



North Coast Regional Water Quality Control Board

October 25, 2022

Michael Harding
PO Box 218
Whitethorn, CA 95589

Certified Mail No 7021 0950 0001 6499 9057

Dear Michael Harding:

Subject: Notice of Violation, Transmittal of Inspection Report for September 26, 2022, Inspection of Humboldt County Assessor's Parcel Nos. 031-020-45-01, 031-020-46-01, and 031-020-54-01, and Requirement to Respond within 30 days

File: Cannabis Program Inspections, Humboldt County, September 26, 2022, CIWQS Place ID 883738

THIS LETTER REQUIRES THAT YOU ACT WITHIN 30 DAYS

This letter is to notify you of observed violations of the requirements listed below, and cited in Attachment A, at the property identified as Humboldt County Assessor's Parcel Numbers: 031-020-45-01, 031-020-46-01, and 031-020-54-01 (the Property):

1. State Water Resources Control Board (State Water Board) *Cannabis Cultivation Policy Principals and Guidelines for Cannabis Cultivation* (Cannabis Policy)
2. Water Quality Control Plan for the North Coast Region (Basin Plan) Section 4.2.1
3. California Water Code (Water Code) Section 13260 and 13264

According to our records, the cannabis cultivation operation located on this Property is not enrolled for coverage under the Cannabis General Order.

On September 26, 2022, North Coast Regional Water Quality Control Board (Regional Water Board) staff inspected the Property and observed an active outdoor cannabis cultivation and other inactive cannabis cultivation areas with growing soil bags.

Background

LandVision records show that the Property was sold to Michael Harding by Island Mountain LP, on June 21, 2016.

GREGORY A. GIUSTI , CHAIR | MATTHIAS ST. JOHN, EXECUTIVE OFFICER

On September 26, 2022, staff from the Regional Water Board, accompanied by staff of the California Department of Fish and Wildlife (CDFW), the State Water Board Division of Water Rights, and personnel of various law enforcement agencies, inspected the 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. During the inspection, staff observed cannabis cultivation operations of sufficient size and scope to require regulatory coverage under the Cannabis General Order.

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

Relevant Requirements

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

Observed Violations

As documented in the September 26, 2022, inspection report, Regional Water Board staff observed violations of the California Water Code sections 13260, 13264 (a) and Basin Plan Prohibition Section 4.2.1. In addition, staff observed violations of the Cannabis General Order Attachment A, Section 1 - General Requirements and Prohibitions Nos. 1, 25-27, 32, and 37 and Section 2 - Requirements Related to Water Diversions and Waste Discharge for Cannabis Cultivation Nos. 3-4, 7-8, 12, 15-17, 22, 26, 28, 31, 48-56, 59, 70, 73, 76, 79, 90, 105, 113, 117, 119, 120, 124, 126, and 130. Staff observed these violations at Property locations identified in the inspection report as WQ1 through WQ31.

Legal Requirements

The State Water Board adopted the Cannabis Policy and the Cannabis General Order on October 17, 2017, and updates on February 5, 2019, which remain in effect today. The purpose of the Cannabis Policy is to ensure that the discharge of waste and diversion of water associated with cannabis cultivation does not have a negative impact on water quality, aquatic habitat, riparian habitat, wetlands, and springs. The Cannabis Policy applies to cannabis cultivation activities throughout California including, Commercial Recreational, Commercial Medical, and Personal Use Medical. The Policy does not apply to recreational cannabis cultivation for personal use, which is limited to six plants under the Adult Use of Marijuana Act (Proposition 64, approved by California voters in November 2016).

The Cannabis General Order is the statewide water quality permit that implements the Cannabis Policy through the overarching general Waste Discharge Requirements (WDRs) in accordance with the California Water Code and is available for eligible cannabis cultivators to enroll under. The Cannabis General Order regulates waste discharges from cultivation sites including sediment, irrigation runoff, fertilizers, pesticides/herbicides, petroleum, agricultural related chemicals, cultivation related waste, and refuse. Threats of waste discharge may be from irrigation runoff, over fertilization, pond failure, road construction, grading activities, domestic and cultivation related waste, refuse placement, etc. All commercial cannabis cultivators must obtain coverage under the Cannabis General Order, including for both indoor and outdoor cultivation.

Cultivation activities on the Property requires conformance with the Cannabis Policy and enrollment in under the Cannabis General Order. For more information, please visit our website at:

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

As documented in the inspection report, the site conditions observed on the Property do not meet the requirements of the Cannabis Policy. Please provide a written response supporting documentation, including photos, if relevant, explaining how the Property will be restored in compliance with the Policy.

As documented in the inspection report, there are numerous existing stream crossings that must be upgraded or decommissioned to comply with the Basin Plan, which will require a water quality certification prior to conducting instream work.

The application for the water quality certification for cannabis cultivation-related projects is available here:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/cannabis/pdf/200204/RB1_Cannabis_WQC_401_App.pdf

Additional Potential Liabilities

The Regional Water Board is in the process of considering whether the violations of the California 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 California 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 of discharged waste, but not both, pursuant to Water Code section 13350.

Inspection Report Recommendations

As mentioned above, the September 26, 2022, Inspection Report provides recommendations to correct the alleged violations, as well as to address features and conditions that threaten to impact water quality.

Within 30 days of this letter, please advise Regional Water Board staff Ermias Berhe of your intentions, plan, and schedule to implement recommendations in the inspection report. If you have questions about what is required of you to comply with the requirements outlined above, and to advise as to your plan and schedule to correct the alleged violations, please contact Regional Water Board staff Ermias Berhe by email at Ermias.Berhe@Waterboards.ca.gov or by phone at 707-445-6128.

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.

You may also contact me at Mona.Dougherty@Waterboards.ca.gov or by phone at 707-445-6129. Additionally, we are available to meet with you if you wish to discuss this letter or our waste discharge regulatory programs in further detail.

Sincerely,

Mona Dougherty
Senior Water Resources Control Engineer

Filename 220926_Michael Harding_NOV_Report

Attachments: Attachment A - Regulatory Citations
 Attachment B - Property Inspection Report

Certified Mail – Return Receipt requested

cc: North Coast Regional Water Quality Control Board

Northcoast.Cannabis@waterboards.ca.gov

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Mendocino County Department of Planning and Building

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Department of Cannabis Control

Erin Wonder, erin.wonder@cannabis.ca.gov

Attachment A – Regulatory Citations

Regulatory Section	Citation
Basin Plan Section 4.2.1, Prohibition 1	Prohibits “[t]he discharge of soil, silt, bark, slash, sawdust, or other organic and earthen material from any logging, construction, or associated activity of whatever nature into any stream or watercourse in the basin in quantities deleterious to fish, wildlife, or other beneficial uses.”
Basin Plan Section 4.2.1, Prohibition 2	Prohibits “[t]he placing or disposal of soil, silt, bark, slash, sawdust, or other organic and earthen material from any logging, construction, or associated activity of whatever nature at locations where such material could pass into any stream or watercourse in the basin in quantities which could be deleterious to fish, wildlife, or other beneficial uses.”
California Water Code Section 13260	<p>“(a) Each of the following persons shall file with the appropriate regional board a report of the discharge, containing the information that may be required by the regional board:</p> <p style="padding-left: 40px;">(1) A person discharging waste, or proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than into a community sewer system.</p> <p style="padding-left: 40px;">(2) A person who is a citizen, domiciliary, or political agency or entity of this state discharging waste, or proposing to discharge waste, outside the boundaries of the state in a manner that could affect the quality of the waters of the state within any region.”</p>
California Water Code Section 13261(a)	“A person who fails to furnish a report or pay a fee under Section 13260 when so requested by a regional board is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).”
California Water Code Section 13264(a)	“No person shall initiate any new discharge of waste or make any material changes in any discharge, or initiate a discharge to, make any material changes in a discharge to, or construct, an injection well, prior to the filing of the report required by Section 13260 and no person shall take any of these actions after filing the report but before whichever of the following occurs first: (3) The issuance of waste discharge requirements pursuant to Section 13263. (2) The expiration of 140 days after compliance with Section 13260 if the waste

Regulatory Section	Citation
	to be discharged does not create or threaten to create a condition of pollution or nuisance and any of the following applies... (3) The issuance of a waiver pursuant to Section 13269.”
Cannabis Policy and General Order No. WQ 2019-0001-DWQ	State Water Resources Control Board Cannabis Cultivation Policy and General Waste Discharge Requirements Order No. WQ 2019-0001-DWQ for Discharges of Waste Associated with Cannabis Cultivation Activities https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/policy/final_cannabis_policy_with_attachment_a.pdf and https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf

Attachment B – Inspection Report



North Coast Regional Water Quality Control Board

TO: Mona Dougherty
FROM: Ermias Berhe
DATE: October 25, 2022

Inspection Report for September 26, 2022, Warrant Inspection of Mendocino County Assessor's Parcel Numbers 031-020-45-01, 031-020-46-01, and 031-020-54-01

File: Cannabis Program Inspections, Mendocino County, Michael Harding Property, CIWQS Place ID 883738

Property Information

County: Mendocino
APNs: 031-020-45-01, 031-020-46-01, and 031-020-54-01
Owner: Michael Harding
Size: 308.52
Watershed: Eel River Hydrologic Unit, Middle Main Eel River Hydrologic Area, Spy Rock Hydrologic Subarea; Cal Water 1111.420404; HUC-12 180101050206

Clean Water Act Section 303(d) Listings: The entire Middle Main Eel River Hydrologic Area is listed for Sediment/Siltation pollutant, Category 4a, and Tributaries to the Middle Main Eel River listed for Temperature, Category 4a, 2018 303(d) List approved by United States Environmental Protection Agency on June 9, 2021.

TMDLs: Middle Main Eel River is listed in the North Coast TMDL Projects for Sediment and Temperature Pollutants

Regulatory status with the Regional Water Board

Parcels (APNs) 031-020-45-01 and 031-020-46-01 were enrolled separately under the historical North Coast Regional Order 2015-0023 with WDIDs 1B16442CMEN and 1B170403CMEN, but never transferred to the statewide Cannabis General Order (CANGO) WQ 2019-0001-DWQ. Currently the property doesn't have coverage under CANGO.

Inspection information:

Date/time: September 26, 2022, 0900-1330

Type: Warrant

Attendance: Ermias Berhe, Engineering Geologist, North Coast Regional Water Board
Daniel Harrington, Environmental Scientist, California Department of Fish and Wildlife
Gagan Bhullar, Water Resources Control Engineer, Division of Water Rights
Anthony Southwood, Environmental Scientist, Division of Water Rights

Background/Objective:

Inspection objectives for Regional Water Board staff includes 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.

From the available Google Earth Pro Imagery, the property has three greenhouses in the north section, four greenhouses in the central section and two ponds (one north of the northern greenhouses and another pond east of the central greenhouses) in August 2017. Vegetation removal to construct a growing pad in the south and a pond to the west of the growing pad first appear in the southern portion of the property in March 2019. The eight greenhouses in the southern section of the property are visible starting July 2021.

Inspection Map

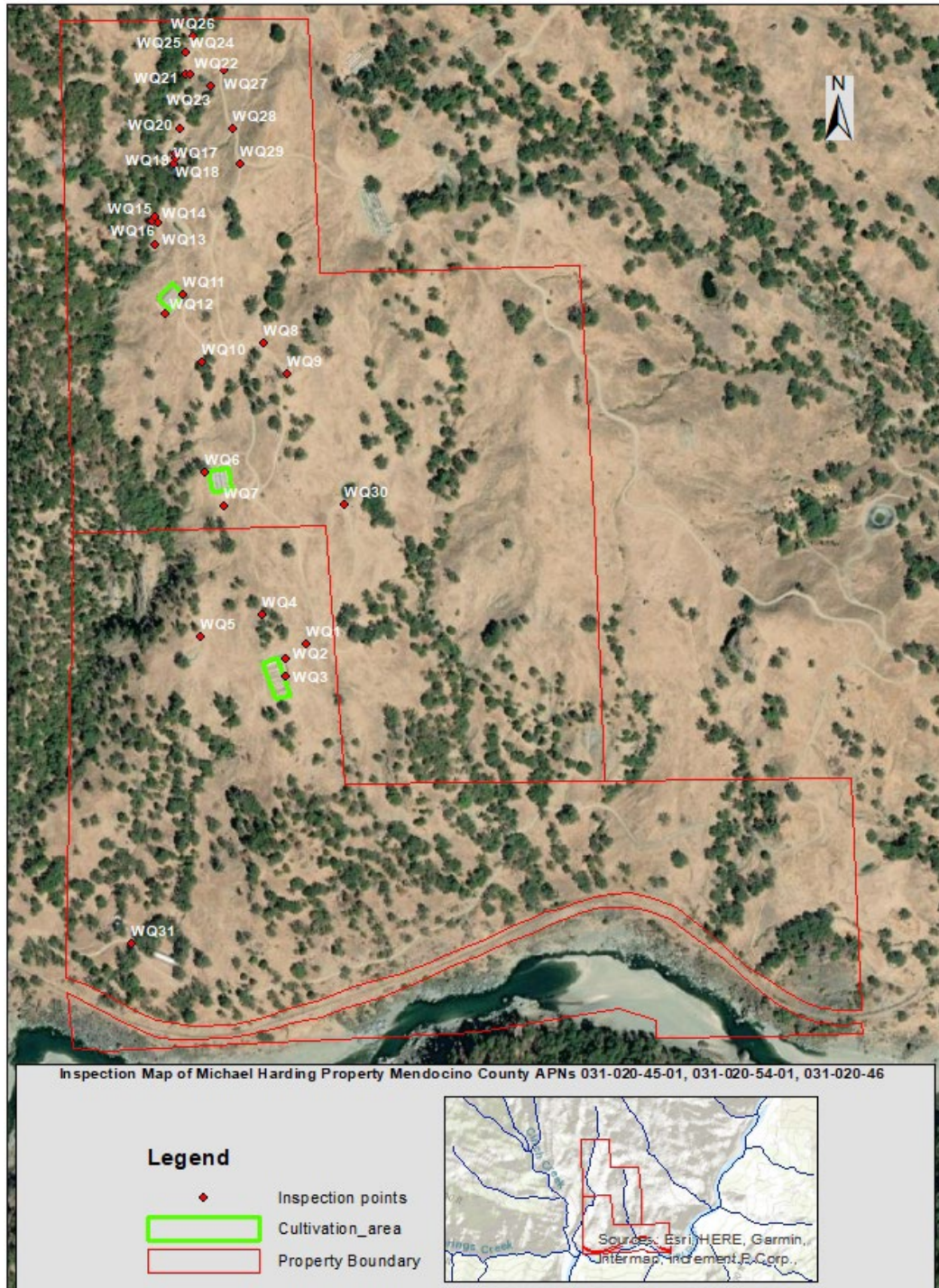


Figure 1: Map of the property, showing inspection points and cannabis cultivation related activities.

Inspection Observations

I inspected the subject property on September 26, 2022. Figure 1 is a site map showing inspection points discussed in Table 1. Below are inspection observations.

Cultivation areas:

I observed three cultivation areas on the property at inspection points WQ3, WQ6, WQ11. The cultivation area at inspection point WQ3 (approximately 17,000,000 square feet) is an outdoor cultivation in eight greenhouses. Cultivation area at WQ6 (approximately 13,000 square feet) is also an outdoor cultivation in four greenhouses, and cultivation area at WQ11 (approximately 85,000 square feet) is in three greenhouses.

Cultivation area at WQ3 is within the riparian setback and is located on steep slopes upstream of a Class III watercourse, threatening waste discharge. I also observed a channel dug on the southwestern portion of this cultivation area threatening waste discharge.

Stream Crossings:

I observed a total of seven watercourse crossings throughout the property at inspection points WQ1, WQ8, WQ18, WQ26, WQ27, WQ28, and WQ31. Stream Crossing at WQ1 is a plastic culvert showing erosion at the outlet and delivering sediment to surface water. Watercourse Crossing at WQ8 is a metal culvert showing erosion and sediment delivery at the outlet. Watercourse crossing at inspection point WQ18 is a fill stream crossing without any conveyance structure delivering sediment and waste to surface water. Watercourse Crossing at WQ22 is a plastic culvert acting as an outlet of an onstream pond and road crossing. Watercourse Crossing at WQ26 is a properly functioning metal culvert. Watercourse Crossing at inspection point WQ27 is a plastic culvert obstructed by rocks at the inlet and threatening road prism erosion. Watercourse Crossing at WQ28 is a metal culvert showing road prism erosion at the inlet and outlet. Watercourse Crossing at WQ31 is a properly functioning plastic culvert.

Water Storage and Use:

I observed water storage tanks at inspection points WQ4, WQ9, WQ10, WQ14, WQ24 and WQ25. The water storage tank at WQ14 is within the required riparian setback.

I observed four ponds throughout the property at inspection points WQ5, WQ16, WQ21, and WQ30. At the time of inspection, onstream ponds at inspection points WQ5, and WQ16 were dry, and their embankment looks stable. The onstream pond at inspection point WQ21 is partially filled with water has a stable and vegetated embankment. I also

observed another onstream pond holding water in the southern portion of the property at inspection point WQ30, showing erosion on the inside of its embankment threatening sediment delivery.

Fertilizers and soil amendments:

I observed uncontained fertilizers in the vicinity of inspection point WQ5. I also observed uncontained/improperly stored potting soil in the vicinity of cultivation area at WQ11 and WQ14.

Petroleum Products:

I observed improperly stored/uncontained generators and gasoline containers at inspection point WQ2, in the vicinity of inspection point WQ4, in the vicinity of inspection point WQ6, at inspection point WQ9, at inspection point WQ10 and in the vicinity of inspection point WQ11. I also observed improperly stored butane gas cylinders at inspection points WQ6 and WQ10.

Cultivation-related wastes:

I observed cannabis cultivation related waste and trash in the vicinity of cultivation areas at inspection points WQ2, WQ6 and WQ11, consisting of improperly stored plastic containers, plastic fencing nets, plastic covers, soil, and plant waste.

Road erosion:

I observed a collapsed road fill prism at inspection point WQ20 delivering sediment to receiving waters.

Refuse and human waste

I observed domestic waste pipe very close to a watercourse threatening waste discharge at inspection point WQ17.

Table 1: Map points with descriptions and water quality concerns

<i>Map point</i>	<i>Feature</i>	<i>Brief Description</i>	<i>Water Quality Concern</i>	<i>Associate d Photo(s)</i>
WQ2, WQ6, and WQ12	Cultivation areas	Cannabis Cultivation without coverage at WQ2, WQ6 and WQ12, and Cultivation area at WQ12 is within the required riparian setback	Threatened waste discharge to receiving waters	1-3
WQ5, WQ13, WQ22, and WQ30	Onstream ponds	Onstream pond at WQ10 is showing erosion on the inside face of the embankment	Discharge of sediment and waste to receiving waters	4-8
WQ1, WQ8, WQ18, WQ26, WQ27, WQ28, and WQ31	stream crossings	Stream Crossings at inspection points WQ1, WQ8, WQ19 WQ27 and 28 are improperly maintained, installed, or sized stream crossings	Discharge of sediment and waste to receiving waters	9-17
WQ4, WQ9, WQ10, and WQ14	Water Storage	WQ14 is within the required riparian setback of a Class III watercourse	Threatened discharge of waste to receiving waters	24-25,30, and 34
WQ2, WQ4, WQ9 and WQ10	Gasoline/containers, generators, butane cylinders	Uncontained or improperly stored gasoline/containers, generators, and butane cylinders	Threatened discharge of waste to receiving waters	18,22,24, 25,26, and 28
WQ2, WQ3, WQ10 and WQ11	Trash, soil, plant waste	Uncontained or improperly stored trash, soil, and plant waste	Threatened discharge of waste to receiving waters	18,19,23, 27, and 29
WQ4, WQ11, WQ14	Fertilizers and soil amendments	Uncontained, improperly disposed fertilizers/containers and soil amendments	Threatened discharge of waste to receiving waters	21,29,31

<i>Map point</i>	<i>Feature</i>	<i>Brief Description</i>	<i>Water Quality Concern</i>	<i>Associated Photo(s)</i>
WQ20	Road erosion	Collapsed roadside fill prism	Discharge of sediment	32
WQ19	Human and household waste	Domestic wastewater pipe close to a watercourse	Threatened discharge of waste to receiving waters	33

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 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. 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 Cannabis General Order (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). More information about the CANGO can be found at this hyperlink:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf#cango101717.pdf
3. Collect and dispose of or contain all refuse and cultivation-related wastes in a location and manner to minimize potential for these wastes to enter or be transported into receiving waters.

4. Properly contain/store petroleum products, generators, water pumps to minimize potential discharge of waste to surface waters during storm event.
5. Work with Mendocino County to ensure that all domestic and human wastes are collected and disposed of consistent with applicable County requirements.
6. Work with CDFW and the State Water Resources Control Board's Division of Water Rights (DIV) to determine and secure any applicable permits or licensing required for surface water diversion, storage, and use on the site. If the existing surface water diversions do not meet applicable CDFW or DIV requirements, remove diversion infrastructure from surface waters and ensure that restoration plans developed pursuant to Recommendation 1, above, include provisions for restoring any instream or riparian disturbance associated with this features or removal thereof.
7. 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/cannabis/pdf/220615/rb1_cannabis_wqc401.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 right to take any enforcement action authorized by law.

PHOTO APPENDIX - All photos taken by Ermias Berhe unless noted otherwise



Photo 1 – Cultivation area at inspection point WQ2



Photo 2 – Cannabis Cultivation greenhouses at inspection point WQ6



Photo 3 – Cannabis cultivation greenhouses within the required setback of a watercourse at inspection point WQ12



Photo 4 – Dry onstream pond at inspection point WQ5 without any engineered outflow



Photo 5 – Onstream pond at inspection point WQ13



Photo 6 – Onstream pond at inspection point WQ22



Photo 7 - Onstream pond at inspection point WQ30 actively used for cannabis irrigation



Photo 8 - Pond embankment erosion threatening sediment delivery at inspection point WQ30



Photo 9 Culvert outlet delivering sediment to surface water at inspection point WQ1



Photo 10 - Culvert outlet showing sediment delivery at the stream channel at inspection point WQ8



Photo 11 – Properly installed culvert outlet of an onstream pond at inspection point WQ16



Photo 12 – A fill stream crossing with some trash wood at inspection point WQ18



Photo 13 - A properly functioning culverted stream crossing at inspection point WQ26



Photo 14 – Plastic culverted watercourse crossing inlet obstructed with rocks at inspection point WQ27



Photo 15 – Road erosion near the inlet of a metal culverted watercourse at inspection point WQ28



Photo 16 – Road erosion near the outlet at inspection point WQ28



Photo 17 – Properly functioning culvert outlet at inspection point WQ31



Photo 18 –uncontained generator and plastic containers in the vicinity of cultivation area at inspection point WQ2



Photo 19 – Improperly stored/disposed plastic covers in the vicinity of cultivation area inspection point WQ2



Photo 20 – Improperly stored/disposed plant and soil in the vicinity of cultivation area at inspection point WQ3



Photo 21 – Uncontained fertilizers at inspection point WQ4



Photo 22 – uncontained generator and gasoline tank at WQ4



Photo 23 – improperly disposed/uncontained plant waste in the vicinity of cultivation area at inspection point WQ6



Photo 24 – Improperly stored gasoline tanks, water pump and water storage tanks at WQ9



Photo 25 – water storage tanks, improperly stored gasoline tank and pump at inspection point WQ10



Photo 26 – improperly stored gas cylinder in the vicinity of inspection point WQ10



Photo 27 – improperly stored plastic nets, plastic covers, and containers in the vicinity of inspection point WQ10



Photo 28 – improperly stored generator near the vicinity of cultivation area at inspection point WQ11



Photo 29– improperly stored/disposed soil and plastic containers near the vicinity of cultivation area at inspection point WQ11



Photo 30 – Water storage tanks with riparian setback of a watercourse on the right above the tanks at inspection point WQ14



Photo 31 – improperly stored fertilizers or containers within riparian setback at inspection point WQ14



Photo 32 – collapsed roadside fill prism at inspection point WQ20



Photo 33 – Domestic wastewater pipe near a class III watercourse at inspection point WQ19



Photo 34 – water storage tanks at inspection point WQ4