioNET C125BN Erosion Control Blankets. These erosion control blankets are made of 100% coconut fiber with interwoven 100% biodegradable natural organic fiber netting utilizing a "lenoweave" pattern. These erosion control blankets will be applied to the fill slopes to protect the erosion control seeding from physical erosion (wind & precipitation) as well as protect the bare earth fills slopes from physical erosion during the interim period during which vegetation is re-established. Any areas for planned disturbance/development will be surveyed for sensitive species, wildlife, and communities, and CDFW shall be consulted with to designate a no-disturbance buffer if necessary.

1.2.1.3. STREAMS AND STREAM CROSSINGS

No surface water crossings exist on the Project Site. Cultivation activities on APN 216-317-007 do not meet the setback requirements as per riparian buffer zones of the Order and will be removed to observe the 100-foot setback requirement. Although the cultivation is occurring within the riparian buffer setbacks, no sediment delivery is occurring.

1.2.1.4. WINTERIZATION

Winterization measures will be implemented annually by November 1st and interim erosion prevention BPTC measures will

be utilized as needed throughout the year. To prevent erosion and sediment transport to streams, numerous measures for soil stabilization, runoff management, erosion and sediment prevention/retention are utilized throughout the seasonally dry period and prior to the onset of winter. Section 5 "Winterization BPTC Measures" has more information on proposed actions to protect water quality in the winter season.

1.2.2. SEDIMENT CAPTURE BPTC MEASURES

1.2.2.1. ROADS, STREAM CROSSINGS, AND SOIL DISTURBANCE

One large soil pile observed on the Project Site is well sited and sufficiently far from surface waters to prevent delivery to surface waters but lacks appropriate BPTCs as per The Order. To properly winterize any soil piles on the Project Site, surround the pile with straw wattles and utilize cover crops or tarps to prevent precipitation and runoff from mobilizing sediment and the constituent components of many potting soils. If winter conditions preclude the use of cover cropping throughout the wet weather season, tarps or a constructed roof covering will be utilized to prevent piles from washing away and remaining nutrients from leaching into groundwater. Straw wattles will be utilized around soil piles to further mitigate sediment transport during wet weather events.

See 1.2.1.1 for road related BPTCs and prescribed treatments.

The graded pads on the Project site must be revegetated with erosion control seed and mulched to protect against erosion. BPTCs should include the use of slope protecting Rolled Erosion Control Products (RECP), hydroseed, and staked straw wattles on the toe of fill at the break in slope to prevent sheet flow from carrying entrained particulate from the bare soil pad and fill slopes. As per Attachment A (pg. 47, no. 128) cannabis cultivators shall apply linear sediment controls along the toe of the slope, face of the slope and at the grade breaks of exposed slopes to comply with sheet flow length restrictions. For slopes (percent slope) between 25-50%, sheet flow length shall not exceed 15-feet. Thus, at each break in slope, toe of slope, or unbroken length of disturbed slope measuring 15-feet in length, a linear sediment control must be utilized until vegetation is re-established such that sheet flow does not result in erosion or scour of bare soil.

Stockpiled materials for construction and road maintenance will be stored in stable locations and contained using appropriate BPTC measures. Other sediment control measures may be installed as needed to prevent discharges from entering waters of the state. See Appendix C for the schedule of all sediment control BPTC measures being employed on site.

1.2.3. MAINTENANCE ACTIVITIES - EROSION PREVENTION AND SEDIMENT CAPTURE

1.2.3.1. MONITORING

All long-term and interim erosion prevention and sediment capture BPTC measures that have been implemented will be monitored for effectiveness once monthly at a minimum (Table 1.2.3.1). Any vegetation planted on previously disturbed areas will be monitored for success and replanted as necessary. The cultivator will monitor erosion and sediment control measures during and after each storm event that produces at least 0.5 in/day or 1 in/7 days of precipitation. In addition, winterization measures that are implemented will be monitored for effectiveness (inspected during the first major winter storm event) before the site is closed for the winter. See Appendix H for a log of monthly BPTC monitoring and maintenance records.

Table 1.2.3.1. BPTC Effectiveness Monitoring

Monitoring Requirements	Description	Monitoring Frequency
Winterization Measures Implemented	Report winterization procedures implemented, any outstanding measures, and the schedule for completion.	October - May
Tier Status Confirmation	Report any change in the tier status. (Stabilization of disturbed areas may change the tier status of a facility. Contact the Regional Water Board if a change in status is appropriate.	Upon meeting riparian setback requirements.
Erosion Prevention and Sediment Capture Maintenance	Report activities for maintaining the effectiveness of erosion prevention and sediment retention/capture measures	Monthly
Active Erosion	Report any indications of soil erosion	Monthly
Surface Water Runoff Maintenance	Report the conditions of any surface water (stormwater, irrigation) and include the location, source of runoff, duration	Monthly

Salara and Arthur and Committee	The state of the s	
musikostati mo	Turbidity - conduct sampling once per month when	
Stormwater	precipitation exceeds 0.25 in/day or when	October-May as
Runoff	stormwater runoff is generated on site	necessitated by
Constituents	pH – conduct sampling once per month when	rainfall
th de death the	precipitation is forecast to exceed 0.25 in/day	
Disturbed	High risk dischargers shall provide a status report	
Area	describing activities conducted to stabilize the	Monthly
Stabilization	disturbed area with the setback	
Materials		
Storage	Report materials delivered or stored on site that	
Erosion/	have the potential to degrade water quality if	Monthly
Spills	discharged	J
Prevention		
Septic,		
Holding		
Tank, or	Report the name of the servicing company, dates,	200 100
Chemical	and activity	Monthly
Toilet		
Servicing		

1.2.3.2. MAINTENANCE

Year-round maintenance of all erosion prevention and sediment capture measures is required. All existing measures shall be maintained, repaired, or replaced as needed. Exotic or invasive species found in revegetated or disturbed areas shall be removed. Remaining exposed soil shall be reseeded/revegetated and have 2-4" of weed-free mulch reapplied. Any captured sediment in inboard ditches/drainageways, culvert outfalls, or against silt fences/straw wattles will be removed and stabilized on a designated flat area. The sediment may be used for site improvement where it will not threaten water quality. Interim measures for sediment retention, such as mulching and wattling, require more regular monitoring and maintenance. See Appendix H for a log of monthly BPTC monitoring and maintenance records.

2. FERTILIZER, PESTICIDE, HERBICIDE, AND RODENTICIDE BPTC MEASURES

2.1. CULTIVATION PRODUCT STORAGE, USE, AND DISPOSAL

2.1.1. STORAGE

Fertilizers and insecticides are stored on APN 216-317-007 in the garage located adjacent to the cultivation area and are stored in secondary containment to prevent contact with groundwater. Fertilizers and

pesticides are being stored in a separate location from petroleum products. No rodenticides are currently being used on site. At the end of the season, any unused liquid products are stored in secondary and applied the following year (see Site Map in Appendix A for storage locations). Soil and fertilizers may temporarily be stored in or near the greenhouses prior to being applied.

Appropriate BPTC measures are being utilized when storing, handling, mixing, applying, and disposing of all fertilizers, pesticides, herbicides, and rodenticides. Each year an inventory is conducted prior to the beginning of the grow season and necessary products are delivered to the site as needed. See Appendix G for a list of fertilizers and pesticides/herbicides used on site.

2.1.2. APPLICATION

Mixing of fertilizers in small storage tanks is conducted in a designated area where the mix will not enter surface waters. For all plants, the mix is applied via controlled hand watering. Spent soil is amended and reused as needed. The application of any agricultural chemical products will be conducted according the manufacturer's recommendation.

2.1.3. DISPOSAL AND SPILL PREVENTION/CLEANUP

Trash and recycling containers are located near the existing residences and are contained to prevent surface water contamination and wildlife intrusion. Soil is reportedly cycled yearly and is only stored temporarily. Excess soil not slated to be reused or mulched will be disposed of properly along with other cultivation products, and any resulting disturbed areas will be seeded and covered with straw to prevent erosion. Spent product containers are carefully transferred from the mixing area to the refuse area. A spill kit with plenty of sorbent pads is kept on site in the event of a spill. All trash, empty product containers, and other recycling are hauled off-site weekly to the nearest Waste Management Facility on a weekly basis.

3. PETROLEUM PRODUCT BPTC MEASURES

3.1. PETROLEUM STORAGE, USE, AND DISPOSAL

Table 3.1. Petroleum Product List, Storage, and Use

Petroleum Product	Delivery Period	Storage Method	Use Type
Gasoline	As needed throughout the year	5- gallon storage cans, in covered garage with secondary containment	Power for small engines.

Lubricants	As needed throughout the year	In storage shed within secondary containment	Equipment maintenance
Propane	As needed	500-gallon propane tank	Domestic (heating, cooking, etc.)

3.1.1 STORAGE

The discharger has a 500-gallon propane storage tank, used to provide fuel for domestic energy needs. Small amounts of gasoline (5-gallon gas cans) are kept on the project site to fuel small powered garden equipment. Fuel cans are stored within a covered garage, in secondary containment. The gasoline powered equipment lacks secondary containment and appropriate cover, both of which will be implemented by the end of the 2018 cultivation season. The propane tank is serviced by a licensed professional periodically throughout the year. Lubricants utilized for small engine maintenance are being stored in secondary containment when not in use. Vehicles and machines are regularly monitored for leakage and when not in use are being stored in a location outside riparian setbacks.

3.1.2. APPLICATION

Fueling and maintenance of the gasoline engines, cars, and other machines is being conducted in a designated area that prohibits discharge to waters of the state.

3.1.3. DISPOSAL AND SPILL PREVENTION/CLEANUP

Special care is taken when transporting and handling all petroleum products. Spill prevention/cleanup BPTC measures are being utilized; a spill kit with plenty of sorbent pads is kept on site in the event of a spill. Spent petroleum products and related trash are kept in secondary containment, specifically for hazardous waste, before being transferred to the waste management facility.

4. TRASH/REFUSE AND DOMESTIC WASTEWATER BPTC MEASURES

4.1. HOUSEHOLD TRASH AND CULTIVATION-RELATED WASTE

All trash / refuse generated on site is currently in secured wood-sheds. These enclosed and designated areas prevent contact with wildlife and precipitation. Expected trash/refuse generated on site will be comprised of domestic wastes including food and sanitation items as well as cultivation related wastes (empty nutrient containers, associated packaging and consumable items). All trash items will be kept in a designated area near the residence (see site map in Appendix A) where it will not migrate or leach into waters of the state. Cultivation-related organic wastes are stored in a

designated area and stabilized with the appropriate BPTC measures (see appendix A, Site Plan for location). Cultivation wastes are then taken to the nearest waste management facility along with all other disposable wastes generated onsite at regular (weekly) intervals. Wastes are not stored onsite for prolonged periods of time. Spent potting soil is stored in a secure location and will be stabilized using appropriate sediment control BPTC measures. Spent potting soil is only kept onsite for short periods of time and is reportedly sold to neighbors.

4.2. RESIDENTS, EMPLOYEES, AND VISITORS

Approximately 2 residents are on site during the growing season, and a maximum of 18 employee are on site during the peak operation season. There are 2 residents on site in the winter season.

4.2.1 DOMESTIC WASTEWATER - GENERATION

The households produce greywater from the kitchen sinks, and blackwater from the restroom facilities within the domestic residences.

4.2.2 DOMESTIC WASTEWATER - DISPOSAL

Household greywater and wastewater from the kitchen sink and toilet drains a permitted septic system, adjacent to the domicile. The system will be inspected by a septic professional and will be improved if necessary for permitting through the Department of Health and Human Services. In the interim, a portable toilet will be delivered to the upper site (APN 216-317-006) and will be serviced as needed by a licensed company. See the site map in Appendix A for locations of wastewater treatment locations. The cultivator shall make sure that no substances that are hazardous to fish and wildlife (e.g. trash, paint, concrete washings, treated wood) are used, located, or disposed of where they can contaminate waters of the state. Human and animal waste shall also be disposed of properly.

5. WINTERIZATION BPTC MEASURES

5.1. ACTIVITIES AND MAINTENANCE

5.1.1 ROADS AND STREAM CROSSINGS

Appropriate erosion prevention and sediment control measures will be installed, maintained, and monitored for effectiveness prior to the winter season. Road work requiring heavy machinery (rolling dip installation), shall be conducted only during the dry season, unless the cultivator is authorized by an agency with jurisdiction to make emergency repairs. The access road leading to the tank farm has excessive sheet flow lengths that will be broken up with the installation of a rolling dip (see Appendix A for proposed

locations). Winterization of the main access road includes temporary and long-term runoff management. Winterization of the site will include the installation of appropriate BPTC measures relevant to the mitigation of sheet flow and erosion on the recently resurfaced pads. Additional measures include the installation of straw wattles at the break in slope between Dobbyn Creek and the existing greenhouses on APN 216-317-007. Further straw wattles should be applied along the recently cleaned flats as per section Sediment Erosion Prevention and Sediment Capture, 1.2 (1.2.2.1), above. All winterization BPTC measures will be monitored and maintained prior to site closure for the winter.

5.1.2. DISTURBED AREAS

Areas that have exposed soil shall be seeded/hydroseeded and mulched to prevent erosion and sediment delivery to a waterbody. Any revegetation shall take place at the onset or at the end of the precipitation season to ensure establishment. Exposed slopes shall have linear sediment controls, such as wattles or silt fences, to interrupt sheet flow lengths. All disturbed areas will be inspected for potential and active erosion issues. Such sites will be repaired/controlled as needed using appropriate BPTC measures. For all areas of concern, if any BPTC measures cannot be installed prior to winter, the Regional Water Board must be contacted to establish a compliance schedule to protect water quality.

The graded pads on the Project Site must be revegetated with erosion control seed and mulched to protect against erosion. BPTCs should include the use of slope protecting Rolled Erosion Control Products (RECP), hydroseed, and staked straw wattles or silt fences on the toe of fill at the break in slope to prevent sheet flow from carrying entrained particulate from exposed soils. As per Attachment A (pg. 47, no. 128) cannabis cultivators shall apply linear sediment controls along the toe of the slope, face of the slope and at the grade breaks of exposed slopes to comply with sheet flow length restrictions. For slopes (percent slope) between 25-50%, sheet flow length shall not exceed 15-feet. Thus, at each break in slope, toe of slope, or unbroken length of disturbed slope measuring 15-feet in length or greater, a linear sediment control must be utilized until vegetation is reestablished such that sheet flow does not result in erosion or scour of bare soil.

5.1.3. STORAGE AND STOCKPILED MATERIALS

5.1.3.1. CULTIVATION-RELATED PRODUCTS AND WASTE
All fertilizers, pesticides, herbicides, and rodenticides need
to be stored where they will not enter surface waters or
pose a threat to wildlife. The cultivator will have all liquid
products stored in secondary containment and stored along

with all other cultivation-related products, protected from the elements. Waste associated with cultivation will be removed from the site and taken to the Fortuna Waste transfer facility prior to closing the site for winter.

5.1.3.2. VEHICLES, MACHINES, AND PETROLEUM PRODUCTS/WASTE

Prior to winter, any remaining vehicles or machines on-site will be stored out of the elements where any potential leaks will not enter surface waters or pose a threat to wildlife. The generator shed will also be locked to prevent wildlife intrusion. Petroleum products will be kept in compatible secondary containment within their own storage container. Any spent petroleum containers and related trash will be removed and appropriately disposed of at the Petrolia waste management facility.

5.1.3.3. STOCKPILED MATERIALS

Appropriate BPTC measures shall be used for all stockpiled materials that have the potential to migrate to surface waters or that may be hazardous to wildlife. Stockpiled materials include bark, sawdust, potting soil, amendments, rock, compost, treated wood, polytube and other irrigation equipment, greenhouse plastic sheeting, and any other materials used for cultivation and site development, improvement, and management. They shall be stabilized in an upland area, covered, and/or stored in a storage shed/container.



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VICINITY MAP NOT TO SCALE



SHEET INDEX:

SMPO - SMP PLOT PLAN AND VICINITY MAP SMP1 - AREA 1 PLAN SMP2 - AREA 2 PLAN



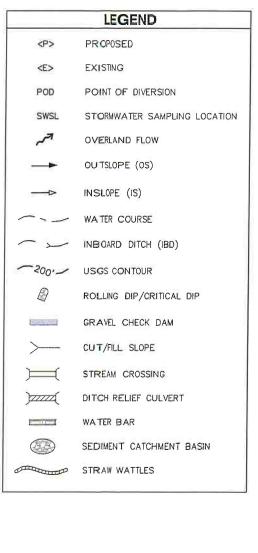
DOBBYN CREEK PHARM, LLC. / APN:216-317-006 AND 007

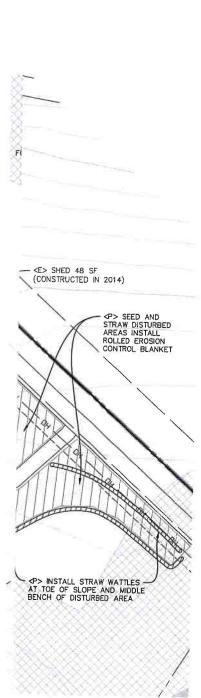
SMP PLOT PLAN AND VICINITY MAP

ALDERPOINT ROAD, ALDERPOINT, CA 95511

WHEY: TJS 09-05-18 AS SHOWN SHEET

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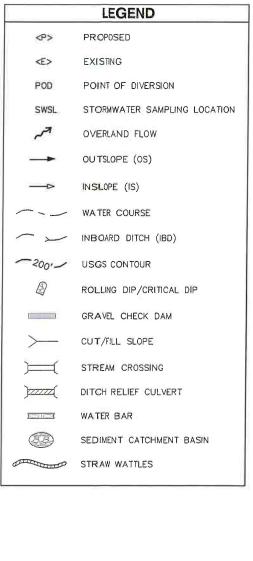


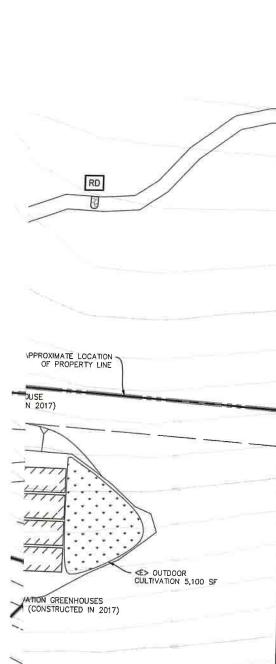


DOBBYN CREEK PHARM, LLC. / APN:216-317-006 AND 007 ALDERPOINT ROAD, ALDERPOINT, CA 95511

AREA 1 PLAN

09-05-18 AS SHOWN







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AREA 2 PLAN

DOBBYN CREEK PHARM, LLC. / APN:216-317-006 AND 007 ALDERPOINT ROAD, ALDERPOINT, CA

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