
North Coast Regional Water Quality Control Board

December 11, 2018

Mr. Steven Westbrook
PO Box 75
Smith River, CA 95567
ReservationRanchSteven@gmail.com

Dear Mr. Westbrook:

Subject: Notice of Violation and California Water Code Section 13267 Order for Technical Reports

File: Reservation Ranch; WDID No. 1B11125DDN; CIWQS PIN CW-775497

As the Assistant Executive Officer for the North Coast Regional Water Quality Control Board (Regional Water Board), I am sending you, co-owner and manager of Reservation Ranch in Del Norte County, this requirement for technical documents pursuant to California Water Code (Water Code) section 13267 (2018 Order). Issuance of this 2018 Order is based on information available to Regional Water Board staff showing that Reservation Ranch is responsible for unlawful discharges of waste into waters of the state¹ and violations of the *Conditional Waiver of Waste Discharge Requirements, Order No. R1-2012-0003 for Existing Cow Dairies in the North Coast Region* (Conditional Waiver). This 2018 Order requires Reservation Ranch to produce information related to historical operations at Reservation Ranch, which has been owned and operated by the Westbrook family since 1930.

On January 9, 2017, the Regional Water Board issued a separate 13267 Order (2017 Order) to you requiring information about Islas Slough fill activities, trash and cow disposal areas, dredging within Tillas Slough, and levee construction. The 2017 Order was issued after Regional Water Board staff conducted a September 21, 2016, inspection of property owned by Reservation Ranch, Del Norte County Parcels 103-010-01 and 103-010-02, and observed unpermitted discharges of waste, including dredge or fill material, into waters of the state and United States (U.S.) in violation of the Conditional Waiver and federal Clean Water Act (Clean Water Act) sections 301, 401, and 404. Regional Water Board staff have

¹ "Waters of the state" means "any surface water or groundwater, including saline waters, within the boundaries of the state." (Wat. Code, § 13050(e).) All "waters of the United States" in California are waters of the state. (See 33 C.F.R. § 328.3 (defining "waters of the United States," including wetlands for permitting decisions under federal Clean Water Act section 404).)

obtained new information indicating additional unpermitted discharges of fill material into waters of the state and U.S. within property owned and operated by Reservation Ranch, Del Norte County Parcels 103-010-001-000, 102-010-049-000, 102-010-050-000, 103-010-012-000, and 103-010-002-000, which is the basis for this 2018 Order.

Review of historical imagery indicates the following:

- A crossing was built across an unnamed tributary to the Smith River, a water of the U.S., at approximate latitude/longitude 41.941057, -124.195466. The crossing is labeled Crossing 1 as shown in Figure 1, attached hereto and incorporated by reference. The Regional Water Board does not have record of any Clean Water Act section 401 water quality certifications or Waste Discharge Requirements (WDRs) issued for construction or maintenance of Crossing 1. The Regional Water Board does not have any information for the Crossing 1 construction date, design, and to what extent the design may be affecting beneficial uses² of the unnamed drainage.
- A crossing was built across the main fork of Tillas Slough³, a water of the U.S., at Crossing 2 as shown in Figure 1. The Regional Water Board does not have record of any Clean Water Act section 401 water quality certifications or WDRs issued for construction or maintenance of Crossing 2. The Regional Water Board does not have any information for the Crossing 2 construction date, design, and to what extent the design may be affecting beneficial uses of Tillas Slough.
- Three crossings were built across the east fork of Tillas Slough,⁴ a water of the U.S., at Crossings 3-5 as shown in Figure 1. The Regional Water Board does not have record of any Clean Water Act section 401 water quality certifications or WDRs issued for construction or maintenance of Crossings 3-5. The Regional Water Board does not have any information on the crossing construction dates, crossing designs, and to what extent the crossings may be affecting beneficial uses of the east fork of Tillas Slough.
- A crossing was built across the west fork⁵ of Tillas Slough, a water of the U.S., at Crossing 6 as shown in Figure 1. The Regional Water Board does not have a record of any Clean Water Act section 401 water quality certifications or WDRs issued for construction or maintenance of Crossing 6. The Regional Water Board also does not

² Existing and potential beneficial uses of the Smith River watershed are identified in the Water Quality Control Plan for the North Coast Region (Basin Plan).

³ For purposes of this Order, the "main fork of Tillas Slough" refers to the water body segment between the confluence of Tillas Slough and the Smith River, at approximate latitude/longitude 41.938600, -124.196262, and the confluence of the east and west forks of Tillas Slough, at approximate latitude/longitude 41.933966, -124.192388.

⁴ For purposes of this Order, the "east fork of Tillas Slough" refers to the water body segment between the confluence of east and west fork Tillas Slough, at approximate latitude/longitude 41.933966, -124.192388, at the downstream extent, and terminating upstream at the location labeled "Upper Tillas Pump," as shown on Figure 2, at approximate latitude/longitude 41.919965, -124.177942.

⁵ For purposes of this Order, "west fork of Tillas Slough" refers to the water body segment between the confluence of east and west fork Tillas Slough, at approximate latitude/longitude 41.933966, -124.192388, at the downstream extent, and terminating upstream at approximate latitude/longitude 41.922972, -124.187032.

have any information for the Crossing 6 construction date, design, and to what extent the design may be affecting beneficial uses of the west fork of Tillas Slough.

- Construction of a new road, reconstruction and widening of an existing road, removal of riparian vegetation, and straightening of an unnamed tributary to the west fork of Tillas Slough and waters of the U.S. has occurred just east of the west fork of Tillas Slough, in the area shown in Figure 3, attached hereto and incorporated by reference. It is apparent in the Figure 3 images that a sinuous and braided channel with riparian vegetation was replaced with a straight roadside ditch at some time between 1988 and 1992. The Regional Water Board does not have a record of any Clean Water Act section 401 water quality certifications or WDRs issued for these activities, does not know the exact construction date, and does not have sufficient information to determine the extent of impacts to the unnamed water of the state.
- Four pump stations are identified within Reservation Ranch, one on the Smith River, and three along the east fork of Tillas Slough (see pump station locations on Figure 2, attached hereto and incorporated by reference). Figure 2 shows the location of four pumps that appear to move freshwater in and out of Tillas Slough. The operational details of the Reservation Ranch irrigation system, including freshwater pumping and storage is needed to understand the movement of water into and out of Tillas Slough, as well as the scope of impacts to Tillas Slough beneficial uses.

Additionally, this 2018 Order is based on the following findings:

- Steven Westbrook indicated to Regional Water Board staff during the September 21, 2016 inspection that Reservation Ranch impounds freshwater behind crossings on the east fork of Tillas Slough.⁶ Freshwater storage in the east fork of Tillas Slough appears to occur during the summer months.⁷ The crossings and associated freshwater impoundment within the east fork of Tillas Slough has altered its natural estuarine hydrology by eliminating tidal inflow. Changes to abiotic estuarine conditions from excluded or altered tidal circulation include increased salinity, increased temperature, and reduced dissolved oxygen, and will affect fish and other aquatic estuarine organisms as they are forced to either adapt to the altered environmental conditions or relocate.⁸ Complete blockage of tidal flow will exclude estuarine species from utilizing potential habitat upstream of the tidal blockage.

⁶ Blatt, C., Thompson, B., November 14, 2016. North Coast Regional Water Quality Control Board, Reservation Ranch Inspection.

⁷ Parish, M. and J. Garwood. 2015. Distribution of Juvenile Salmonids and Seasonally Available Aquatic Habitats within the Lower Smith River Basin and Estuary, Del Norte County, California. Final Report to the California Department of Fish and Wildlife, Fisheries Grants Restoration Program, Contract: P1310518. Smith River Alliance, Crescent City, CA. 62p.

⁸ Parthree, D. 2004. Fish and invertebrate ecology of Tillas and Islas Sloughs, Smith River estuary, Del Norte County, California. [Thesis] Humboldt State University, Arcata, CA. 113p.

- Reed canarygrass (*Phalaris arundinacea*) is a rhizomatous grass that tends to form dense monotypic stands that can overcome small watercourses.⁹ A 2015 California Department of Fish and Wildlife (CDFW) report indicates that reed canarygrass has colonized the entire length of the east fork of Tillas Slough upstream of Crossing 3 (see Figure 4).⁶ In response to the 2017 Order, Steven Westbrook noted that a portion of the east fork of Tillas Slough was dredged to remove reed canarygrass. Reed canarygrass thrives in wet freshwater conditions, and while it may tolerate waters with low salinity, it cannot withstand high saline waters.¹⁰ The abrupt transition from a reed canarygrass-free channel downstream of Crossing 3 to a reed canarygrass-infested channel upstream of Crossing 3 suggests that salinity concentrations on either side of the crossing have differed significantly over time as a result of freshwater storage practices upstream of Crossing 3.
- Approximately 1.3 miles of waters of the U.S.¹¹ within the main stem, east fork, and west fork of Tillas Slough are excluded from access by aquatic species at times when tidal flows are prevented from passing through Crossing 3. Tillas Slough is critical habitat for the federally endangered tidewater goby (*Eucyclogobius newberryi*) and is the furthest northern extent of the tidewater goby's range.¹² Tillas Slough also provides salmonid habitat for Chinook salmon (*Oncorhynchus tshawytscha*), cutthroat trout (*O. clarki*), steelhead trout (*O. mykiss*) and the federally threatened population of Southern Oregon/Northern California Coast (SONCC) coho salmon (*O. kisutch*). The National Marine Fisheries Service's SONCC Salmon Recovery Plan identifies the Smith River population of coho salmon as "high extinction risk" and identifies impaired estuary function as a "very high" stress factor for coho salmon juveniles and smolts and a medium stress factor for coho salmon fry and adults.¹³
- Approximately 2.8 miles of waters of the U.S. within the main stem, east fork, and west fork of Tillas Slough are excluded from contact and non-contact recreational opportunities due to the placement of the main stem Tillas Slough crossing (Crossing 1, Figure 1), which acts as a complete access barrier to all waters of the U.S. upstream of the crossing. If the main stem crossing were removed, approximately 1.3 miles of the east fork of Tillas Slough would still be excluded from recreational activities due to the presence of Crossings 3, 4, and 5.

⁹ DiTomaso, J.M., G.B. Kyser et al. 2013. *Weed Control in Natural Areas in the Western United States Weed Research and Information Center*, University of California. 544 pp.

¹⁰ Waggy, Melissa, A. 2010. *Phalaris arundinacea*. In: Fire Effects Information System, [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory (Producer). Available: <https://www.fs.fed.us/database/feis/plants/graminoid/phaaru/all.html> [2018, November 20]

¹¹ Distance estimates in this paragraph and the next determined using Google Earth linear measuring tool.

¹² Federal Register, Vol. 78, No. 25, January 25, 2013.

¹³ National Marine Fisheries Service (NMFS). 2014. Final Recovery Plan for the Southern Oregon/Northern California Coast Evolutionarily Significant Unit of Coho Salmon (*Oncorhynchus kisutch*). National Marine Fisheries Service. Arcata, CA. 1841p.

- The change to the natural hydrology of Tillas Slough has likely impacted its beneficial uses, including estuarine habitat (EST), water contact recreation (REC-1), non-contact water recreation (REC-2), cold freshwater habitat (COLD), migration of aquatic organisms (MIGR), and spawning, reproduction, and/or early development (SPWN).¹⁴

Violations

Review of historical imagery shows that crossings were built across the main stem, east fork, and west fork of Tillas Slough, and an unnamed tributary to the Smith River at Crossings 1-6, as shown on Figure 1. Crossings consist of earthen and man-made culvert materials. Also, Reservation Ranch has imported and stored fresh water within estuarine waters of the U.S. This liquid and these materials are defined as “waste” under California Water Code (Water Code) section 13050.

Under Water Code section 13376, a person who discharges pollutants or dredged or fill material to waters of the U.S. in the North Coast Region shall file a report of waste discharge pursuant to Water Code section 13260. Moreover, any person who discharges dredged or fill material to waters of the U.S., including wetlands, must obtain a federal Clean Water Act (Clean Water Act) section 404 permit from the U.S. Army Corps of Engineers, and Clean Water Act section 401 water quality certification from the Regional Water Board. Unpermitted discharges of pollutants or dredged or fill materials to waters of the U.S. are violations of Clean Water Act section 301, subdivision (a).

The Regional Water Board has no evidence that Reservation Ranch obtained any permits or water quality certification for the discharges discussed in this 2018 Order. Violations of Water Code section 13376 and Clean Water Act section 301 are subject to penalties under Water Code section 13385, subdivision (c), authorizing the Regional Water Board to impose an administrative civil liability of up to ten thousand dollars (\$10,000) per violation per day and ten dollars (\$10) per gallon discharged and not cleaned up in excess of 1,000 gallons.

The Regional Water Board’s Conditional Waiver of Waste Discharge Requirements Order No. R1-2012-0003 includes the following prohibitions:

22. The collection, treatment, storage, discharge, or disposal of wastes at an existing dairy that results in (1) discharge of waste constituents in a manner which could cause degradation of surface water or groundwater except as allowed by this Order, (2) contamination or pollution of surface water or groundwater, (3) a condition of nuisance (as defined by the California Water Code Section 13050), or

¹⁴ The beneficial uses of Tillas Slough and the Smith River Plain are listed and described in Chapter 2 of the *Water Quality Control Plan for the North Coast Region* (Basin Plan). The Basin Plan can be accessed on the Regional Water Board website, at https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/basin_plan_documents/

(4) exceedance of groundwater and surface water quality objectives due to the discharge of manure, production area wash water, or dairy feeding and housing area wash water, is prohibited.

23. Discharges of manure, process water, or other wastes to surface waters or groundwater, or discharges that do not comply with the requirements in this Order are prohibited.

Reservation Ranch is in violation of Conditional Waiver Prohibitions 22 and 24 for discharges of waste to waters of the U.S.¹⁵ The unpermitted discharges of earthen material and manmade materials associated with crossings as well as freshwater within waters of the U.S. violate Prohibitions 22 and 24. Any person who, in violation of a waiver condition or other order or prohibition issued by the Regional Water Board, discharges waste, or causes to permit waste to be deposited where it is to be discharged, into waters of the state is subject to penalties under Water Code section 13350, subdivision (e), authorizing the Regional Water Board to impose an administrative civil liability of up to \$5,000 per violation per day or \$10 per gallon of waste discharged.

Required Information

The Regional Water Board may investigate the quality of waters of the state within the North Coast Region. Water Code section 13267, subdivision (b)(1) states, in part:

In conducting an investigation . . . , the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region . . . shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports and shall identify the evidence that supports requiring that person to provide the reports.

For the reasons explained above, you, Steven Westbrook, as co-owner and manager of Reservation Ranch, has discharged, discharges, or is suspected of having discharged waste and/or fill into waters of the state within the North Coast Region.

The burdens, including costs, of the report required in this 13267 Order bears a reasonable relationship to the need for the report and the benefits to be obtained from the report. The report is required to obtain information that is necessary to: fully delineate the extent of actual and potential adverse impacts to water quality and beneficial uses caused by the

¹⁵ A copy of the Conditional Waiver, which includes the text of all Prohibitions, is available at: http://www.waterboards.ca.gov/northcoast/water_issues/programs/dairies/pdf/120127/waiver/120127_12_0003_Waiver_Dairy.pdf

unauthorized discharges; determine compliance with the Conditional Waiver and water quality objectives and prohibitions in the Basin Plan; and identify corrective actions, including the scope of restoration of surface waters and wetlands. The cost bears a reasonable relationship to the benefits because of the widespread potential for harm to beneficial uses that these historic unauthorized discharges have caused.

Pursuant to Water Code section 13267, you are hereby ordered to submit a technical report containing the following information by **April 10, 2019**:

1. Water Crossing Description Report

Provide the following information for each of the crossings, including tide gates, for Crossings 1-6¹⁶ as identified in Figure 1:

- A) Date of installation;
- B) Design of crossing at time of installation, including materials, material volumes, culvert types and dimensions, and tide gate types and dimensions. Include a description of the methodology used to calculate volume;
- C) Description and dates of all post-installation alterations to the crossing and tide gate(s), including maintenance, repairs, and alterations. Describe materials, material volumes, culvert types and dimensions, and tide gate types and dimensions. Include a description of the methodology used to calculate volume;
- D) Assessment of current condition of the crossings and tide gate(s), including structural condition, operational condition, dimensions, and tide gate condition;
- E) Photographs of the crossing, showing upstream, downstream, and side perspectives; and
- F) Copies of all permits and authorizations issued from the Regional Water Board, California Department of Fish and Wildlife, California Coastal Commission, United States Army Corps of Engineers, and the State Lands Commission.

2. Hydrology, Water Storage, and Pump Operations Report

Provide the following information to explain how water is imported, collected, and stored within the east fork of Tillas Slough. Information provided shall account for seasonal variations in climate and ranch operations:

- A) All pump sizes, types, fish screen descriptions, purposes, frequency and times of operation, and date of installation, for each of the pumps shown in Figure 2;
- B) Explain how and where Tillas Slough is used to store water, for each part of Tillas Slough, including the portion of the east fork of Tillas Slough, south of Crossing 5 as shown in Figure 1. Include a description of tide

¹⁶ Based upon review of aerial imagery, it appears that Crossing 6 is no longer a functional crossing. Nonetheless, this 2018 Order requires production of the applicable information as listed in this item because fill materials may still be present within waters of the U.S.

gate operations, and a description of any other activities that restrict tidal flow through the crossing;

- C) Copies of all permits and authorizations issued for pump installation and use, and storage of fresh water, including, but not limited to, permits from the CDFW, California Coastal Commission, State Lands Commission, and the California State Division of Water Rights.

3. Road Development Report

Historical imagery indicates that the roadway segment shown on Figure 3 was constructed and redeveloped between 1988 and 1992. Provide the following details for this roadway segment:

- A) Date(s) of roadway development;
- B) Copies of all permits and authorizations issued for roadway construction activities from the Regional Water Board, CDFW, California Coastal Commission, State Lands Commission, and United States Army Corps of Engineers;
- C) Representative photographs for the entire roadway segment and adjacent roadside drainage, including a map with photo points;
- D) Linear feet and area of riparian vegetation impacted as a result of roadway construction and redevelopment, and as a result of pasture expansion adjacent to the roadway. A description of the methodology used to calculate area of riparian vegetation impacted shall be provided;
- E) Linear feet of unnamed waters of the U.S., as shown on Figure 3, realigned as a result of roadway construction and roadway redevelopment, and as a result of pasture expansion adjacent the roadway; and
- F) Area of unnamed waters of the U.S., as shown on Figure 3, filled as a result of roadway construction and redevelopment, and as a result of pasture expansion adjacent to the roadway. A description of wetland fill area calculation methodology shall be provided.

You shall provide documentation that the technical reports required in this 2018 Order were prepared under the direction of appropriately qualified professional(s). In preparing the technical report required by this 2018 Order, any scientific, engineering or geologic evaluations and judgements must be performed by or under the direction of registered professionals pursuant to California Business and Professions Code sections 6735, 7835, and 7835.1. A statement of qualifications and registration numbers of the responsible lead professional shall be included in the submitted report. The lead professional shall sign and affix his or her registration stamp to the report.

Any report submitted in response to this Order shall include the following perjury statement:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of

the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The technical reports required in items 1-3 shall be timely submitted electronically to:

Mr. Joshua Curtis
Assistant Executive Officer
North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403
Email: NorthCoast@waterboards.ca.gov

Any modification to this 2018 Order shall be in writing and approved by the Assistant Executive Officer, including any potential deadline extensions. If you are unable to perform any activity or submit any document in compliance with the schedule set forth herein, you may request, in writing, an extension of the time specified. The written extension request shall include justification(s) for the delay and shall be submitted to the Assistant Executive Officer at least 30 days prior to the deadline that you are requesting to extend. The Assistant Executive Officer may grant an extension in writing for good cause.

Failure to submit complete and timely technical and monitoring reports required in this 2018 Order will subject you to further enforcement action by the Regional Water Board. Pursuant to Water Code section 13268, any person failing or refusing to furnish technical or monitoring program reports required under Water Code section 13267, or falsifying any information provided therein, is guilty of a misdemeanor and subject to an administrative civil liability of up to one thousand dollars (\$1,000) for each day in which the violation occurs. The Regional Water Board reserves its right to take any enforcement action as authorized by law.

Any person affected by the technical and monitoring report requirements provided above may petition the State Water Resources Control Board (State Water Board) to review those requirements in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 pm, 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions will be provided on request or may be found on the Internet at:

https://www.waterboards.ca.gov/public_notices/petitions/water_quality/index.shtml

If you have any questions on this matter, please contact Brendan Thompson at (707) 576-2699 or via e-mail at Brendan.Thompson@waterboards.ca.gov.

Sincerely,

Joshua Curtis
Assistant Executive Officer

181211_BJT_er_ReservationRanch_13267.asd

Attachments: Figures 1-4

Certified – Return Receipt Requested

CC list:

Holly Costa, U.S. Army Corps of Engineers (USACE), Holly.N.Costa@usace.army.mil

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Patrick Veasart, CCC, Pat.Veasart@coastal.ca.gov

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Marlene Schroeder, State Lands Commission, Marlene.Schroeder@slc.ca.gov

FIGURES



Figure 1: Reservation Ranch crossings. Photo source: Google Earth. Imagery Date 7/2/2016.



Figure 2: Reservation Ranch Pump Map. Image courtesy of California Department of Fish and Wildlife (received August 24, 2017)



Figure 3: Construction of a new road, including a crossing over the east fork of Tillas Slough, reconstruction of an existing road, removal of riparian vegetation, and straightening of unnamed state waters appears to have occurred in the area between the yellow and blue arrows, between 1988 and 1992. Removal of riparian vegetation and straightening of unnamed state waters occurred in the area that lies between the orange and blue arrows.

1988 photo source: California Department of Forestry, United States Department of Forestry. (CDF, USDA) Image capture date: March 30, 1988.

1992 photo source: WAC Corporation. Image capture date: March 31, 1992

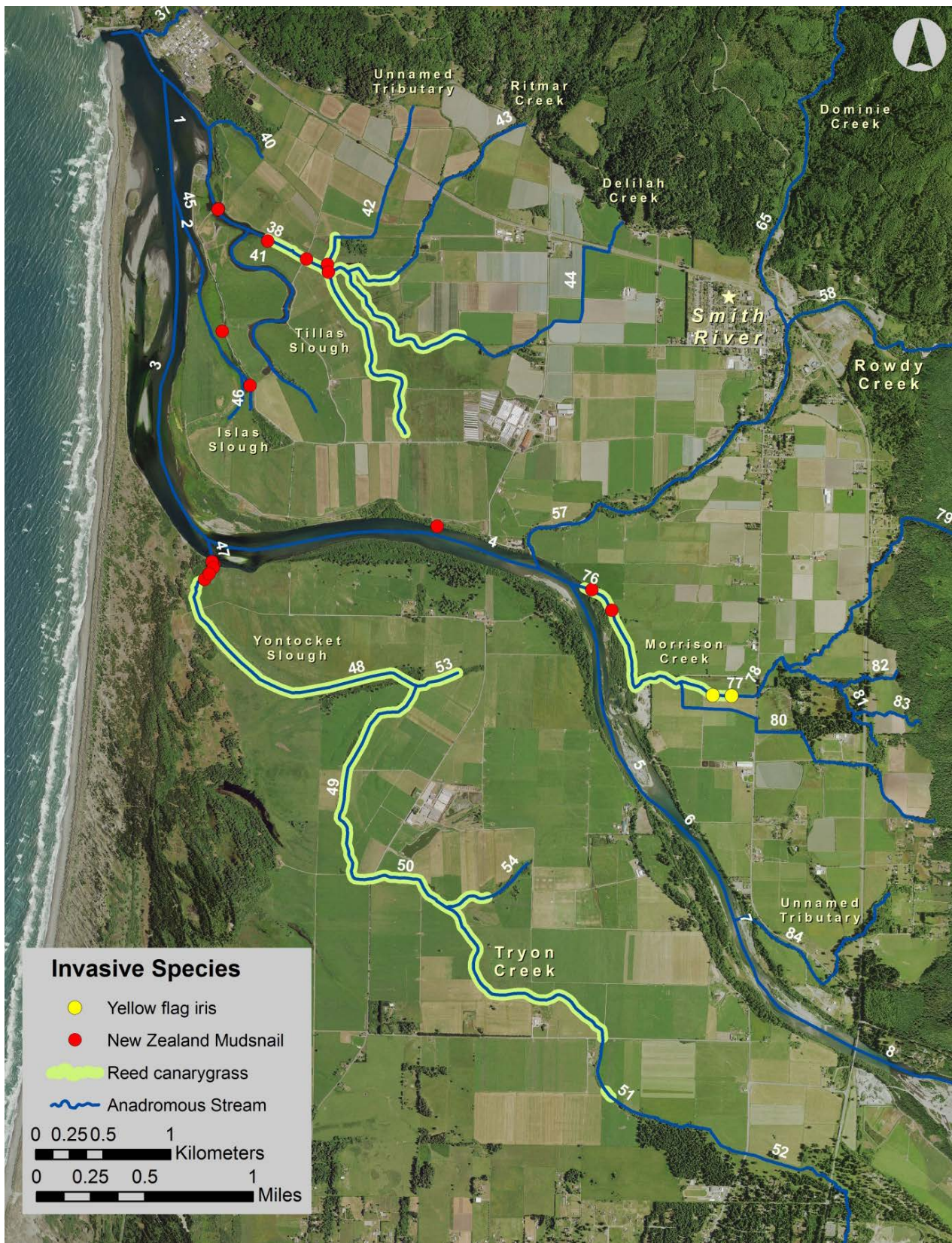


Figure 4: Distribution of invasive flora and fauna cataloged during salmonid distribution surveys occurring in the summer of 2014 and winter of 2015, Smith River Basin, Del Norte County, California. Note: mapped distributions are not complete but based on our sampling locations defined in Figures three and four. Reach location codes are labeled in white. Figure taken from CDFW report, see Footnote 6 for report reference.