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October 16, 2019

Cannabis Services Division
Humboldt County Planning and Building Department
3015 H Street
Eureka CA, 95501

Dear Planner,

Re: APN 208-241-017
Application #11737

This letter is in response to Department Policy Statement No. 16-002, which states, *"If a workable alternative cultivation site exists on a parcel and its relocation will bring the cultivation into compliance with performance standards of the CMMLUO, this approach could meet the objectives of the CMMLUO provided it is the environmentally superior option."*

As a Third-Party representative to the Water Board, Timberland Resource Consultants recommends relocating the two northern most cultivation areas which consist of ML #2, OD #2, ML #3, and OD #3 to the Proposed Relocation Site as shown on the attached Cultivation Relocation Maps.

The Proposed Relocation Site is a superior location as compared to the northern most cultivation areas for the reasons detailed below;

1. The Proposed Relocation Site is environmentally superior because it is outside of the riparian buffer zones. The project was previously enrolled in Water Board Order No. 2015-0023 and is therefore grandfathered into the setbacks required by this order. Water Board Order No. 2015-0023, Standard Condition (I)(A)(3)(a), states that *"While 200 foot buffers are preferred for Tier 2 sites, at minimum, cultivation areas and associated facilities shall not be located or occur within 100 feet of any Class I or II watercourse or within 50 feet of any Class III watercourse or wetlands"*. Cultivation areas labeled ML #2 and OD #2 located in the northeast corner of the property are approximately 60-feet from the Class II watercourse. Cultivation areas labeled ML #3 and OD #3 located in the north central portion of the property are approximately 30-feet & 20-feet from two Class III watercourses. The Proposed Relocation Site which is located in the center of the property is located approximately 100+ feet from the nearest Class II watercourse.
2. Relocating the two northern cultivation areas will allow for the removal and proper disposal of plastic water-line that previously ran up the hill. Shorter water lines will reduce the possibility of water leaks and erosion. Additionally, condensing the two northern locations into one preexisting cultivation area (ML #5 & OD #7) will reduce the transport of cultivation related materials throughout the property and allow for approximately 23 water storage tanks to be relocated to a more central location.

The Cultivator is now subject to State-wide Order WQ 2019-0001-DWQ. The Cannabis Policy provides criteria to evaluate the threat to water quality based on site conditions. The threat is risk-based based upon:

- a. Disturbed area
- b. Slope of disturbed area
- c. Proximity to surface water body

The two northern most cultivation areas which consist of ML #2, OD #2, ML #3, and OD #3 are classified as "High Risk" to water quality due to the disturbed area being located within the riparian setbacks. The Proposed Relocation Site is classified as a "Low Risk" to water quality based on slope and compliance with the setback requirements for surface water.

Restoration Plan

Once relocation is approved, decommissioning and remediation of ML #2, OD #2, ML #3, and OD #3 will occur. The Cultivator shall remove all cultivation related infrastructure and material. Trash, refuse, and solid waste shall be disposed of at an appropriate waste disposal location. Native grasses surround the cultivation site and will eventually spread vegetatively through rhizomes below the soil, and via seed production. However, revegetation of the site with native grasses is recommended per the following Revegetation Plan. Timberland Resource Consultants has been retained to prepare the Site Management Plan, which will further assess and address restoration of the sites and potential decommissioning of the access roads leading to them.

Revegetation Plan

Reseeding Methods: Reseeding is key to site restoration, especially at sites where understory vegetation or topsoil has been removed. Grasses are fast-growing and quickly provide vegetative cover to protect exposed soils from erosion. Native grasses are typically better adapted to site-specific climate and environmental conditions. Though reseeding is a simple practice, timing is important. Seeds should be planted during the wet seasons so soils are viable for seed germination. Planting during hot summer or early fall months can deprive seeds of necessary moisture.

Recommendation: Reseed the decommissioned cultivation site and all additional areas of disturbed soil with a native grass seed mix. Manually distribute seed mix evenly across the site during late fall, winter, or early spring and follow any specific instructions accompanying seed mix. No equipment use or seed burial is required. Some areas will have begun to naturally revegetate; if a given area has more than 75% ground cover, no reseeding is necessary. Though the seed mix may vary, the RPF recommends the following:

Native Erosion Control Mix

Species Content:

- Bromus carinatus, California Brome
- Elymus glaucus, Blue Wildrye
- Festuca microstachys, Small Fescue
- Trifolium willdenovii, Tomcat Clover

"This grass mixture features California native grasses that are acclimated to varying conditions around

our state. Typically, this mix will grow 2 to 3 ft tall given normal soil conditions and normal rainfall patterns. On shallow soils, there is potential for vegetative cover if there is adequate resources to sustain 24 to 36 inches of annual reseeding vegetation. This mix can be modified with the addition of other species including wildflowers."

This seed mix can be purchased from Pacific Coast Seed in Livermore, California, on the following website: <http://store.pcseed.com/product/UNative-Erosion-Control-Mix.aspx>

Straw Mulching: Straw mulching can be used to protect newly sown seeds from wind and high precipitation events as well as stabilize exposed soils. Humboldt County proposes straw mulching all areas of disturbed soils to prevent potential erosion.

Recommendation: After reseeding, apply straw mulch to the decommissioned cultivation site and all additional areas of disturbed soil at one bale per 800 square feet. Some areas will have begun to naturally revegetate; if a given areas has more than 75% ground cover, no mulching is necessary. See NRCS Straw Mulching guidelines for more instructions.

Sincerely,



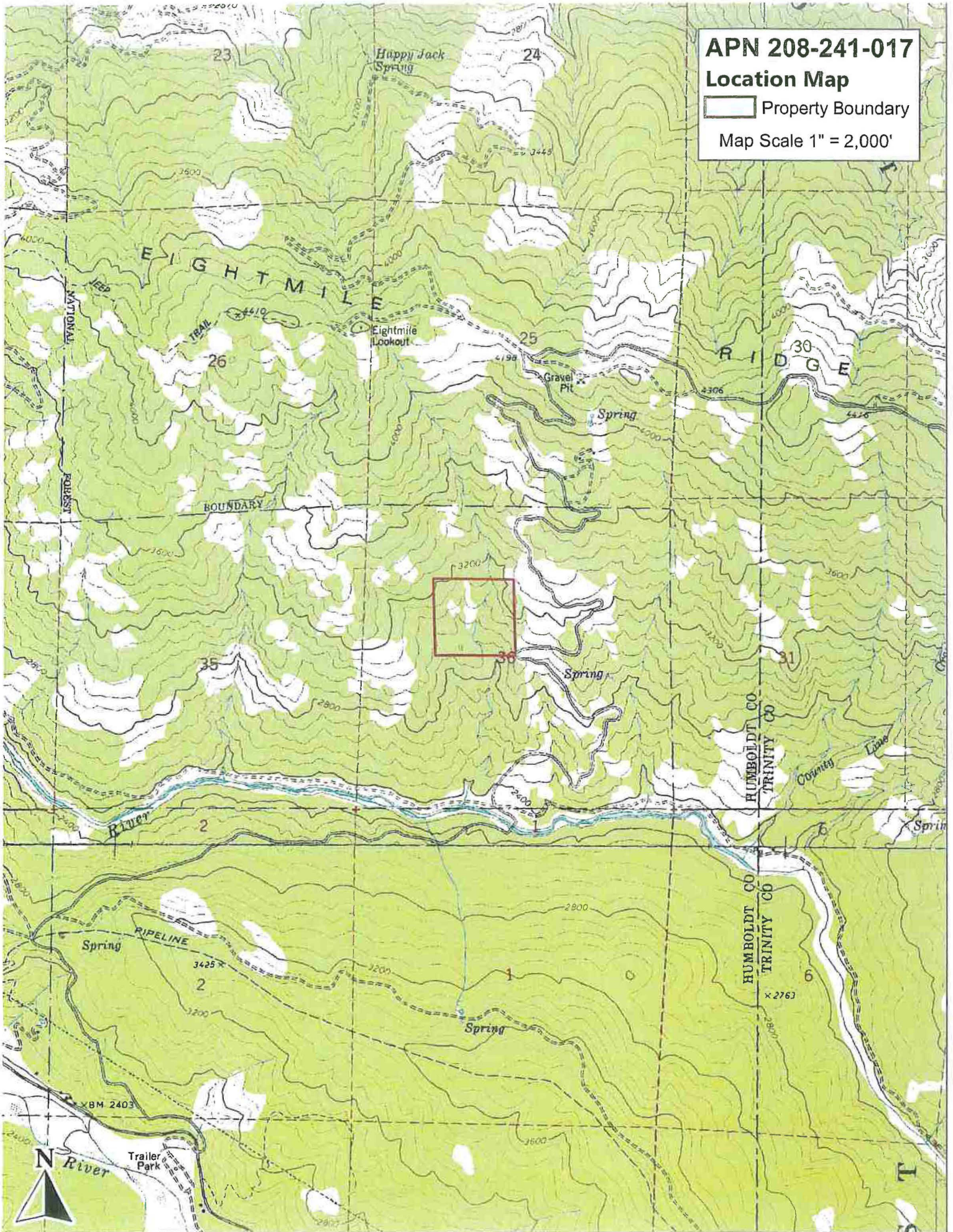
Chris Carroll, RPF #2628
Timberland Resource Consultants

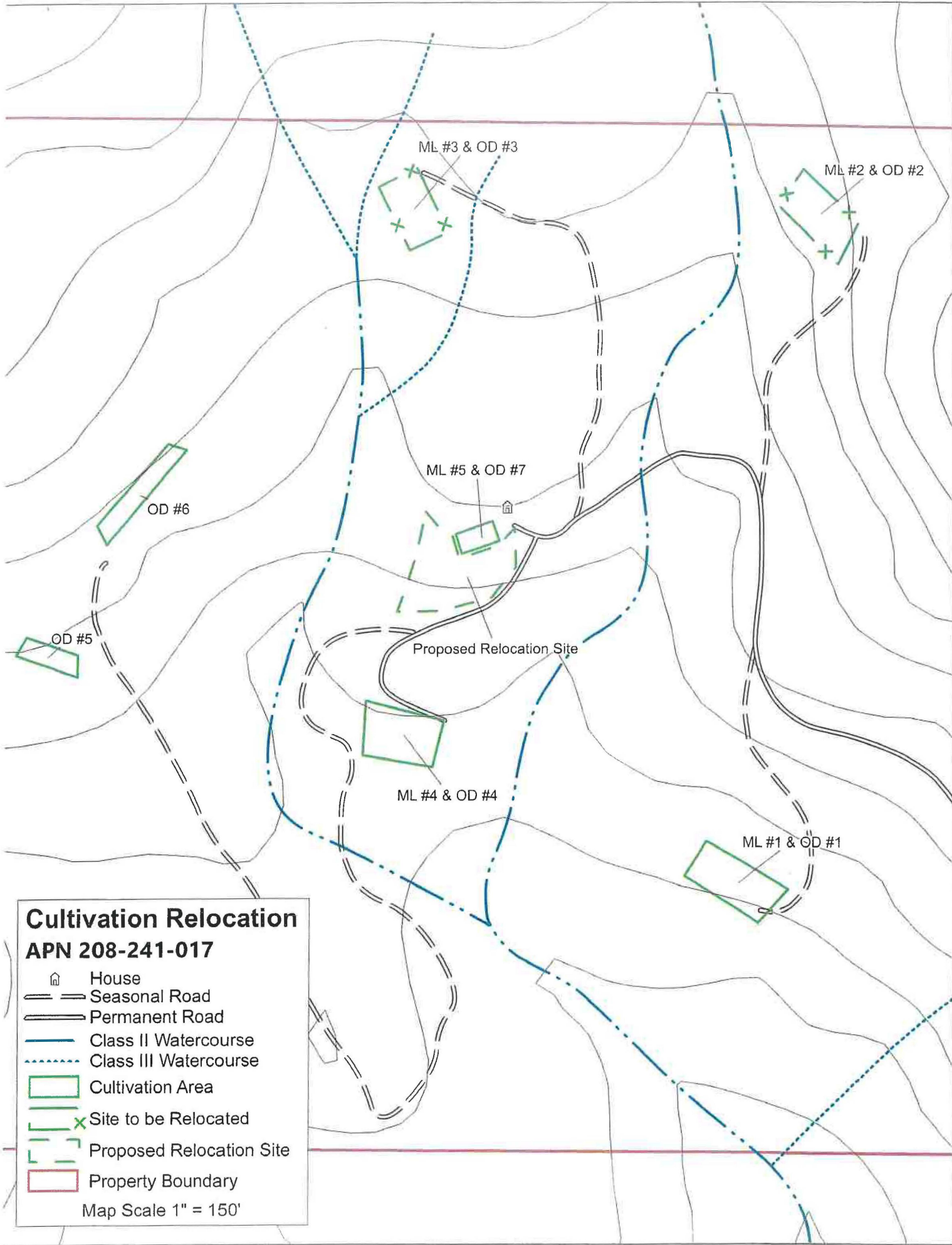
APN 208-241-017

Location Map










Property Boundary

Map Scale 1" = 2,000'

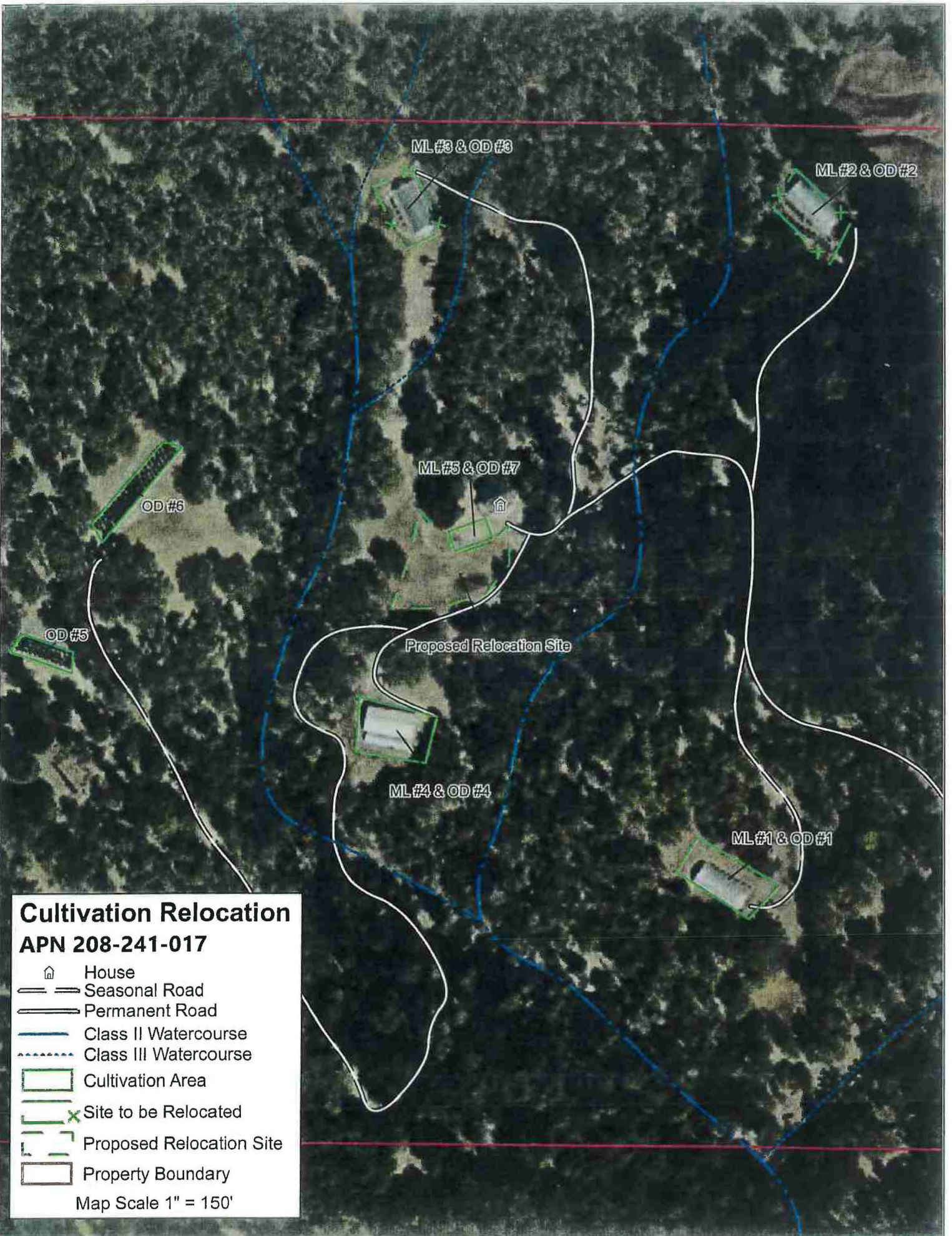




**Cultivation Relocation
APN 208-241-017**

-  House
-  Seasonal Road
-  Permanent Road
-  Class II Watercourse
-  Class III Watercourse
-  Cultivation Area
-  Site to be Relocated
-  Proposed Relocation Site
-  Property Boundary

Map Scale 1" = 150'



ML #3 & OD #3

ML #2 & OD #2

OD #6

ML #5 & OD #7

OD #5

Proposed Relocation Site

ML #4 & OD #4

ML #1 & OD #1

Cultivation Relocation

APN 208-241-017

- 🏠 House
- 🛤️ Seasonal Road
- 🛣️ Permanent Road
- 🌊 Class II Watercourse
- 🌊 Class III Watercourse
- 🟩 Cultivation Area
- 🟩✂️ Site to be Relocated
- 🟩🏠 Proposed Relocation Site
- 🟩 Property Boundary

Map Scale 1" = 150'