Inspection Report

Site: **Valentino Dimi, Intrex Enterprises LLC**
Inspection Date: **12/20/2018**

Property Information

County: Humboldt
Physical Address: 2929 Thomas Road, Miranda, CA
Coordinates: 40.20425, -123.88576
Assessor's Parcel Number: Humboldt County APN 212-022-013
Owner: Intrex Enterprises LLC
Mailing Address: 1685 N 29th Ave Ste 1-508, Phoenix, AZ 85053
Size (acres): 200 acres
CIWQS Place ID: 842861

Site Operator Information

Discharger: Valentino Dimi WDID No: 1B161185CHUM
Mailing Address: 3400 Redwood Drive, Ste/Apt: #1521, Redway, California, 95560
Size (acres): 200 acres

Inspection Information

Date/Time: 12/20/2018 Inspection Type: Consent
Attendance:
North Coast Regional Water Quality Control Board (Regional Water Board): Adona White
California Department of Fish and Wildlife (CDFW): Brad Padilla and David Manthorne
Humboldt County Environmental Health Hazardous Materials (HazMat): Shannon Townsend-Bettis
California Department of Forestry and Fire Protection (CalFire): Tim Meyers and Lucas Titus
Timberland Resource Consultants (TRC): Jesse Cahill
Property representative: Angel

Inspection Report Information

Prepared by/Date: Adona White, 1/25/19
Reviewed by/Date: Diana Henrioulle on January 29, 2019
Photograph/Imagery Source(s): Photos taken by Adona White on December 20, 2018
CIWQS Inspection ID: 34901703

Inspector's Signature

Adona White, PE, Water Resource Control Engineer

Watershed Setting

Watershed: South Fork Salmon Creek and unnamed tributaries, Salmon Creek, South Fork Eel

Cal Water 1111.130202; HUC 12 180101060404; HU/HA/HSA 111.13; Eel River Hydrologic Unit; South Fork Eel Hydrologic Area, Weott Subarea (Table 2-1, Water Quality Control Plan for the North Coast Region)

Clean Water Act Section 303(d) Listings:

The South Fork Eel River Watershed is Clean Water Act section 303(d)-listed due to impairment and/or threat of impairment to water quality by sediment and temperature:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/tmdls/303d/pdf/150710/02_FinalNorthCoastRegion_2012_303dList.pdf

TMDLs (if/as applicable): EPA adopted TMDL for sediment and temperature in the South Fork Eel River 16 December 1999, available for download at: https://www.waterboards.ca.gov/northcoast/water_issues/programs/tmdls/eel_river_south_fork/pdf/eel.pdf

TMDL Implementation:

To control sediment waste discharges and restore sediment impaired water bodies, the Board adopted the *Total Maximum Daily Load Implementation Policy Statement for Sediment Impaired Receiving Waters in the North Coast Region*, also known as the Sediment TMDL Implementation Policy, on November 29, 2004, through Resolution R1-2004-0087. The Sediment TMDL Implementation Policy directs the Executive Officer to use "all available authorities, including existing regulatory standards and permitting and enforcement tools, to more effectively and efficaciously pursue compliance with sediment-related standards by all discharges of sediment waste." The goals of the policy are to control sediment waste discharges to impaired water bodies so that the TMDLs are met, sediment water quality objectives are attained, and beneficial uses are no longer adversely affected by sediment.

To attain and maintain the water quality objectives for temperature, the *Policy for Implementation of the Water Quality Objective for Temperature in the North Coast Region* (Temperature Implementation Policy), through Resolution R1-2014-0006, directs the Regional Water Board to implement programs and collaborate with others to prevent, minimize, and mitigate temperature alterations associated with certain

activities, including, but not limited to, activities that result in either the removal of riparian vegetation that provides shade to a waterbody, sediment discharges, impoundments and other channel alterations, reduction of instream summer flows, and/or reduction of cold water sources.

The Eel River temperature TMDL assigned temperature load allocations corresponding to solar radiation loads that occur when riparian vegetation is at full potential growth conditions. With the goal of establishing actions that achieve those TMDL load allocations, the Basin Plan *Action Plan to Address Elevated Water Temperatures in the Eel River Watershed* identifies implementation actions. On non-federal lands, parties conducting activities associated with agriculture that discharge waste or have the potential to discharge waste shall implement riparian management measures that meet the riparian shade load allocations (shade consistent with full potential vegetation conditions) and water quality standards.

Property Background

Ownership: According to ParcelQuest, the Property transferred from Ronald Lintzler to Intrex Enterprises LLC on October 7, 2014, for $749,000.

According to the California Secretary of State webpage, there is no LLC registered in California under the name Intrex Enterprises.

Site Development:

There is no record of Regional Water Board permitting/regulatory oversight of site development.

According to personal communications with CalFire representatives during the site inspection, in 2016 CalFire issued a notice of Forest Practice Act violation to the Property representatives for conducting illegal timber harvesting and pushing fill into a watercourse and associated riparian setback. Subsequently, the Property representatives implemented mitigations, including replanting the riparian area, and obtaining a legal conversion authorization in an area that serves as a cultivation area (CAD on Figure 3). It appears that the Property representatives then may have expanded some of the cultivation areas. There are numerous cleared, graded areas, and an extensive road network, totaling much more than one acre.

Applicable programs: Land disturbance of an acre or more should have coverage under the State Water Resources Control Board's Construction General Stormwater Permit (CGP). An approved Water Quality Certification is required in addition to waste discharge regulatory coverage prior to performing any work in surface waters.

Site Operations:

Effective August 8, 2016, the Property is enrolled as a Tier 2 site under Order R1-2015-0023 (Regional cannabis Order), through TRC's approved third party program, with WDID NO. 1B1611845CHUM. The Regional Water Board received a 2017 annual monitoring report for the Property on March 8, 2018.

Applicable programs: 1) Construction General Permit for cumulative disturbance of more than 1 acre. 2) Water Quality Certification for instream work. 2) As of February 15, 2016, Regional cannabis cultivation waste discharge regulatory order for cannabis cultivation and associated activities (R1-2015-0023). By July 1, 2019, State cannabis cultivation order (DWQ-2017-0023).

Site Development Summary and Maps

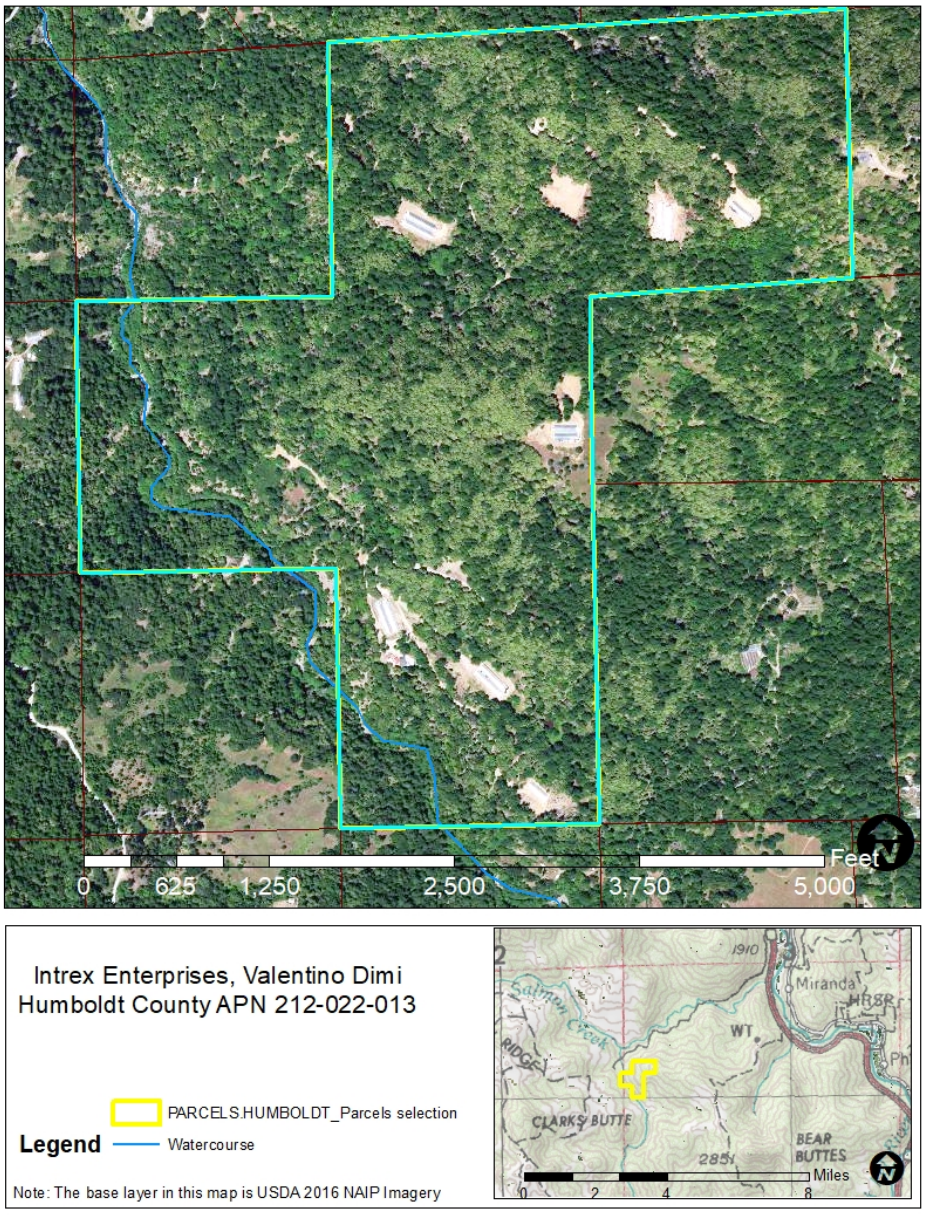

Figure 1. Property location map.

The Property (Figure 1) is located on the South Fork of Salmon Creek, a Class I tributary to South Fork Eel River; Salmon Creek enters the South Fork Eel near Miranda. Land use in the surrounding area includes rural residential, cannabis cultivation, and timber. An access driveway leads to the Property from Thomas Road. Figure 2 shows the Property as of October 2018, imagery courtesy of Humboldt County.

Upon request, TRC provided me with a WRPP, dated February 3, 2017 (Attachment 1). The WRPP provides a site map (Figured 3 and 4) showing roads, watercourses, and features relevant to water resources. The WRPP provides the results of the Property assesment relative to the standard conditions in the Regional cannabis order and provides a table ("mitigiation report") detailing feature-specific corrective actions necessary to bring the Property into conformance with those standard conditions, including a treatment priority and schedule.

The Property has several developed areas and an access road system, 10 cultivation areas (CA A-K), including both indoor and greenhouse cultivation, residences with human waste generation, deisel powered generators with fuel storage and use, wells and water storage and use.

Below, Table 1 describes the features I observed during the inspection and discusses identified water quality concerns. The inspection team evalauted the maps and descriptions in the WRPP. I describe features relevant to water quality (WQ1 through WQ10) on Figure 4 and Table 1, and provide the corresponding WRPP site numbers for reference. Additional narrative regarding site observations is provided in the photo captions provided in the photo log and Figures 5-145.

The WRPP identified numerous issues associated with potting soil disposal and fuels handling throughout the property, including use of the drain plugs on secondary containment. I observed large piles of potting soil and evidence of inadequate diesel fuel storage and handling practices in numerous locations throughout the Property. Many improperly covered/contained piles of potting soils were eroding and transporting and threaten delivery to surface waters. The WRPP identifies numerous road drainage-related threatened and actual sediment discharges. Generally, the WRPP appears to be comprehensive at identifying these features, however ongoing uses continue to degrade roads and concentrated road runoff transports and delivers significant amounts of sediment. The WRPP did not identify geologic concerns on the Property. However, on the slope between CAC and CAD, I observed evidence of trees with corrective growth, and significant legacy and recent impacts to the surface water network and ongoing instream erosion. I believe that the area should be evaluated by an appropriately licensed geologist. It is unclear to this inspector why the Property was enrolled in Tier 2 of Order R1-2015-0023 as there are several individual and cumulative conditions that pose immediate threats to water quality and warrant cleanup and resotration and, upon evaluation, should have warranted a Tier 3 enrollment.

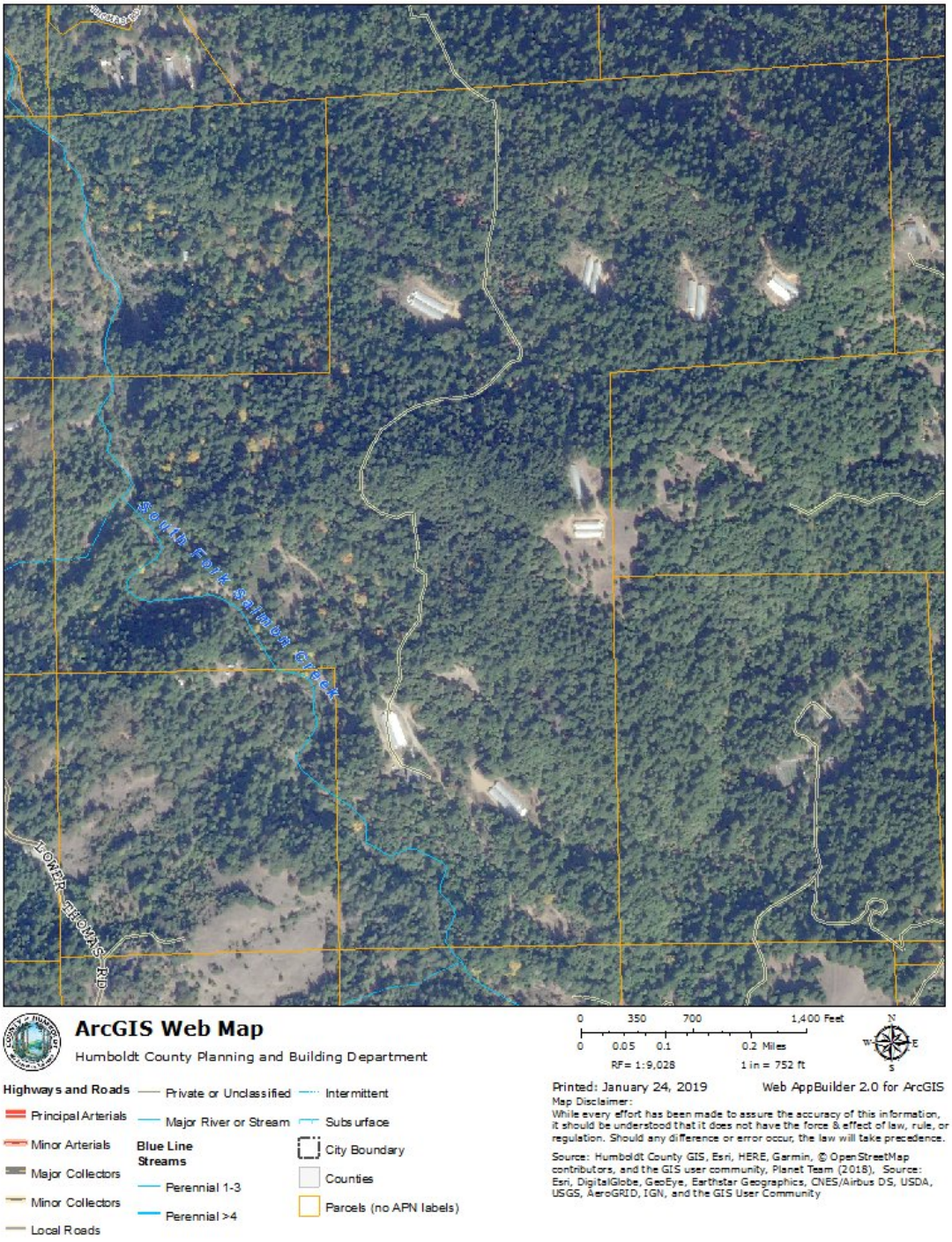

Figure 2. Aerial imagery representing conditions in October 2018.

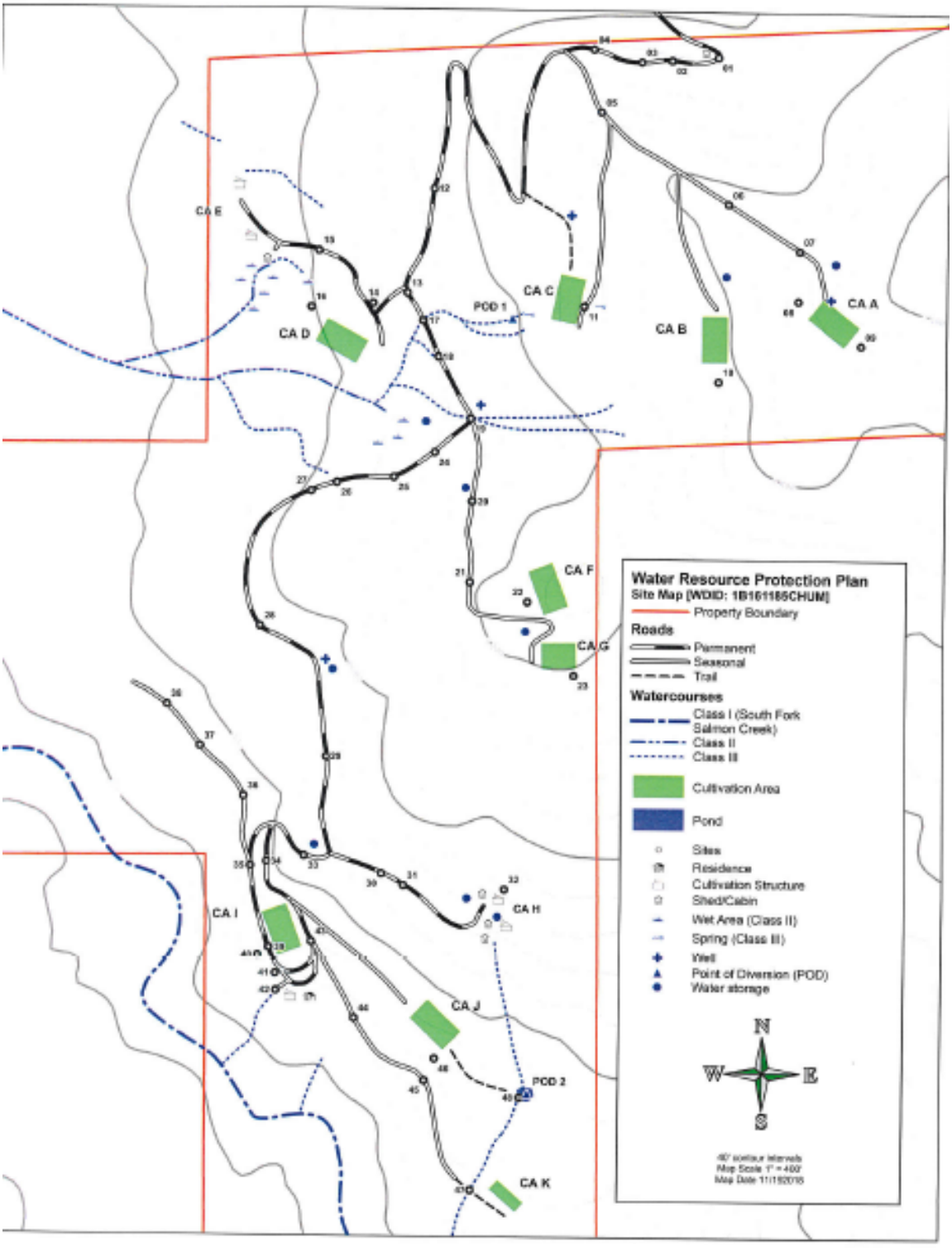

Figure 3. Site map from WRPP.

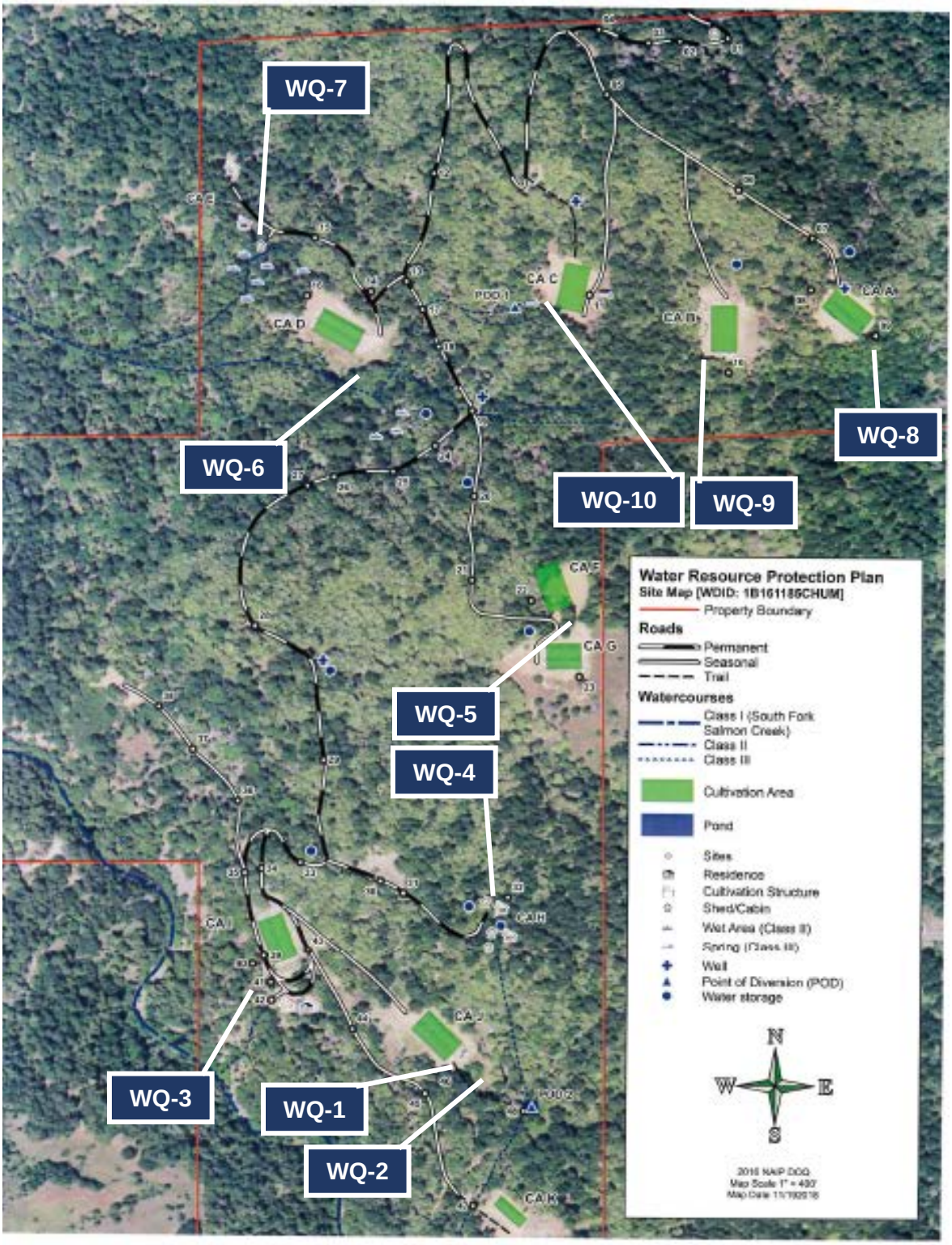

Figure 4. Site map from WRPP with water quality inspection points corresponding to descriptions in Table 1.

Inspection Point	*Description*	*Water Quality Concern*	*Associated Photo(s)*
WQ-1 (CAJ)	At south end of cultivation area J, a road continues to the south east. Two generators are sitting on recently disturbed soil and native soil is placed over potting soil spoils that are dumped over the outboard edge of the roadway. On the surface of the freshly disturbed earthen material, water has pooled in depressions, and I noted a bit of sheen on pooled water.	Potential petroleum release to environment	Figures 5-14
WQ-2 CAK	Large pile of soil and cultivation waste. No evidence of soil movement through the adjacent watercourse buffer, but given proximity to surface waters, there is potential for delivery over time. Site 47 - Decommissioned watercourse. The excavated channel looks big and bare but does not show signs of significant erosion or sediment transport. CAK and POD 2 are dismantled and do not appear to pose significant a water quality concern.	Reduced shade on watercourse in temperature-impaired waterbody	Figures 15-26
WQ-3 Residence CAI	Back side of residence: Blackwater line from the house discharges down to surface water. Pile of potting soil and perlite on a steep slope, with evidence of movement down the slope and delivery to a Class III watercourse. Roads coalesce from the bowl and drain to the north of the house; significant stormwater is routed here and has formed a gully as it pours through the developed area and over a steep slope with delivery to a Class III watercourse.	Sediment, Potting soil, fuel, and human waste discharges to surface waters.	Figures 27-54

	Fuels located above the bowl appeared to be poorly handled, and a spill would readily be entrained in and transported by road runoff flowing down the slope to the Class III watercourse. I observed recently installed wattles that appear to be helping to reduce runoff velocity, but the current stormwater and sediment controls are not adequate to control erosion and sediment transport/ delivery to receiving waters. Cultivation area I is a greenhouse on an earthen cut/fill pad. Road drainage concentrates and discharges to the cut bank of the flat, eroding and more readily transporting any cultivation-related products down to the wattles, gully, and Class III watercourse.		
WQ-4 CAH	At this location is the upper indoor cultivation operation, consisting of a generator shed, fuel storage tank, two 2-story indoor cultivation buildings, and a shed building. The infrastructure is built into the hillside, with a significant cut bank behind the generator shed and the shed building, at the head of a Class III watercourse (same Class III that had the crossing decommissioned (site 47)). The indoor cultivation buildings had wooden chutes for cultivation waste from the upper level and there were large mounds of cultivation waste on the ground below the chutes. I observed freshly-spilled red-dye diesel on the concrete floor, apparently resulting from poor handling of fuel transfers. The access road to this site is steep and shows signs of surface erosion and sediment transport. Earthen fill is sidecast and placed on plastic tarping in at least one location.	Potential petroleum release to environment. Sediment, Potting soil, fuel, and cultivation waste discharges to surface waters.	Figures 55-77

WQ-5 CAF and CAG	Upper cultivation areas CAF and CAG have been dismantled, but potting soil piles remain uncovered. Earthen material has eroded from the fill slopes, forming a gully, and moving down slope, mingled with potting soil and perlite. There does not appear to be delivery to surface waters. The access road is not suitable for winter use.	Sediment and potting soil waste discharges to surface waters.	Figures 80-89
WQ-6 CAD	The road to this location crosses two watercourses at sites 17 and 19. At Site 19, the watercourse channel is gullied deep and wide, both above and below the road, likely as a result of past logging and road-related impacts. At Site 17, the watercourse is brushy and steep, with springy areas with chain fern. The watercourses converge and form a wetland/surface water complex. The area was likely impacted by past earthwork. Site 14 has fuel and generator storage, and the road surface is torn up. A steep spur road goes down to CAD, adjacent to the watercourse with Site 17. CAD is constructed on a landing This cultivation area was constructed in 2016 without a conversion permit (according to CalFire). Development of this area included removal of trees, soil disturbance with heavy equipment to level the ground, and placement of earthen fill into the watercourse on the outboard edge of the landing. As noted above, CalFire issued a notice of violation, requiring, in part that the area be replanted. The replanting appeared to be successful with respect to density/viability of plantings, but I observed unstable sections along the watercourse banks. In addition, the road to this area is poorly drained,	Sediment, potting soil, fuel, and cultivation waste discharges to surface waters. Reduced shade on watercourse in temperature-impaired waterbody	Figures 90-107

	and represents a continuing source of erosion and sediment delivery.		
WQ-7 CAE	At this inspection point is the lower indoor cultivation area. Concentrated road drainage and sediment discharge to wetland/sag ponds via a gully, with the potential to transport fuels and cultivation waste. I observed wattles in this area, that appear to be helping to control sediment, but are not adequate to fully control erosion and sediment transport/delivery from this area. As with the upper indoor cultivation area, cultivation waste is ejected via a chute from the upstairs of two 2-story buildings and has accumulated in large piles outside of the buildings. Fuel storage/handling practices did not appear to be adequate to prevent spills/leaks from occurring in locations where they may enter or be transported into receiving waters. Roads through the building increase the threat of transport of waste from the indoor cultivation operations to surface waters.	Potential petroleum release to environment. Sediment, Potting soil, fuel, and cultivation waste discharges to surface waters.	Figures 108-120
WQ-8 CAA	CAA is an earthen cut/fill pad with a former cannabis cultivation area. Though cultivation has ceased, uncovered potting soil remains. I observed a cut bank failure that likely occurred at the seep identified in the WRPP. The WRPP also identifies a nearby feature (site 9), where cultivation soil and soil bags had been discarded over the edge of the graded area onto steep slopes. I did not observe the bags. I did observe cracks and slumping of the fillslope, and potting soil that had been pushed or placed over the edge of the fillslope.	Potential sediment and potting soil discharges to surface waters	Figures 121-128

	I also observed earthen spoils associated with pad construction that had been pushed out beyond the edge of the pad and is not stabilized. The potential for transport/delivery to receiving waters at this location appeared to be relatively low, as the surrounding forest vegetation provides roughness and filtration.		
WQ-9 CAB	The road to CAB is steep and the surface has wheel ruts indicating heavy winter use. Rills have formed in the fill slope. Some straw has been placed. I observed greenhouses with potting soil in beds and no cover. The WRPP also identifies a nearby feature (site 10) where cultivation soil and soil bags had been discarded over the edge of the graded area onto steep slopes. I did not observe the bags.	Potential sediment and potting soil discharges to surface waters	Figures 129-134
WQ-10 CAC	CAC is an earthen cut/fill pad with a former cannabis cultivation area. The WRPP identifies seeps in both the cut bank and just below the fill slope, as well as the head of a Class III watercourse (associated with the crossing at site 17). The cut slope is near vertical, and the fill appears to have inadequate compaction and is cracking along the southern portion and has eroded to and delivered into the Class III. I observed an uncovered pile of potting soil showing signs of erosion and transport/delivery into the same Class III watercourse. I observed straw and wattles installed in this area, but not sufficient to prevent sediment discharge.	Sediment and potting soil waste discharges to surface waters.	Figures 135-145

Summary (Water Code Section 13276(b), Water Quality Requirements)

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

a. Site Maintenance, Erosion Control and Drainage Features: The road system is native-surfaced and is not adequately drained and surfaced for winter use/traffic, which appears to be heavy. Developed features lacks adequate drainage. Graded surfaces appear have been developed over a couple of entries with heavy equipment, some with expansion. I observed cut bank slumps and cracks on fill edges in multiple locations. The February 4, 2017, water resource protection plan (WRPP) by TRC identifies numerous road points with erosion and runoff issues. My observations suggest that the WRPP has not been implemented and the erosion issues have remained or worsened.
b. Stream Crossing Maintenance: There are two culverted stream crossings, Sites 17 and 19, that the WRPP has identified as undersized. Site 19 appears to be functioning adequately at present. Site 17 is eroding, with hydrologically connected roads discharging sediment into the crossing. The crossing at Site 47 has been decommissioned.
c. Riparian and Wetland Protection and Management: the lower cultivation area (CAX) encroaches on a Class II watercourse and wetland complex. The landing was built in a manner that involved pushing fill into the watercourse. Though Property owner and/or tenants subsequently replanted the area in response to the 2016 CalFire NOV, there is still earthen fill at locations where it may enter or be transported into the watercourse.
d. Spoils Management: A spoils pile of earthen material is located at WQ-1; the pile was never stabilized but appears to not be transporting through the vegetated buffer. There are several locations on the Property where earthen spoils have been placed in a manner and location where road drainage is eroding and transporting the earthen spoils. There are uncovered, unstabilized potting soil spoils piles throughout the property. Some of these piles show signs of erosion and transport/delivery towards or into surface waters.
e. Water Storage and Use: There were three wells on the Property, as well as water storage tanks. We observed no water quality issues associated with water storage and use.
f. Irrigation Runoff: AT WQ-3, the road runoff is directed into the cultivation area CAI and can readily transport pollutants from the cultivation area to the gully and discharge surface waters.
g. Fertilizers and Soil Amendments: As noted above, I observed significant amounts of uncontained potting soil with perlite, and a number of areas where this material has eroded and moved towards/into receiving waters.
h. Pesticides/Herbicides: We did not observe or review pesticide storage/use.
i. Petroleum Products and Other Chemicals: As noted above, there were several locations where fuel was stored, handled, or used in a manner that is not protective of water quality, including the generator sheds at CAH and CAE, and the fuel storage in the vicinity of the residence at CAI.

j. Cultivation-related Wastes: As noted above, I observed several locations where cultivation-related wastes had been placed or piled in a manner that is not protective of water quality. In addition, the WRPP identifies areas of past cultivation-related waste disposal that we did not observe during the inspection, so were unable to confirm whether they had been corrected.

k. Refuse and Human Waste: As noted above, I observed a blackwater pipe extending from the residence at CAI down a steep hillside where it discharges onto the hillside and a black, foul-smelling waste plume extends down to a watercourse below site 42.

Recommendations

1. Immediately implement corrective actions, as described in the WRPP, to improve Property compliance with the standard conditions of the Regional cannabis order. On November 28, 2018, Regional Water Board staff received a copy of the WRPP, marked “Draft,” and dated February 4, 2017 (Attachment 1). The measures described in the February 4, 2017, WRPP will not ensure full compliance with standard conditions, but will serve as a significant step towards compliance. The additional recommendations provided below should assist in bringing the site more fully into compliance with the standard conditions. Interim and corrective measures need to be seasonally appropriate and conducted any applicable permits.

2. Immediately stabilize potting soil throughout the property with tarp cover and perimeter controls.

3. Immediately implement hand-work and erosion control winterization measures to prevent and minimize sediment discharges to surface water associated with concentrated runoff, including road surface and gully erosion. Velocity in ditches could be slowed to minimize scour, treat the outlets to trap sediment and prevent it from discharging to surface waters. (WQ-3, WQ-4, WQ-5, WQ-6, WQ-7, WQ-9)

4. Immediately, implement measures to properly contain, clean up, and dispose of fuels. We anticipate that Humboldt County Hazardous Materials will be in contact with the owner/operator and provide directions which Water Board staff anticipate will address water quality concerns. (WQ-1, WQ-3, WQ-4, WQ-6, WQ-7)

5. Immediately develop interim measures to cease discharge of human and domestic waste water discharge to surface waters. Work with Humboldt County Environmental Health and Planning and Building Departments to establish acceptable short and long-term human/domestic waste disposal systems. (WQ-3)

6. Gather and dispose of cultivation waste. Remove plastic. Do not burn or bury plastic waste on site. (WQ-4, WQ-7)

7. Workplans

a. Conduct additional assessments to address the water quality features and associated recommendations as identified in this report, including the controllable sediment discharge sites identified (WQ-1, WQ-3, WQ-4, WQ-5, WQ-6, WQ-7, WQ-8, WQ-9, WQ-10) and the riparian areas where shade over the watercourses has been reduced (WQ-2, WQ-6).

b. Treatment plan and schedule: Prioritize and implement the treatment measures in the shortest time-frames possible.

c. Provide the results of the assessments and treatment plans to the Regional Water Board. The landowner may choose to

   i. Submit the results of the assessment and proposed treatment schedules as updates to the WRPP, including cleanup and restoration measures. Or,

   ii. Immediately transition enrollment into the statewide cannabis regulatory order, Order No. WQ 2017-0023-DWQ (CANGO) (Tier 2, High Risk) and provide the assessments and treatment plans consistent with, and according to the schedule, as required by that order. This includes but is not necessarily limited to the minimum components listed in CANGO, Attachment D, Site Erosion and Sediment Control Plan Pages D-4 and D-5; the minimum components listed in CANGO, Attachment D, Disturbed Area Stabilization Plan Pages D-9 and D-10; and the minimum components listed in CANGO, Attachment D, Site Management Plan Pages D-1 thru D-3. Ensure that these reports specifically address the recommendations provided in the table above.
   The State Water Board's Order NO. WQ 2017-0023-DWQ (CANGO) can be found at:

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

d. Permitting: Submit to Adona.White@waterboards.ca.gov a workplan for all proposed restoration and/or development work in streams and wetlands. Include information in the workplan demonstrating avoidance of disturbance to wetlands and watercourses, where possible; minimization of impacts where avoidance is not possible, and mitigation of all temporal and permanent losses to stream and wetland function and value associated with site development and restoration activities. Upon Regional Water Board approval, incorporate the workplan into an application for Clean Water Act section 401 water quality certification. Submit the 401 application by no later than March 1, 2019, to ensure adequate review time and authorization to accomplish necessary instream work during the summer of 2019.

8. 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. For more information about Water Board permits that may apply to proposed site development or land use activities, refer to this link:

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.

Inspection Photo Log

WQ-1, CAJ:

Figure 5. Inspection route for southern portion of property.

Figure 6. Cut bank at Cultivation Area J (CAJ); cultivation consists of a greenhouse with light deprivation tarp. CDFW measured the cultivation area at 0.34 acres. The WRPP identifies the adjacent slopes as 25-40%.

Figure 7. The outboard edge of the landing at CAJ is also a road. The WRPP identifies that the road terminates north of CAJ and a trail south of CAJ. However, we observed it continuing to the south as a road, not a trail.

Figure 8. At the south end of CAJ, I observed a freshly graded area with two generators on it, covered in tarps.

Figure 9. Generators located at CAJ.

Figure 10. One of the generators had petroleum product drips on the trailer.

Figure 11. At the south end of the outboard edge of the landing at CAJ, I observed potting soil spoils placed over the edge of the landing, with native earthen material placed on top.

Figure 12. At the south end of the outboard edge of the landing at CAJ, I observed potting soil spoils placed over the edge of the landing, with native earthen material placed on top. The WRPP identifies this location as Site 46, and due to the presence of a cutbank seep downslope, recommends discontinuing placement of soil bags and cultivation waste, collection and disposal of waste, and stabilization with seed and straw. I did not note any plastic bags nor seed and straw. Rather, it appeared that the area was covered in native soil.

Figure 13. Tire ruts were evident on the native road surface. The road surface is inadequate for winter use. I observed a slight sheen on the surface of water that was pooled in the ruts.

Figure 14. Tire ruts were evident on the native road surface. The road surface is inadequate for winter use. I observed a slight sheen on the surface of water that was pooled in the ruts.

Figure 16. South of CAJ, I observed another two generators that were recently placed and are uncovered. Native soil was disturbed in the placement and had not been stabilized.

Figure 15. A road extends south of CAJ; it is identified as a trail in the WRPP.

Figure 17. Down the road south of CAJ an area was freshly disturbed and staged for storage. The tractor, presumed to have been used to move earthen material, was located here.

Figure 18. Tractor located on road south of CAJ.

Figure 19. The cultivation area CAK and stream crossing at site 45 have been decommissioned. The photo shows the crossing at Site 45, looking downstream from left bank. Note the logs remain in a stack on the site.

Figure 20. Decommissioned crossing at Site 45, looking downstream. The WRPP indicates that the earthen ford Class III crossing was pulled per an approved LSAA agreement. The Regional Water Board has no record of submission of an instream workplan or 401 application for the instream work. The crossing appears to have stabilized but lacks evidence of replanting or regrowth.

WQ-2:

Figure 21. South of CAJ, cultivation waste is placed on the hillside along with earthen spoils.

Figure 22. South of CAJ, upslope of the road, cultivation waste is placed on the hillside along with earthen spoils. The spoils are not stabilized. The riparian area along a class III watercourse is comprised of native forest.

Figure 23 South of CAJ, upslope of the road, cultivation waste is placed on the hillside along with earthen spoils. The spoils are not stabilized. The riparian area along a class III watercourse is comprised of native forest.

Figure 24. View down to class III and associated riparian buffer conditions.

Figure 25. Class III watercourse, looking upstream, approximately at POD 2. POD 2 appears to have been dismantled. Note that the WRPP identifies a pond at site 48, however we did not observe the feature during the inspection.

Figure 26. Waterline is located adjacent to the watercourse near the dismantled POD2.

WQ-3

Figure 27. Inspection route of area associated with WQ-3 description in Table 1.

Figure 28. Concentrated road drainage is directed off the road surface via a drain-out and has eroded a gully (WRPP site 44).

Figure 29. The water from site 44 has formed a gully that extends downslope and is eventually dissipated by some downed trees.

Figure 30 Blackwater from the residence is discharged onto the hillside below the residence and has stained the leaflitter black along its plume, which smells of sewage, and extends downslope and has discharge to a class III watercourse which is tributary to South Fork Salmon Creek.

Figure 31. Blackwater from the residence is discharged onto the hillside below the residence and has stained the leaflitter black along its plume, which extends downslope and has discharge to a class III watercourse which is tributary to South Fork Salmon Creek.

Figure 32. Cultivation waste is placed over the break in slope.

Figure 33. Potting soil pile placed below the residence is not stabilized and is eroding, transporting, and at least threating to deliver to watercourses downslope along with the blackwater.

Figure 34. Potting soil pile placed below the residence is not stabilized and is eroding, transporting, and at least threating to deliver to watercourses downslope along with the blackwater.

Figure 35. Perlite is transported from soil pile and over the edge of the break in slope to comingle with the blackwater.

Figure 36. Generator located near the residence is not covered,

Figure 37. Shed built into hillside below residence.

Figure 38. Residence.

Figure 39. Feed tank at residence.

Figure 40. Storage shed at residence.

Figure 41. Cultivation waste placed over break in slope at residence.

Figure 42. The residence is located in a bowl landform and road drainage from both north and south concentrate water between the cultivation area CAI, and fuels storage and the residence (WRPP site 42). The concentrated water extends downslope and has delivery to a Class III watercourse. Wattles were recently installed and have certainly improved the conditions by slowing the water flow and reducing the resulting ongoing scour.

Figure 43. The residence is located in a bowl landform and road drainage from both north and south concentrate water between the cultivation area CAI, and fuels storage and the residence. The concentrated water extends downslope and has delivery to a Class III watercourse. Wattles were recently installed and have certainly improved the conditions by slowing the water flow and reducing the resulting ongoing scour.

Figure 44. The residence is located in a bowl landform and road drainage from both north and south concentrate water between the cultivation area CAI, and fuels storage and the residence. The concentrated water extends downslope and has delivery to a Class III

watercourse. Wattles were recently installed and have certainly improved the conditions by slowing the water flow and reducing the resulting ongoing scour. Note grass growth, suggesting the WRPP recommendation for seeding was at least partially implemented.

Figure 45. Gully at site 42 appears to have resulted in the headward incision of and delivers to a class III watercourse.

Figure 46. Upslope of the gully at site 42, the WRPP identifies site 41 as a 1000-gallon fuel tank with unplugged secondary containment and no cover.

At the time of the inspection, a tarp had been placed over the tank.

Figure 47. From the fuel tank, a line extends toward the residence. There is no valve at the end of a long hose, suggesting that fuels in the line might be released.

Figure 48. Two generators located at the residence.

Figure 49. The gully at the residence (site 42) is fed by water entering the area via four different road segments and the cultivation area CAI. This photo shows the north eastern road, with concentrated drainage going down the road and into the cultivation area CAI. The south eastern road (upper left of photo) brings runoff to site 42 also.

Figure 50. Road segment bringing water from the east to the head of the gully.

Figure 51. The road drainage from the north east is eroding spoils of earthen material above the cultivation area CAI, which is constructed on a cut and fill flat below the northern road.

Figure 52. Road drainage enters the cultivation area CAI from the cutbank above, has caused cutbank erosion and brings water into the cultivation area, with the potential and likelihood of transporting pollutants from the cultivation area to the gully with delivery to surface waters.

Figure 53. The concentrated water leaves the cultivation area CAI and delivers to the gully and surface waters.

Figure 54. The western road enters the residence area from the north, downslope of CAI and the fuels storage, at the head of the gully.

WQ-4, CAH, Upper Indoor Cultivation Area

Figure 55. Inspection route of WQ-4: CAH and associated features.

Figure 56. Earthen spoils pushed onto of light deprivation plastic tarp.

Figure 57. Surface erosion transport.

Figure 58. The upper most building at CAH is a generator shed and is built against a cut bank.

Figure 59. The back corner of the building is not attached to the perimeter concrete foundation.

Figure 60. The generator shed is not attached to the foundation along the back side of the building. Below the generator shed are two 2-story indoor cultivation facilities. I did not view the interior of the indoor cultivation buildings.

Figure 61. The front of the generator shed has sliding doors that open to an access driveway. This portion of the

driveway is rocked and slopes toward the head of a Class III watercourse.

Figure 62. The landowner representative opened the generator shed, where there were three large generators. The fuel line from the storage tank to the shed had overtopped a tote with a crack in it and spilled over the floor of the shed building. The concrete floor appeared to have contained the spill while we were there.

Figure 63. Tote overflowing and spilling onto floor.

Figure 64. Diesel on floor.

Figure 65. The landowner representative placed absorbent pads in the pool of diesel.

Figure 66. Covered empty fuel storage tank.

Figure 67. The site slopes down toward the head of the Class III with increasing steepness. A waddle is installed. A small building and tank are built in the swale at the head of the class III.

Figure 68. The small building built in the swale of the class III.

Figure 69. The small building built in the swale of the class III.

Figure 70. Tank immediately upslope pf small building in swale.

Figure 71. Exterior of indoor cultivation buildings.

Figure 72. Cultivation waste at head of swale at CAH.

Figure 73. Cultivation waste outside eastern indoor building at CAH.

Figure 74. Each of the indoor cultivation buildings has an upstairs door and "chute" that appears to be used to dispose of cultivation waste outside the indoor cultivation buildings.

Figure 75. Cultivation waste outside of western indoor at CAH.

Figure 76. The upper portion of the road to CAH is not adequately surfaced for the use and is eroding.

Figure 77. Drain out with erosion and transport on upper road to CAH.

Figure 78. Corrugated plastic pipe at site 19.

Figure 79. Well head near crossing at site 19.

WQ-5, CAF and CAG:

Figure 80. Road to CAF and CAG is native surfaced and not suitable for winter usage.

Figure 81. Road to CAF and CAG is native surfaced and not suitable for winter usage.

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Figure 82. Cultivation has been ceased at CAF. A thin layer of straw was spread on slopes.

Figure 83. The fill slope at CAG has slumped and eroded. There appears to be no delivery to surface water. Cultivation at CAH has been ceased.

Figure 84. At CAF, the slump in fill face has formed a gully which appears to fan out on the meadowed hillside below and does not appear to discharge to surface waters.

Figure 85. Uncovered potting spoil pile.

Figure 86. Perlite is transporting through the gully formed in the fill failure at CAH.

Figure 87. The flat at CAH has not been stabilized and the surface is eroding.

Figure 88. Uncovered potting soil is eroding and transporting at CAF.

Figure 89. Landing surface at CAF.

WQ-6, Surface water complex, CAD:

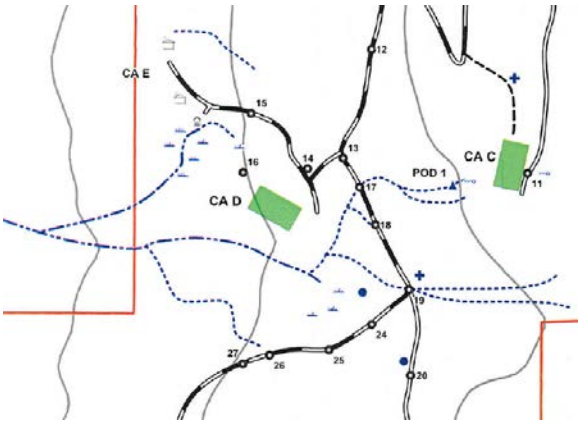

Figure 90. Relevant portion of WRPP map

Figure 91. Site 18 hydrologically connecting a long run of road surface to surface waters.

Figure 92. Site 14 is at the intersection of two roads where a wide developed area is used for fuel and generator storage, with winter vehicular use on unsurfaced roads.

Figure 93. Steep watercourse at upper portion of surface water complex.

Figure 94. portion of watercourse below site 17.

Figure 95. Class II watercourse at landing at CAD.

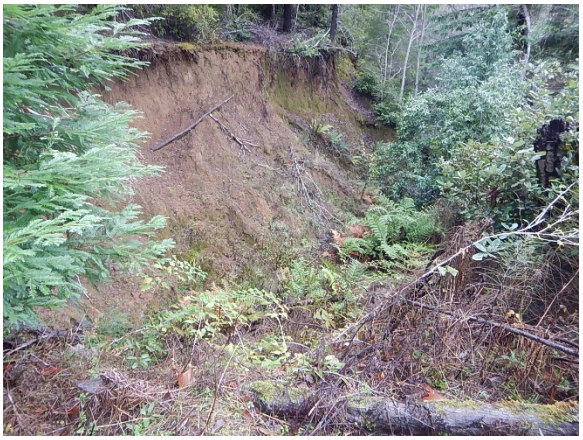

Figure 96. Eroded bank on watercourse adjacent to the landing associated with CAD.

Figure 97. Landing constructed adjacent to watercourse.

Figure 98. Riparian area adjacent to surface water complex appears to be impacted by harvesting and mechanical earthwork at various times and lacks natural site potential shade.

Figure 99. Watercourse downstream of landing at CAD.

A

Figure 100. Landing is constructed along a stretch of gullied watercourse.

Figure 101. Edge of landing at CAD, note stumps from harvest and replanted trees, required mitigation by CalFire.

Figure 102. The landing at CAD appears to remain oversteepened in portions.

Figure 103. Edge of landing at CAD is eroding in some locations and should be stabilized.

Figure 104. View from edge of landing (foreground), the watercourse flows left to right in photo, the right bank lacks shade, though appeared to be replanted, and left bank erosion feature.

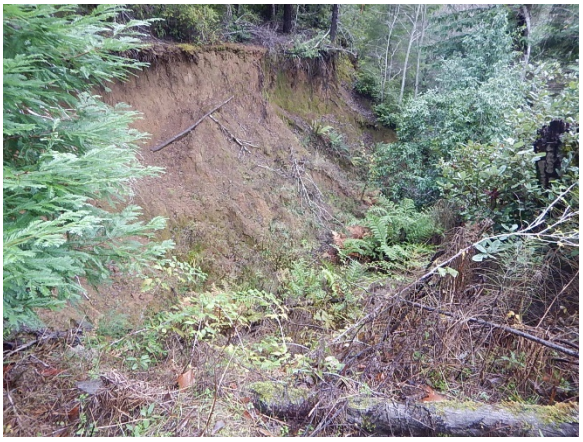

Figure 105. Streambank downstream of crossing at site 19 and just upstream of landing at CAD.

Figure 106. Gullied tributary to surface water complex.

Figure 107. Springy area at top of surface water complex.

WQ-7, CAE, Lower Indoor Cultivation Area

Figure 108. Site 15: Road surface drainage bypasses the drain-out and discharges to surface waters.

Figure 109. Road drainage concentrates down toward indoor, where it discharges to surface waters.

Figure 110. Road is hydrologically connected via gullied channel that connects to surface waters.

Figure 111. Surface waters that receive discharge of stormwater, road-related sediment, and any pollutants picked up from the indoor cultivation area.

Figure 112. Road runoff is routed down past the generator shed and down to the surface waters shown in previous figure. Wattles and straw have been installed and have helped to minimize the sediment discharges but are still inadequate to prevent discharges to surface waters.

Figure 113. Road surface runoff goes down hill to surface water. Straw and wattles have been installed, are helping to slow and trap sediment, but need to be enhanced to improve effectiveness.

Figure 114. CAE is comprised of two 2-story buildings and a generator shed; the road weaves through.

Figure 115. The indoor is built under the trees.

Figure 116. Earthwork has left a berm above the hillslope to the surface waters.

Figure 117. There are several locations where cultivation waste has been mounded high next to the building.

Figure 118. Road runoff from a long stretch of steep road discharges to over edge and flows through cultivation waste.

Figure 119. Road runoff from a long stretch of steep road discharges to over edge and flows through cultivation waste.

Figure 120. Road runoff from a long stretch of steep road discharges to over edge and flows through cultivation waste.

WQ-8, 9, and 10, (CA A, B, and C):

Figure 121. CAA is a cultivation area constructed of cut and fill where cultivation has ceased. Potting soil remains uncovered. A cut bank failure likely occurred at the seep identified in the WRPP.

Figure 122. Fill slope cracks at CAA.

Figure 123. Slumping fill slope at CAA.

Figure 124. A single wattle is laid around the perimeter of the landing at CAA. Slumps.

Figure 125. CAA: Recent fill slope erosion where wattle was not adequate.

Figure 126. CAA: Potting soil over edge of fill slope.

Figure 129. Road to CAB is steep with tire ruts.

Figure 127. CAA fill pushed and adjacent forest conditions.

Figure 130. CAB cultivation area at top of steep driveway.

Figure 128. It appeared that much of the sediment transported from CAA was being trapped.

Figure 131. CAB cultivation area lacks ground cover.

Figure 132. CAB straw has been placed on portions of fill slope.

Figure 133. CAB fill rill.

Figure 134. CAB fill pushed into forest.

Figure 135. CAC, road drainage comes into area and is transporting sediment in a ditch at edge of cultivation area.

Figure 136. CAC. Straw mulch and a perimeter waddle have been installed.

Figure 137. Fill slope is eroding at CAC. Concentrated road runoff, Inadequate

stormwater controls and slope protection have resulted in gully erosion of the fill slope.

Figure 138. Sediment track from CAC transported from eroded fill slope.

Figure 139. Transported sediment from CAC continues to be fine and mucky well below the source area, where it threatens delivery to the watercourse associated with Site 19.

Figure 140. Sediment eroded from CAC transports for a long distance through the forest floor where is connects to a class III watercourse, upslope of crossing site 19. As below the crossing at site 18, the watercourse above the crossing is also gullied, most likely from legacy logging.

Figure 141. View of CAC from slope below.

Figure 142. Gully erosion at CAC

A

Figure 143. Gully erosion at CAC.

Figure 144. CAC fill gully.

Figure 145. Below CAC, drainage had been diverted down skid road at one point.

Figure 146, Third well.