



North Coast Regional Water Quality Control Board

October 19, 2020

Certified Mail No. 7016 2710 0000 2653 2817

Szagora LLC
Attn: Ted Nash
2480 Crystal Ship Court
Henderson, NV, 89052

Certified Mail No. 7016 2710 0000 2653 2824

Szagora LLC
Attn: Rudy Chacon
PO Box 2541
San Pedro, CA, 90731

Dear Mr. Nash and Mr. Chacon:

Subject: **Notice of Violation, Directive to Obtain Regulatory Coverage for Cannabis Cultivation, and Transmittal of Inspection Report for July 20, 2020 Inspection of Humboldt County Assessor's Parcel No. 208-054-003-000**

File: Cannabis Inspections, Humboldt County, 2020, APN 208-054-003-000, Szagora LLC, CIWQS Place ID No. 830016

This letter is to notify you of observed violations of the requirements listed below for threatened 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 Prohibition 2

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

VALERIE L. QUINTO, CHAIR | MATTHIAS ST. JOHN, EXECUTIVE OFFICER

5550 Skylane Blvd., Suite A, Santa Rosa, CA 95403 | www.waterboards.ca.gov/northcoast

Background

On July 20, 2020, staff from the North Coast Regional Water Quality Control Board (Regional Water Board), accompanied by personnel from Humboldt County, the California Department of Fish and Wildlife (CDFW), and various law enforcement agencies, inspected the subject Property. The purpose of the inspection was to evaluate onsite development and conditions, and to identify and assess any impacts or threatened impacts to the quality and beneficial uses of waters of the state.

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

Relevant Requirements

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

Observed Violations

As documented in the inspection report, Regional Water Board staff observed cannabis cultivation and associated site disturbance of sufficient size and scope to require regulatory coverage under State Water Resources Control Board (State Water Board) Order No. WQ-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 the threat of earthen material from the road and inadequate stream crossings at WQ 7, WQ 8, WQ 9, WQ 10 and WQ 13 in 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 violation of the Water Code and the Basin Plan warrants further enforcement. We encourage you to take steps to correct the violations as soon as possible, securing any applicable permits from this and other agencies prior to conducting work. Please note that the existing conditions, as observed and documented in the Inspection Report, may represent continuing violations of the Water Code and the 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.

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 Attn: Water Quality Fees – Cannabis General Order P.O. Box 1888 Sacramento, CA 95812-1888	Accounting Office Attn: Water Quality Fees – Cannabis General Order 1001 I Street 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 evidence of payment to:

North Coast Water Board
Attn: Diana Henriouille
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 Inspection Report provides recommendations to correct violations, as well as to address features and conditions that threaten to impact water quality. **Within 30 days of this letter**, please advise 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.Henriouille@waterboards.ca.gov. Additionally, we are available to meet with you if you wish to discuss this letter, the inspection report, or our waste discharge regulatory programs in further detail.

Sincerely,

Diana Henriouille, P.E.
Enforcement Unit

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Attachments: Attachment A – Regulatory Citations
Water Quality Report of July 20, 2020 Inspection

cc: Department of Fish and Wildlife
Ryan Bourque, Ryan.Bourque@wildlife.ca.gov

Humboldt County Planning and Building Department
Brady Wiley, BWiley@co.humboldt.ca.us
Robert Russell, RRussell@co.humboldt.ca.us

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
Stormer Feiler, Stormer.Feiler@waterboards.ca.gov

Attachment A – Regulatory Citations

Regulatory Section	Citation
Basin Plan Section 4.2.1, Prohibition 2	Prohibits “[t]he placing or disposal of soil, silt, bark, slash, sawdust, or other organic and earthen material from any logging, construction, or associated activity of whatever nature at locations where such material could pass into any stream or watercourse in the basin in quantities which could be deleterious to fish, wildlife, or other beneficial uses.”
California Water Code Section 13260	<p>“(a) Each of the following persons shall file with the appropriate regional board a report of the discharge, containing the information that may be required by the regional board:</p> <p style="padding-left: 40px;">(1) A person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than into a community sewer system.</p> <p style="padding-left: 40px;">(2) A person who is a citizen, domiciliary, or political agency or entity of this state discharging waste, or proposing to discharge waste, outside the boundaries of the state in a manner that could affect the quality of the waters of the state within any region.”</p>
California Water Code Section 13261(a)	“A person who fails to furnish a report or pay a fee under Section 13260 when so requested by a regional board is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).”

Regulatory Section	Citation
California Water Code Section 13264 (a)	<p>“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:</p> <p>(1) The issuance of waste discharge requirements pursuant to Section 13263.</p> <p>(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:...</p> <p>(3) The issuance of a waiver pursuant to Section 13269.”</p>
California Water Code Section 13265(a)	<p>“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.”</p>
California Water Code Section 13350	<p>“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).”</p>

North Coast Regional Water Quality Control Board

TO: Diana Henriouille

FROM: Brian Fuller

DATE: October 16, 2020

July 20, 2020 Warrant Inspection
Humboldt County Assessor's Parcel Number (APN) 208-054-003-000

File: Cannabis Inspections, Humboldt County, 2020, APN 208-054-003-000,
Szagora LLC, CIWQS Place ID No. 830016

Property Information

County: Humboldt

Physical address: No physical address

APN: 208-054-003-000 (the Property)

Owner: Szagora LLC
2480 Crystal Ship Ct.
Henderson, NV, 89052

Transaction History (per LandVision): Radka Ivanova sold the property to Rumen I Shitsov and Ivan D Katzarov on September 24, 2019. Rumen I Shitsov and Ivan D Katzarov sold the property to the current owner, Szagora LLC on December 9, 2019.

Size: 88 acres

Watershed: Mad River Hydrologic Unit; Butler Valley Hydrologic Area; (HU/HA 109.30; Table 2-1, Water Quality Control Plan for the North Coast Region).

Aerial imagery:

- Between December 31, 2004 and May 24, 2009- Deck with outdoor cannabis cultivation area constructed.

- Between May 24, 2009 and April 24, 2010 - Greenhouses were constructed in the northern part of the property.
- Between August 23, 2012 and May 28, 2014 - Greenhouses were constructed in the western part of the property.
- On April 30, 2019 all greenhouses had been disassembled.

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

- On August 25, 2016, Regional Water Board staff sent a letter to Radka Ivanova and Eddy Lazarov, directing them to obtain regulatory coverage required by water code 13260.
- No record of enrollment in any State or Regional Water Board regulatory program prior to the inspection.

Applicable programs:

- 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 20, 2020/ midday

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

Attendance:

Brian Fuller, Engineering Geologist (EG), Regional Water Board
Ryan Bourque, Senior Environmental Scientist (ES) Specialist, CDFW
Brady Wiley, Humboldt County Code Enforcement

Background/Objective:

Objectives for Regional Water Board staff included observing site development and activities and identifying and assessing onsite features or conditions that are causing or may cause adverse impacts to the quality and beneficial uses of receiving waters, including surface and ground water.

Inspection Map

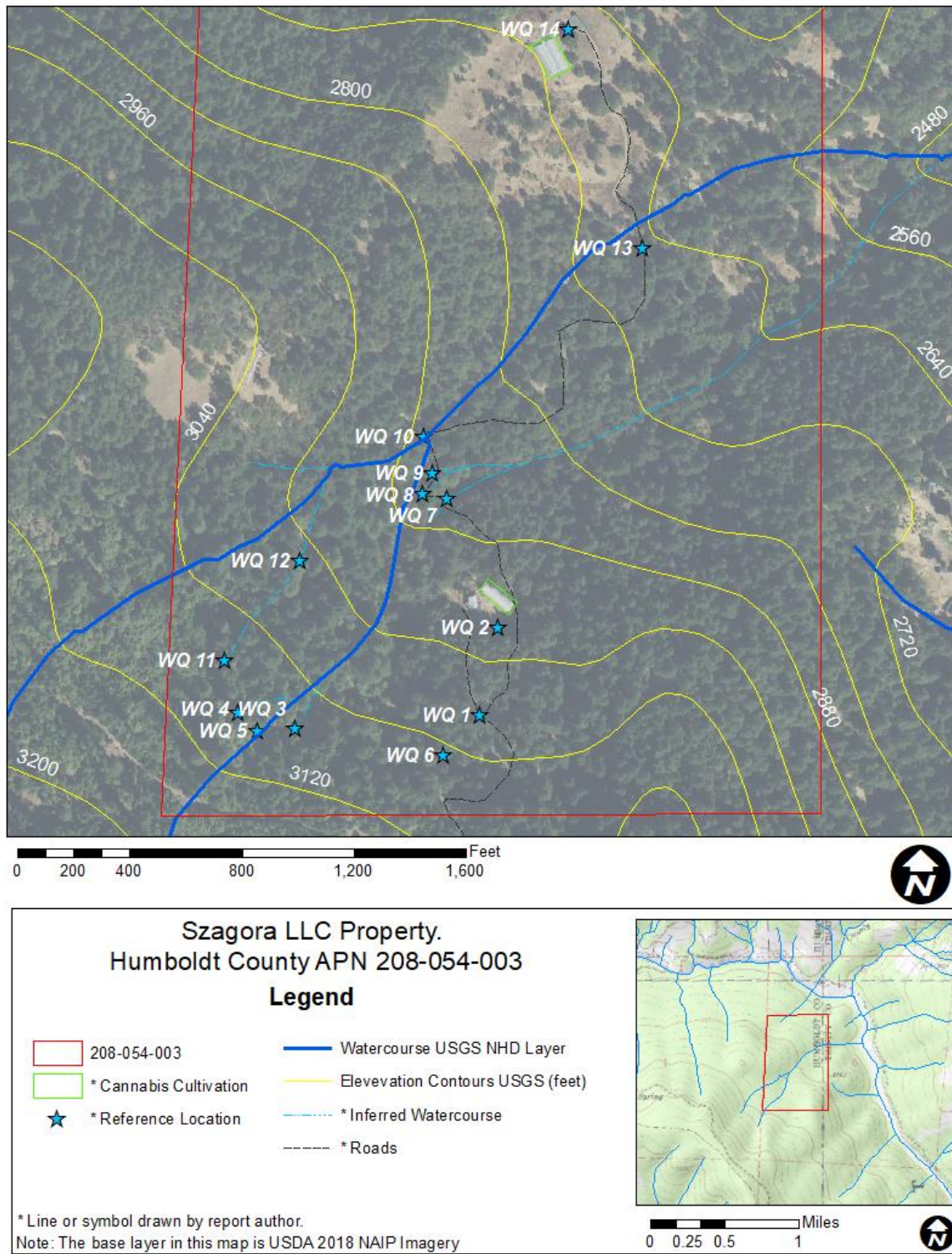


Figure 1: Map of Property, including inspection points of interest

Inspection Observations

Figure 1, above, shows inspection points identified and discussed in this report. I accessed the property along a dirt road from the south and parked in the vicinity of WQ 1, where I observed a pile of uncontained plastic waste (Photo 1). I walked north and observed a cannabis cultivation area on an approximately 3,500 square foot deck (Photo 2) at WQ 2. Near this cultivation area, I observed fuels and liquid fertilizers, uncontained, outdoors, on bare ground (Photo 3 and Photo 4). I walked west from WQ 2, observed a black plastic pipe, and followed it to a series of stream diversions that I observed at WQ 3, WQ 4, and WQ 5 (Photo 5 through Photo 9). I followed more plastic pipe from the diversion at WQ 5 to a 1,100-gallon water tank located at WQ 6 (Photo 10).

From WQ 6, I walked northeast and past a shed with a barking dog and a 55-gallon drum of unknown contents (Photo 11). Near to the shed, I observed liquid fertilizers, uncontained, outdoors, on a sheet of plywood (Photo 12). At a fork in the road I walked northeast from WQ 1 and I observed that the steep road lacked features, such as water bars or rolling dips, to direct stormwater off the road (Photo 13).

I followed the road north to a 24-inch diameter culvert (Photo 14) at the bottom of a steep, hydrologically-connected segment of road at WQ 7. I observed that the watercourse upstream was approximately 4 feet wide, and I ascertained that the culvert was likely too small to accommodate a 100-year stormflow. I continued down the road and observed another steep section of road hydrologically-connected to a watercourse at WQ 8 (Photo 15). I observed that the watercourse was culverted with a 24-inch diameter plastic pipe, partially buried in the road fill at WQ 8 (Photo 16 and Photo 17). I continued following the road to WQ 9 where I observed another watercourse culverted below the road (Photo 18 and Photo 19). I observed that the watercourse upstream was approximately four feet wide, the culvert was approximately 24 inches in diameter, and the culvert was buried shallowly in the road fill, and not aligned with the watercourse bed.

From WQ 9, I continued north along the road and observed another watercourse crossing at WQ 10. I observed that the road approaching the watercourse had an earthen surface that was susceptible to erosion and the road elevation was lowest above the culvert, so if the culvert failed to convey the full discharge of the watercourse, the stream overflow would pass over and scour the road fill prism (Photo 20). I observed that the culvert at WQ 10 was only partially buried in the road fill prism (Photo 21) and I observed the watercourse upstream from the road had aggraded with sediment which had been recently excavated (Photo 22).

I walked southwest of the road from WQ 10 and observed three more watercourse diversions at WQ 11 and WQ 12 (Photo 23 through Photo 25). I returned to the road in the vicinity of WQ 10 and then followed the road north to WQ 13 where I observed

another watercourse, approximately 3 feet wide, culverted across the road through a 24 inch diameter, shallowly buried, plastic pipe (Photo 26).

I continued following the road north to a cultivation area at WQ 14. Here I observed approximately 6,000 square feet of cannabis growing in hoop-type greenhouses (Photo 27), fuels stored uncovered outdoors (Photo 28), and used motor oil or another liquid in an open tray on bare ground (Photo 29).

<i>Map point(s)</i>	<i>Feature</i>	<i>Brief Description</i>	<i>Water Quality Concern</i>	<i>Associated Photo(s)</i>
WQ 1	Uncontained refuse	Piles of trash uncontained outdoors	threatened discharge of waste to receiving waters	Photo 1,
WQ 1, WQ 2 and WQ 14	Improperly stored fuels and chemicals	chemical containers uncontained outdoors	threatened discharge of waste to receiving waters	Photo 11, Photo 12, Photo 3, Photo 4, Photo 28, and Photo 29
WQ 2 and WQ 14	outdoor cannabis cultivation areas.	~9,500 square feet of outdoor cannabis cultivation	cannabis cultivation/discharge of waste without a report of waste discharge and/or coverage under State Water Board regulatory order	Photo 2 and Photo 27
WQ 3, WQ 4, WQ 5, WQ 11, and WQ 12	Unauthorized water diversions	Plastic waste placed in watercourses to facilitate stream diversions	unauthorized discharge of waste to waters of the state	Photo 5 through Photo 9 and Photo 23 through Photo 25

<i>Map point(s)</i>	<i>Feature</i>	<i>Brief Description</i>	<i>Water Quality Concern</i>	<i>Associated Photo(s)</i>
WQ 1, WQ 7 to WQ 10 and WQ 13	road	Road lacks drainage features on steep segments hydrologically connected to receiving waters	threatened discharge of waste to receiving waters	Photo 13, Photo 15 and Photo 20
WQ 7, WQ 8, WQ 9, WQ 10 and WQ 13	Culverted watercourse	Culverts are undersized, poorly aligned and the inlets and outlets lack armor	threatened discharge of waste to receiving waters	Photo 14 through Photo 22 and Photo 26

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 road at WQ 1 is susceptible to erosion by stormwater. Between WQ 7 and WQ 10, as well as at WQ 13, the road is susceptible to erosion by stormwater and hydrologically-connected to receiving waters.

2. Stream crossing maintenance and improvement:

Culverts at WQ 7, WQ 8, WQ 9, WQ 10 and WQ 13 are not sized adequately to accommodate an anticipated 100-year storm event, are not aligned with the channel bed, and it is likely that if storm flows exceed culvert capacity, runoff will erode and transport earthen material making up the road prisms.

3. Riparian and wetland protection and management:

I did not observe any threats to water quality associated with the distance and condition of the intervening buffer between cultivation areas and surface waters.

4. Spoils management:

I did not observe significant threats to water quality associated with spoils management.

5. Water storage and use:

I observed a tank at WQ-6 storing water that had been diverted from surface water without authorization.

6. Irrigation runoff:

I did not observe significant threats to water quality associated with irrigation runoff.

7. Fertilizers and soil amendments:

I observed liquid fertilizer containers outside at WQ 2 and staged for mixing near a pump on a piece of plywood at WQ 1. Fertilizer spills in this area would discharge to the ground, but are far from watercourses.

8. Pesticides:

I did not observe anything that I identified as pesticides on the property.

9. Petroleum products and other chemicals:

I observed fuel containers, uncontained, on bare ground at WQ 2, and partially resting on a sheet of plywood next to a 55-gallon drum at WQ 14. Petroleum spills in this area would discharge to ground, but are far from watercourses.

10. Cultivation-related wastes:

I observed waste potting soils bags, uncontained, in a pile at WQ 1 where they had the potential to be scattered by wind and blown to watercourses.

11. Refuse and human waste:

I did not observe the method(s) used for disposing of refuse and human waste on the property.

Recommendations

1. Retain a licensed professional to inventory, assess, and develop a workplan and schedule to implement measures to ensure that all developed features, roads, watercourse crossings, and cultivation areas throughout the Property are corrected, restored, and/or maintained in conditions that prevent or minimize erosion, sediment transport/delivery, and adverse impacts to water quality and beneficial uses. Include measures to ensure that unstable features caused or affected by onsite development and operations are removed or otherwise protected so as to minimize the potential for these features to cause adverse impacts to water quality and beneficial uses. Dispose of all development and restoration-related earthen spoils in a manner to prevent/minimize transport and delivery to receiving waters.
2. Prior to conducting any instream work associated with recommendation 1, above, submit to the Regional Water Board an application for Clean Water Act section 401 water quality certification, and secure approval from the Regional Water Board.

The 401 Application may be found at the following hyperlink:

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

3. Collect and dispose of or contain all refuse and cultivation-related wastes in a location and manner so as to minimize potential for these wastes to enter or be transported into receiving waters.
4. Store and contain all chemicals, including petroleum, fertilizer and/or pesticides properly to prevent spillage and discharge to receiving waters. Provide secondary containment for all petroleum products.
5. 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.
6. 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/

The statewide cannabis order (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.

Selected Photos



Photo 1—Pile of plastic waste, including empty soil bags, uncontained on side of road in the vicinity of WQ 1.



Photo 2— Approximately 3,500 square foot cannabis cultivation area at WQ 2.



Photo 3—Fertilizer containers outdoors on bare ground next to a shed in the vicinity of WQ 2.



Photo 4—Fuel and fertilizer containers outdoors on bare ground next to a shed in the vicinity of WQ 2.



Photo 5— Plastic box in a three-foot-wide watercourse at WQ 3.



Photo 6—View of the watercourse upstream from the diversion, at WQ 3, pictured in the previous image.



Photo 7—Watercourse diversion at WQ 4 with pipe leading to the diversion at WQ 3.



Photo 8— View of the watercourse downstream from the diversion, at WQ 4, pictured in the previous image.



Photo 9— Watercourse diversion at WQ 5, on the same watercourse as the diversion at WQ 3 but farther upstream.



Photo 10—Water tank located at WQ 6. A plastic pipe originating from the diversion at WQ 5 leads to the top of the tank.



Photo 11—55-gallon drum with unknown contents next to a shed in the vicinity of WQ 1. A dog chained next to the drum prevented staff from inspecting.



Photo 12— Liquid fertilizers and pump on a sheet of plywood in the vicinity of WQ 1.



Photo 13—Looking south along a dirt road towards the shed pictured in Photo 11. The road is steep and lacks features, such as water bars or rolling dips, to direct stormwater off the road. The road's earthen surface is susceptible to erosion by stormwater.



Photo 14— Looking upstream at a 24-inch diameter culvert at WQ 7. The watercourse upstream is approximately four feet wide.



Photo 15— Looking east along a dirt road approaching the stream crossing at WQ 8 which is behind the photographer. The road is steep and lacks features, such as water bars or rolling dips, to direct stormwater off the road. The road's earthen surface is susceptible to erosion by stormwater.



Photo 16— Looking upstream at a 24-inch diameter culvert at WQ 8. The watercourse upstream is approximately four feet wide. The culvert is only partially buried in the road fill prism.



Photo 17— Looking at the outlet of the 24-inch diameter culvert at WQ 8.



Photo 18—Looking upstream in the vicinity of the stream crossing at WQ 9.



Photo 19—Looking at the outlet of the 24-inch culvert located at WQ 9.



Photo 20—Looking at the road crossing a watercourse at WQ 10. The road does not have any road aggregate to prevent erosion and the road shape does not provide a path for stream overflow outside from the road fill.



Photo 21—Looking downstream at WQ 10. The culvert is only partially buried in the road fill prism.



Photo 22—Looking upstream in the expected location of the culvert inlet at WQ 10. The area appeared to have been recently excavated. The culvert inlet is not visible.



Photo 23—Stream diversion fabricated using a juice bottle at WQ 11.



Photo 24—Additional stream diversion at WQ 11 located a short distance upstream from the diversion pictured in the previous photo.



Photo 25— Stream diversion fabricated using a juice bottle at WQ 12.



Photo 26— Looking upstream at a 24-inch diameter culvert at WQ 13. The watercourse upstream is approximately three feet wide.



Photo 27— Approximately 6,000 square foot cannabis cultivation area at WQ 14.



Photo 28—55-gallon drum with unknown contents and uncontained fuel canisters at WQ 14.



Photo 29—Dark, viscous liquid in a paint tray on bare ground at WQ 14