BLAIR FORESTRY CONSULTING

Providing Professional Forestry Services

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McKinleyville, CA 95519

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EMAIL blairforestry@gmail.com

April 11, 2022

County of Humboldt
Planning and Building Department
3015 H Street
Eureka, CA 95501

Dear Humboldt County Planning Department:

The following attached documents are being submitted to satisfy the following objectives:

1.) Amend the Blair Forestry LLC Timberland Conversion Evaluation Report prepared for APN 208-221-006 on October 11, 2018, to show corrected acreage of past timberland conversion.

2.) Submit a restocking plan for the amended acreage discussed in Item 1 above.

We were contacted by landowners associated with APN 208-221-006 to prepare a restocking plan for 1.79 acres as requested in a letter dated Thursday August 12, 2021, from Humboldt County Planning and Building Department – Cannabis Services Division. Upon inspection of more recent areal imagery unavailable in 2018, it appears that the acreage of Conversion Area #3 in the Conversion Evaluation Report prepared for this landowner was inadvertently miscalculated to be 2.83 acres when the actual acreage was closer to 2.14 acres. This error was likely due to low GPS satellite availability when the site visit was conducted and lack of current imagery.

Recent imagery in the attached Conversion Evaluation Report Amendment Documents shows the area of timberland conversion at Conversion Area #3 to be 2.14 acres (0.69 acres less than estimated in the Timberland Conversion Evaluation report from 2018). We have consequently prepared a restocking plan for 1.24 acres instead of the requested 1.79 acres.

Please accept this letter as evidence that the Registered Professional Forester (RPF) has exercised due diligence in inspecting and re-evaluating the past timber conversion and making restocking recommendations based on updated conversion acreages.

Sincerely,

Thomas Blair RPF#2607

Enclosed: Conversion Evaluation Report Amendment Documents, Restocking Plan for APN 208-221-006.

Amendment Information for Timberland Conversion Evaluation Report for Kurnishon LLC; APN 208-221-006; February 1, 2022

From: Petya Ivanova <pentateka@gmail.com>
Sent: Thursday, December 2, 2021 2:32 PM
To: alex.powell@blairforestry.com
Subject: Fwd: Apps 12030- Kurnishon, LLC

---------- Forwarded message ---------
From: **Strickland, Abigail** <astrickland@co.humboldt.ca.us>
Date: Thu, Aug 12, 2021 at 2:26 PM
Subject: Apps 12030- Kurnishon, LLC
To: pentateka@gmail.com <pentateka@gmail.com>, globalwcft@gmail.com <globalwcft@gmail.com>

Hi George,

I have completed a review of your project and have the following comments and questions.

Please submit the following information:

1. Please submit a Restocking Plan from a Registered Professional Forester that references the restocking of 1.79 acres. As this is the acreage that has been converted for cannabis cultivation post-2015 baseline conditions and is currently being used for the project.

Please submit a response to the following questions in a simple word document:

2. 1. What renewable energy do you intend to obtain within the next 2 years?
3. 2. Does trimming occur onsite?
4. 3. Is the pond being used for cultivation?
5. 4. What is the domestic water source?
6. 5. Is the spring diversion being used? If so, is it for cannabis or domestic?

Please submit photos of the following:

1. The outhouse
2. Inside of each greenhouse
3. The processing building

Once the I have received this information, I can provide you with a projected hearing date! Please let me know if you have any questions.

Thank you,

Abbie Strickland
Planner - Cannabis Services Division
Planning and Building Department
(707) 445-7541
3015 H Street | Eureka, CA 95501
Email: astrickland@co.humboldt.ca.us

the field only. It appeared that some trees were removed from within the watercourse protection zone of a Class II watercourse along the eastern boundary of Conversion Area #3 during the last conversion.

See Table 1 below for a summation of conversion history on this parcel and the focus of this Timberland Conversion Evaluation.

Table 1.

Conversion Area ID	Acreage(s)	Date(s) of Completion
Conversion Area #1	0.07	After May 2016
Conversion Area #2	0.07	After August 2015 through sometime after May 2016
Conversion Area #3	0.68	Prior to May 2014
Conversion Area #3	0.4	Prior to May 2016
Conversion Area #3	1.75	Sometime after May 2016
TOTAL CONVERSION AREA	**2.97**	

Timber Stand Description

Total size of Conversion Area #3 stated in this report is 2.83 acres. Total acreage of Conversion Area #3 is actually 2.14 acres (See attached Humboldt County Web GIS Map)

The property near the conversion areas is dominated by 40 to 80-year-old Douglas-fir with understory comprised of younger Douglas-fir, tanoak and madrone. The general region consists of a mosaic of forest and open meadow which was historically maintained by punctuated fire regimes. In more recent decades, fire suppression has resulted in conifer encroachment into areas that were historically meadow habitat. The timber stands around the conversion areas appear very healthy with adequate conifer stocking. The understory around the conversion areas is well kept and generally free of excessive debris.

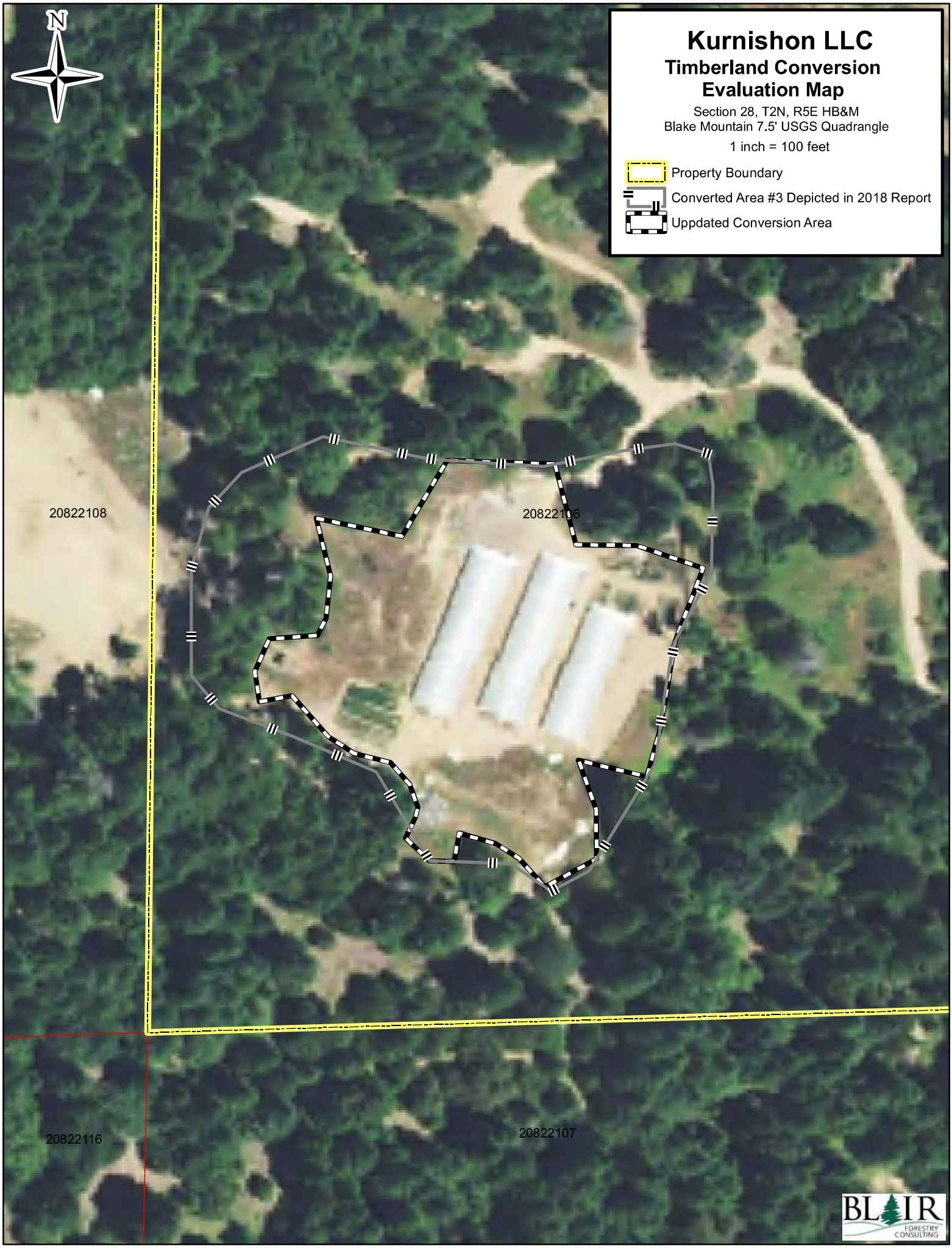
The property is located within Humboldt County, which is in the Zone of Infestation for Sudden Oak Death (SOD). No symptoms or signs of SOD were observed during evaluation.

Project Description

The current and previous property owners of APN 208-221-006 conducted unauthorized timber operations violating California Public Resources Codes (PRC)s 4571 (a) – Necessity of License, 4581 – Necessity of a Timber Harvest Plan and 4621 (a) - Application for Conversion. There are a total of 3 unauthorized Conversion Areas within the subject parcel (Conversion Areas #1 - #3; see Conversion Evaluation Map for locations).

This Timberland Conversion Evaluation focused primarily on unauthorized timberland conversion activities associated with cannabis cultivation sites and inconsistencies with the requirements of the California Forest Practice Rules (CFPRs). Any other areas previously cleared for permitted structures that were not cultivation related were not the focus of the site visit (although the home site was inspected for hazard reduction). All timberland conversion sites are on a southwest facing slope and and represent approximately 3.0 acres. The combined acreage of the three conversions inspected during this evaluation is barely within the 3-acre maximum Conversion Exemption allowed under 14 CCR 1104.1.

Humboldt County has zoned this parcel **Forestry Recreation (FR)** – which is "intended to be applied to forested areas of the County in which timber production and recreation are the desirable predominant


N
Kurnishon LLC
Timberland Conversion
Evaluation Map
Section 28, T2N, R5E HB&M
Blake Mountain 7.5' USGS Quadrangle
1 inch = 100 feet
Property Boundary
Converted Area #3 Depicted in 2018 Report
Uppdated Conversion Area
20822108
20822106
20822116
20822107
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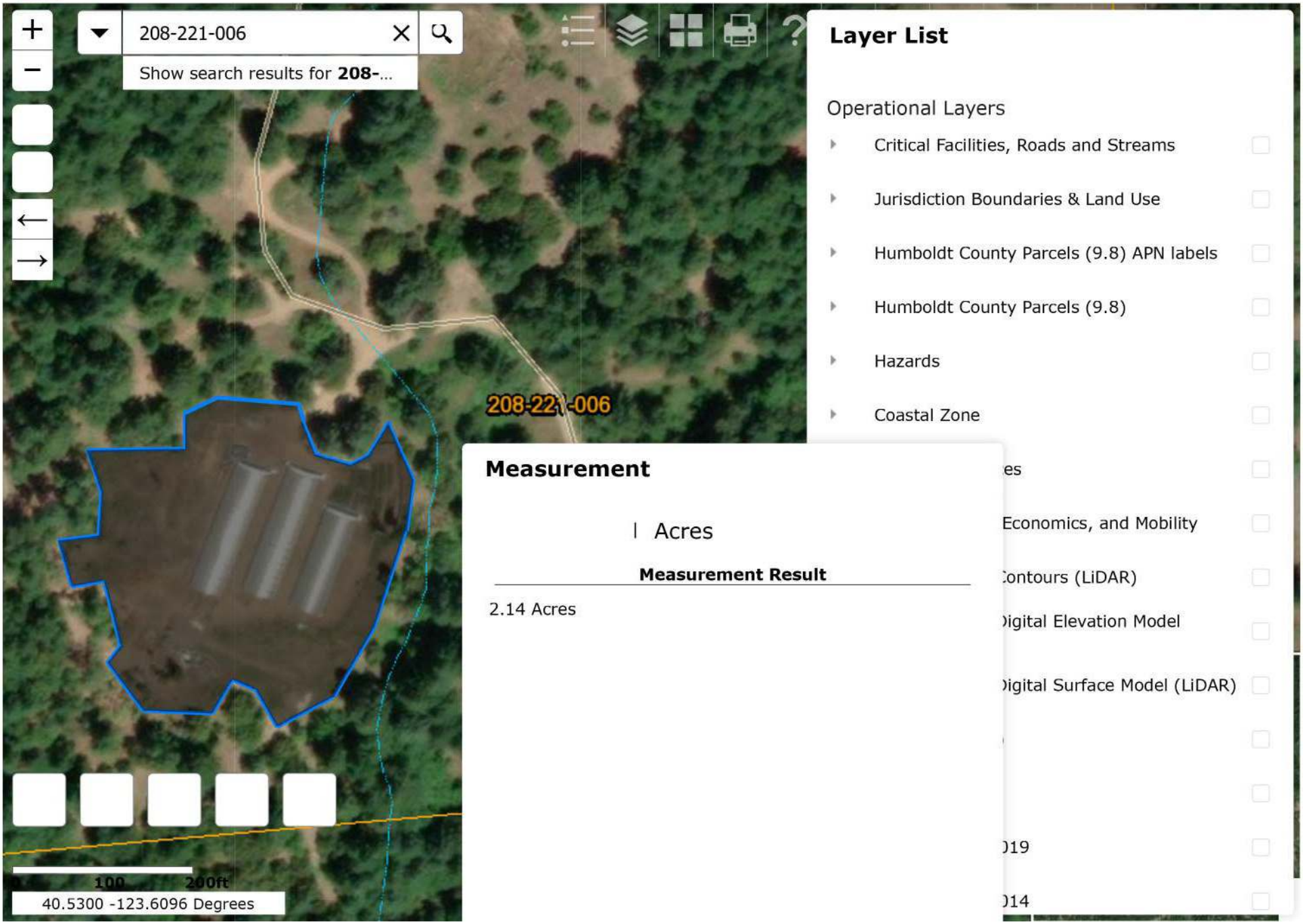
Humboldt County Web GIS

Planning & Building Department



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RESTOCKING PLAN
FOR
APN 208-221-006
April 11, 2022

Restocking Plan

Restocking Areas: Based on Soil Vegetation Mapping and observations by the RPF, the areas for restocking are classified as Site III and Site IV lands which historically have been occupied primarily by Douglas-fir. Group B species such as true oak (black/white), tanoak, and madrone are also present on the landscape. Aerial imagery indicates that these sites have all harbored trees historically. The landowner is encouraged to plant Douglas-fir in all areas where it once existed. Naturally occurring Group B species may be used to satisfy stocking requirements where they already exist. As per 14 CCR 912.7(b)(1), Site III lands shall be classified as acceptably stocked if an area contains an average point count of 125 trees per acre and Site IV lands shall be classified as acceptably stocked if an area contains an average point count of 100 trees per acre. See attached Restocking Plan Map

Restocking Site Number	Site Class	Total Acreage	# Trees	Spacing (ft)	Additional Notes
1	III	0.43	73	16' X 16'	Stocking rate of 170 Douglas-fir trees/acre – will account for potential mortality.
2	III	0.13	22	16' X 16'	Stocking rate of 170 Douglas-fir trees/acre – will account for potential mortality.
3	III	0.43	73	16' X 16'	Stocking rate of 170 Douglas-fir trees/acre – will account for potential mortality.
4	IV	0.25	34	18' X 18'	Stocking rate of 134 Douglas-fir trees/acre – will account for potential mortality.
Totals		**1.24 acres**	**202**		

Site Preparation: Site preparation is utilized to facilitate timber stand establishment. The practice is used to make the restocking site suitable for planting seedlings and establishing a new stand of trees. Site preparation activities remove or reduce competing vegetation, reduce or remove undesirable trees and logging debris, and prepare the soil to ultimately promote the growth and survival of the desired tree species. There are multiple methods of site preparation including broadcast burning or pile burning, chemical (herbicide) application, and mechanical site preparation. Chemical and mechanical site preparation are most suited for smaller scale projects such as this.

Chemical preparation includes broadcast and direct herbicide application to reduce competing undesirable vegetation. Chemical preparation can be applied before planting if vegetation is present and post-planting if competing vegetation threatens desired tree species survival and thus the successful restocking of the site. Where conditions exist on cutover timberlands or agricultural lands that limit planting space or root growth and development, mechanical site preparation may be necessary. Tractor piling of slash and brush to make planting space in areas that otherwise have little exposed soil is one form of mechanical site preparation. Subsoiling/ripping or tilling is a mechanical site preparation method used for heavy or compacted soils to increase aeration and water-holding capacity and break up root restricting hardpans and/or traffic pans. This method may be appropriate for abandoned road grades, historic landing areas or other areas where soils have become otherwise unsuitable for seedling survival. Mechanical or chemical site preparation activities shall not occur within watercourse protection zones as defined by 14 CCR 916.5 unless specified as part of an approved streamside restoration plan.

Recommendations: All Restocking Sites: Employ manual or mechanical ripping or tilling of the planting surface as necessary if soils are compacted and could potentially limit root growth or tree survival. Mechanical site preparation involving soil disturbance should occur during rainless periods of the year and should be conducted to minimize delivery of sediment to waters of the State. In the case that rain causes overland flow across or along the disturbed surface that could deliver sediment into a watercourse or lake in quantities deleterious to the beneficial uses of water, soil stabilization measures should be employed and may include straw waddles and/or drift fencing. Retain all existing conifer stocking, snags and residual hardwood trees with basal cavities, hollows, and other complex crown iterations valuable to wildlife during mechanical site preparation activities.

Types of Seedlings: Harvested and/or understocked timberlands should be artificially regenerated with naturally occurring conifer species and cultivars well-adapted to the timber stand's specific climate, elevation, and other environmental conditions. Planting seedlings from appropriate seed zones and elevation ranges ensures better seedling success and, eventually, a more resilient timber stand. Specifically, timberland within the property is characterized by Douglas-fir. The areas to be planted occur within California Seed Zone 303 at approximately 3,200 feet in elevation.

Recommendation: The landowner shall plant Douglas-fir at a uniform spacing no less than 16-feet by 16-feet for Site II lands (170 trees per acre) and 18-feet by 18-feet for Site IV lands (134 trees per acre).

Conifer seedlings that come from nurseries are typically available in two forms: bareroot seedlings and containerized seedlings. Bareroot seedlings are stock where the roots are exposed at the time of planting. Bareroot seedlings are generally grown in nursery seedbeds and pulled from the soil in which they are grown to be planted in the field. Containerized seedlings are individually grown in a range of hard-walled vessels or in peat pots from seed. Containerized seedlings typically have a higher survival rate after planting due to their well-formed root system and are usually more expensive than bareroot seedlings.

Recommendation: Given the conditions of the site and the higher survival rate associated with containerized stock, use containerized seedlings if available.

Seedling Care: Seedling care and handling is extremely important to ensure post planting survival.

Recommendation: For long-term storage (more than 3 days), store seedlings at 33 to 36 degrees Fahrenheit. For short-term storage (several hours to less than 3 days), store below 42 degrees Fahrenheit. At the planting site, do not to allow the roots dry out and store trees in the shade to avoid exposure to the sun or warmer temperatures.

Planting Instructions: When planting seedlings, the landowner or tree planter shall operate under the following guidelines:

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. Existing conifers are present around the periphery of the stocking sites. In these areas, the furthest edge of seedling placement should be directly under widest branching of standing conifers (a.k.a. under the dripline). Additionally, it is highly possible that naturally occurring Douglas-fir has already seeded in on some restocking site areas. These trees should be used for stocking and new seedlings can be spaced 16' from them.

3. If utilizing manual site preparation, a 3' x 3' space of any competing herbaceous vegetation should be scraped from the planting site to expose bare soil for each tree prior to planting.

4. Using a Hodad or Dibble, 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.

5. Place the seedling into the hole taking care not to bend the taproot, or main vertical root, and cover with soil.

6. Pack the soil down firmly around the seeding to remove any air pockets.

7. See Appendices A-D for illustrations for correct planting techniques.

Stock Purchase: Ideally, landowners should procure seedlings from sources growing local, site-specific stock. Appropriate stock is determined by stand type, seed zone, elevation, as well as other factors like soil type, site quality, and weather.

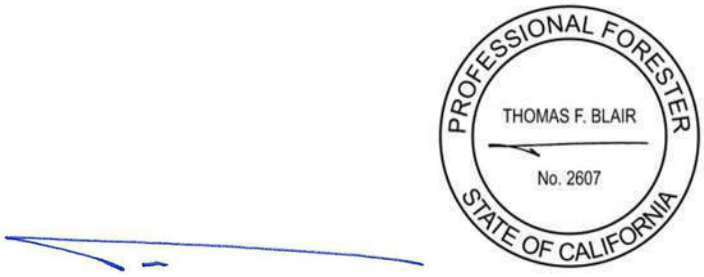
Recommendation: The RPF recommends acquiring Douglas-fir seedlings from Trent Johns at the Jonsteen Company in McKinleyville, CA at 916-799-7967 or Jessica Huang at CALFIRE email: Jessica.Huang@fire.ca.gov. It is recommended that seedlings acquired be of the appropriate stock based on geographic area and site conditions.

Monitoring Seedling Survival: Although a newly planted stand initially fulfills the Forest Practice Rule's stocking standards, the planted stand must continually maintain a minimum average density of 125 trees per acre (or 18-foot by 18-foot spacing) to meet the intent of the California Forest Practice Rules (CFPRs). A Countable Tree per 14CCR 895.1 must be in place for at least two growing seasons and must be alive and healthy, among other requirements. Seedling survival can vary widely depending on several factors including weather, herbivory, genetics, etc. Monitoring growth and success of planted seedlings is key to ensure a minimum 125-point count stocking level is maintained or achieved 2-years after planting.

Recommendation: Monitor growth and success of planted trees one year after planting. Conduct a point count stocking sampling survey (protocol described in CFPRs 14CCR 1072). If less than 55% of the planted area meets the 125-point count minimum stocking level, repeat the planting process the following winter.

Certification: Within five years of planting, but no sooner than three years, a report of stocking shall be submitted to the County by an RPF that certifies that the area meets the minimum stocking standards of 14 CCR 912.7.

Sincerely,



Thomas Blair, Registered Professional Forester 2607

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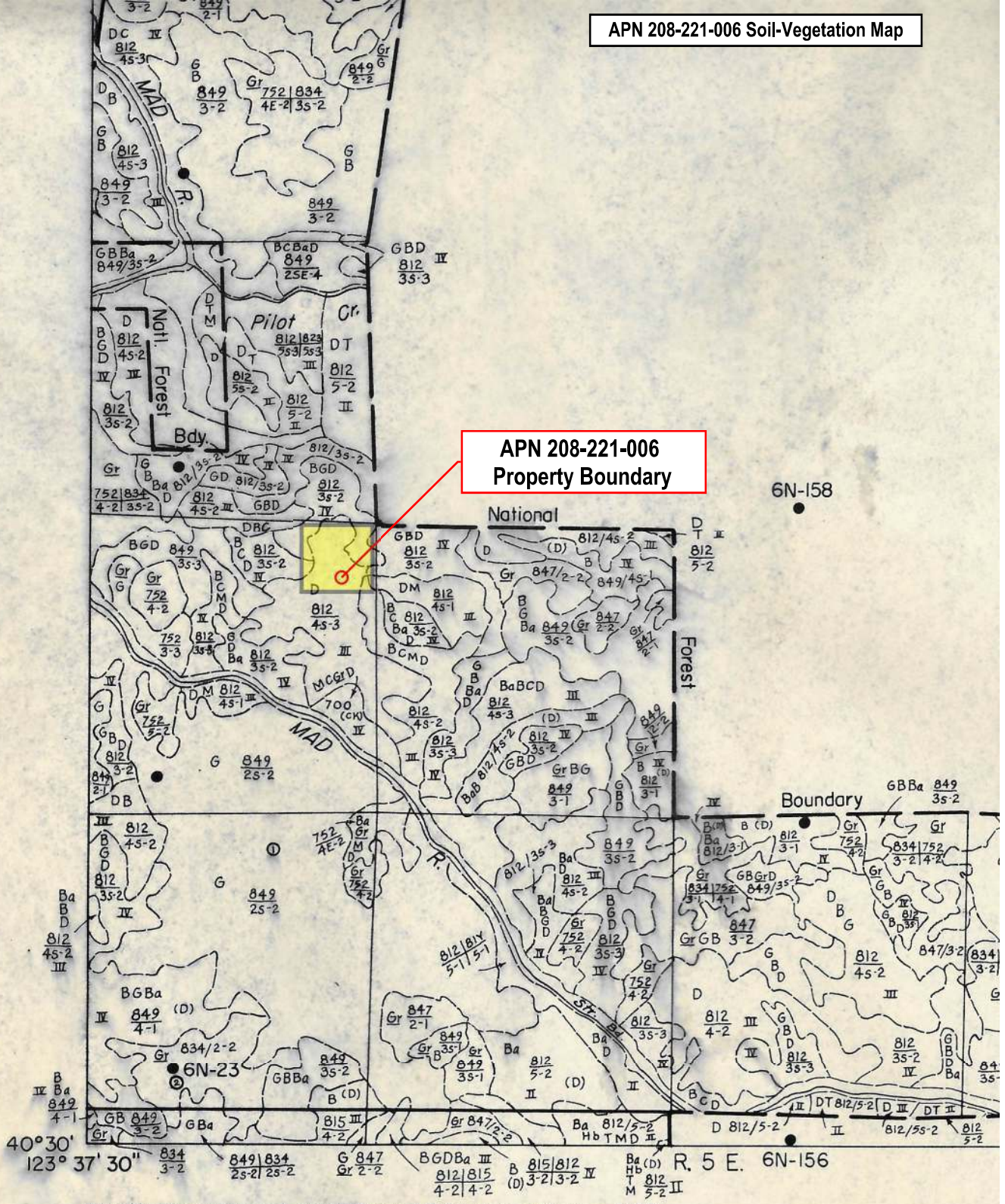
APN 208-221-006 Soil-Vegetation Map



Classification and mapping by: W. Colwell, E. Gladish, J. Mallory, 1957.

Map compilation by: H. Givens, W. Woo. 1957, 1958.

Edition of April 1958.

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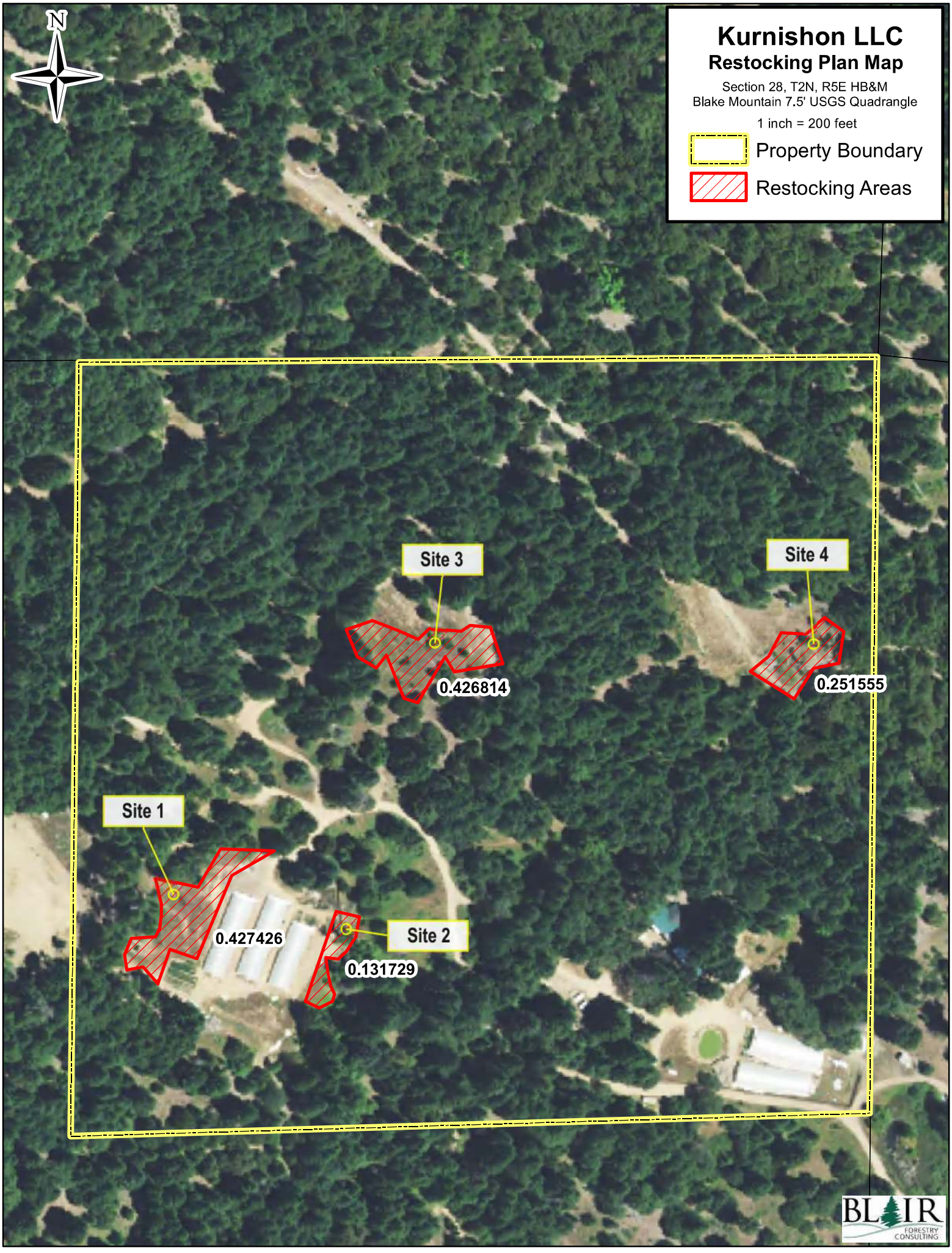
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