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Cleanup, Restoration, and Monitoring Plan

In response to

Cleanup and Abatement and 13267 Order No. R1-2021-0003

for

Tina Lyn, California Property Solutions LLC, Young Jacobsen, Diane Sodosky and Patient 2 Patient Inc.

Humboldt County Assessor's Parcel Number (APN) 214-142-012-000, formerly APNs 214-142-008-000, 214-142-009-000 and 214-142-011-000 (the Property)

WDID - 1_12CC416381

Humboldt County
APN: 214-142-012-000

Prepared by:

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Revised by Omsberg & Preston: 5/15/2023

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Purpose

This Cleanup, Restoration, and Monitoring Plan (CRMP) has been prepared on behalf of the cannabis cultivator for the Humboldt County property identified as Assessor Parcel Numbers 214-142-012-000, by agreement and in response to the State Water Resources Control Board Cleanup and Abatement Order No. R1-2021-0003 for Tina Lyn, California Property Solutions LLC, Young Jacobsen, Diane Sodosky, and Patient 2 Patient Inc. This Order requires the Dischargers to clean up and abate the effects of unauthorized fill of watercourses and wetlands. Investigation and cleanup actions required under this Order shall be conducted to comply with the Porter-Cologne Water Quality Control Act (Wat. Code § 13000 et seq.), the Water Quality Control Plan for the North Coast Region (Basin Plan), State Water Resources Control Board (State Water Board) Resolution 92-49, Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code Section 13304 (Resolution 92-49), and other applicable State and Regional Water Board plans, policies, and regulations.

Stated Findings of Cleanup and Abatement Order No. R1-2021-0003

The Executive Officer finds, with respect to the Dischargers' acts, or failure to act, the following:

1. **Site Conditions:** The South Fork Eel River, its unnamed tributaries, and adjoining wetlands are waters of the state, as well as waters of the United States (references hereafter to waters of the United States are also waters of the state). The Dischargers have culverted a length of watercourse greater than 100 feet and graded several areas upon which to construct greenhouses for cannabis cultivation. Grading/site development resulted in fill and impact of at least 0.94 acres of wetlands on the Property and 700 linear feet of streambed. Regional Water Board staff described and documented these impacts in a report of an August 21, 2018 inspection (2018 Inspection Report), and an August 7, 2020 inspection (2020 Inspection Report). The Dischargers' activities resulting in the dredge and fill in watercourses and wetlands were conducted without authorization from applicable federal, state, and local agencies, including the Regional Water Board.

2. **Cleanup and Abatement Action Necessary:** Cleanup and abatement is necessary to ensure that the existing condition of pollution is cleaned up, that the threat of unauthorized discharges to waters of the state from the Property are prevented, background water quality conditions are restored, and that any impacts to beneficial uses are mitigated. The current condition of pollution is a priority violation and the issuance of a cleanup and abatement order pursuant to Water Code section 13304 is appropriate and consistent with the policies of the Regional Water Board.

Impact Assessment

Below is listed the impacts that the Dischargers unpermitted impacts have caused.

1. Earthen material associated with constructing greenhouses in watercourses and wetlands by or directed by the Dischargers has discharged and still has the potential to discharge, sediment,

and other waste into watercourses and associated wetlands that are tributary to the South Fork Eel River in violation of Water Code sections 13260 and 13376 and provisions of the Basin Plan and creates or threatens to create a condition of pollution.

2. Discharges of sediment and other inert material alter the hydrologic and sediment transport regimes of surface waters. Such changes may lead to adverse conditions such as flooding, increases in suspended sediment and turbidity, accelerated erosion of the watercourse bed or banks, and localized accumulation of deleterious materials. Additionally, such discharges directly threaten wildlife habitat and aquatic species (Beneficial Uses impacted: RARE, MIGR, SPWN, COLD, COMM, and WILD). Increased sedimentation and turbidity can result in increased treatment and/or maintenance costs for downstream agricultural and municipal users that withdraw and treat the water (Beneficial Uses impacted: AGR and MUN). Sediment-laden stormwater discharges to surface water and the resulting turbidity can also affect the recreational and aesthetic enjoyment of the surface waters (Beneficial Uses impacted: REC-1 and REC-2).

3. The discharge of earthen material in the South Fork Eel River watershed is especially problematic because, as noted above, the South Fork Eel River watershed is listed as an impaired waterbody under Section 303(d) of the Clean Water Act due to several pollutants, including sedimentation/siltation. Sediment delivery impacts the migration, spawning, reproduction, and early development of cold-water fish such as spring and fall-run Chinook salmon, Coho salmon, and steelhead trout (Beneficial Uses impacted: SPWN and MIGR).

4. Suspended sediment in surface waters can cause harm to aquatic organisms by abrasion of surface membranes, interference with respiration, and sensory perception in aquatic fauna. Suspended sediment can reduce the photosynthesis and survival of aquatic life by limiting the transmittance of light. The Basin Plan contains a water quality objective for sediment, which requires that the suspended sediment load and suspended sediment discharge rate of surface waters shall not be altered in such a manner as to cause nuisance or adversely affect beneficial uses. As stated above, sediment is a pollutant that can have substantial biological, chemical, and physical effects on receiving waters.

   These include (1) increased turbidity (loss of clarity) and resulting in decreased light transmittance, biological productivity, and aesthetic value; and (2) physical suffocation through burial of bottom-dwelling (benthic) organisms, and salmonid eggs, and alevin (newly spawned salmon or trout still carrying its yolk). Sediment can also physically damage gills causing fish mortality; increased physiological stress; reduce reproduction; impair normal feeding and predator avoidance behaviors, resulting in impacts to commercial and recreational fishing resources; increase water temperature, and fill in lagoons and wetlands converting them from aquatic to terrestrial habitat.

   It should be noted that these water quality impacts occur both during sediment transport and sediment deposition. In addition to the problems associated with suspended sediment, sediment is also an excellent transport mechanism for toxics (e.g., metals and synthetic organics), which

bind to sediment particles (Beneficial Uses impacted: REC-1, REC-2, COLD, SPWN, RARE, MIGR, COMM, MUN, and WILD).

5. Wetlands act as primary producers, help retain floods, recharge and discharge groundwater, act as water quality filters, provide recreational and scenic values, and harbor a significant number of California's threatened and endangered plant and animal species. Filling and disturbing a combined 0.94 acres of wetlands has directly threatened wetland habitat, wildlife habitat, and aquatic species.

Scope of Report

Multiple assessments, by Timberland Resource Consultants (TRC), Kyle Wear, Trinity Valley Consulting Engineers (TVCE), Omsberg & Preston (O&P), the North Coast Regional Water Quality Control Board (NCRWQCB), the California Department of Fish and Wildlife (CDFW), and the United States Army Corps of Engineers (USACE) have been completed of any direct and indirect impacts to any waters of the state on the Property, including, but not limited to, rivers, streams, seeps, springs, bogs, and wetlands, caused by the unauthorized activities, including all areas that have been developed or disturbed; and identify controllable sediment sources requiring restoration. These assessments address surface water hydrology, bed and bank stability, riparian and aquatic habitat and loss thereof, channel slope stability, encroaching reservoirs, active or potential erosion and sedimentation sites, stability of graded and disturbed features, culverts, and other stream crossings, as well as roads and all disturbed areas on the Property. As part of these assessments, the impoundments identified as WQ-4 and WQ-5, as well as impoundments at WQ-8 and WQ-9, in Water Quality Report of August 7, 2020 Inspection, have been assessed for the threat of failure and applicable implementable measures to prevent controllable sources of sediment from the impoundments by TRC and TVCE. These assessments include aerial photographs and/or satellite images, photographs, wetland delineation reports, topographic maps, and drawings of Property conditions before and after conducting the unauthorized activities and include a detailed map of features accurately depicting the Property's topography, all graded surfaces, all waters of the state and waters of the United States, drainages, and stream crossings, instream structures, and the functional status of these features. Assessment findings before and after the unauthorized activities serve as the basis for the CRMP. See the attached SMP, LSAA w/ Amendment (submitted), ARD, Waterboard Documents, USACE 404 Application, and GECP to review these assessments.

A proposal to restore beneficial uses of any waters of the state on the Property that were adversely impacted by the unauthorized activities, including the South Fork Eel River, and its unnamed tributaries, and any springs, seeps, bogs or wetlands (e.g. complete removal of the greenhouses, roads and earthen fill placed within wetlands and full restoration of the wetlands) has been prepared by TRC, TVCE, O&P, and Samara Restoration (SMR). See the section titled "Cleanup and Restoration Proposal" below and the attached GECP, RPP, SWRCB 401 WQC application, and the USACE 404 permit application.

A proposal to provide onsite compensatory mitigation to compensate for any temporal and/or permanent impacts to wetlands and other waters of the state that resulted from unauthorized

activities on the Property has been prepared by TRC, TVCE, and Samara Restoration (SMR). A proposal to satisfy remaining compensatory mitigation requirements is in development by O&P and will occur off-site as onsite options have been exhausted. With the expressed support of NCRWQCB Staff, the mitigation sites will be located in nearby watersheds if options for the South Fork Eel River cannot be discovered and will be submitted upon completion. The compensatory mitigation complies with the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (State Wetland Definition and Procedures) and was/is being developed in accordance with the US Army Corps of Engineers Regulatory Program Standard Operating Procedure for Determination of Mitigation Ratios (12501-SPD). This proposal has been prepared to (1) describe existing site conditions at the proposed mitigation sites; (2) describe implementation methods used to provide compensatory mitigation; and (3) includes and will include photo point monitoring that will document the success of the compensatory mitigation that is submitted in a monthly progress report due on the 1st of each month until all required construction activities are completed. See the section titled “Cleanup and Restoration Proposal” below and the attached GECP, RPP, SWRCB 401 WQC application, and the USACE 404 permit application.

An implementation schedule that includes a schedule for submitting permit applications to all applicable local, state, and federal agencies, detailed project milestones to fulfill the requirements of this Order once those permits are obtained, and a deadline for having fully implemented and completed the CRMP can be found below. See the table labeled “Timeline of Related Events, Permitting, and Work Implementation Schedule”.

Methods

The methods used to develop this CRMP include both field and office components. The office component consisted of aerial photography review and interpretation, existing USGS quad map review, GIS mapping of field data, review of on-site photography points, streamflow calculations, general planning, and information gathered from the cannabis cultivator and/or landowner. The field component included mapping of all access roads, vehicle parking areas, Waters of the State, stream crossings, drainage features, cultivation sites, buildings, disturbed areas, and all other relevant site features within the project area and surrounding areas (as feasible). Cultivation areas, associated facilities, roads, and other developed and/or disturbed areas were assessed for discharges and related controllable water quality factors from the activities listed in the General Order.

Property Description

The property consists of one contiguous parcel totaling 380 acres located approximately 3.5 miles south of Phillipsville, California, at an elevation of approximately 600 feet above mean sea level. The property is located in Section 25, T3SN, R3E, HB&M, Humboldt County, from the Miranda USGS 7.5’ Quadrangle. Unnamed Class II and III watercourses flow east through the property and drain to South Fork Eel River, which runs along the eastern property boundary.

Project Description

Cannabis cultivation on the property consists of approximately 81,930 ft^2 of outdoor cannabis cultivation. The cultivation areas are/were located within approximately 291,441 ft^2 of disturbed

area, which are located in seven separate areas on the property. The project is operated year-round. All water used on the property is sourced from a groundwater well. This project is being permitted by Humboldt County (Application No. PLN-12416-CUP & #12426) to cultivate cannabis. This project was previously enrolled in the North Coast Regional Water Quality Control Board Order No. R1-2015-0023 under WDID-1B161040CHUM and has since enrolled with State Water Resources Control Board as WDID-1_12CC416381. This project is being classified as Tier 2, High Risk until the issues at WQ-1 and WQ-2 are fully addressed.

Table 1: Cultivation Site Parameters.

Cultivation Area	Land Disturbance Area (ft^2)	General Cultivation Area[1] (ft^2)	Adjoining Hillslopes (% Grade)
A	48,660	28,800	18
B	38,830	29,090(removed)	10
C	44,570	24,040(removed)	18
D	84,375	-	10
E	45,440	-	18
F	16,309	-	10
G	13,257	-	8
Totals:	291,441	81,930	

[1] Area refers to the total land disturbance area. The total cannabis canopy area may vary considerably from the disturbance area.

Table 2: Project Permitting

Additional Required Permits Related to Project, Type, and Status	
LSAA/1600	Submitted 06/25/2020, Revisions submitted 01/29/2021 & 02/24/2021, 05/16/2023 Lake and Streambed Alteration Agreement from CDFW – Notification No. 1600-2015-0139-R1 & 1600-2020-0303-R1
IS/SIUR	Initial Statement of Water Diversion and Use Filed – #027896, 027897, 027898 Small Irrigation and Use Registration Filed – H512864, H512867
401 WQC	Submitted 04/01/2021, revised 05/15/2023, submitted 05/16/2023
404 CWA permit	Submitted 04/01/2021, USACE File ID SPN-2021-00127, resubmitted 05/16/2023
GECP	Attached, submitted 04/01/2021, revised 05/15/2023, submitted 05/16/2023
RPP	Attached, submitted 04/01/2021, revised 05/15/2023, submitted 05/16/2023
County	Application No. PLN-12416-CUP & #12426
CDFA	CLL 18-0003187, CLL 18-0003189, CLL 18-0003190

Cleanup and Restoration Proposal

The proposal to restore beneficial uses of any waters of the state on the Property that were adversely impacted by unauthorized and legacy activities are concisely summarized and listed below in general stages of work. Specifications of all proposed CRMP work, as well as other similar work such as SMP/LSAA prescriptions that are not addressed in the CRMP, can be found

within the attached documents under the Attachments section of this document. See the SMP, LSAA, GECP, RPP, SWRCB 401 WQC application, and the USACE 404 permit application. Specific prescription page references can be found with each WQ proposal below.

Wetlands & Watercourses impacted:

WQ-1 & 2

1st stage: Pull back fill and fillslopes placed into wetlands and contour the fill into source cut hillslopes to recreate pre-development, historic, topography.
(GECP Plan Site 10/WQ-1 & 2 Drawing No. C05.7 – 6.2 and SWRCB 401 WQC Addendum pages 2 - 3)

2nd stage: Begin grading and contouring wetland areas.
(GECP Plan Site 10/WQ-1 & 2 Drawing No. C05.7 – 6.2 and SWRCB 401 WQC Addendum pages 2 - 3)

3rd stage: Implement erosion control measures and begin planting.
(GECP Plan Site 10/WQ-1 & 2 Drawing No. C08.2, RPP pages 1 – 4, and attached BMPs pages 2 – 10)

WQ-3 & 7

1st stage: Remove existing drainage structures (first 40' from inlet at WQ-3).
(GECP Plan Site 4/WQ-3 & 4 Drawing No. C03.8 – 4.1, GECP Plan Site 9/WQ-7 Drawing No. C05.4 – 5.6, and SWRCB 401 WQC Addendum pages 1 - 2)

2nd stage: Upgrade/modify existing watercourse crossings and install new drainage structures.
(GECP Plan Site 4/WQ-3 & 4 Drawing No. C03.8 – 4.1, GECP Plan Site 9/WQ-7 Drawing No. C05.4 – 5.6, and SWRCB 401 WQC Addendum pages 1 - 2)

3rd stage: Implement erosion control measures.
(GECP Plan Site 4/WQ-3 & 4 Drawing No. C07.5, GECP Plan Site 9/WQ-7 Drawing No. C08.1, and attached BMPs pages 2 – 10)

WQ-3 (50' SMA Setback Restoration)

1st stage: Remove portion of greenhouse within setback.

(GECP Plan WQ-3 & 4 Drawing No. C03.8 – 4.1, SWRCG 401 WQC Addendum page 1)

2nd stage: Rip road surface and graded area within setback.

(GECP Plan WQ-3 & 4 Drawing No. C03.8 – 4.1, SWRCG 401 WQC Addendum page 1)

3rd stage: Implement erosion control measures and begin planting.

(GECP Plan WQ-3 & 4 Drawing No. C07.5, RPP pages 1 – 4, and attached BMPs pages 2 – 10.)

WQ-6

1st stage: Remove existing drainage structure.
(GECP Plan Site 8/WQ-6 Drawing No. C05.1 – 5.3 and SWRCB 401 WQC Addendum page 2)

2nd stage: Remove placed crossing fill and layback fillslopes/streambanks.
(GECP Plan Site 8/WQ-6 Drawing No. C05.1 – 5.3 and SWRCB 401 WQC Addendum page 2)

3rd stage: Implement erosion control measures.
(GECP Plan Site 8/WQ-6 Drawing No. C07.9 and attached BMPs pages 2 – 10)

WQ-4 & 5

1st stage: Drain pond, if needed, and begin excavation of impoundment fill prism.
(GECP Plan Site 4/WQ-3 & 4 Drawing No. C03.8 – 4.1, GECP Plan Site 7/WQ-5 Drawing No. C04.7 – 4.9, and SWRCB 401 WQC Addendum pages 1 – 2 & 5)

2nd stage: Place and key-in ¼-ton RSP along the excavated impoundment's downhill fillslope.
(GECP Plan Site 4/WQ-3 & 4 Drawing No. C03.8 – 4.1, GECP Plan Site 7/WQ-5 Drawing No. C04.7 – 4.9, and SWRCB 401 WQC Addendum pages 1 – 2 & 5)

3rd stage: Install the impoundment toe drainage ditch at the base of the ¼-ton RSP downhill armored fillslope (WQ-5 only).
(GECP Plan Site 7/WQ-5 Drawing No. C04.7 – 4.9, and SWRCB 401 WQC Addendum pages 1 – 2 & 5)

4th stage: Install rock armored spillway over both impoundment fill prisms.
(GECP Plan Site 4/WQ-3 & 4 Drawing No. C03.8– 4.1, GECP Plan Site 7/WQ-5 Drawing No. C04.7 – 4.9, and SWRCB 401 WQC Addendum pages 1 – 2 & 5)

5th stage: Implement erosion control measures.
(GECP Plan Site 4/WQ-3 & 4 Drawing No. C07.5, GECP Plan Site 7/WQ-5 Drawing No. C07.8, and attached BMPs pages 2 – 10)

WQ-9

Maintenance impoundment overflow structure.

1st stage: Clear overflow drainage structure inlet and install inlet debris catchment structure around the inlet.
(GECP Plan Site 2/WQ-9 Drawing No. CO3.3 & 3.4 and SWRCB 401 WQC Addendum page 5)

2nd stage: Install rock armoring at the outlet of the overflow drainage structure.
(GECP Plan Site 2/WQ-9 Drawing No. CO3.3 & 3.4 and SWRCB 401 WQC Addendum page 5)

3rd stage: Implement erosion control measures.

(GECP Plan Site 2/WQ-9 Drawing No. C07.3, and attached BMPs pages 2 – 10)

Site D (as referenced in the March 2022 Aquatic Resources Impact Assessment)

1st stage: Pull back fill and fillslopes placed into wetlands and contour the fill into the adjacent graded area that is to remain.
(GECP Plan Site 11/D Drawing No. C06.3 – 6.5 and SWRCB 401 WQC Addendum page 5)

2nd stage: Grade and contour the impact wetland area back to pre-project conditions as close as feasibly possible.
(GECP Plan Site 11/D Drawing No. C06.3 – 6.5 and SWRCB 401 WQC Addendum page 5)

3rd stage: Implement erosion control measures and begin planting the wetland area using the planting pallet outlined in the RPP.
(GECP Plan Site 11/D Drawing No. C08.3, RPP pages 1 – 4, and attached BMPs pages 2 – 10)

Site E (as referenced in the March 2022 Aquatic Resources Impact Assessment)

1st stage: Pull back fill and fillslopes placed into the watercourse and contour the fill into source cut hillslopes of the graded area that is to remain to recreate pre-development, historic, topography of the watercourse's streambed and banks.
(GECP Plan Site 12/E Drawing No. C06.6 – 6.10 and SWRCB 401 WQC Addendum page 5)

2nd stage: Implement erosion control measures.
(GECP Plan Site 12/E Drawing No. C08.4 and SWRCB 401 WQC Addendum page 5)

Site G (as referenced in the March 2022 Aquatic Resources Impact Assessment)

1st stage: Pull back fill and fillslopes placed into the watercourse/wetland area and contour the fill into source cut hillslopes of the graded area to recreate pre-development, historic, topography of the wetland and the watercourse's streambed and banks.
(GECP Plan Site 6/G Drawing No. C04.4 – 4.6 and SWRCB 401 WQC Addendum page 6)

2nd stage: Grade and contour the impacted wetland area back to pre-project conditions as close as feasibly possible.
(GECP Plan Site 6/G Drawing No. C04.4 – 4.6 and SWRCB 401 WQC Addendum page 6)

3rd stage: Implement erosion control measures and begin planting the wetland area using the planting pallet outlined in the RPP. (GECP Plan Site 6/G Drawing No. C07.7, RPP pages 1 – 4, and attached BMPs pages 2 – 10)

Timberland Resource Consultants

Timeline of Related Events, Permitting, and Work Implementation Schedule

April, 2015	
Related Events	Submit first LSAA to CDFW (April 23rd)
	Submit first water right claim (Registration for Small Domestic Use Appropriation, rejected, not applicable for commercial use) (April 23rd)
July, 2016	
Related Events	Enrolled property into the NCRWQCB's Order R1-2015-0023 under a Tier 2 status (July 21st)
June, 2017	
Related Events	Submit second water right claim (Initial Statement of Water Diversion and Use) (June 17th)
March, 2018	
Related Events	Submit third water right claim (Cannabis Small Irrigation Use Registration, rejected, not yet available) (April 23rd)
August, 2018	
Related Events	NCRWQCB and other agencies inspect the project property (August 21st)
September, 2018	
Related Events	Receive August 21, 2018 Inspection Report from NCRWQCB (September 18)
May, 2019	
Related Events	Submit fourth water right claim (Cannabis Small Irrigation Use Registration) (Notice of Receipt for no requirement of a SIUR) (May 24th)
	Transferred enrollment from the Regional Cannabis Order to the Statewide Cannabis General Order under a Tier 2, Low Risk status (May 24th)
November, 2019	
Related Events	Submit Aquatic Resources Report to the NCRWCB (November 15th)
April, 2020	
Related Events	Receive Notice of Violation from NCRWQCB. (April 13th)
	Upgrade property's status from Tier 1, Low Risk to Tier 2, High Risk. (April 15th)
June, 2020	
Permits & Plans:	Submit second LSAA to CDFW. (June 25th)
August, 2020	
Permits & Plans:	Submit SMP & DASP to the NCRWQCB. (August 6th)
	NCRWQCB and other agencies inspect the project property. (August 7th)
	Receive August 7th, 2020 Inspection Report from NCRWQCB. (August 28th)
December, 2020	
Permits & Plans:	Receive CAO/CRMP Draft from NCRWQCB. (December 1st)
	Submit CRMP Request Draft Changes to NCRWQCB. (December 15th)

January, 2021	
Permits & Plans:	Submit LSAA revisions to CDFW. (January 29th)
February, 2021	
Permits & Plans:	Receive finalized CAO/CRMP from NCRWQCB. (February 9th)
	Submit LSAA revisions to CDFW. (February 24th)
March, 2021	
Permits Plans:	Begin development of CRMP, GECP, RPP, SWRCB 401 WQC, and USACE 404 Permit.
April, 2021	
Permits Plans:	Receive USCOE 404 permit
	Revisions to GECP, CRMP, and SWRCB 401 WQC
May, 2021	
Permits Plans:	Revisions to GECP, CRMP, and SWRCB 401 WQC
June, 2021	
Permits Plans:	Revisions to GECP, CRMP, and SWRCB 401 WQC
July, 2021	
Permits Plans:	Receive CDFW LSAA, request revisions
	Revisions to GECP, CRMP, and SWRCB 401 WQC
	Conduct assessment of culvert alignment at WQ-3, as requested by NCRWQCB staff
August/September, 2021	
Permits Plans:	Revisions to GECP, CRMP, and SWRCB 401 WQC
	Discussions with Waterboard staff regarding CRMP revisions and compensatory mitigation proposals.
	Conduct preliminary assessment of the project property for potentially feasible locations for compensatory mitigation wetland creation.
October, 2021	
Permits Plans:	Receive Notice of Violation, Cleanup and Abatement Order No. R1-2021-0003, Directive No. 1 for California Property Solutions, LLC from the NCRWQCB
	Begin scoping for comprehensive impact assessment and wintertime monitoring, as requested by NCRWQCB Directives.
November, 2021	
Permits Plans:	Finalize CDFW LSAA permit
	Revisions to CRMP and SWRCB 401 WQC that address concerns in the NOV-COA Directives
	Begin drafting response to NOV-COA Directives
January, 2022	
Permits Plans:	First wintertime monitoring visit with Kyle Wear.
Febuary, 2022	
Permits Plans:	Second wintertime monitoring visit with Kyle Wear. Begin drafting of comprehensive impact assessment (Aquatic Impact Assessment).
March, 2022	
Permits Plans:	Complete comprehensive impact assessment (Aquitic Impact Assessment).
	Begin revisions to CRMP, SWRCB 401 WQC, USCOE 404, GECP, and CDFW LSAA
	Submit Response Letter to CAO and NOV-COA Directives

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Timeline of Related Events, Permitting, and Work Implementation Schedule

May 2023:

- Continue revisions to CRMP, SWRCB 401 WQC, & GECP. Submit when revisions to GECP are completed with detail of Sites D, E, & G.

June 2023:

- Begin WQ-1 & 2 groundbreaking and earthwork per attached relevant documents.
- Begin WQ-6 & 7 groundbreaking and earthwork per attached relevant documents.
- Submit Monthly Progress Report beginning July 1st.

July 2023:

- Begin WQ-3 & 4 groundbreaking and earthwork per attached relevant documents.
- Begin WQ-5 groundbreaking and earthwork per attached relevant documents.
- Begin maintenance of impoundment overflow at WQ-9.
- Submit Monthly Progress Report by August 1st.

August 2023:

- Begin Sites D & G groundbreaking and earthwork per attached relevant documents.
- Submit Monthly Progress Report by September 1st.

September 2023:

- Begin Site E groundbreaking and earthwork per attached relevant documents.
- Submit Monthly Progress report by October 1st.

October 2023:

- All erosion control measures at all sites will be implemented by October 15th.
- Planting of the wetland areas may begin pending precipitation events and soil moisture levels.
- Submit Monthly Progress report by November 1st.

November 2023:

- Planting of the wetland areas may begin pending precipitation events and soil moisture levels.
- Submit CRMP, LSAA, 401 & 404 Completion Reports, if planting is complete.

December 2023:

- Planting of the wetland areas will be completed by the end of December, if not yet completed.
- Submit CRMP, LSAA, 401 & 404 Completion Reports by deadline if they have not yet been submitted.

January 2024:

- Submit Annual Monitoring Report.

January 2025:

- Submit Annual Monitoring Report.

January 2026:

- Submit Annual Monitoring Report.

January 2027:

- Submit Annual Monitoring Report.

January 2028:

- Submit Annual Monitoring Report.

January 2029:

- Submit Annual Monitoring Report.

Monitoring and Reporting

Monthly Progress Reports

Monthly Progress Reports beginning the first day of the month following the implementation start date of the CRMP, through completion of cleanup, stabilization, restoration, and mitigation work will be submitted. These monthly Progress Reports will include:

- photographs at each photo monitoring point, as depicted on site maps/figures.

Completion Report

No more than 60 days after fully completing the CRMP, a Completion Report for the CRMP will be submitted for approval by the Regional Water Board or its delegated officer. The Completion Report will include:

- accurate depictions
- documentation
- as-built designs of all completed restoration construction and/or abatement measures included in the approved CRMP to restore unnamed tributaries to the South Fork Eel River, and their adjoining wetlands to demonstrate the CRMP has been fully implemented
- pre- and post-construction photographs were taken at each photo point, as depicted on site maps/figures.

Annual Monitoring Reports

Upon completion of the restoration and mitigation of waters of the state, annual monitoring reports will be submitted by January 31 of each year for at least five years or until the Regional Water Board or its delegated officer approves a request to discontinue monitoring. This request will be submitted when the approved success criteria in the CRMP are met with supporting documentation.

Each annual monitoring report will include, at a minimum:

- a completed inspection checklist
- photos of areas restored
- a description of any locations where restoration is failing and/or needs to be corrected to achieve the success criteria

Photographs

Photo Dates: March 2nd, 2021, May 5th, 2020, aerial photos June 4th, 2020.

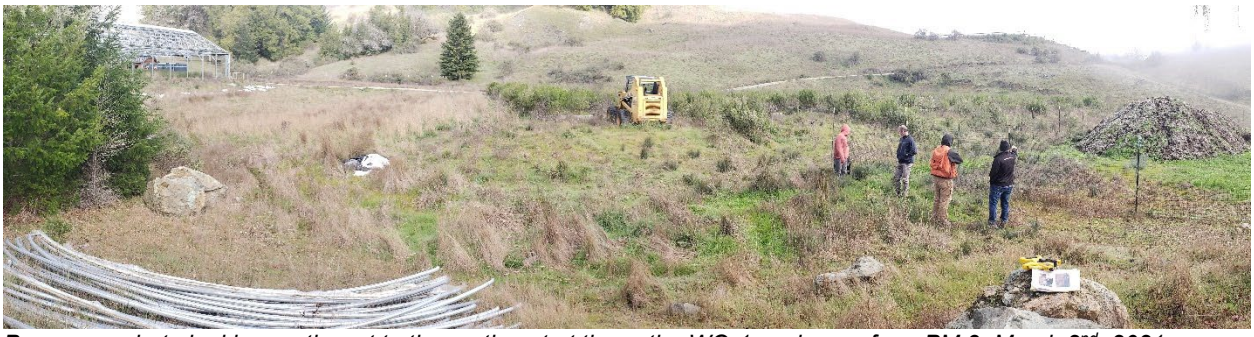
Photo looking southwest at WQ-1, as marked on attached site maps, and the primary wetland restoration area from Photo Monitoring Point 1 (PM 1). March 2nd, 2021

Photo looking south at WQ-1 from PM 1. March 2nd, 2021

Photo looking southeast at the easternmost edge of WQ-1 grading area from PM 1. March 2nd, 2021

Panorama photo looking southeast to southwest at WQ-1 from PM 1. March 2nd, 2021

Photo looking northwest towards WQ-1 from PM 3. March 2nd, 2021



Panorama photo looking northwest to the northeast at the entire WQ-1 work area from PM 3. March 2nd, 2021

Aerial photo looking down on WQ-1 & 2. June 4th, 2020

Aerial photo looking northwest at WQ-1 with WQ-2 in the upper left behind the greenhouse. June 4th, 2020

Aerial photo looking northwest at WQ-1 with WQ-2 in the upper left behind the greenhouse. June 4th, 2020

Aerial photo looking southwest at WQ-1 with WQ-2 in the middle-upper right behind the greenhouse. June 4th, 2020

Panorama photo looking southeast to southwest at WQ-2 from PM 2. March 2nd, 2021

Photo looking southwest at WQ-2 from PM 2. March 2nd, 2021

Photo looking southwest at WQ-2 from just down grade from PM 2. March 2nd, 2021

Photo looking northwest at WQ-2 from PM 4. March 2nd, 2021

Aerial photo looking down on WQ-2. June 4th, 2020

Aerial photo looking south at WQ-2. June 4th, 2020

Aerial photo looking southeast at WQ-2. June 4th, 2020

Aerial photo looking southeast at WQ-1 & WQ-2 with the pond at WQ-8 in the lower left. June 4th, 2020

Photo looking southeast at WQ-3 from just downslope from PM 6. May 5th, 2020

Photo looking south at WQ-4 from just downslope from PM 6. May 5th, 2020

Aerial photo looking down at WQ-3. June 4th, 2020

Photo looking north at WQ-4 from PM 8. March 2nd, 2021

Photo looking north at WQ-4 from PM 4. March 2nd, 2021

Aerial photo looking down at WQ-4. June 4th, 2020

Photo looking north at WQ-5 from PM 10. March 2nd, 2021

Photo looking southwest directly at the impoundment overflow structure outlet and downhill fillslope toe of the impoundment at WQ-5 from PM 11. March 2nd, 2021

Photo looking southwest toward the impoundment overflow structure outlet and downhill fillslope toe of the impoundment at WQ-5, which is behind the redwood trees to the right, from PM 11. March 2nd, 2021

Aerial photo looking down at WQ-5. June 4th, 2020

Aerial photo looking down at WQ-5. June 4th, 2020

Photo looking southwest at the inlet of the watercourse crossing at WQ-6 from PM 12.

Photo looking northwest at the outlet of the watercourse crossing at WQ-6 from PM 13.

Photo looking southeast at the inlet of the watercourse crossing at WQ-7 from PM 14.

Photo looking southwest at the outlet of the watercourse crossing outlet at WQ-7 from PM 15.

Aerial photo looking down at WQ-8. June 4th, 2020

Photo looking northwest at the inlet of the impoundment overflow structure inlet at WQ-9. March 2nd, 2021

Photo looking west at the impoundment overflow structure outlet at WQ-9. March 2nd, 2021

Aerial photo looking down at WQ-9. June 4th, 2020

Photo looking southeast at the impacted wetland at Site D.

Photo looking east at the impacted wetland at Site D.

Photo looking north at the impacted wetland at Site D.

Photo looking south at Site E. The impacted watercourse/streambed is located on the center right section of the graded area in the center of the photograph.

Looking up slope and north at the southeastern corner of the impacted watercourse/streambed. The unimpacted watercourse channel begins within the coyote brush located in the lower right hand corner of the photo.

Looking up slope and west at the unimpacted, watercourse. The man in the upper right hand corner is standing on the leading edge of the graded area with the filled in watercourse/streambed to his back.

Looking up slope at the southern edge of the graded area and the cutbank above the graded area. The streambed will be restored through this area from center right to lower left of the photo. In this photo, you can see the drainage ditch from the center of the photo going left to the center edge of the photo. This drainage ditch conveys flows that otherwise would have been flows in the native watercourse. During restoration activities this ditch will be breached with the restored watercourse to return flows. The channel that these diverted flows have created will be left alone.

Looking east at the southern edge of the graded area at Site E. This southern edge will be removed (fill pulled back and contoured into the graded area) and the watercourse restored that is underneath it.

Photo looking northeast at Site G. The impacted wetland area is center, along the edge of the road with the impacted watercourse starting at this wetland area moving straight back to the top center bush in the photo.

Photo looking southeast at Site G.

Photo looking northwest at Site G, opposite of the previous photo above.

Photo looking west at Site G. The restored streambed will be approximately in this location that connects to the restored wetlands at the base of the road located at the base of the trees to the left.

Photo of the beginning of the native watercourse channel. The extent the watercourse will be restored to pre-disturbance conditions.

Photo looking downstream from the previous photo at the beginning of the unimpacted watercourse.

Photo looking down slope at the unimpacted wetland complex to the center right to the center(where the man is standing) and of the impacted wetland and streambed area of Site G directly behind the man.

Attachments