# North Coast Regional Water Quality Control Board

January 23, 2020

Jesus Moreno-Munguia
On Behalf of
Lost Coast Outreach LLC
PO Box 3120
Eureka, CA, 95502

Certified Mail No. 7016 2710 0000 2635 9780

Jesus Moreno-Munguia
On Behalf of
Lost Coast Outreach LLC
PO Box 9107,
Eureka, CA, 95501

Certified Mail No. 7016 2710 0000 2635 9797

Jesus Moreno-Munguia
On Behalf of
Lost Coast Outreach LLC
826 P Street, APT B
Eureka, CA 95501

Certified Mail No. 7016 2710 0000 2635 9803

Dear Mr. Moreno-Munguia:

Subject: **Notice of Violation, Directive to Obtain Regulatory Coverage for Cannabis Cultivation, and Transmittal of Inspection Report for July 2, 2019, Inspection of Trinity County Assessor's Parcel No. 018-230-21-00**

File: Cannabis Inspections, Trinity County, 2019, 190702 Lost Coast Outreach LLC, CIWQS Place ID No. 854510

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
- Federal Clean Water Act (Clean Water Act) Section 301

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.

**Background**

On September 25, 2018, and July 2, 2019, staff from the North Coast Regional Water Quality Control Board (Regional Water Board), accompanied by personnel from the California Department of Fish and Wildlife (CDFW), State Water Resources Control Board Division of Water Rights, and various law enforcement agencies, inspected the subject Property.

The purpose of each 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 are copies of the water quality inspection reports (September 25, 2018, Inspection Report and July 2, 2019 Inspection Report). Please review the inspection reports carefully and completely. The inspection reports contain 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.

**Relevant Requirements**

During both inspections, 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.

**Observed Violations**

As documented in the reports for both inspections, 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-2019-0001-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 the Clean Water Act Section 301 associated with unauthorized dredge/fill in surface waters at the Property locations identified as WQ 9 and WQ 13 in the Inspection Reports. Furthermore, the earthen fill placed in the watercourses at WQ 9 and 13 is a violation of Water Code sections 13260 and 13264 and the Basin Plan Section 4.2.1, Prohibition 1, and the threat of earthen materials at

these locations to continue to discharge to receiving waters represents a violation of the Basin Plan Section 4.2.1, Prohibition 2.

**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 Clean Water Act, 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 or up to $10 per gallon for each gallon over 1,000 gallons not cleaned up, and up to $10,000 per day per violation pursuant to Water Code section 13385.

**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**:

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://public2.waterboards.ca.gov/cgo You must also submit an application fee to the State Water Board within 30 days of submitting the online application. The fee must be submitted to one of the following addresses, based on the method of delivery.

| By U.S. Mail: | In person or by courier delivery: |
|---|---|
| Accounting Office<br>Attn: Water Quality Fees – Cannabis General Order<br>P.O. Box 1888<br>Sacramento, CA 95812-1888 | Accounting Office<br>Attn: Water Quality Fees – Cannabis General Order<br>1001 I Street<br>Sacramento, CA 95814 |

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
Cannabis Waste Discharge Regulatory Program
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

**OR**

3) If you believe regulatory coverage is not required under any of the options listed above, either because **there is no cultivation** or associated activities occurring, 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.
(2) The expiration of 140 days after compliance with section 13260.
(3) The issuance of a waiver pursuant to section 13269.

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.

**Inspection Report Recommendations**

As mentioned above, the September 25, 2018 and July 2, 2019 Inspection Reports provide 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 Brian Fuller of your intentions, plan, and schedule to implement recommendations in the inspection report. Brian Fuller can be reached at (707) 576 2806 or by email at Brian.Fuller@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 Brian Fuller at the phone number or email above. You may also contact me at Diana.Henrioulle@waterboards.ca.gov or by phone 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,

Digitally signed by Diana Henrioulle
Date: 2020.01.23 11:10:11 -08'00'

Water Boards

Diana Henrioulle, P.E.
Enforcement Unit

200123_BMF_dp_Lost Coast Outreach LLC_NOV

Attachments: Attachment A – Regulatory Citations
Water Quality Report of September 25, 2018 Inspection
Water Quality Report of July 2, 2019 Inspection

**cc:** **Department of Fish and Wildlife**
Warden Brendan Lynch, Brendan.Lynch@wildlife.ca.gov
David Manthorne, David.Manthorne@wildlife.ca.gov

**North Coast Regional Water Quality Control Board**
Kason Grady, Kason.Grady@waterboards.ca.gov
Brian Fuller, Brian.Fuller@Waterboards.ca.gov

**State Water Resources Control Board Division of Water Rights**
David Rosas, David.Rosas@Waterboards.ca.gov
Steven Hall, Steven.Hall@Waterboards.ca.gov
Stormer Feiler, Stormer.Feiler@waterboards.ca.gov

**Trinity County**
Sgt. Nate Trujillo, NTrujillo@trinitycounty.org
Deputy D.A. Colleen Murray, CMurray@trinitycounty.org

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:<br><br>(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.<br><br>(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)." |

| Regulatory Section | Citation |
|---|---|
| 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:<br><br>(1) The issuance of waste discharge requirements pursuant to Section 13263.<br><br>(2) The expiration of 140 days after compliance with Section 13260 if the waste to be discharged does not create or threaten to create a condition of pollution or nuisance and any of the following applies: …<br><br>(3) The issuance of a waiver pursuant to Section 13269." |
| 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)." |

| Regulatory Section | Citation |
|---|---|
| California Water Code Section 13376 | "A person who discharges pollutants or proposes to discharge pollutants to the navigable waters of the United States within the jurisdiction of this state or a person who discharges dredged or fill material or proposes to discharge dredged or fill material into the navigable waters of the United States within the jurisdiction of this state shall file a report of the discharge in compliance with the procedures set forth in Section 13260." |
| California Water Code Section 13385 | "A person who violates any of the following shall be liable civilly in accordance with this section:<br>(1) Section 13375 or 13376…(5) A requirement of Section 301…401…of the Federal Clean Water Act…" |
| Federal Clean Water Act Section 301 (a): | Section 301(a) provides that except as in compliance with this section [301] and section 1342 and 1344 of the Clean Water Act, "the discharge of any pollutant by any person shall be unlawful." 33 U.S.C. § 1311(a). The relevant exceptions allowed for under the Clean Water Act are the discharge of dredged and fill material into navigable waters pursuant to section 404 or the discharge of any pollutant to navigable waters from any point source pursuant to section 402 of the Clean Water Act. The Clean Water Act prohibits the discharge of any pollutant from a point source into waters of the United States without a section 402 permit and/or prohibits the discharge of dredge and fill material without a section 404 permit and a section 401 state water quality certification. |
| Federal Clean Water Act Section 401 | Section 401 (a)(1) "Any applicant for a Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may result in any discharge into the navigable waters, shall provide the licensing or permitting agency a certification from the State in which the discharge originates" |

| Regulatory Section | Citation |
| --- | --- |
| Federal Clean Water Act Section 404 | Section 404(a) provides, in relevant part, "The Secretary may issue permits…for the discharge of dredged or fill material into the navigable waters…" The Code of Federal Regulations defines the term "dredged material" as material that is excavated or dredged from waters of the United States. 33 C.F.R. § 323.2(c). The term "discharge or dredged material" mean any addition of dredge material into the waters of the United States. 33 C.F.R. § 323.2(d)(1). The Code of Federal Regulations defines "fill material" as material placed in waters of the United States that has the effect of replacing any potion of a water of the United States with dry land or changing the bottom elevation of any potion of a water of the United States. 33 C.F.R. § 323.2(e)(1). The term "discharge of fill material" means the additional of fill material into waters of the United States. 33 C.F.R. § 323.2(f). |

## North Coast Regional Water Quality Control Board

To: Diana Henrioulle

From: Brian Fuller

Date: February 4, 2019

Subject: Inspection Report for September 25, 2018, Warrant Inspection of Trinity County Assessor Parcel Number (APN) 018-230-21-00

File: Cannabis Program Inspections, Trinity County, September 2018 WET Inspections, CIWQS Place ID 854510.

Property information
County: Trinity

Physical address: 1045 Hale Creek Ridge Rd,
Mad River, CA, 95552

APN: 018-230-21-00

Owner: Lost Coast Outreach LLC
PO Box 3120
Eureka, CA 95502

Size: 74.4 acres

Watershed: Mad River Hydrologic Unit; Ruth Hydrologic Area; (HU/HA/HSA 109.40; Table 2-1, Water Quality Control Plan for the North Coast Region).

Regulatory status with the Regional Water Board
Site Development:

- No record of permitting for site development.

Applicable programs:

- Regional Water Board's Clean Water Act section 401 Water Quality Certification permit for dredge/fill activities in a surface water.

Onsite activities/operations:

- No record of enrollment in any State or Regional Water Board regulatory program.

Applicable programs:

- Regional or statewide cannabis order.
- Waste discharge requirements for discharge of waste to waters of the state.

[Note: this Property did not have a County permit for cannabis cultivation at the time of the inspection.]

Inspection information
Date/time: September 25, 2018
Type: CDFW WET warrant inspection.

Attendance:

Brian Fuller, Engineering Geologist, Regional Water Board
Shannon Utley, Engineering Geologist, Regional Water Board
David Rosas, Environmental Scientist, DIV
Steven Hall, Environmental Scientist, DIV
David Manthorne, Senior Environmental Scientist Specialist, CDFW
Rhett Imperiale, California Department of Forestry and Fire Protection, (CalFIRE)
Seth Toerpe, United States Forest Service (USFS) Law Enforcement Officer.
Lt DeWayne Little, Warden Brendan Lynch and other Law Enforcement personnel from CDFW.

Background/Objective:

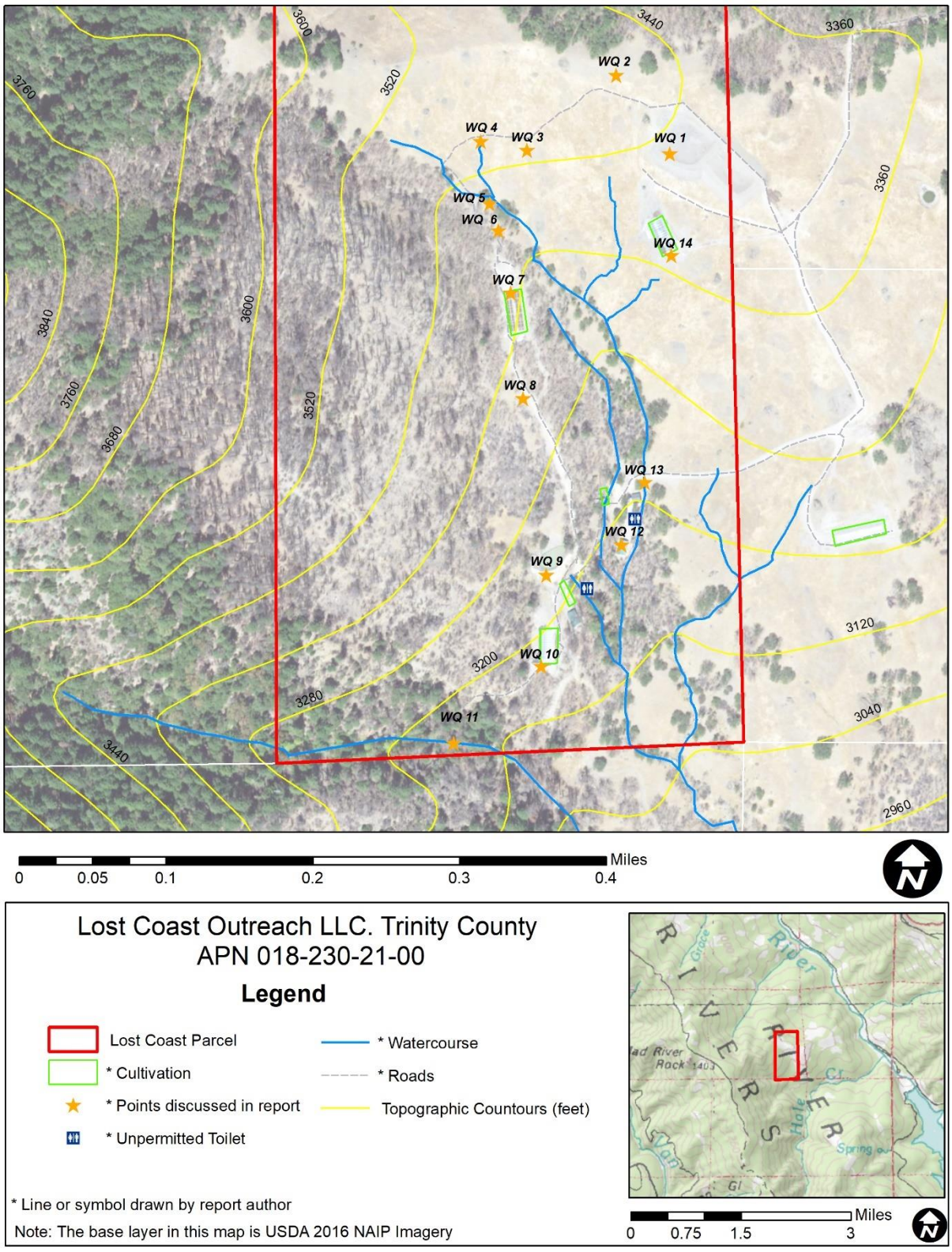
North Coast Regional Water Board (Regional Water Board) staff participated with staff of the California State Water Resources Control Board Division of Water Rights (DIV), California Department of Fish and Wildlife (CDFW), and personnel from various law enforcement agencies on an inspection of Trinity County assessor parcel number (APN) 018-230-21-00, owned by Lost Coast Outreach LLC. 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.

Property ownership:

- Per records from the Trinity County Assessor-Recorder's office, as presented in Land Vision, Lost Coast Outreach LLC purchased the Property from Joseph and Jill Rice on April 29, 2016.

Aerial imagery:
Aerial imagery available on google.com/maps shows evidence of property development on May 28, 2016.

Inspection Map



Inspection Observations

The Inspection Map, above, includes reference points for features of water quality interest discussed below.

We accessed the property along a dirt road from the east and walked west, passing two empty ponds near the ridge-top *(photo 1)*. The ponds, identified as *WQ 1*, had no apparent outlets; however, stormwater is unlikely to overtop and erode the pond berms, because there is no upslope catchment area or surface water connection. We continued walking northwest, past a group of 4 water tanks on the ridge-top *(photos 2 - 3)*, identified as *WQ 2*, and noted rilling on the unvegetated hillslope below the tanks. We then headed west to another cluster of water tanks *(photos 4 – 5)*, *WQ 3*, that were surrounded by uncovered and uncontained fuel, and fertilizers, and located where these pollutants have the potential to be transported 200 feet south to a tributary to Hale Creek.

From the water tanks at *WQ 3*, we followed an ATV trail that crossed a tributary to Hale Creek *(photos 6, 7, and 8)* at *WQ 4, 5, and 6* respectively. We continued south down the ATV trail arriving at a 0.3-acre cleared earthen pad located at *WQ 7*, approximately 50 feet west of a tributary to Hale Creek (*photos 9-11*). Based on a review of available aerial imagery, vegetation removal and soil disturbance associated with development of this area, identified as *Area A* in the below aerial images, occurred between July 10, 2014 and May 28, 2016. I observed water emanating from the ground near the northern edge of *Area A, WQ 7, (photos 9 - 10).* I observed the plant species juncus growing in the saturated ground. In front of a nearby greenhouse, I observed a bag of high-concentration, water soluble fertilizer lying uncovered on bare ground *(photo 11)*.

**Impounded spring *WQ 9***

We exited the southern edge of *Area A*, *WQ 7,* along a dirt road that was covered with a layer of fine, fluffy soil, up to 1.5 inches thick *(photo 12,) WQ 8*. The road is shaped such that stormwater will run down the road surface and deliver to a pond to the south. We continued following this road south, arriving at a pond *(photos 13 - 17), WQ 9*. The pond is bound by the hillslope upstream and an earthen dam downstream. When full, the pond would have a wetted surface area approximating a 100’ long by 60’ wide ellipse, with an approximately 38,000 cubic foot capacity (π x 50’ x 30’ = 4,700 square feet x an average depth of 8’=38,000 cubic feet). Erosion on the inboard face of the dam has exposed poorly consolidated sediment of mixed sizes. The pond outflow is a plastic pipe with an inlet near the dam crest and outlet midway down the dam outboard face. Based on measurements I made using a rangefinder and a tape measure (see figure 1), I determined that the dam is 100 feet wide, with a cross-sectional area of 360 square feet, comprising a total volume of 36,000 cubic feet.

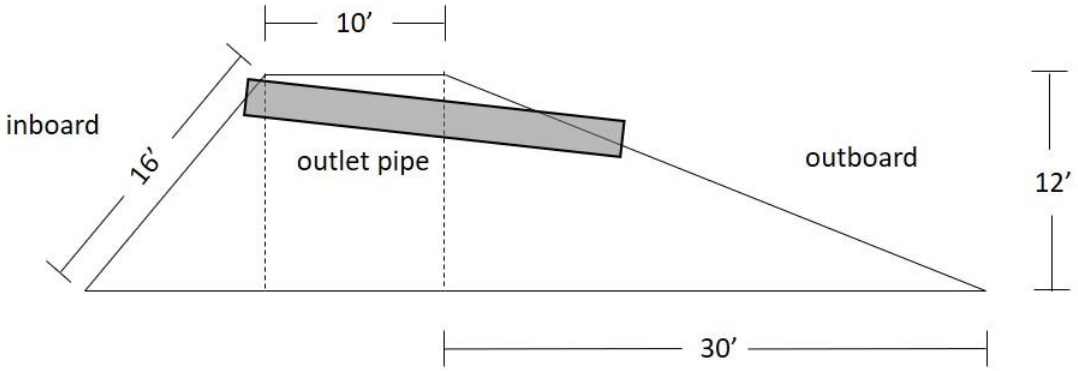



figure 1 – Cross-section of dam located at *WQ 9*.

While I was documenting the pond, Cal Fire Division Chief, Rhett Imperiale, informed me that his family used to own the land, and that he used to visit the area often. He said there used to be a natural spring with a shallow cave where the pond was currently located. Aerial imagery, *Area B* below, shows green vegetation in the middle of the summer in 2012 and outlines of this vegetation in 2014, supporting Mr. Imperiale's description of this feature.

The watercourse immediately downstream from the pond passes under a road through a 24" diameter metal culvert that is more than half filled with sediment *(photo 18)*. Downstream from the road crossing, I observed an earthen fill pad adjacent to the west bank of the channel, with a hoophouse *(photos 18 and 19)*. At the south end of the fill pad, I observed a roadway constructed in the watercourse *(photos 19 and 20)*. Uphill, less than 50' from the watercourse, there is a toilet discharging to ground *(photo 21)*.

We then walked south to another earthen fill pad, at *WQ 10*, cut into the hillslope. We observed loose soil on the access road surface, that appeared to be susceptible to erosion *(photo 20)*. Similar to what we had observed at *WQ 7* on *Area A*, we observed saturated ground and juncus growing in front of the greenhouse at *WQ 10 (photo 23)*. We continued walking south and followed a waterline to a tributary to Hale Creek and observed a dam in the watercourse at *WQ 11* to facilitate a water diversion *(photo 24)*.

We then walked back north to a small group of structures at *WQ 12* which is bound by watercourses to the east and west. These structures included cooking and bathing areas that discharged directly to a tributary to Hale Creek *(photo 25)*, and an area with five 55-gallon drums of chemicals *(photo 26)*. The watercourse west of *WQ 12*, is blocked by a greenhouse *(photo 27),* downstream from which is a crushed 12" diameter culvert, that historically would have directed flows below the road that passes north of the structures. Approximately 130 feet east of the crushed culvert, we observed another culvert crossing that was undersized and perched *(photo 28) WQ 13*. We followed the road 200 feet east of *WQ 13* and observed a segment of road that crossed through the head of an ephemeral watercourse *(photo 29)*.

We eventually returned to the northern portion of the property and walked to the greenhouse at *WQ 14*. Immediately north of the greenhouse, where the flat was cut into the hillslope, we observed sparse vegetation and rilling *(photo 30)*, and erosion on the fill *(photo 31)*. We observed that the southwest portion of the fill pad abuts an ephemeral watercourse that is tributary to Hale Creek *(photo 32)*.

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**: The roads throughout the property are not rocked *(photo 2)*, they show evidence of erosion and/or erodibility, and they drain to tributaries to Hale Creek.

2. **Stream crossing maintenance and improvement**: Roads ford watercourses at *WQ 4, 5, 6, and 29.* Existing culverts at *WQ 9* and west of *WQ 13* are blocked, and the culvert at *WQ 13* appeared to be undersized and perched.

3. **Riparian and wetland protection and management**: A jurisdictional spring and associated wetland at *WQ 9* appears to have been excavated and replaced with an onstream pond. The greenhouse downstream from this pond is partially on top of this impacted watercourse. The

Greenhouse 130' west of *WQ 13* sits on a watercourse. The cut and fill construction for greenhouses at *WQ 7* and *WQ 10* has enabled groundwater to reach the surface, creating wetland-like features.

4. **Spoils management**: Staff observed earthen spoils from site development at locations where they may enter or be transported into receiving waters *(photo 20)*.

5. **Water storage and use**: Staff did not identify any water quality concerns associated with the off-stream ponds located at *WQ 1*. There is rilling downslope from the water tanks at *WQ 2*. Uncontained fuels and fertilizers at *WQ 3* have the potential to discharge to surface waters. As described above, the pond at *WQ 9* sits in the site of a natural spring. The channel at *WQ 11* was modified to facilitate a diversion.

6. **Irrigation runoff**: Excess irrigation runoff is likely to enter watercourses at *WQ9 and 13*.

7. **Fertilizers and soil amendments**: In addition to the fertilizers located at *WQ 3* discussed above, staff observed a bag of high-concentration, water soluble fertilizer lying uncovered on bare ground at *WQ 7*.

8. **Pesticides**: Staff did not observe any pesticides on the property.

9. **Petroleum products and other chemicals:** Fuels are stored uncovered and uncontained at *WQ 3 and 11*, and covered, on bare ground, at *WQ 12* with other chemicals.

10. **Cultivation-related wastes**: Staff observed empty fertilizer bags, pots and other cultivation waste littered about the property.

11. **Refuse and human waste**: Human waste is discharged to ground southeast of *WQ 9* and where it can directly enter a watercourse at *WQ 12*.

<u>Recommendations</u>

1) Have a qualified professional identify and delineate all surface waters disturbed and/or buried through site development. This should include a forensic wetland delineation within and adjacent to all ponds, roads, and cultivation areas.

2) Retain a licensed professional to inventory, assess, and develop a workplan and schedule to implement measures to ensure that all developed features, roads, and crossings throughout the parcels 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. The plan should comply with the State's Wetlands Conservation Policy of no net loss to wetlands. 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. As a reference for the goal of this recommendation, review standard conditions 1, 2, 3, and 4 of the regional cannabis order and applicable portions of the statewide cannabis general order, (CANGO) (see links to these orders below).

3) Comply with requirements/directives from CDFW and the Division of Water Rights with respect to appropriate permitting/licensing for water source(s), diversion(s), storage, and use, and ensure that water storage features are modified/maintained so as to minimize the potential for adverse impacts to water quality and beneficial uses. As a reference for the goal of this recommendation, review standard condition 5 of the Regional Water Board Order and relevant portions of the statewide cannabis order, or CANGO (see links to these orders below).

4) Store and contain potting soils, fertilizers, petroleum products and other chemicals properly to prevent spillage and discharge to receiving waters. As a reference for the goal of this recommendation, review standard conditions 7 and 9 of the regional cannabis order and relevant portions of the CANGO.

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. 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/

6) 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.

The regional cannabis order (Order No. R1-2015-0023) can be found at this link:

https://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/2015/15_0023_Cannabis_Order.pdf

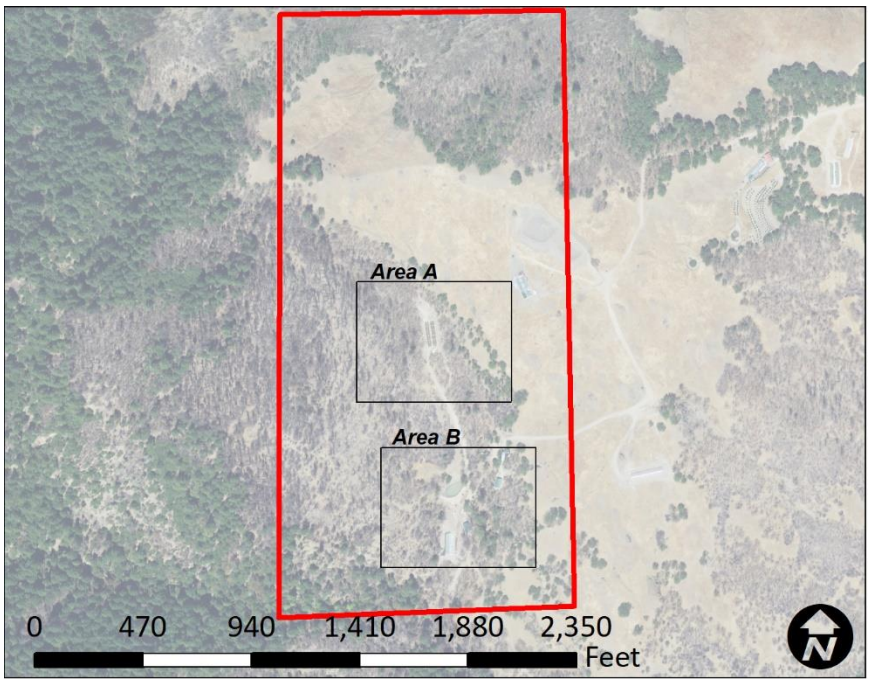
The CANGO (Order WQ 2017-0023-DWQ, General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities) can be found at this link:

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

Enforcement Discretion

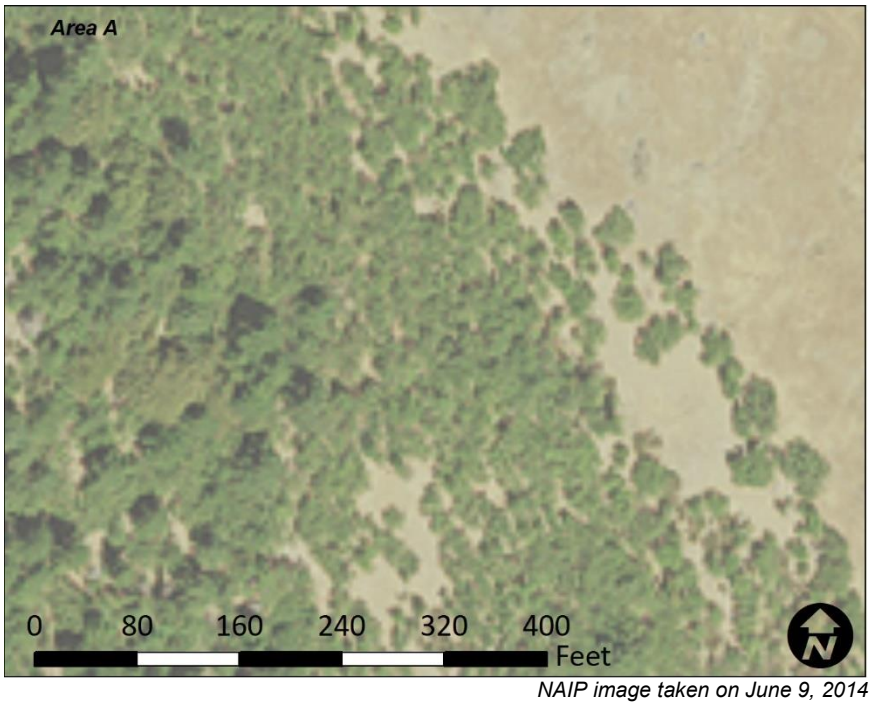
The observations in this report will be assessed for violations of the California Water Code. The Regional Water Board and the State Water Board reserve the rights to take any enforcement action authorized by law.

Aerial images



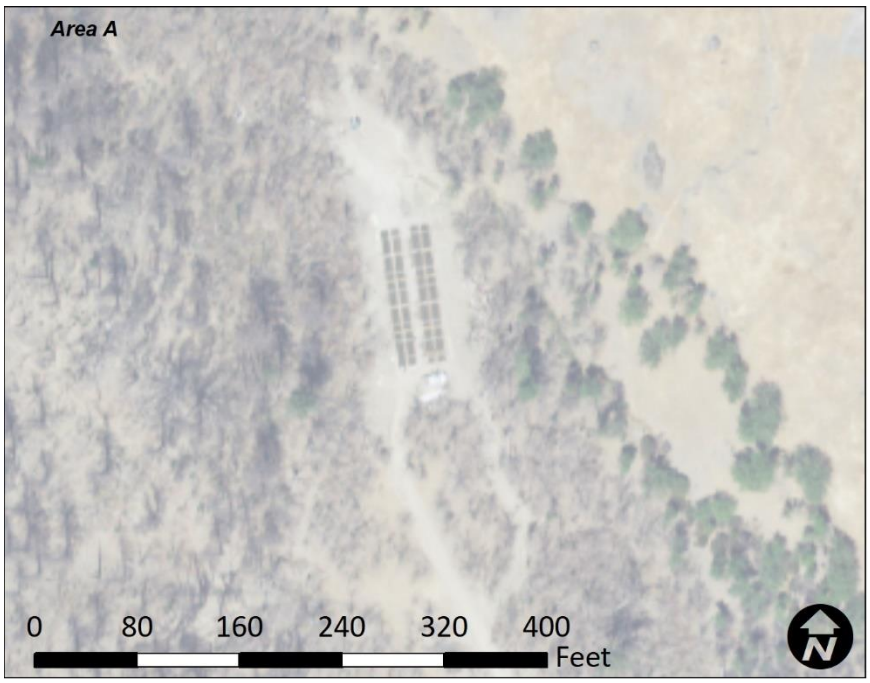

*NAIP image taken on July 12, 2016*

2012 NAIP aerial image. Red lines show approximate parcel boundary and black rectangle shows area pictured in below NAIP images.




*NAIP image taken on June 9, 2014*

NAIP 2014 – Area A




*NAIP image taken on July 12, 2016*

NAIP 2016 – Area A – note cleared, bare areas and greenhouses.


*NAIP image taken on July 3, 2012*

NAIP 2012 – Area B – Note green area at the center, suspected 0.3-acre wetland.


*NAIP image taken on June 9, 2014*

NAIP 2014 – Area B.


*NAIP image taken on July 12, 2016*

NAIP 2016 – Area B – note pond now visible at the center of the image.

Selected Photos

*Photo Taken by: S. Utley 25 September 2018*

photo 1 – Looking southeast at ponds located on top of a ridge a *WQ 1*.

*Photo Taken by: S. Utley 25 September 2018*

photo 2 – Looking northwest at Water tanks on top of a ridge at *WQ 2*.

*Photo Taken by: S. Utley 25 September 2018*

photo 3 – Water tanks on top of the ridge at *WQ 2*. Note rilling on portions of hillslope that have no vegetation.

*Photo Taken by: S. Utley 25 September 2018*

photo 4 – Cluster of water tanks at *WQ 3*. Note change in topography behind tanks signaling the presence of a drainage swale.

*Photo Taken by: S. Utley 25 September 2018*

photo 5 – Cluster of water tanks at *WQ 3* also pictured in photo 4. Note uncovered and uncontained fuel and fertilizers.

*Photo Taken by: S. Utley 25 September 2018*

photo 6 –ATV trail crossing a watercourse head, at *WQ 4,* that is tributary to Hale Creek.

*Photo Taken by: S. Utley 25 September 2018*

photo 7 – *WQ 5,* ATV trail crossing tributary to Hale Creek.

*Photo Taken by: S. Utley 25 September 2018*

photo 8 – WQ 6*,* ATV trail crossing tributary to Hale Creek.

*Photo Taken by: B. Fuller 25 September 2018*

photo 9 – Looking south at the northern edge of the graded flat located at *WQ 7*. Note water is emanating from the ground. Location shown as *Area A* in aerial images.

*Photo Taken by: S. Utley 25 September 2018*

photo 10 – *WQ 7*, northern edge of the graded flat looking north. Note juncus growing where water is emanating from the ground. Depth of excavation into hillslope is apparent in back left of image


*Photo Taken by: B. Fuller 25 September 2018*

photo 11 – *WQ 7*, area in front of greenhouse depicted in photo 9. Note bag of high-concentration, water soluble fertilizer is lying uncovered on bare ground.

*Photo Taken by: S. Utley 25 September 2018*

photo 12 – *WQ 8*, layer of fine, fluffy soil as thick as 1.5 inches on the road.

*Photo Taken by: S. Utley 25 September 2018*

photo 13 – Looking southwest from the road towards the pond located at *WQ 9*.

*Photo Taken by: S. Utley 25 September 2018*

photo 14 – Looking northeast from pond dam located at *WQ 9* with road in the background right of the picture.

*Photo Taken by: S. Utley 25 September 2018*

photo 15 – Looking northwest from pond dam located at *WQ 9*. Note ephemeral watercourse in top right of picture.

*Photo Taken by: B. Fuller 25 September 2018*

photo 16 – Looking west from pond dam located at *WQ 9.* Note inlet to pond overflow pipe.

*Photo Taken by: S. Utley 25 September 2018*

photo 17 – Looking north at pond dam outboard face located at *WQ 9*. Note pond outlet at upper right of image discharging onto dam face. Culvert pictured in *photo 18* is in the lower left of the image.

*Photo Taken by: S. Utley 25 September 2018*

photo 18 – Looking south from the pond at *WQ 9*, greenhouse on placed fill pictured in photo 19 is in center back of picture and greenhouse at *WQ 10* is in back right of picture.

*Photo Taken by: B. Fuller 25 September 2018*

photo 19 – Looking north at the greenhouse on fill pictured in *photo 18*.

*Photo Taken by: S. Utley 25 September 2018*

photo 20 – Looking south from same photo location as *photo 19*, water flowing from the pond enters from the left, flows over the spoils in the foreground of the picture, and enters a watercourse in the back right of the picture.

*Photo Taken by: S. Utley 25 September 2018*

photo 21 – Toilet discharging to ground, located between two watercourses southeast of *WQ 9*.

*Photo Taken by: S. Utley 25 September 2018*

photo 22 – Looking southwest at the greenhouse occupying the flat on top of placed fill at *WQ 10*. Note loose earthen material on the road is susceptible to erosion.

*Photo Taken by: S. Utley 25 September 2018*

photo 23 – Looking west at the greenhouse at *WQ 10*. Note juncus and other grasses grow in the saturated ground at the front of the greenhouse.

*Photo Taken by: S. Utley 25 September 2018*

photo 24 –Tributary to Hale Creek is dammed at 40°22'13.19"N, 123°27'31.09"W, *WQ 11*, to facilitate a water diversion.

*Photo Taken by: S. Utley 25 September 2018*

photo 25 – Runoff from cooking and bathing area at *WQ 12*, flows directly into the watercourse located in the background of the picture.

*Photo Taken by: S. Utley 25 September 2018*

photo 26 – 55-gallon drums of Gaco Western ISO-52 ISO component A, and 183M Polyol Component B, sitting on bare ground at *WQ 12*.

*Photo Taken by: S. Utley 25 September 2018*

photo 27 – Greenhouse in ephemeral watercourse west of *WQ 13*.


*Photo Taken by: S. Utley 25 September 2018*

photo 28 – Picture taken looking east at *WQ 13*, shows a culvert with a substantially smaller diameter than the channel width.

*Photo Taken by: B. Fuller 25 September 2018*

photo 29 –Road crossing watercourse head east of *WQ 13*.

*Photo Taken by: S. Utley 25 September 2018*

photo 30 – Looking northeast where the flat area was cut into the hillslope for the greenhouse at *WQ 14*. Note rilling on the upslope cut-bank.

*Photo Taken by: S. Utley 25 September 2018*

photo 31 – Looking southeast at the fill pad and greenhouse at *WQ 14.*

*Photo Taken by: B. Fuller 25 September 2018*

photo 32 – Looking southwest at the earthen fill pad at *WQ 14*. Note fill upslope from ephemeral watercourse that is tributary to Hale Creek.

TO: Diana Henrioulle

FROM: Brian Fuller

DATE: December 31, 2019

**July 02, 2019, Warrant Inspection**
**Trinity County Assessor's Parcel Number (APN) 018-230-21-00**

File: Cannabis Inspections, Trinity County, 2019, 190702 Lost Coast Outreach LLC 018-230-21-00, CIWQS Place ID No. 854510

**Property Information**

County: Trinity

Physical address: 1045 Hale Creek Ridge Rd,
Mad River, CA, 95552

APN: 018-230-21-00

Owner: Lost Coast Outreach LLC
PO Box 3120
Eureka, CA 95502

Transaction History (per LandVision): Last recorded sale April 29, 2016; seller Joseph C. Rice and Jill R. Rice

Aerial imagery:
Aerial imagery available on google.com/maps shows evidence the property was being developed for cannabis cultivation on May 28, 2016.

Size: 74.4 acres

Watershed: Mad River Hydrologic Unit; Ruth Hydrologic Area; (HU/HA/HSA 109.40; Table 2-1, Water Quality Control Plan for the North Coast Region).

**Regulatory status with the North Coast Regional Water Quality Control Board (Regional Water Board)**

Site Development: N/A

- No record of permitting for site development.

Applicable programs:

- Regional Water Board's Clean Water Act section 401 Water Quality Certification permit for dredge/fill activities in a surface water

Onsite activities/operations: N/A.

- No record of enrollment in any State or Regional Water Board regulatory program

Applicable programs:

- Regional or statewide cannabis order
- Waste discharge requirements for discharge of waste to waters of the state.

[Note: This Property did not have a County permit for cannabis cultivation at the time of the inspection.]

Inspection information:

Date/time: July 2, 2019/ morning

Type: California Department of Fish and Wildlife (CDFW) Warrant Inspection

Attendance:

David Manthorne, Senior Environmental Scientist (ES) Specialist, CDFW
David Rosas, ES, DIV
Steven Hall, ES, DIV
Brian Fuller, Engineering Geologist (EG), Regional Water Board
Adona White, PE, Water Resource Control Engineer, Regional Water Board
Ermias Berhe, EG, Regional Water Board
Amanda Piscitelli, ES, Regional Water Board

Background/Objective:
North Coast Regional Water Board (Regional Water Board) staff participated with personnel from CDFW and the State Water Board's Division of Water Rights (DIV) in the inspection. Objectives for Regional Water Board staff (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**

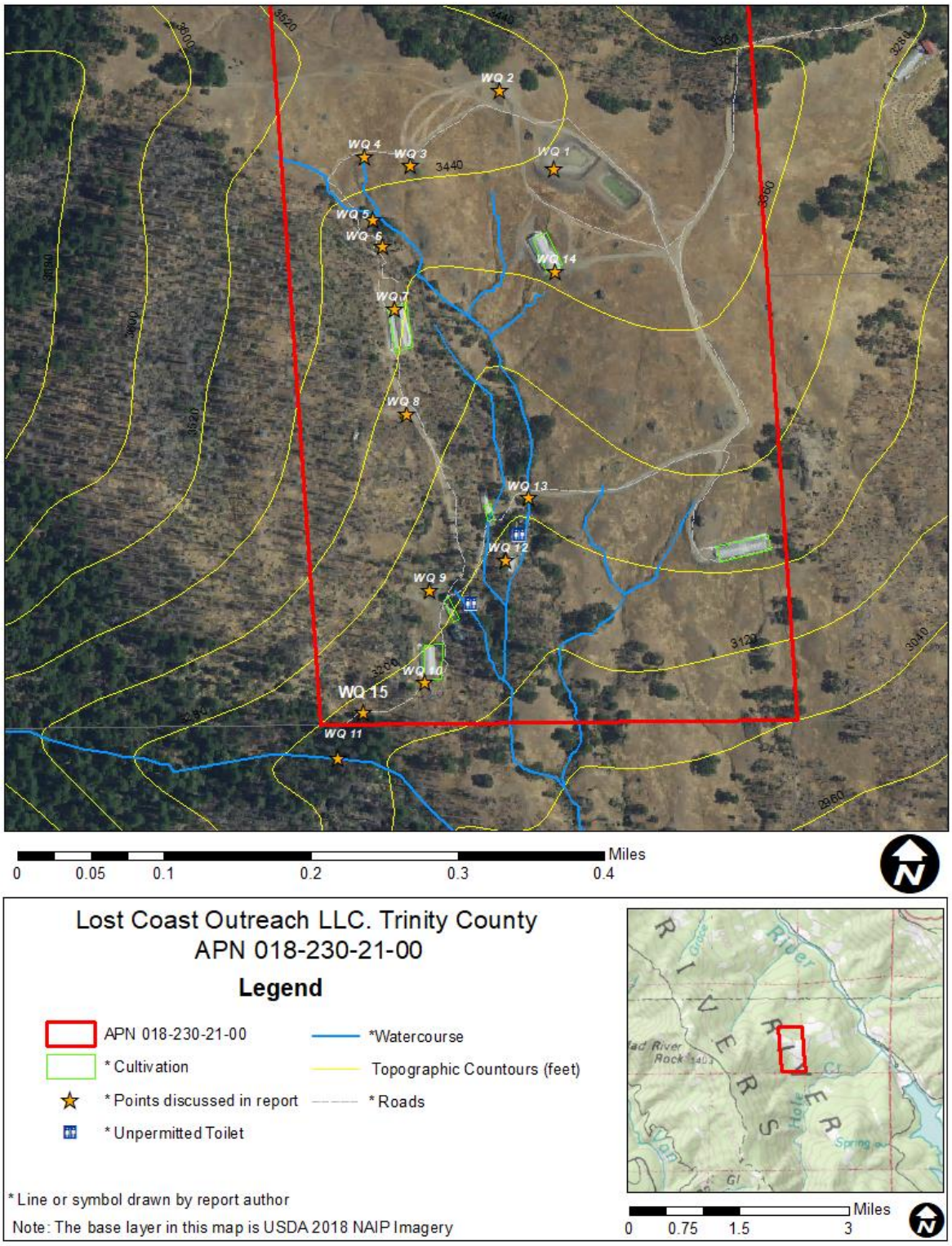



Figure 1: Map of Property, including inspection points of interest

**Inspection Observations**

The above site map shows inspection points with features representing water quality concerns that are discussed below. We accessed the property along a dirt road from the east and walked west, passing two empty ponds near the ridge-top (photo 1). On a previous inspection, in September 2018, I had observed a group of 4 water tanks, northwest of the pond at WQ 2; these were no longer present. We headed west to WQ 3, where I had observed another cluster of tanks in September 2018. These tanks remained (photo 2), WQ 3, and as I had observed in September 2018, the area still had uncovered and uncontained fuel and fertilizer containers, at a location where these pollutants have the potential to be transported 200 feet south to a tributary to Hale Creek.

We continued south from WQ 3 to WQ 7, along the route of a former ATV trail that had been present in September 2018, now overgrown with vegetation. At WQ 7, we observed a 0.3-acre cleared earthen pad, approximately 50 feet west of a tributary to Hale Creek (photo 3). Conditions at WQ 7 were the same as I had observed during the September 2018 inspection; I observed water emanating from the ground near the northern edge of one greenhouse (photo 3) and I observed the plant species juncus growing in the saturated ground. In front of another greenhouse, I observed a bag of Grow More Brand fertilizer lying uncovered on bare ground (photo 4).

**Impounded spring WQ 9**

We continued south from WQ 7 along a dirt road that was in similar condition as I observed during the September 2018 inspection (photo 5). At inspection point WQ 8 along this dirt road, the road is shaped such that stormwater will run down the road surface and deliver to a pond to the south. We continued following this road south, arriving at the pond (photo 6 - photo 9), WQ 9. Conditions at the pond were similar to those I had observed in September 2018, but with more vegetation on the pond buttress and the addition of a tank on the southwest edge of the pond, for mixing fertilizers (photo 10).

Immediately south of the pond at WQ 9, I observed a toilet discharging to the ground less than 50’ from a watercourse (photo 11), in similar condition to what I had observed in September 2018.

From WQ 9, we walked south to another earthen fill pad, at WQ 10, cut into the hillslope. Similar to the conditions at WQ 7, I observed saturated ground and juncus growing in front of the greenhouse at WQ 10 (photo 12). Inspection participant Ermias Berhe reported observing a point of diversion, including a small instream dam comprised of river cobbles, in the vicinity of WQ 15, southwest of WQ 10 (photo 13).

Northeast of WQ 9, at WQ 12, is a small group of structures bound by watercourses to the east and west; these were in a similar condition as I had observed during the September 2018 inspection, and I observed the same four 55-gallon drums of

chemicals I had observed in September 2018 (photo 14). On the road north of WQ 12, I observed that the undersized culvert at WQ 13 (photo 15) was in the same condition as it had been during the September 2018 inspection. We returned to the northern portion of the property and I observed that the greenhouses present at WQ 14 during the September 2018 inspection were no longer present, however the ground disturbance remained (photo 16).

| *Map point* | *Feature* | *Brief Description* | *Water Quality Concern* | *Associated Photo(s)* |
|---|---|---|---|---|
| WQ 3 | Nutrient mixing location | Fertilizer containers on the ground. | Threatened discharge of waste to receiving waters. | *photo 2* |
| WQ 7 | Cannabis cultivation area | Estimated 12,000 square foot greenhouse used for cannabis cultivation. | Cannabis cultivation/discharge of waste without a report of waste discharge and/or coverage under State Water Board regulatory order. | *photo 3* |
| WQ 7 | Cleared earthen pad | Pad cut into hillslope, groundwater emanating from the ground, and uncovered/ uncontained fertilizers | Threatened discharge of waste to receiving waters. | *photo 3 and photo 4* |
| WQ 8 | Steep unarmored road | Fine sediment visible on road surface. | Threatened discharge of waste to receiving waters. | *photo 5* |
| WQ 9 | Onstream reservoir | Pond and dam constructed in apparent surface water feature | Unauthorized dredge/fill in surface water. | *photo 6 through photo 10* |

| *Map point* | *Feature* | *Brief Description* | *Water Quality Concern* | *Associated Photo(s)* |
|---|---|---|---|---|
| East of WQ 9 | Outhouse | Outhouse waste discharges to ground within 50 feet of a Tributary to Hale Creek | Threatened discharge of waste to receiving waters. | *photo 11* |
| WQ 10 | Cannabis cultivation area | Estimated 7,000 square foot greenhouse used for cannabis cultivation. | Cannabis cultivation/discharge of waste without a report of waste discharge and/or coverage under State Water Board regulatory order. | *photo 12* |
| WQ 10 | Cleared earthen pad | Pad cut into hillslope, groundwater emanating from the ground, uncovered/ uncontained fertilizers | Threatened discharge of waste to receiving waters. | *photo 12* |
| WQ 12 | 55-gallon drums of chemicals | These drums have been stored outside and on bare ground for at least 280 days | Threatened discharge of waste to receiving waters. | *photo 14* |
| WQ 13 | Culverted stream | Culvert is undersized and perched | Unauthorized dredge/fill in surface water. | *photo 15* |
| WQ 14 | Cleared earthen pad | Bare ground, site of former greenhouse, susceptible to erosion by stormwater | Threatened discharge of waste to receiving waters. | *photo 16* |

| *Map point* | *Feature* | *Brief Description* | *Water Quality Concern* | *Associated Photo(s)* |
|---|---|---|---|---|
| WQ 14 | Stream diversion | Dam made with local river cobbles, pools water for diversion | Unauthorized water diversion. | *photo 13* |

**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: The roads throughout the property are not rocked (photo *5*), they show evidence of erosion and/or erodibility, and they drain to tributaries to Hale Creek.

2. Stream crossing maintenance and improvement: Existing culverts at WQ 9 and west of WQ 13 are blocked, and the culvert at WQ 13 appeared to be undersized and perched.

3. Riparian and wetland protection and management: A jurisdictional spring and associated wetland at WQ 9 appears to have been excavated and replaced with a pond. The cut and fill construction for greenhouses at WQ 7 and WQ 10 has enabled groundwater to reach the surface, creating wetland-like features.

4. Spoils management: During the September 2018 inspection, I observed earthen spoils interrupting a watercourse downstream of WQ 9. I did not inspect this feature during the July 2019 inspection, nor did I note new spoil piles.

5. Water storage and use: I did not identify any water quality concerns associated with the off-stream ponds located at WQ 1. Uncontained fuels and fertilizers at tanks stored at WQ 3 and WQ 9 have the potential to discharge to surface waters. As described above, the pond at WQ 9 sits in the site of a natural spring. The channel at WQ 15 was modified to facilitate a diversion.

6. Irrigation runoff: Excess irrigation runoff threatens to enter watercourses at WQ7 and WQ 9.

7. Fertilizers and soil amendments: In addition to the fertilizers located at WQ 3 and WQ 9 discussed above, I observed a bag of high-concentration, water-soluble fertilizer lying uncovered on bare ground at WQ 7.

8. Pesticides: I did not observe any pesticides on the property.

9. Petroleum products and other chemicals: Fuels are stored uncovered and uncontained at WQ 3, WQ 9 and WQ 11, and covered, on bare ground, at WQ 12 with other chemicals.

10. Cultivation-related wastes: I observed empty fertilizer bags, pots and other cultivation waste littered about the property.

11. Refuse and human waste: Human waste is discharged to ground southeast of WQ 9 and where it can directly enter a watercourse at WQ 12.

**Recommendations**

1) Have a qualified professional identify and delineate all surface waters disturbed and/or buried through site development. This should include a forensic wetland delineation within and adjacent to all ponds, roads, and cultivation areas.

2) Retain a licensed professional to inventory, assess, and develop a workplan and schedule to implement measures to ensure that all developed features, roads, and crossings throughout the parcels 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. The plan should comply with the State's Wetlands Conservation Policy of no net loss to wetlands. 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. As a reference for the goal of this recommendation, review standard conditions 1, 2, 3, and 4 of the regional cannabis order and applicable portions of the statewide cannabis general order, (CANGO) (see links to these orders below).

3) Comply with requirements/directives from CDFW and the Division of Water Rights with respect to appropriate permitting/licensing for water source(s), diversion(s), storage, and use, and ensure that water storage features are modified/maintained so as to minimize the potential for adverse impacts to water quality and beneficial uses. As a reference for the goal of this recommendation, review standard condition 5 of the Regional Water Board Order and relevant portions of the statewide cannabis order, or CANGO (see links to these orders below).

4) Store and contain potting soils, fertilizers, petroleum products and other chemicals properly to prevent spillage and discharge to receiving waters. As a reference for the goal of this recommendation, review standard conditions 7 and

9 of the regional cannabis order and relevant portions of the CANGO.

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. 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/

6) 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.

The regional cannabis order (Order No. R1-2015-0023) can be found at this link:

https://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/2015/15_0023_Cannabis_Order.pdf

The CANGO (Order WQ 2019-0001-DWQ, General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities) can be found at this link:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf

**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 —Looking northwest at ponds located on top of a ridge a WQ 1.

photo 2 —Looking east at nutrient mixing tanks at WQ 3.

photo 3 —Looking south at graded flat cut into hillslope at WQ 7. Note concentrated vegetation between greenhouse and photographer where water is emanating from the subsurface.


photo 4 —Bag of high-concentration, water-soluble, fertilizer discharging to ground between the two hoop-houses pictured in photo 3 at WQ 7.

photo 5 —Looking north up steep, unarmored road with ruts and loose, fine sediment.

photo 6 —Looking southwest at reservoir impounding watercourses at WQ 9.

photo 7 —Looking north at reservoir impounding watercourses at WQ 9.

photo 8 —Looking west at reservoir impounding watercourses at WQ 9.

photo 9 —Looking south from top of the reservoirs impounding buttress in the vicinity of WQ 9.

photo 10 —Looking south from top of the reservoir's impounding buttress in the vicinity of WQ 9.

photo 11 —Looking at the outhouse southeast of WQ 9.

photo 12—Looking south at graded flat cut into hillslope at WQ 10. Note concentrated vegetation between greenhouse and photographer where water is emanating from the subsurface.

photo 13 —Watercourse dammed in the vicinity of WQ 15, to facilitate a water diversion.

photo 14 —55-gallon drums of Gaco Western ISO-52 ISO component A, and 183M Polyol Component B, sitting on bare ground at WQ 12.

photo 15 —Picture taken looking south at undersized culvert outlet located at WQ 13.

photo 16 —Looking southwest at the earthen fill pad at WQ 14. Note that bare earth is susceptible to erosion and trasnport to receiving water from srormwater.