

**ATTACHMENT 4C**  
**TIMBER RESTOCKING PLAN**



165 South Fortuna Boulevard, Fortuna, CA 95540  
707-725-1897 • fax 707-725-0972  
trc@timberlandresource.com

January 18, 2019

Nor Cal 420 Patient Collective, Inc.  
Attention: John Moreno  
P.O. Box 1104  
Ruth, CA 95526

Dear John,

Re: APN 210-101-011  
Application #12778

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 numerous historic cultivation sites to a centrally located cultivation area as shown on the attached WRPP Site Maps. Specifically, the cultivation sites depicted as Abandoned Cultivation Area on the WRPP Maps shall be relocated to the footprint of the large grassy opening depicted Active Cultivation Area. The Abandoned Cultivation Areas are geographically situated in two distinct areas; (1) ten sites located south of the off-stream pond and (2) two sites located north of the Campsite/Camp trailer.

The Active Cultivation Area is superior to the Abandoned Cultivation Areas for the following reasons detailed below;

1. The Abandoned Cultivation Areas located south of the off-stream pond do not comply with Water Board Order No. 2015-0023, Standard Condition (I)(A)(3)(a), which 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"*.

All of the sites are located within 200 feet of surface water. A majority of the sites are located in the buffer zone of Class I, II, III watercourses, a Class II spring, and a wetland (pond). The development of the sites located within the various buffer zones resulted in the removal of native vegetation, which is in violation of Standard Condition (I)(A)(3)(b). Due to the loss of native vegetation and proximity of cultivation to surface water, the various buffer zones are of an insufficient width to filter wastes from runoff discharging from the sites, which is in violation of Standard Condition (I)(A)(3)(c). In some cases, nutrients are potentially hydrologically connected to surface waters, which is in violation of Standard Condition (I)(A)(7)(c). Beginning July 2019, the Cultivator will no longer be covered under

Water Board Order No. 2015-0023 and will be subject to State-wide Order WQ 2017-0023-DWQ. The buffer zones for the Class I Watercourse, spring and wetland will increase resulting in nearly all sites being located within a riparian setback. The Active Cultivation Area in contrast is not located within 200 feet of surface water or any riparian setback.

2. Several of the Abandoned Cultivation Areas located south of the off-stream pond involve stream crossings. The stream crossings are not maintained so as to prevent or minimize erosion from exposed surfaces adjacent to, and in the channel and on the banks, which is not in compliance with Standard Condition (I)(A)(2)(d). Furthermore, the segment of seasonal road from the off-stream pond south to its terminus near the Little Van Duzen River contains numerous controllable sediment discharge sites. The crossings and sediment sites will need to be corrected per the WRPP regardless of whether cultivation activities occur nearby. However, discontinuing or significantly reducing road use in this sensitive area is expected to lower future sediment inputs. The Active Cultivation Area in contrast involves no stream crossings, and the site is closer to Highway 36, which lowers the amount of road needed to be used and maintained.
3. The northern-most Abandoned Cultivation Areas are located in a forest setting and appear to have been converted between 2014 and 2016 from small grassy forest openings to an outdoor cultivation sites. The small forest openings likely consisted of conifer and hardwood encroachment typical of the natural succession occurring throughout oak woodlands and natural grassland areas within this geographic area. Development of these areas for cannabis cultivation would constitute a timberland conversion per the Forest Practice Act and Rules, and a timberland conversion permit issued by Cal Fire would have been required. Relocation from the forest to the grassy opening is recommended to minimize impacts to biological resources, and to encourage future forest management on the ownership. Removal of cultivation from the forest and restoration in the form of replanting conifers will maximize the production or maintenance of forests which are healthy and naturally diverse, with a mixture of trees and under-story plants.
4. Beginning July 2019, the Cultivator will no longer be covered under Water Board Order No. 2015-0023 and will be subject to State-wide Order WQ 2017-0023-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 a surface water body

The Abandoned Cultivation Areas proposed to be relocated are classified as a “High Risk” to water quality. A cannabis cultivation site is classified as high risk if any part of the disturbed area exists within the riparian setback limits. In contrast, the Active Cultivation Areas, which are composed of five sites as shown on the attached WRPP Site Maps, are located on slopes ranging from 5% to 25% with an average slope steepness of 11%. The Active Cultivation Areas are classified as a “Low Risk” to water quality based on slope and compliance with the setback requirements for surface water.

Prior to July 2019, the Cultivator wishes to obtain “Tier 1 Status” (Dischargers cultivate cannabis commercially outdoors and have a disturbed area equal to or greater than 2,000 square feet and less than 1 acre\43,560 square feet) with a “Low Risk” designation with regards to State-wide Order WQ 2017-0023-DWQ. Sites that pose a higher threat to water quality (e.g., disturb a larger area, located on a steeper slope, or located close to a surface water body) require a greater level of regulatory oversight, which translates to higher costs to achieve water quality protection. Minimizing risk by

moving the site not only results in environmental superiority, but also saves time, money and resources from preparing additional technical reports and review by the Water Board.

**Restoration:** The WRPP addresses restoration of the Abandoned Cultivation Areas. In addition to the recommendations contained in the WRPP, the RPF recommends restocking the two northernmost Abandoned Cultivation Sites per the attached Restocking Plan.

Sincerely,

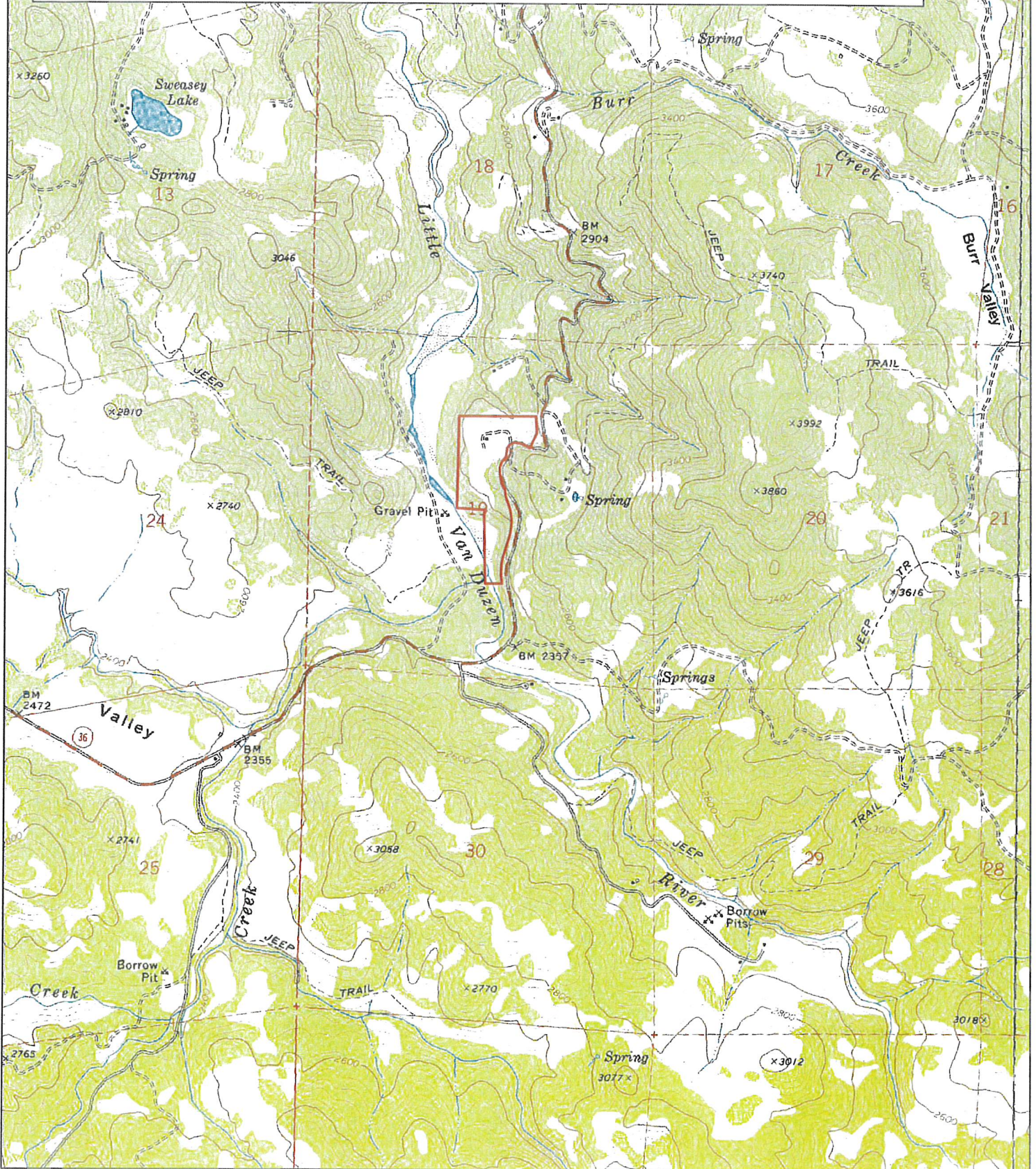


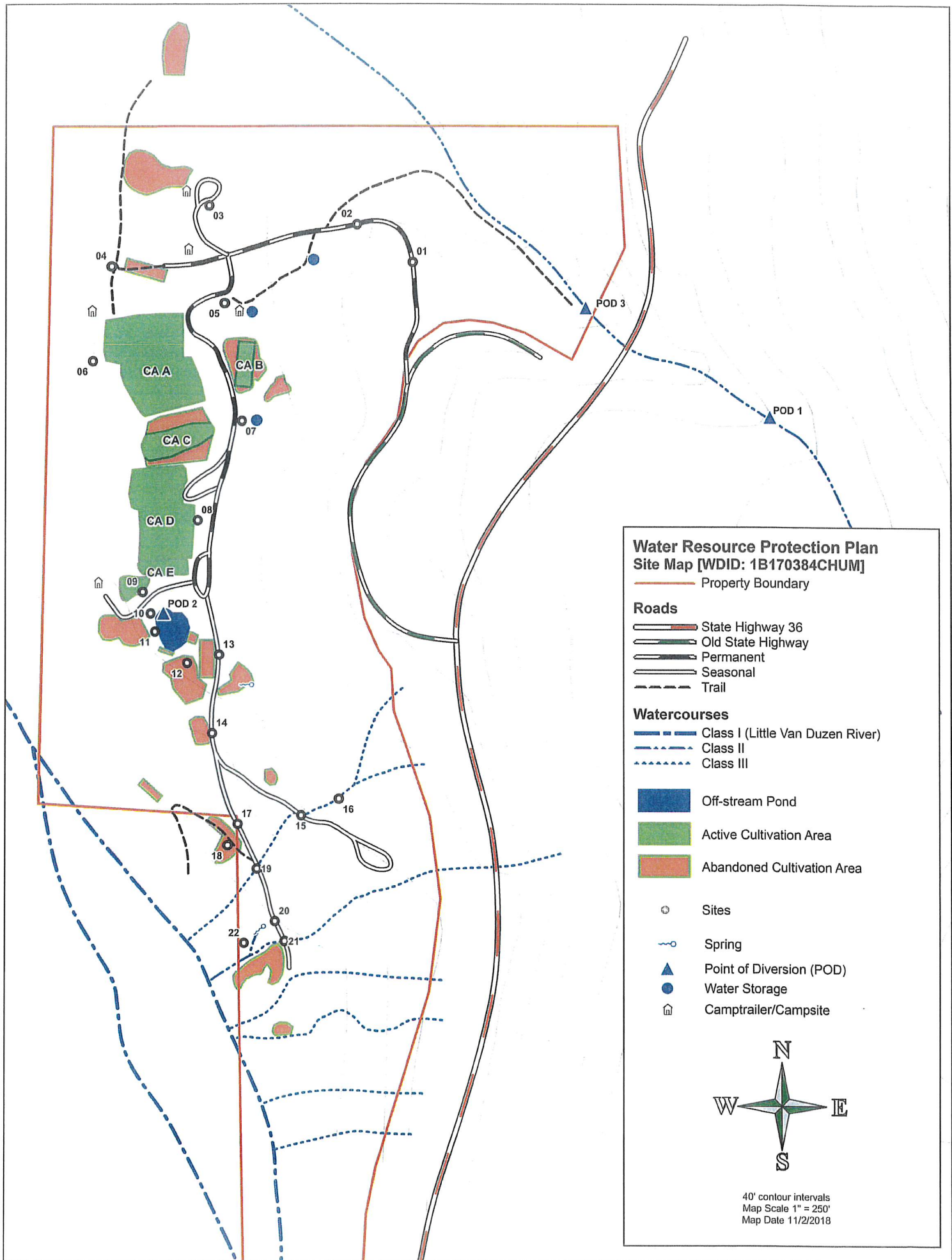
Chris Carroll, RPF #2628  
Timberland Resource Consultants

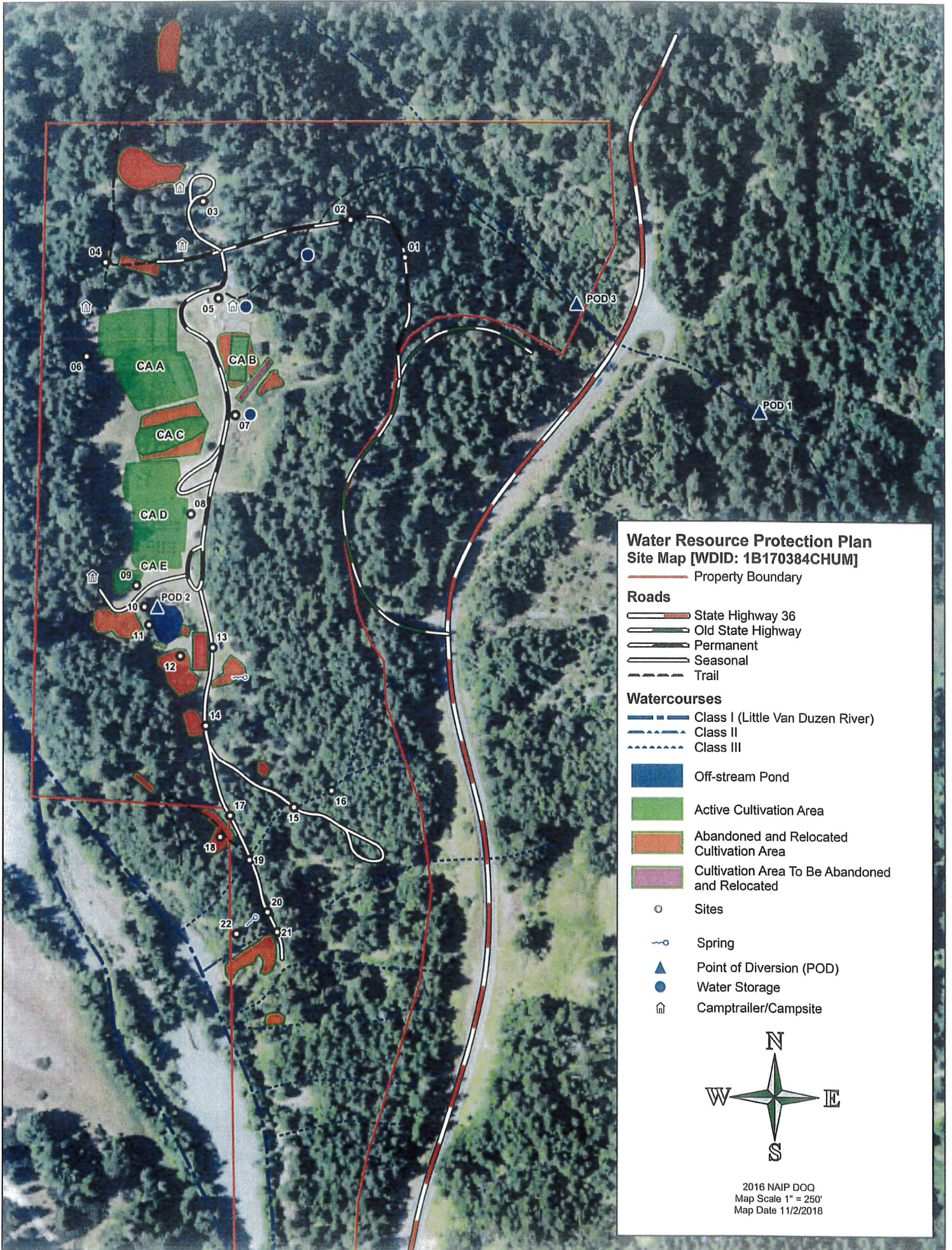
**Water Resource Protection Plan  
General Location Map [WDID: 1B170384CHUM]**

— Property Boundary

Located in Section 19, T1N, R5E, Humboldt Base & Meridian, Humboldt County, from the Larabee Valley 7.5' USGS Quad Map.  
Map Scale 1" = 2,000'  
Map Date 11/2/2018







**Water Resource Protection Plan  
Site Map [WDID: 1B170384CHUM]**

- Property Boundary
- Roads**
  - State Highway 36
  - Old State Highway
  - Permanent
  - Seasonal
  - Trail
- Watercourses**
  - Class I (Little Van Duzen River)
  - Class II
  - Class III
- Off-stream Pond
- Active Cultivation Area
- Abandoned and Relocated Cultivation Area
- Cultivation Area To Be Abandoned and Relocated
- Sites
- Spring
- Point of Diversion (POD)
- Water Storage
- Camptrailer/Campsite



2016 NAIP DOQ  
Map Scale 1" = 250'  
Map Date 11/2/2018



**RESTOCKING PLAN**  
**FOR**  
**APN 210-101-011**

January 18, 2019

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



## Regeneration Plan

Site Preparation: Site preparation is a widely used method to facilitate the establishment of a desirable stand of trees. Site preparation activities remove or reduce competing vegetation, reduce or remove unwanted trees and logging debris, and prepare the soil to promote the growth and survival of desired tree species. There are many methods of site preparation that fall under either chemical or mechanical site preparation. The primary objective is to have an area suitable for planting and establishing a new stand of trees. Subsoiling/ripping is a mechanical site prep method for heavy soils on cutover or agricultural lands that have a compacted layer at or below the soil surface that limits root growth and development. Subsoiling/ripping increases aeration and water-holding capacity of compacted soils and breaks up root restricting hardpans and/or traffic pans.

Planting: The RPF recommends planting Douglas-fir at a spacing no less than 10 feet by 10 feet or 435 trees per acre. If deer browsing is expected (landowner's local knowledge), then the density can be slightly increased to account for mortality and/or damage. The two areas to be planted are approximately 0.30 acres in size, which would require a minimum 130 tree seedlings.

Seedlings: Most conifer seedlings that come from the nursery are usually available in two forms; bareroot seedlings and containerized seedlings. Bareroot seedlings are essentially stock whose roots are exposed at the time of planting. Bareroot seedlings are grown in nursery seedbeds and lifted from the soil in which they are grown to be planted in the field. Containerized seedlings are grown in a variety of hard-walled vessels or in peat pots from seed. Given the conditions of the site and the higher survival rate associated with containerized stock, the RPF recommends using containerized seedlings if available. Seedling care and handling is extremely important to ensure post planting survival. For long-term storage (more than 3 days) store at 33-36 degrees Fahrenheit. For short-term storage (several hours to less than 3 days) store below 42 degrees Fahrenheit. At the planting site take care to not let the roots dry out and avoid exposure to the sun or warmer temperatures.

### Planting Instructions:

1. Tree planting shall only occur in winter or early spring. Tree planting should not occur if the ground is frozen, or during unusually warm periods.
2. Dig a hole at least one inch deeper and wider than the seedling roots. If planting from a container, dig the hole an inch deeper and wider than the container.
3. Place the seedling into the hole taking care not to bend the taproot, or main vertical root, and cover with soil.
4. Pack the soil down firmly around the seeding to remove any air pockets.
5. See Appendix A-D for illustrations for correct planting techniques.
6. The RPF recommends acquiring conifer seedlings from Green Diamond Resource Company's nursery in Korbel. Contact Glen Lehar @ 707-668-4439 or Samara Restoration at (707) 601-3478.

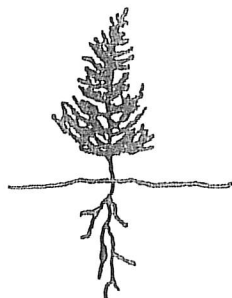
Sincerely,



Chris Carroll, RPF# 2628  
Timberland Resource Consultants

APPENDIX A

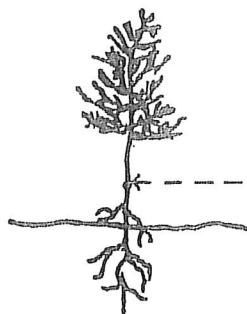
CORRECT METHOD OF SEEDLING PLANTING



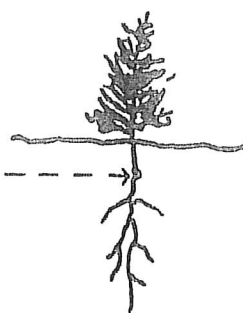
- Soil firmly packed around roots.
- No air pockets.
- Roots straight with no J or L bends.
- Root collar at or slightly below ground level.
- Root not pruned.

ERROR IN PLANTING

Too shallow



Too Deep



Root Collar

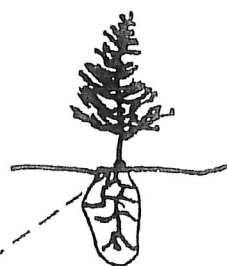
- Hole not deep enough.
- Root collar and upper roots exposed.
- Roots dry out.

- Hole is too deep.
- Root collar buried.

J or L Roots



Air Pockets



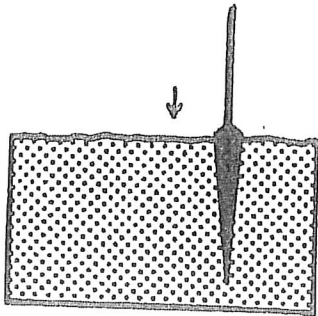
Root Collar

Hole is not deep enough — planting in rocky soil.  
 Roots cannot effectively take up water.  
 Tree not wind-firm.

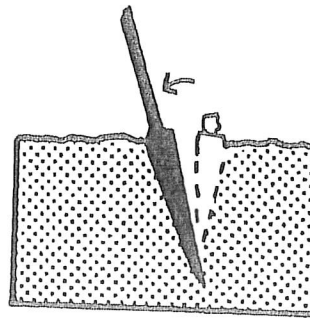
- Soil not firmly packed around roots.
- Air pocket forms.
- Roots dry out.

APPENDIX B  
PLANTING WITH A FLAT BAR

1. Insert flat bar straight down.

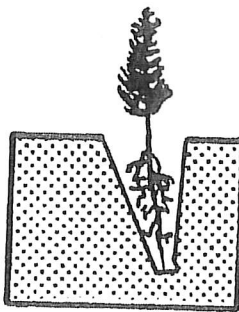


2. Pull flat bar backward to open hole.

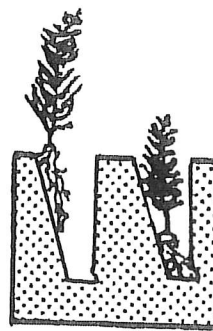


3. Remove flat bar and place seedling at correct depth with root collar at or slightly below ground level.

Correct

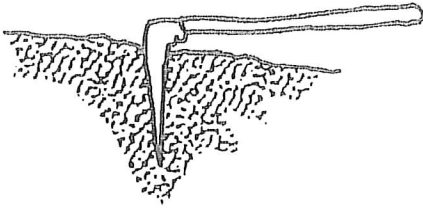


Incorrect

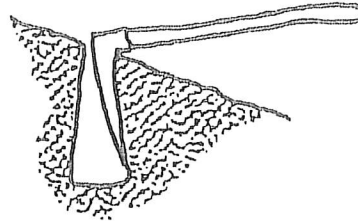


APPENDIX C  
PLANTING WITH A HOE

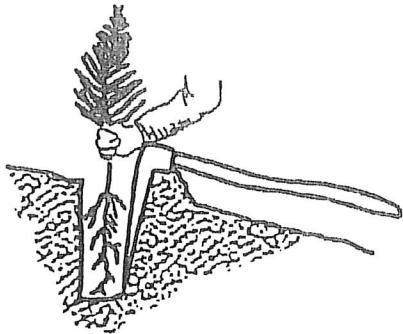
1. Swing hoe to get full penetration.



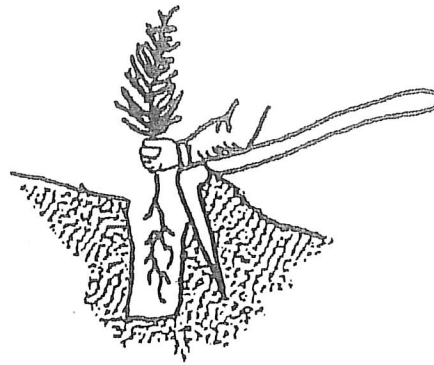
2. Lift handle and pull up to widen hole.



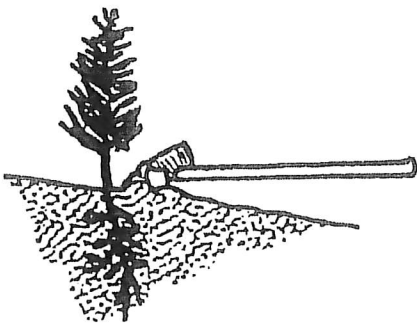
3. Place seedling while using hoe to hold back soil.



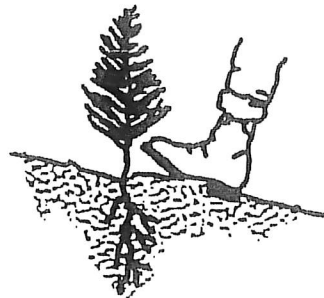
4. Use hoe to pack soil at bottom of hole.



5. Use hoe to pack soil at top hole.



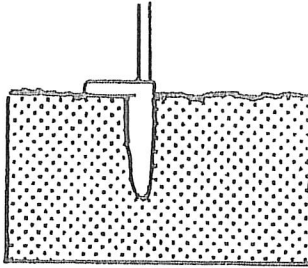
6. Firm soil around seedling with feet.



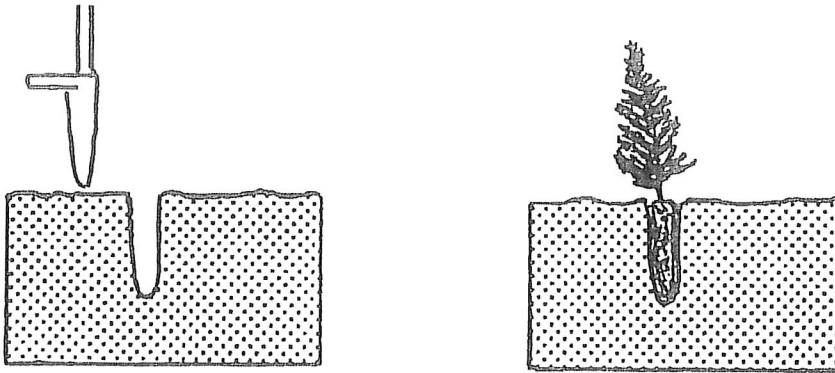
## APPENDIX D

### PUNTING WITH A PLUG BAR

1. Insert plug bar straight down until plug bar footrest is level with ground.



2. Remove plug bar and place seedling in hole.



3. Firm soil around seeding with heel of boot.

