August 16, 2019

Francis Bushman
32000 Green Road
Cloverdale, CA 95425

Certified Mail No. 7016 2070 0000 6486 3354

Dear Mr. Bushman:

Subject: **Notice of Violation, Directive to Obtain Regulatory Coverage for Cannabis Cultivation, and Transmittal of Inspection Report for July 15, 2019, Inspection of Mendocino County Assessor's Parcel No. 033-040-33**

File: Cannabis Inspections, Mendocino County, 2019, 190715 Francis Bushman 033-040-33, CIWQS Place ID No. 859884

This letter is to notify you of observed violations of the requirements listed below for unauthorized discharges to waters of the state and United States from the above-referenced parcels (Property):

1. Water Quality Control Plan for the North Coast Region (Basin Plan) section 4.2.1 Prohibitions 1 and 2

2. California Water Code (Water Code) sections 13260 and 13264

Within 30 days, please contact Regional Water Board staff to discuss your plan to correct the observed violations.

I. Background

On July 15, 2019, staff from the Regional Water Board, accompanied by staff of the California Department of Fish and Wildlife (CDFW), California Department of Food and Agriculture CalCannabis Bureau, State Water Resources Control Board Division of Water Rights, and various law enforcement personnel, inspected the subject Property. The purpose of the inspection was to evaluate onsite development and conditions, and to identify and assess any impacts or threatened impacts to the quality and beneficial uses of waters of the state.

Attached is a copy of the water quality inspection report (July 15, 2019 Inspection Report). Please review the Inspection Report carefully and completely. The Inspection Report contains recommendations for correcting observed violations and advises you of the Regional Water Board permits necessary for instream work and projects/activities that result in discharges of waste to receiving waters.

A. Relevant Requirements

During the inspection, Regional Water Board staff identified several features and conditions on the Property that represent violations of water quality requirements and regulations. Attachment A – Regulatory Citations, provides references to these requirements and regulations.

B. Observed Violations

As documented in the July 15, 2019 Inspection Report, Regional Water Board staff observed violations of the Basin Plan Section 4.2.1 Prohibitions 1 and 2, and Water Code sections 13260 and 13264. Staff observed these violations at Property locations identified in the July 15, 2019, Inspection Report as Gw1, Gw2, Gw3, Road Crossing, Road Sediment, Drying Area/Cannabis in Class 3, Chemicals in Class 3, and Tank.

C. Additional Potential Liabilities

The Regional Water Board is in the process of considering whether the violations of the Clean Water Act, Water Code, and the Basin Plan warrant further enforcement. We encourage you to take steps, to correct the violations as soon as possible, securing any applicable permits from this and other agencies prior to conducting work. Please note that the existing conditions, as observed and documented in the Inspection Report, may represent continuing violations of the Water Code and Basin Plan.

Please note that correcting the conditions of non-compliance at the Property does not preclude enforcement for the violations alleged in this notice. As noted above, the Regional Water Board reserves its right to fully enforce the law against any violation and threatened violation by taking enforcement actions such as a cleanup and abatement order, time schedule order, administrative civil liabilities, and referral to the California Attorney General's office. Administrative civil liabilities may be assessed on a daily basis in the amount up to $5,000 for each day the violation occurs or up to $10 per gallon, but not both pursuant to Water Code section 13350.

D. Directive to Obtain Regulatory Coverage Prior to Future Activities Involving or Resulting in Discharges of Waste to Waters of the State

During the July 15, 2019, inspection, staff observed cannabis cultivation operations of sufficient size and scope to require regulatory coverage under the State Water Resources Control Board (State Water Board) Order No. WQ-2017-0023-DWQ, *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements*

for Discharges of Waste Associated with Cannabis Cultivation Activities (Statewide General Order). Please be aware that, pursuant to Water Code sections 13260 and 13264, if you elect to resume/continue cannabis cultivation on the subject Property, you must either:

1) Enroll the property under the Statewide General Order by providing the information required in the online application process. The application can be accessed at: https://www.waterboards.ca.gov/water_issues/programs/cannabis/

   Submit the application fee within **30 days** of submitting the on-line application. Failure to submit the application fee within 30 days will result in the application being voided and authorization terminated. Payments shall be identified using the Fee Payment Application Number (found on the Notice of Receipt). All checks or money orders shall be made payable to: "State Water Resources Control Board," and shall be delivered to:

   (By US Mail):

   Accounting Office
   Attn: Water Quality Fees –
   Cannabis General Order
   P.O. Box 1888
   Sacramento, CA 95812-1888

   (In person or by courier delivery):

   Accounting Office
   Attn: Water Quality Fees –
   Cannabis General Order
   1001 I Street
   Sacramento, CA 95814-2828

2) File a Report of Waste Discharge in order to obtain individual Waste Discharge Requirements (WDRs) specific to your property.

   Please submit the appropriate documents and payments to:

   North Coast Water Board
   Attn: Diana Henrioulle
   Enforcement Unit
   5550 Skylane Boulevard, Suite A
   Santa Rosa, CA 95403

Water Code section 13260 states, in relevant part:

(a) Each of the following persons shall file with the appropriate regional board a report of the discharge, containing the information which may be required by the regional board:

(1) Any person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than into a community sewer system.

Water Code section 13264 states, in relevant part:

(a) No person shall initiate any new discharge of waste or make any material changes in any discharge…prior to the filing of the report required by Section 13260 and no person shall take any of these actions after filing the report but before whichever of the following occurs first:

(1) The issuance of waste discharge requirements pursuant to Section 13263.

Failure to comply with Water Code sections 13260 and 13264 may result in an administrative civil liability under Water code sections 13261 and 13265 not to exceed $1,000 per violation for each day in which each violation occurs.

Future correspondence regarding this matter will be sent to you at this address unless an alternative address is provided to the Regional Water Board. Failure to accept mail from the Regional Water Board is not a valid excuse for non-compliance with any future enforcement orders, and a failure to respond or otherwise appear at a future enforcement proceeding could subject you to a default order and the imposition of administrative civil liability.

If you have questions about what is required of you to comply with the requirements outlined above, please contact Regional Water Board staff Heidi Bauer at Heidi.M.Bauer@waterboards.ca.gov or by telephone at (707) 570-3769 to advise as to your plan and schedule to correct the alleged violations as documented in the inspection report.

You may also contact me at Diana.Henrioulle@waterboards.ca.gov or by telephone at (707) 576-2350. Additionally, we are available to meet with you if you wish to discuss this letter or our waste discharge regulatory programs in further detail.

Sincerely,

Digitally signed by Diana Henrioulle
Date: 2019.08.16 16:24:38 -07'00'

Water Boards

Diana Henrioulle, P.E.
Enforcement Unit

190816_HMB_dp_FrancisBushman_Inspection_NOV

Attachments: Attachment A – Regulatory Citations
July 15, 2019, Water Quality Inspection Report

cc: Department of Fish and Wildlife
Douglas Wilson, CDFW Fish and Game Warden, Douglas.Willson@wildlife.ca.gov
Ryan Bourque, CDFW, Ryan.Bourque@wildlife.ca.gov
Tim Dodson, CDFW, Timothy.Dodson@wildlife.ca.gov

North Coast Regional Water Quality Control Board
Kason.Grady@waterboards.ca.gov

California Department of Food and Agriculture, CalCannabis Bureau
Shannon Townsend, CDFA CalCannabis Bureau, Shannon.TownsendBettis@cdfa.ca.gov
Michael Vella, CDFA CalCannabis Bureau, Michael.Vella@cdfa.ca.gov

State Water Resources Control Board Division of Water Rights
David Rosas, SWRCB DIV, David.Rosas@Waterboards.ca.gov
Gagan Bhullar, SWRCB DIV, Gagan.Bhullar@waterboards.ca.gov

Attachment A – Regulatory Citations

Regulatory Section	Citation
Basin Plan Section 4.2.1, Prohibition 1	Prohibits "[t]he discharge of soil, silt, bark, slash, sawdust, or other organic and earthen material from any logging, construction, or associated activity of whatever nature into any stream or watercourse in the basin in quantities deleterious to fish, wildlife, or other beneficial uses."
Basin Plan Section 4.2.1, Prohibition 2	Prohibits "[t]he placing or disposal of soil, silt, bark, slash, sawdust, or other organic and earthen material from any logging, construction, or associated activity of whatever nature at locations where such material could pass into any stream or watercourse in the basin in quantities which could be deleterious to fish, wildlife, or other beneficial uses."
California Water Code Section 13260	"(a) Each of the following persons shall file with the appropriate regional board a report of the discharge, containing the information that may be required by the regional board: (1) A person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than into a community sewer system. (2) A person who is a citizen, domiciliary, or political agency or entity of this state discharging waste, or proposing to discharge waste, outside the boundaries of the state in a manner that could affect the quality of the waters of the state within any region."
California Water Code Section 13261(a)	"A person who fails to furnish a report or pay a fee under Section 13260 when so requested by a regional board is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b)."
California Water Code Section 13264 (a)	"No person shall initiate any new discharge of waste or make any material changes in any discharge, or initiate a discharge to, make any material changes in a discharge to, or construct, an injection well, prior to the filing of the report required by Section 13260 and no person shall take any of these actions after filing the report but before whichever of the following occurs first:"
California Water Code Section 13265(a)	"Any person discharging waste in violation of Section 13264 , after such violation has been called to his attention in writing by the regional board, is guilty of a misdemeanor and may be

Regulatory Section	Citation
	liable civilly in accordance with subdivision (b). Each day of such discharge shall constitute a separate offense."
California Water Code Section 13350	"A person who (1) violates a cease and desist order or cleanup and abatement order hereafter issued, reissued, or amended by a regional board or the state board, or (2) in violation of a waste discharge requirement, waiver condition, certification, or other order or prohibition issued, reissued, or amended by a regional board or the state board, discharges waste, or causes or permits waste to be deposited where it is discharged, into the waters of the state, or (3) causes or permits any oil or any residuary product of petroleum to be deposited in or on any of the waters of the state, except in accordance with waste discharge requirements or other actions or provisions of this division, shall be liable civilly, and remedies may be proposed, in accordance with subdivision (d) or (e)."

TO: Diana Henrioulle

FROM: Heidi Bauer

DATE: August 12, 2019

Inspection Report for July 15, 2019, Warrant Inspection
Mendocino County Assessor's Parcel Number 032-226-04

File: Cannabis Program Inspections, Mendocino County, July 2019 MCSO Inspections, Francis Bushman, CIWQS Place ID. 859884

Property information:

County: Mendocino

Physical address: 8500 Simmerly Road, Laytonville.

APN**: 032-226-04**

Owner: Francis Bushman

Transaction History: Last sale April 27, 2018; seller JM Development LLC. Information on sales back to Jun 9, 2006, (LandVision), show Frank and/or Francis Bushman as buyer or seller.

Size**:** 196 acres

Watershed: Eel River Hydrologic Unit; Middle Eel River Hydrologic Area; Spy Rock Hydrologic Subarea (HU/HA/HSA 111.42; Table 2-1, Water Quality Control Plan for the North Coast Region).

Black Oak Creek transects the center south of the site and Corbet Creek crosses the site to the north.

Aerial Imagery Notes (Google Earth Pro): Minimal development visible prior to June 2009 imagery (August 2006 most recent prior). Additional and/or more developed roads and a new structure visible June 2009. Signs indicative of cannabis cultivation at visible at three locations, September 2010.

Images 1 and 2, below, show that significant grading and tilling occurred sometime between May 2014 and October 2017 on the area identified as Gw3 on Figure 1 (below). The disturbed area appears to be about 120,000 ft^2, or nearly 3 acres. During this time period it also appears that 4-5 hoop houses were installed and roads were built or re-developed.

Image 1 – May 2014 (Google Earth Pro)

Image 2 – October 2017

Regulatory status with the Regional Water Board:

Site Development: N/A

Applicable programs: Clean Water Act section 401 Water Quality Certification for fill in a watercourse.

Onsite activities/operations: N/A

Applicable programs: Statewide Cannabis Order WQ 2017-0023-DWQ, 401 Water Quality Permit

Inspection information:

Date/time: July 15, 2019; 0830

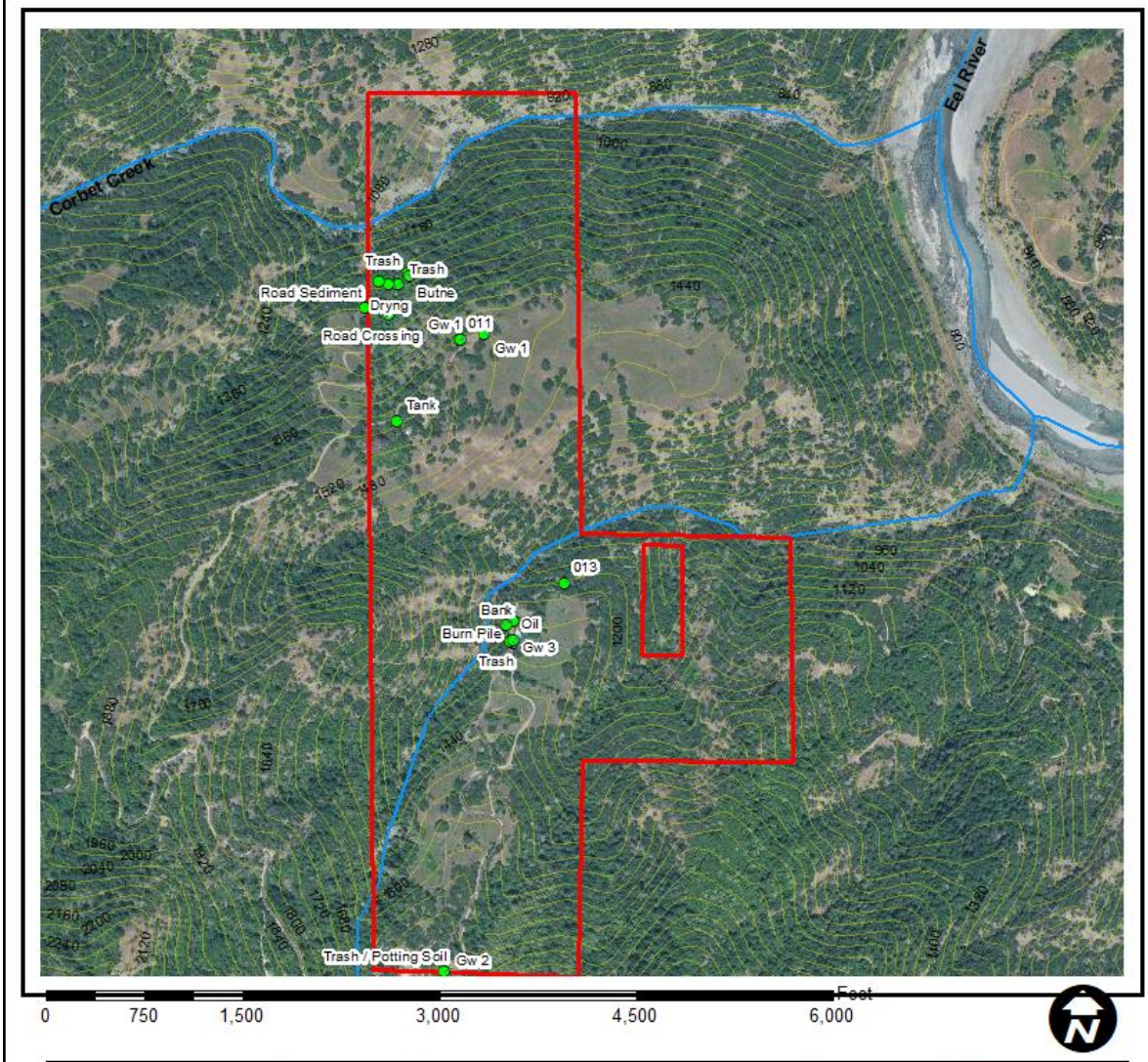
Type: Mendocino County Sheriff's Office Warrant Inspection

Attendance:
Mendocino County Sheriff's Law Enforcement personnel
Douglas Wilson, California Department of Fish and Wildlife (CDFW) Warden,
Ryan Bourque, CDFW
Tim Dodson, CDFW
Shannon Townsend, California Department of Food and Agriculture (CDFA), CalCannabis Bureau
Michael Vella, CDFA CalCannabis Bureau

David Rosas, State Water Resources Control Board (SWRCB) Division of Water Rights (DIV)
Gagan Bhullar, SWRCB DIV
Heidi Bauer, Engineering Geologist, North Coast Regional Water Board
National Guard personnel

Background/Objective:
North Coast Regional Water Board (Regional Water Board) staff participated with staff of the Mendocino County Sheriff's Office (MCSO), California Department of Fish and Wildlife (CDFW), State Water Board's Division of Water Rights (DIV), California Department of Food and Agriculture CalCannabis Bureau (CDFA), and personnel from various law enforcement agencies in four days of inspections of multiple cannabis cultivation sites in Mendocino County, on July 15-18, 2019. Inspection objectives for Regional Water Board staff included observing site development and activities and identifying and assessing onsite features or conditions that are causing or may cause adverse impacts to the quality and beneficial uses of receiving waters, including surface and ground water.

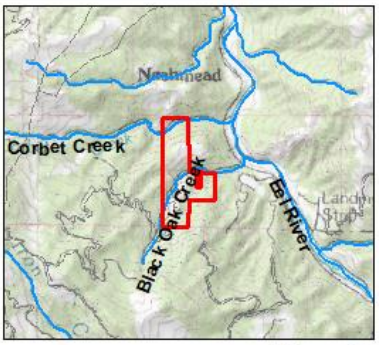
Inspection Map (Figure 1)



Mendocino County
APN 032-226-04-00
Francis Bushman Property

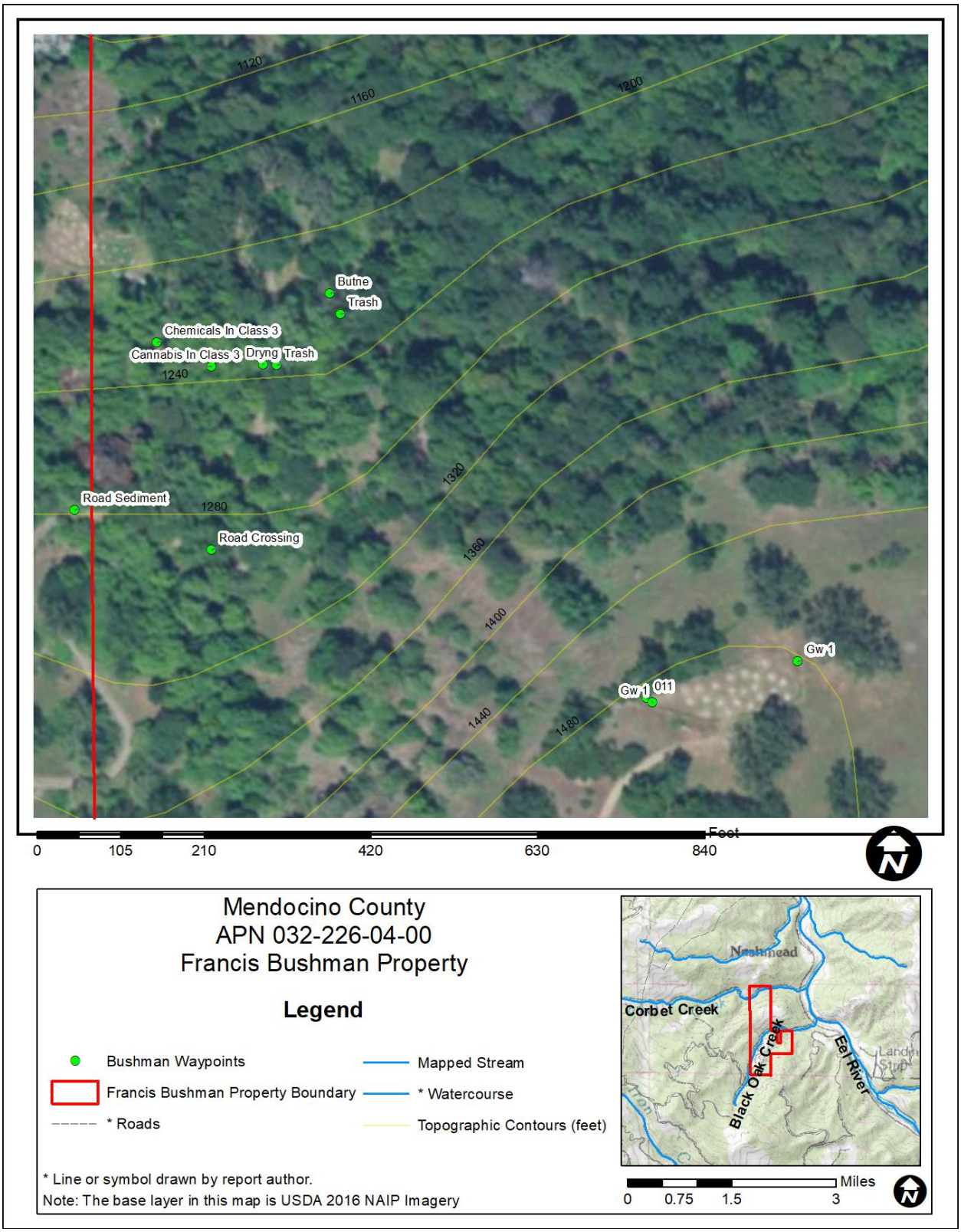
Legend

- Bushman Waypoints
- Francis Bushman Property Boundary
- * Roads
- Mapped Stream
- * Watercourse
- Topographic Contours (feet)



* Line or symbol drawn by report author.
Note: The base layer in this map is USDA 2016 NAIP Imagery

Inspection Map (Figure 2)



Inspection Observations:
I arrived on-site and observed a cannabis cultivation area (Inspection Point Gw1 on Figure 1 and Figure 2), estimated at 7500 square feet of disturbed area (Photo 1). There were no immediate water quality concerns in this area aside from the potting soil in garden rounds, which at the time of the inspection was contained and did not appear to be a threat to water quality.

To the northwest of Gw1, at the location identified as “Road Crossing” on Figure 2 (Photo 2), I observed a watercourse which was filled by an access road with no culvert or other type of stream crossing installed. The volume of fill material in the watercourse at this location was approximately 150 cubic feet as estimated from measurements taken in the field. At the inspection point identified as “Drying” and “Cannabis in Class 3” on Figure 2 (Photo 5), we observed a cannabis drying area which had been constructed adjacent to and within a Class 2 watercourse. In the watercourse at this location, we observed a container of Malathion (Photo 6 and 7). The next area observed, shown on Figure 2 was “Tank”, where we observed cannabis-related water tanks and petroleum-based fluids, and we observed trash within or adjacent to a watercourse. These are shown on Photos 7.5, 8 and 9.

At the south end of the parcel, we inspected a second outdoor cannabis cultivation area, identified as Gw2 on Figure 1. In this area, I observed loose potting soil and trash not properly stored. See Photos 10 and 11.

Towards the middle of the parcel, we inspected a third cannabis cultivation area (identified as Gw3 on the inspection map) with three hoop houses (Photo 12). As mentioned above, this area had apparently been developed/expanded significantly sometime between May 2014 and October 2017. I observed loose soils on steep banks surrounding the access roads and hillsides in this area. In addition, I observed assorted chemical containers (nutrients, petroleum), some with open unsecured tops (see inspection point “Chemicals”) and trash not properly stored (see inspection point “Trash”) (Photos 13 and 14). Lastly, in this same area (Photo 15), I observed a burn pile (“Burn Pile”), comprised of materials/waste that had been burned, at a location where it could be transported to surface waters in a storm event.

Map point	*Feature*	*Brief Description*	*Water Quality Concern*	*Associated Photo(s)*
Gw1	Outdoor cannabis cultivation area.	7500 square feet of cannabis cultivation	Cannabis cultivation/discharge of waste without a report of waste discharge and/or coverage under State Water Board regulatory order	Photo 1
Road Crossing	Road built through stream	Stream channel filled by road prism. Approximately 150 cubic feet of fill.	Earthen fill in surface water; channel blocked.	Photo 2 and Photo 3
Road Sediment	Access road sediment discharge point.	Evidence of sediment delivery from the access road into a Class III watercourse.	Discharge of waste to receiving waters.	Photo 2
Drying Area/Cannabis in Class 3	Cannabis, cultivation supplies, and waste in a watercourse	Drying cannabis, trash and chemicals (Malathion) in a watercourse.	Discharges and threatened discharges of waste to receiving waters.	Photo 5
Trash	Assorted litter and empty containers	Uncontained, uncovered wastes on the ground where they or any residual contents can enter or be transported into receiving waters.	Threatened discharge of waste to receiving waters.	Photo 4, 13, and 14
Chemicals in Class 3	Pesticide container	Malathion container in a stream channel	Waste discharged to receiving waters.	Photo 6,7

Map point	*Feature*	*Brief Description*	*Water Quality Concern*	*Associated Photo(s)*
Tank	Trash and fuel containers	Trash and fuel containers in and near a watercourse	Waste discharged to receiving waters; threatened discharge of waste to receiving waters.	Photo 7.5,8,9
Gw2	Cannabis cultivation area	Outdoor cannabis cultivation area	Cannabis cultivation/discharge of waste without a report of waste discharge and/or coverage under State Water Board regulatory order	Photo 10
Gw3	Cannabis cultivation area	Outdoor cannabis cultivation area	Cannabis cultivation/discharge of waste without a report of waste discharge and/or coverage under State Water Board regulatory order	Photo 12
Gw3	Earthen pad/clearing	2+ acre cleared/graded area with hoophouses; no evidence of erosion or sediment controls.	Threatened discharged of waste to receiving waters.	Image 1 and Image 2 above
Chemicals	Fuel containers	Pile of fuel containers on the ground where spills/leaks could enter or be transported into receiving waters.	Threatened discharge of waste to receiving waters.	Photos 13,14
Bank	Erodible material on steep sloped surface	Exposed and erodible soil threatening water quality.	Threatened discharge of waste to receiving waters	Photo 15

A comparison of conditions observed on the site with categories of activities typically associated with water quality concerns at cannabis cultivation sites:

1. Site maintenance, erosion control and drainage features: Access road leading to cultivation area 1 (Gw1) showed evidence of sediment discharge to a Class III watercourse. As noted above, staff also observed loose, erodible soil on the banks and hillslopes around Gw3.

2. Stream crossing maintenance and improvement: As noted above, staff observed a road crossing through a Class III watercourse without a constructed crossing to provide stable conveyance for stream flows.

3. Riparian and wetland protection and management: The cultivation area at Gw3 was less than 150 feet from a Class I watercourse (Black Oak Creek) and the dried cannabis had been placed within the channel of a Class 2 watercourse.

4. Spoils management: At Gw3, staff observed spoils (potting soil) in an area where it could be transported into receiving waters (Photo 16).

5. Fertilizers and soil amendments: Staff observed fertilizer and nutrient containers at locations where spilled or leaked material could enter or be transported into receiving waters.

6. Pesticides: Staff observed a bottle of Malathion, an insecticide, in a Class III watercourse.

7. Petroleum products and other chemicals: Staff observed a number of open containers of petroleum products on the ground, at locations where spilled or leaked material could enter or be transported into receiving waters.

8. Cultivation-related wastes: Apart from the potting soil spoils mentioned above, staff observed no water quality concerns associated with cultivation-related wastes.
9. Refuse and human waste: Staff observed uncovered, uncontained trash at several locations where it could enter or be transported into receiving waters. Staff did not observe or review human waste containment/disposal systems or features on the Property.

Recommendations:

1. Retain a licensed professional to inventory, assess, and develop a workplan and schedule to implement measures to ensure that all developed features, roads, watercourse crossings, and cultivation areas throughout the Property are corrected, restored, and/or maintained in conditions that prevent or minimize erosion, sediment transport/delivery, and adverse impacts to water quality and beneficial uses. Include measures to ensure that unstable features caused or affected by onsite development and operations are removed or otherwise

protected so as to minimize the potential for these features to cause adverse impacts to water quality and beneficial uses. Dispose of all development and restoration-related earthen spoils in a manner to prevent/minimize transport and delivery to receiving waters.

2. Retain a qualified professional to develop a workplan and schedule to remove the filled stream crossing associated with access road leading to Cultivation Area 1 (Gw1) and restore the channel to its natural state. Dispose of all development and restoration-related earthen spoils in a manner to prevent/minimize transport and delivery to receiving waters.

3. Prior to conducting any instream work associated with recommendation 2, above, submit to the Regional Water Board an application for Clean Water Act section 401 water quality certification, and secure approval from the Regional Water Board.

   The 401 Application may be found at the following hyperlink:

   https://www.waterboards.ca.gov/northcoast/water_issues/programs/wqc_docs/031616_401-Application.pdf

4. If the property owner and/or tenant(s) choose to continue to cultivate cannabis, enroll for coverage under and take steps to comply with the requirements of the CANGO (Order WQ 2017-0023-DWQ, General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities). More information about the CANGO can be found at this hyperlink:

   https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/finaladoptedcango101717.pdf

5. In the event that the property owner and/or tenant(s) propose in the future to develop or use the Property in a manner or method that will or may result in a discharge of waste to waters of the state in the future, staff recommend that the owner(s)/tenant(s) be aware of and comply with relevant regulatory requirements for water quality protection. For example, Water Code section 13260 requires that a person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than into a community sewer system shall file with the appropriate regional board a report of the discharge. Further, Water Code section 13264 states, in part: “No person shall initiate any new discharge of waste or make any material changes in any discharge…prior to the filing of the report required by Section 13260.” In addition, projects involving the disturbance of an acre or more of land are subject to regulation under the State Water Board’s Construction General Stormwater permit, and projects involving dredge or fill in waters of the United States are subject to regulation under Clean Water Act section 401.

You may find further information about Water Board permits that may apply to proposed site development or land use activities at this hyperlink:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/permit/

6. Collect and dispose of or contain all refuse, cultivation-related wastes and spoils in a location and manner so as to minimize potential for these wastes to enter or be transported into receiving waters.

7. Collect all chemical containers and dispose of or contain in a location and manner so as to prevent spillage and discharge to receiving waters. Provide secondary containment for all petroleum products.

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.

PHOTO APPENDIX

The following photos were taken in the vicinity of Cultivation Area 1 (Gw1 on Figure1)

Photo 1 – Cultivation Area (GW1)

Photo 2 – Road prism in Class 3 watercourse and sediment discharge into Class 3

Photo 3 – Additional photo of stream crossing obstructed
By access road.

Photo 4 – chemicals and trash

Photo 5 – Cannabis drying in watercourse

Photo 6 – Malathion in watercourse

Photo 7 – Closeup of Malathion in watercourse

Photo 7.5 – Water tanks, fuels and trash in/adjacent to a watercourse

Photo 8 – Trash and chemicals improperly stored/disposed of.

Photo 9 – Trash, chemical containers, and assorted wastes.

<u>The following photos were taken in the vicinity of Cultivation Area 2 (GW2 on Figure 1)</u>

Photo 10 – Cultivation Area 2 (Gw2 on Figure 1)

Photo 11 Cultivation Area 2 potting soil rounds

<u>The following photos were taken in the vicinity of Cultivation Area 3 (Gw3 on Figure 1)</u>

Photo 12 – Cultivation Area 3 (GW3 on Figure 1)

Photo 13 – Drums, chemicals and trash

Photo 14 – Chemicals and trash

Photo 15 – Burn pile

Photo 16– Upper portion of Cultivation Area 3 (Gw3) showing loose potting soil

cc:
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