



North Coast Regional Water Quality Control Board

August 25, 2023

Evan Henshaw Plath
955 12th St
Arcata, CA 95521

GLS Tracking No: 560010381

Dear Evan Henshaw-Plath:

**Subject: Notice of Violation, Transmittal of Inspection Report of July 26, 2023
Inspection of Trinity County Assessor's Parcel Number 011-120-014**

File: Cannabis Inspections, Trinity County 2023, CIWQS Place ID 889722

THIS LETTER HAS RECOMMENDATIONS 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 Trinity County Assessor's Parcel Number (APN) 011-120-014 (the Property):

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

On July 26, 2023, staff of the North Coast Regional Water Quality Control Board (Regional Water Board) inspected the Property and observed site conditions that have resulted in unauthorized discharges of waste and threatened discharges of waste to waters of the state and the United States.

According to our records, at the time of the inspection, the cannabis cultivation operation located on this Property was not enrolled for coverage under 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 (Cannabis General Order).

HECTOR BEDOLLA, CHAIR | VALERIE QUINTO, EXECUTIVE OFFICER

This letter directs you to address the violations noticed herein. Within 30 days, please contact staff to discuss your plan to correct the observed violations and implement the recommendations withing the staff inspection report.

Background

The Property is located in the Corral Creek watershed near the community of Burnt Ranch in the Lower Trinity River watershed. LandVision records show that the Property ownership was last transferred on June 2, 2009 and is currently owned by Evan Henshaw-Plath

On July 26, 2023, during the execution of a criminal search warrant served by the California Department of Fish and Wildlife (CDFW), Regional Water Board staff inspected the Property, accompanied by representatives from CDFW and the State Water Board Division of Water Rights. The purpose of the inspection was to evaluate site development and conditions on the Property, and to identify and assess any impacts or threatened impacts to the quality and beneficial uses of waters of the state, which include both surface water and groundwater. During the inspection, staff observed cannabis cultivation operations of sufficient size and scope to require regulatory coverage under the Cannabis General Order. According to CDFW personnel, required state and local authorizations for commercial cannabis cultivation are not associated with the Property.

Attached is a copy of the water quality inspection report (Attachment B – July 26, 2023 Water Quality Inspection Report). Please review the inspection report carefully and completely. The inspection report contains recommendations for correcting observed violations.

Relevant Requirements

During the inspection, 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 July 26, 2023 inspection report, staff observed large-scale cannabis cultivation and associated activities conducted in a manner that has resulted in unauthorized discharges and threats of discharge to waters of the state, in violation of Water Code section 13260. These Property conditions also violate the Cannabis Policy.

During the inspection, staff observed Property conditions of concern to water quality, including:

1. Unauthorized cannabis cultivation. According to CDFW, the Property did not have the requisite regulatory coverage for commercial scale cultivation, including

a county permit and state license. The Regional Water Board has no record of enrollment under the Cannabis General Order.

2. Improper storage, handling and containment of fertilizers, resulting in threats of discharges to land and threats of discharges to surface waters via stormwater runoff.
3. Improper storage, containment and disposal of cultivation related plastic refuse.
4. Disturbed soil areas throughout the Property without adequate stabilization.
5. Steep, poorly maintained roads causing concentration of stormwater runoff, erosion, transport and delivery of sediment to waters of the state with threats to surface water habitat and water quality.
6. A pond constructed near Corral Creek with surface water diversion, discharge to Corral Creek, and a berm along Corral Creek.
7. A footbridge that appears to be constructed at an elevation that could inhibit streamflow and debris of Corral Creek.

These features and property conditions of concern lacked measures to prevent discharge and the threat of discharge of waste to waters of the state, in violation of Water Code section 13260, the Basin Plan section 4.2.1 Prohibition 2, and the Cannabis Policy.

The pond outflow to Corral Creek is an unauthorized discharge in violation of Water Code 13264.

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 areas 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 Property conditions observed on the Property do not meet the requirements of the Cannabis Policy. Please provide a written response supporting documentation, including relevant photos, explaining when and how the Property will be restored in compliance with the Policy.

As documented in the inspection report, the features at Point Feature 8 is located in surface waters and must be remediated to comply with the Basin Plan and the Water Code, 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 Policy warrant further enforcement. We encourage you to take steps, to correct the violations as soon as possible, securing any applicable permits from this and other agencies prior to conducting work. Please note that the existing conditions, as observed and documented in the inspection report, may represent continuing violations of the Water Code.

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. Administrative civil liabilities may be assessed on a daily basis in the amount up to \$10,000 for each day the violation occurs and \$10/gallon beyond the first 1,000 gallons not cleaned up for actual discharges to waters of the United States without a permit pursuant to Water Code section 13385.

Inspection Report Recommendations

As mentioned above, the July 26, 2023 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 our staff, Adona White, 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 our staff Adona White by email at Adona.White@waterboards.ca.gov or by phone at 707-576-2672.

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 Jeremiah.Puget@waterboards.ca.gov or by phone at 707-576-2835. 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,

Jeremiah Puget
Senior Environmental Scientist
Enforcement Unit

Attachments: Attachment A – Regulatory Citations
Attachment B – July 26, 2023 Water Quality Inspection Report

Cc: **North Coast Regional Water Quality Control Board**
Northcoast.Cannabis@waterboards.ca.gov
Claudia Villacorta, Claudia.Villacorta@waterboards.ca.gov
Kason Grady, Kason.Grady@waterboards.ca.gov
Jeremiah Puget, Jeremiah.Puget@waterboards.ca.gov
Adona White, Adona.White@waterboards.ca.gov

State Water Resources Control Board Office of Enforcement

Jordan Zakaria, Jordan.Zakaria@waterboards.ca.gov
Michael Buckman, Michael.Buckman@waterboards.ca.gov

State Water Resources Control Board Division of Water Rights

Taro Murano, Taro.Murano@waterboards.ca.gov
Stormer Feiler, Stormer.Feiler@waterboards.ca.gov
Anthony Southwood, Anthony.Southwood@waterboards.ca.gov

California Department of Fish and Wildlife

Brendan Lynch, Brendan.Lynch@wildlife.ca.gov
Scott Bauer, Scott.Bauer@wildlife.ca.gov
Ryan Bourque, Ryan.Bourque@wildlife.ca.gov

Trinity County

Krystalynne Anderson, KAnderson@trinitycounty.org
Rikki Townsend, RTownzen@trinitycounty.org
Nathan Trujillo, NTrujillo@trinitycounty.org

Department of Cannabis Control

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

Attachment A – Regulatory Citations

Table 1 Regulatory Citations

Regulatory Section	Citation
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>(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>(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)	<p>“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).”</p>
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: (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 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.”</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>
Cannabis Policy and General Order No. WQ 2019-0001-DWQ	<p>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</p> <p>Available at: https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/policy/final_cannabis_policy_with_attach_a.pdf_and https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf)</p>

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.”
Federal Clean Water Act Section 301 (a):	Section 301(a) provides that subject to certain exceptions, “the discharge of any pollutant by any person shall be unlawful.” 33 U.S.C. § 1311(a). One of the exceptions allowed for under the Clean Water Act is the discharge from a dredge and fill activity under the auspices of § 404 and 401 of the Clean Water Act. 33 U.S.C. § 1342. The Clean Water Act prohibits the discharge of any pollutant from a point source into waters of the United States without a section 404 dredge and fill 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”
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 portion of a water of the United States with dry land or changing the bottom elevation of any portion 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
Attachment B**

Cannabis Water Quality Inspection Report

Evan Henshaw-Plath, Trinity County APN 011-120-014

	Inspection Details
Inspection Date & Time	July 26, 2023; 9:23
Address/Location	11240 Corral Bottom Road, Big Bar, CA 96010 (40.698305, -123.366155)
County	Trinity
Assessor's Parcel Number (APN)	TRI 011-120-014
Watershed	Corral Creek, Lower Trinity HA, Trinity River HU
Property Owner/Operator Name	Evan Henshaw-Plath
Mailing Addresses	955 12 th St Arcata, CA 95521
Agency Responsible for Warrant	California Department of Fish and Wildlife (CDFW)
Person Responsible for Warrant	Warden Brendan Lynch
Warrant Date	July 26, 2023
Warrant Type	Criminal Search
Lead Inspector Name	Adona White, PE, Water Resources Control Engineer
Office/Regional Board	North Coast Regional Water Quality Control Board
Other Personnel Onsite	Representatives from CDFW and State Water Resources Control Board Division of Water Rights
Author of Report	Adona White
CIWQS Identifiers	WDID No. 1_53MJ000405; CIWQS Place ID 889722

Inspection Observations

The inspection maps are shown in Figures 2 and 3, labeled with the locations described at the following features of concern to water quality.

The following features are located between Corral Bottom Road and Corral Bottom Creek:

Point Feature 1: 18" culvert watercourse crossing on Corral Bottom Road; 24" channel.

Point Feature 2: Shed.

Polygon Feature 3: Pond located next to Corral Creek. Approximately 10,000 square feet of surface area.

Point Feature 4: Inflow channel to pond from Corral Creek.

Point Feature 5: Outlet from pond via open channel to Corral Creek.

Point Feature 9: Pond berm is constructed within the stream gravels. The placed material poses a threat of erosion and discharge and an impediment to the free flow of Corral Creek.

Point Feature 7: Foot bridge over Corral Creek. I observed some debris racking on nearby trees; voids are on both banks. It appears that the bridge deck is approximately at the elevation of bankfull stage. Sand deposits were evident at the right bank bridge abutment. May be an impediment to the free flow of Corral Creek and pose a threat of sediment discharge.

Point Feature 8: Erosional void on right bank with exposed white pipe.

The following features are located between west of Corral Bottom Road on the hillslope:

Steep road with switchbacks

Point Feature 10: Water storage tanks located on a landing at the road switch back.

Point Feature 11: Well located at the edge of outdoor cultivation area.

Polygon Feature 12: Outdoor cultivation area with pesticides.

Point Feature 12: Box of fertilizer.

Point Feature 13: water storage and feed tanks with fertilizer containers and gas powered pump.

Polygon Feature 13: Approximately 30,000 square feet of disturbed area that was cleared, stumps removed, and converted to three stacked flats being used as cultivation area.

Point Feature 14: skid steer with stains from spray of petroleum products on ground.

Point Feature 15: swale

Point Feature 16: Rilled road surface through the outdoor cultivation area.

Polygon Feature 16: In a second conversion area of approximately 27,000 square feet a cut and fill flat was constructed with cut and fill. Greenhouse cultivation occupied a portion of the flat. The remainder of the flat is covered with spread potting soil. Fertilizers are stored in a shipping container.

Point Feature 17: building and pit privy.

Inspection Recommendations

1. Hire a qualified professional to:
 - a. Assess the Property, including, at a minimum the pond (Polygon Feature 3), the footbridge (Point Feature 7) the converted areas and steep access road used for cultivation-related activities.
 - b. Develop a treatment plan to guide that the cleanup and remediation of assessed features and stabilize disturbed areas to ensure they will no longer pose a threat of discharge or impacts to the quality of waters of the state.
2. Contact me at Adona.White@waterboards.ca.gov or 707-576-2672 to discuss your plans to cleanup and remediate the site conditions that threaten water quality.
3. Ensure cannabis cultivation activities are in conformance with state and local requirements. If cultivation continues, enrolled under the Cannabis General Order and conform with the terms and conditions therein designed to ensure water quality is adequately protected from threats of waste discharges. If cultivation activities cease, remove related infrastructure and cleanup materials and provide photos.
4. Stabilize the disturbed area associated within the disturbed areas to prevent erosion and threats to waters of the state.
5. Maintain roads to prevent erosion, transport, and threat of sediment delivery to waters of the state. To minimize concentrated runoff on the road surface,

maintain drainage breaks at adequate spacing to prevent surface rills. Avoid discharge to fill or swales.

6. Cleanup fertilizer containers and feed tanks and prevent further discharge of feed water to land in a manner that threatens water quality.
7. Properly dispose of waste including but not limited to trash, fertilizer, pesticide and petroleum containers, plastic tarps and sheeting at a legal facility.
8. Work with Trinity County to ensure that domestic waste is handled in a manner that is protective of water quality and in conformance with the State Water Board Onsite Waste Treatment Policy.
9. Work with CDFW and Division of Water Rights to ensure that any surface water diversion, storage and use are in conformance with Fish and Game Code and Water Code.
10. If instream work is proposed as part of the proposed cleanup and remediation, including at the pond (Polygon Feature 3) and the footbridge (Point Feature 7), submit an application for instream work describing plans to ensure the work is in conformance with the Basin Plan, the Water Code, and the federal Clean Water Act.

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.

Inspection Maps

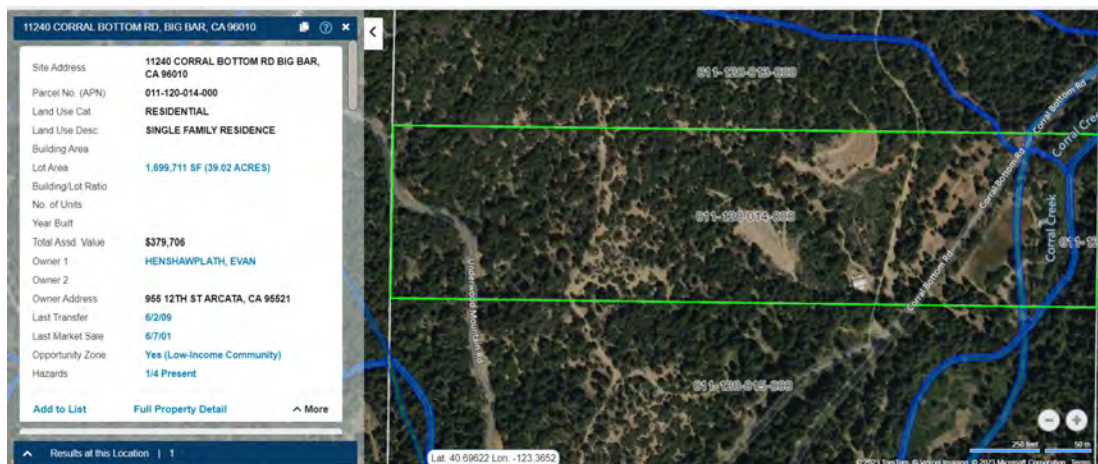


Figure 1. Property map and ownership information.



Figure 2. Inspection map with aerial imagery showing the point, line, and polygon feature locations of interest described in the text.

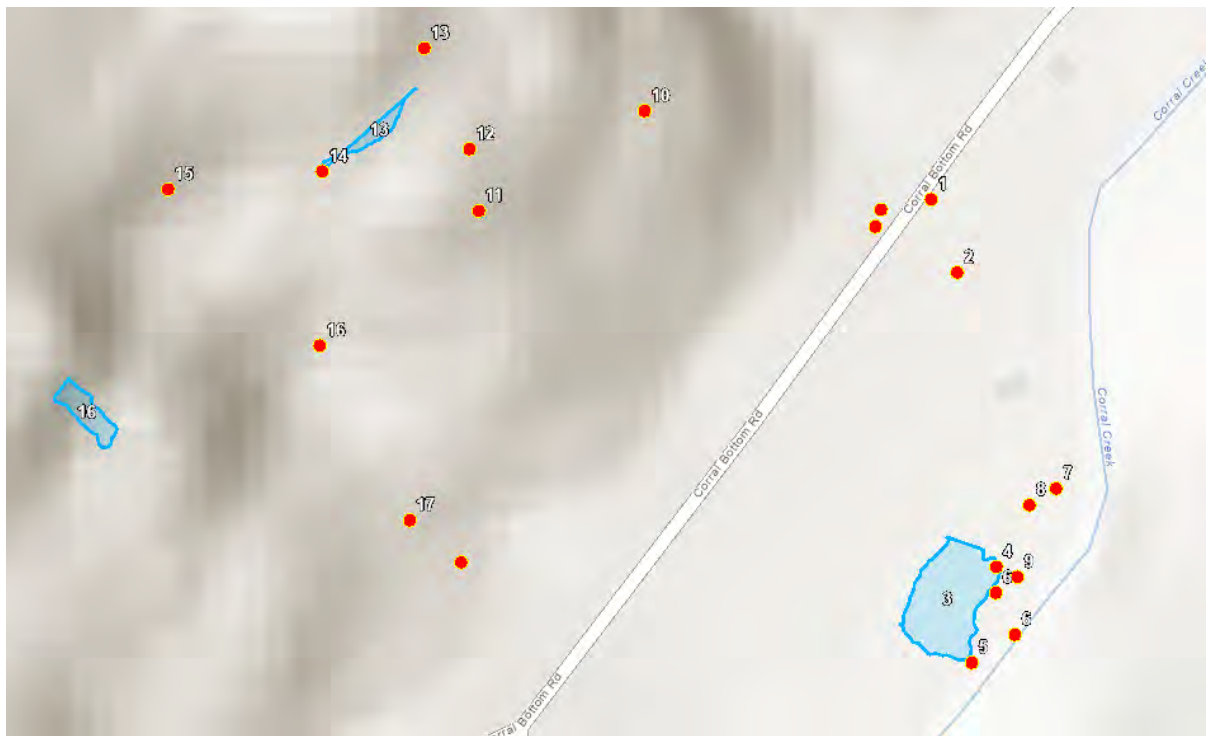


Figure 3 Inspection map with terrain showing features of interest described in the text.

Inspection Photographs

All photographs taken by Adona White on July 26, 2023.



Figure 4. Polygon Feature 3 – pond located next to Corral Creek, with inflow and outflow structures from Corral Creek and a berm along the edge of Corral Creek



Figure 5. Corral Creek next to pond.



Figure 6. Point Feature 4 - Inlet channel from Corral Creek.



Figure 7. Point Feature 6 - Constructed channel to pond from Corral Creek.



Figure 8. Point Feature 9 – Pond berm along Corral Creek.



Figure 9. Point Feature 9: Toe of pond berm located next to wet channel of Corral Creek.



Figure 10. Point Feature 7 - Looking upstream at footbridge over Corral Creek. Debris is raked in nearby trees. Erosional voids are evident on both banks.



Figure 11. Point Feature 7 - Looking downstream from footbridge.



Figure 12. Point Feature 7 – Recent sand deposits on ground surface next to downstream side of right bank abutment, close in elevation to the bottom of the footbridge deck.



Figure 13. Point Feature 10 - Switchback in steep road to converted areas being used for cultivation-related activities.



Figure 14. Point Feature 11 – well next to outdoor cultivation area.



Figure 15. Point Feature 13 – water storage and feed tanks with gas powered generator for pump and fertilizers.



Figure 16. Point Feature 13 - Cultivation-related refuse.



Figure 17. Point Feature 14 – skid steer with spray of dark fluid on ground.



Figure 18. Point Feature 16 – rilled road surface.



Figure 19. Point Feature 17 – building with refuse.



Figure 20. Point Feature 17 - Pit privy

-FIELD NOTICE-
WATER QUALITY VIOLATIONS



NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD STAFF HAVE OBSERVED CERTAIN VIOLATIONS OF THE CALIFORNIA WATER CODE RELATED TO WATER QUALITY AND CANNABIS CULTIVATION ON THIS PROPERTY

I. Inspection Information
Date: 7/26/23
Inspector: Adana White
Operator: _____
Address: 11270 Central Express Rd
APN: 011-120-014-000
11270

II. California Water Code Violations

Water Code 13280 - Discharge of pollutants into waters of the state without a permit, or discharge of pollutants into waters of the state in violation of a permit, or discharge of pollutants into waters of the state in violation of a permit, or discharge of pollutants into waters of the state in violation of a permit. See Section 6.

Water Code 13294 - Discharge of waste without regulatory coverage or without a permit, or discharge of waste without regulatory coverage. See Section 6.

These violations may subject you to civil or criminal liability. See reverse for details.

III. Conditions of Discharge or Proposed/Unauthorized Discharge Affecting Waters of the State (WQCA)

Actual Discharge	Discharge	Waste description and location
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Serbsand/FK
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Insulating Material
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Ruoff
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Fertilizer/Pesticides
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pesticides/Chemicals
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Cultivation Waste
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Refused/Spills/Human Waste
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Other: <u>commercial cultivation</u>

Notes: _____

Unauthorized discharge of waste as defined in Water Code section 13280 may subject you to fines of up to \$5,000/day per violation, pursuant to Water Code section 13290. See reverse for code list.

IV. Actions To Be Taken
YOU ARE HEREBY PROVIDED NOTICE OF THESE VIOLATIONS AND THE NEED TO RESOLVE THEM.
Please contact: Adana White @ adana.white @waterboards.ca.gov
or (707) 576-7676 within 72 hours to discuss your violation to correct these violations.

Please note: The violations outlined in this notice are not a description of all recorded Water Code violations on the property. You will receive a complete Inspection Report and Notice of Violation in approximately 30 days. Additional actions may also be required to address violations documented by other local or state department agencies. You must comply with all applicable requirements for cleanup activities which may require permits. Failure to comply with these permits and comply with applicable requirements may subject you to additional violations and penalties.

Inspector Signature: [Signature] Date: 7/26/23
Delivery Method of Notice: left onsite

Figure 21. Field form I left onsite. I received a call from Evan Henshaw-Plath, as requested.