
North Coast Regional Water Quality Control Board

June 27, 2017

Mr. Douglas Cole et. al.
92520 Highway 96
Somes Bar, CA 95568
guestranch@marblemountainranch.com

Dear Douglas and Heidi Cole:

Subject: **Notice of Violation No. 3 of Order No. R1-2016-0031** and Response to Your April 10, 2017, letter Regarding Proposed Time Schedule and March 17, 2017, Notice of Violation No. 2

File: Douglas and Heidi Cole, Marble Mountain Ranch, 92520 Highway 96, Somes Bar, Siskiyou County APN 026-290-200, Klamath River Watershed WDID No. 1A15024NSI

The purpose of this letter is to let you know that you remain in violation of the Cleanup and Abatement and California Water Code section 13267 Order No. R1-2016-0031 by the North Coast Regional Water Quality Control Board (Order), and to respond to your letter, dated April 10, 2017, proposing a "time schedule to complete some of the projects outlined in the State Water Resources Control Board's ("State Water Board") Draft Order WR 2017-00XX-DWR ("Draft Order"), and the North Coast Regional Water Quality Control Board's ("Regional Water Board") Order. This response focuses on the Regional Water Board's Order requirements, those you have addressed, failed to address, and delayed addressing, and concludes with a brief discussion of the report provided by Fiore Geosciences.

In your letter, dated April 10, 2017, you request an update or response to the letter submitted to the Regional Water Board on February 8, 2017. We previously responded to this letter. For our response, please see Attachment A. The next part of your April 10, 2017, correspondence is your position on meeting or declining to meet Regional Water Board's Order directives. The next part of your April 10, 2017, correspondence, Exhibit A, is the Fiori Geoscience Report developed by Rocco Fiore for Marble Mountain Ranch. The last part of the your April 10, 2017,

correspondence, Exhibit C, is a proposal from ECORP Consulting to address issues related to the Irving Creek outfall. As we address your concerns regarding the Regional Water Board's Order directives and Notice of Violations No. 2 dated March 17, 2017, we will also address continuing violations of the Order, as necessary, to impress upon you the necessity of your compliance in these proceedings.

To start, we will clarify which Order Directives remain as outstanding deliverables at this time based upon the information submitted.

Violations of Order Directives

Order Directive No. 1

Directive No. 1 remains in effect and requires compliance to address the scope of the issues relevant to the Order. As of June 16, 2017, **Marble Mountain Ranch is 244 days late in complying with Directive No. 1. No extension is granted.** Directive No. 1 states:

1. *Retain an appropriately licensed and experienced California Licensed Professional(s) to evaluate, and provide recommendations on the following:*

Evaluate the operation of the Pelton wheel to determine if there are methods of diversion operation that would increase efficiency and reduce the required volume of the diversion, such as piping the diversion flow for example. Provide a report including recommendations based upon this evaluation. The evaluation shall consider the following:

- a. *Water balance – in vs. out;*
- b. *Water quality review – in vs. out;*
- c. *Review onsite water needs and usage, and hydropower generation;*
- d. *Review opportunities to optimize water needs and usage for power generation;*
- e. *Review opportunities to reduce water loss or head loss; and*
- f. *Design a delivery system that optimizes water conservation.*

*In the event that this evaluation concludes that a piped delivery system is appropriate, develop a plan to decommission the ditch by removing the outboard berm and restoring all affected watercourses. In addition, provide design standards for slope restoration and outsloping to ensure evenly distributed surface flows. All bare soils shall be stabilized with erosion controls and replanted with native vegetation. **Submit all information and recommendations as described above on or before 5:00 pm October 15, 2016.***

You request to forego compliance with Directive No. 1. You contend that the requirement to provide a water and energy use efficiency report is unnecessary as your water right allows you to divert, as long as the diverted flows are all put to beneficial use, which you contend is being accomplished; therefore, no report on efficiency of energy and water use is required. This position basically, steps back from previous correspondence, and

discussions regarding reaching compliance with Order requirements. We reiterate our previous NOV: You have known of this requirement since December 3, 2015, and on your own volition, indicated you would provide the information by July of 2016. In previous correspondence, and in meetings, you repeatedly assured staff of the Region Water Board and the Division of Water Rights that you were working on complying with these requirements. In terms of designing an efficient process for the operation of the diversion and ensuring all waters are put to beneficial use, this should be the first priority for you to complete.

The use of water for hydropower is the primary component of the water use that likely can be adjusted to increase efficiencies. Analyzing the use of water for hydropower is necessary to allow a full analysis of alternatives available to reach a conclusion to the violations of the Porter Cologne Water Quality Control Act. Efficiencies can benefit water quality in terms of both effectively minimizing or preventing discharges from the outfall at Irving Creek; operationally preventing and minimizing water and sediment discharges through ditch operation and maintenance; and through identifying the most effective method of diverting flows to ensure beneficial uses of water are protected from thermal and sediment impacts. Whether you are complying with the Porter Cologne Water Quality Control Act is a separate issue from whether you are lawfully diverting and using water under a valid claim of right. Our authority is limited to implementing the federal Clean Water Act, Porter Cologne Water Quality Control Act and the Water Quality Control Plan for the North Coast Region (Basin Plan¹). This authority is premised upon regulating waste discharges to address the preservation, enhancement, and restoration of beneficial uses² in the interest of the public. The authority includes identifying areas where those beneficial uses are susceptible to harm and the mechanism causing harm or potentially causing harm.

The record shows the existing use of this water right as an out of basin transfer, potentially jeopardizing rearing habitat for Coho salmon and other salmonid species in the Klamath River at the mouth of Stanshaw Creek; wherein lies a documented pool providing summer refugia from thermal inclines capable of causing mortality in young of the year. Some of the relevant Beneficial Uses of the Klamath River include Cold Fresh Water, Commercial and Sport Fishing; Spawning, Reproduction and/or Early Development; Rare, Threatened or Endangered Species; Migration of Aquatic Organisms; there are many others as well. In this case, we find evidence in the record that the flows of Stanshaw Creek, likely can, and likely do, have a positive effect upon the rearing habitat of salmonids during the hot weather periods influencing salmonids mortality and survival in the Klamath Basin. As you may be aware, a Karuk Tribal representative reported a fish kill in 2009 during routine sampling. The dead fish were found in the off channel pond fed by Stanshaw Creek. The Tribal representative documented the mortality with photos and found five steelhead and one Coho salmon deceased. The Karuk Tribal representative attributed the mortality to the operation of the Stanshaw Creek diversion through depleting flows into the off channel

¹ http://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/basin_plan.shtml (Basin Plan Link)

² Water Code Division 1 Chapter 1, section §§100, 100.5, 106.7, Division 7, Chapter 1, §§13000, 13001

pool reducing the off channel pool's volume, resulting in temperature shock to the fish (see Attachment B – 2015-01-28 Email from TSoto to Sanderson fish kill).

Ross Taylor and Associates prepared a report in January of 2015 for the Karuk Tribe, "Findings Report for Stanshaw Creek Habitat and Instream flow Assessment" (Attachment C). This report clearly finds that flows from Stanshaw Creek have a positive effect upon the Stanshaw Creek pool and resident fisheries within the creek and attributes multiple stressors to the operation of the Marble Mountain Ranch diversion. These stressors include loss of benthic macro-invertebrate production and habitat, loss of habitat for resident trout, loss of habitat at the Stanshaw Creek outlet pool, and potential increased temperatures due to operation of the diversion in both the Stanshaw Creek outlet pool and Irving Creek where Stanshaw Creek is diverted to after holding in a pond. These findings translate to potentially less food for fish, less space or cover area for fish, less pool volume for fish, higher water temperatures for fish. Separately or additively, these stressors can adversely affect salmonid spawning, early development, rearing, migration and survival. Of note is that the outlet of Stanshaw Creek into the Klamath River has been the site of instream restoration efforts, as demonstrated by the Stanshaw Creek Coho Habitat Enhancement Project, March 31, 2014 (Attachment D).

The August 3, 2016, letter from the National Oceanic and Atmospheric Administration identifies the importance of Stanshaw Creek outflows for Coho Salmon, a beneficial use of water, and primary consideration in the Klamath Basin; going so far as to identify acceptable bypass flows to guide the operation of the Marble Mountain Ranch Stanshaw Creek diversion, and further requiring that those flows diverted, once used, be returned to the stream of origin to ensure adequate cold water refugia (Attachment E).

The Klamath River Total Maximum Daily Load additionally points out the importance of the Stanshaw Creek cold water resource as a source of refugia for salmonids, by specifically identifying the Stanshaw Creek outflow pool as a source of cold water refugia (Attachment F). The North Coast Region's Policy for the Implementation of the Water Quality Objectives for Temperature and the objective, as stated in Resolution No. R1-2014-0006 (Attachment G, and G-1) further supports the management of temperature through enforcement and permitting as well as through multi agency assessment and collaboration. The Basin Plan Temperature Objective requires Regional Water Board staff to address activities that result in diversion of cold water from natural applications especially wherein the cold water resource is limited and necessary to support beneficial uses.

In conclusion, the out-of-basin transfer of Stanshaw Creek water to Irving Creek through the Marble Mountain Ranch for hydropower and/or domestic use purposes represents a potential and active discharge of waste and a potential threat to beneficial uses that is within our purview to regulate via the Porter Cologne Water Quality Control Act.

Order Directive No. 2

Requires a Restoration and Monitoring Plan; the due date for the plan was September 10, 2016. The highlighted sections of Directive No. 2 below are areas not

adequately addressed by Discharger's correspondence dated April 10, 2017. As of June 16, 2017, we have not received a plan meeting Directive requirements. **Marble Mountain Ranch is 279 days late in meeting this requirement.** The Directive remains in effect. Directive No. 2 states:

2. *Retain an appropriately licensed and experienced California- licensed professional to evaluate, assess, and develop a Restoration and Monitoring Plan (RMP) to restore and stabilize the head cut and slope at the outlet of the Stanshaw Creek diversion to the unnamed tributary of Irving Creek. Submit the plan by **September 10, 2016**, to the Executive Officer for review and approval.*
 - a. *The RMP shall (1) restore the vegetative and hydrological functions of the damaged streams to ensure the long term recovery of the affected streams; and (2) replant the slopes and streamside areas with native vegetation to prevent erosion and sediment delivery to streams.*
 - b. *The RMP shall include and apply best management practices for all current and planned work associated with construction activities affecting, or having the potential to impact, the ditch outfall, unnamed tributary and Irving Creek. The RMP shall contain, at a minimum, design and construction standards, specifications, and designs for stream restoration, surface drainage controls, erosion control methods and standards for unanticipated precipitation during restoration, compaction standards, an implementation schedule, a monitoring and reporting plan, and success criteria meeting the requirements specified herein.*
 - c. *The RMP shall include map(s) and/or project designs at 1:12000 or larger scale (e.g., 1:6000) that delineate existing site conditions including existing channels, the projected restored slopes and stream channels, illustrating all restoration plan work points, spoil disposal sites, re-planting areas, and any other factor that requires mapping or site construction details to complete the scope of work.*
 - d. *The RMP shall include a time schedule for completing the work including receiving any necessary permits from State, County and/or federal agencies that may be required. The time schedule must adhere to any regulatory deadlines prescribed by the State Water Resource Control Board or North Coast Regional Water Quality Control Board.*
 - e. *To ensure a successful re-vegetation/earthen stabilization effort, site restoration and mitigation, the Discharger shall monitor and report for five years. All tree and shrub plantings must have a minimum of 85% success of thriving growth at the end of five years with a minimum of two consecutive years (two growing seasons) of monitoring after the removal of irrigation. Planting shall be adequately spaced to ensure adequate vegetative cover to control surface erosion and increase soil stability. In the event the re-planting fails, re-planting is required and the monitoring shall be extended for another five years until the 85% success rate of vegetation re-establishment is accomplished. The Dischargers are responsible for replacement planting, additional watering, weeding, invasive/exotic eradication, or any other practice to achieve the success criteria.*

- f. The RMP must include a time schedule for completing the work, including receiving any necessary permits from State, County and/or federal agencies that may be required. The time schedule must describe and include installing temporary erosion control measures prior to October 15, 2016, and completion of slope and ditch outlet restoration by October 15, 2017.*
- g. A monitoring plan is required for all site restoration and replanting to determine the success of stream restoration efforts and re-vegetation. The monitoring plan must include regularly scheduled inspections, and established monitoring photo points of sufficient number to document the site recovery for five years or until the Site is restored, mitigation is complete, vegetation is reestablished, erosion is no longer ongoing and meets the success criteria in the approved RMP. These photo-documentation points shall be selected to document the stability of the tributaries. The Dischargers shall prepare a site map with the photo-documentation points clearly marked. Prior to and immediately after implementing the restoration and/or mitigation, the Dischargers shall photographically document the pre- and post-conditions of the tributaries at the pre-selected photo-documentation points. The Dischargers shall submit the pre-restoration photographs, the post-restoration photographs, and the map with the locations of the photo-documentation points to the Water Board as part of the as-built report as defined below;*

*The monitoring plan must include regularly scheduled inspection dates. We recommend October 15, January 5, and March 1 of each year, and a monitoring report is required within 30 days of each inspection. Monitoring Reports shall summarize monitoring results; describe any corrective actions made or proposed to address any failures of the Site and restoration measures (features to be assessed for performance and potential failure include, but are not limited to, erosion controls, stream bed and bank erosion, sediment discharges, work, and re-vegetation); and include narrative and photo documentation of any necessary mitigation and evidence of successful restoration and Site recovery for five years, or until Site recovery meets the approved success criteria. At the conclusion of restoration work, when the site is stable and the monitoring program has been fulfilled, submit a Summary report by **January 1, 2021, or the year that site remediation and replanting meets the approved success criteria**. The Executive Officer or designee will review the report and determine if the site meets all the requirements and the Order can be terminated.*

We recognize that in your April 10, 2017, correspondence you submitted a brief narrative description developed by ECORP Consulting requesting permission to conduct work in the Irving Creek Drainage to stabilize the outfall claiming that due to there being equipment on site this was a good time for you to do the work. The plan submitted lacks design details and specifics for us to review and approve for implementation. For example:

1. Stating the head cut may be sloped back without specifics is inadequate.
2. Showing a drawing of a root wad and stating this is what will be used to stabilize the head cut without any design details is inadequate.
3. The pictures and narrative had no scale, no diagram, and no clear plan.

4. The narrative did not identify what permits would be applied for and received from appropriate permitting agencies.
5. The narrative and letter requested to work in April of a wet year without consideration for the near stream conditions of the site.
6. No erosion controls were provided in terms of prescribed Best Management Practices to control erosion during and after construction.

We also want to iterate that regardless of the ultimate water delivery solution for the conveyance and the return flows from the diversion; work will be required to stabilize the head cut at the Irving Creek outfall to prevent erosion and sedimentation.

Order Directive No. 3

Directive 3 requires a ditch assessment for erosion and failure prone areas (Directive 3.a) and a Ditch Operations and Maintenance Plan (Directive 3.b) these items were due on October 15, 2016, as of June 16, 2017, you are **244 days late in complying with the directive.**

Order Directive 3 and 3.a

*3. In the event that the delivery system will require continued operation of all or a portion of the diversion ditch, retain an appropriately qualified and experienced California-licensed professional to evaluate and submit a report to the Executive Officer for review and approval by **October 15, 2016**. The report shall include the following:*

- a. Evaluation of the entire ditch system, identifying all features and locations susceptible to failure by any of the physical processes and mechanisms described herein, (including but not limited to ditch seepage, berm fill saturation, upslope cutbank stability), and identifying where there is potential for sediment delivery to receiving waters in the event of a failure.*

Specify appropriate corrective action measures or steps to take, including design and construction standards and an implementation schedule to complete the defined scope of work. In addition, assess all areas of past failures to determine if the features reach Stanshaw Creek and deliver sediment and represent future delivery routes that require mitigation, propose mitigation as necessary to control sediment delivery and surface flows in the event of future failures or during annual rainfall events.

In the April 10, 2017, correspondence, you determined that the Fiore Geosciences report meets this requirement. We acknowledge that the report completes the required inventory of the ditch, but it does not identify mitigations for active and potential erosion with the exception of stating the ditch should continue to operate in substantially the same manner that has led to hundreds of cubic yards of sediment delivery over many years. To continue, we find in your response lacks

logic when we consider Fiore Geosciences findings regarding erosion during Water Year 2017. In water year 2017, the data provided by Fiore Geosciences finds 173 cubic yards (yd^3) of sediment is produced from erosional processes associated with the ditch system. Of this 173 yd^3 , 12.5 yd^3 is delivered to streams or flood prone areas, with 10 yd^3 of this delivery coming from one site identified in Table 3 as a head cut. We find this erosion occurring in Water Year 2017, even though you claim you have not operated the ditch. This speaks poorly as to the stability of the ditch. These findings represent both a threat of erosion and active erosion; sites prone to these problems likely require mitigation, and/or ongoing monitoring. Your response does not recognize that active and potential sources of erosion require mitigation. Please address the remainder of Directive 3 a, which includes proposing mitigation to address sites that Fiore Geosciences identifies as actively eroding or having the potential to erode.

Order Directive No. 3.b

As you mention in your April 10, 2017, correspondence, you are working with ECORP to develop a ditch operations and maintenance plan. We look forward to receiving the plan when you complete it. As of June 16, 2017, you are **244 days** late in providing the information required to satisfy Directive 3.b.

- b. A ditch operation and maintenance plan that includes an inspection and maintenance schedule and identifies any permits required for the scope of work anticipated. The plan should include proposed measures to ensure that the slopes above the ditch do not collapse into or block the ditch, that water seepage from the ditch does not saturate underlying materials and result in failure, that the ditch does not overtop the berm, that the berm does not fail, and that sediment does not deliver from the ditch to waters of the state. The plan must also include specifications for measures to be constructed and/or incorporated to prevent further erosion and sediment delivery from the discharge point to Irving Creek, and to restore and stabilize the channel between the discharge point and Irving Creek.*

Directive No. 4.a

We find the Fiore Geosciences report meets Directive 4.a requirements.

Directive 4 *Regardless of the ultimate water delivery system, the following additional measures shall be taken by September 10, 2016, to protect water quality:*

- a. Assess slopes between the upper ditch and Stanshaw creek and the streambed of Stanshaw Creek and Irving Creek and the unnamed tributary to Irving Creek for stored sediment deposits and erosional sources associated with the past and current failures of the ditch. Identify all erosional issues and those that should be corrected, propose corrective measures and provide a schedule for implementing corrective measures.*

Directive No. 4.b

Directive No. 4.b is partially met, as we have previously stated. In the event the ditch again becomes operational, additional water quality monitoring will be required.

- b. Ensure that water used onsite, conveyed in the ditch and discharged does not adversely impact waters of the state. Develop a sampling plan to assess the quality of water in the ditch as it passes through the ranch property for potential sources of fecal coliform, total coliform, total petroleum hydrocarbons, temperature, and nutrients. The sampling plan shall assess water quality above the diversion and ranch complex, and below the ranch complex to evaluate if there are any pollutants entering the surface waters from the ditch or pond. Submit the Sampling Plan for approval by the Executive Officer by September 10, 2016. Upon approval implement the sampling plan and provide results of the sampling by November 1, 2016. In the event that sampling identifies inputs of constituents of concern, then develop a plan to remedy the discharges and submit the plan by December 1, 2016, to the Executive Officer for review and approval.*

Directive No. 5

Directive 5 requires the submittal of quarterly progress reports.

We are taking a broad view of progress reports and allowing the correspondence you have submitted to meet this requirement. However, we expect compliance with outstanding directives and regular progress report as required by Directive No. 5, are a good way for you to let us know you are working toward compliance.

Directive No. 6

Directive 6 requires all work to be completed by October 15, 2018.

You are in compliance with this requirement, as long as you complete all required work by October 15, 2018.

Directive No. 7

Directive 7 requires a completion report following completion of the required work.

The completion report is due on December 15, 2018.

Fiore Geosciences Report (Fiore Report)

As noted above, the report provides information that meets some of the Order Directive requirements, but falls short in meeting all requirements. In addition, the Fiore Report itself provides evidence of active erosion associated with the ditch in a water year you contend you have not operated the ditch for hydropower. Yet, the Fiore Report's recommendations fail to address Order requirements adequately by providing mitigation plans and designs that can be accepted and then submitted to the appropriate agencies for permitting.

The Fiore Report, as we interpret it, additionally appears to identify that over the operational period of the ditch spanning from 1956 to the present water year the ditch has caused 1314 yd³ of sediment delivery from 11 sites. Fiore Report finds the Irving Creek outfall erosional void as representing 775 yd³ of erosion. The Fiore Report then extrapolates this data over a 72-year period and allows that 11 yd³/year likely eroded over the 72-year period. This finding seems somewhat inconsistent with the statement in Table 3, emphasis added "3) Pre-WY2017 features were most likely triggered by storms during WY 2006 and previous water Years". As do we, it appears that Fiore Report recognizes that the erosional voids associated with the ditch were likely triggered by an event; a ditch failure is a likely cause in many locations. One cannot know the past, but one can assess the present, and as such, at present, as identified in Regional Water Board staff *Inspection Report Stanshaw Creek Diversion, Marble Mountain Ranch, Douglas and Heidi Cole, Landowners, 92520 Hwy 96 Somes Bar, Siskiyou County dated March 9, 2015*, (RWB Inspection Report) (Attachment G) and as supported by Fiore Report, ditch failures appear to be associated with ditch overtopping or berm saturation, cut bank slumps, and ditch capacity loss through sediment accumulation resulting in overtopping and berm saturation or a combination thereof.

The Fiore Report identifies approximately 30 erosional features (see figure 2) and does not recommend any additional work other than continuing to operate the ditch in a similar manner, with the exception of ditch dredging, ditch enlargement, and simple (undefined) measures of low cost erosion controls without design details, best management practices, and a schedule for proposed work.

In regard to the ditch stream crossing, approximately located in the vicinity of Fiore Report figure 2 points 474-488, the Fiore Report incorrectly characterizes the Regional Water Board inspector's findings in the RWB Inspection Report by assigning these values (150-300 yds³) to an erosion potential rather than the intended erosional void caused in part by a shotgunned overflow culvert and likely past ditch failures, which resulted in an erosional void estimated as 150-300 yd³ by Regional Water Board staff. The RWB Inspection Report estimated range of 150-300 yd³ pertains to the existing erosional void as a delivery volume essentially subject to penalty and is not directed at defining the erosional volume should the existing culvert under the ditch fail. Figure 3 of the Fiore Report shows this location, and it is evident that active erosion is continuing on exposed soils due to natural and diverted flows. This would indicate that the void is likely enlarging through the interaction of the shotgunned culvert installed to control ditch overflow and culvert stream crossing. Continued erosion of these areas increases the potential for the ditch to fail at this location and deliver the sediment volume of 80 yd³ projected by Fiore Report. It is of note, that in a year when the ditch is not being operated for hydropower, we see the shotgunned overflow functioning in Figure 3 of Fiore Report.

Regarding the threat of delivery assessment provided by Fiore Report in terms of identifying the first 1,000 feet of the Stanshaw Creek diversion ditch as representing the highest threat of delivery; we do not disagree. However, we note that no mitigation plans

have been provided to address areas identified as erosional problems as required by Directive 3.a.

Conclusion:

To date you remain in violation with a majority of Order Directives. A summary of the days of violation are within this Notice of Violation. Please be aware that you may be subject to administrative civil liabilities for failure to comply with the Order. The liabilities can be up to \$5,000 per day pursuant to Water Code section 13350 for each day the violation occurs. When there is a discharge, the liabilities can be up to \$10,000 per day and \$10 per gallon of waste discharged pursuant to Water Code sections 13385.

Insofar as the April 10, 2017, letter addresses water right issues, the Regional Water Board's authority does not extend to the regulation and enforcement of water rights. Please direct any questions regarding the Draft Order to the enforcement staff at the Division of Water Rights.

If you have any questions, please contact Stormer Feiler of my staff by email at Stormer.Feiler@waterboards.ca.gov, or by phone at (707) 543-7128.

Sincerely,

Shin-Roei Lee
Assistant Executive Officer

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Enclosures:

- Attachment A- 170424_SRF_RWB 4-24-17 response letter
- Attachment B- 2015.01.28 Email from TSoto to Sanderson fish kill
- Attachment C- Ross Taylor and Associates prepared a report, January of 2015, "Findings Report for Stanshaw Creek Habitat and Instream flow Assessment"
- Attachment D- Stanshaw Creek Coho Habitat Enhancement Project FRGP Grant #P1110319
- Attachment E- 20160803 Stanshaw NMFS final recommendation letter
- Attachment F- Appendix 9 Klamath TMDL Thermal Refugia Locations
- Attachment G- Order No. R1-2014-0006 Att. 1
- Attachment G-1- Order No. R1-2014-0006 Att. 2
- Attachment H- RWB Staff Inspection Report

Certified-Return Receipt Requested

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