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December 29, 2015

Matthias St. John, Executive Officer  
North Coast Water Quality Control Board  
5550 Skylane Blvd Ste. A  
Santa Rosa CA 95403

Dear Mr. St. John,

SUBJECT: ORDER NO.R1-2015-0023

Attached is a proposal for Timberland Resource Consultant's Third Party Program.

1. Program Purpose:

*TRC's Third Party Program will be limited to its clients that hire TRC for assistance with enrollment into the Program. TRC's services shall include but not limited to conducting an assessment of compliance with standard conditions, development of a water resource protection plan, monitoring and reporting per Appendix C of the Order, and development and supervision of cleanup and restoration plans, if applicable (Tier 3). In addition, TRC will likely be involved with obtaining CDFW 1600 permits and assisting landowners with Division of Water Rights registrations and statements. TRC's Third Party Program is not available for individuals seeking self certification without our direct involvement. For TRC's clients choosing to enroll in the program, TRC shall provide the following:*

- a. Tracking names of participating (and non-participating) dischargers.

*The procedure to implement is to simply develop an excel spreadsheet.*

- b. Collecting and submitting required fees.

*TRC will create a transaction account or demand deposit account held at a bank or other financial institution for the collection and submission of fees. TRC will manage the account using business accounting software, and will follow "Generally Accepted Accounting Principles, which are the commonly accepted ways of recording and reporting accounting information. The development of said account shall be reviewed by TRC's Certified Public Accountant prior to use. Fees payable to the Water Board shall be consistent with CALIFORNIA PROMPT PAYMENT ACT, Government Code, Section 927, et seq.*

- c. Managing communication and notifications between participating dischargers and the Regional Water Board, including informing growers of the Order and status of implementation.

*On August 18, 2015 TRC mailed out a letter to 105 clients describing the Order and TRC's ability to assist landowners with enrollment. The response to date has been good. If TRC's Third Party Program is approved, we are willing and capable of following any recommended protocols for communication between enrollees and the Regional Water Board. Ideally, information will be reported consistent with how other approved third party programs are reporting. TRC presently manages communications for a large client base involving numerous government agencies such as Cal Fire, CDFW, Regional Water Board, CGS, Division of Water Rights, etc. E-mail communication is our recommended choice for correspondence. All records generated that are related to the Order shall be available to Regional Water Board staff, and shall be maintained for at least 2 years following the expiration of the Order.*

- d. Assisting dischargers with identifying the proper tier for a specific site.

*TRC's Third Party Program will be limited to its clients that hire TRC for assistance with enrollment into the Program. As such, TRC will determine the proper tier for a specific site. Based upon the Order, this determination requires a thorough assessment of cultivation site(s) including but not limited to the physical characteristics of the operation such as slope, proximity to surface water, scale of the operation, water sources, season of diversion, etc. All surface waters need to be identified, classified, and mapped using GPS in order to determine compliance with buffer distances. Physical measurement and identification of buffer zones (flagging) may be required when sites are in close proximity to Class I, II or III Watercourses buffers. All sites require thorough assessment to determine compliance with the Standard Conditions.*

- e. Assisting self-certification requirements for dischargers meeting Tier 1 characteristics.

*The procedure to implement first requires that TRC confirm Tier 1 status using procedures abbreviated above in 1(e). Next, TRC will complete and submit the applicable Tier 1 section of the Notice of Intent (NOI) form (Appendix A) and monitoring report self-certification (Appendix C). The completed forms will be provided to the landowner, including a copy of the Order, to be kept on site. TRC provides all of its client's copies of approved permits (CDFW 1600, SDUR, Grading Permits, etc) and recommends keeping all such documents on-site.*

- f. For Tier 2 Dischargers, developing sample water resource protection plans, helping individual dischargers develop individual plans, and/or developing a more comprehensive community plan which individual dischargers agree to abide by.

*TRC intends on developing the water resource protection plans for our clients. TRC has numerous clients interested in potentially participating; however most of these dischargers are not qualified to develop their own plans. TRC firmly believes that professionals need to be involved in this process. Consequently, if our Third Party Program is approved, it will only enroll dischargers that involve our professional expertise. We will recommend other approved Third Party Programs to those clients that only want limited assistance. We will not discourage anyone from attempting enrollment*

*on their own as a means to increase our business. TRC feels very strongly that most dischargers, including some of their consultants, do not have the scientific background and/or experience to conduct some of the assessments required by the Order, let alone to propose appropriate mitigation. As acknowledged by the Order, most of the potential water quality impacts occurring in association with cannabis cultivation on rural lands are associated with erosion and sediment delivery. Identification of erosion sites and an understanding of the hydrologic and geologic processes involved require experience. TRC understands the importance of inclusiveness for maximizing enrollment, however our program chooses quality over quantity.*

- g. Assisting dischargers in implementing water resource protection plans. This must include site inspections and documentation of timely implementation or installation of management measures per schedule in the water resource protection plan, and evaluation of their effectiveness in meeting intended objectives.

*TRC intends on not only developing the water resource protection plans, but more importantly assisting with their implementation. As described in 1(e), TRC will only enroll dischargers who involve our professional expertise, which involves choosing, or at least screening, proper contractors and operators with the technical expertise to implement BMPs. TRC works closely with approximately one dozen skilled equipment operators throughout Humboldt, Mendocino, and Trinity counties. TRC prefers working with licensed timber operators, whom are required to have over 3,000 hours of experience and pass a training class administered by Cal Fire. TRC's involvement will include recommending properly skilled operators and supervising the work to the extent necessary to ensure the work gets done right. Following operations, TRC will make site inspections to ensure proper implementation of the BMPs.*

- h. Monitoring and reporting to Regional Water Board, including compliance with the Order, and effectiveness of management measures.

*TRC will only enroll dischargers who involve our professional expertise, which involves monitoring. Monitoring and reporting shall comply with Appendix C of the Order.*

2. Technical experience and qualifications of the third party program necessary for implementation of technical functions/roles.

*See attached Statement of Qualifications. Any action associated with the implementation of this Order that requires a licensed professional shall be performed by such.*

3. Demonstration of organizational capacity and funding mechanisms to administer the third party program.

- a. *TRC has been an incorporated business since 1998. Its organizational structure is traditional (top down) consisting of the company owner/president (Chris Carroll), an office manager, and numerous qualified field technicians. TRC also works closely with several licensed professionals listed in the attached SOQ. The role of outside consultants will consist primarily of providing second opinions on complex sites. This will most likely involve a geologist and/or engineer. Enrollment into the Order will likely trigger the requirement to obtain permits from other agencies, and our outside consultants will be used indirectly for preparation of permits on our behalf (grading permits, soils/geo reports, etc). They will also be used for enrolling Tier 3 sites until TRC*

has a staff CE or CEG/RG. Any action associated with the implementation of this Order that requires a licensed professional shall be performed by such as required by the California Business and Professions Code and California Code of Regulations. Chris Carroll will provide coordination, supervision and task allocation for TRC's Third Party Program. TRC's field technicians will provide technical expertise in the form of conducting Order required field work and preparing associated technical documents. TRC's office manager will be responsible for tracking names of participating (and non-participating) dischargers, collecting and submitting required fees, overseeing and managing communications between TRC, Dischargers, and the Regional Water Board, and maintaining the database of information needed to satisfy annual compliance reporting to CIWQS. TRC's Third Party Program is funded by consulting fees charged to the participating clients. All records generated that are related to the Order shall be available to Regional Water Board staff, and shall be maintained for at least 2 years following the expiration of the Order.

- b. *Fee collection and submission protocols. TRC's billing cycle is bi-monthly. TRC will reimburse the Regional Water Board within 45 days of receipt of collected fees per CALIFORNIA PROMPT PAYMENT ACT, Government Code, Section 927, et seq. The consulting fees charged to the clients we are enrolling will be variable based upon the complexity of the job. However, consulting fees paid will range from approximately \$1,500-10,000. Most are expected to be in the \$2,500-5,000 range. Many of the enrollments will likely require a CDFW 1600 Notification and/or water registrations, which can be expected to increase the above costs from approximately \$2,500-5,000.*
  - c. *TRC will operate the Third Party Program using sound moral and ethical principles. TRC will work cooperatively with its clients and the Regional Water Board to ensure that Order requirements are fulfilled. TRC will abide by the concept of Presumption of Deference and Weight To Agency Interpretation in light of the fact that the Order was created by the same agency charged with its administration. Any disputes or professional disagreements over technical interpretations, such as treatments of complex erosion sites, will be resolved by contacting the Regional Water Board staff. TRC has attached a Statement of Qualifications for the Regional Water Board's review.*
4. Demonstration of organizational capacity and funding mechanisms to administer the third party program.

*TRC intends on enrolling its clients that choose to use our technical services for such enrollment. This will limit the number of enrollees coming into our Third Party Program given the time needed to conduct field assessments, develop WRPPs, and comply with monitoring and reporting requirements. TRC will focus on quality rather than quantity given our chosen role. TRC provides similar supervision of projects for its numerous clients, which involve preparing and administrating CEQA permits from various agencies and subsequent post-operational monitoring and reporting. TRC presently manages approximately 100,000 acres of timber and ranch lands located in Mendocino, Humboldt, and Trinity Counties.*

5. Sample water resource protection plan.

*See attached.*

6. Framework for annual compliance reporting to CIWQS or other program, as approved by the Executive Officer.
  - a. Number of enrollees in each tier category, by subwatershed;
  - b. Total fees charged;
  - c. Compliance status (for example, how many Tier 2 Dischargers are either in the process of developing water resource protection plans, how many have developed and are implementing plans, how many are in compliance with standard conditions, how effective are BMPs, what changes or improvements are proposed to improve program effectiveness or compliance rate); and
  - d. Monitoring information for each of the parameters listed in the MRP.

*Given TRC's desired role and involvement for enrolling Dischargers into its Third Party Program, TRC will have all of the required information/records needed above. TRC shall provide annual monitoring and any other required compliance information to the Regional Water Board. All records generated that are related to the Order shall be available to Regional Water Board staff, and shall be maintained for at least 2 years following the expiration of the Order. Any information provided to the Regional Water Board shall adhere to eSMR business rules for reporting to CIWQS.*

7. Sample liability waiver that demonstrates that the responsibility falls to the landowner/operator of the site to meet the stated terms and conditions of this Order.

*See attached.*

8. Framework for confirmation of compliance with standard conditions and developed plans and addressing non-compliance by individual third party enrollees.

*TRC's Third Party Program by design requires our supervision throughout the various phases of enrollment. The monitoring and reporting phase requires sites to be monitored at specified times to ensure timely identification of changed site conditions and to determine whether implementation of additional management measures is necessary to iteratively prevent, minimize, and mitigate discharges of waste to surface water. These inspections will confirm compliance with standard conditions. Ideally, the Regional Water Board will develop a communication protocol for approved Third Party Programs to provide this information in a consistent manner. TRC's Third Party Program will have all of the information needed by the Regional Water Board.*

Sincerely,



Chris Carroll, RPF# 2628  
Timberland Resource Consultants

## TRC's Statement of Qualifications



## **STATEMENT OF QUALIFICATIONS**

165 South Fortuna Blvd  
Fortuna, CA 95540  
707-725-1897  
707-725-0972 Fax  
[trc@timberlandresource.com](mailto:trc@timberlandresource.com)

## **Timberland Resource Consultants, Inc**

Established in 1998, TRC is a small business that provides professional services in natural resources permitting, inventory, analysis, appraisal, planning, and management throughout Northern California. Clients include state and federal agencies, industrial timber companies, ranchers, small farmers, and non-industrial timberland owners.

TRC's resource professionals offer a wide range of consulting services in forestry, watershed, and biological resource management. We specialize in the preparation of timber harvest plans, non-industrial timber management plans, timber and land appraisal, timberland and ranch management, road assessments, stream alteration agreements, water rights permits, and erosion control plans.

President: Chris Carroll, Registered Professional Forester #2628

Foresters: Nick Robinson, Ron Pelletier

Wildlife Biologist: Jack Henry

## **Outside Consultants**

Shane M. Beach, Registered Geologist #7396

David N. Lindberg @ Lindberg Geologic Consulting, CEG #1895

Joshua T. McKnight @ Trinity Valley Consulting Engineers, CE #60687

Praj. O. White @ Manhard Consulting, CE #65025

Nathan K.Toews, CE #70251

## Experience

TRC has been conducting erosion control plans for over 15 years throughout the state. Road and stream erosion assessments have become a requirement for Timber Harvest Plans and are now mandated by the Forest Practice Rules, Fish and Game Code, and Water Quality Control Board. What was once limited to special projects is now common practice in the permitting arena of the timber industry. Our firm prepares approximately 10-15 large scale road assessments per year. These assessments and technical reports are in association with THPs, NTMPS, CDFW Stream Alteration Agreements, Waste Discharge Permits, and restoration/remediation plans. These assessments are thoroughly reviewed by the Department of Fish and Wildlife, Water Quality, California Geologic Survey, and Cal Fire. Lastly, our assessments and their associated mitigation measures are implemented on the ground by Licensed Timber Operators thus providing our staff constant feedback and quality control. TRC's assessment methodology is consistent with the guidelines found in *California Salmonid Stream Habitat Restoration Manual - Part X, Upslope Erosion Inventory and Sediment Control Guidance*, which is the CDF&W's methodology for the identification of upslope and stream bank erosion.

**Travis Ranch Road Assessment:** 2016. TRC is presently developing a protocol for a road assessment and sediment prevention plan on the Travis Ranch, a 12,000 acre ranch located in southern trinity county. The assessment and plan will be used to develop a Routine Maintenance Agreement with the CDFW per Fish and Game Code 1600.

**Hunter Ranch Road Assessment:** Ongoing: TRC is presently conducting a road assessment on the Hunter Ranch, a 16,000 +/- acre ranch located in the Mad River drainage. The assessment will be used to develop a Sediment Prevention Plan and a Routine Maintenance Agreement with the CDFW per Fish and Game Code 1600.

**NRCS Silva Creek Restoration Project:** 2014. This on-going project includes the upgrading of existing ranch roads located in the Silva Creek watershed, which is tributary to the Salt River. It involves 18 sites consisting of new bridges, culvert upgrades, road surface rocking, rip-rapping unstable fillslopes, installation of rock rolling dips and rock fords. This project is expected to save approximately 1,066

yards of sediment. TRC prepared the CDFW Stream Alteration Agreement (1600-2013-0183-R1) and supervised the implementation of the project.

**GRIZZLY CREEK RANCH ROAD ASSESSMENT:** 2013-2014. TRC conducted a road assessment and sediment prevention plan on approximately 690 acres. The assessment identified over 75 road points proposed to be corrected per 1-00NTMP-054 HUM.

**BEAR CREEK RANCH ROAD ASSESSMENT:** 2012. Updated 2015. TRC conducted a road assessment and sediment prevention plan on approximately 3,000 acres. The assessment identified over 350 road points that will be corrected per 1-12NTMP-001HUM and CDFW Notification No. 1600-2013-0357-R1.

**SUPPLY CREEK 1600:** 2012-2013. TRC conducted a road assessment on approximately 4,000 acres and prepared and implemented a property wide CDFW Stream Alteration Agreement (1600-2012-0251-R1) for the upgrade of over 47 crossings and hundreds of road related non-notification points.

**SALT RIVER UPSLOPE ASSESSMENT:** 2008-2009. TRC was hired by Humboldt County Resource Conservation District (RCD) to conduct a road related sediment source inventory within the Francis Creek and Williams Creek watersheds. This assessment included the mapping of stream bank erosion located along Francis Creek and Williams Creek. This assessment has been used by numerous landowners to procure funding for sediment reduction projects throughout the two watersheds.

**FRANCIS CREEK ROAD IMPROVEMENT PROJECT:** 2007. TRC conducted a watershed road erosion hazard assessment on the Francis Creek Ranch using CDFW accepted protocols. The assessment identified all recognizable current & future sediment sources from the road system within the watershed assessment area. This assessment was used to secure cost-share funding from the RCD and CDFW for the treatment of 3.8 miles of ranch road. TRC prepared the CDFW Stream Alteration Agreement (R1-08-0315) and supervised the implementation of the project.

**HRC HCP THPS:** Since 1998 TRC has prepared over 50 Timber Harvest Plans for lands formerly owned by Scotia Pacific Holding Company on Humboldt Redwood Company timberlands. As required by the Habitat Conservation Plan (HCP), all THPs require road assessments and sediment reduction calculations such that all

sediment generated by harvesting activities can be quantified and offset by road related improvements.

**Water Quality Waste Discharge Permits:** TRC prepares approximately one half dozen technical reports per year required under the General WDRs, which include an Erosion Control Plan (ECP). ECPs require an inventory of all controllable sediment discharge sources within the Project area, and, a time schedule for implementation of prevention and minimization management measures from all controllable sediment discharge sources within the Project area. The implementation of prevention and minimization management measures must be completed during the period of coverage under General WDRs.

**Department of Fish and Wildlife 1602 Permits:** TRC prepares 1600 notifications in association with streambed alterations primarily associated with new and reconstructed stream crossings on roads, and watercourse diversions for dust abatement and domestic/agricultural use. TRC has prepared over 30 such Notifications in 2015.

**Division of Water Rights Registrations:** TRC annually prepares Small Domestic Use Registrations, Registration for Livestock Stockpond Use Appropriations, and Initial Statement of Water Diversion and Use. A large majority of these registrations and statements are for cannabis cultivators on private land. TRC has prepared nearly 50 registrations and statements in 2015.

#### **Discussion of TRC's Clients:**

TRC is presently working for numerous cannabis cultivators throughout Humboldt, Mendocino, and Trinity Counties. If TRC's Third Party Program is approved by the Water Board we expect many of these clients to enroll in the Order. We have gained the trust of many small farmers to become environmentally compliant and permitted.

#### **Discussion of TRC's Approach:**

TRC's is in favor of the interdisciplinary approach for assessing water quality impacts and proposing mitigation measures. We encourage agency pre-consultations and the use of outside specialists such as geologists, botanists, biologists, hydrologists, and engineers when required and where applicable. TRC uses licensed professionals as required by the California Business and Professions

Code and California Code of Regulations. TRC prefers to conduct field assessments in the winter when erosion is most noticeable. Many potential sources of sedimentation are undetectable in the summer months when the water table lowers and ephemeral watercourses, seeps, and springs disappear. Annual road grading activities occurring in the late spring and early summer remove all signs of this past erosion.

# Sample Water Resource Protection Plan

**Water Resource Protection Plan  
For  
APN 123-456-78**

*Submitted to:*

California Regional Water Quality Control Board -  
North Coast Region  
5550 Skylane Boulevard, Suite A  
Santa Rosa, California 95403

*Prepared by:*

Chris Carroll, RPF #2628  
Timberland Resource Consultants  
165 South Fortuna Blvd  
Fortuna, CA 95540

12-29-2015

## Purpose

This Water Resource Protection Plan (WRPP) has been prepared on behalf of the property owner, #####, by agreement and in response to the California Water Code Section 13260(a), which 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 conditions. Order R1-2015-0023 conditionally waives the requirement to file a ROWD for discharges and associated activities described in finding 4.

## Scope of Report

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."

## Methods

The methods used to develop this WRPP include both field and office components. The office component consisted of reviewing soil maps (California Cooperative Soil-Vegetation Survey), CGS Geomorphic Features Map (North Coast Watersheds Mapping, DMG CD 99-002, 1999), and THP #-##-### HUM, which is a THP that overlaps the project area. The field component included identifying and accurately mapping all watercourses, wet areas, and wetlands located downstream of the cultivation areas, associated facilities, and all appurtenant roads accessing such areas. An accurate location of the Waters of the State is necessary to make an assessment of whether potential and existing erosion sites/pollution sites have the potential to discharge waste to an area that could affect waters of the State (including groundwater). Next, all cultivation areas, associated facilities, and all appurtenant

## Methods (Cont.)

roads accessing such areas were assessed for discharges and related controllable water quality factors from the activities listed in Order R1-2015-0023, Finding 4a-j. The field assessment also included an evaluation and determination of compliance with the Standard Conditions per Provision I.B of Order No. R1-2015-0023. The water resource protection plans required under Tier 2 are meant to describe the specific measures a discharger implements to achieve compliance with standard conditions. Therefore, all required components of the water resource protection plan per Provision I.B of Order No. R1-2015-0023 were physically inspected and evaluated. A comprehensive summary of each Standard Condition as it relates to the subject property is appended.

## Identified Sites Requiring Remediation

Unique Map Point(s)	Map Point Description	Associated Standard Condition	Temporary BMP	Permanent BMP	Priority for Action	Time Schedule for completion of Permanent BMP	Completion Date
1	Rutting and gullies on existing road	A(1)(a) A(1)(b)	N/A	Apply surface rock to approximately 200-foot segment of road. Re-construct existing drainage facility (rolling dip/grade break) at Map Point 1.	1	11/15/16	
2	Rutting and gullies on existing road	A(1)(a) A(1)(b)	N/A	Re-construct existing drainage facility (rolling dip/grade break) at Map Point 2.	1	11/15/16	
3	Rutting and gullies on existing road	A(1)(a) A(1)(b)	N/A	Re-construct existing drainage facility (rolling dip/grade break) at Map Point 3.	1	11/15/16	
4	Non-biodegradable garbage in plant waste spoils site	11(b) 11(c)	N/A	Remove garbage and refuse	2	11/15/17	
Located throughout the developed area as defined on WRPP Map	Non-biodegradable garbage and refuse not contained	11(b) 11(c)	Remove garbage and refuse	Trash containers of sufficient size and number shall be provided and properly serviced to contain the solid waste generated by the project.	2	11/15/17	

Treat Priority: The time frame for treatment of the site. (1) would indicate a very high priority with treatment being planned to occur immediately. (2) would indicate a high priority site with treatment to occur prior to the start of the winter period (Nov. 15). (3) would indicate a moderate priority with treatment being planned to occur within a year 1, or prior to the winter period (Nov. 15) of the 2<sup>nd</sup> season of operations. (4) would indicate a low priority with treatment being planned to occur in the shortest time possible, but no later than the expiration of this Order (five years).

## **Monitoring Plan**

Tier 2 Dischargers shall include a monitoring element in the water resource protection plan that at a minimum provides for periodic inspection of the site, checklist to confirm placement and efficacy of management measures, and document progress on any plan elements subject to a time schedule. Tier 2 Dischargers shall submit an annual report (Appendix C) by March 31 of each year that documents implementation and effectiveness of management measures during the previous year. Tier 2 annual reporting is a function that may be provided through an approved third party program.

Monitoring of the site includes visual inspection and photographic documentation of each feature of interest listed on the site map, with new photographic documentation recorded with any notable changes to the feature of interest. At a minimum, all site features must be monitored annually, to provide the basis for completion of the annual re-certification process. Additionally, sites shall be monitored at the following times to ensure timely identification of changed site conditions and to determine whether implementation of additional management measures is necessary to iteratively prevent, minimize, and mitigate discharges of waste to surface water: 1) just prior to October 15 to evaluate site preparedness for storm events and storm water runoff, 2) following the accumulation of 3" total precipitation or by November 15, whichever is sooner, and 3) following any rainfall event with an intensity of 3" precipitation in 24 hours. Precipitation data can be obtained from the National Weather Service Forecast Office (e.g. by entering the zip code of the parcel location at <http://www.srh.noaa.gov/forecast>).

### **Inspection Personnel Contact Information:**

Chris Carroll  
Timberland Resource Consultants  
165 South Fortuna Blvd, Fortuna CA 95540  
707-725-1897

## **Monitoring Plan Reporting Requirements**

Order No. R1-2015-0023, Appendix C must be submitted to the Regional Water Board or approved third party program upon initial enrollment in the Order (NOI) and annually thereafter by March 31. Forms submitted to the Regional Water Board shall be submitted electronically to [northcoast@waterboards.ca.gov](mailto:northcoast@waterboards.ca.gov). If electronic submission is infeasible, hard copies can be submitted to: North Coast Regional Water Quality Control Board, 5550 Skylane Boulevard, Suite A, Santa Rosa, CA 95403.

# Water Resource Protection Plan

## Assessment of Standard Conditions for APN 123-456-78

### A. Standard Conditions, Applicable to All Dischargers

1. Site maintenance, erosion control and drainage features
  - a. Roads shall be maintained as appropriate (with adequate surfacing and drainage features) to avoid developing surface ruts, gullies, or surface erosion that results in sediment delivery to surface waters.

**Road assessment revealed one location (Map Point 1) where poor road drainage could potentially result in sediment delivery to a stream. See attached photo documentation and maps. Please note that two additional road locations were identified for mitigation (Map Points 2,3); however these are not capable of sediment delivery due to their distance from downstream watercourses. BMP 72 & 73.**

- b. Roads, driveways, trails, and other defined corridors for foot or vehicle traffic of any kind shall have adequate ditch relief drains or rolling dips and/or other measures to prevent or minimize erosion along the flow paths and at their respective outlets

**Road assessment revealed three locations (Map Points 1,2,3) which require reconstruction of an existing drainage facility (rolling dip/grade break) to minimize road surface erosion. Please note that the developed areas, which contain the cultivation area and other appurtenant facilities, are located greater than 400 feet from a watercourse.**

- c. Roads and other features shall be maintained so that surface runoff drains away from potentially unstable slopes or earthen fills. Where road runoff cannot be drained away from an unstable feature, an engineered structure or system shall be installed to ensure that surface flows will not cause slope failure.

**There are no unstable areas within the property. The Geomorphic Features Map for the Miranda 7.5' Quadrangle, Humboldt County, California Scale 1:24,000 (Kelley, F.R., 1984, DMG Open-File Report 84-38) shows no unstable areas or geomorphic features within or nearby the property. Physical reconnaissance of property revealed no unstable areas per 14CCR 895.1.**

- d. Roads, clearings, fill prisms, and terraced areas (cleared/developed areas with the potential for sediment erosion and transport) shall be maintained so that they are hydrologically disconnected<sup>1</sup>, as feasible, from surface waters, including wetlands, ephemeral, intermittent and perennial streams.

**Road assessment revealed one location (Map Point 1) where poor road drainage could potentially result in sediment delivery to a stream. See attached photo documentation and maps. As previously noted, the cleared/developed areas associated with cultivation are located greater than 400 feet from a watercourse.**

<sup>1</sup> Connected roads are road segments that deliver road surface runoff, via the ditch or road surface, to a stream crossing or to a connected drain that occurs within the high delivery potential portion of the active road network. A connected drain is defined as any cross-drain culvert, water bar, rolling dip, or ditch-out that appears to deliver runoff to a defined channel. A drain is considered connected if there is evidence of surface flow connection from the road to a defined channel or if the outlet has eroded a channel that extends from the road to a defined channel. ([http://www.forestsandfish.com/documents/Road\\_Mgmt\\_Survey.pdf](http://www.forestsandfish.com/documents/Road_Mgmt_Survey.pdf))

- e. Ditch relief drains, rolling dip outlets, and road pad or terrace surfaces shall be maintained to promote infiltration/dispersal of outflows and have no apparent erosion or evidence of soil transport to receiving waters.

**Not applicable**

- f. Stockpiled construction materials are stored in a location and manner so as to prevent their transport to receiving waters.

**Not applicable**

## 2. Stream Crossing Maintenance

- a. Culverts and stream crossings shall be sized to pass the expected 100-year peak streamflow.
- b. Culverts and stream crossings shall be designed and maintained to address debris associated with the expected 100-year peak streamflow.
- c. Culverts and stream crossings shall allow passage of all life stages of fish on fish-bearing or restorable streams, and allow passage of aquatic organisms on perennial or intermittent streams.
- d. Stream crossings shall be maintained so as to prevent or minimize erosion from exposed surfaces adjacent to, and in the channel and on the banks.
- e. Culverts shall align with the stream grade and natural stream channel at the inlet and outlet where feasible.<sup>2</sup>
- f. Stream crossings shall be maintained so as to prevent stream diversion in the event that the culvert/crossing is plugged, and critical dips shall be employed with all crossing installations where feasible.<sup>3</sup>

**There are no stream crossings anywhere on the property.**

## 3. Riparian and Wetland Protection and Management

- a. For Tier 1 Dischargers, cultivation areas or associated facilities shall not be located within 200 feet of surface waters. While 200 foot buffers are preferred for Tier 2 sites, at a minimum, cultivation areas and associated facilities shall not be located or occur within 100 feet of any Class I or II watercourse or within 50 feet of any Class III watercourse or wetlands. The Regional Water Board For Tier 1 Dischargers, cultivation areas or associated facilities shall not be located within 200 feet of surface waters. While 200 foot buffers are preferred for Tier 2 sites, at minimum, cultivation areas and associated facilities shall not be located or occur within 100 feet of any Class I or II watercourse or within 50 feet of any Class III watercourse or wetlands. The Regional Water Board or its or its Executive Officer may apply additional or alternative<sup>4</sup> conditions on enrollment, including site-specific riparian buffers and other BMPs beyond those identified in water resource protection plans to ensure water quality protection.
- b. Buffers shall be maintained at natural slope with native vegetation.
- c. Buffers shall be of sufficient width to filter wastes from runoff discharging from production lands and associated facilities to all wetlands, streams, drainage ditches, or other conveyances.

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<sup>2</sup>At a minimum, the culvert shall be aligned at the inlet. If infeasible to align the culvert outlet with the stream grade or channel, outlet armoring or equivalently effective means may be applied.

<sup>3</sup>If infeasible to install a critical dip, an alternative solution may be chosen.

<sup>4</sup>Alternative site-specific riparian buffers that are equally protective of water quality may be necessary to accommodate existing permanent structures or other types of structures that cannot be relocated.

- d. Riparian and wetland areas shall be protected in a manner that maintains their essential functions, including temperature and microclimate control, filtration of sediment and other pollutants, nutrient cycling, woody debris recruitment, groundwater recharge, streambank stabilization, and flood peak attenuation and flood water storage.

**The cultivation areas or associated facilities are located no closer than 400 feet from a watercourse. As shown on the attached aerial photograph, the watercourses and their associated buffer zones are located below the mainline rocked road with buffer zones consisting of dense second growth redwood, Douglas-fir, and tanoak. Understory vegetation is dominated by evergreen huckleberry with an extremely dense layer of duff and leaf litter. There is no visible evidence of erosion or road related runoff occurring below the mainline road.**

#### 4. Spoils Management

- a. Spoils<sup>5</sup> shall not be stored or placed in or where they can enter any surface water.
- b. Spoils shall be adequately contained or stabilized to prevent sediment delivery to surface waters.
- c. Spoils generated through development or maintenance of roads, driveways, earthen fill pads, or other cleared or filled areas shall not be sidecast in any location where they can enter or be transported to surface waters.

**Soil spoils or spent soil is contained in the area photographed and depicted on the attached maps. This site is not wet or unstable, or where slope stability could be adversely affected. The spoil piles are not adjacent to wetlands and/or watercourses. The site is topographically tributary to a Class III Watercourse located approximately 700 feet downstream. The soil spoils are covered with black visqueen tarp in the winter time.**

#### 5. Water Storage and Use:

- a. Size and scope of an operation shall be such that the amount of water used shall not adversely impact water quality and/or beneficial uses, including and in consideration with other water use by operations, instream flow requirements and/or needs in the watershed, defined at the scale of a HUC-12<sup>6</sup> watershed or at a smaller hydrologic watershed as determined necessary by the Regional Water Board Executive Officer.
- b. Water conservation measures shall be implemented. Examples include use of rainwater catchment systems or watering plants with a drip irrigation system rather than with a hose or sprinkler system.
- c. For Tier 2 Dischargers, if possible, develop off-stream storage facilities to minimize surface water diversion during low flow periods.
- d. Water is applied using no more than agronomic rates.<sup>7</sup>
- e. Diversion and/or storage of water from a stream should be conducted pursuant to a valid water right and in compliance with reporting requirements under Water Code section 5101.
- f. Water storage features, such as ponds, tanks, and other vessels shall be selected, sited, designed, and maintained so as to insure integrity and to prevent release into waters of the state in the event of a containment failure.

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<sup>5</sup> Spoils are waste earthen or organic materials generated through grading or excavation, or waste plant growth media or soil amendments. Spoils include but are not limited to soils, slash, bark, sawdust, potting soils, rock, and fertilizers.

<sup>6</sup> See definition and link to maps at: <http://water.usgs.gov/GIS/huc.html>

<sup>7</sup> "Agronomic rates" is defined as the rates of fertilizer and irrigation water that a plant needs to enhance soil productivity and provide the crop or forage growth with needed nutrients for optimum health and growth, without having any excess water or nutrient percolate beyond the root zone.

**A well (approximately 200 feet deep) provides water to the cultivation sites and houses on the property. There are no surface water diversions occurring on the property. The landowner applies water at an appropriate agronomic rate. The water tanks are in locations such that they will not release into waters of the state in the event of a containment failure.**

#### 6. Irrigation Runoff

Implementing water conservation measures, irrigating at agronomic rates, applying fertilizers at agronomic rates and applying chemicals according to the label specifications, and maintaining stable soil and growth media should serve to minimize the amount of runoff and the concentration of chemicals in that water. In the event that irrigation runoff occurs, measures shall be in place to treat/control/contain the runoff to minimize the pollutant loads in the discharge. Irrigation runoff shall be managed so that any entrained constituents, such as fertilizers, fine sediment and suspended organic particles, and other oxygen consuming materials are not discharged to nearby watercourses. Management practices include, but are not limited to, modifications to irrigation systems that reuse tailwater by constructing off-stream retention basins, and active (pumping) and or passive (gravity) tailwater recapture/redistribution systems. Care shall be taken to ensure that irrigation tailwater is not discharged towards or impounded over unstable features or landslides.

**The landowner irrigates at an agronomic rate, which does not produce runoff. An inspection of the cultivation sites revealed no sign of overwatering. The landowner's cultivation sites are greenhouses located approximately 650 feet upslope from the head of the nearest Class III Watercourse as mapped in the field by the RPF using a GPS device. Given the gentle topography, breaks in slope, and distance to downstream watercourses, there is no hydrologic connectivity via surface flow from the cultivation sites to any downstream watercourses.**

#### 7. Fertilizers and Soil Amendments

- a. Fertilizers, potting soils, compost, and other soils and soil amendments shall be stored in locations and in a manner in which they cannot enter or be transported into surface waters and such that nutrients or other pollutants cannot be leached into groundwater.
- b. Fertilizers and soil amendments shall be applied and used per packaging instructions and/or at proper agronomic rates.
- c. Cultivation areas shall be maintained so as to prevent nutrients from leaving the site during the growing season and post-harvest.

**The landowner stores fertilizers at a mixing station as photographed and shown on the attached maps. The two main products used are Roots Trinity & Roots Ancient Amber. Based on the manufacture's website (<http://aurorainnovations.org>), Trinity is an organic fertilizer with NPK / 0.1 - 0.5 - 0.25 and derived from Molasses, Yucca Extract, Kelp Extract (*Ascophyllum nodosum*) And Soy Protein Hydrolysate. Contains Non Plant Food Ingredients Humic Acid, Quillaja Saponaria and Aloe Extract. Ancient Amber is an organic fertilizer with NPK / 0.1 - 0 - 0 and derived from Soybean Fermentation Extract And Nettle Extract. These products are labeled properly and according to the landowner applied according to the label.**

#### 8. Pesticides/Herbicides

At the present time, there are no pesticides or herbicides registered specifically for use directly on cannabis and the use of pesticides on cannabis plants has not been reviewed for safety, human health effects, or environmental impacts. Under California law, the only pesticide products not illegal to use on cannabis are those that contain an active ingredient that is exempt from residue tolerance requirements and either registered and labeled for a broad enough use to include use on cannabis or exempt from registration requirements as a minimum risk pesticide under FIFRA section 25(b) and California Code of Regulations, title 3, section 6147. For the purpose of compliance with conditions of this Order, any uses of

pesticide products shall be consistent with product labeling and any products on the site shall be placed, used, and stored in a manner that ensures that they will not enter or be released into surface or ground waters.

**The landowner uses no chemicals. Instead of pesticides, the landowner sprays lemon juice to control aphids.**

9. Petroleum products and other chemicals

- a. Petroleum products and other liquid chemicals, including but not limited to diesel, biodiesel, gasoline, and oils shall be stored so as to prevent their spillage, discharge, or seepage into receiving waters. Storage tanks and containers must be of suitable material and construction to be compatible with the substance(s) stored and conditions of storage such as pressure and temperature.
- b. Above ground storage tanks and containers shall be provided with a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation.
- c. Dischargers shall ensure that diked areas are sufficiently impervious to contain discharged chemicals.
- d. Discharger(s) shall implement spill prevention, control, and countermeasures (SPCC) and have appropriate cleanup materials available onsite.
- e. Underground storage tanks 110 gallons and larger shall be registered with the appropriate County Health Department and comply with State and local requirements for leak detection, spill overflow, corrosion protection, and insurance coverage.

**The landowner has a 500-gallon gasoline tank and 1,000 gallon diesel tank both of which are pictured and mapped. Each tank is secondarily contained.**

10. Cultivation-related wastes

Cultivation-related wastes including, but not limited to, empty soil/soil amendment/ fertilizer/pesticide bags and containers, empty plant pots or containers, dead or harvested plant waste, and spent growth medium shall, for as long as they remain on the site, be stored<sup>8</sup> at locations where they will not enter or be blown into surface waters, and in a manner that ensures that residues and pollutants within those materials do not migrate or leach into surface water or groundwaters.

**Garbage and refuse is intermixed with plant wastes in the plant waste spoils site as pictured, and shown on the attached maps (Map Point 4). Per BMP 137 & 141 this garbage and refuse shall be collected, contained, and disposed of at an appropriate facility, including for recycling where available.**

11. Refuse and human waste

- a. Disposal of domestic sewage shall meet applicable County health standards, local agency management plans and ordinances, and/or the Regional Water Board's Onsite Wastewater Treatment System (OWTS) policy, and shall not represent a threat to surface water or groundwater.
- b. Refuse and garbage shall be stored in a location and manner that prevents its discharge to receiving waters and prevents any leachate or contact water from entering or percolating to receiving waters.
- c. Garbage and refuse shall be disposed of at an appropriate waste disposal location.

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<sup>8</sup> Plant waste may also be composted, subject to the same restrictions cited above for cultivation-related waste storage.

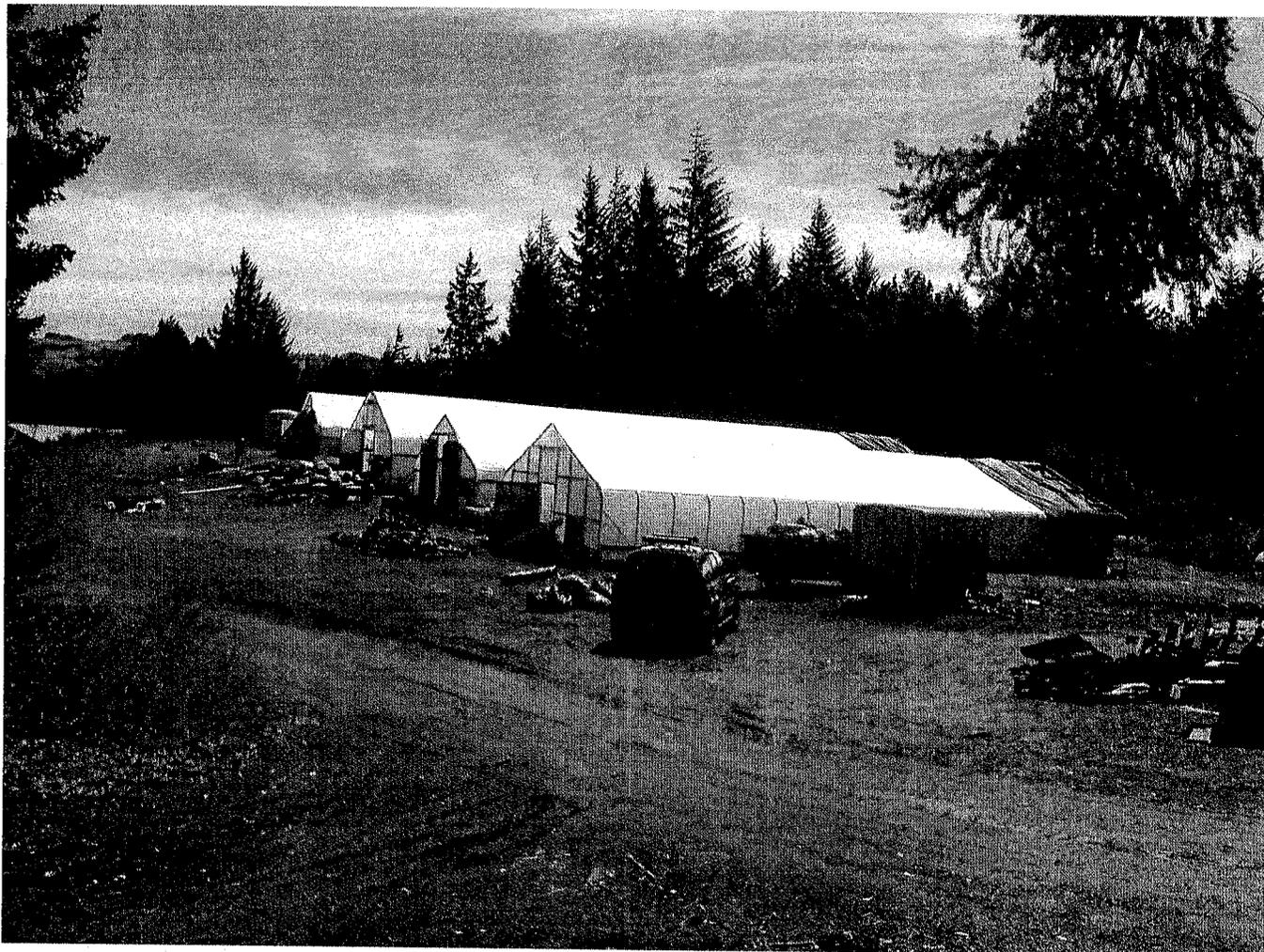
**Garbage and refuse is presently being piled for short term storage within the developed area and is periodically loaded and taken to Eel River Resource Recovery's transfer station located in Redway. Despite the lack of trash containers per BMP 141, the temporary trash piles do not appear to be capable of discharging into a stream. However, the wind is blowing garbage around the developed area and leaching could potentially occur and therefore BMP 141 is recommended to be followed.**

**Human waste disposal systems consist of bathrooms in the two houses which are connected to a septic tank and leach field system.**

12. Remediation/Cleanup/Restoration Remediation/cleanup/restoration activities may include, but are not limited to, removal of fill from watercourses, stream restoration, riparian vegetation planting and maintenance, soil stabilization, erosion control, upgrading stream crossings, road outsloping and rolling dip installation where safe and suitable, installing ditch relief culverts and overside drains, removing berms, stabilizing unstable areas, reshaping cutbanks, and rocking native-surfaced roads. Restoration and cleanup conditions and provisions generally apply to Tier 3 sites, however owners/operators of Tier 1 or 2 sites may identify or propose water resource improvement or enhancement projects such as stream restoration or riparian planting with native vegetation and, for such projects, these conditions apply similarly. Appendix B accompanying this Order includes environmental protection and mitigation measures that apply to cleanup activities such as: temporal limitations on construction; limitations on earthmoving and construction equipment; guidelines for removal of plants and revegetation; conditions for erosion control, limitations on work in streams, riparian and wetland areas; and other measures.

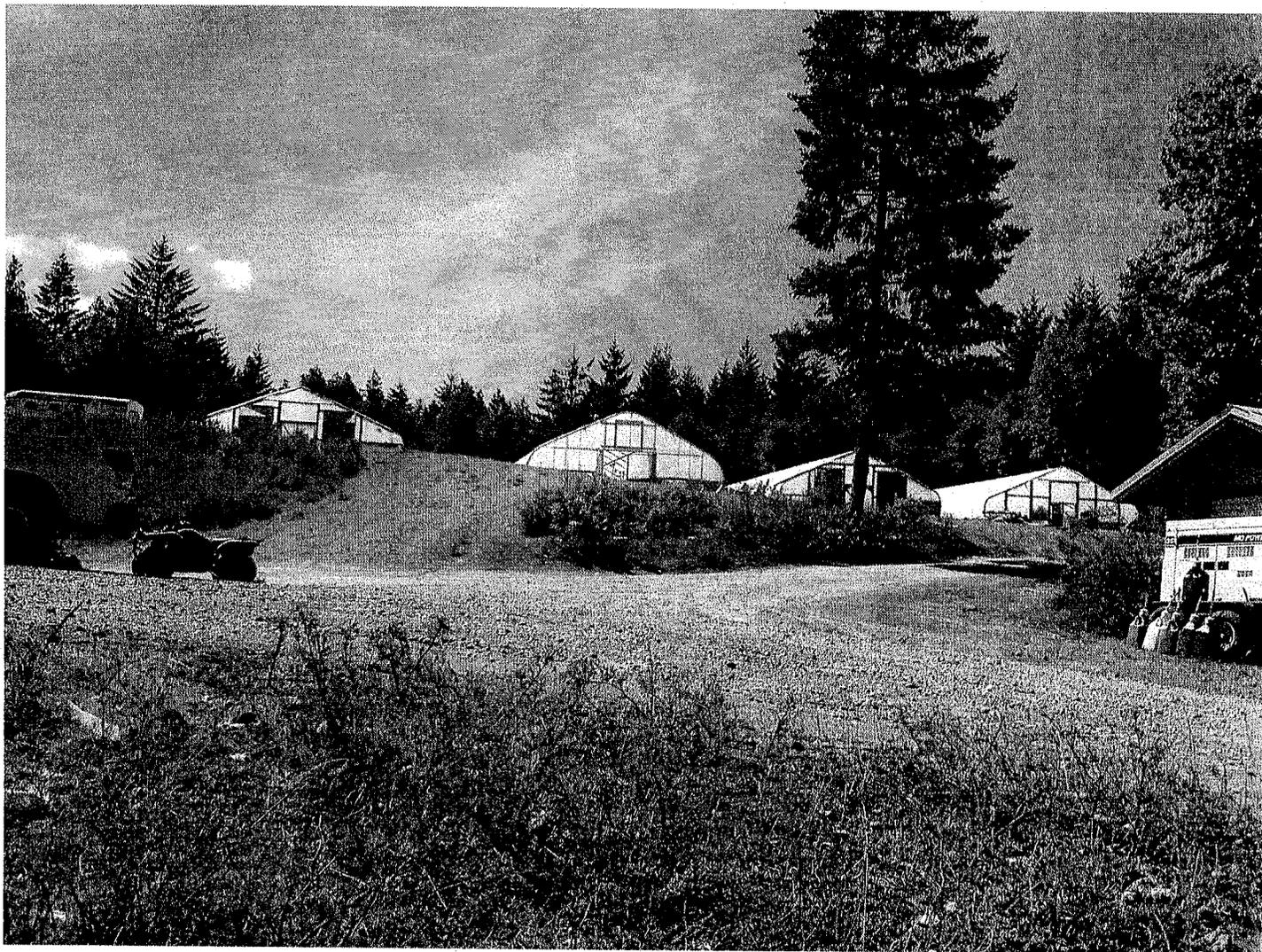
**Mitigation measures are listed in the Water Resource Protection Plan and also noted above in the document.**

## Pictures



Picture 1: This is a photograph of the cultivation area, which is four greenhouses with the following dimensions from front to back: 30-feet by 60-feet; 30-feet by 96-feet; 30-feet by 96-feet; and 30-feet by 96-feet. Picture is taken facing east-southeast. Total area of greenhouses is 10,440 ft<sup>2</sup>. The cleared and developed area associated with the cultivation area is approximately 2.5 acres. Photo date 9-2-2015

## Pictures



Picture 2: This is a photograph of the cultivation area taken facing south. The diesel generator house is on right of photo and residence off photo to left. Fill slopes are stable and vegetated with Douglas-fir seedlings and saplings. Photo date 9-2-2015

## Pictures



Picture 3: This is a photograph of the cultivation area's fill slopes, which are stable and well vegetated with Douglas-fir seedlings and saplings. Photo date 9-2-2015

## Pictures



Picture 4: This is a photograph of the well and associated 5,000 gallon water tank. Photo date 9-2-2015

## Pictures



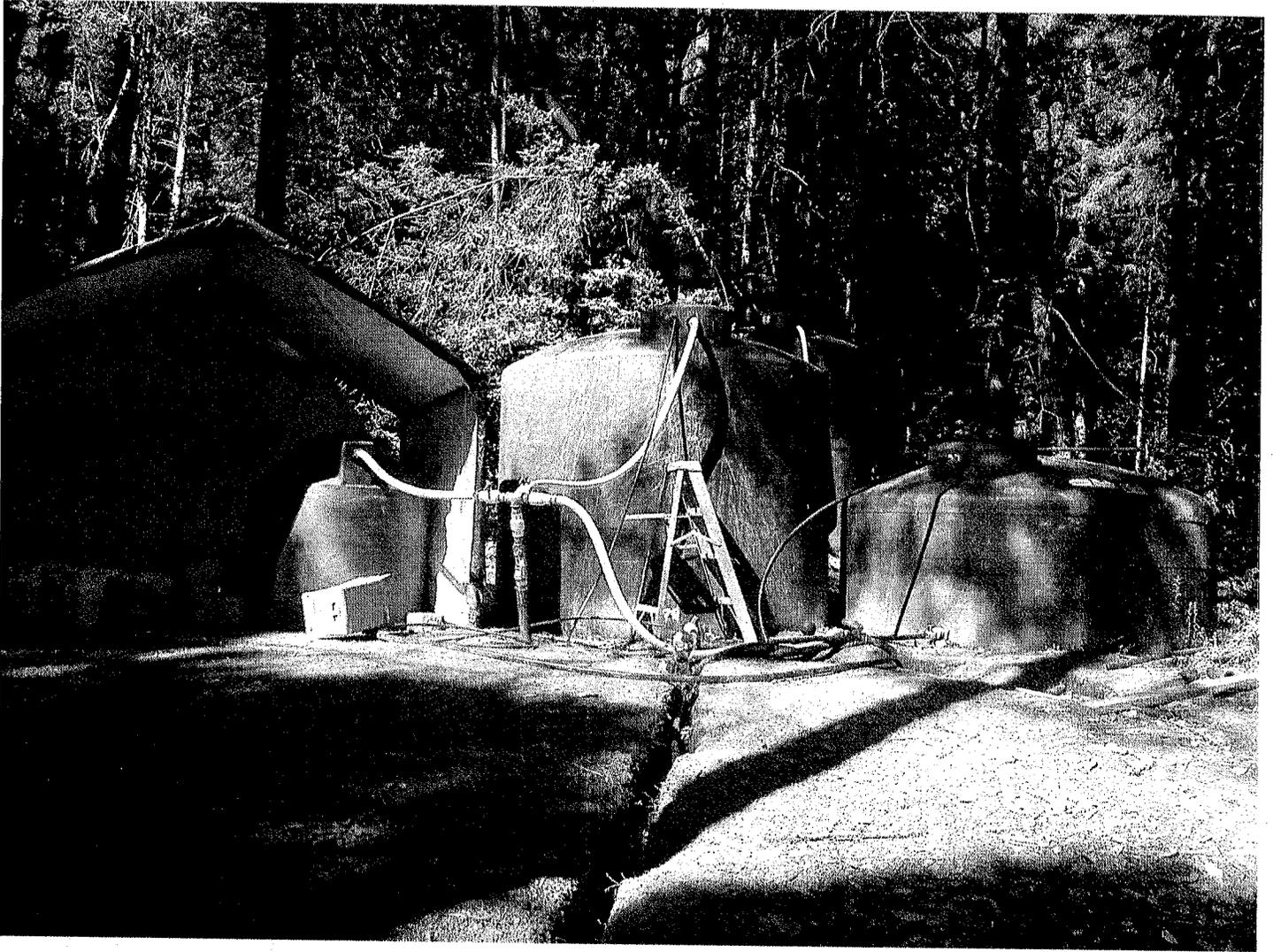
Picture 5: This is a photograph of the 500 gallon gas tank with secondary containment. Photo date 9-2-2015

## Pictures



Picture 6: This is a photograph of the diesel generator shed and associated 1,000 gallon diesel tank with secondary containment. Photo date 9-2-2015

## Pictures



Picture 7: This is a photograph of the nutrient mixing station, which consists of a 3,000 gallon hard plastic tank in background, and from left to right: 300 gallon tank, 2,500 gallon tank, and 1,600 gallon tank. Photo date 9-2-2015.

## Pictures



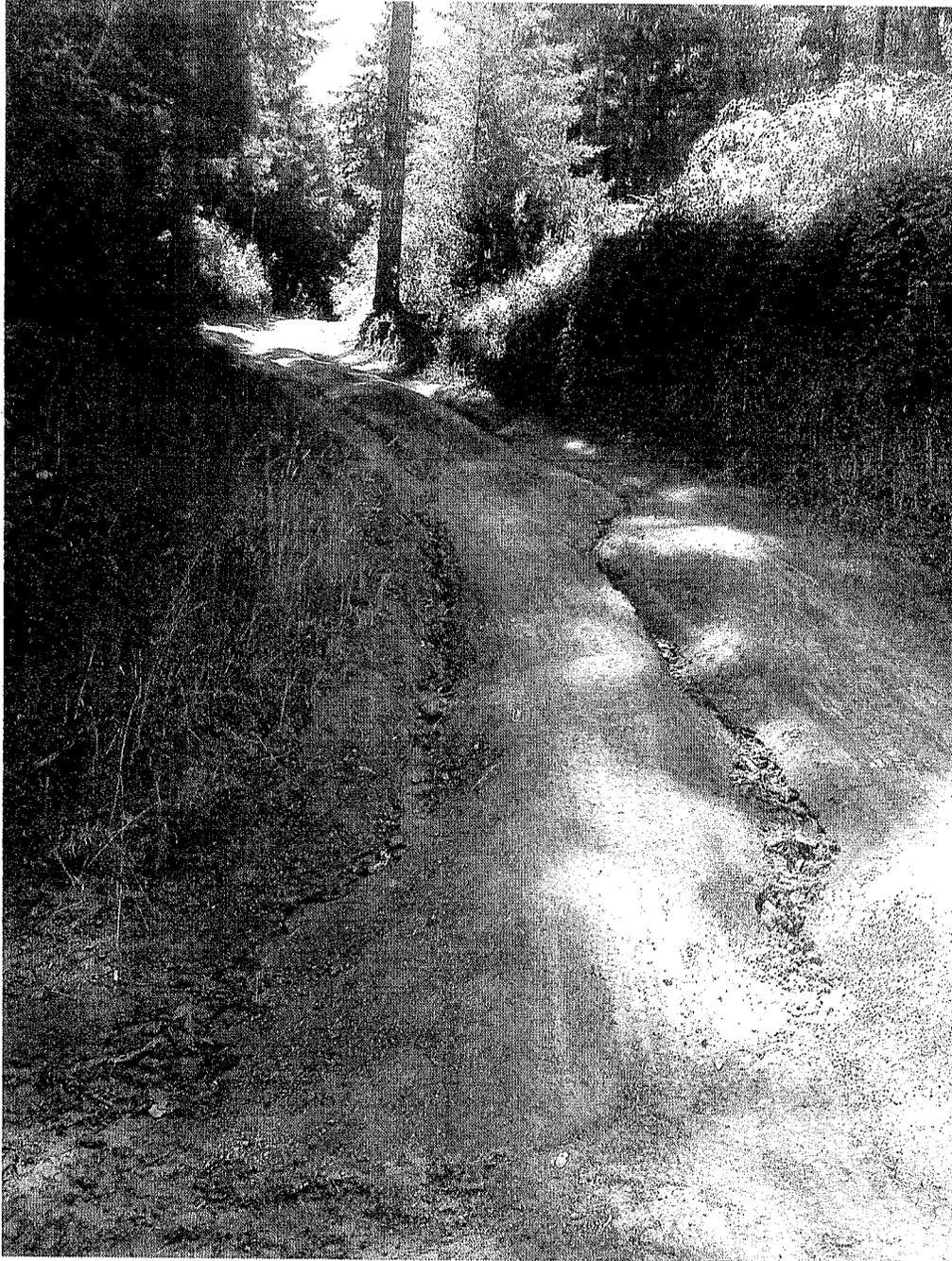
Picture 8: Soil spoils site. Photo date 9-2-2015

## Pictures



Picture 9: Plant waste spoils site. This site contains a mixture garbage and non-biodegradable wastes and therefore in not in compliance with Standard Condition A10. Photo date 9-2-2015

## Pictures



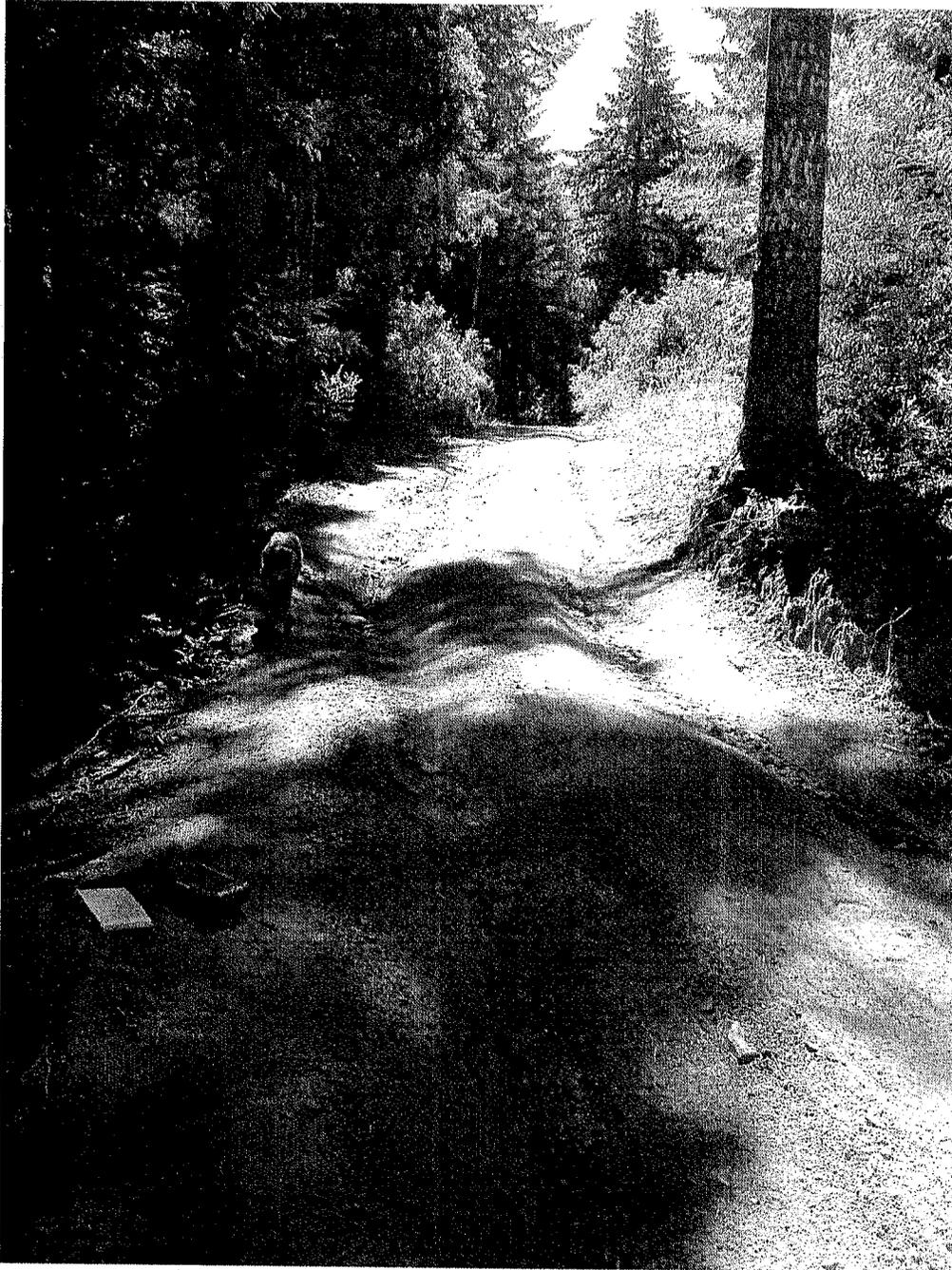
Picture 11: This is a photograph of erosion occurring on the secondary road near Map Point 1. This 200-foot +/- section of road is not in compliance with Standard Condition A1(a), which states, "Roads shall be maintained as appropriate (with adequate surfacing and drainage features) to avoid developing surface ruts, gullies, or surface erosion that results in sediment delivery to surface waters." Photo date 9-2-2015

## Pictures



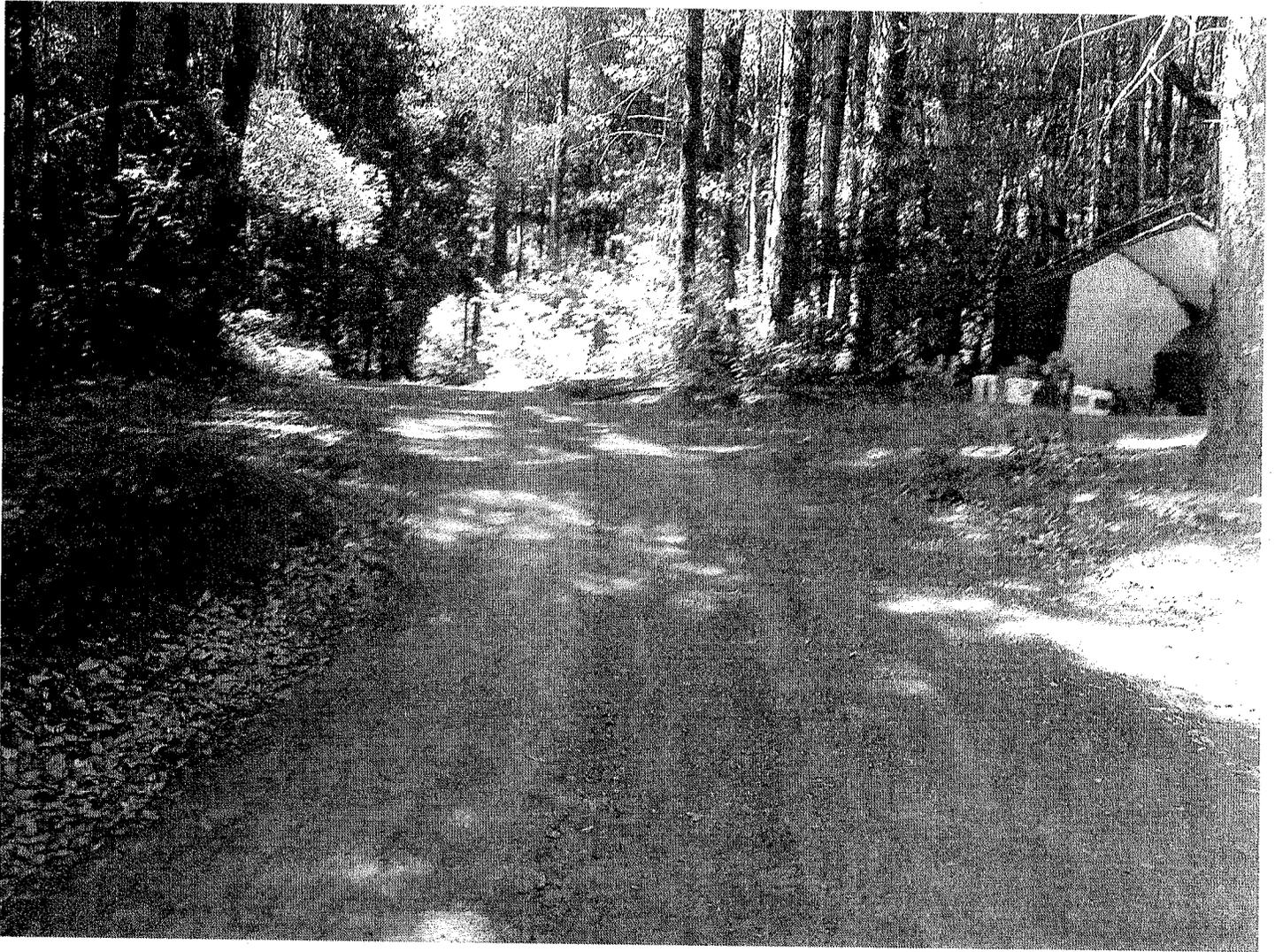
Picture 12: This is a photograph of the erosion occurring at Picture 11 intercepting the mainline rocked road and filling in the inside ditch. The low point in the road, where sediment is accumulating is in the distance near two redwood trees pictured on the outboard edge of road. The Class II spring or head of Class II watercourse is located approximately 75 feet downslope from said low point. This sediment has the potential to reach the downstream Class II watercourse. Photo date 9-2-2015

## Pictures



Picture 13: This is a photograph of the road erosion (Picture 11). Mitigation is to re-install the rolling dip in the location between computer and dog. In addition, it is recommended to discontinue year-round use of this segment of road unless it is rocked for a distance of approximately 200 feet. This location is identified as Map Point 1 on attached maps. This mitigation is necessary for compliance with Standard Condition A1(a). Photo date 9-2-2015.

## Pictures



Picture 14: This is a photograph of a drainage facility (rolling dip/grade break) that needs re-construction to ensure proper road drainage per Standard Condition A1(a). This location is identified as Map Point 2 on attached maps. Photo date 9-2-2015.

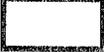
## Pictures



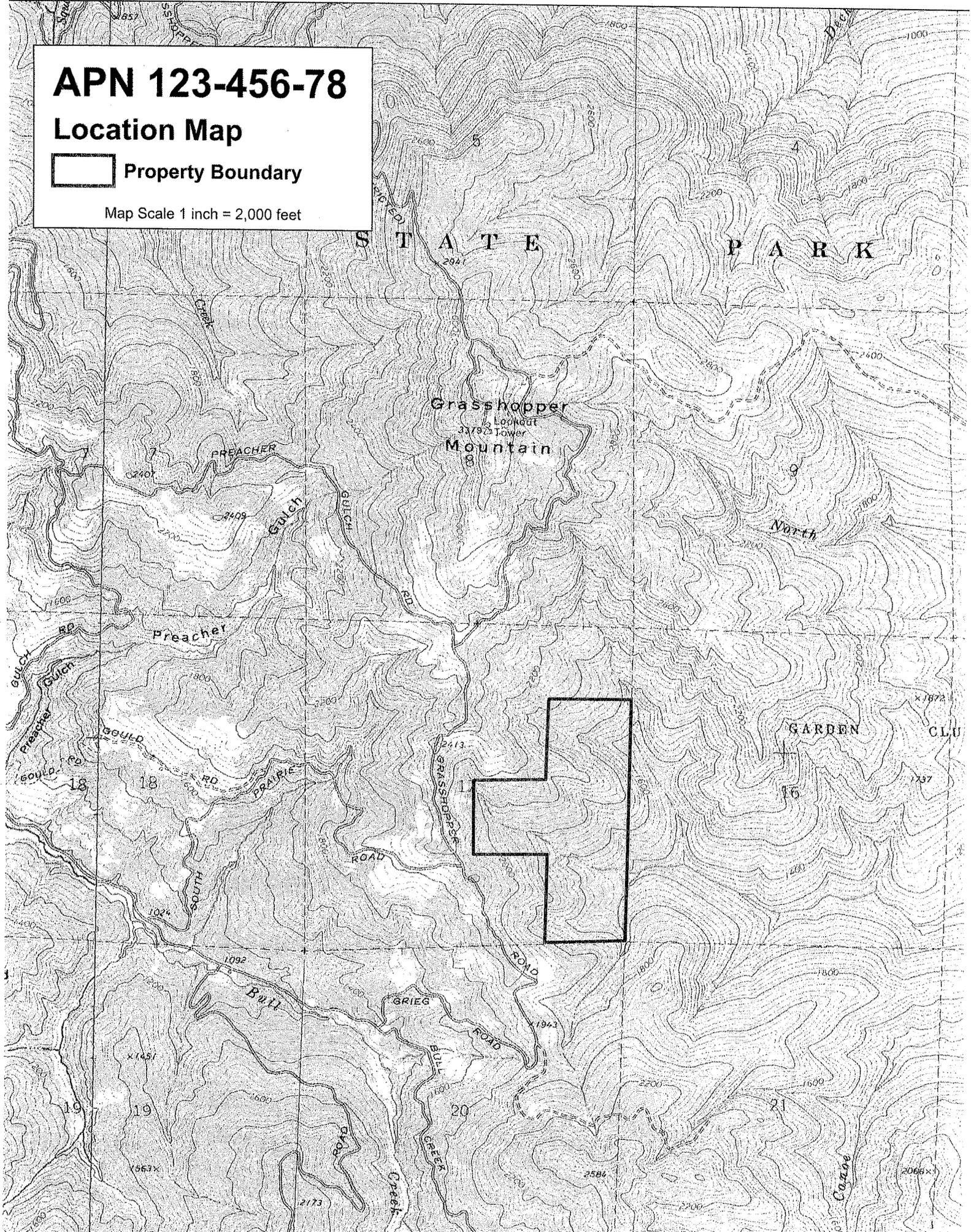
Picture 15: This is a photograph of a drainage facility (rolling dip/grade break) that needs re-construction to ensure proper road drainage per Standard Condition A1(a). This location is identified as Map Point 3 on attached maps. Photo date 9-2-2015.

# APN 123-456-78

## Location Map

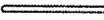
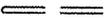
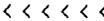
 Property Boundary

Map Scale 1 inch = 2,000 feet

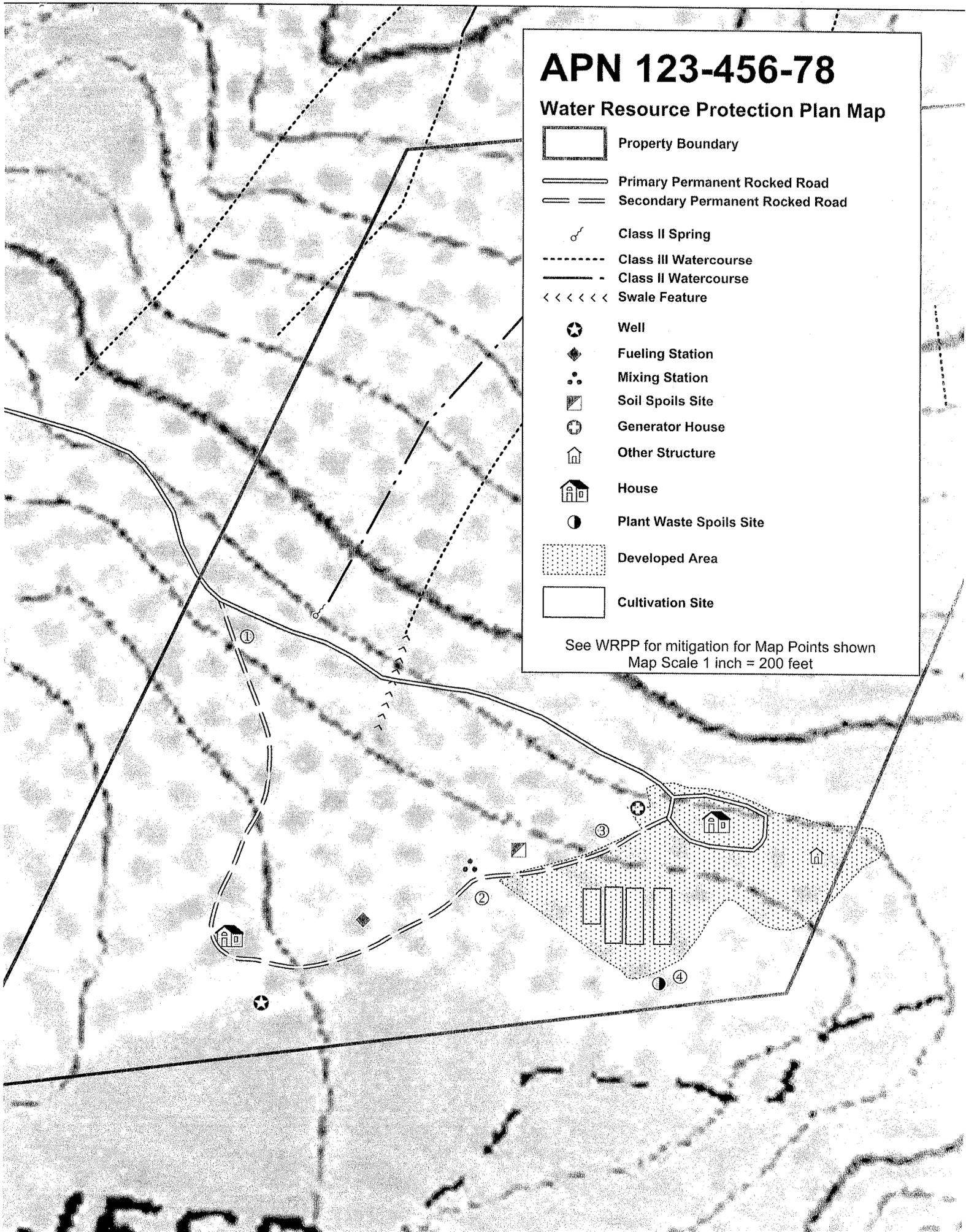


# APN 123-456-78

## Water Resource Protection Plan Map

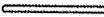
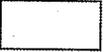
-  Property Boundary
-  Primary Permanent Rocked Road
-  Secondary Permanent Rocked Road
-  Class II Spring
-  Class III Watercourse
-  Class II Watercourse
-  Swale Feature
-  Well
-  Fueling Station
-  Mixing Station
-  Soil Spoils Site
-  Generator House
-  Other Structure
-  House
-  Plant Waste Spoils Site
-  Developed Area
-  Cultivation Site

See WRPP for mitigation for Map Points shown  
Map Scale 1 inch = 200 feet

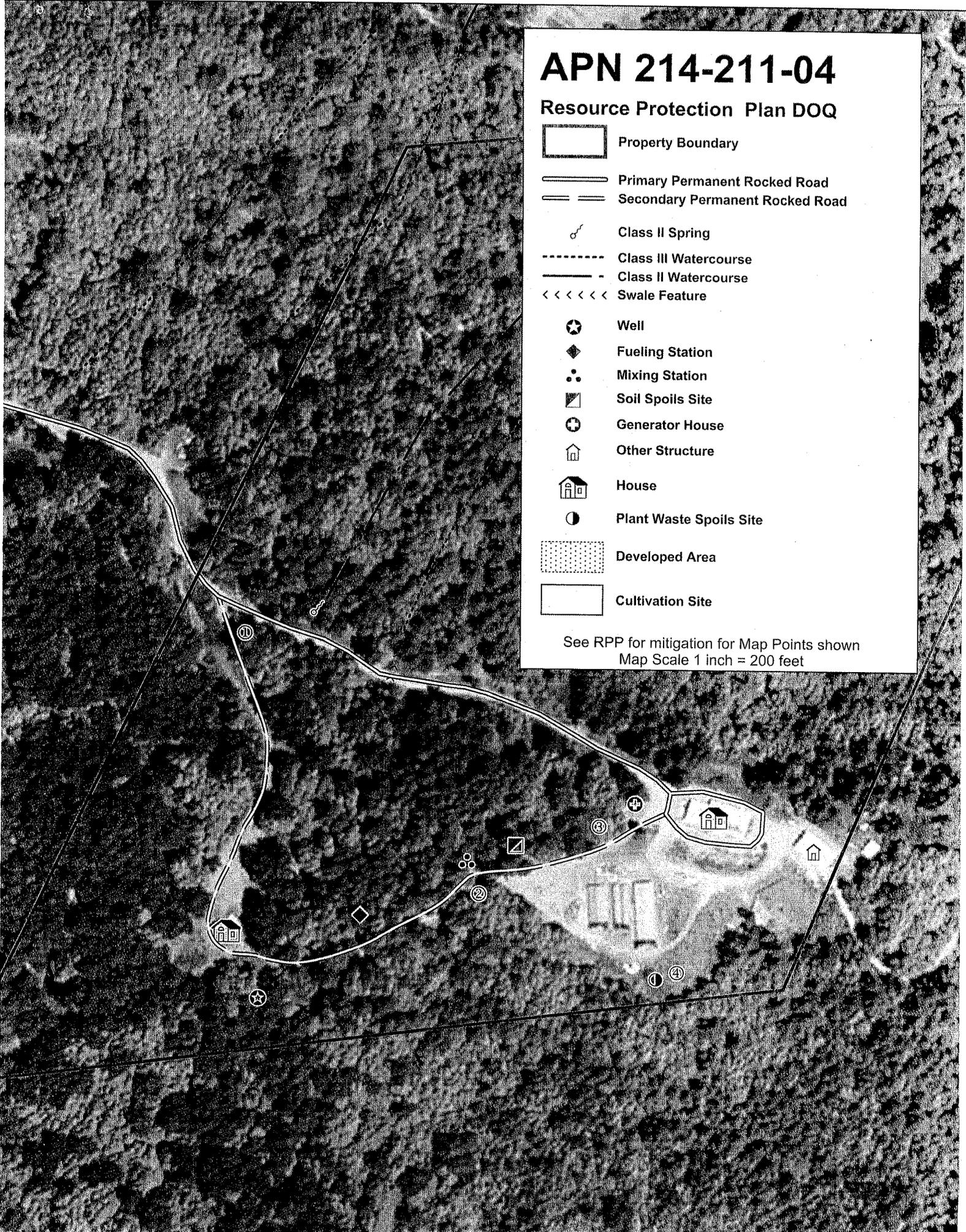


# APN 214-211-04

## Resource Protection Plan DOQ

-  Property Boundary
-  Primary Permanent Rocked Road
-  Secondary Permanent Rocked Road
-  Class II Spring
-  Class III Watercourse
-  Class II Watercourse
-  Swale Feature
-  Well
-  Fueling Station
-  Mixing Station
-  Soil Spoils Site
-  Generator House
-  Other Structure
-  House
-  Plant Waste Spoils Site
-  Developed Area
-  Cultivation Site

See RPP for mitigation for Map Points shown  
Map Scale 1 inch = 200 feet



## Sample Release of Liability Waiver

# RELEASE OF LIABILITY WAIVER

## ORDER R1-2015-0023

I hereby agree to be responsible to meet the stated terms and conditions of Order R1-2015-0023, and to release Timberland Resource Consultants, Inc (TRC) from any claims and demands that may occur in association with the implementation of said Order.

Furthermore, I agree to release TRC and its employees, contractors, and consultants, and will hold them harmless from liability which may arise from implementation of said Order to the extent allowed by the law.

LANDOWNER SIGNATURE \_\_\_\_\_

DATE \_\_\_\_\_

## **TRC's Insurance Policies**



**PHILADELPHIA**  
INSURANCE COMPANIES

A Member of the Tokio Marine Group

One Bala Plaza, Suite 100  
Bala Cynwyd, Pennsylvania 19004  
610.617.7900 Fax: 610.617.7940  
PHLY.com

**Tokio Marine Specialty Insurance Company**

**COMMON POLICY DECLARATIONS**

Policy Number: PPK1358411

**Named Insured and Mailing Address:**

Timberland Resource Consultant  
165 S Fortuna Blvd  
Fortuna, CA 95540-2704

Producer: 198

MAGUIRE INSURANCE AGENCY, INC.  
DBA: Tokio Marine Specialty Insurance Services, Inc.  
One Bala Plaza, Suite 100  
Bala Cynwyd, PA 19004

Policy Period From: 07/01/2015 To: 07/01/2016

at 12:01 A.M. Standard Time at your mailing address shown above.

Business Description: Consulting Forester

IN RETURN FOR THE PAYMENT OF THE PREMIUM, AND SUBJECT TO ALL THE TERMS OF THIS POLICY, WE AGREE WITH YOU TO PROVIDE THE INSURANCE AS STATED IN THIS POLICY.

THIS POLICY CONSISTS OF THE FOLLOWING COVERAGE PARTS FOR WHICH A PREMIUM IS INDICATED. THIS PREMIUM MAY BE SUBJECT TO ADJUSTMENT.

	PREMIUM
Commercial Property Coverage Part	
Commercial General Liability Coverage Part	5,716.00
Commercial Crime Coverage Part	
Commercial Inland Marine Coverage Part	
Commercial Auto Coverage Part	
Businessowners	
Workers Compensation	

**Total**

**\$ 5,716.00**

California Surplus Line Tax

\$ 171.48

California Stamping Fee

\$ 11.43

**FORM (S) AND ENDORSEMENT (S) MADE A PART OF THIS POLICY AT THE TIME OF ISSUE**  
**Refer To Forms Schedule**

\*Omits applicable Forms and Endorsements if shown in specific Coverage Part/Coverage Form Declarations

CPD- PIC (11/14)

Secretary

President and CEO

Tokio Marine Specialty Insurance Company

Form Schedule – Policy

Policy Number: PPK1358411

Forms and Endorsements applying to this Coverage Part and made a part of this policy at time of issue:

Form	Edition	Description
	1212	
CSNotice-1	1014	Making Things Easier
TMSIC-JACKET 1	0213	Commercial Lines Policy Jacket
IL N 177	0912	California Premium Refund Disclosure Notice
PIC-ACF NOTICE 1	0415	Advisory Notice To Policyholders
PIC-TMNOTICE 2	2015	Privacy Policy Notice
CPD-PIC	1114	Common Policy Declarations
Location Schedule	0100	Location Schedule
PI-BELL-1	1109	Bell Endorsement
PI-CME-1	1009	Crisis Management Enhancement Endorsement
IL0017	1198	Common Policy Conditions
IL0021	0908	Nuclear Energy Liability Exclusion Endorsement
IL0270	0912	California Changes - Cancellation And Nonrenewal
TMSIC-SOS-CA	1112	Service of Suit

Tokio Marine Specialty Insurance Company

Locations Schedule

Policy Number: PPK1358411

Premis. No.	Bldg. No.	Address
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0001	0001	165 S Fortuna Blvd Fortuna, CA 95540-2704
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**Tokio Marine Specialty Insurance Company**

**COMMERCIAL GENERAL LIABILITY COVERAGE PART DECLARATIONS**

Policy Number: PPK1358411

Agent # 198

See Supplemental Schedule

**LIMITS OF INSURANCE**

\$	1,000,000	General Aggregate Limit (Other Than Products - Completed Operations)
\$	1,000,000	Products/Completed Operations Aggregate Limit (Any One Person Or Organization)
\$	1,000,000	Personal and Advertising Injury Limit
\$	1,000,000	Each Occurrence Limit
\$	100,000	Rented To You Limit
\$	5,000	Medical Expense Limit (Any One Person)

**FORM OF BUSINESS: CORPORATION**

Business Description: Consulting Forester

Location of All Premises You Own, Rent or Occupy: **SEE SCHEDULE ATTACHED**

**AUDIT PERIOD, ANNUAL, UNLESS OTHERWISE STATED: This policy is not subject to premium audit.**

Classifications	Code No.	Premium Basis	Rates		Advance Premiums		
			Prem./ Ops.	Prod./ Comp. Ops.	Prem./ Ops.	Prod./ Comp. Ops.	
SEE SCHEDULE ATTACHED							
<b>TOTAL PREMIUM FOR THIS COVERAGE PART:</b>					\$	5,716.00	\$

**RETROACTIVE DATE (CG 00-02 ONLY)**

This insurance does not apply to "Bodily Injury", "Property Damage", or "Personal and Advertising Injury" which occurs before the retroactive date, if any, shown below.

Retroactive Date: NONE

**FORM (S) AND ENDORSEMENT (S) APPLICABLE TO THIS COVERAGE PART: Refer To Forms Schedule**

Countersignature Date \_\_\_\_\_

Authorized Representative \_\_\_\_\_

Tokio Marine Specialty Insurance Company

Form Schedule – General Liability

Policy Number: PPK1358411

Forms and Endorsements applying to this Coverage Part and made a part of this policy at time of issue:

Form	Edition	Description
Gen Liab Dec	1004	Commercial General Liability Coverage Part Declaration
Gen Liab Schedule	0100	General Liability Schedule
CG0001	0413	Commercial General Liability Coverage Form
CG2026	0413	Additional Insured - Designated Person Or Organization
CG2146	0798	Abuse Or Molestation Exclusion
CG2147	1207	Employment-Related Practices Exclusion
CG2167	1204	Fungi or Bacteria Exclusion
CG2173	0108	Exclusion of Certified Acts of Terrorism
CG2264	0413	Pesticide or Herbicide Applicator - Limited Pollution
CG2402	1204	Binding Arbitration
CG2404	0509	Waiver of Transfer of Rights of Recovery Against Other California Changes
CG3234	0105	Foresters Coverage Amendment
PI-ACF-001	0415	Foresters Errors And Omissions Liability Coverage Endt
PI-ACF-002	0415	Foresters Errors And Omissions Liability Coverage Endt
PI-MANU-1	0100	CG 20 26 Blanket Additional Insured Wording