

Water Resources Protection Plan

APN 524-112-002



May 2018

Prepared for:

**California Regional Water Quality
Control Board**
North Coast Region
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Cover photo: View from the parcel looking east.

1 PURPOSE AND SCOPE

California Water Code section 13260(a) requires that 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, shall file with the appropriate regional water board a Report of Waste Discharge (ROWD) containing such information and data as may be required by the Regional Water Board. The Regional Water Board may waive the requirements of Water Code section 13260 for specific types of discharges if the waiver is consistent with the Basin Plan and in the public interest. Any waiver is conditional and may be terminated at any time. A waiver should include monitoring requirements to verify the adequacy and effectiveness of the waiver's condition.

Order No. R1-2015-0023 (Waiver of Waste Discharge Requirements and General Water Quality Certification for Discharges of Waste Resulting from Cannabis Cultivation and Associated Activities or Operations with Similar Environmental Effects In the North Coast Region) of the California Water Code Section 13260(a) conditionally waives the requirement to file a ROWD for discharges and associated activities described in finding 4. As part of Order No. R1-2015-0023, applicants meeting Tier 2 or 3 cultivation status, based on the size of their cultivation footprint and risk to water quality, must submit a Water Resource Protection Plan. Order No. R1-2015-0023 states that:

"Tier 2 Dischargers and Tier 3 Dischargers who intend to cultivate cannabis before, during, or following site cleanup activities shall develop and implement a Water Resource Protection Plan that contains the elements listed and addressed below. Dischargers must keep this plan on site, and produce it upon request by Regional Water Board staff. Management practices shall be properly designed and installed, and assessed periodically for effectiveness. If a management measure is found to be ineffective, the plan must be adapted and implemented to incorporate new or additional management practices to meet standard conditions. Dischargers shall certify annually to the Regional Water Board individually or through an approved third party program that the plan is being implemented and is effectively protecting water quality, and report on progress in implementing site improvements intended to bring the site into compliance with all conditions of this Order."

This document serves as the Water Resources Protection Plan (WRPP) for APN 524-112-002 submitted on behalf of the property owner and discharger, WURM Assets, LLC. This parcel and associated cannabis cultivation currently meet the conditions of a Tier 2 cultivation site.

2 METHODS

2.1 Site Assessment

Sweet River Sciences was contracted to perform a site assessment and develop the application for Regional Water Board permitting and the WRPP for APN 530-151-001. Sweet River Sciences visited the property on multiple occasions, the first being on Dec 15th 2016, to perform site assessments (Property Map – Figure 1). The site inspection included an inventory, assessment,

and photo documentation of water resources, road and associated drainage network, cultivation areas, and infrastructure (Site Plan – Figure 2).

This Project description and WRPP has been prepared, and is based on a site inspection and evaluation, by Dr. Joshua Strange who is the Principal Scientist at Sweet River Sciences (joshua@sweetriversciences.com). Sweet River Sciences specializes in understanding complex river and water issues and technical information in order to provide easy to understand summaries, win-win solutions, innovative restoration designs, fundable study plans, sustainable water planning, land use planning and remediation, and reliable expertise with a proven record of excellence and success. Dr. Strange has over 15 years of experience in fisheries biology and aquatic ecology, and collaborates with a variety of specialists in forestry, geology, engineering, archeology, hydrology, water rights law, statistical analysis, general contracting, and heavy equipment operation.

2.1.1 Drainage structure sizing

The private road network is generally in good condition with only portions in use currently as cultivation related activities is confined along the main thoroughfare on the property (Figure 1). Due largely to its ridgetop location, there are no stream crossings or related stream channel culverts on the parcel, and as such there is no need for sizing culverts or other related drainage structures. The private roads on the parcel were subject to a thorough review and improvement plan developed by Pacific Watershed Associates (Appendix A). The recommended road improvements consists of rolling dips and limited gravel placement, which do not require drainage structure sizing.



Figure 1. Property and vicinity map for APN 524-112-002, located within the watershed of an unnamed tributary to the lower South Fork Trinity River in northeastern Humboldt County near the community of Willow Creek. Parcel boundaries are approximate and are not based on a land survey (source: Humboldt GIS).



Figure 2. Site plan for APN 524-112-002, showing all cultivation related infrastructure and areas of disturbance. Parcel boundaries are approximate and are not based on a land survey (source: Humboldt GIS).

3 RESULTS: CURRENT CONDITIONS & RECOMMENDED IMPROVEMENTS

APN 524-112-002 is a 136 acre TPZ parcel located adjacent to the paved public road USFS Route 6N06, in the lower South Fork Trinity River watershed (Figure 1). Developments on the parcel include cabins, processing sheds, storage sheds, hoop houses, cultivation areas, off-channel rainwater catchment pond with a capacity of ~675,000 gallons, a domestic water system from the surface water POD, and a private road network (Site Plan – Figure 2). Proposed commercial cannabis cultivation areas total 32,000 ft² (mixed-light and outdoor) as specified in the permit application to Humboldt County under the pre-2016 qualifications. Cultivation areas may be consolidated in the future under County supervision for more environmentally efficient operations. The driveway and graded clearings that cultivation premises are located on appear to be associated with past timber harvest activities and are located along a ridgetop (Figure 3). A less-than-3-acre timber conversion evaluation has been conducted by Timberland Resource Consultants and grading plans by Trinity Valley Consulting Engineers for the graded flats and the rainwater catchment pond. No egregious erosional features are associated with graded areas and the landforms on the parcel appear to be stable with rocky soils predominating.

The private roads on the property that are in use are generally in good condition with no stream crossing or egregious erosional features in need of remediation. Minor road drainage improvements are needed in the form of rolling dips and gravel placement in selected locations. The proposed drainage improvements are summarized in Appendix A. Implementation of these proposed improvements are subject to approval by the Regional Water Board and will follow the relevant Best Management Practices as identified in Appendix B of Order No. R1-2015-0023. In the future, State regulations will also be incorporated in included in an updated WRPP as appropriate starting in July of 2019.

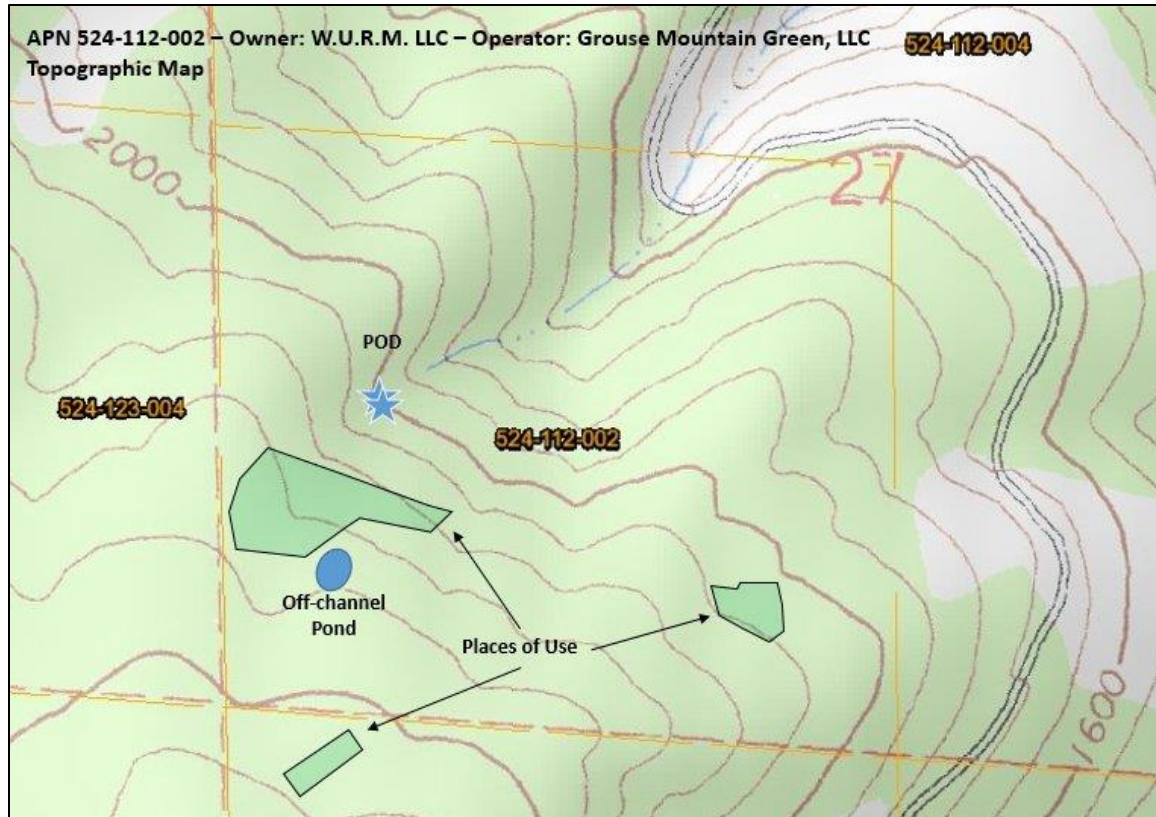


Figure 3. Contour map topography for APN 524-112-002, with polygons showing the general area of cannabis related developments and cultivation under current conditions in addition to the location of the rainwater catchment pond and domestic PODs. Source: Humboldt GIS.

3.1 Water Resources

Based on the site inspection and assessment, the Project parcel contains at least one blue line Class II stream channel and several smaller Class III channels, all of which are unnamed tributaries to the lower South Fork Trinity River. Given its ridgetop location, channels are steep with low flows and limited aquatic habitat. All setbacks from cultivation areas to stream channels are sufficient per riparian management requirements.

3.2 Road and Drainage Network

The parcel is accessed by the paved public road USFS Route 6N06. This parcel is primarily used during three seasons, and the private roads on the property are generally in good condition with the need for some added or improved rolling dips. However, there are no egregious erosional features on the private roads that need urgent remediation and there are no stream crossings. A more complete road assessment and maintenance plan has been completed by Pacific Watershed Associates (with summary of road improvements in Appendix A), and grading surveys and soil stability analysis have been conducted by Trinity Valley Consulting Engineers for graded areas (as well as the rainwater catchment pond).

3.2.1 Site-specific road-drainage and related upgrade specifications

- Site-specific road-drainage and related upgrades are specified in Appendix A developed as part of the road assessment conducted by Pacific Watershed Associates.

3.2.2 General road treatments

- Monitor and add rolling dips and water bars to road surfaces as needed as evidenced by any future riling formation.

3.3 Cultivation Areas

The proposed cultivation area of 32,000 ft² (pending County review) is comprised of three separate flats (see Site Plan – Figure 2). Cultivation occurs on natural terraces with gentle slopes (Figure 3) grading on preexisting logging decks that were built, along with the road network, as part of prior timber harvest activities. Cultivation includes use of containers, holes, and raised beds with open air and hoop houses (Appendix B). Related developments on the premises include a residence with septic, several storage sheds, two processing shops with ancillary immature plant propagation, two diesel generators shed, solar power, hoop houses, a private road network, off-channel rainwater catchment pond for irrigation, and a basic domestic water system from the POD (Figure 2). Electricity is provided primarily by generator power with proper fuel containment (Appendix B), which is augmented by solar power. These outdoor cultivation areas are grown without supplemental lighting, although the ancillary propagation requires the use of supplemental lighting. The mixed-light greenhouses and hoop houses allow light deprivation and up to two harvest cycles per year. Growing medium used consists of potting soil mixes in grow bags that will be reused for multiple years with annual amendments prior to the growing season and fertigation during the growing season following organic practices. Both cultivation areas are outside of any setbacks required from surface waters and other critical resources.

4 CHEMICAL, FERTILIZER, & PETROLEUM MANAGEMENT

The applicant does not currently use any synthetic fertilizers or pesticides, and in the future any use of cultivation produces for fertilization or pest control will follow any applicable guidelines from the State, County, or the Water Board regarding approved fertilizers and pesticides under their cannabis programs. Covered and enclosed sheds provide appropriate storage for fertilizers, organic pesticides, and fuel for tools. Generators are currently used for electrical generation and have shed roofs and proper fuel containment (Appendix B).

Potting soil is reused indefinitely with soil amendments added approximately every two to four cultivation cycles. Products used for soil amending include organic chicken manure, bat guano, and bone meal. For additional fertilization, fertigation is used throughout growing season consisting of a compost tea brewed on-site with addition of bat guano, sea weed extracts, alfalfa meal, fish emulsion, Si concentrate, Cal/Mg concentrate, and beneficial microbes. Pre-prepared liquid commercial OMRI approved fertilizer products may be tested or used to augment the above fertilization program in accordance with State and local guidelines and regulations. For pest and pathogen control, foliar sprays are used through the growing season consisting of alternating treatments of the following to prevent or control fungal infections and mites: compost tea, Lost Coast Plant Therapy (soybean oil, soap, isopropyl alcohol, citric acid, peppermint essential oil, and

sodium citrate), Neem tree oil, hydrogen peroxide, and Sulphur. The following additional organic pest-control, commercial products may be used in addition to those above on an as need basis: Pyganic, Zerotel, Grandevo PTO, and/or Regalia PTO (Extract of *Reynoutria sachalinensis* 5%). The amount and timing and use of all of the above products will vary depending on season, strain, micro-climate, and plant condition within an Integrated Pest Management program that relies on monitoring and early detection of pests and potential pests. All pest control products will be consistent with CA Department of Pesticide Regulations approved list of approved active ingredients for pest control on cannabis (below) or expressly allowed for use on cannabis in California.

Insecticides and Miticides	
<ul style="list-style-type: none"> • Azadirachtin • <i>Bacillus thuringiensis</i> sub. <i>kurstaki</i> • <i>Bacillus thuringiensis</i> sub. <i>israelensis</i> • <i>Beauveria bassiana</i> • <i>Burkholderia</i> spp. strain A396 • Capsaicin • Cinnamon and cinnamon oil • Citric acid • Garlic and garlic oil • Geraniol • Horticultural oils (petroleum oil) • Insecticidal soaps (potassium salts of fatty acids) 	<ul style="list-style-type: none"> • Iron phosphate • <i>Isaria fumosorosea</i> • Neem oil • Potassium bicarbonate • Potassium sorbate • Rosemary oil • Sesame and sesame oil • Sodium bicarbonate • Soybean oil • Sulfur • Thyme oil
Fungicides and Antimicrobials	
<ul style="list-style-type: none"> • <i>Bacillus amyloliquefaciens</i> strain D747 • Cloves and clove oil • Corn oil • Cottonseed oil • <i>Gliocladium virens</i> • Neem oil • Peppermint and peppermint oil • Potassium bicarbonate • Potassium silicate 	<ul style="list-style-type: none"> • Rosemary and rosemary oil • Sodium bicarbonate • <i>Reynoutria sachalinensis</i> extract • <i>Trichoderma harzianum</i>

5 WATER USE

5.1 Water Source

Domestic water for the Project parcel, APN 524-112-002, is sourced from PODs on two adjacent headwater springs (Appendix B) that join to form an unnamed Class II stream. The POD seepage springs flow at a combined rate of ~2 to 10 gallons per minute (gpm) depending on the season (although monitoring would be required to determine more precise flow rates). An Initial Statement of Water Diversion and Use has been filed with the State Water Resources Control Board’s Division of Water Rights along with Form B5. These PODs are subject to signed 1600 LSA agreement with the California Department of Fish and Wildlife that requires dry season forbearance of irrigation water and some upgrades to the POD intake structures.

5.2 Water Storage and Plumbing

The PODs consists of small, concrete reinforced corrugated plastic culvert pipe sumps that collect water into 2 inch PVC pipes that are gravity fed into a settling tank equipped with a shut off float valve. A high pressure pump is then used to push water upslope to the places of use. The PODs are subject to dry-season forbearance (May 15th to October 15th) with irrigation water during this period provided by an off-channel rainwater catchment pond with capacity of ~675,000 gallons (Appendix B). Additional water storage is provide by a bank of water tanks totaling 11,500 gallons. More water storage or a well may be added in the future. The location of the PODs, pond, and places of use are shown on the topographic parcel site plan (Figure 2) and project topographic map (Figure 3).

5.3 Water Use

Domestic water is supplied by the PODs as needed with consumptive domestic use estimated at 200 to 400 gallons per day during the cultivation season with little or no use during the winter. Total estimated domestic water consumption is approximately ~60,000 gallons per year. Total estimated agricultural irrigation water use is approximately ~546,000 gallons (1.68 acre feet) for the growing season, although this is highly contingent on annual and monthly variation in meteorological conditions, cannabis strains, and cultivation techniques. The applicant irrigates at an agronomic rate that does not produce runoff.

6 OTHER PERMITS

The applicant has also applied for or obtained the following relevant permits:

- Humboldt County Commercial Cannabis Cultivation Permit
- Humboldt County Grading Permit
- CDFW 1600 Permit for POD
- CA State Commercial Cannabis Cultivation Permit.

7 MONITORING AND REPORTING

The private road system, cultivation flats, and the dry gulch shall be inspected annually by the landowner/cultivator or their qualified representatives, including photo documentation, to ensure conformation with standard conditions and minimize any risk of delivery of sediments or containments to receiving waters. Site inspections will be conducted at least two times annually:

- 1) The first annual inspection will occur prior to the onset of the wet season on approximately Oct 1st and by no later than Oct 15th to evaluate preparedness for the wet season and potential stormwater runoff and conduct routine maintenance as needed;
- 2) Prior to Dec 15th to ensure sites are functioning as anticipated under wet season conditions and also in time to conduct any additional maintenance prior to the height of the wet season if needed and in time to prepare the annual monitoring reporting at the end of the calendar year;
- 3) Annual monitoring inspections will also occur after any rainfall event with an intensity of 3 inches of precipitation within 24 hours. Precipitation data can be obtained from the National Weather Service by entering the site zip code at <http://www.srh.noaa.gov/forecast>.

In addition to these annual monitoring inspections, photo documentation and inspections of any sites permitted for upgrades or improvements (during the dry season) will be conducted before and after such work. This includes the drainage improvements proposed herein with construction anticipated during the dry season of 2018 with completion prior to Oct 15th 2018. During construction inspections, a checklist will be used to confirm confirmation of improvements and efficacy of management measures, and document the timing of progress on any plan elements subject to a time schedule.

An annual report (Appendix C of Order No. R1-2015-0023) will be submitted by Mar 31st of each year that documents monitoring inspection results based on the schedule above, and the implementation and effectiveness of any new management measures or improvements during the previous year. This monitoring report will provide the basis for completion of the annual re-certification process.

Appendix A – Road Improvements Summary Table

Personnel: **CRH**

Date: **September, 2015**

Log of Road Upgrade Treatments for the Spring Road, Humboldt County APN # 524-112-002					
Station	Site #	Road Tmt ¹	Comments/Treatment	Rock Needs	CMP Needs
¹ SOS = Start of Survey; DRC = Install ditch relief culvert; OSR-FD# = Outslope road by pulling berm and filling ditch; ISR # = Inslope road; RR = Road rock; AR = riprap/rock armor; EOS = End of Survey.					
0	-	-	SOS - Begin road log at the intersection of the Spring Road with the Maclay Driveway Road. Road station is approximate and was not measured in the field.	-	-
100	-	RD#18	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
225	-	RD#17	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
375	-	RD#16	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
465	-	RD#15	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
600	-	RD#14	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
720	1	-	A swale upslope has no defined channel. Concentrated road runoff and runoff from the swale have eroded a small gully in the outboard fill. Sediment delivery from this erosion is unlikely, as there is no defined channel downslope. 1) Install an armored fill at this location to prevent erosion of the road fill. Define the armored fill dip to constrain flow. Excavate a keyway, approximately 15 ft wide at the top, 6 ft wide at the base, 2 ft deep, and 18 ft long. Armor keyway with approximately 15 yd ³ of 1 ft diameter riprap.	15 yd ³ AR	-
875	-	-	Intersection of the Spring Road with an unnamed logging road. Drainage divide.	-	-
1,065	-	RD#13	1) Construct a Type III rolling dip, approximately 60 ft in length and 10% outslope, connected to the cutbank.	-	-
1,185	-	RD#12	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
1,210	2	-	End of Spring Road. The disturbed road surface at the end of the road is less than 40 ft from a nearby watercourse. Surface erosion from the graded road has the potential to deliver to the watercourse. 1) Spread approximately 10 lb of erosion control seed (barley or wheat based - no annual or perennial ryegrass) on the 60 ft x 25 ft disturbed area at the road terminus. Mulch the seeded area with rice straw until no bare soil can be seen through the straw.	-	-
1,210	-	-	EOS	-	-

Personnel: CRH

Date: September, 2015

Log of Road Upgrade Treatments for the Maclay Driveway, Humboldt County APN # 524-112-002					
Station	Site #	Road Tmt ¹	Comments/Treatment	Rock Needs	CMP Needs
¹ SOS = Start of Survey; DRC = Install ditch relief culvert; OSR-FD# = Outslope road by pulling berm and filling ditch; ISR #- Inslope road; RR = Road rock; EOS = End of Survey.					
0	-	-	SOS - Begin road log at the upper gate on the Maclay Driveway Road.	-	-
76	-	-	Center of landing location.	-	-
200	-	RD #1	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
360	-	RD #2	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
395	-	Start ISR #1 Begin Rock Road	1) Begin insloping the road to collect road surface runoff to the pond downslope. 2) Begin rocking the inboard ditch with 6" and smaller rock 3) Begin rocking the road surface, 12 ft wide.	25 yd ³ RR	-
560	-	End ISR #1 End Rock Road RD #3	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%. 2) End insloping the road at the Rolling Dip #3. 3) End road rocking at the crest of Rolling Dip #3.	-	-
713	-	RD #4 Begin OSR-FD #1	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%. 2) Begin outsloping the road by removing the outboard berm, placing excavated material on the inboard edge of the road, and grading the road surface to be 6-8% outsloped.	-	-
877	-	RD #5	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
1,128	-	RD #6	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
1,209	-	RD #7	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
1,438	-	RD #8	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
1,570	-	RD #9	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
1,725	-	RD #10	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-
1,882	-	RD #11	1) Construct a Type I rolling dip, connected to the cutbank, outslope the trough of the dip at 10%.	-	-

Log of Road Upgrade Treatments for the Maclay Driveway, Humboldt County APN # 524-112-002					
Station	Site #	Road Tmt ¹	Comments/Treatment	Rock Needs	CMP Needs
2,000	-	-	Intersection of Maclay Driveway and Spring Road at metal shed.	-	-
2,117	-	RD #19	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
2,285	-	RD #20	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
2,380	-	RD #21	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
2,531	-	RD #21.1	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
2,643	-	RD #22	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
2,817	-	-	Road intersection at the lower cabin.	-	-
2,910	-	RD #23	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
3,052	-	RD #24	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
3,200	-	RD #25	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
3,387	-	RD #26	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
3,895	-	-	Gate at swale location.	-	-
3,946	-	RD #27	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
4,036	-	RD #28	1) Construct a Type III rolling dip, approximately 60 ft in length and 10% upslope, connected to the cutbank.	-	-
4,152	-	RD #29	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
4,330	-	RD #30	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
4,573	-	RD #31	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
4,687	-	RD #32	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-
4,789	-	RD #33	1) Construct a Type I rolling dip, connected to the cutbank, upslope the trough of the dip at 10%.	-	-

Log of Road Upgrade Treatments for the Maclay Driveway, Humboldt County APN # 524-112-002					
Station	Site #	Road Tmt ¹	Comments/Treatment	Rock Needs	CMP Needs
5,030	-	End OSR- FD #1	Gate at property line. 1) End outsloping the road surface and removing the outboard berm at the gate.	-	-
5030	-	-	EOS	-	-

Appendix B - Photos



Photos 1 and 2. The PODs for APN 524-112-002 located on two, closely adjacent springs (~100 ft apart) that form the headwaters of minor Class II stream channel that is an unnamed tributary to the lower South Fork Trinity River.



Photo 3. Off-channel, rainwater catchment pond that provides irrigation water for APN 524-112-002 during the forbearance season. This will be retrofitted with semi-floating dock for to allow any animals to exit the lined-pond.



Photo 3. Diesel generator with shed and containment.



Photo 4. Greenhouses for mixed-light cultivation in Area 2.