



North Coast Regional Water Quality Control Board

September 25, 2019

Michael Lewis Shamel Jr.
Christina Dowling
P.O. Box 1485
Redway, CA 95560

Certified Mail No. 7016 2710 0000 2635 9230

Dear Mr. Shamel and Ms. Dowling:

Subject: Notice of Violation, Directive to Obtain Regulatory Coverage for Cannabis Cultivation, and Transmittal of Inspection Report for August 5, 2019, Inspection of Humboldt County Assessor's Parcel No. 221-101-013

File: Cannabis Inspections, Humboldt County, 2019, 190805 Michael Shamel and Christina Dowling 221-101-013, CIWQS Place ID No. 860365

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

California Water Code (Water Code) sections 13260 and 13264

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

This letter directs you, within 30 days, to take action to comply with Water Code 13260. In addition, this letter directs you, within 30 days, to contact Regional Water Board staff to advise of your plan to implement recommendations in the attached report.

A. Background

On August 5, 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

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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 (August 5, 2019 Inspection Report). Please review the Inspection Report carefully and completely. The Inspection Report contains recommendations for correcting observed violations and water quality concerns observed on the Property, 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.

B. Relevant Requirements

During the inspection, Regional Water Board staff observed 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.

C. Observed Violations

As documented in the August 5, 2019 Inspection Report, Regional Water Board staff observed cannabis cultivation and associated site disturbance of sufficient size and scope to require regulatory coverage under 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). The Regional Water Board has no record of this Property's enrollment under the Statewide General Order. Outdoor cannabis cultivation activities in California with land disturbance of 2,000 square feet or more that are not enrolled for coverage under the Statewide General Order or individual waste discharge requirements violate Water Code section 13260. Staff also observed violations of Water Code sections 13260, 13264, and Basin Plan section 4.2.1 Prohibitions 1 and 2 at the Property location identified as C1, C2, C3, and P1 in the August 5, 2019, inspection report.

D. Additional Potential Liabilities

The Regional Water Board is in the process of considering whether the violations of the 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.

E. Directive to Obtain Regulatory Coverage

Based on the observations detailed in the attached inspection report, and mentioned above, the Regional Water Board has determined that you are required to comply with Water Code section 13260 by taking one of the following actions within **30 calendar days of this letter**:

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

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 Henriouille
Enforcement Unit
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

OR

If you believe regulatory coverage is not required under either of the options listed above, either because you and/or your tenants elect to not resume or continue cannabis cultivation or associated activities, or because the operations that are occurring are not subject to regulation under the Statewide General Order or individual WDRs, please provide a written response explaining your non-applicability (with all supporting documentation including photos if necessary) to the Regional Water Board at the address provided above. Regional Water Board staff may contact you to verify your response.

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.

F. Inspection Report Recommendations

As mentioned above, the August 5, 2019, inspection report provides recommendations to correct violations, as well as to address features and conditions that threaten to impact water quality.

Within 30 days of this letter, please advise Connor McIntee of your intentions, plan, and schedule to implement recommendations in the inspection report. Connor can be reached at (707)576-2499 or, by email at Connor.McIntee@waterboards.ca.gov.

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 any questions regarding this matter, please contact Connor McIntee at the telephone number or email above. 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, in inspection report, or our waste discharge regulatory programs in further detail.

Sincerely,

Diana Henrioulle, P.E.
Enforcement Unit

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Attachments: Attachment A – Regulatory Citations
August 5, 2019, Water Quality Inspection Report

cc: Humboldt County
Meghan Ryan, Humboldt County Building and Planning, Cannabis Division
mryan2@co.humboldt.ca.us

Department of Fish and Wildlife

Ryan Bourque, Ryan.Bourque@wildlife.ca.gov
David Manthorne, David.Manthorne@wildlife.ca.gov

North Coast Regional Water Quality Control Board

Kason Grady, Kason.Grady@waterboards.ca.gov

California Department of Food and Agriculture, CalCannabis Bureau

Tabatha Chavez, Tabatha.Chavez@cdfa.ca.gov

State Water Resources Control Board Division of Water Rights

Stormer Feiler, Stormer.Feiler@waterboards.ca.gov
Steven Hall, Steven.Hall@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	<p>“(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:</p> <p style="padding-left: 40px;">(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.</p> <p style="padding-left: 40px;">(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.”</p>
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:”

Regulatory Section	Citation
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 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)."



GAVIN NEWSOM
GOVERNOR



JARED BLUMENFELD
SECRETARY FOR
ENVIRONMENTAL PROTECTION

North Coast Regional Water Quality Control Board

TO: Diana Henriouille

FROM: Connor McIntee

DATE: September 10, 2019

Subject: **Inspection Report for August 05, 2019, Warrant Inspection
Humboldt County Assessor's Parcel Number 221-101-013**

File: Cannabis Program Inspections, Humboldt County, August 2019 HCSO/CAMP
Inspections, Michael Shamel and Christina Dowling, CIWQS Place ID 860365

Property information:

County: Humboldt

Physical address: 8989 Doody Ridge Road, approximately 7 miles southeast of
Honeydew.

APN: **221-101-013**

Owner: Michael Lewis Shamel Jr. and Christina Dowling

Transaction History: Last sale June 24, 2005, seller/buyer Christina Dowling and buyer
Michael Lewis Shamel Jr. Prior sale January 26, 1999: seller John Barkley to buyer
Christina Dowling.

Size: 45 acres.

Watershed: Cape Mendocino Hydrologic Unit; Mattole River Hydrologic Area;
Ettersburg Hydrologic Subarea (HU/HA/HSA 112.30; Table 2-1, Water Quality Control
Plan for the North Coast Region).

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Aerial Imagery Notes (Google Earth Pro): Road and three small clearings visible from earliest available (August 2005) imagery. Small structures, vehicles, etc. visible in southernmost clearing, with additions, from August 2005 to present. Hoop houses visible in southernmost and northernmost clearings in August 2012 imagery. Hoop house visible in middle clearing in May 2014 imagery. All three cultivation areas look inactive/fallow in April 2019 imagery.

Regulatory status with the Regional Water Board:

Site Development: The Regional Water Board has record of receiving any paperwork associated with site development on the Property.

Applicable programs: 401 Water Quality Certification Program for instream work.

Onsite activities/operations: N/A.

Applicable programs: Cannabis cultivation waste discharge regulatory program.

Inspection information:

Date/time: August 05, 2019

Type: Humboldt County Sheriff's Office (HCSO)/Campaign Against Marijuana Planting (CAMP) Warrant Inspection

Attendance:

Ryan Bourque, Environmental Scientist (ES), California Department of Fish and Wildlife (CDFW)

David Manthorne, ES, CDFW

Steven Hall, ES, Division of Water Rights (DIV)

Connor McIntee, ES, North Coast Regional Water Quality Control Board (NCRWQCB)

Staff, California Department of Food and Agriculture (CDFA)

Multiple Law Enforcement Officials (LEO), HCSO

Multiple LEOs, CAMP

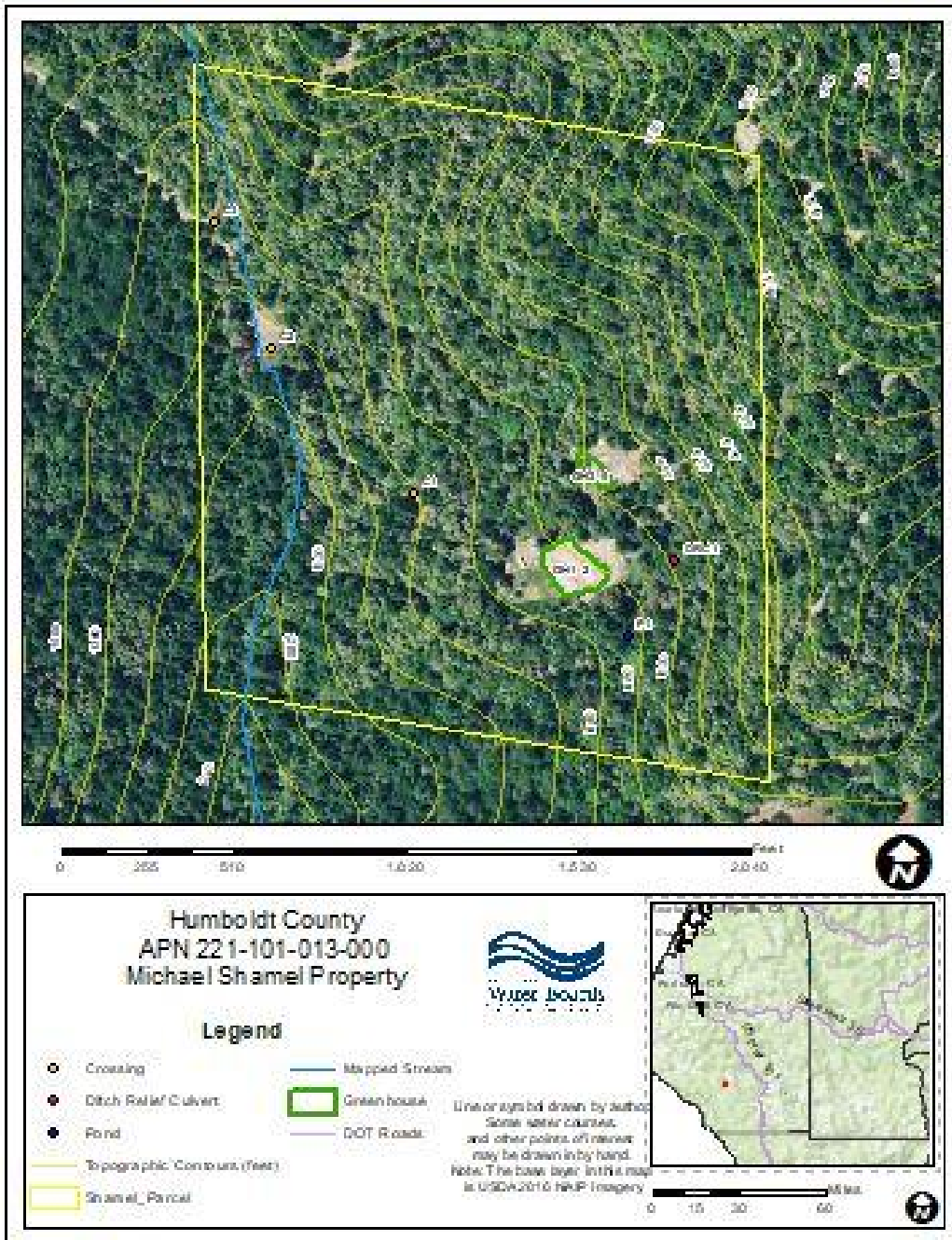
Multiple LEOs, CDFW

Background/Objective:

North Coast Regional Water Board (Regional Water Board) staff participated with staff of the Humboldt County Sheriff's Office (HCSO), California Department of Fish and Wildlife (CDFW), State Water Board's Division of Water Rights (DIV), California Department of Food and Agriculture (CDFA), and personnel from various law enforcement agencies in four days of inspections of multiple cannabis cultivation sites in Humboldt County, on August 5-8, 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



Inspection Observations:

On August 5, 2019, I inspected the subject property. Figure 1, above, is a site map showing the inspection points discussed below. Development on the parcel includes two areas that were being used for cannabis cultivation at the time of the inspection (GH1-2, and GH3-5), water supply infrastructure used for irrigating cannabis plants, including an onstream impoundment, as well as a network of connecting roads and related road infrastructure, including three stream crossings and one ditch relief culverts.

GH1-2 is located along the eastern portion of the Property, just uphill of the main access road. GH1-2 consists of an approximately 11,850-square foot earthen pad/clearing with cannabis cultivation in two greenhouses (not photographed). In this area I observed multiple piles of refuse, cultivation-related soil amendments and waste, and fertilizer, uncovered and/or uncontained. The cleared area associated with GH1-2 is approximately 50 feet from a class III watercourse, presenting a moderate to low threat of discharge of waste to waters of the state.

Downhill, to the southwest of GH1-2, I observed GH3-5. GH3-5 consists of an approximately 3,875-square foot earthen pad/clearing with cannabis cultivation in three greenhouses (not photographed). At GH3-5, I observed a generator and fertilizer, uncovered and/or uncontained (photos 1-2).

Throughout the parcel, I observed a network of roads, and at multiple locations throughout the road system, I observed evidence of inappropriate design and/or maintenance, including extended inboard ditches, and signs of erosions, including rilling and rutting (Photos 3-5). On the main access road, in between GH1-2 and GH3-5, I observed a ditch relief culvert, DRC1, that relieves an inboard ditch along the access road (photos 6-7). DRC1 consists of a 14" corrugated metal pipe (CPP) with a partially filled inlet and an outlet conduit consisting of precariously placed sheet metal onto loose fill material. The outlet of DRC1 drains into a class III watercourse approximately 50 feet downhill.

Downstream of the DRC1 outlet, a small access road leading to an onstream impoundment, P1 (Photos 8-10), confines the class III drainage and incorporates it into an inboard ditch. The inboard ditch directs its flow to the north western edge of P1, and, I observed evidence of rilling and rutting that suggests that some flow from the ditch diverts across the road, back into the native class III channel. In addition to the inboard ditch class III input, P1 also receives input from a second, class III, watercourse. The berm associated with P1 is located within the native channel of the second, class III, watercourse, and appears relatively stable. The outlet of P1 consists of a shotgunned 12" corrugated metal pipe (CMP), discharging onto the hillside between the two native channels, and eventually delivers to the first, class III, watercourse, below.

Along the main access road, southwest and downhill from GH3-5, I observed a culverted watercourse crossing, C1 (Photos 11-12) along a class III watercourse. The

culvert at C1 consists of a 24" CMP that is shotgunned, and the fill material has been stabilized with old cars.

Further along the main access road from C1, turning towards the northwest, I observed a second culverted watercourse crossing, labeled C2 on Figure 1 (photo 13-14). The culvert at C2 is a 30" corrugated plastic pipe (CPP) with a partially filled inlet and the fill material has been stabilized with old cars.

Continuing north on the access road, I observed a third culverted watercourse crossing, C3, along a class II watercourse (Photos 15-16). C3 consists of a 36" CMP with scoured inlet. The scouring indicates that the CMP is undersized and/or installed incorrectly. Additionally, the outlet of C3 is perched.

<i>Map point</i>	<i>Feature</i>	<i>Brief Description</i>	<i>Water Quality Concern</i>	<i>Associated Photo(s)</i>
GH1-2	Cannabis cultivation area	Greenhouse with active cannabis cultivation, soils, trash, fertilizer, petroleum	Cannabis cultivation/discharge of waste without a report of waste discharge and/or coverage under State Water Board regulatory order Threatened discharge of waste to waters of the state	N/A
GH3-5	Cannabis cultivation area	Greenhouse with active cannabis cultivation, soils, trash, fertilizer	Cannabis cultivation/discharge of waste without a report of waste discharge and/or coverage under State Water Board regulatory order	1-2

<i>Map point</i>	<i>Feature</i>	<i>Brief Description</i>	<i>Water Quality Concern</i>	<i>Associated Photo(s)</i>
DRC1	Ditch relief culvert	Road runoff relief into culvert that drains towards a watercourse	Threatened discharge of waste to waters of the State	6-7
C1	Watercourse Crossing	Culverted watercourse crossing inadequately installed and/or maintained	Threatened discharge of waste to waters of the State	11-12
C2	Watercourse Crossing	Culverted watercourse crossing inadequately installed and/or maintained	Threatened discharge of waste to waters of the State	13-14
C3	Watercourse Crossing	watercourse crossing inadequately installed and/or maintained	Threatened discharge of waste to waters of the State	15-16
P1	Instream impoundment	Onstream earthen dam impoundment	Discharge of waste to waters of the State. Dredge/fill in waters of the State.	8-10

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: As noted above, I observed inappropriately designed roads, including extended inboard ditches and inappropriately installed ditch relief culverts; roads showed signs of erosion, including rilling and rutting.
2. Stream crossing maintenance and improvement: As mentioned above, I observed 3 stream crossings that were inappropriately sized, installed, and/or maintained and represent a threat to water quality.

3. Riparian and wetland protection and management: I observed no water quality concerns associated with riparian and wetland protection and management on the Property.
4. Spoils management: I observed no water quality concerns relating to spoils management.
5. Water storage and use: I observed one onstream impoundment that intercepted at least two Class III watercourses, and that lacked a stable over/outflow conveyance structure.
6. Irrigation runoff: I observed no water quality concerns relating to irrigation runoff.
7. Fertilizers and soil amendments: I observed multiple locations where fertilizers and soil amendments were uncovered and/or uncontained, and in locations where they pose a significant threat to water quality.
8. Pesticides: I observed no water quality concerns relating to storage or use of pesticides.
9. Petroleum products and other chemicals: I observed no water quality concerns relating to storage or use of petroleum products and other chemicals on the property.
10. Cultivation-related wastes: I observed multiple locations where cultivation-related wastes were uncovered and/or uncontained.
11. Refuse and human waste: I observed multiple locations where refuse was uncovered and/or uncontained.

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 licensed professional to develop a plan and implementation schedule to remove the impoundment feature associated with point P1 identified in this report, and restore the impounded channel to its natural state.
3. Work with CDFW and the State Water Resources Control Board's Division of Water Rights (DIV) to determine and secure any applicable permits or licensing required for surface water diversion, storage, and use on the site. If the existing surface water diversions do not meet applicable CDFW or DIV requirements, remove diversion infrastructure from surface waters and ensure that restoration plans developed pursuant to Recommendation 1, above, include provisions for restoring any instream or riparian disturbance associated with this features or removal thereof.
4. Prior to conducting any instream work associated with recommendations 1 and 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.
5. 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

6. Collect and dispose of or contain all refuse and cultivation-related wastes in a location and manner so as to minimize potential for these wastes to enter or be transported into receiving waters.
7. Store and contain all chemicals, including petroleum, fertilizer and/or pesticides properly to prevent spillage and discharge to receiving waters. Provide secondary containment for all petroleum products.
8. 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/finaladopedcango101717.pdf

9. 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/

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



Photo 1: uncontained fertilizers adjacent to GH3-5



Photo 2: uncontained generator near GH3-5

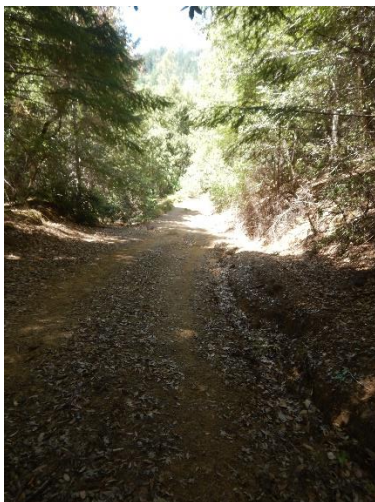


Photo 3: Insloped road with ditch



Photo 4: Rutting from inboard ditch crossing road, delivering to a class III watercourse.



Photo 5: Rutting from poorly drained road



Photo 6: partially filled inlet of DRC1



Photo 7: Outlet of DRC1



Photo 8: onstream impoundment, P1, with Berm on right side of photo



Picture 9: Inlet of outlet of P1



Photo 10: Outlet of P1



Photo 11: Inlet of C1



Picture 12: Outlet of C1, cars used to stabilize the fill



Photo 13: C2 inlet



Picture 14: C2 outlet, blocked by brush and an old car is used to stabilize fill associated with crossing



Picture 15: C3 inlet, scour around inlet evident



Picture 16: C3 outlet