

Site Management Plan

(Tier 1, Low Risk)

WDID- 1_12CC404461

Humboldt County
APN: 220-311-004-000 & 220-272-022-000

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TRC 417

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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 220-311-004-000 & 220-272-022-000, 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. Cannabis cultivators 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 cannabis cultivator 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 consists of two contiguous parcels totaling approximately 96 acres located approximately 1 ¾ miles north of Briceland, California, at an elevation of approximately 2,000 feet above mean sea level. The property is located in Section 1 in T4S, R2E and Sections 6 & 7 in T4S, R3E, HB&M, Humboldt County, of the Ettersburg USGS 7.5' Quad. Unnamed watercourses flow south-north on the northern edges of the property, which are tributary to Seely Creek, which is tributary to Redwood Creek and the South Fork Eel River.

Project Description

Cannabis cultivation on the property consists of one 34' x 50' greenhouse, one 24' x 50' greenhouse, and approximately 21,720 ft² of outdoor cultivation, for a total, general cultivation area¹ of 24,520 ft². The cultivation area is located within 29,080 ft² of disturbed area, which is located in one distinct area on the property. There is a total of approximately 29,080 ft² of disturbed area on the property. The cultivation area is located greater than 200' from surface waters. This project was not previously enrolled in the North Coast Regional Water Quality Control Board Order No. R1-2015-0023.

Table 1: Cultivation Site Parameters.

Cultivation Area	Land Disturbance Area (ft ²)	General Cultivation Area ¹ (ft ²)	Adjoining Hillslopes (% Grade)
A	29,080	24,520	5 – 15%
Totals:	29,080	24,520	

Table 2: Project Permitting

Additional Required Permits Related to Project, Type, and Status	
SIUR	Small Irrigation and Use Registration-Filed with Division of Water Rights #H500447
LSA-1600	Final Agreement from CDFW - Notification No. 1600-2015-0460-R1
401	Not Required
404	Not Required

¹ General cultivation area refers to definable areas or groupings of closely situated cannabis cultivation. This designation does not, in any way, reflect the actual cannabis canopy area permitted or present during the assessment of the project area.

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

This project is newly enrolled in the State Water Quality Control Board Order No. WQ 2017-0023-DWQ.

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), and “trail” (being rarely used for occasional access to features on the property).

Roads within the project area appear to have a moderate native and imported 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)				
	0–3	4–6	7–9	10–12	>12
High to moderate	250	160	130	115	100
Low	400	300	250	200	160

Roads being classified as permanent shall be appropriately surfaced (crushed rock, lignin treatments, pavement, or chip-seal) to increase durability during winter use.

Roads assessed by TRC were found to be in acceptable condition with native and imported rock surfacing. The majority of access roads are out-sloped or crowned and adequately drained to allow surface water drainage. No wheel ruts were observed on the access roads on the date of the site visit. Only the shared access road, Perry Lane and Elk Ridge Road, along the southern and western property boundary and the seasonal access road to the Point of Diversion (POD) requires maintenance and treatment. Perry Lane and Elk Ridge Road are maintained by a road owners association, which regularly maintains the road that border the project property. Treatments prescribed in this report may or may not be performed by, or in conjunction with, the road owner’s association. See the Mitigation Report and Site Map to follow for site specific details and treatment schedules. There are no legacy roads on the property.

Controllable Sediment Delivery Sites (CSDS) were found on the property. Runoff and sediment from Sites 02, 03, and 06 was found discharging into surface waters. See the Mitigation Report, Treatment Implementation Schedule, and Site Map to follow for site specific details.

No unstable areas were observed.

Cleanup, Restoration, and Mitigation:

Project Compliance Y/N

No revegetation is being prescribed.

Stream Crossing Installation and Maintenance:

Project Compliance Y/N

No watercourse crossings were identified during the assessment of the property.

Soil Disposal and Spoils Management:

Project Compliance Y/N

Currently, no spoils are present on the property. Any/all 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 areas.

Table 4: Riparian and Wetland Protection and Management

Disturbed Area	Disturbance Area Distances and Encroachments ²				
	Class I [Setback: 100'] ²	Class II [Setback: 100']	Class III [Setback: 50']	Perennial Spring or Wetland [Setback: 50'] ²	Disturbed Area Within Setbacks [ft ²]
Cultivation Area A		>200'	>200'		0
	Total =				0

²This enrollment was previously enrolled in RWQCB Order No 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 derived from a permitted surface water diversion. This diversion meets and exceed the required water demands for agricultural use. At present there is no metering devices in place to record water usage associated with the irrigation of cannabis. A metering device shall be installed in 2019 to meter all water used for the irrigation of cannabis. Monthly water usage shall be recorded for annual reporting purposes.

Water is stored in six 5,000-gallon tanks and two approximately 11,000-gallon concrete tanks. Fertilizer mixing occurs in an approximately 550-gallon tank located in front of the fertilizer storage shed. Tank lids shall be kept closed at all times when access is not needed. Tanks that do not utilize lids shall be retrofitted to be enclosed from wildlife. Overflow prevention measures be installed on diversion infrastructure or water storage tanks to prevent the overflowing of tanks and unnecessary diversion of water resources when water storage infrastructure has filled. Water conservation measures such as in ground planting and mulch or cover cropping of cultivated top soils are already being implemented.

At this time the discharge has 52,000 gallons of water storage installed. Based on estimates, this volume of storage is insufficient to allow for full forbearance during the required period from April 1st to October 31st. Using water use estimates, the cannabis cultivator is to install and fill approximately 23,000 gallons of additional storage prior to the Forbearance Period for 2019/2020. Recorded water use data shall be used to determine remaining, or exact, 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 2021. Less water storage may be sufficient if recorded water usage numbers determine that actual water use is less than estimates. Monthly water usage estimates and the season total are as follows below.

Table 5: Estimated Annual Water Use

	Jan	Feb	March	April (25%)	May (60%)	Jun (80%)	Jul (100%)	Aug (100%)	Sep (70%)	Oct (20%)	Nov	Dec
Agriculture				4,276	9,931	13,241	16,551	16,551	11,586	3,310		
Sq. ft. =								% = percent of peak usage				
24,520												
								Total AG Water Use =			75,445	

There is domestic water use at this time, on this 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 use. Additionally, if there are multiple diversions of surface water, infrastructure/metering device(s) shall be design/installed in a manner that each source of surface water is recorded separately.

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, has been finalized as of the writing of this assessment. Any additional guidelines, treatments, or restrictions set forth under the finalized Lake and Stream Agreement shall be followed.

Irrigation Runoff:

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

Fertilizers, Pesticides, and Petroleum Products:

Project Compliance Y /N

Fertilizers and soil amendments are currently stored properly in sheds north of the cultivation area, west of the primary residence.

Fertilizers, potting soils, compost, and other soils and soil amendments are to be stored in structures on the property 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 pesticide products is consistent with product labeling and all products on the property are to be currently stored in closed structures to ensure that they do not enter or are released into surface or ground waters.

Currently, fuel storage or petroleum products is present on the property. Small quantities of fuel and motor oil are stored within fuel canisters, or the original container, within the structure to the northeast of the cultivation area. Any/all fuel canisters and motor oil containers shall be stored in secondary containment (e.g. plastic totes or sealed metal boxes) while being stored long term or not in immediate use, wherever these materials are used anywhere on the property. Fuel is also temporarily stored within a transfer tank used to fill up equipment on the property. Fuel is not stored long term within the transfer tank

Any/all future petroleum products and other liquid chemicals, including but not limited to diesel, biodiesel, gasoline, and oils shall be stored so as to prevent their spillage, discharge, or seepage into receiving waters. Storage tanks and containers shall be of suitable material and construction to be compatible with the substance(s) stored and conditions of storage such as pressure and temperature. Above ground storage tanks and containers shall be provided with a secondary means of containment for the entire capacity of the largest single container and sufficient cover shall be provided to prevent any/all precipitation from entering said secondary containment vessel. Cannabis cultivators shall ensure that diked areas are sufficiently impervious to contain discharged chemicals. Cannabis cultivators 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 cannabis cultivator 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.

Monofilament (e.g. plastic trellis netting and fencing) was observed on the property during the assessment. All monofilament netting or fencing is banned for future use. All existing monofilament netting shall be collected, secured with other refuse, and disposed of properly a waste disposal facility.

Organic cultivation-related wastes are collected from the cultivation areas and either disposed of properly with general waste, or composted or burned in a pile to the southwest of the cultivation area. The cannabis cultivator shall ensure that the locations where organic wastes are stored, composted, or burned are minimized in number and are sited outside of watercourse riparian areas and away from any form of surface runoff.

Non-organic cultivation-related wastes are stored in lidded trashcans and garbage bags adjacent to, or in, the fertilizer storage shed and cultivation areas, and are disposed of regularly at a solid waste transfer station. The cannabis cultivator shall continue to gather and properly dispose of cultivation-related wastes and ensure that wastes are adequately contained from scavenging wildlife, and cannot be transported away from storage areas by wind or surface runoff.

Refuse and Domestic Waste:

Project Compliance Y /N

Garbage and refuse are stored on the property within lidded trash cans and garbage bags within or adjacent to the residence, and in a repurposed dog cage to prevent scavenging wildlife from accessing the wastes. Refuse is disposed of regularly at the nearest solid waste transfer station. The cannabis cultivator shall continue to gather and properly dispose of refuse and ensure that refuse is adequately contained from scavenging wildlife, and cannot be transported away from storage areas by wind or surface runoff.

Human waste is managed by a permitted septic system on site. It is the cannabis cultivator'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.

- Any exposed soils resulting from winterization activities shall be seeded and straw mulched.
- 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 outsloping, waterbars, 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.
- 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.

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 220-311-004-000 & 220-272-022-000, 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.

Forrest Hansen

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Treatment Implementation Schedule

Unique Point	Proposed Work Completion Date
Site 01	Prior to 10/15/20
Site 02	Prior to 10/15/20
Site 03	Prior to 10/15/20
Site 04	Prior to 10/15/20
Site 05	As required
Site 06	As required
Site 07	Prior to 10/15/20
Site 08	As required
Site 09	As required
Site 10	Prior to 10/15/20
Site 11	Prior to 10/15/20
Site 12	Prior to 10/15/20

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 cultivators 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.

Attachments

Implementation of Applicable BPTC Measures

Assessment of applicable BPTC measures consisted of a field examination on February 22, 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 access road on the property is a permanent use road that has a locking gate at the entrance. The road appears to be generally well constructed, with a moderate native and imported rock component, and adequate outsloping and drainage features to minimize the development of surface erosion and concentrated road surface runoff. In general, the road has enough drainage features and is shaped adequately to promote surface drainage. However, one additional ditch relief culvert is required and existing drainage ditch relief culverts either require maintenance or replacement.

Currently, two employees utilize the access road approximately regularly during the cultivation season. The access road is used regularly during the Winter Period as there is a year-round residence.

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

No watercourse crossings were identified during the assessment of the 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.

Not applicable. No legacy waste discharge issues were identified during the assessment of 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 the attached Mitigation Report, Site Maps, and Treatment Implementation Schedule for site specific descriptions, treatments, and the 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.).

See the attached Mitigation Report and Best Management Practices (BMPs) for descriptions of physical BPTC measures being prescribed. There are no biological BPTC measures being prescribed.

- 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. No BPTC measures have been, or will need to be, implemented to capture sediment that has been eroded.

- 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.).

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 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.

Not applicable. There was no erosion observed at any of the disturbed areas and there are no improperly constructed features. Disturbed areas are located on gentle slopes surrounded by vegetation and grass buffers.

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. Fertilizers and soil amendments are currently stored properly in sheds north of the cultivation area, west of the primary residence.

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
Advanced Nutrients Line of Liquid Fertilizers	Brought to site in the spring. Stored within inside the storage structure with all other fertilizers and amendments.	Mixed into tank with water. It is then hand watered to individual plants as needed.	Stored within secondary containment inside the storage structure. Empty containers are disposed of at an appropriate waste disposal facility.

2.4. Describe procedures for spill prevention and cleanup.

Pesticides and liquid fertilizer containers are stored within a covered structure, within secured containers, with their lids secured after their use. The cannabis cultivator shall obtain adequate quantities of absorbent materials and ensure that they are stored at all locations where the materials above 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 will be removed and disposed of appropriately as per the manufacturer's guidelines.

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 when needed throughout the year.	Stored in standard 5-gallon gasoline canisters, separately from fertilizers, with structures on the property. Used to fuel equipment.	Stored in standard 5-gallon gasoline canisters, separately from fertilizers, with structures on the property.
Diesel	Brought to site when needed throughout the year.	Stored in a 100-gallon steel transfer tank either in a truck bed or on pallets when not in use. Used to fuel equipment.	Stored in a 100-gallon steel transfer tank either in a truck bed or on pallets when not in use.
Motor oil	Brought to site when needed throughout the year.	Stored in the shed. Used to lubricate internal combustion engines.	After oil changes, the used motor oil is stored in either the container it came in or in sealed 5-gallon buckets for later disposal at an appropriate waste disposal facility.

3.4. Describe procedures for spill prevention and cleanup.

Any/all fuel canisters and motor oil containers shall be stored in secondary containment (e.g. plastic totes or sealed metal boxes) while being stored long term or not in immediate use, wherever these materials are used anywhere on the property. 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.

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.

Domestic and commercial cannabis trash and refuse will be generated at the site. The trash/refuse is stored securely in trash bags and trash bins at the cultivation area, residences, the fertilizer storage shed, and in a repurposed dog cage to prevent scavenging wildlife from accessing the wastes prior to disposal at an appropriate waste disposal facility.

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

Trash and refuse are stored in trash bags and trash bins at the mapped cultivation area, residences, the fertilizer storage shed, and in a repurposed dog cage to the east of the cultivation area. See attached Site Map.

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

There are two regular employees who are at the site during the cultivation season. Additional employees are brought onto the property for short periods of time to complete projects requiring additional employees. Visitors are occasionally on site, including consultants and regulatory agencies. There is also a full-time residence on the property as well.

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

Domestic sewage and wastewater (greywater) are generated on site.

- 4.2.2. Describe how the domestic wastewater is disposed.

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

Domestic wastewater is disposed via a permitted septic system. Greywater from seasonally used travel trailers and outdoor sinks is disposed of nearby where it is generated and allowed to infiltrate.

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

Not applicable yet. The cannabis cultivator intends to obtain portable chemical toilets as needed during the cultivation season.

- 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.

Multiple outhouses were found on the property during the site assessment. The cannabis cultivator intends to

discontinue and remove the outhouse and obtain portable chemical toilets as needed during the cultivation season.

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

See attached Site Map for locations of residences with attached septic systems. The outhouses are not mapped but can be found to the northeast of the cultivation area and to the east of the residence located to the east of cultivation area.

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 each 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 maintained or 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.

Not applicable.

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.

Not applicable. No legacy waste discharge issues were identified during the assessment of the property.