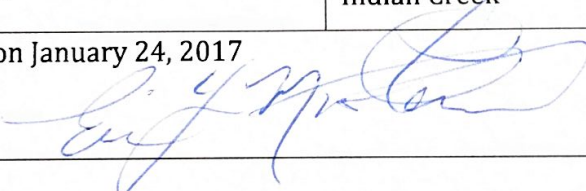


Attachment F

Field Inspection Report			
Name and Location of Facility Inspected Trinity County APNs 015-170-29 015-170-32, and 015-170-34 1400 Frietas Gulch, Douglas City, CA		Inspection Date October 7, 2015	Inspection Time 9:30 a.m.
Names & Titles of Property Owner¹ at Time of Inspection	Address		Notified of Inspection?
Shahin Memari	801 No Way Out Ct. Diamond Springs, CA 95619		24-hour notice
Names & Titles of Current Property Owner	Address		Consent Provided? Administrative Warrant
Wanderlust Healing Retreat LLC	PO Box 3603, Eureka, CA 95502-3603 or 220 Wabash Ave., Apt. 4 Eureka, CA 95501-2901		Notified of Inspection? N/A
Inspector Name & Title² Erin Mustain, Senior Water Resource Control Engineer, State Water Resources Control Board (State Water Board) Office of Enforcement (OE)			
Attending Agency Representatives Derek Magnuson, Engineering Geologist, North Coast Regional Water Quality Control Board (Regional Water Board) Adona White, Water Resource Control Engineer, Regional Water Board Tobi Freeny, Staff ES, California Department of Fish and Wildlife (CDFW) CDFW Wardens (DeWayne Little, Aaron Galway, and Paul Cardoza)			
Weather Conditions at the Time of the Inspection: Sunny and clear. Average temp: 65° F. No wind or recent precipitation.		Receiving Waterbody Name(s): Indian Creek	
Prepared By: Erin Mustain on January 24, 2017  2/13/18			
Foot Notes: 1. The inspection was conducted under an administrative warrant in the presence of the owner. 2. All photographs were taken by Erin Mustain unless otherwise noted and are compressed.			

I. Background

The property identified as Trinity County Assessor's Parcel Numbers 015-170-29, 015-170-32, and 015-170-34 (Property) is located in the Indian Creek watershed. Indian Creek is tributary to the Middle Fork Trinity River and located in the Douglas City Hydrologic Subarea of the Upper Middle Trinity Hydrologic Area near Douglas City, California. The Middle Fork Trinity River is listed as impaired due to sediment pursuant to Clean Water Act section 303(d). On December 20, 2001, the United States Environmental Protection Agency approved a Total Maximum Daily Load (TMDL) for sediment that indicates "Cold Water Fishery" as a beneficial use currently impaired in the watershed. The TMDL also indicates that populations of several anadromous salmonid species present in the Trinity River and its tributaries are in severe decline. The population of coho salmon is listed as threatened under the federal Endangered Species Act.

As part of the statewide pilot cannabis regulation and enforcement initiative, the Water Boards and the California Department of Fish and Wildlife (CDFW) identified Indian Creek as a sub-watershed with critical resources that are or may be adversely impacted as a result of cannabis cultivation. The Water Boards and CDFW inspected private parcels with cannabis cultivation throughout the watershed in April 2015. During those inspections, Shahin Memari denied consent to inspect his

property. On October 5, 2015, State Water Board staff obtained an investigative warrant from the Trinity County Superior Court. On October 6, 2015, at approximately 9:15 a.m., Lieutenant DeWayne Little and I posted an inspection notice on the gate leading to the access road to the Property.

On October 7, 2016, staff from the State Water Board, the North Coast Regional Water Quality Control Board (Regional Water Board), and CDFW conducted an onsite inspection of the property.

II. Site information

The Property is located near Douglas City. Frietas Gulch, a tributary to Indian Creek, runs through the southeastern corner of the Property. There are also several unnamed tributaries to Frietas Gulch on the Property. The Property is 30 acres, roughly 75 percent vegetated and has clearings for cultivation and access. Private roads run throughout the Property, connecting various developed features. Site terrain generally slopes from the northeast to the southwest, with elevations ranging from 3600 feet above mean sea level (AMSL) in the southwestern corner of the Property to 3940 feet (AMSL) in the northeastern corner, with 340 feet of relief.

Inspection area surficial geology¹ was mapped as *Ogb*: Trinity ophiolitic assemblage of the Ordovician age comprising of gabbro. There is a fault approximately 1000 to 1500 feet to the east of the Property and a thrust fault approximately 1500 feet to the west.

Based on the Web Soil Survey², the Property falls mostly in map unit 144, the Etsel-Weitchpec Complex, 50 to 75 percent slopes. Etsel makes up 60 percent of the unit and consists of gravelly loam; Weitchpec, 20 percent and consists of gravelly, sandy loam; and xerofluvents, 2 percent. Etsel is categorized as soil hydrologic group D and Weitchpec as soil hydrologic group C (Source: SoilWeb³).

Group C soils have moderately high runoff potential when thoroughly wet and Group D soils have high runoff potential when thoroughly wet⁴.

III. Property Ownership

At the time of inspection, Shahn Memari owned the Property. The Property is currently owned by Wanderlust Healing Retreat LLC. Wanderlust Healing Retreat LLC filed an Article of Organization of a Limited Liability Company on April 12, 2016, listing Shanti Zarcufsky as the Agent for Service of Process. Shanti Zarcufsky is also listed as both the Agent and Member of the LLC on the Statement of Information filed on July 5, 2016. The type of business is listed as "a yoga and meditation retreat."

¹ United States Geological Survey. *Scientific Investigations Map 3095: Geologic Map of the Weaverville 15' Quadrangle, Trinity County, California*. William P. Irwin. 2009. <https://pubs.usgs.gov/sim/3095/sim3095-map.pdf>.

² Web Soil Survey is a tool provided by the United States Department of Agriculture's Natural Resources Conservation Service

³ University of California at Davis, Agriculture and Natural Resources SoilWeb

⁴ *Part 630 Hydrology National Engineering Handbook, Chapter 7 – Hydrologic Soil Groups*. United States Department of Agriculture, Natural Resources Conservation Service. January 2009.



Created by Erin Mustain
 Senior Water Resource Control Engineer
 1/30/2017
 rev. 12/6/2017

- | | |
|---------------------|--------------------|
| Crossing | Waterbodies |
| Greenhouse | Roads and Highways |
| Outdoor Cultivation | Parcels |
| Shed | |
| Tent/Residence | |
| Well | |

Note: State Water Board staff generated the map using data collected in the field using hand-held GPS units.



Figure 1 – Site Diagram

Source: U.S. Department of Agriculture's National Agricultural Imagery Program (NAIP) 2016

IV. Inspection Observations

At approximately 9:30 a.m., Water Board staff began inspecting the Property to identify any impacts to water quality. This report will focus on water quality issues we observed and documented, or where applicable, specify the name of the staff person who took the measurement/collected data.

In the uppermost corner of the Property, I observed an outdoor cultivation area, denoted as OC1 on Figure 1 (Photo 1). In the background of Photo 1, the outdoor cultivation area, the greenhouse, and a recreational vehicle are visible. In the foreground lies water storage tanks, the well, and a storage shed. The well is denoted as W on Figure 1 and shown in Photo 2. Mr. Memari stated that the well was 280 feet deep, which is consistent with the application for the water well that the county provided State Water Board staff. There were two water tanks; one had a 5,000-gallon capacity and the other 550-gallon. Staff knocked on the tank walls and estimated that the larger was only holding approximately 1000 gallons at the time of inspection.

The upper cut slope of the clearing was covered with straw (Photo 3) and it had a drainage ditch (Photo 4) along the top of the slope. Derek Magnuson probed the soil to 18 inches and evaluated the soil to be reddish brown, sandy clay. He measured the hypotenuse of the upper cut slope to be approximately 14 feet and its average slope to be 25 percent.

The shed near OC1 is denoted as S on Figure 1. There were chemicals inside the shed and in trash cans near the shed (Photo 5). With the exception of the Extreme Gardening Mykos, which was in a sealed bag, the chemicals were in capped, plastic containers. The following fertilizers/amendments were on a shelf in the shed: Dark Energy Plant Nutrient, Extreme Gardening Mykos, Botanicare Fulvex, and Cal-Mag. The following pesticides were on the shelf: OxiDate 2.0 (hydrogen peroxide), Monterey Garden Insect Spray (spinosad), Safer Caterpillar Killer, Bionide Sulfur, and Botanicare Hydroguard. There was also a container of pH 7.0 calibration solution on the shelf.

Outside the shed, I observed a container of Age Old Bloom 5-10-5 fertilizer on the ground under a tarp; it was sealed. I checked the volume of the fertilizer/amendments in the lined garbage can: the SeaCrop was empty and the Biodiversity KrabShake 1.25-0.5-0.2 was partially full. Both of these are fertilizers. There were two red, plastic fuel containers on the bare ground just outside of the shed, without containment and seven similar containers inside the shed.

Just northwest of inspection location S, Derek Magnuson probed the loose soil down to two feet.

On the side of the road southwest of OC1, there was a large pile of soil that was uncovered and exposed to the elements (Photo 6). There was an earthen pad that was approximately three to four feet in height and was covered in straw, with a large tent, denoted as R on Figure 1. Derek Magnuson probed the fill pad to a depth of two feet.

On the southeast end of another outdoor cultivation area, denoted OC2 on Figure 1, I observed a padlocked shed that we did not investigate. Walking the perimeter of the disturbed area, we observed tension cracks on the side slopes (Photo 7). There was a 60-gallon mixing tank that was lying empty on a wooden pallet and not connected to any pipes. Approximately 10 feet from the mixing tank, staff saw the black irrigation pipes (seen throughout cultivation pad) were connected to white polyvinyl chloride (PVC) pipes, water valves, and a water timer. Near the connection, two small garden sprayers were lying on the ground. These were hooked up to the irrigation apparatus with smaller black, plastic pipes. Two pallets had debris consisting of zip ties, angle connectors, bamboo rods, and metal cans of what was likely joint compound. The cannabis plants were planted in potting soil with straw spread on the ground throughout the area.

On the road leading to the cultivation area, denoted as OC3 on Figure 1, there was another pile of dark soil; the pile lay between the northwest ends of OC2 and OC3. White PVC pipe connecting these two cultivation pads was buried where it crossed the road, but was otherwise exposed.

At OC3, we observed loose, bare soil. There was a similar irrigation system; small garden sprayers were hooked up to PVC pipes, water valves, and a water timer using garden connectors. The cannabis plants at OC3 were planted in potting soil with straw spread throughout the area. I saw spare/extra metal fencing and bamboo rods on the ground adjacent to OC3.

We continued southwest along the road to another outdoor cultivation area, denoted as OC4 in Figure 1. OC4 consisted of three terraces that were vegetated in between the terraces; OC4 had less disturbed soil than the other cultivation areas. OC4 had a similar irrigation system and similar conditions at this location, with straw spread among the cannabis plants. On the east side of OC4, just outside of its fence, I observed another pile of soil. I also observed a sealed, plastic container of Earth Juice fertilizer on the ground near the cannabis plants.

Throughout the site the roads had loose, un-compacted soil and ruts running along their length. Photos 8 and 9 show ruts along the road both upslope and downslope of inspection location OG3. We did not observe any best management practices or erosion controls on any of the roads.

Approximately 250 feet south of OC4, on the central north end of APN 015-170-29, we observed a Class 3 stream crossing, denoted as C1 on Figure 1 (Photo 10). The channel/ditch did not have a ford or culvert and was approximately 24 feet long.

We continued traveling east along the main road to APN 015-170-34, and followed what appeared to be a skid road that crossed Frietas Gulch (Photo 11). The crossing is denoted as C2 on Figure 1 and consisted of cobbles. Photo 12 shows the upstream channel.

Staff followed the main road as it snaked around to see if it also crossed the tributary and observed another crossing, denoted C3 on Figure 1 (Photos 13 and 14). C3 was located at the headwaters of Freitas Gulch and had a black, corrugated plastic 12-inch culvert. Derek Magnuson determined the soil content at this crossing to be brown, clayey sand.

Near OC1, I took two measurements of the road width, approximately 14 feet and 11 feet, and used their average of 12.5 feet to estimate the graded area. Using aerial imagery, I approximated the length of the road to be 5,800 feet and so calculated 72,500 square feet of disturbance or 1.66 acres.

I also used aerial imagery to determine the graded areas for each graded pad. These are listed in Table 1 below. The area of small small pad, inspection location R, though nominal, is also included.

Table 1. – Total Disturbed Area

Location	Area (square feet)	Area (acres)
Roads	72,500	1.66
Outdoor Cultivation Area OC1	7,330	0.17
Outdoor Cultivation Area OC2	14,678	0.34
Outdoor Cultivation Area OC3	4,782	0.11
Outdoor Cultivation Area OC4	7,056	0.16
Small pad	700	0.016
	Total	2.5

V. Photos



Photo 1 (Magnuson) -OC 1 (Facing Southwest)



Photo 2 - Well



Photo 3 (Magnuson) - Slope above OC1 (Facing Southeast)



Photo 4 (Magnuson) - Drainage around OC1 (Facing South)



Photo 5 (White) - Chemicals on bottom shelf



Photo 6 - Pile of soil

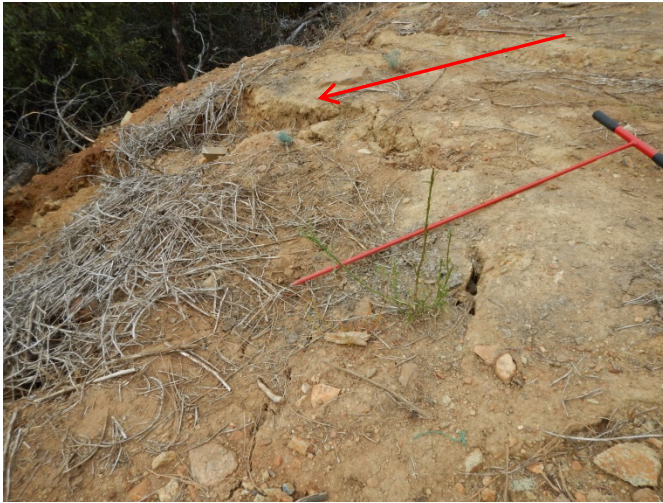


Photo 7 (Magnuson) -OC 2



Photo 8 -Downslope of OC3(Facing Northeast)



Photo 9 - Upslope of OC3 (Facing Southwest)



Photo 10 - Crossing C1



Photo 11 (Magnuson) - Crossing C2 (Facing North)



Photo 12 (White) - Channel above C2 (Facing Northeast)



Photo 13 (Magnuson) – Crossing C3 (Facing East)



Photo 14 (White) – Crossing C3

ENFORCEMENT DISCRETION

The observations in this report will be assessed for violations of the California Water Code. The Regional Water Board and the State Water Board reserve the rights to take any enforcement action authorized by law.