

ROCKY MOUNTAIN ARSENAL

ANNUAL COVERS REPORT FOR INTEGRATED COVER SYSTEM 2025

Revision 0

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Shell Oil Company

Prepared by:



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ACRONYMS

ACR	Annual Covers Report
AMA	Army Maintained Areas
FY25	Fiscal Year 2025
FY26	Fiscal Year 2026
ICS	Integrated Cover System
LTCP	Long-Term Care Plan
NRAP	Non-Routine Action Plan
NWS	National Weather Service
O&M	Operations and Maintenance
RCRA	Resource Conservation and Recovery Act
RMA	Rocky Mountain Arsenal
SOP	Standard Operating Procedure



EXECUTIVE SUMMARY

This *2025 Annual Covers Report (ACR) for the Integrated Cover System (ICS)* at the Rocky Mountain Arsenal (RMA) was prepared in accordance with the *RCRA-Equivalent, 2-, and 3-Foot Covers Long-Term Care Plan*, Revision 3 (LTCP) (Navarro 2021a). The purpose of this ACR is to document cover inspection results and maintenance activities performed on the ICS Army Maintained Area (AMA) during Fiscal Year 2025 (FY25) (i.e., October 1, 2024 to September 30, 2025), and to describe plans to improve or sustain cover conditions. Figure 1.0-1 illustrates the location of the ICS AMA within the RMA National Wildlife Refuge.

The ICS was in good condition throughout FY25. Cover deficiencies observed during the reporting period include areas of cover surface drainage interruption, noxious or undesirable weeds, damage to the perimeter fence, and erosion/settlement monument maintenance, all of which are typical for the site and addressed through routine maintenance activities.

Percolation was below the non-routine action trigger level and the compliance standard for all lysimeters.

All cover soil thickness loss measurements were below the non-routine action trigger level and the compliance standard, except at one monument. Monument ER76 had 4.0 inches of soil thickness loss during the fall 2024 Type I inspection. The measurement exceeded the non-routine trigger level of greater than three inches and prompted the preparation of Non-Routine Action Plan (NRAP)-2024-002.

The 2025 Vegetation Performance Assessment was performed on the ICS Resource Conservation and Recovery Act (RCRA)-equivalent covers and on the ICS 2-foot and 3-foot soil covers. Total live vegetation values were well above the minimum compliance standard value for both areas. The two-year average and three-year average of total ground cover were also comfortably above the minimum compliance standard values.

In 2021, 93 acres of the ICS experienced poor vigor and growth by native perennial grasses, as documented in NRAP-2021-005 (Navarro 2021b). Following the 2024 growing season, approximately 25 acres were mowed, and 5.5 acres were over-seeded in October 2024. These areas were primarily focused on the west side of the South Plants 3-Foot Cover Soil. This area continued to be monitored during the growing season of 2025 and there were no areas identified in the original 93 acres that required mowing or seeding.

Routine inspections and maintenance of the ICS AMA will continue throughout Fiscal Year 2026 (FY26) in accordance with the requirements of the LTCP. In addition to routine maintenance activity, the Army intends to replace caulk and reseal the expansion joints of the concrete lined channels. This activity will be discussed in the 2026 ICS ACR.



The ICS met the compliance standards for percolation, cover soil thickness, and vegetation in FY25. No corrective measures are planned for FY26.

Costs incurred performing Operations and Maintenance of the ICS AMA during FY25 equaled \$96,464. The estimated FY26 budget is \$91,153.



1.0 INTRODUCTION AND METHODOLOGY

This *2025 Annual Covers Report (ACR) for the Integrated Cover System (ICS)* at the Rocky Mountain Arsenal (RMA) was prepared in accordance with the *RCRA-Equivalent, 2-, and 3-Foot Covers Long-Term Care Plan, Revision 3 (LTCP)* (Navarro 2021a). The purpose of this ACR is to document cover inspection results and maintenance activities performed on the ICS Army Maintained Area (AMA) during Fiscal Year 2025 (FY25) (i.e., October 1, 2024 to September 30, 2025), and to describe plans to improve or sustain cover conditions.

The ICS is currently in the Interim Operations and Maintenance (O&M) Period defined in Section 1.0 of the LTCP. This report addresses the sixteenth year of Interim O&M for the ICS since construction was completed in early 2010. Figure 1.0-1 illustrates the location of the ICS AMA within the RMA National Wildlife Refuge.

The Resource Conservation and Recovery Act (RCRA)-equivalent, 2-foot, and 3-foot covers and associated non-cover areas within the outside shoulder of the perimeter access road, collectively referred to as the ICS AMA, were inspected, monitored, repaired, and maintained in accordance with the LTCP, Revision 3. The results of inspections and monitoring of vegetation, percolation, and cover soil thickness were used to verify cover performance and to trigger cover maintenance and repair work.

2.0 INSPECTIONS AND MAINTENANCE

Procedures for inspecting the ICS covers and associated features are detailed in Appendix A of the LTCP. Standard Operating Procedure (SOP) 001, *Cover Conditions Inspections* details the method for inspecting the cover surface, stormwater management components, and engineering controls. Likewise, SOP 002, *Cover Vegetation Performance Assessment* provides instructions for collecting vegetation data, and SOP 003, *Percolation Monitoring System Data Collection and Operation* describes the process for monitoring percolation at the lysimeters.

Routine maintenance and repair activities are listed in Table 3.2-1 of the LTCP, while conditions requiring non-routine actions are listed in Table 3.2-2 of the LTCP.

2.1 Cover Inspections

All inspections were performed in accordance with SOP 001 presented in Appendix A of the LTCP. A summary of inspections is provided in Table 2.1-1.

Table 2.1-1: Cover Inspections

Date	Inspection Type	Note
October 2, 2024	Type I with erosion/settlement monuments	Regularly scheduled semiannual inspection.
October 2, 2024	Percolation Monitoring	Regularly scheduled inspection of Shell Cover lysimeters.
November 13, 2024	Percolation Monitoring	This regularly scheduled inspection of all ICS lysimeters was postponed from November 5 due to snowy field conditions.
December 4, 2024	Percolation Monitoring	Regularly scheduled inspection of Shell Cover lysimeters.
January 29, 2024	Percolation Monitoring	This regularly scheduled inspection of Shell Cover lysimeters was postponed from January 8 due to snowy field conditions.
February 5, 2025	Type I	This regularly scheduled quarterly inspection was moved to February due to inclement weather in January.
February 5, 2025	Percolation Monitoring	Regularly scheduled inspection of Shell Cover lysimeters.
March 5, 2025	Percolation Monitoring	Regularly scheduled inspection of Shell Cover lysimeters.
April 8, 2025	Percolation Monitoring	This regularly scheduled inspection of Shell Cover lysimeters was postponed from April 2 due to wet field conditions.
April 9, 2025	Type II	Regularly scheduled semiannual inspection.
May 14, 2025	Percolation Monitoring	This regularly scheduled lysimeter inspection was postponed from May 7 due to wet field conditions.
May 15 through 21, 2025	Cover Perimeter Survey Monument	Five-Year Review inspection.
June 11, 2025	Percolation Monitoring	This regularly scheduled inspection of Shell Cover lysimeters was postponed from June 4 due to wet field conditions.

Date	Inspection Type	Note
July 2, 2025	Type I	Regularly scheduled quarterly inspection/Five-Year Review Inspection performed concurrently.
July 8, 2025	Percolation Monitoring	This regularly scheduled lysimeter inspection was rescheduled due to time limitation on July 2.
August 6, 2025	Percolation Monitoring	Regularly scheduled inspection of Shell Cover lysimeters.
September 3, 2025	Percolation Monitoring	Regularly scheduled lysimeter inspection.
September 16, 2025	Vegetation Assessment	Annual vegetation data collection on the 2-foot and 3-foot covers group.
September 17 & 18, 2025	Vegetation Assessment	Annual vegetation data collection on the ICS RCRA-equivalent covers group.

2.2 Inspection Observations and Repairs

Figure 2.0-1 illustrates the locations of maintenance activities performed on the ICS AMA. Completed inspection forms are provided in Appendix C of this report and documentation of maintenance activities is provided in Appendix D of this report. Summaries of observations and repairs are provided in Table 2.2-1.

Table 2.2-1: ICS Inspection Observations and Repairs

Inspection Item	Observation	Action
Erosion rills, gullies, or sheet erosion	None	N/A
Conditions that could interrupt cover surface drainage (ponding areas, ruts, holes greater than 3" in diameter)	A hole greater than 3" was observed near ER39. (Inspection Form: 10/2/24) A hole greater than 3" was observed and marked with GPS coordinates. (Inspection Form: 4/9/25)	Navarro used a trail camera to monitor the hole for animal activity. No activity was observed. Repaired in October 2024 using existing cover soil near the hole. Backfilled the hole in April 2025.
Excessive animal trails	None	N/A
Widespread burrowing animal holes	None	N/A



Inspection Item	Observation	Action
Extensive linear cracks	None	N/A
Vandalism, or intrusive damage such as unplanned excavation, drilling, grading, damage to engineering or access controls	None	N/A
Bare area or areas of poor growth greater than 100 square feet	None	N/A
Areas of vegetation stress greater than 100 square feet (over grazing, discoloration, pedestalling)	None	N/A
Deep rooted, noxious, or undesirable weedy species	Cheatgrass was observed around Monument ER39 and four other locations. (Inspection Forms: 4/9/25 and 7/2/25)	Cheatgrass was sprayed with herbicide in August 2025.
Excessive litter accumulation	None	N/A
The perimeter fence is damaged	None	In July 2025, a bison accessed the west side of the ICS cover via the west cattleguard. USFWS quickly removed the animal and closed nearby Gate N, with no damage observed on the cover nor fence. Later that month, bison activity created a breach of the perimeter fence at the southeast corner near 7th Avenue; Navarro repaired the split fence and straightened T-posts, with no other damage. In August 2025, Navarro repaired the fence south of the east cattleguard, replacing a T-post and securing the fence fabric; the cover remained unaffected.



Inspection Item	Observation	Action
Debris has collected along the perimeter fence	None	N/A
Obelisks are damaged, not visible, or not legible	None	N/A
Warning signs are not legible from 25 feet	None	N/A
Damage to the Perimeter Access Road such as potholes, washouts, washboard, or burrowing	None	The west ICS perimeter road was graded in November 2024 and August 2025. The entire ICS perimeter road was graded in April 2025. This maintenance is routine and not due to an inspection item.
Impeded drainage or ponding in the channel (siltation/debris present)	None	N/A
Inadequate protective vegetation	None	N/A
Erosion rills or gullies in the grass-lined channel	None	N/A
Cracked or degraded concrete	None	N/A
Expansion joint damage (missing caulk)	Caulk was missing from some of the expansion joints in Channel 11A. (Inspection Form: 10/12/23) Caulk was missing from some of the expansion joints in Channel 6. (Inspection Form: 1/3/24) Caulk was missing from some of the expansion joints in Channel 4. (Inspection Form: 5/1/24) Caulk was missing from some of the expansion joints in Channels 15A and 17. (Inspection Form: 2/5/25)	The missing or degraded caulk in the channels was not addressed during this reporting period. In June 2025, Navarro met with Elite Waterproofing to obtain a cost estimate for replacing all concrete lined caulk joints for ICS, in addition to the ones noted. This work is anticipated to be performed in 2026 and will be discussed in the 2026 ICS ACR.



Inspection Item	Observation	Action
Inhibited drainage from the soil to the concrete-lined channel	None	N/A
Subsidence or undercutting of the concrete-lined channel	None	N/A
Erosion/Settlement Monuments	A rodent hole was present on the north side of ER76, contributing to the monument's soil loss exceeding the Non-Routine Trigger Level of 3 inches. (Inspection Form: 10/2/24)	Repaired the area around the monument in accordance with Non-Routine Action Plan (NRAP)-2024-002 in November 2024.
	Replace damaged Carsonite markers for Monument ER60 and ER85. (Inspection Form: 4/9/25)	Carsonite markers for Monuments ER60 and ER85 were replaced in April 2025.
	Erosion Monument ER60 was missing the monument cap and could not be measured during the April 2025 Type II inspection. (Inspection Form: 4/9/25)	The cap for Monument ER60 was found near the monument and replaced on April 15, 2025. The monument measured 1.5" soil loss. The cap was permanently affixed to the shaft in July 2025.
ICS Cover Perimeter Survey Monument Inspection Form SOP 001-2 (performed every five years)	CPSM-49, CPSM-50, CPSM-51, and CPSM-52 were easily located but the monument was not legible. (Inspection Form: May 2025)	These repairs were not addressed during this reporting period.
ICS Percolation Monitoring System Data Collection and Operation Form SOP 003-1	Lysimeters 004, 005, 006, 007, 011, and 015 would benefit to have the standing water pumped from inside of the manhole. (Inspection Form: 11/3/24) Lysimeters 012, 013, and 014 would benefit to have the standing water pumped from inside of the manhole. (Inspection Form: 5/14/25) Lysimeters 008, 009 and 010 would benefit to have the standing water pumped from	The standing water was pumped from Lysimeters 004, 005, 006, 007, 011, 012, 013, 014, and 015 in June 2025. The other lysimeters were not addressed during this reporting period.

Inspection Item	Observation	Action
	inside of the manhole. (Inspection Forms: 7/8/25 and 9/3/25)	

2.3 Vegetation Management

The maintenance items listed below are focused on routine vegetation management to facilitate effective O&M of the ICS cover. These maintenance items were often observed independently of routinely scheduled inspections due to the timing of seasonal growth. Summaries of vegetation management are provided in Table 2.3-1.

Table 2.3-1: ICS Vegetation Management

Task	Action	Date
Weed Control	Ground clear herbicides Piper EZ® and Oust XP® were broadcast sprayed to working surfaces.	October 2024
Weed Control	Mowed 24.95 acres on the South Plants 3-Foot Cover.	October 2024
Seeding	Over-seeded 5.43 acres on the South Plants 3-Foot Cover.	October 2024
Seeding	Lysimeters 001, 002, and 003 were hand seeded to encourage native grass species' establishment.	November and December 2024
Weed control	Spot sprayed common mullein, thistles, yucca, whitetop, and other prohibited plants using the herbicides Escort XP®, Telar®, and Tordon®.	June 2025
Weed control	Sprayed cheatgrass areas using the herbicide Rejuvra®.	August 2025

2.4 Poor Vigor and Species Diversity

In May of 2021, the Army observed little or no growth of established perennial grasses over approximately 93 acres of the ICS and this issue was first documented in the 2021 ICS ACR (Navarro 2021c). NRAP-2021-005 (Navarro 2021b) was created to document the substandard condition of the 93 acres of vegetation and to propose how the vegetation would be improved. The affected areas were primarily located on the west side of the South Plants 3-Foot Soil Cover but extended east and north into the South Plants and Lime Basins RCRA-Equivalent Covers.

During the 2022 reporting period, 93 acres were mowed, with portions of these areas also drill seeded and treated with herbicide for weed control. In 2023, approximately 37 of those acres received additional maintenance, including spring drill seeding and summer mowing. Following the growing season of 2024, approximately 25 acres were mowed, and approximately 5.5 acres

were drill seeded in October 2024. These areas were primarily located on the west side of the South Plants 3-Foot Cover Soil.

This area continued to be monitored during the growing season of 2025 and there were no areas identified in the original 93 acres that required mowing or seeding.

2.5 Climatological Data

The rain gauge located west of the Lime Basins RCRA-Equivalent Cover, near the Lime Basins Metering Building collects precipitation data for the RMA. The precipitation measured at the Lime Basins gauge during FY25 was 10.39 inches. Precipitation data are provided in Appendix A. A significant rain event, greater than 1.0 inch in 24 hours, occurred on September 23, 2025. A post-storm drive around inspection was conducted on September 24, 2025, and recorded in the project logbook. The formal post-storm inspection was completed in October 2025 and will be included in the 2026 ICS ACR.

Figures 2.5-1 and 2.5-2 illustrate the Rocky Mountain Region's monthly temperature and precipitation values for FY25 as published by the National Oceanic and Atmospheric Administration, National Weather Service (NWS) Forecast Office for Denver/Boulder, Colorado. Climate data reported by the NWS were collected at the Primary Local Climatological Data Site, located at the Denver International Airport. FY25 had near average temperatures and above normal spring precipitation in the Rocky Mountain Region.

3.0 PERCOLATION MONITORING ASSESSMENT

The ICS RCRA-equivalent covers use a network of 15 lysimeters to monitor deep percolation. Percolation is reported in millimeters, which is calculated by dividing the measured percolation volume by the area of the lysimeter pan, or 1,500 square feet (139.35 square meters).

The procedure for monitoring percolation is detailed in LTCP SOP 003, *Percolation Monitoring System Data Collection and Operation*. All lysimeter inspections were performed in accordance with SOP 003 and the inspection documentation is provided in Appendix C.

Quarterly submission of percolation monitoring results for all lysimeters were issued to the regulatory agencies. Each quarterly submittal included monthly measurements, 9-month cumulative totals, and 12-month cumulative totals. Percolation data for FY25 were transmitted in December of 2024 (Navarro 2024b), March (Navarro 2025a), June (Navarro 2025b), and September of 2025 (Navarro 2025c).

The percolation measurements are presented in Table 3.0-1. Table 3.0-2 presents rolling nine-month percolation totals for comparison to the non-routine action trigger level of 1.0 mm in nine months, and Table 3.0-3 presents twelve-month rolling totals for comparison to the compliance standard of 1.3 mm in 12 months.

Table 3.0-1: Monthly Percolation Measurements

Lysimeter No.	Monthly Percolation Measurement (Liters)											
	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25
001	0	0	0	0	0	0	0	0	0	0	0	0
002	0	0	0	0	0	0	0	0	0	0	0	0
003	4	6	Trace	0	0	0	0	0	0	0	0	0
004		1						0		0		1
005		7						Trace		0		2
006		0						0		0		0
007		0						0		Trace		Trace
008		0						Trace		0		0
009		0						0		0		0
010		Trace						0		0		0
011		0						0		0		0
012		0						0		0		3
013		2						Trace		0		1
014		2						Trace		0		2
015		0						0		0		0

Note 1: Lysimeters 004 through 015 are inspected in May, July, September, and November.

Table 3.0-2: Rolling Nine-Month Percolation Totals

Lysimeter No.	Rolling Nine-Month Percolation Total (mm)											
	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25
001	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
002	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
003	0.03	0.08	0.08	0.08	0.08	0.08	0.08	0.08	0.07	0.04	0.00	0.00



Lysimeter No.	Rolling Nine-Month Percolation Total (mm)											
	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25
004	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.00	0.01
005	0.01	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.05	0.05	0.00	0.01
006	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
007	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
009	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
010	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
011	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
012	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
013	0.02	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.01	0.01	0.00	0.02
014	0.01	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.01	0.01	0.00	0.01
015	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.00	0.00	0.00	0.01

Table 3.0-3: Rolling Twelve-Month Percolation Totals

Lysimeter No.	Rolling Twelve-Month Percolation Total (mm)											
	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25
001	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
002	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
003	0.16	0.13	0.10	0.08	0.08	0.08	0.08	0.08	0.08	0.08	0.08	0.07
004	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01
005	0.01	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06
006	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
007	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00



Lysimeter No.	Rolling Twelve-Month Percolation Total (mm)											
	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25
008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
009	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
010	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
011	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
012	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
013	0.03	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04
014	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.02
015	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01

As shown in Tables 3.0-2 and 3.0-3, all ICS lysimeters were below the non-routine action trigger level and compliance standard for the entire reporting period.

4.0 COVER SOIL THICKNESS

The ICS RCRA-equivalent covers and 3-Foot Soil Cover includes a network of 92 erosion/settlement monuments embedded within the cover soil. The monuments are generally positioned on a 500-foot grid, except for the Shell Disposal Trenches RCRA-Equivalent Cover area, where monuments are positioned at locations selected by the regulatory agencies during the design process. Cover soil thickness loss was measured at each of the monuments during the inspections in October of 2024 and April of 2025 in accordance with LTCP SOP 001, *Cover Conditions Inspections*. The measurements for each monument are provided on Table 4.0-1, and inspection documentation is provided in Appendix C.

Monument ER76 exceeded the non-routine action trigger level during the fall 2024 Type I inspection and prompted the preparation of NRAP-2024-002. Measurements are taken on the north side of each monument, where the NRAP notes that soil loss resulted from rodent activity. In November 2024, the cover was repaired around Monument ER76 in accordance with the approved NRAP.

Monument ER60 was observed without its erosion monument cap during the spring 2025 Type II inspection. The disturbance was likely attributed to vegetation management activities conducted in October 2024. On April 15, 2025, Navarro personnel located the displaced cap, reinstalled it on ER60, and documented 1.5 inches of soil cover thickness loss. In July 2025, the cap was permanently secured to the monument shaft with epoxy to prevent future displacement.



Table 4.0-1: Soil Cover Thickness Loss

Monument No.	Oct 2, 2024 Loss (in.)	Apr 9, 2025 Loss (in.)	Monument No.	Oct 2, 2024 Loss (in.)	Apr 9, 2025 Loss (in.)
ER01	1.00	0.25	ER47	2.50	1.75
ER02	1.50	1.00	ER48	1.25	1.50
ER03	0.75	0.00	ER49	1.25	1.25
ER04	2.75	2.75	ER50	1.00	1.00
ER05	1.50	1.00	ER51	1.00	1.00
ER06	2.50	2.50	ER52	0.00	0.25
ER07	0.75	0.00	ER53	0.75	1.00
ER08	2.50	2.00	ER54	0.00	0.00
ER09	1.50	1.50	ER55	1.00	1.00
ER10	1.50	1.50	ER56	0.00	0.00
ER11	1.50	0.75	ER57	0.25	0.25
ER12	1.50	1.25	ER58	1.50	1.25
ER13	1.50	1.00	ER59	1.00	1.25
ER14	1.25	1.00	ER60	1.50	N/A
ER15	0.00	0.00	ER61	0.00	0.00
ER16	2.25	2.00	ER62	0.75	0.25
ER17	0.75	0.25	ER63	2.00	2.75
ER18	0.00	0.00	ER64	1.50	1.50
ER19	0.00	0.00	ER65	1.50	1.50
ER20	1.75	1.25	ER66	2.00	2.50
ER21	0.75	0.50	ER67	0.00	0.00
ER22	1.75	1.50	ER68	1.50	1.25
ER23	1.00	0.50	ER69	1.00	1.00
ER24	0.00	0.00	ER70	0.00	0.00
ER25	1.25	1.00	ER71	1.00	0.75



Monument No.	Oct 2, 2024 Loss (in.)	Apr 9, 2025 Loss (in.)
ER26	0.00	0.00
ER27	1.00	1.00
ER28	1.50	1.25
ER29	1.75	1.50
ER30	2.50	2.00
ER31	3.00	2.50
ER32	0.75	0.50
ER33	1.50	1.25
ER34	2.00	1.75
ER35	2.00	1.50
ER36	2.25	2.00
ER37	2.50	2.25
ER38	2.50	2.50
ER39	1.50	1.00
ER40	1.00	0.75
ER41	2.00	1.50
ER42	1.25	1.00
ER43	1.50	1.50
ER44	2.50	2.25
ER45	1.75	1.25
ER46	2.25	1.75

Monument No.	Oct 2, 2024 Loss (in.)	Apr 9, 2025 Loss (in.)
ER72	2.00	1.75
ER73	1.25	1.50
ER74	0.00	0.00
ER75	0.00	0.00
ER76	4.00	1.50
ER77	0.75	0.00
ER78	1.00	1.00
ER79	0.50	0.00
ER80	1.00	0.75
ER81	1.25	1.25
ER82	1.00	1.25
ER83	0.25	0.00
ER84	2.00	1.75
ER85	0.50	0.25
ER86	0.00	0.00
ER87	0.00	0.00
ER88	1.50	1.00
ER89	1.50	1.50
ER90	1.25	1.25
ER91	1.25	1.00
ER92	0.50	0.00

All measurements were below the compliance standard of 0.5 foot, except for ER76.

5.0 VEGETATION PERFORMANCE

The 2025 Vegetation Performance Assessment was conducted in accordance with LTCP SOP 002, *Cover Vegetation Performance Assessment*. Vegetation data were collected and evaluated independently for each of the two cover groups; the ICS RCRA-equivalent covers group (10



transects sampled between September 17 and 18, 2025), and the 2-foot and 3-foot covers group (5 transects sampled on September 16, 2025). Figures 1 and 2 in Appendix B illustrate the transects that were sampled. The dates on which the assessments were conducted were inside the range specified in LTCP SOP 002.

Results of the ICS RCRA-equivalent covers assessment are summarized on Table 5.0-1 and results of the ICS 2-foot 3-foot cover are shown on Table 5.0-2. Appendix B includes additional tables that provide cover and frequency by species, expanded vegetation performance assessments providing two- and three-year running average comparisons, sample adequacy checks, and raw transect data. These tables meet the reporting requirements set forth by the *Revegetation of the Basin A Soil Cover*, developed during the Basin A dispute resolution process in 1999.

Table 5.0-1: ICS RCRA Vegetation Performance Assessment Summary

Performance Criterion and Evaluation	Annual Value	Was the criterion met?	Is this a compliance criterion?
Allowable Total Absolute Live Vegetation Cover $\geq$ 25%	80.4	Yes	Yes
Two Year Running Average for Total Absolute Ground Cover $\geq$ 50%	95.15	Yes	Yes
Three Year Running Average for Total Absolute Ground Cover $\geq$ 67%	94.7	Yes	Yes
Sample Adequacy $\leq$ 10	0.99	Yes	No
Relative Weed Cover $\leq$ 10%	3.86	Yes - Note 1	No

Note 1: The relative weed cover is less than 10 percent, therefore, subtracting all but 10 percent of the total live vegetation cover fraction that is comprised of weeds does not affect the Total Live Vegetation calculation.

The ICS RCRA-equivalent covers met all three vegetation-related compliance standards (i.e., total absolute live vegetation cover, two-year running average for total absolute ground cover, and three-year running average for total absolute ground cover).

Table 5.0-2: ICS 2-Foot 3-Foot Vegetation Performance Assessment Summary

Performance Criterion and Evaluation	Annual Value	Was the criterion met?	Is this a compliance criterion?
Allowable Total Absolute Live Vegetation Cover $\geq 25\%$	78.0	Yes	No
Two Year Running Average for Total Absolute Ground Cover $\geq 50\%$	97.7	Yes	No
Three Year Running Average for Total Absolute Ground Cover $\geq 67\%$	97.0	Yes	No
Sample Adequacy ≤ 5	0.54	Yes	No
Relative Weed Cover $\leq 10\%$	7.95	Yes - Note 1	No

Note 1: The relative weed cover is less than 10 percent, therefore, subtracting all but 10 percent of the total live vegetation cover fraction that is comprised of weeds does not affect the Total Live Vegetation calculation.

Warm and cool season species were prolific at the time the vegetation assessments were conducted. Relative weed cover was low on both assessments and total absolute ground cover was above 90 percent for ICS RCRA and the ICS 2-foot and 3-foot covers.

There did not appear to be excessive stress due to low soil moisture or biological stressors on the grassland community at the time of the assessment. Insects and other wildlife, such as small rodents, grassland birds and deer were observed in all areas.

6.0 NON-ROUTINE ACTIONS AND O&M CHANGES

6.1 Non-Routine Actions

The implementation of non-routine actions is described in the LTCP. The LTCP provides criteria for non-routine actions, and a mechanism for consultation between the parties and documentation of the consultative outcome. NRAP-2024-002 (Navarro 2024a) was the only NRAP prepared during this reporting period and is described in Section 4.0 of this ACR. The NRAP is provided in Appendix E.

6.2 O&M Changes

There were no O&M Change Notices for ICS prepared during this reporting period.

7.0 CONCLUSIONS AND CORRECTIVE MEASURES

The ICS met the compliance standards for percolation, cover soil thickness, and vegetation in FY25. No corrective measures are planned for Fiscal Year 26 (FY26).

Routine inspections and maintenance of the ICS AMA will continue throughout FY26 in accordance with the requirements of the LTCP. In addition to routine maintenance activity, the Army intends to replace caulk and reseal the expansion joints of the concrete lined channels. This activity will be discussed in the 2026 ICS ACR.

8.0 FY25 COSTS AND FY26 BUDGETS

Costs incurred performing Operations and Maintenance of the ICS AMA during FY25 equaled \$96,464. The estimated FY26 budget is \$91,153.

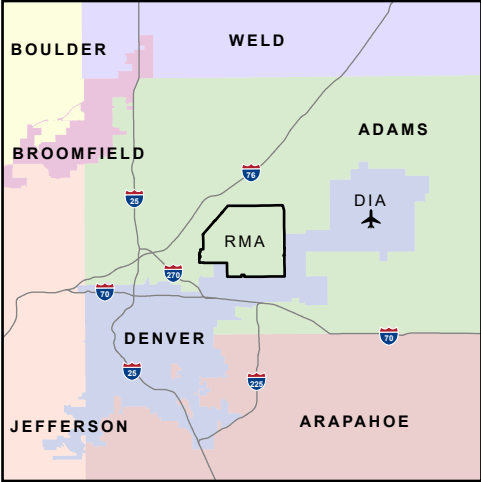
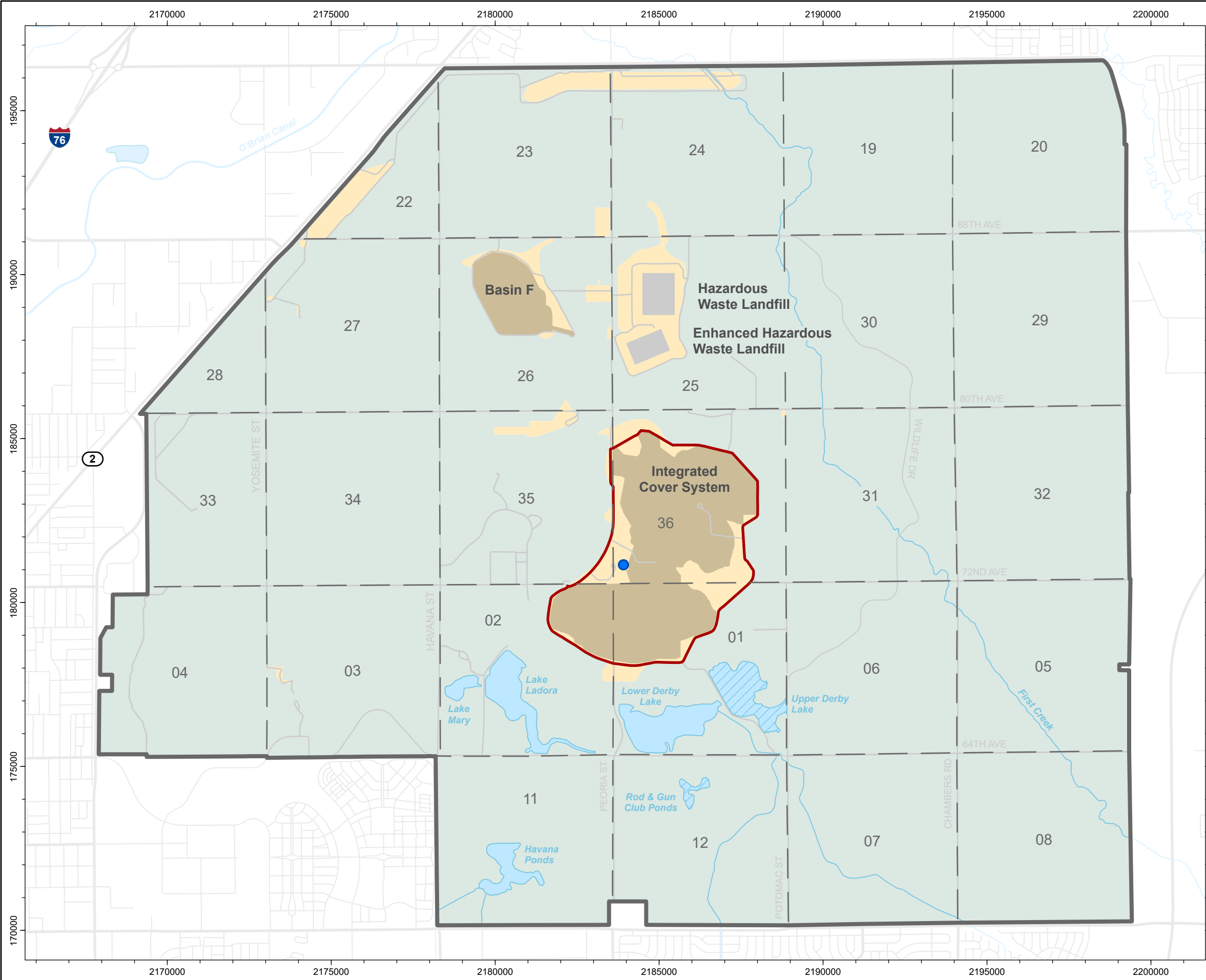
9.0 REFERENCES

Navarro (Navarro Research and Engineering, Inc.)

- | | |
|----------------|---|
| 2025a (Mar 11) | <i>Rocky Mountain Arsenal Integrated Cover System and Basin F Cover Lysimeter Monitoring Data, October 2024 through March 2025.</i> |
| 2025b (Jun 16) | <i>Rocky Mountain Arsenal Integrated Cover System and Basin F Cover Lysimeter Monitoring Data, January 2025 through June 2025.</i> |
| 2025c (Sep 4) | <i>Rocky Mountain Arsenal Integrated Cover System and Basin F Cover Lysimeter Monitoring Data, April 2025 through September 2025.</i> |
| 2024a (Nov 4) | NRAP-2024-002. |
| 2024b (Dec 11) | <i>Rocky Mountain Arsenal Integrated Cover System and Basin F Cover Lysimeter Monitoring Data, July 2024 through December 2024.</i> |
| 2021a (Aug 12) | <i>RCRA-Equivalent, 2-, and 3-Foot Covers Long-Term Care Plan.</i> Revision 3. |
| 2021b (Oct 12) | NRAP-2021-005. |
| 2021c (Nov 17) | <i>Annual Covers Report for Integrated Cover System 2021.</i> Revision 0. |



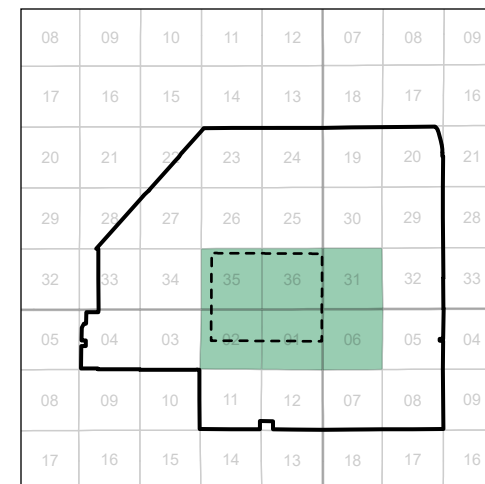
FIGURES



- Rocky Mountain Arsenal National Wildlife Refuge
- U.S. Army Jurisdiction
- Cap
- Cover
- Integrated Cover System
- Army Maintained Area
- PLSS Section Line
- Surface Water
- Seasonal Surface Water
- Road
- Rain Gauge



FIGURE 1.0-1
Rocky Mountain Arsenal
Integrated Cover System
Army Maintained Area



NOTES:

- (1) The outside shoulder of the Integrated Cover System (ICS) Perimeter Access Road defines the U.S. Army Maintained Area (AMA) boundary.
- (2) The ICS Perimeter Access Road was maintained by a motor grader as needed.
- (3) Ground Clear Herbicide was applied to both shoulders of the ICS Perimeter Road at a width of 2-ft or 5-ft depending on the area. Herbicide was not applied to the interior of the roadway.
- (4) Only Erosion/Settlement Monuments that underwent maintenance are labeled.
- (5) ER60 underwent both Erosion/Settlement Monument and Carsonite Marker maintenance.



FIGURE 2.0-1
2025 Integrated Cover System
Maintenance Activities

Figure 2.5-1: Average Monthly Temperature for FY25

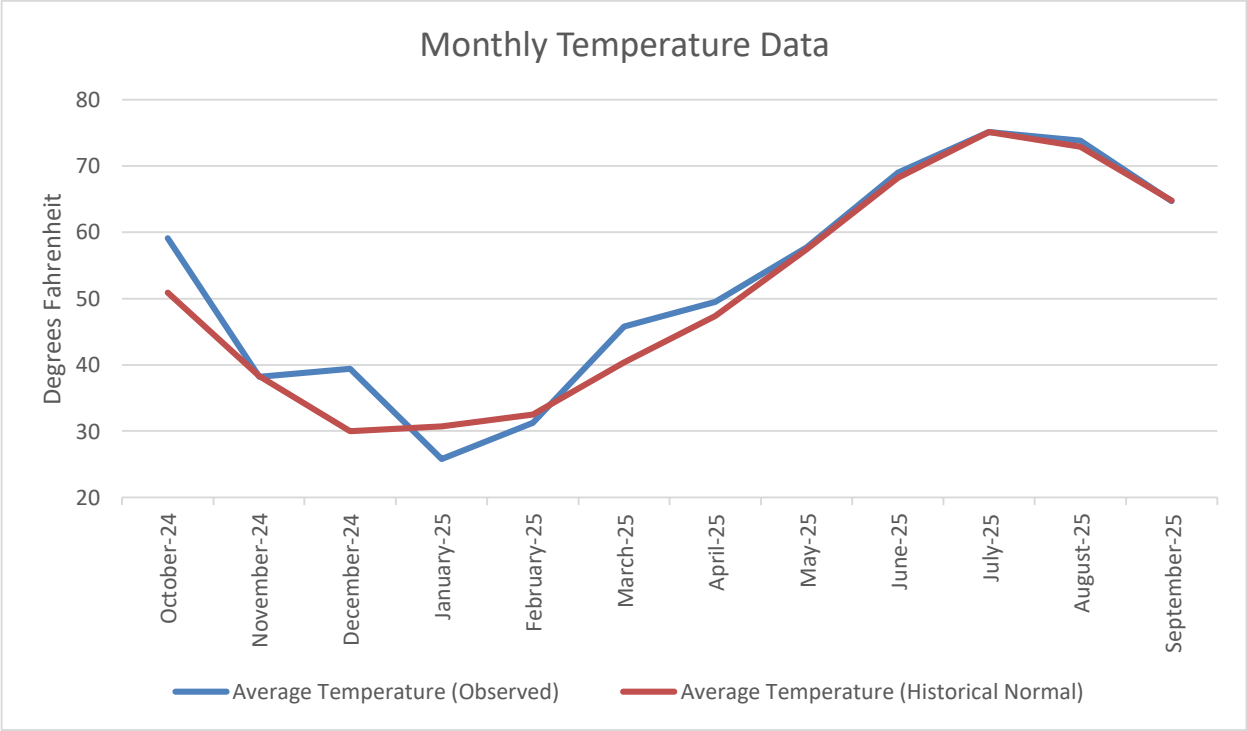
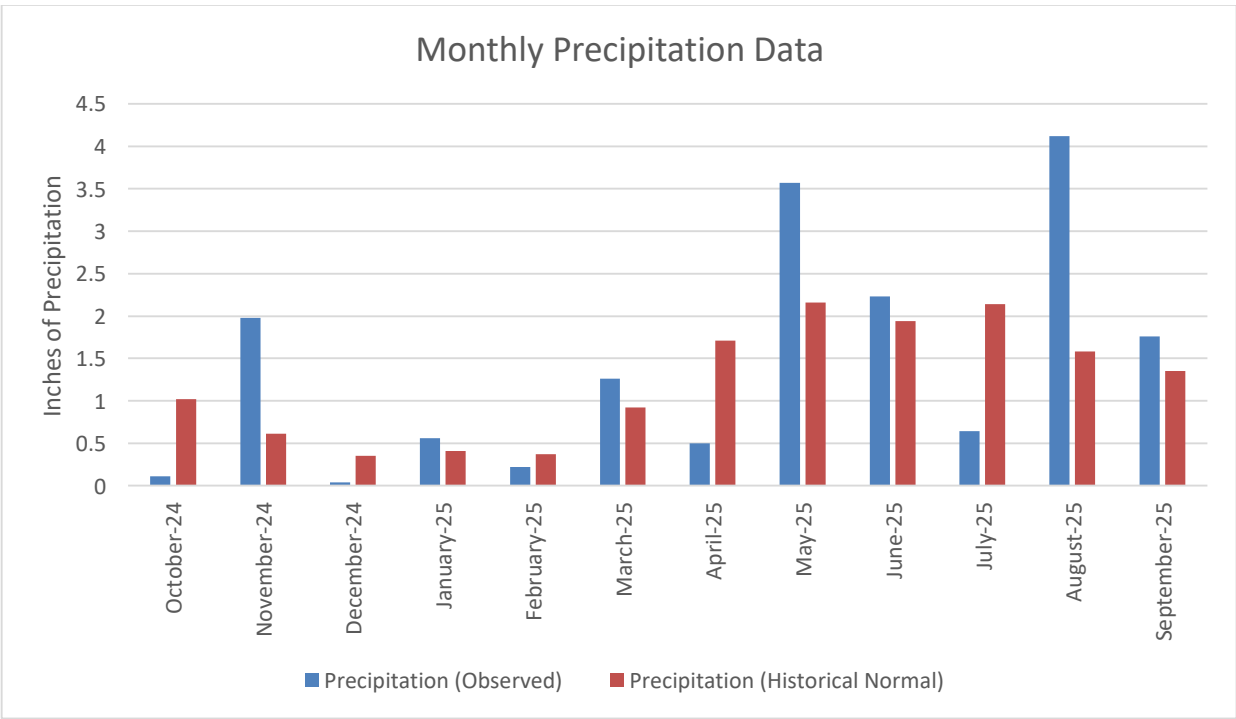


Figure 2.5-2: Average Monthly Precipitation for FY25



APPENDICES

- A Precipitation Data (October 1, 2024 through September 30, 2025)
- B 2025 Vegetation Performance Assessment Documentation
- C Cover Inspection Documentation (October 1, 2024 through September 30, 2025)
- D Maintenance and Repair Documentation (October 1, 2024 through September 30, 2025)
- E Non-Routine Action Plans

APPENDIX A

Precipitation Data

(October 1, 2024 through September 30, 2025)

Appendix A: Precipitation Data (October 1, 2024 through September 30, 2025)

Note 1: This table provides precipitation data for all dates when precipitation was recorded. For dates not shown, there was no recorded precipitation.

Note 2: The yellow highlighted boxes indicate that there was more than one inch of precipitation in a 24-hour period.

Date	Lime Basins Daily Precipitation (in.)
October 18, 2024	0.04
October 31, 2024	0.01
November 3, 2024	0.01
November 4, 2024	0.05
November 6, 2024	0.01
November 8, 2024	0.05
November 9, 2024	0.37
November 10, 2024	0.10
November 25, 2024	0.01
November 27, 2024	0.03
November 28, 2024	0.05
November 29, 2024	0.04
December 10, 2024	0.01
December 25, 2024	0.01
December 26, 2024	0.01
January 1, 2025	0.04
January 7, 2025	0.01
January 8, 2025	0.07
January 21, 2025	0.02
January 24, 2025	0.02
January 26, 2025	0.04
January 27, 2025	0.06
January 30, 2025	0.01
February 13, 2025	0.03
February 14, 2025	0.01
February 16, 2025	0.06
February 21, 2025	0.13
March 3, 2025	0.05
March 4, 2025	0.06
March 6, 2025	0.01
March 14, 2025	0.01
March 18, 2025	0.01
March 29, 2025	0.81
March 30, 2025	0.17
April 1, 2025	0.01
April 2, 2025	0.08
April 3, 2025	0.04
April 4, 2025	0.04
April 5, 2025	0.01
April 14, 2025	0.08

Date	Lime Basins Daily Precipitation (in.)
April 18, 2025	0.14
April 19, 2025	0.14
April 25, 2025	0.03
April 30, 2025	0.01
May 1, 2025	0.13
May 6, 2025	0.46
May 7, 2025	0.52
May 14, 2025	0.12
May 18, 2025	0.01
May 24, 2025	0.09
May 25, 2025	0.15
May 26, 2025	0.84
May 27, 2025	0.01
May 28, 2025	0.07
May 29, 2025	0.17
May 30, 2025	0.01
June 1, 2025	0.39
June 3, 2025	0.29
June 4, 2025	0.03
June 5, 2025	0.37
June 6, 2025	0.03
June 10, 2025	0.05
June 17, 2025	0.41
June 24, 2025	0.23
June 25, 2025	0.35
July 5, 2025	0.01
July 10, 2025	0.01
July 11, 2025	0.05
July 17, 2025	0.07
July 19, 2025	0.08
July 22, 2025	0.02
August 2, 2025	0.01
August 25, 2025	0.02
August 26, 2025	0.14
August 27, 2025	0.06
August 28, 2025	0.26
August 29, 2025	0.01
August 30, 2025	0.10
September 9, 2025	0.04
September 11, 2025	0.02

Appendix A: Precipitation Data (October 1, 2024 through September 30, 2025)

Date	Lime Basins Daily Precipitation (in.)
September 14, 2025	0.01
September 16, 2025	0.17
September 22, 2025	0.13
September 23, 2025	1.27
September 24, 2025	0.16
September 29, 2025	0.02
Total:	10.39

APPENDIX B

2025 Vegetation Performance Assessment Documentation

Table 5.0-1 Cover and Frequency summary for the ICS RCRA-Equivalent at Rocky Mountain Arsenal. Based on data from 10 sampling locations. 2025 data. +/- values equal the standard deviation. Incidental Species present within 1 meter on either side of the data transect, but not quantitatively encountered. 2025						
Species	Mean Cover (%)	Relative Cover (%)	Range of Cover Values (%)	Percent Frequency (%)	Relative Frequency(%)	² Rank
COOL SEASON PERENNIAL GRASSES						
Hesperostipa comata	0.4	.5	0 - 3.00	20.0	4.08	8.0
Pascopyrum smithii	36.4	45.27	2.00 - 71.00	100.0	20.41	1.0
Sub-Total	36.8	45.77				
WARM SEASON PERENNIAL GRASSES						
Bouteloua curtipendula	12.1	15.05	0 - 29.00	90.0	18.37	3.0
Buchloe dactyloides	9.7	12.06	0 - 21.00	90.0	18.37	4.0
Chondrosum gracile	16.2	20.15	0 - 34.00	90.0	18.37	2.0
Sporobolus airoides	2.5	3.11	0 - 19.00	30.0	6.12	5.0
Sub-Total	40.5	50.37				
INTRODUCED PERENNIAL GRASSES						
¹ Bromopsis inermis	0.2	.25	0 - 2.00	10.0	2.04	9.0

Sub-Total	.2	.25				
ANNUAL AND BIENNIAL FORBS						
¹ Bassia sieversiana	1.3	1.62	0 - 10.00	30.0	6.12	7.0
¹ Salsola collina	1.6	1.99	0 - 12.00	30.0	6.12	6.0
Sub-Total	2.9	3.61				

SUM OF SPECIES COVER	80.4	100.0
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³ Total Absolute Mean Vegetation Cover	80.40	+/-2.52
³ Total Absolute Mean Litter Cover	14.40	+/-2.72
³ Total Absolute Mean Bare Soil	5.20	+/-1.04
³ Total Absolute Mean Weedy Cover	3.10	+/-2.99
Total Absolute Ground Cover	94.80	+/-1.04
Relative Weed Cover	3.86	
Relative Allowable Weed Cover	10.0	
Relative Non-Allowable Cover by Weeds	0.00	
Non-Allowable Absolute Weedy Cover	0.00	
Allowable Total Absolute Live Vegetation Cover	80.40	
Mean Number of Species/Sample	4.9	
Mean Species Density/100sq. meters	8.00	+/-1.05

**Incidental Species
i.e < 0.01 Mean Cover**

Achillea lanulosa
Agropyron cristatum
Bassia sieversiana
Bouteloua curtipendula
Bromus tectorum
Chondrosum gracile
Conyza canadensis
Descurainia incana
Helianthus annuus
Hesperostipa comata
Panicum capillare
Salsola collina
Schizachyrium scoparium
Sisymbrium altissimum
Sporobolus airoides
Tragopogon dubius

¹ Weedy Species

² Based on total cover

³ Based on 1st hit data

Table 5.0-2

**Vegetation Performance Assessment
ICS RCRA-Equivalent
Reporting Years 2023, 2024, 2025**

2025

Reporting Year: 2023

Species	Mean Cover (%)	Relative Cover (%)	Range of Cover Values (%)	Percent Frequency (%)	Relative Frequency(%)	² Rank
COOL SEASON PERENNIAL GRASSES						
Hesperostipa comata	1.40	1.66	0 - 8.00	40.00	4.55	10
Pascopyrum smithii	19.70	23.31	2.00 - 47.00	100.00	11.36	2
Sub-Total	21.10	24.97				
WARM SEASON PERENNIAL GRASSES						
Bouteloua curtipendula	11.20	13.25	0 - 27.00	90.00	10.23	3
Buchloe dactyloides	7.40	8.76	0 - 15.00	90.00	10.23	5
Chondrosum gracile	22.80	26.98	13.00 - 32.00	100.00	11.36	1
Panicum virgatum	0.10	.12	0 - 1.00	10.00	1.14	14
Schizachyrium scoparium	0.90	1.07	0 - 9.00	10.00	1.14	11
Sporobolus airoides	1.60	1.89	0 - 7.00	50.00	5.68	9
Sporobolus cryptandrus	1.80	2.13	0 - 5.00	60.00	6.82	8
Sub-Total	45.80	54.20				

ANNUAL GRASSES						
Eragrostis cilianensis	0.30	.36	0 - 1.00	30.00	3.41	13
Panicum capillare	4.90	5.80	0 - 17.00	80.00	9.09	6
Sub-Total	5.20	6.16				

ANNUAL AND BIENNIAL FORBS						
¹ Bassia sieversiana	9.30	11.01	2.00 - 23.00	100.00	11.36	4
Helianthus annuus	0.10	.12	0 - 1.00	10.00	1.14	14
¹ Melilotus officinale	0.80	.95	0 - 5.00	40.00	4.55	12
¹ Salsola collina	2.20	2.60	0 - 11.00	70.00	7.95	7
Sub-Total	12.40	14.68				

SUM OF SPECIES COVER	84.50	100.0				
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CRITERIA ASSESSMENT						
Total Absolute Cover	93.80					
Allowable Total Absolute Live Vegetation Cover 2023	80.65					

Reporting Year: 2024

Species	Mean Cover (%)	Relative Cover (%)	Range of Cover	Percent Frequency	Relative Frequency(%)	² Rank
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			Values (%)	(%)		
COOL SEASON PERENNIAL GRASSES						
Hesperostipa comata	7.60	9.90	0 - 32.00	70.00	11.48	4
Pascopyrum smithii	33.20	43.23	5.00 - 66.00	100.00	16.39	1
Sub-Total	40.80	53.13				
WARM SEASON PERENNIAL GRASSES						
Bouteloua curtipendula	14.50	18.88	0 - 38.00	90.00	14.75	2
Buchloe dactyloides	5.00	6.51	0 - 13.00	90.00	14.75	5
Chondrosum gracile	10.00	13.02	0 - 27.00	90.00	14.75	3
Sporobolus airoides	1.30	1.69	0 - 7.00	40.00	6.56	8
Sub-Total	30.80	40.10				
ANNUAL AND BIENNIAL FORBS						
¹ Bassia sieversiana	2.80	3.65	0 - 8.00	90.00	14.75	6
Conyza canadensis	0.60	.78	0 - 5.00	20.00	3.28	9
¹ Melilotus officinale	0.20	.26	0 - 2.00	10.00	1.64	10
¹ Salsola collina	1.60	2.08	0 - 16.00	10.00	1.64	7
Sub-Total	5.20	6.77				
SUM OF SPECIES COVER						
	76.80	100.0				
CRITERIA ASSESSMENT						

Total Absolute Cover	95.50
Allowable Total Absolute Live Vegetation Cover 2024	76.80

Reporting Year: 2025

Species	Mean Cover (%)	Relative Cover (%)	Range of Cover Values (%)	Percent Frequency (%)	Relative Frequency(%)	² Rank
COOL SEASON PERENNIAL GRASSES						
Hesperostipa comata	0.40	.50	0 - 3.00	20.00	4.08	8
Pascopyrum smithii	36.40	45.27	2.00 - 71.00	100.00	20.41	1
Sub-Total	36.80	45.77				
WARM SEASON PERENNIAL GRASSES						
Bouteloua curtipendula	12.10	15.05	0 - 29.00	90.00	18.37	3
Buchloe dactyloides	9.70	12.06	0 - 21.00	90.00	18.37	4
Chondrosum gracile	16.20	20.15	0 - 34.00	90.00	18.37	2
Sporobolus airoides	2.50	3.11	0 - 19.00	30.00	6.12	5
Sub-Total	40.50	50.37				
INTRODUCED PERENNIAL GRASSES						
¹ Bromopsis inermis	0.20	.25	0 - 2.00	10.00	2.04	9
Sub-Total	0.20	0.25				

ANNUAL AND BIENNIAL FORBS

¹ Bassia sieversiana	1.30	1.62	0 - 10.00	30.00	6.12	7
¹ Salsola collina	1.60	1.99	0 - 12.00	30.00	6.12	6
Sub-Total	2.90	3.61				

SUM OF SPECIES COVER	80.40	100.0				
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CRITERIA ASSESSMENT

Total Absolute Cover	94.80					
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Allowable Total Absolute Live Vegetation Cover 2025	80.40					
--	-------	--	--	--	--	--

Two year running average for Total Absolute Cover	95.15					
--	-------	--	--	--	--	--

Three year running average for Total Absolute Cover	94.7					
--	------	--	--	--	--	--

¹ Weedy Species

² Based on total cover

³ Based on 1st hit data

Table 5.0-3

Sample Adequacy Check

2025

ICS RCRA-Equivalent

Year : 2025

Transect	Hits
----------	------

02	: 71
----	------

09	: 76
----	------

14	: 77
----	------

19	: 77
----	------

20	: 87
----	------

24	: 86
----	------

38	: 87
----	------

55	: 81
----	------

56	: 76
----	------

57	: 86
----	------

Sample Adequacy = 0.99

(Mean value: 80.4, Sample Variance: 5.78, One Tailed Value: 1.383)

**Table 5.0-4 - ICS RCRA-Equivalent Cover
Raw Data Report**

Sampled by: Kimberly Hoffman

Sample Date(s): 9/18/2025

1 - Only plant species that were hit or observed along the transect are recorded in this table.

Blank boxes indicate the species was not present on the transect.

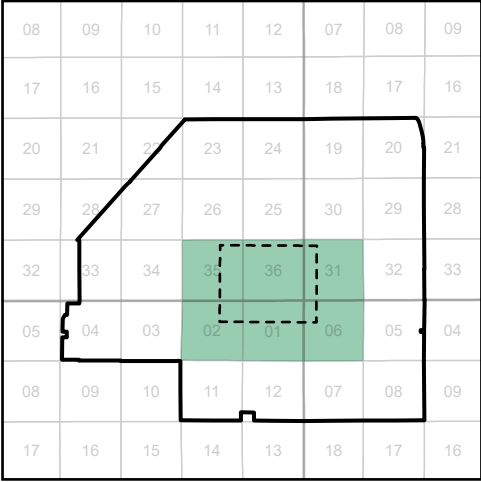
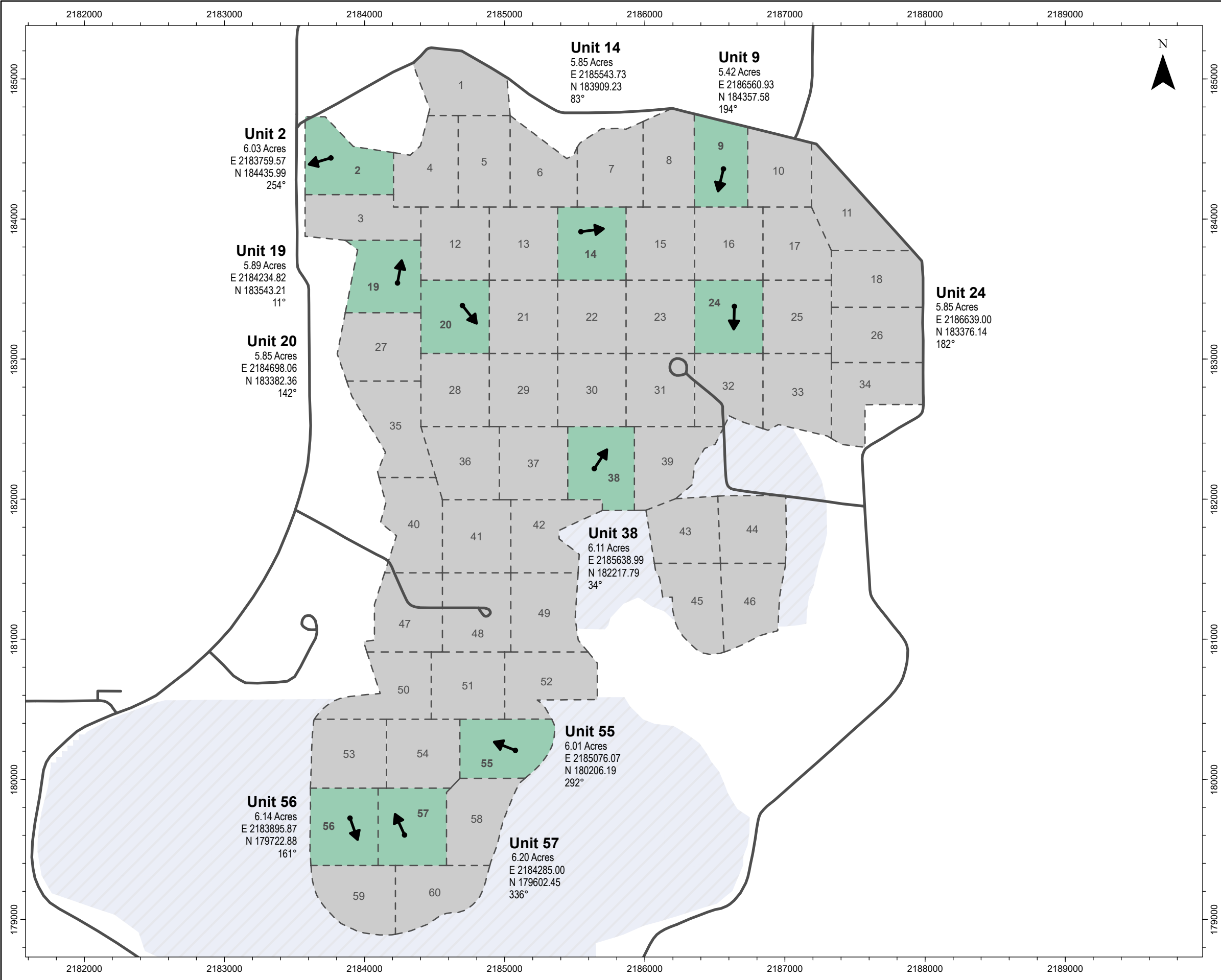
2 - Species with cover values of 0.1 were species observed within the 100 meter zone associated with each transect, but not recorded in the quantitative data collection for each transect.

3 - # of species/100sq meter zone

SPECIES/Other	Transects									
	02	09	14	19	20	24	38	55	56	57
BARE SOIL	4.0	6.0	8.0	6.0	4.0	9.0	4.0	7.0	2.0	2.0
LITTER	25.0	18.0	15.0	17.0	9.0	5.0	9.0	12.0	22.0	12.0
ACHILLEA LANULOSA					0.1					
AGROPYRON CRISTATUM			0.1							
BASSIA SIEVERSIANA			0.1	1.0	2.0		0.1	0.1	10.0	0.1
BOUTELOUA CURTIPENDULA	0.1	9.0	12.0	1.0	11.0	29.0	11.0	10.0	18.0	20.0
BROMOPSIS INERMIS							2.0			
BROMUS TECTORUM						0.1				0.1
BUCHLOE DACTYLOIDES		3.0	1.0	5.0	14.0	20.0	21.0	11.0	5.0	17.0
CHONDROSUM GRACILE	0.1	11.0	8.0	16.0	30.0	34.0	15.0	22.0	12.0	14.0
CONYZA CANADENSIS							0.1			
DESCURAINIA INCANA						0.1			0.1	
HELIANTHUS ANNUUS							0.1			
HESPEROSTIPA COMATA		0.1	0.1		1.0	0.1	3.0			0.1
PANICUM CAPILLARE						0.1				
PASCOPYRUM SMITHII	71.0	53.0	56.0	54.0	21.0	2.0	15.0	38.0	19.0	35.0
SALSOLA COLLINA			0.1	0.1	3.0	0.1	1.0	0.1	12.0	0.1
SCHIZACHYRIUM SCOPARIUM							0.1			
SISYMBRIUM ALTISSIMUM									0.1	0.1
SPOROBOLUS AIROIDES	0.1	0.1		0.1	5.0	1.0	19.0			0.1
TRAGOPOGON DUBIUS				0.1	0.1					
Total Hits plus Incidental Species:	100.3	100.2	100.4	100.3	100.2	100.5	100.4	100.2	100.2	100.6

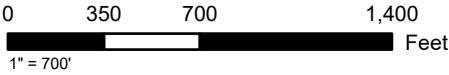
Species Density:	4	6	8	8	10	10	12	6	8	10
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³ Sample Mean: 8.2, Variance: 2.39



NOTE: (1) Sampled units and transect angles were assigned using a random number generator. **(2)** Transect starting locations were assigned using the "Create Random Points" data management tool in ArcGIS Pro within 50 meters of the unit boundary.

- Randomized Sampled Unit
- Non-Sampled Unit
- 2-ft and 3-ft Soil Covers
- Road
- 50-m Transect
- Transect Starting Location
- Unit #
Acreage
Easting
Northing
Bearing



APPENDIX B | FIGURE 1
ICS RCRA-Equivalent Cover
2025 Random 50-Meter Transect
Survey Locations



ICS
Unit 2



ICS
Unit 9



ICS
Unit 14

ICS
Unit 19



ICS
Unit 20





ICS
Unit 24



ICS
Unit 38



ICS
Unit 55



ICS
Unit 56

ICS
Unit 57



Table 5.0-5

Cover and Frequency summary for the 2 Foot and 3 Foot at Rocky Mountain Arsenal. Based on data from 5 sampling locations. 2025 data. +/- values equal the standard deviation. Incidental Species present within 1 meter on either side of the data transect, but not quantitatively encountered.

2025

Species	Mean Cover (%)	Relative Cover (%)	Range of Cover Values (%)	Percent Frequency (%)	Relative Frequency(%)	¹ Rank
COOL SEASON PERENNIAL GRASSES						
Hesperostipa comata	3.8	4.87	0 - 13.00	40.0	8.33	4.0
Pascopyrum smithii	58.2	74.62	41.00 - 72.00	100.0	20.83	1.0
Sub-Total	62.0	79.49				
WARM SEASON PERENNIAL GRASSES						
Bouteloua curtipendula	1.8	2.31	0 - 6.00	60.0	12.5	6.0
Buchloe dactyloides	1.6	2.05	0 - 5.00	40.0	8.33	7.0
Chondrosum gracile	4.4	5.64	0 - 8.00	80.0	16.67	3.0
Sporobolus airoides	2.0	2.56	0 - 6.00	40.0	8.33	5.0
Sub-Total	9.8	12.56				
INTRODUCED PERENNIAL GRASSES						
¹ Bromopsis inermis	0.4	.51	0 - 2.00	20.0	4.17	9.0

Sub-Total	.4	.51				
ANNUAL AND BIENNIAL FORBS						
¹ Bassia sieversiana	1.0	1.28	0 - 4.00	40.0	8.33	8.0
¹ Salsola collina	4.6	5.9	0 - 17.00	40.0	8.33	2.0
¹ Sisymbrium altissimum	0.2	.26	0 - 1.00	20.0	4.17	10.0
Sub-Total	5.8	7.44				
SUM OF SPECIES COVER	78.0	100.0				
³ Total Absolute Mean Vegetation Cover	78.00	+/- 2.56			Incidental Species	
³ Total Absolute Mean Litter Cover	19.80	+/- 2.75			i.e < 0.01 Mean Cover	
³ Total Absolute Mean Bare Soil	2.20	+/- 1.32			Artemisia ludoviciana	
³ Total Absolute Mean Weedy Cover	6.20	+/- 6.35			Bassia sieversiana	
Total Absolute Ground Cover	97.80	+/- 1.32			Bouteloua curtipendula	
					Bromus tectorum	
Relative Weed Cover	7.95				Buchloe dactyloides	
Relative Allowable Weed Cover	10.0				Chenopodium album	
Relative Non-Allowable Cover by Weeds	0.00				Chondrosum gracile	
Non-Allowable Absolute Weedy Cover	0.00				Descurainia incana	
Allowable Total Absolute Live Vegetation Cover	78.00				Salsola collina	
					Schizachyrium	
Mean Number of Species/Sample	4.8				scoparium	
Mean Species Density/100sq. meters	7.00	+/- 1.90			Tragopogon dubius	

¹ Weedy Species

² Based on total cover

³ Based on 1st hit data

Table 5.0-6

Vegetation Performance Assessment
2 Foot and 3 Foot
Reporting Years 2023, 2024, 2025

2025

Reporting Year: 2023

Species	Mean Cover (%)	Relative Cover (%)	Range of Cover Values (%)	Percent Frequency (%)	Relative Frequency(%)	² Rank
COOL SEASON PERENNIAL GRASSES						
Hesperostipa comata	5.20	6.18	0 - 23.00	60.00	6.82	5
Pascopyrum smithii	25.20	29.93	0 - 54.00	80.00	9.09	1
Sub-Total	30.40	36.11				
WARM SEASON PERENNIAL GRASSES						
Bouteloua curtipendula	4.60	5.46	1.00 - 10.00	100.00	11.36	6
Buchloe dactyloides	1.60	1.90	0 - 5.00	60.00	6.82	9
Chondrosum gracile	10.40	12.35	1.00 - 20.00	100.00	11.36	3
Schizachyrium scoparium	0.60	.71	0 - 3.00	20.00	2.27	10
Sporobolus airoides	3.00	3.56	0 - 14.00	40.00	4.55	7
Sporobolus cryptandrus	10.40	12.35	0 - 38.00	80.00	9.09	3
Sub-Total	30.60	36.33				

ANNUAL GRASSES

Panicum capillare	6.60	7.84	0 - 13.00	80.00	9.09	4
Sub-Total	6.60	7.84				

ANNUAL AND BIENNIAL FORBS

¹ Bassia sieversiana	2.60	3.09	0 - 7.00	80.00	9.09	8
Descurainia incana	0.40	.48	0 - 1.00	40.00	4.55	11
Helianthus annuus	0.20	.24	0 - 1.00	20.00	2.27	12
Machaeranthera tanacetifolia	0.20	.24	0 - 1.00	20.00	2.27	12
¹ Salsola collina	12.60	14.96	0 - 50.00	40.00	4.55	2
Solanum rostratum	0.20	.24	0 - 1.00	20.00	2.27	12
Tragopogon dubius	0.20	.24	0 - 1.00	20.00	2.27	12
Ximenesia encelioides	0.20	.24	0 - 1.00	20.00	2.27	12
Sub-Total	16.60	19.73				

SUM OF SPECIES COVER	84.20	100.0
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CRITERIA ASSESSMENT

Total Absolute Cover	95.60
Allowable Total Absolute Live Vegetation Cover 2023	77.42

Reporting Year: 2024

Species	Mean Cover (%)	Relative Cover (%)	Range of Cover Values (%)	Percent Frequency (%)	Relative Frequency(%)	² Rank
COOL SEASON PERENNIAL GRASSES						
Hesperostipa comata	15.80	18.33	4.00 - 37.00	100.00	14.29	2
Pascopyrum smithii	45.20	52.44	16.00 - 76.00	100.00	14.29	1
Sub-Total	61.00	70.77				
WARM SEASON PERENNIAL GRASSES						
Bouteloua curtipendula	8.60	9.98	0 - 24.00	60.00	8.57	3
Buchloe dactyloides	4.00	4.64	0 - 8.00	80.00	11.43	5
Chondrosum gracile	5.60	6.50	0 - 13.00	80.00	11.43	4
Panicum virgatum	2.60	3.02	0 - 12.00	40.00	5.71	6
Schizachyrium scoparium	0.40	.46	0 - 2.00	20.00	2.86	10
Sporobolus airoides	0.80	.93	0 - 3.00	40.00	5.71	8
Sub-Total	22.00	25.53				
ANNUAL AND BIENNIAL FORBS						
¹ Bassia sieversiana	0.60	.70	0 - 1.00	60.00	8.57	9
Helianthus annuus	0.20	.23	0 - 1.00	20.00	2.86	11
¹ Salsola collina	2.40	2.78	1.00 - 5.00	100.00	14.29	7
Sub-Total	3.20	3.71				

SUM OF SPECIES COVER	86.20	100.0
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CRITERIA ASSESSMENT

Total Absolute Cover	97.60
Allowable Total Absolute Live Vegetation Cover 2024	86.20

Reporting Year: 2025

Species	Mean Cover (%)	Relative Cover (%)	Range of Cover Values (%)	Percent Frequency (%)	Relative Frequency(%)	² Rank
COOL SEASON PERENNIAL GRASSES						
Hesperostipa comata	3.80	4.87	0 - 13.00	40.00	8.33	4
Pascopyrum smithii	58.20	74.62	41.00 - 72.00	100.00	20.83	1
Sub-Total	62.00	79.49				
WARM SEASON PERENNIAL GRASSES						
Bouteloua curtipendula	1.80	2.31	0 - 6.00	60.00	12.50	6
Buchloe dactyloides	1.60	2.05	0 - 5.00	40.00	8.33	7
Chondrosum gracile	4.40	5.64	0 - 8.00	80.00	16.67	3
Sporobolus airoides	2.00	2.56	0 - 6.00	40.00	8.33	5

Sub-Total	9.80	12.56				
INTRODUCED PERENNIAL GRASSES						
¹ Bromopsis inermis	0.40	.51	0 - 2.00	20.00	4.17	9
Sub-Total	0.40	0.51				
ANNUAL AND BIENNIAL FORBS						
¹ Bassia sieversiana	1.00	1.28	0 - 4.00	40.00	8.33	8
¹ Salsola collina	4.60	5.90	0 - 17.00	40.00	8.33	2
¹ Sisymbrium altissimum	0.20	.26	0 - 1.00	20.00	4.17	10
Sub-Total	5.80	7.44				

SUM OF SPECIES COVER	78.00	100.0				
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CRITERIA ASSESSMENT

Total Absolute Cover	97.80
Allowable Total Absolute Live Vegetation Cover 2025	78.00

Two year running average for Total Absolute Cover	97.7
Three year running average for Total Absolute Cover	97

¹ Weedy Species

² Based on total cover

³ Based on 1st hit data

Table 5.0-7

Sample Adequacy Check

2025

2 Foot and 3 Foot

Year : 2025

Transect	Hits
-----------------	-------------

100	: 76
------------	-------------

111	: 83
------------	-------------

114	: 79
------------	-------------

117	: 73
------------	-------------

118	: 79
------------	-------------

Sample Adequacy = 0.54

(Mean value: 78, Sample Variance: 3.74, One Tailed Value: 1.533)

**Table 5.0-8 - 2 Foot and 3 Foot Cover
Raw Data Report**

Sampled by: Kimberly Hoffman

Sample Date(s): 9/18/2025

1 - Only plant species that were hit or observed along the transect are recorded in this table.

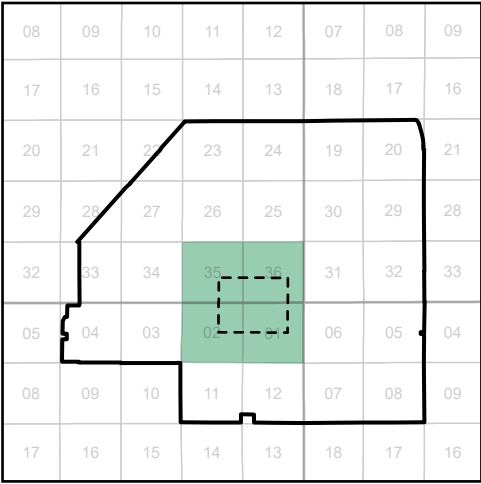
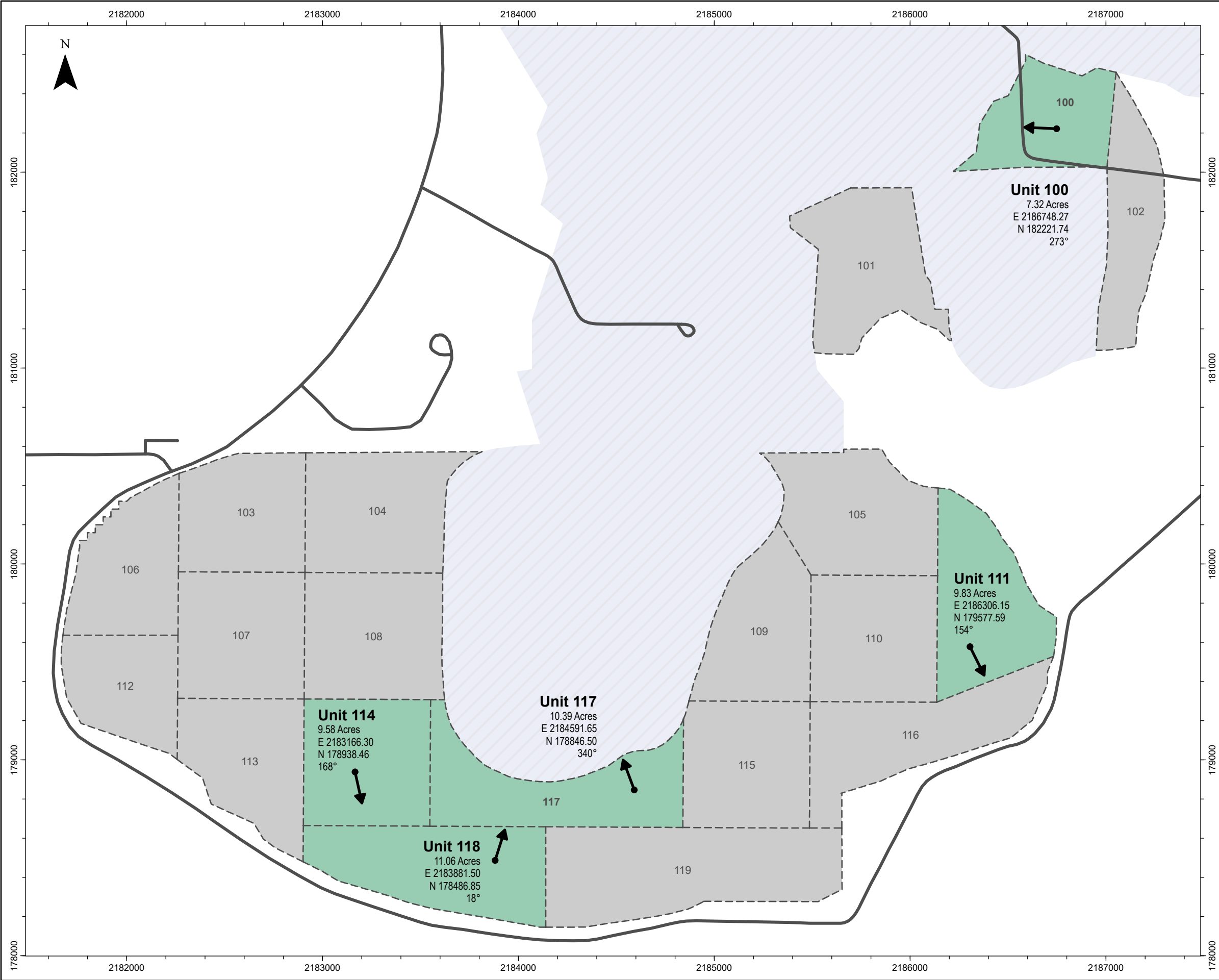
Blank boxes indicate the species was not present on the transect.

2 - Species with cover values of 0.1 were species observed within the 100 meter zone associated with each transect, but not recorded in the quantitative data collection for each transect.

3 - # of species/100sq meter zone

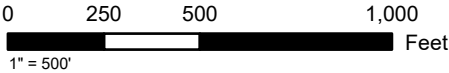
SPECIES/Other	Transects				
	100	111	114	117	118
BARE SOIL		1.0	5.0	3.0	2.0
LITTER	24.0	16.0	16.0	24.0	19.0
ARTEMISIA LUDOVICIANA			0.1		
BASSIA SIEVERSIANA	1.0	0.1	4.0		
BOUTELOUA CURTIPENDULA	1.0	0.1	2.0	6.0	
BROMOPSIS INERMIS		2.0			
BROMUS TECTORUM			0.1		
BUCHLOE DACTYLOIDES	3.0			5.0	0.1
CHENOPODIUM ALBUM			0.1		
CHONDROSUM GRACILE	8.0	0.1	2.0	5.0	7.0
DESCURAINIA INCANA		0.1		0.1	
HESPEROSTIPA COMATA		13.0	6.0		
PASCOPYRUM SMITHII	53.0	68.0	41.0	57.0	72.0
SALSOLA COLLINA	6.0		17.0		0.1
SCHIZACHYRIUM SCOPARIUM					0.1
SISYMBRIUM ALTISSIMUM			1.0		
SPOROBOLUS AIROIDES	4.0		6.0		
TRAGOPOGON DUBIUS		0.1	0.1		0.1
Total Hits plus Incidental Species:	100.0	100.5	100.4	100.1	100.4
Species Density:	7	8	12	5	6

³ Sample Mean: 7.6, Variance: 2.7



NOTE: (1) Sampled units and transect angles were assigned using a random number generator. **(2)** Transect starting locations were assigned using the "Create Random Points" data management tool in ArcGIS Pro within 50 meters of the unit boundary.

- Randomized Sampled Unit
- Non-Sampled Unit
- ICS RCRA-Equivalent Cover
- Road
- 50-m Transect
- Transect Starting Location
- Unit #
Acreage
Easting
Northing
Bearing



APPENDIX B | FIGURE 2
2-Foot and 3-Foot Soil Covers
2025 Random 50-Meter Transect
Survey Locations





2-ft/3-ft
Unit 111



2-ft/3-ft
Unit 114



2-ft/3-ft
Unit 117



2-ft/3-ft
Unit 118

APPENDIX C

Cover Inspection Documentation

(October 1, 2024 through September 30, 2025)

Form SOP 001-1 ICS Inspection Form

Inspector's Names: M. Jones, K. Hoffman, V. Stewart, D. Connolly						Inspection Date(s): 10/2/24					
Inspection Type: ☒ Type I ☐ Type II ☐ Post-Storm											
Drive-around Post-Storm Inspection Date (taken from Logbook): N/A <i>Note: Post-storm event inspection items are indicated with a * next to the Inspection Item number.</i>								Date(s) of Significant Storm Event: N/A			
								Total Precipitation (in): N/A			
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, calm winds, warm											
Attachments: ☒ Photographs ☐ Figures ☐ Other											
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)			
	Y	N	N/A	Y	N	N/A					
1.0 Surface Conditions											
1.1* Erosion rills, gullies, or sheet erosion	☐	☒	☐	☐	☐	☒	none				
1.2* Conditions that could interrupt cover surface drainage (ponding areas, ruts, hole greater than 3" in diameter)	☒	☐	☐	☐	☒	☐	Note 1.	Repaired October 2024.			
1.3 Excessive animal trails	☐	☒	☐	☐	☐	☒	none				
1.4 Widespread burrowing animal holes	☐	☒	☐	☐	☐	☒	none				
1.5* Extensive linear cracks	☐	☒	☐	☐	☐	☒	none				
1.6 Vandalism, or intrusive damage such as unplanned excavation, drilling, grading, damage to engineering or access controls	☐	☒	☐	☐	☐	☒	none				

Form SOP 001-1
ICS Inspection Form

Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
2.0 Vegetative Cover								
2.1 Bare area or areas of poor growth greater than 100 square feet	☐	☒	☐	☐	☐	☒	none	
2.2 Areas of vegetation stress greater than 100 square feet (over grazing, discoloration, pedestalling)	☐	☒	☐	☐	☐	☒	none	
2.3 Deep rooted, noxious or undesirable weedy species	☐	☒	☐	☐	☐	☒	none	
2.4 Excessive litter accumulation	☐	☒	☐	☐	☐	☒	none	
3.0 Engineering and Access Controls								
3.1 The perimeter fence is damaged	☐	☒	☐	☐	☐	☒	none	
3.2 Debris has collected along the perimeter fence	☐	☒	☐	☐	☐	☒	none	
3.3 Obelisks are damaged, not visible, or not legible	☐	☒	☐	☐	☐	☒	none	
3.4 Warning signs are not legible from 25 feet	☐	☒	☐	☐	☐	☒	none	
3.5* Damage to the Perimeter Access Road such as potholes, washouts, washboard, or burrowing	☐	☒	☐	☐	☐	☒	none	

Form SOP 001-1
ICS Inspection Form

4.0 Surface Drainage Controls: <i>Were the following conditions observed during the inspection of the stormwater drainage controls? Check all that apply.</i>																									
Inspection Item	Channel Number																								
	1	2	3	4	5	6	7	8	9	10	11	11A	12	13	14	15	15A	16	17	18	19	20	21	22	23
4.1* Impeded drainage or ponding in the channel (siltation/debris present)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
4.2* Inadequate protective vegetation	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
4.3* Erosion rills or gullies in the grass-lined channel	☐	☐	☐			☐	☐	☐	☐	☐			☐		☐	☐		☐		☐	☐	☐	☐		☐
4.4* Cracked or degraded concrete				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	
4.5* Expansion joint damage (missing caulk)				☒	☐	☒					☐	☒	☐	☐		☐	☐	☐	☐	☐				☐	
4.6* Inhibited drainage from the soil to the concrete-lined channel				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	
4.7* Subsidence or undercutting of the concrete-lined channel				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	

Form SOP 001-1
ICS Inspection Form

5.0 Erosion/Settlement Monuments: <i>Inspect monuments and record the soil thickness loss, if any. Perform during spring Type II and fall Type I inspections.</i>																			
Inspection Item	ER01	ER02	ER03	ER04	ER05	ER06	ER07	ER08	ER09	ER10	ER11	ER12	ER13	ER14	ER15	ER16	ER17	ER18	ER19
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)	1	1.5	0.75	2.75	1.5	2.5	0.75	2.5	1.5	1.5	1.5	1.5	1.5	1.25	0	2.25	0.75	0	0
Inspection Item	ER20	ER21	ER22	ER23	ER24	ER25	ER26	ER27	ER28	ER29	ER30	ER31	ER32	ER33	ER34	ER35	ER36	ER37	ER38
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)	1.75	0.75	1.75	1	0	1.25	0	1	1.5	1.75	2.5	3	0.75	1.5	2	2	2.25	2.5	2.5
Inspection Item	ER39	ER40	ER41	ER42	ER43	ER44	ER45	ER46	ER47	ER48	ER49	ER50	ER51	ER52	ER53	ER54	ER55	ER56	ER57
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)	1.5	1	2	1.25	1.5	2.5	1.75	2.25	2.5	1.25	1.25	1	1	0	0.75	0	1	0	0.25
Inspection Item	ER58	ER59	ER60	ER61	ER62	ER63	ER64	ER65	ER66	ER67	ER68	ER69	ER70	ER71	ER72	ER73	ER74	ER75	ER76
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)	1.5	1	1.5	0	0.75	2	1.5	1.5	2	0	1.5	1	0	1	2	1.25	0	0	4
Inspection Item	ER77	ER78	ER79	ER80	ER81	ER82	ER83	ER84	ER85	ER86	ER87	ER88	ER89	ER90	ER91	ER92			
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
5.2 Measured Soil Thickness Loss (inches)	0.75	1	0.5	1	1.25	1	0.25	2	0.5	0	0	1.5	1.5	1.25	1.25	0.5			

Form SOP 001-1
ICS Inspection Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations with GPS coordinates, and photographs as needed. Provide attachments as appropriate.

Note 1: An animal hole greater than 3" was observed near ER39. GPS coordinates N39° 49.863' W104° 50.484'. Please see attached Photo 1.

ER76 note: A rodent hole was present on the north side of the monument, which is the cardinal direction the monuments are measured at. The south, west, and north areas around the monument appeared to have erosion from rodent activity. The hole was backfilled for the purpose of measurement, but the ER measurement was outside of the non-routine trigger level. A NRAP will be prepared for maintenance. See attached photos for reference.

*Repaired in accordance with approved NRAP-2024-002 on November 20, 2024.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O =
Navarro OU = Navarro
Date: 2024.10.03 11:00:56 -06'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature and Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU =
Navarro Research and Engineering, Inc.
Date: 2024.10.16 14:12:11 -06'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Photo 1: ICS animal hole near ER39



ER76 measurements

ER76 measured on north side 4.0"



ER76 measured on south side 2.75"



ER 76 measurements

ER 76 measured east side 1.75"



ER 76 measured west side 3.75"



ER 76 measurements

ER 76



ER 76 animal hole north side of monument



Form SOP 001-1 ICS Inspection Form

Inspector's Names: K. Hoffman, V. Stewart, J. Chisholm						Inspection Date(s): 2/5/25					
Inspection Type: ☒ Type I ☐ Type II ☐ Post-Storm											
Drive-around Post-Storm Inspection Date (taken from Logbook): N/A <i>Note: Post-storm event inspection items are indicated with a * next to the Inspection Item number.</i>								Date(s) of Significant Storm Event: N/A			
								Total Precipitation (in): N/A			
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, calm winds, 30's											
Attachments: ☐ Photographs ☐ Figures ☐ Other											
Inspection Item		Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)		
		Y	N	N/A	Y	N	N/A				
1.0 Surface Conditions											
1.1* Erosion rills, gullies, or sheet erosion		☐	☒	☐	☐	☐	☒	none			
1.2* Conditions that could interrupt cover surface drainage (ponding areas, ruts, hole greater than 3" in diameter)		☐	☒	☐	☐	☐	☒	none			
1.3 Excessive animal trails		☐	☒	☐	☐	☐	☒	none			
1.4 Widespread burrowing animal holes		☐	☒	☐	☐	☐	☒	none			
1.5* Extensive linear cracks		☐	☒	☐	☐	☐	☒	none			
1.6 Vandalism, or intrusive damage such as unplanned excavation, drilling, grading, damage to engineering or access controls		☐	☒	☐	☐	☐	☒	none			

Form SOP 001-1
ICS Inspection Form

Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
2.0 Vegetative Cover								
2.1 Bare area or areas of poor growth greater than 100 square feet	☐	☒	☐	☐	☐	☒	none	
2.2 Areas of vegetation stress greater than 100 square feet (over grazing, discoloration, pedestalling)	☐	☒	☐	☐	☐	☒	none	
2.3 Deep rooted, noxious or undesirable weedy species	☐	☒	☐	☐	☐	☒	none	
2.4 Excessive litter accumulation	☐	☒	☐	☐	☐	☒	none	
3.0 Engineering and Access Controls								
3.1 The perimeter fence is damaged	☐	☒	☐	☐	☐	☒	none	
3.2 Debris has collected along the perimeter fence	☐	☒	☐	☐	☐	☒	none	
3.3 Obelisks are damaged, not visible, or not legible	☐	☒	☐	☐	☐	☒	none	
3.4 Warning signs are not legible from 25 feet	☐	☒	☐	☐	☐	☒	none	
3.5* Damage to the Perimeter Access Road such as potholes, washouts, washboard, or burrowing	☐	☒	☐	☐	☐	☒	none	

Form SOP 001-1
ICS Inspection Form

4.0 Surface Drainage Controls: <i>Were the following conditions observed during the inspection of the stormwater drainage controls? Check all that apply.</i>																									
Inspection Item	Channel Number																								
	1	2	3	4	5	6	7	8	9	10	11	11A	12	13	14	15	15A	16	17	18	19	20	21	22	23
4.1* Impeded drainage or ponding in the channel (siltation/debris present)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
4.2* Inadequate protective vegetation	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
4.3* Erosion rills or gullies in the grass-lined channel	☐	☐	☐			☐	☐	☐	☐	☐			☐		☐	☐		☐		☐	☐	☐	☐		☐
4.4* Cracked or degraded concrete				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	
4.5* Expansion joint damage (missing caulk)				☒	☐	☒					☐	☒	☐	☐		☐	☒	☐	☒	☒	☐				☐
4.6* Inhibited drainage from the soil to the concrete-lined channel				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	
4.7* Subsidence or undercutting of the concrete-lined channel				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	

Form SOP 001-1
ICS Inspection Form

5.0 Erosion/Settlement Monuments: <i>Inspect monuments and record the soil thickness loss, if any. Perform during spring Type II and fall Type I inspections.</i>																			
Inspection Item	ER01	ER02	ER03	ER04	ER05	ER06	ER07	ER08	ER09	ER10	ER11	ER12	ER13	ER14	ER15	ER16	ER17	ER18	ER19
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)																			
Inspection Item	ER20	ER21	ER22	ER23	ER24	ER25	ER26	ER27	ER28	ER29	ER30	ER31	ER32	ER33	ER34	ER35	ER36	ER37	ER38
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)																			
Inspection Item	ER39	ER40	ER41	ER42	ER43	ER44	ER45	ER46	ER47	ER48	ER49	ER50	ER51	ER52	ER53	ER54	ER55	ER56	ER57
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)																			
Inspection Item	ER58	ER59	ER60	ER61	ER62	ER63	ER64	ER65	ER66	ER67	ER68	ER69	ER70	ER71	ER72	ER73	ER74	ER75	ER76
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)																			
Inspection Item	ER77	ER78	ER79	ER80	ER81	ER82	ER83	ER84	ER85	ER86	ER87	ER88	ER89	ER90	ER91	ER92			
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
5.2 Measured Soil Thickness Loss (inches)																			

Form SOP 001-1
ICS Inspection Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations with GPS coordinates, and photographs as needed. Provide attachments as appropriate.

This inspection was moved to February due to inclement weather and snow covered inspection areas during January.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O = Navarro OU = Navarro
Date: 2025.02.05 14:43:52 -07'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature and Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc.
Date: 2025.02.07 11:26:25 -07'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 001-1
ICS Inspection Form

Inspector's Names: M. Jones, K. Hoffman, V. Stewart					Inspection Date(s): 4/9/25					
Inspection Type: ☐ Type I ☒ Type II ☐ Post-Storm										
Drive-around Post-Storm Inspection Date (taken from Logbook): N/A <i>Note: Post-storm event inspection items are indicated with a * next to the Inspection Item number.</i>						Date(s) of Significant Storm Event: N/A				
Inspection Conditions: Previous 24-hour precipitation: 0						Weather Conditions: sunny, calm winds, warm				
Attachments: ☒ Photographs ☒ Figures ☒ Other										
Inspection Item		Condition Present			Repeat or Chronic Condition			Inspection Note		Confirm Completed Actions (Initial and Date)
		Y	N	N/A	Y	N	N/A			
1.0 Surface Conditions										
1.1* Erosion rills, gullies, or sheet erosion		☐	☒	☐	☐	☐	☒	none		
1.2* Conditions that could interrupt cover surface drainage (ponding areas, ruts, hole greater than 3" in diameter)		☒	☐	☐	☐	☒	☐	Note 1.		Repaired April 15, 2025. MJ 4/22/25
1.3 Excessive animal trails		☐	☒	☐	☐	☐	☒	none		
1.4 Widespread burrowing animal holes		☐	☒	☐	☐	☐	☒	none		
1.5* Extensive linear cracks		☐	☒	☐	☐	☐	☒	none		
1.6 Vandalism, or intrusive damage such as unplanned excavation, drilling, grading, damage to engineering or access controls		☐	☒	☐	☐	☐	☒	none		

Form SOP 001-1
ICS Inspection Form

Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
2.0 Vegetative Cover								
2.1 Bare area or areas of poor growth greater than 100 square feet	☐	☒	☐	☐	☐	☒	none	
2.2 Areas of vegetation stress greater than 100 square feet (over grazing, discoloration, pedestalling)	☐	☒	☐	☐	☐	☒	none	
2.3 Deep rooted, noxious or undesirable weedy species	☒	☐	☐	☐	☒	☐	Note 2.	Weed control is on-going. MJ 4/22/25
2.4 Excessive litter accumulation	☐	☒	☐	☐	☐	☒	none	
3.0 Engineering and Access Controls								
3.1 The perimeter fence is damaged	☐	☒	☐	☐	☐	☒	none	
3.2 Debris has collected along the perimeter fence	☐	☒	☐	☐	☐	☒	none	
3.3 Obelisks are damaged, not visible, or not legible	☐	☒	☐	☐	☐	☒	none	
3.4 Warning signs are not legible from 25 feet	☐	☒	☐	☐	☐	☒	none	
3.5* Damage to the Perimeter Access Road such as potholes, washouts, washboard, or burrowing	☐	☒	☐	☐	☐	☒	none	

Form SOP 001-1
ICS Inspection Form

4.0 Surface Drainage Controls: <i>Were the following conditions observed during the inspection of the stormwater drainage controls? Check all that apply.</i>																									
Inspection Item	Channel Number																								
	1	2	3	4	5	6	7	8	9	10	11	11A	12	13	14	15	15A	16	17	18	19	20	21	22	23
4.1* Impeded drainage or ponding in the channel (siltation/debris present)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
4.2* Inadequate protective vegetation	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
4.3* Erosion rills or gullies in the grass-lined channel	☐	☐	☐			☐	☐	☐	☐	☐			☐		☐	☐		☐		☐	☐	☐	☐		☐
4.4* Cracked or degraded concrete				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	
4.5* Expansion joint damage (missing caulk)				☒	☐	☒					☐	☒	☐	☐		☐	☒	☐	☒	☒	☐				☐
4.6* Inhibited drainage from the soil to the concrete-lined channel				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	
4.7* Subsidence or undercutting of the concrete-lined channel				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	

Form SOP 001-1
ICS Inspection Form

5.0 Erosion/Settlement Monuments: <i>Inspect monuments and record the soil thickness loss, if any. Perform during spring Type II and fall Type I inspections.</i>																			
Inspection Item	ER01	ER02	ER03	ER04	ER05	ER06	ER07	ER08	ER09	ER10	ER11	ER12	ER13	ER14	ER15	ER16	ER17	ER18	ER19
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)	0.25	1	0	2.75	1	2.5	0	2	1.5	1.5	0.75	1.25	1	1	0	2	0.25	0	0
Inspection Item	ER20	ER21	ER22	ER23	ER24	ER25	ER26	ER27	ER28	ER29	ER30	ER31	ER32	ER33	ER34	ER35	ER36	ER37	ER38
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)	1.25	0.5	1.5	0.5	0	1	0	1	1.25	1.5	2	2.5	0.5	1.25	1.75	1.5	2	2.25	2.5
Inspection Item	ER39	ER40	ER41	ER42	ER43	ER44	ER45	ER46	ER47	ER48	ER49	ER50	ER51	ER52	ER53	ER54	ER55	ER56	ER57
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)	1	0.75	1.5	1	1.5	2.25	1.25	1.75	1.75	1.5	1.25	1	1	0.25	1	0	1	0	0.25
Inspection Item	ER58	ER59	ER60	ER61	ER62	ER63	ER64	ER65	ER66	ER67	ER68	ER69	ER70	ER71	ER72	ER73	ER74	ER75	ER76
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)	1.25	1.25	N/A	0	0.25	2.75	1.5	1.5	2.5	0	1.25	1	0	0.75	1.75	1.5	0	0	1.5
Inspection Item	ER77	ER78	ER79	ER80	ER81	ER82	ER83	ER84	ER85	ER86	ER87	ER88	ER89	ER90	ER91	ER92			
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
5.2 Measured Soil Thickness Loss (inches)	0	1	0	0.75	1.25	1.25	0	1.75	0.25	0	0	1	1.5	1.25	1	0			

Form SOP 001-1
ICS Inspection Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations with GPS coordinates, and photographs as needed. Provide attachments as appropriate.

This inspection was performed using the 200-foot spacing +00 E-W transects.

The Carsonite markers need to be replaced for ER60 and ER85. ER60 was missing the cap of the erosion monument and therefore could not be measured. Vegetation efforts conducted in October 2024 most likely contributed to the disturbance of the cap. See attached photos for ER60.

On April 15, Navarro found the cap to ER60 and replaced the cap. The monument measured 1.5".

Note 1: A hole was identified at MJ0002 near point 325E on the north transects. See attached figure for location detail. Additional holes were identified during the inspection and were successfully backfilled upon discovery.

Note 2: There were four areas of cheatgrass observed. These are waypoints MJ0003 on the north transects and KH001 and KH002 on the south transects. There was another area observed localized around ER39 on the north transects. See attached figures for location details.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

Digitally signed by Kim Hoffman
DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou,
email=hoffman@navarro-inc.com, c=US
Date: 2025.04.11 08:59:44 -06'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

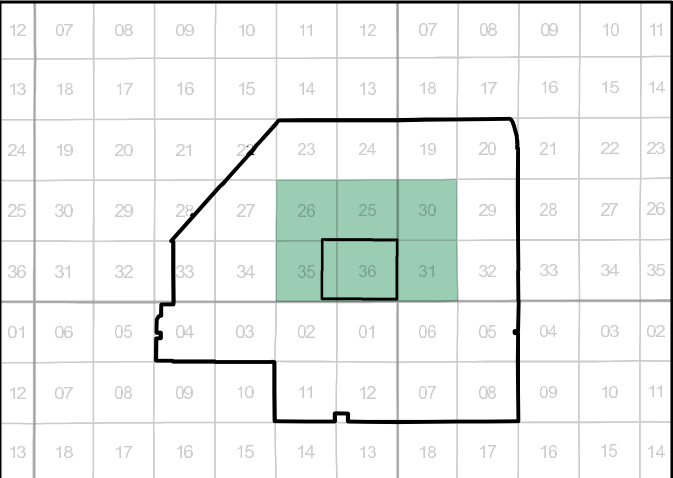
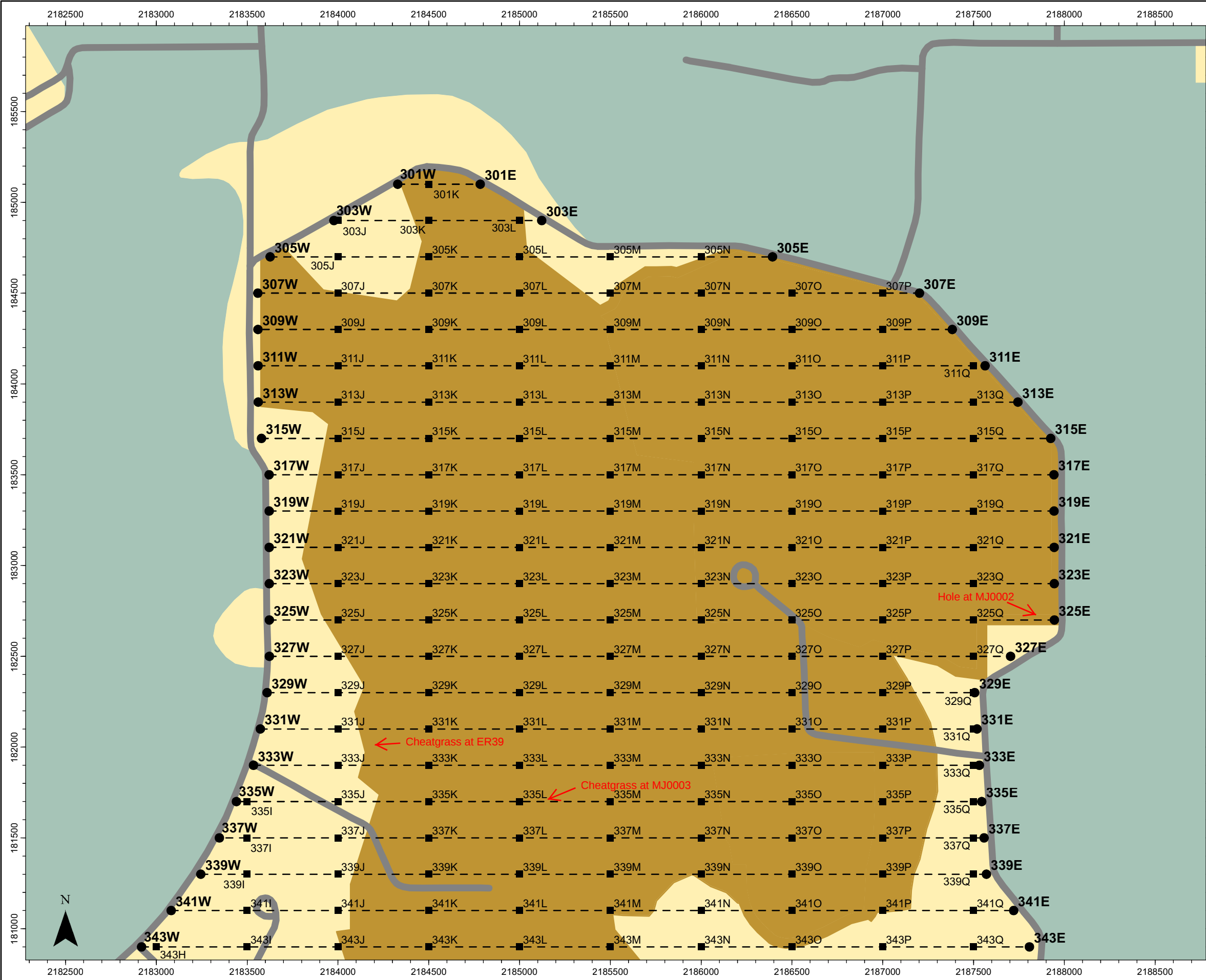
Signature and Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU =
Navarro Research and Engineering, Inc.
Date: 2025.04.22 16:22:02 -06'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:



- Covers
- U.S. Army Property
- USFWS Property
- Roads
- Boundary Points
- Grid Points
- Transects

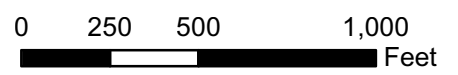
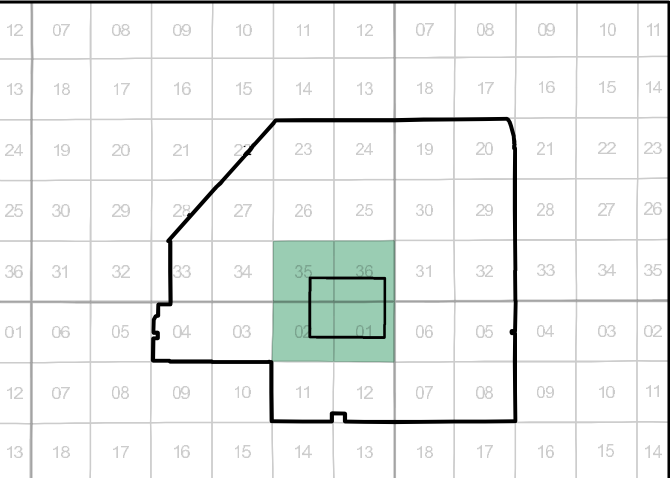
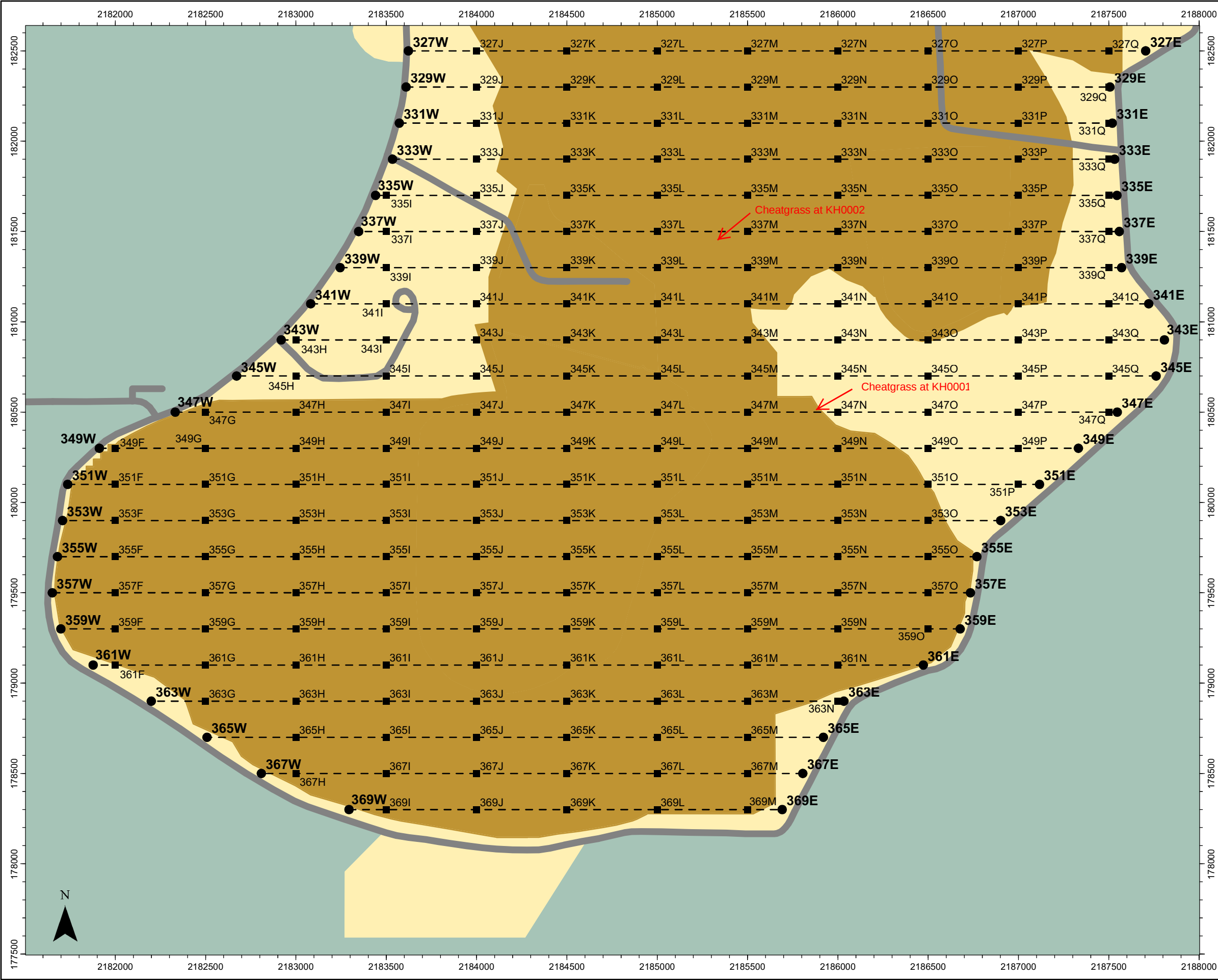


FIGURE 1
INTEGRATED COVER SYSTEM
TYPE II INSPECTION
East/West Transects
200' Spacing at +00'
(Sheet 1 of 2)





- Covers
- U.S. Army Property
- USFWS Property
- Roads
- Boundary Points
- Grid Points
- Transects

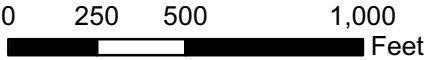


FIGURE 2
INTEGRATED COVER SYSTEM
TYPE II INSPECTION
East/West Transects
200' Spacing at +00'
(Sheet 2 of 2)

ICS Type II April 2025 Inspection Observations

<u>Observation</u>	<u>Waypoint</u>
Hole MJ0002	N39 49.973 W104 49.902
Cheatgrass MJ0003	N39 49.816 W104 50.467
Cheatgrass KH0001	N39 49.617 W104 50.301
Cheatgrass KH0002	N39 49.778 W104 50.458

The damaged Carsonite marker and erosion monument observed at ER060.



Form SOP 001-2
ICS Cover Perimeter Survey Monument Inspection Form

Inspector's Names: Nicole Luke, Mike Jones			Inspection Date(s): 5/15, 5/16, 5/19, 5/20, 5/21		
Inspection Conditions: Previous 24-hour precipitation: 0.00" Weather Conditions: Sunny. Breezy.					
Attachments: ☐ Photographs ☐ Figures ☐ Survey Report ☐ Other					
CPSM Number	<i>Check all that apply.</i>				
	Monument has been located.	Monument has been disturbed.	Monument is intact.	Monument is legible.	Monument requires repair.
CPSM-1	☒	☐	☒	☒	☐
CPSM-2	☒	☐	☒	☒	☐
CPSM-3	☒	☐	☒	☒	☐
CPSM-4	☒	☐	☒	☒	☐
CPSM-5	☒	☐	☒	☒	☐
CPSM-6	☒	☐	☒	☒	☐
CPSM-7	☒	☐	☒	☒	☐
CPSM-8	☒	☐	☒	☒	☐
CPSM-9	☒	☐	☒	☒	☐
CPSM-10	☒	☐	☒	☒	☐
CPSM-11	☒	☐	☒	☒	☐
CPSM-12	☒	☐	☒	☒	☐
CPSM-13	☒	☐	☒	☒	☐
CPSM-14	☒	☐	☒	☒	☐
CPSM-15	☒	☐	☒	☒	☐
CPSM-16	☒	☐	☒	☒	☐
CPSM-17	☒	☐	☒	☒	☐
CPSM-18	☒	☐	☒	☒	☐
CPSM-19	☒	☐	☒	☒	☐
CPSM-20	☒	☐	☒	☒	☐
CPSM-21	☒	☐	☒	☒	☐
CPSM-22	☒	☐	☒	☒	☐
CPSM-23	☒	☐	☒	☒	☐

Form SOP 001-2
ICS Cover Perimeter Survey Monument Inspection Form

CPSM Number	<i>Check all that apply.</i>				
	Monument has been located.	Monument has been disturbed.	Monument is intact.	Monument is legible.	Monument requires repair.
CPSM-24	☒	☐	☒	☒	☐
CPSM-25	☒	☐	☒	☒	☐
CPSM-26	☒	☐	☒	☒	☐
CPSM-27	☒	☐	☒	☒	☐
CPSM-28	☒	☐	☒	☒	☐
CPSM-29	☒	☐	☒	☒	☐
CPSM-30	☒	☐	☒	☒	☐
CPSM-31	☒	☐	☒	☒	☐
CPSM-32	☒	☐	☒	☒	☐
CPSM-33	☒	☐	☒	☒	☐
CPSM-34	☒	☐	☒	☒	☐
CPSM-35	Location is in concrete channel outlet. No monument present.				
CPSM-36	☒	☐	☒	☒	☐
CPSM-37	☒	☐	☒	☒	☐
CPSM-38	☒	☐	☒	☒	☐
CPSM-39	☒	☐	☒	☒	☐
CPSM-40	☒	☐	☒	☒	☐
CPSM-41	☒	☐	☒	☒	☐
CPSM-42	☒	☐	☒	☒	☐
CPSM-43	☒	☐	☒	☒	☐
CPSM-44	☒	☐	☒	☒	☐
CPSM-45	☒	☐	☒	☒	☐
CPSM-46	☒	☐	☒	☒	☐
CPSM-47	☒	☐	☒	☒	☐
CPSM-48	☒	☐	☒	☒	☐
CPSM-49	☒	☐	☒	☐	☐

Form SOP 001-2
ICS Cover Perimeter Survey Monument Inspection Form

CPSM Number	<i>Check all that apply.</i>				
	Monument has been located.	Monument has been disturbed.	Monument is intact.	Monument is legible.	Monument requires repair.
CPSM-50	☒	☐	☒	☐	☐
CPSM-51	☒	☐	☒	☐	☐
CPSM-52	☒	☐	☒	☐	☐
CPSM-53	☒	☐	☒	☒	☐
CPSM-54	☒	☐	☒	☒	☐
CPSM-55	☒	☐	☒	☒	☐
CPSM-56	☒	☐	☒	☒	☐
CPSM-57	☒	☐	☒	☒	☐
CPSM-58	☒	☐	☒	☒	☐
CPSM-59	☒	☐	☒	☒	☐
CPSM-60	☒	☐	☒	☒	☐
CPSM-61	☒	☐	☒	☒	☐
CPSM-62	☒	☐	☒	☒	☐
CPSM-63	☒	☐	☒	☒	☐
CPSM-64	☒	☐	☒	☒	☐
CPSM-65	☒	☐	☒	☒	☐
CPSM-66	☒	☐	☒	☒	☐
CPSM-67	☒	☐	☒	☒	☐
CPSM-68	☒	☐	☒	☒	☐
CPSM-69	☒	☐	☒	☒	☐
CPSM-70	☒	☐	☒	☒	☐
CPSM-71	☒	☐	☒	☒	☐
CPSM-72	☒	☐	☒	☒	☐
CPSM-73	☒	☐	☒	☒	☐
CPSM-74	☒	☐	☒	☒	☐
CPSM-75	☒	☐	☒	☒	☐

Form SOP 001-2
ICS Cover Perimeter Survey Monument Inspection Form

CPSM Number	<i>Check all that apply.</i>				
	Monument has been located.	Monument has been disturbed.	Monument is intact.	Monument is legible.	Monument requires repair.
CPSM-76	☒	☐	☒	☒	☐
CPSM-77	☒	☐	☒	☒	☐
CPSM-78	☒	☐	☒	☒	☐
CPSM-79	Location is in concrete channel outlet. No monument present.				
CPSM-80	☒	☐	☒	☒	☐
CPSM-81	☒	☐	☒	☒	☐
CPSM-82	☒	☐	☒	☒	☐
CPSM-83	☒	☐	☒	☒	☐
CPSM-84	☒	☐	☒	☒	☐
CPSM-85	☒	☐	☒	☒	☐
CPSM-86	☒	☐	☒	☒	☐
CPSM-87	☒	☐	☒	☒	☐
CPSM-88	☒	☐	☒	☒	☐
CPSM-89	☒	☐	☒	☒	☐
CPSM-90	☒	☐	☒	☒	☐
CPSM-91	☒	☐	☒	☒	☐
CPSM-92	☒	☐	☒	☒	☐
CPSM-93	☒	☐	☒	☒	☐
CPSM-94	☒	☐	☒	☒	☐
CPSM-95	☒	☐	☒	☒	☐
CPSM-96	☒	☐	☒	☒	☐
CPSM-97	☒	☐	☒	☒	☐
CPSM-98	☒	☐	☒	☒	☐
CPSM-99	☒	☐	☒	☒	☐
CPSM-100	☒	☐	☒	☒	☐
CPSM-101	☒	☐	☒	☒	☐

Form SOP 001-2
ICS Cover Perimeter Survey Monument Inspection Form

CPSM Number	<i>Check all that apply.</i>				
	Monument has been located.	Monument has been disturbed.	Monument is intact.	Monument is legible.	Monument requires repair.
CPSM-102	☒	☐	☒	☒	☐
CPSM-103	☒	☐	☒	☒	☐
CPSM-104	☒	☐	☒	☒	☐
CPSM-105	☒	☐	☒	☒	☐
CPSM-106	☒	☐	☒	☒	☐
CPSM-107	☒	☐	☒	☒	☐
CPSM-108	Location is in concrete channel outlet. No monument present.				
CPSM-109	☒	☐	☒	☒	☐
CPSM-110	☒	☐	☒	☒	☐
CPSM-111	☒	☐	☒	☒	☐
CPSM-112	☒	☐	☒	☒	☒
CPSM-113	☒	☐	☒	☒	☐
CPSM-114	☒	☐	☒	☒	☐
CPSM-115	☒	☐	☒	☒	☐
CPSM-116	☒	☐	☒	☒	☐
CPSM-117	☒	☐	☒	☒	☐
CPSM-118	☒	☐	☒	☒	☒
CPSM-119	☒	☐	☒	☒	☐
CPSM-120	☒	☐	☒	☒	☐
CPSM-121	☒	☐	☒	☒	☐
CPSM-122	☒	☐	☒	☒	☐
CPSM-123	☒	☐	☒	☒	☐
CPSM-124	☒	☐	☒	☒	☐
CPSM-125	☒	☐	☒	☒	☐
CPSM-126	☒	☐	☒	☒	☐
CPSM-127	☒	☐	☒	☒	☐

Form SOP 001-2
ICS Cover Perimeter Survey Monument Inspection Form

CPSM Number	<i>Check all that apply.</i>				
	Monument has been located.	Monument has been disturbed.	Monument is intact.	Monument is legible.	Monument requires repair.
CPSM-128	☒	☐	☒	☒	☐
CPSM-129	☒	☐	☒	☒	☐
CPSM-130	☒	☐	☒	☒	☐
CPSM-131	☒	☐	☒	☒	☐
CPSM-132	☒	☐	☒	☒	☐
CPSM-133	☒	☐	☒	☒	☐
CPSM-134	☒	☐	☒	☒	☐
CPSM-135	☒	☐	☒	☒	☐
CPSM-136	☒	☐	☒	☒	☐
CPSM-137	☒	☐	☒	☒	☐
CPSM-138	☒	☐	☒	☒	☐
CPSM-139	☒	☐	☒	☒	☐
CPSM-140	☒	☐	☒	☒	☐
CPSM-141	☒	☐	☒	☒	☐
CPSM-142	☒	☐	☒	☒	☐
CPSM-143	☒	☐	☒	☒	☐
CPSM-144	☒	☐	☒	☒	☐
CPSM-145	☒	☐	☒	☒	☐
CPSM-146	☒	☐	☒	☒	☐
CPSM-147	☒	☐	☒	☒	☐
CPSM-148	☒	☐	☒	☒	☐
CPSM-149	☒	☐	☒	☒	☐
CPSM-150	Location is on concrete base of fence post. No monument present.				
CPSM-151	Location is on concrete base of fence post. No monument present.				
CPSM-152	☒	☐	☒	☒	☐
CPSM-153	☒	☐	☒	☒	☐

Form SOP 001-2
ICS Cover Perimeter Survey Monument Inspection Form

CPSM Number	<i>Check all that apply.</i>				
	Monument has been located.	Monument has been disturbed.	Monument is intact.	Monument is legible.	Monument requires repair.
CPSM-154	☒	☐	☒	☒	☐
CPSM-155	☒	☐	☒	☒	☐
CPSM-156	☒	☐	☒	☒	☐
CPSM-157	☒	☐	☒	☒	☐
CPSM-158	☒	☐	☒	☒	☐
CPSM-159	☒	☐	☒	☒	☐
CPSM-160	☒	☐	☒	☒	☐
CPSM-161	☒	☐	☒	☒	☐
CPSM-162	☒	☐	☒	☒	☐
CPSM-163	☒	☐	☒	☒	☐
CPSM-164	☒	☐	☒	☒	☐
CPSM-165	☒	☐	☒	☒	☐
CPSM-166	☒	☐	☒	☒	☐
CPSM-167	☒	☐	☒	☒	☐
CPSM-168	☒	☐	☒	☒	☐
CPSM-169	☒	☐	☒	☒	☐
CPSM-170	☒	☐	☒	☒	☐
CPSM-171	☒	☐	☒	☒	☐
CPSM-172	☒	☐	☒	☒	☐
CPSM-173	☒	☐	☒	☒	☐
CPSM-174	☒	☐	☒	☒	☐
CPSM-175	☒	☐	☒	☒	☐
CPSM-176	☒	☐	☒	☒	☐
CPSM-177	☒	☐	☒	☒	☐
CPSM-178	☒	☐	☒	☒	☐
CPSM-179	☒	☐	☒	☒	☐

Form SOP 001-2
ICS Cover Perimeter Survey Monument Inspection Form

CPSM Number	<i>Check all that apply.</i>				
	Monument has been located.	Monument has been disturbed.	Monument is intact.	Monument is legible.	Monument requires repair.
CPSM-180	☒	☐	☒	☒	☐
CPSM-181	☒	☐	☒	☒	☐
CPSM-182	☒	☐	☒	☒	☐
CPSM-183	☒	☐	☒	☒	☐
CPSM-184	☒	☐	☒	☒	☐
CPSM-185	☒	☐	☒	☒	☐
CPSM-186	☒	☐	☒	☒	☐
CPSM-187	☒	☐	☒	☒	☐
CPSM-188	☒	☐	☒	☒	☐
CPSM-189	☒	☐	☒	☒	☐
CPSM-190	☒	☐	☒	☒	☐
CPSM-191	☒	☐	☒	☒	☐
CPSM-192	☒	☐	☒	☒	☐
CPSM-193	☒	☐	☒	☒	☐
CPSM-194	☒	☐	☒	☒	☐
CPSM-195	Location is in concrete channel outlet. No monument present.				
CPSM-196	☒	☐	☒	☒	☐
CPSM-197	☒	☐	☒	☒	☐
CPSM-198	☒	☐	☒	☒	☐
CPSM-199	☒	☐	☒	☒	☐
CPSM-200	☒	☐	☒	☒	☐
CPSM-201	☒	☐	☒	☒	☐
CPSM-202	☒	☐	☒	☒	☐
CPSM-203	☒	☐	☒	☒	☐
CPSM-204	☒	☐	☒	☒	☐
CPSM-205	☒	☐	☒	☒	☐

Form SOP 001-2
ICS Cover Perimeter Survey Monument Inspection Form

CPSM Number	<i>Check all that apply.</i>				
	Monument has been located.	Monument has been disturbed.	Monument is intact.	Monument is legible.	Monument requires repair.
CPSM-206	☒	☐	☒	☒	☐
CPSM-207	☒	☐	☒	☒	☐
CPSM-208	☒	☐	☒	☒	☐
CPSM-209	☒	☐	☒	☒	☐
CPSM-210	☒	☐	☒	☒	☐
CPSM-211	☒	☐	☒	☒	☐
CPSM-212	☒	☐	☒	☒	☐
CPSM-213	☒	☐	☒	☒	☐
CPSM-214	☒	☐	☒	☒	☐
CPSM-215	☒	☐	☒	☒	☐
CPSM-216	☒	☐	☒	☒	☐
CPSM-217	☒	☐	☒	☒	☐
CPSM-218	☒	☐	☒	☒	☐
CPSM-219	☒	☐	☒	☒	☐
CPSM-220	☒	☐	☒	☒	☐
CPSM-221	☒	☐	☒	☒	☐
CPSM-222	☒	☐	☒	☒	☐
CPSM-223	☒	☐	☒	☒	☐
CPSM-224	☒	☐	☒	☒	☐
CPSM-225	☒	☐	☒	☒	☐
CPSM-226	☒	☐	☒	☒	☐
CPSM-227	☒	☐	☒	☒	☐
CPSM-228	☒	☐	☒	☒	☐

Form SOP 001-2
ICS Cover Perimeter Survey Monument Inspection Form

Inspection Notes:

5/15/2025

Nicole recommends revisiting CPSM-112 and CPSM-118 to remove excess grass, so that these monuments are easier to find in the future.

5/20/2025

Nicole easily located CPSM-49, CPSM-50, CPSM-51, and CPSM-52. They do not have numbers.

5/21/2025

The location for CPSM-79 is within concrete-lined channel 18. The monument does not exist.

Inspector

Name: Nicole Luke

Signature and Date: Karyn Nicole Luke

Digitally signed by: Karyn Nicole Luke
DN: CN = Karyn Nicole Luke email = luke@navarro-inc.
com C = US O = Navarro Research and Engineering, Inc.
Date: 2025.07.08 15:21:07 -06'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature and Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.
com C = US OU = Navarro Research and Engineering, Inc.
Date: 2025.07.08 14:46:59 -06'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 001-1 ICS Inspection Form

Inspector's Names: M. Jones, J. Chisholm, D. McNeil, J. Fritz						Inspection Date(s): 7/2/25					
Inspection Type: ☒ Type I ☐ Type II ☐ Post-Storm											
Drive-around Post-Storm Inspection Date (taken from Logbook): N/A <i>Note: Post-storm event inspection items are indicated with a * next to the Inspection Item number.</i>								Date(s) of Significant Storm Event: N/A			
								Total Precipitation (in): N/A			
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, 80's, calm wind											
Attachments: ☐ Photographs ☐ Figures ☐ Other											
Inspection Item		Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)		
		Y	N	N/A	Y	N	N/A				
1.0 Surface Conditions											
1.1* Erosion rills, gullies, or sheet erosion		☐	☒	☐	☐	☐	☒	none			
1.2* Conditions that could interrupt cover surface drainage (ponding areas, ruts, hole greater than 3" in diameter)		☐	☒	☐	☐	☐	☒	none			
1.3 Excessive animal trails		☐	☒	☐	☐	☐	☒	none			
1.4 Widespread burrowing animal holes		☐	☒	☐	☐	☐	☒	none			
1.5* Extensive linear cracks		☐	☒	☐	☐	☐	☒	none			
1.6 Vandalism, or intrusive damage such as unplanned excavation, drilling, grading, damage to engineering or access controls		☐	☒	☐	☐	☐	☒	none			

Form SOP 001-1
ICS Inspection Form

Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
2.0 Vegetative Cover								
2.1 Bare area or areas of poor growth greater than 100 square feet	☐	☒	☐	☐	☐	☒	none	
2.2 Areas of vegetation stress greater than 100 square feet (over grazing, discoloration, pedestalling)	☐	☒	☐	☐	☐	☒	none	
2.3 Deep rooted, noxious or undesirable weedy species	☒	☐	☐	☐	☒	☐	cheatgrass observed	
2.4 Excessive litter accumulation	☐	☒	☐	☐	☐	☒	none	
3.0 Engineering and Access Controls								
3.1 The perimeter fence is damaged	☐	☒	☐	☐	☐	☒	none	
3.2 Debris has collected along the perimeter fence	☐	☒	☐	☐	☐	☒	none	
3.3 Obelisks are damaged, not visible, or not legible	☐	☒	☐	☐	☐	☒	none	
3.4 Warning signs are not legible from 25 feet	☐	☒	☐	☐	☐	☒	none	
3.5* Damage to the Perimeter Access Road such as potholes, washouts, washboard, or burrowing	☐	☒	☐	☐	☐	☒	none	

Form SOP 001-1
ICS Inspection Form

4.0 Surface Drainage Controls: <i>Were the following conditions observed during the inspection of the stormwater drainage controls? Check all that apply.</i>																									
Inspection Item	Channel Number																								
	1	2	3	4	5	6	7	8	9	10	11	11A	12	13	14	15	15A	16	17	18	19	20	21	22	23
4.1* Impeded drainage or ponding in the channel (siltation/debris present)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
4.2* Inadequate protective vegetation	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
4.3* Erosion rills or gullies in the grass-lined channel	☐	☐	☐			☐	☐	☐	☐	☐			☐		☐	☐		☐		☐	☐	☐	☐		☐
4.4* Cracked or degraded concrete				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	
4.5* Expansion joint damage (missing caulk)				☒	☐	☒					☐	☒	☐	☐		☐	☒	☐	☒	☒	☐				☐
4.6* Inhibited drainage from the soil to the concrete-lined channel				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	
4.7* Subsidence or undercutting of the concrete-lined channel				☐	☐	☐					☐	☐	☐	☐		☐	☐	☐	☐	☐				☐	

Form SOP 001-1
ICS Inspection Form

5.0 Erosion/Settlement Monuments: <i>Inspect monuments and record the soil thickness loss, if any. Perform during spring Type II and fall Type I inspections.</i>																			
Inspection Item	ER01	ER02	ER03	ER04	ER05	ER06	ER07	ER08	ER09	ER10	ER11	ER12	ER13	ER14	ER15	ER16	ER17	ER18	ER19
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)																			
Inspection Item	ER20	ER21	ER22	ER23	ER24	ER25	ER26	ER27	ER28	ER29	ER30	ER31	ER32	ER33	ER34	ER35	ER36	ER37	ER38
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)																			
Inspection Item	ER39	ER40	ER41	ER42	ER43	ER44	ER45	ER46	ER47	ER48	ER49	ER50	ER51	ER52	ER53	ER54	ER55	ER56	ER57
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)																			
Inspection Item	ER58	ER59	ER60	ER61	ER62	ER63	ER64	ER65	ER66	ER67	ER68	ER69	ER70	ER71	ER72	ER73	ER74	ER75	ER76
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
5.2 Measured Soil Thickness Loss (inches)																			
Inspection Item	ER77	ER78	ER79	ER80	ER81	ER82	ER83	ER84	ER85	ER86	ER87	ER88	ER89	ER90	ER91	ER92			
5.1 Monument is damaged or illegible <i>Check all that apply.</i>	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
5.2 Measured Soil Thickness Loss (inches)																			

Form SOP 001-1
ICS Inspection Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations with GPS coordinates, and photographs as needed. Provide attachments as appropriate.

This inspection was performed concurrently with the Five-Year Review inspection.

Inspector	
Name: Kim Hoffman	Signature and Date: Kim Hoffman  Digitally signed by: Kim Hoffman DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O = Navarro OU = Navarro Date: 2025.07.03 07:15:27 -06'00'
Covers Manager Review of Inspection Documentation	
Name: Michael W. Jones	Signature and Date: Michael W. Jones  Digitally signed by: Michael W. Jones DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc. Date: 2025.07.08 14:40:29 -06'00'
Covers Manager Confirmation of Completed Actions	
Name:	Signature and Date:

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: K. Hoffman, V. Stewart				Inspection Date(s): 10/2/24				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, calm winds, warm								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	none	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	none	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	N/A		011 (SP)	N/A	
002 (SDT)	0		007 (Basin A)	N/A		012 (SP)	N/A	
003 (SDT)	4		008 (CAT)	N/A		013 (SP)	N/A	
004 (CAT)	N/A		009 (Basin A)	N/A		014 (LB)	N/A	
005 (CAT)	N/A		010 (Basin A)	N/A		015 (Basin A)	N/A	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

None

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O =
Navarro OU = Navarro
Date: 2024.10.02 14:20:46 -06'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature And Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU
= Navarro Research and Engineering, Inc.
Date: 2024.10.16 14:10:57 -06'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: M. Jones, K. Hoffman, V. Stewart, J. Chisholm, M. Collar				Inspection Date(s): 11/13/24				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: mostly clear, 40's, sunny								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	none	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	none	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	0		011 (SP)	0	
002 (SDT)	0		007 (Basin A)	0		012 (SP)	0	
003 (SDT)	6		008 (CAT)	0		013 (SP)	2	
004 (CAT)	1		009 (Basin A)	0		014 (LB)	2	
005 (CAT)	7		010 (Basin A)	Trace		015 (Basin A)	0	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

Lysimeters 004, 005, 006, 007, 011, and 015 would benefit to have the standing water pumped from inside of the manhole.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O =
Navarro OU = Navarro
Date: 2024.11.14 07:32:41 -07'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature And Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU
= Navarro Research and Engineering, Inc.
Date: 2024.12.12 09:36:04 -07'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: M. Jones, K. Hoffman, V. Stewart				Inspection Date(s): 12/4/24				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: cloudy, calm wind, 30's								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	None	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	None	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	N/A		011 (SP)	N/A	
002 (SDT)	0		007 (Basin A)	N/A		012 (SP)	N/A	
003 (SDT)	Trace		008 (CAT)	N/A		013 (SP)	N/A	
004 (CAT)	N/A		009 (Basin A)	N/A		014 (LB)	N/A	
005 (CAT)	N/A		010 (Basin A)	N/A		015 (Basin A)	N/A	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

No other inspection notes.

Inspector		
Name: Kim Hoffman	Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2024.12.09 09:28:57 -07'00'
Covers Manager Review of Inspection Documentation		
Name: Michael W. Jones	Signature And Date: Michael W. Jones	Digitally signed by: Michael W. Jones DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc. Date: 2024.12.12 09:36:48 -07'00'
Covers Manager Confirmation of Completed Actions		
Name:	Signature and Date:	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: M. Jones, K. Hoffman, V. Stewart				Inspection Date(s): 1/29/25				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: cold, calm winds, sunny								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	none	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	none	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	N/A		011 (SP)	N/A	
002 (SDT)	0		007 (Basin A)	N/A		012 (SP)	N/A	
003 (SDT)	0		008 (CAT)	N/A		013 (SP)	N/A	
004 (CAT)	N/A		009 (Basin A)	N/A		014 (LB)	N/A	
005 (CAT)	N/A		010 (Basin A)	N/A		015 (Basin A)	N/A	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

Inspection was delayed due to inclement weather throughout the month.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O =
Navarro OU = Navarro
Date: 2025.01.29 09:03:13 -07'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature And Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU
= Navarro Research and Engineering, Inc.
Date: 2025.02.07 11:25:47 -07'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: K. Hoffman, V. Stewart, J. Chisholm				Inspection Date(s): 2/5/25				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, calm winds, 30's								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	None	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	None	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	N/A		011 (SP)	N/A	
002 (SDT)	0		007 (Basin A)	N/A		012 (SP)	N/A	
003 (SDT)	0		008 (CAT)	N/A		013 (SP)	N/A	
004 (CAT)	N/A		009 (Basin A)	N/A		014 (LB)	N/A	
005 (CAT)	N/A		010 (Basin A)	N/A		015 (Basin A)	N/A	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

No other inspection notes.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O =
Navarro OU = Navarro
Date: 2025.02.05 14:25:54 -07'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature And Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU
= Navarro Research and Engineering, Inc.
Date: 2025.02.07 11:25:14 -07'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: M. Jones, K. Hoffman, V. Stewart, J. Chisholm, J. Caruso				Inspection Date(s): 3/5/25				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, calm winds, 30's								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	none	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	none	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	N/A		011 (SP)	N/A	
002 (SDT)	0		007 (Basin A)	N/A		012 (SP)	N/A	
003 (SDT)	0		008 (CAT)	N/A		013 (SP)	N/A	
004 (CAT)	N/A		009 (Basin A)	N/A		014 (LB)	N/A	
005 (CAT)	N/A		010 (Basin A)	N/A		015 (Basin A)	N/A	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

No other inspection notes.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O = Navarro OU = Navarro
Date: 2025.03.05 09:55:35 -07'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature And Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc.
Date: 2025.04.22 14:47:48 -06'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: M. Jones, K. Hoffman, N. Rymarz, V. Stewart				Inspection Date(s): 4/8/25				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, calm winds, 70's								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	none	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	none	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	N/A		011 (SP)	N/A	
002 (SDT)	0		007 (Basin A)	N/A		012 (SP)	N/A	
003 (SDT)	0		008 (CAT)	N/A		013 (SP)	N/A	
004 (CAT)	N/A		009 (Basin A)	N/A		014 (LB)	N/A	
005 (CAT)	N/A		010 (Basin A)	N/A		015 (Basin A)	N/A	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

This inspection was rescheduled for 4/8/25 at 1 pm due to inclement weather on 4/2/25.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

 Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O =
Navarro OU = Navarro
Date: 2025.04.09 12:34:16 -06'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature And Date: Michael W. Jones

 Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU =
Navarro Research and Engineering, Inc.
Date: 2025.04.22 14:46:24 -06'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: M. Jones, K. Hoffman, V. Stewart, J. Chisholm				Inspection Date(s): 5/14/25				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, breezy, 50's								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	none	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	none	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	0		011 (SP)	0	
002 (SDT)	0		007 (Basin A)	0		012 (SP)	0	
003 (SDT)	0		008 (CAT)	Trace		013 (SP)	Trace	
004 (CAT)	0		009 (Basin A)	0		014 (LB)	Trace	
005 (CAT)	Trace		010 (Basin A)	0		015 (Basin A)	0	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

Lysimeters 004, 005, 006, 007, 011, 012, 013, and 014 would benefit to have the standing water removed from the manhole.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O = Navarro OU = Navarro
Date: 2025.05.14 12:00:12 -06'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature And Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc.
Date: 2025.06.10 15:20:37 -06'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: M. Jones, K. Hoffman, V. Stewart				Inspection Date(s): 6/11/25				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, calm winds, 60's								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	none	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	none	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	N/A		011 (SP)	N/A	
002 (SDT)	0		007 (Basin A)	N/A		012 (SP)	N/A	
003 (SDT)	0		008 (CAT)	N/A		013 (SP)	N/A	
004 (CAT)	N/A		009 (Basin A)	N/A		014 (LB)	N/A	
005 (CAT)	N/A		010 (Basin A)	N/A		015 (Basin A)	N/A	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

No other inspection notes.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O =
Navarro OU = Navarro
Date: 2025.06.11 10:13:12 -06'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature And Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU
= Navarro Research and Engineering, Inc.
Date: 2025.07.08 14:36:20 -06'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: M. Jones, K. Hoffman, K. Cable, V. Stewart, J. Chisholm				Inspection Date(s): 7/8/25				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, calm winds, 70's								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	none	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	none	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	0		011 (SP)	0	
002 (SDT)	0		007 (Basin A)	0		012 (SP)	0	
003 (SDT)	0		008 (CAT)	Trace		013 (SP)	0	
004 (CAT)	0		009 (Basin A)	0		014 (LB)	0	
005 (CAT)	0		010 (Basin A)	0		015 (Basin A)	0	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

Lysimeters 009 and 010 would benefit to have the standing water pumped from inside the manhole.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

 Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O =
Navarro OU = Navarro
Date: 2025.07.08 14:15:28 -06'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature And Date: Michael W. Jones

 Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU =
Navarro Research and Engineering, Inc.
Date: 2025.07.08 14:36:58 -06'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: M. Jones, K. Hoffman, V. Stewart, J. Chisholm				Inspection Date(s): 8/6/25				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, calm winds, 70's								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	none	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	none	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	N/A		011 (SP)	N/A	
002 (SDT)	0		007 (Basin A)	N/A		012 (SP)	N/A	
003 (SDT)	0		008 (CAT)	N/A		013 (SP)	N/A	
004 (CAT)	N/A		009 (Basin A)	N/A		014 (LB)	N/A	
005 (CAT)	N/A		010 (Basin A)	N/A		015 (Basin A)	N/A	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

No other inspection notes.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

 Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O =
Navarro OU = Navarro
Date: 2025.08.06 08:33:48 -06'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature And Date: Michael W. Jones

 Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU
= Navarro Research and Engineering, Inc.
Date: 2025.09.03 14:02:25 -06'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspector's Names: M. Jones, K. Hoffman, V. Stewart				Inspection Date(s): 9/3/25				
Inspection Conditions: Previous 24-hour precipitation: 0 Weather Conditions: sunny, calm winds, 70's								
Inspection Item	Condition Present			Repeat or Chronic Condition			Inspection Note	Confirm Completed Actions (Initial and Date)
	Y	N	N/A	Y	N	N/A		
1.0 Percolation Collection Manhole (PCM) Condition								
1.1 Damage to the PCM or internal components	☐	☒	☐	☐	☐	☒	none	
1.2 Accumulation of a quantity of water greater than that caused by natural condensation in the manhole	☐	☒	☐	☐	☐	☒	none	
1.3 If the water level observed in the PCM impacts the ability to measure percolation, remove water accumulated in the PCM, and record the quantity here. Quantity removed from the PCM (liters): 0								
2.0 Percolation Collection								
Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)		Lysimeter Number	Measured Water Volume (liter)	
001 (SDT)	0		006 (CAT)	0		011 (SP)	0	
002 (SDT)	0		007 (Basin A)	0		012 (SP)	0	
003 (SDT)	0		008 (CAT)	Trace		013 (SP)	3	
004 (CAT)	1		009 (Basin A)	0		014 (LB)	1	
005 (CAT)	2		010 (Basin A)	0		015 (Basin A)	2	

Form SOP 003-1
ICS Percolation Monitoring System Data Collection and Operation Form

Inspection Notes: For areas with deficiencies, provide identifying labels for deficient areas, descriptions of deficiencies, approximate dimensions of the areas, locations, and photographs. Provide attachments as appropriate.

Lysimeters 008, 009, and 010 would benefit to have the standing water removed from inside the manhole.

Inspector

Name: Kim Hoffman

Signature and Date: Kim Hoffman

Digitally signed by: Kim Hoffman
DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O =
Navarro OU = Navarro
Date: 2025.09.03 10:43:09 -06'00'

Covers Manager Review of Inspection Documentation

Name: Michael W. Jones

Signature And Date: Michael W. Jones

Digitally signed by: Michael W. Jones
DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU
= Navarro Research and Engineering, Inc.
Date: 2025.09.03 14:02:56 -06'00'

Covers Manager Confirmation of Completed Actions

Name:

Signature and Date:

APPENDIX D

Maintenance and Repair Documentation

(October 1, 2024 through September 30, 2025)



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: MRC Services/Weed Wranglers	Project: ICS
Task: maintenance	Date: 10/22/24
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
MRC Services mowed 24.95 acres and drill seeded 5.43 acres on the South Plants 3-foot cover. Weed Wranglers sprayed Piper EZ and Oust XP for ground clear treatment on roads and working surfaces. All work was complete today.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
None	
Comments:	
None	
Additional Documentation Submitted:	
(1) Seed Tag	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2024.12.09 09:35:18 -0700
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, inc. Date: 2024.12.12 09:33:27 -0700

Granite Seed - Denver

3 of 8

From: 490 East 76th Ave., Unit A
Denver, CO 80229

Mix Name: Warm Season with Rice Hulls

3-64305

Mix #: 241563

Warm Season Native

% Pure	Common Name	Variety	G + D or H	Origin
41.24	BUFFALOGRASS	Texoka Tri	90 + 7 = 97	TX
12.77	SIDE-OATS GRAMA	Vaughn	87 + 7 = 94	TX
2.06	BLUE GRAMA	Bad River	73 + 24 = 97	MN
1.54	ALKALI SACATON	VNS	86 + 8 = 94	CO

Date Tested: 23-Nov-22

0.01 Other Crop

Hard Seed: 4.51

42.38 Inert Matter

Noxious Weed: NONE FOUND

0.00 Weed Seed

	RICE HULLS	Hullgrow	20.59 Lbs. Bulk
Net Weight:	27.73 Lbs. PLS		50.00 Lbs. Bulk
	Coverage: 50.000 Bulk #		

NOTICE TO BUYER LIMITATIONS OF WARRANTIES AND REMEDIES

Crop yield and quality are dependent upon many factors beyond the control of the labeled seller and NO WARRANTY is made for crop yield and quality. The labeled seller warrants that all seed sold has been labeled as required under applicable state and federal seed law and that the seed conforms to the label description, within recognized tolerances. THIS WARRANTY IS IN LIEU OF ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE. THERE ARE NO WARRANTIES WHICH EXTEND BEYOND THE DESCRIPTION ON THE LABEL.

No claim shall be asserted against the labeled seller unless Buyer reports to the labeled seller within a reasonable period after discovery (not to exceed thirty days), any condition that might lead to a complaint. BUYER'S EXCLUSIVE REMEDY FOR ANY CLAIM OR LOSS RESULTING FROM BREACH OF WARRANTY, BREACH OF CONTRACT OR NEGLIGENCE (INCLUDING BUT NOT LIMITED TO INCIDENTAL OR CONSEQUENTIAL DAMAGES) SHALL BE LIMITED TO REPAYMENT OF THE PURCHASE PRICE.

By acceptance of the seed, Buyer agrees the terms and conditions stated above are a benefit to the bargain and constitute the entire agreement between Buyer and the labeled seller. Buyer shall return the original unopened seed package to the labeled seller within twenty days of receipt for a refund of the purchase price if not accepted under these terms.

NOTICE: REQUIRED ARBITRATION / CONCILIATION / MEDIATION

The seed laws of several states including Arkansas, California, Colorado, Florida, Georgia, Idaho, Illinois, Indiana, Minnesota, Mississippi, Montana, North Dakota, South Carolina (Section 49-21-260), South Dakota, Texas and Washington require arbitration, conciliation or mediation of disputes involving alleged defective seed before certain legal actions may be maintained against a seller. North Carolina offers an alternative to court action that allows claims to be investigated and heard before the Special Seed Board. A complaint (even for AR, CO, FL, IL, IN, MN, MS, MT, NC, SC, TX, VA; signed only; CA, GA, ID, ND, SD) must be filed with the Department of Agriculture or Seed Commissioner (IN) or State Plant Board (ARI) or Commissioner of Agriculture (NC) within such time as to permit an inspection of seed, crops or plants (by an Arbitration Committee - AR, ID, MS, SC). In NC, failure to follow this procedure will limit the amount of damages recoverable. Certified copy of complaint must be sent by registered mail to the labeled seller as provided in individual state law. Information about these requirements may be obtained from the state Department of Agriculture.

Will Call:
Navarro Research and Engineering Inc



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: N/A	Project: ICS
Task: maintenance	Date: 10/28/24
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Navarro personnel used a trail camera to monitor the animal holes observed during the October 2024 inspection near ER39. No activity was observed. These holes were backfilled using existing cover soil at the site.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2024.12.09 09:42:06 -0700
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, inc. Date: 2024.12.12 09:33:57 -0700



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: N/A	Project: ICS
Task: maintenance	Date: 11/12/24
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Navarro personnel graded the west ICS perimeter road to alleviate the washboard.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2024.12.09 09:44:40 -0700
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc. Date: 2024.12.12 09:34:25 -0700



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: N/A	Project: ICS
Task: maintenance	Date: 11/20/24
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Navarro personnel repaired the erosion/animal activity at ICS ER76 in accordance with approved NRAP-2024-002. Navarro personnel also hand seeded/overseeded over the Lysimeter 003 area to encourage native grass establishment.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
Photos of ER76	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2024.12.09 09:53:24 -0700
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, inc. Date: 2024.12.12 09:35:03 -0700



The north side of the repair at ER76.



The west side of the repair at ER76.



The repaired area at ER76 seeded.



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: N/A	Project: ICS
Task: maintenance	Date: 12/5/24
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Navarro personnel hand seeded/overseeded over Lysimeters 001 and 002 to encourage native grass establishment.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2024.12.09 09:56:03 -0700
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, inc. Date: 2024.12.12 09:35:36 -0700



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: N/A	Project: ICS
Task: maintenance	Date: 4-15-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Navarro personnel used a motor grader to grade the entire ICS perimeter road. The following maintenance items were noted to be damaged during the April Type II 2025 inspection and were repaired today: The Carsonite markers were replaced for ER60 and ER85. The cap for ER60 was replaced. Once the cap was replaced the monument measured 1.5". The hole identified as waypoint MJ002 was backfilled using cover soil.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 09:06:13 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com, c=US, ou=Navarro Research and Engineering, inc. Date: 2025.08.03 13:50:29 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information									
Subcontractor: N/A	Project: ICS								
Task: maintenance	Date: 6-16-25								
Weather AM: acceptable	Weather PM: acceptable								
Activities Inspected and Observed:									
Navarro personnel pumped standing water from inside of the ICS lysimeter manholes. The following volumes were removed: <table><tbody><tr><td>Lysimeter 004=201 liters</td><td>Lysimeter 011=167 liters</td></tr><tr><td>Lysimeter 005=127 liters</td><td>Lysimeter 012=91 liters</td></tr><tr><td>Lysimeter 006=120 liters</td><td>Lysimeter 013=93 liters</td></tr><tr><td>Lysimeters 007=131 liters</td><td>Lysimeter 014=75 liters</td></tr></tbody></table>		Lysimeter 004=201 liters	Lysimeter 011=167 liters	Lysimeter 005=127 liters	Lysimeter 012=91 liters	Lysimeter 006=120 liters	Lysimeter 013=93 liters	Lysimeters 007=131 liters	Lysimeter 014=75 liters
Lysimeter 004=201 liters	Lysimeter 011=167 liters								
Lysimeter 005=127 liters	Lysimeter 012=91 liters								
Lysimeter 006=120 liters	Lysimeter 013=93 liters								
Lysimeters 007=131 liters	Lysimeter 014=75 liters								
Summary Meetings and Discussions Held or Attended, including Job Safety:									
N/A									
Comments:									
N/A									
Additional Documentation Submitted:									
N/A									
Sign Off:									
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro								
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 09:13:06 -0600								
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro								
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, inc. Date: 2025.09.03 13:51:16 -0600								



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: WW and Elite Waterproofing	Project: ICS
Task: maintenance	Date: 6-17-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Weed Wranglers began the annual herbicide application for ICS. Prohibited plants were spot sprayed as identified in the field using the herbicides Escort XP, Telar, and Tordon. Thistles, yucca, and other prohibited plants were targeted. Navarro personnel met with Elite Waterproofing to get a cost estimate for replacing the caulk in the concrete lined channels on ICS and Basin F. Elite suggested to remove the caulk in all of the concrete lined channels and replace with new due to aging and deterioration.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 09:23:58 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, inc. Date: 2025.09.03 13:53:34 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: Weed Wranglers	Project: ICS
Task: maintenance	Date: 6-18-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Weed Wranglers continued to spray prohibited plants on ICS as they were identified using the herbicides Escort XP, Telar, and Tordon. Navarro personnel pumped the standing water from inside Lysimeter 015 and 99 liters were removed.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 09:29:29 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc. Date: 2025.08.03 13:54:33 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: Weed Wranglers	Project: ICS
Task: herbicide	Date: 6-19-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Weed Wranglers completed the task of spot spraying prohibited plants on ICS. Herbicides applied are Escort XP, Telar, and Tordon.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 09:31:51 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com, c=US, ou=Navarro Research and Engineering, o=Navarro Date: 2025.09.03 13:55:05 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: N/A	Project: ICS
Task: maintenance	Date: 7-1-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
The cap to ER60 was affixed back to the erosion/settlement monument shaft. This monument was observed to be damaged during the April 2025 Type II inspection and was most likely damaged during revegetation efforts performed in October of 2024.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 09:34:44 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, inc. Date: 2025.09.03 13:56:34 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: USFWS	Project: ICS
Task: maintenance	Date: 7-21-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
USFWS noticed a bison on ICS on Saturday, July 19. The bison appeared to have entered the cover at the west cattleguard (Lime Basins, Gate O). USFWS mobilized and quickly removed the bison off the cover and closed a nearby gate (Gate N). No damage to the cover or perimeter fence was observed.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 09:38:33 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc. Date: 2025.09.03 13:57:29 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: N/A	Project: ICS
Task: maintenance	Date: 7-31-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
The ICS perimeter fence was breached by bison activity on the southeast corner near 7th Ave. Navarro personnel repaired the split fence fabric, so that no further animal activity could access the cover. A fence T-post needs to be straightened and the top three splices of split fence fabric need to be united. This activity will continue on August 4.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 09:42:14 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc. Date: 2025.09.03 13:58:25 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: N/A	Project: ICS
Task: maintenance	Date: 8-4-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Navarro personnel finished repairing the ICS perimeter fence from the bison breach on 7-31-25. The top three strands of fence fabric were spliced back together and the bent T-post was straightened. All fence fabric was secured.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 10:00:20 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc. Date: 2025.09.03 13:59:01 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: N/A	Project: ICS
Task: maintenance	Date: 8-13-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Navarro personnel repaired the ICS fence south of the east cattleguard (Shell/CAT). A T-post was knocked down and the fence fabric was torn away. A new T-post was installed and the fence fabric was secured. The damage was likely due to bison activity. The fence fabric was intact so no bison activity is suspected on the cover.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 10:03:33 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc. Date: 2025.09.03 13:59:56 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: Weed Wranglers	Project: ICS
Task: herbicide	Date: 8-25-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Weed Wranglers began spraying cheatgrass areas on ICS using the herbicide Rejuvra.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 10:07:22 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, inc. Date: 2025.09.03 14:00:38 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: Weed Wranglers	Project: ICS
Task: herbicide	Date: 8-26-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Weed Wranglers completed applying herbicide to cheatgrass areas on ICS using the herbicide Rejuvra.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 10:10:32 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, Inc. Date: 2025.09.03 14:01:22 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: N/A	Project: ICS
Task: maintenance	Date: 8-27-25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Navarro personnel graded the west perimeter road.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by Kim Hoffman DN: cn=Kim Hoffman, o=Navarro Research and Engineering, ou, email=hoffman@navarro-inc.com, c=US Date: 2025.08.29 10:12:28 -0600
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by Michael W. Jones DN: cn=Michael W. Jones, email=jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering, inc. Date: 2025.08.03 14:01:51 -0600



CONTRACTOR DAILY QUALITY CONTROL REPORT

Project Information	
Subcontractor: N/A	Project: ICS
Task: inspection	Date: 9/24/25
Weather AM: acceptable	Weather PM: acceptable
Activities Inspected and Observed:	
Navarro personnel performed a drive around inspection on hardened surfaces after the RMA received 1.27" of rain on 9/23/25. No observations were noted.	
Summary Meetings and Discussions Held or Attended, including Job Safety:	
N/A	
Comments:	
N/A	
Additional Documentation Submitted:	
N/A	
Sign Off:	
Inspector Name: Kim Hoffman	Title/company: Site Inspector/Navarro
Signature and Date: Kim Hoffman	Digitally signed by: Kim Hoffman DN: CN = Kim Hoffman email = hoffman@navarro-inc.com C = US O = Navarro OU = Navarro Date: 2025.10.08 08:44:46 -06'00'
Reviewer Name: Michael W. Jones	Title/company: Task Manager/Navarro
Signature and Date: Michael W. Jones	Digitally signed by: Michael W. Jones DN: CN = Michael W. Jones email = jonesm@navarro-inc.com C = US OU = Navarro Research and Engineering Date: 2025.10.08 16:17:58 -06'00'

APPENDIX E

Non-Routine Action Plans

NRAP Number	NRAP-2024-002																																													
Applicable Design(s)	☐ SDT Remediation Project RCRA-Equivalent Cover Construction – Record Documents ☒ ICS Design Project – Record Documents ☐ Basin F/Basin F Exterior Remediation Project – Part 2 (Basin F Cover) – Record Documents																																													
Applicable Design Document(s)	☐ Drawing Number/Title/Revision: ☐ Spec. Number /Title/Revision: ☒ Plan Title/Revision: RCRA-Equivalent, 2-, and 3-Foot Covers Long-Term Care Plan (LTCP), Revision 3																																													
Description of the Condition Requiring Action	During the Type I inspection of the Integrated Cover System (ICS) performed on October 2, 2024, the cover soil thickness loss measurement at erosion/settlement monument ER76 was 4.0 inches. According to Section 3.5 and Table 3.2-2 of the LTCP, an erosion/settlement monument measurement in excess of three inches requires regulatory agency notification and triggers the consultative process. This NRAP has been prepared in accordance with Section 3.5.3 of the LTCP to document the outcome of the consultative process.																																													
Description of the Action	Evaluation: Cover soil thickness loss is measured at each erosion/settlement monument semiannually in April and October. During the inspection of the ICS performed on October 2, 2024, cover soil thickness loss at erosion/settlement monument ER76 was 4.0 inches. Monument ER76 is located in the eastern portion of the South Plant 3-Foot Cover. Refer to Figure 1 for a site map showing the general area of ER76 within the ICS. Soil Thickness Loss Measurements at ER76 Since cover construction was completed in 2011 soil loss measurements at ER76 have varied from 1.0 inches, up to 4.0 inches, as shown on the chart below. The measurement collected in October of 2024 was the first that exceeded 3.0 inches. ER76 Soil Loss Measurements South Plants 3-Foot Cover <table><thead><tr><th>Year</th><th>Spring (inches)</th><th>Fall (inches)</th></tr></thead><tbody><tr><td>2011</td><td>1.0</td><td>1.0</td></tr><tr><td>2012</td><td>1.0</td><td>1.0</td></tr><tr><td>2013</td><td>1.0</td><td>1.0</td></tr><tr><td>2014</td><td>1.0</td><td>1.0</td></tr><tr><td>2015</td><td>1.0</td><td>1.0</td></tr><tr><td>2016</td><td>1.0</td><td>1.0</td></tr><tr><td>2017</td><td>1.0</td><td>1.0</td></tr><tr><td>2018</td><td>1.0</td><td>1.0</td></tr><tr><td>2019</td><td>1.0</td><td>1.0</td></tr><tr><td>2020</td><td>1.0</td><td>1.0</td></tr><tr><td>2021</td><td>1.0</td><td>1.0</td></tr><tr><td>2022</td><td>1.0</td><td>1.0</td></tr><tr><td>2023</td><td>1.0</td><td>1.0</td></tr><tr><td>2024</td><td>1.0</td><td>4.0</td></tr></tbody></table> Surface Conditions Near ER76 Measurements are collected on the north side of each monument, in accordance with LTCP Standard Operating Procedure 001, to ensure consistency across the monitoring system and between monitoring events. Field conditions around monument ER76 were evaluated during the cover inspection on October 2, 2024. During this inspection, it was evident that the soil loss is due to rodent activity, primarily on the north side of the monument. In addition to the small	Year	Spring (inches)	Fall (inches)	2011	1.0	1.0	2012	1.0	1.0	2013	1.0	1.0	2014	1.0	1.0	2015	1.0	1.0	2016	1.0	1.0	2017	1.0	1.0	2018	1.0	1.0	2019	1.0	1.0	2020	1.0	1.0	2021	1.0	1.0	2022	1.0	1.0	2023	1.0	1.0	2024	1.0	4.0
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	rodent hole on the north side of the monument, rodent activity was visible from the south and west aspects of the monument. There was no additional erosion or settlement observed at, or around, the monument. The attached photos show the rodent hole and measurements around the monument in the four cardinal directions. <u>Conclusions</u> Based on observations made during the field inspection performed in October of 2024, there is no indication of erosion either near monument ER76 or in the general area of the RCRA-equivalent cover that is represented by the monument. The soil thickness loss is localized erosion around the monument itself, which is understandable considering the rodent activity. Recommended Action: Since the loss of cover soil thickness is a localized issue around the monument itself, the depression around the west and south aspects of the monument and hole on the north side of the monument will be filled with cover soil to a level that is representative of the surrounding area. A straight edge will be used to span the affected area and provide guide to prevent overfilling the area. Adding one to two inches of soil around the monument will prevent ponding in the localized erosion and animal hole and return the soil thickness loss measurement at ER76 to its historical range. Bare soil in the repair area will be compacted with foot traffic and hand seeded. The repaired area will be inspected to ensure a visually even surface that drains and prevents ponding.	
	Material Requirements: Cover soil from the long-term cover soil stockpile and seed consistent with cover requirements.	
	Performance Criteria: None	
	Does the action deviate from the requirements of the applicable design package(s)? ☐ Yes ☒ No If so, provide rationale for the deviation from the design package(s). Rationale:	
Closeout Requirements	Is a multi-Agency post-action inspection required? ☐ Yes ☒ No Are modifications to monitoring or inspection frequencies required? ☐ Yes ☒ No Others: _____	
Consultation Record	Consultation Date: October 4, 2024 (email) and October 23, 2024 (meeting) Consultation Method: Notification email and Landfills and Covers O&M status meetings. Consulted Parties: EPA, CDPHE, ACHD	
Attached Exhibits	☐ None ☐ Inspection Form(s) ☐ Map of Affected Area ☐ Correspondence	☐ Supplemental Work Plan(s) ☐ Rationale for Deviation From Design ☐ Modified Inspection Frequencies ☒ Others: Photo 1: North Measurement Photo 2: South Measurement Photo 3: East Measurement Photo 4: West Measurement Photo 5: ER76 Photo 6: Animal Hole on North of ER Monument

		Figure 1: Location of ER76
Approvals <i>Signature indicates the Parties are in consensus and concur with the proposed action and closeout requirements.</i>		
Cover Manager, or Designee Signature & Date: Digitally signed by: Michael W. Jones DN: CN = Michael W. Jones email = jonesm@navarro-inc. com C = US OU = Navarro Research and Engineering, Inc. Date: 2024.10.29 15:51:33 -06'00' Michael W. Jones		Army Project Manager, or Designee Signature & Date: Digitally signed by Cable, Kelly DN: cn=Cable, Kelly, ou=USCMC1, email=kelly.cable@aecom.com Date: 2024.11.04 10:08:38 -07'00' Cable, Kelly
EPA Signature & Date: Digitally signed by RACHEL PUTTMANN Date: 2024.11.04 09:24:09 -07'00' RACHEL PUTTMANN	CDPHE Signature & Date: Digitally signed by Collar, Mark Date: 2024.11.04 13:47:43 -07'00' Collar, Mark	ACHD Signature & Date: Digitally signed by Joseph Chisholm Date: 2024.11.04 15:20:24 -07'00' Joseph Chisholm

ER76 measurements

1: ER76 measured on north side 4.0"



2: ER76 measured on south side 2.75"



ER 76 measurements

3: ER 76 measured east side 1.75”



4: ER 76 measured west side 3.75”



ER 76 measurements

5: ER 76



6: ER 76 animal hole north side of monument

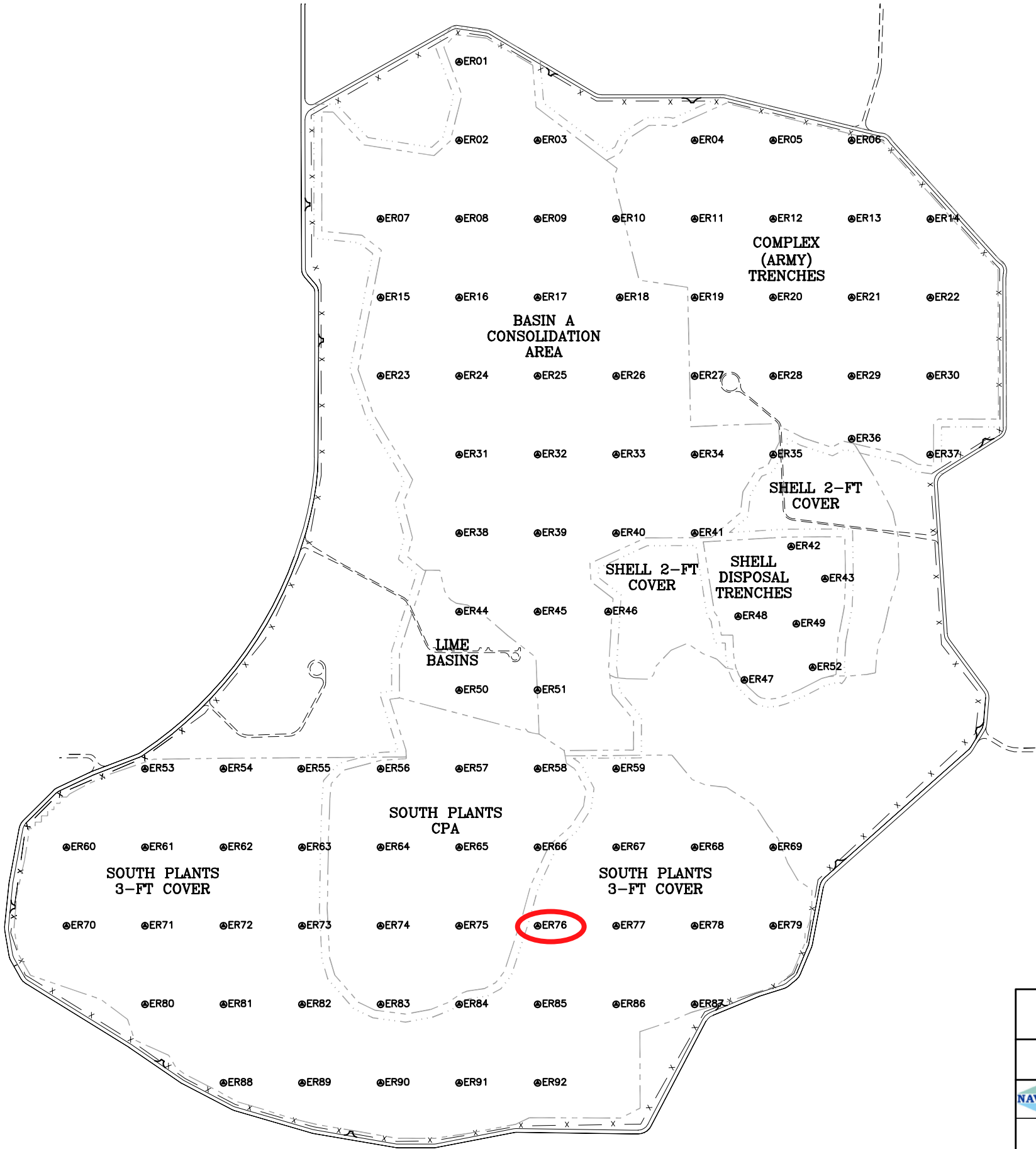


LEGEND

- COVER BOUNDARY
- BIOTA BARRIER MATERIAL BOUNDARY
- WELL ACCESS ROAD
- PERIMETER FENCE
- ARMY MAINTAINED AREA BOUNDARY
(SEE NOTE)
- ER43

EROSION MONUMENT

NOTE: THE OUTSIDE SHOULDER OF THE ACCESS ROAD DEFINES THE ARMY MAINTAINED AREA BOUNDARY.





Program Manager
Rocky Mountain Arsenal
U.S. ARMY
COMMITTED TO PROTECTION OF THE ENVIRONMENT

ROCKY MOUNTAIN ARSENAL
COMMERCE CITY, COLORADO



NAVARRO
Research and Engineering, Inc.

PROJECT NAME
LONG-TERM CARE PLAN

TITLE
ICS MONUMENT PLAN
SHEET 2 OF 2

CAD FILE:
FIG SOP 001-3 ER.dwg

DATE
06.21.21

FIGURE NUMBER
SOP 001-3