

Site Management Plan (Summary)

Humboldt County APN 216-271-013 SWRCB App# 417812 NCRWQCB WDID# 1B16571CHUM

Submitted to: State Water Resources Control Board -North Coast Region 5550 Skylane Boulevard, Suite A Santa Rosa, California 95403

Prepared by: Natural Resources Management Corporation 1434 3rd Street Eureka, CA 95501

January 23, 2020



To Whom it May Concern,

The following document is a snap-shot summary of the current property and project conditions, based off of NRM's most recent site visit and/or client correspondence.

This summary touches on all topics required by a Site Management Plan; all of these items will be explained in greater detail when the official Site Management Plan is completed. Currently, NRM is expecting a 4-6 month completion time frame for SMPs.

If there are any items in this summary that you would like more detail on, please reach out and I would be happy to provide any and all additional information/documents we have.

Thank you for your understanding,

Alicia Heitzman

Cannabis Compliance Supervisor

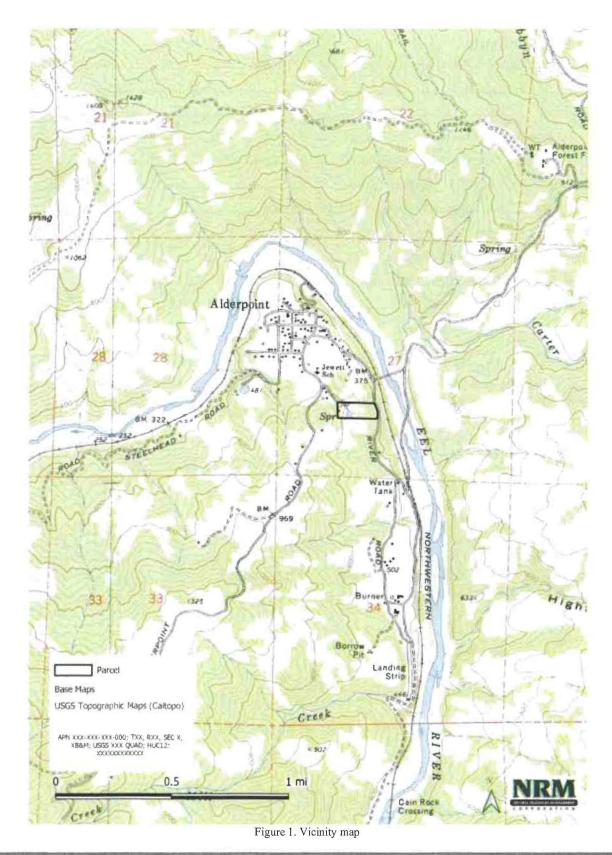
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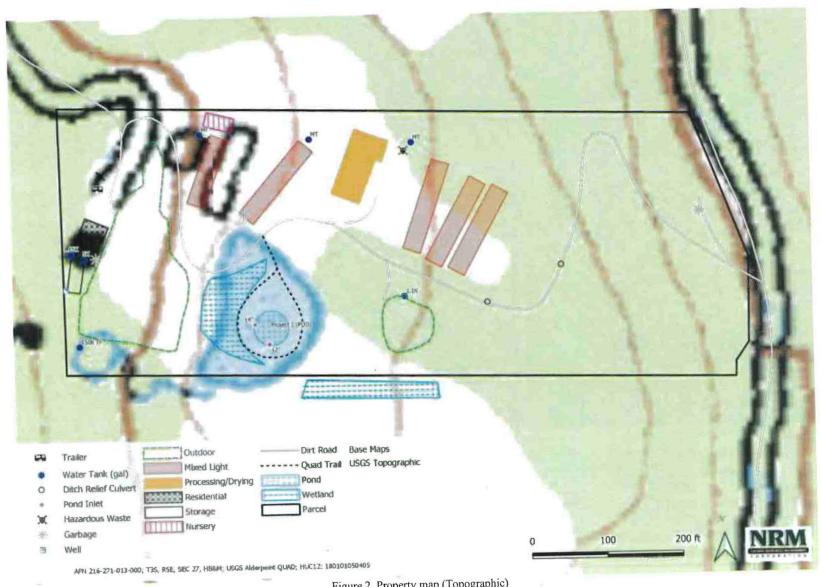


Figure 2. Property map (Topographic)



Figure 3. Property map (Google Satellite)

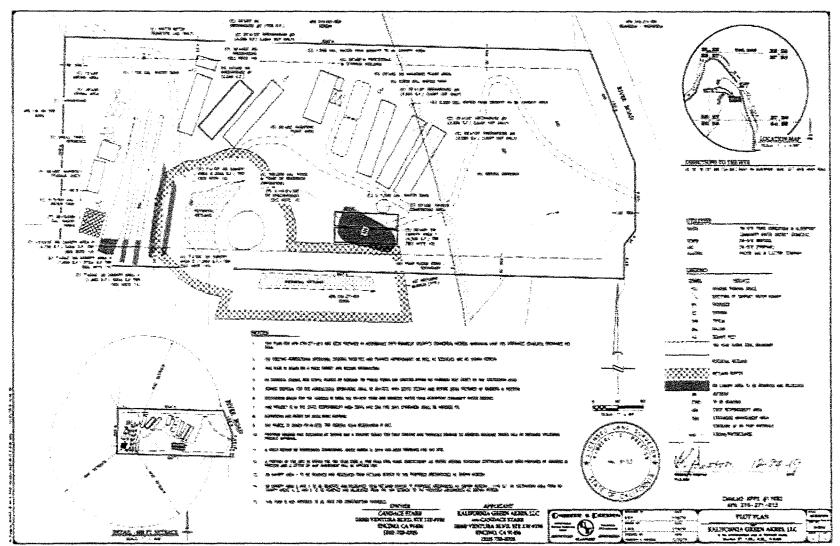


Figure 4. Plot Plan

1. Sediment Discharge BPTC Measures

1.1. Site Characteristics

Cultivation Areas

There is a total of 40,000 square feet of cultivation, which is made up of five mixed light hoop houses, two outdoor gardens, and one propagation hoop house

1.1.3 Watercourse Crossings

While there are no watercourse crossings or waterways on this parcel, there is a pond and a wetland. The pond is man-made and fed by the wetland, which is directly up-hill to the west. This wetland was delineated by NRM in 2018.

Existing LSAA 1600-2017-0672-R1 from the California Department of Fish and Wildlife covers the construction of an overflow for the pond. The associated Appendix D from the SWRCB was applied for in early 2018.



Figure 5. Wetlands and Associated Buffers

1.1.3.1 Legacy Discharge Issues

There are no legacy discharge issues on this property.

Any future grading or road work will follow the requirements listed out in Section II of Attachment A of the General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (Order WQ 2017-0023-DWQ), constructed by the State Water Resources Control Board.

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

Table 1. 2018 Fertilizer Usage

Overdrive - Advanced Nutrients	$\frac{1}{1}$	5	1100	106	55 169
Fox Farm Big Bloom	1	4	2200	22	88
Cal Mag Pure Blend	2	0	1700	34	0
Fox Farm Grow Big	3	2	1300	39	26
Product Name	N	P	Total Used (lbs)	Total N	Total P

All fertilizers and like products are self-delivered to the property and all empty containers are stored in secondary containment in the "storage/processing" building, which has a concrete floor until they are taken to be recycled. There are miscellaneous empty containers not in the proper containment around the property, these will be cleaned up as soon as possible.

3. Petroleum Product BPTC Measures

Table 2. Petroleum Product Usage

Product	Delivery	Storage	Use	Disposal
Regular Gasoline	Self Pick-Up	Building with concrete floor	Generators, pumps	Containers are reused

All petroleum products are stored in the "storage/processing" building, which has a concrete floor.

4. Trash/Refuse and Domestic Wastewater BPTC Measures

4.1 Trash and Refuse

Trash/refuse generated at this site consists of cardboard, plastic containers, and organic compostable materials. As of NRM's last site visit there was some uncontained trash around the property. Moving forward, trash and recycling will be contained in a designated area within identified receptacles, inside of the "storage/processing" building, which has a concrete floor. Plastic containers are taken as need with the garbage to a recycling facility. All trash created on site will be transported to the nearest licensed waste facility. There is a septic system in the residential building.

5. Winterization BPTC Measures

At the end of the growing season, prior to winter rains, the follow steps will be taken to prepare the site for winter:

- Any bare soil on the fill slopes on the landing will be covered with straw 2 to 3 inches thick and secured with a tackifier or describe any revegetation activities that will occur either at the beginning or end of the precipitation season. Cannabis cultivators shall apply erosion repair and control measures to the bare ground (e.g., cultivation area, access paths, etc.) to prevent discharge of sediment to waters of the state.
- Cannabis stems and root balls will be composted on-site or taken to Wes Green Landscaping in Arcata, CA
- All nutrients, fuels, and all chemicals will be placed in a secure storage shed
- All cultivation trash and debris will be properly disposed of

- Cannabis cultivators shall maintain all culverts, drop inlets, trash racks and similar devices to ensure they are not blocked by debris or sediment. The outflow of culverts shall be inspected to ensure erosion is not undermining the culvert. Culverts shall be inspected prior to the onset of fall and winter precipitation and following precipitation events that produce at least 0.5 inch/day or 1.0 inch/7 days of precipitation to determine if maintenance or cleaning is required.
- Cannabis cultivators shall block or otherwise close any temporary access roads to all motorized vehicles no later than the onset of the winter period each year.
- Cannabis cultivators shall not operate heavy equipment of any kind at the cannabis cultivation site during the winter period, unless authorized for emergency for emergency repairs contained in an enforcement order issued by the State Water Board, Regional Water Board, or other agency having jurisdiction

If any BPTC measure cannot be completed before the onset of winter period, the landowner will contact the Regional Water Board to establish a compliance schedule.

As stated by the Water Code section 13267 the landowner will complete and submit technical monitoring reports monthly until winterization measures have been implemented.

6. Water Use and Storage BPTC Measures

Table 3. Estimated 2019 Irrigation Water Usage

Irrigation	January	February	March	April	May	June	July	August	September	October	November	December
Direct Diversion	0	0	0	0	0	0	0	0	0	0	0	0
To Storage	50,000	50,000	50,000	0	0	0	0	0	0	0	50,000	50,000
From Storage	0	0	0	10K	20K	40K	60K	60K	40K	20K	0	0

Table 4. 2018 Monthly Domestic Water Usage

Domestic	January	February	March	April	May	June	July	August	September	October	November	December
Direct Diversion	100	100	100	100	100	100	100	100	100	100	100	100
To Storage	0	0	0	0	0	0	0	0	0	0	0	0
From Storage	0	0	0	0	0	0	0	0	0	0	0	0

Water for irrigation started being sourced from the pond in 2019 (LSAA 1600-2017-0672-R1 / SIUR Registration H508632) and domestic water is sourced from Alderpoint Municipal. Water is diverted from the pond into the 150,000 gallons of storage located in the south western corner of the property.

For continued future compliance, water meters will be used to quantify both direct diversion and diversion to storage. A photo of the meter reading will be taken weekly to document water use.

7. Summary of Corrective Actions and Monitoring

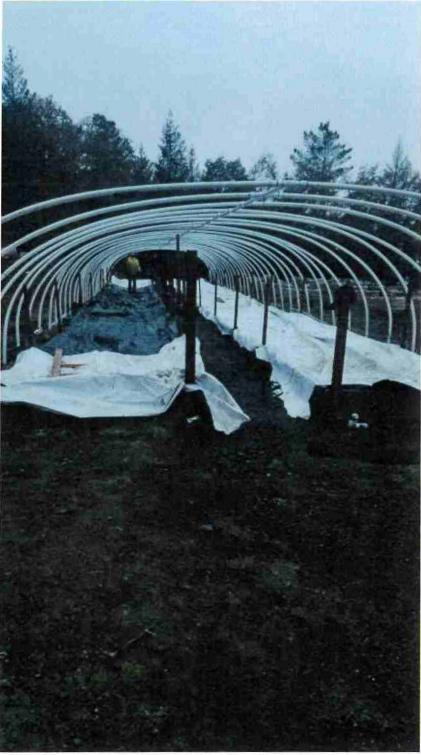


Figure 6. Corrective Actions

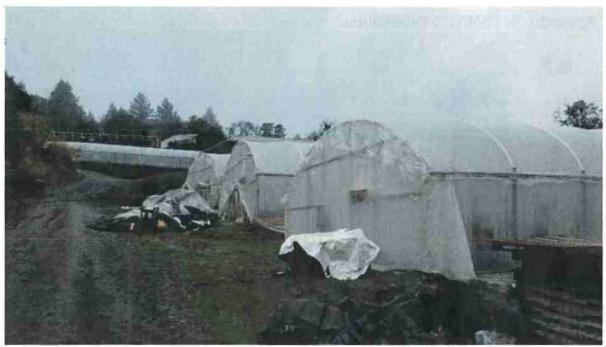
Table 5. Corrective Actions Required

Corrective Action	Action Description Water Storage		Permanent BMP (Best Management Practices)	Time Schedule for Final Completion		
L			BMP (Best Management Practices) n/a Install water meters			
2	Hazardous Waste	n/a	Store all fertilizers/empty containers in secondary containment	February 2020		
3	Trash Pond Outlet		3 Trash		n/a Store all trash in secondary containment, haul off property	
4			Construct outlet spillway for pond	July 2020		

Appendix A. Photo Documentation



Raised beds prepped for winter – 12/10/2018



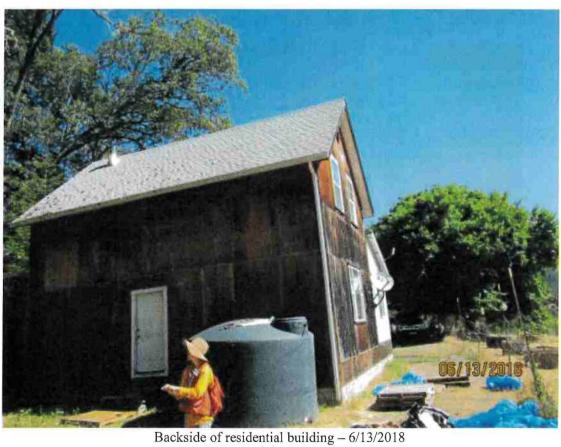
Property prepped for winter - 12/10/2018

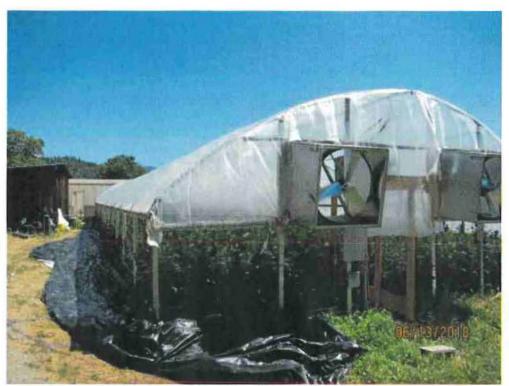


Looking down at pond from western outdoor garden - 3/18/2019

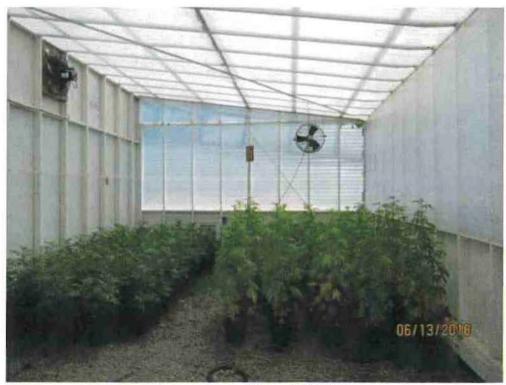


Looking up at western outdoor garden – 3/18/2019

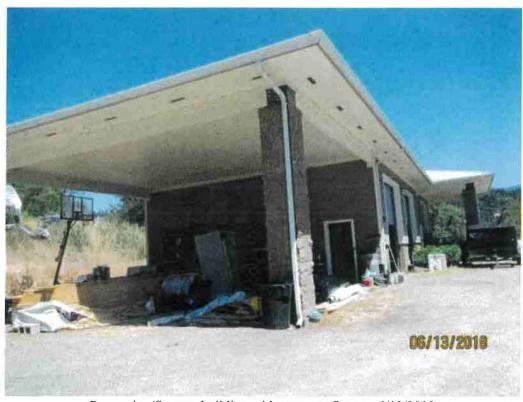




Western-most hoop house - 6/13/2018



Propagation building - 6/13/2018



Processing/Storage building with concrete floors – 6/13/2018



Eastern outdoor garden - 6/13/2018