



FlorraCanna Care
11373



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March 1, 2018

FlorraCanna Care
c/o Ruth Gabor
11842 Moorpark St, #F
Studio City, CA 91604

Dear FlorraCanna Care:

The following is an evaluation of potential timberland conversion on cannabis cultivation sites and an associated area included in the Humboldt County Cannabis Permit Application (Apps #11373) for APN 523-021-004. Please accept this letter as the RPF's written report required by Humboldt County Code, Ordinance No. 2559 (Commercial Medical Marijuana Land Use), Section 55.4.10 (j), cited below.

"Alternately, for existing operations occupying sites created through prior unauthorized conversion of timberland, if the landowner has not completed a civil or criminal process and/or entered into a negotiated settlement with CALFIRE, the applicant shall secure the services of a registered professional forester (RPF) to evaluate site conditions and conversion history for the property and provide a written report to the Planning Division containing the RPF's recommendation as to remedial actions necessary to bring the conversion area into compliance with provisions of the Forest Practices Act. The Planning Division shall provide CAL-FIRE written Notice of Availability of the RPF's report. If CAL-FIRE takes no action within ten (10) days of the notice of availability, the report recommendations shall become final."

Timberland Resource Consultants (TRC) inspected and evaluated the cultivation sites and associated area contained within the application on February 2nd, 2018. Landowner representative Tim Busman also attended the site visit. The RPF and his designees have exercised due diligence in reviewing all sites and available resources to fully assess potential timberland conversion and consequential impacts. This report evaluates the cultivation sites and associated area for timber operations only. The scope of this report does not include: all other land alteration (such as grading, construction, and other permit-regulated activities), all property features and sites unrelated to cultivation activities, or any proposed, planned, or absent cultivation-related project sites. All findings are summarized in the report below.

Project Location

APN: 523-021-004

Acreage: 162.0 assessed lot acres; 169.7 GIS acres

Legal Description: SW ¼ of Section 15;

Township 7 North, Range 5 East,

Humboldt Base & Meridian, Humboldt County

Located on USGS 7.5' Quadrangle: Salyer, 1979

Humboldt County Zoning: TPZ

Site Address: None

Landowner/Timber Owner: Ruth Gabor, 11842 Moorpark St, #F, Studio City, CA 91604

Project Location Description: The parcel is located approximately 2.7 air miles north-northeast of Willow Creek, CA, and 6.3 air miles southwest of Hoopa, CA. To access the project area from Willow Creek, CA, on eastbound Highway 299, turn left on to Country Club Road; turn left on to Patterson Road; turn right on to Horse Linto Creek Road; continue for 0.9 miles then turn right on to an unnamed private road; continue for 1.5 miles to reach the project areas above and below the road (see General Location Map).

Parcel Description & Timber Harvest History

Note: The property background has been summarized using personal accounts of the current landowner, digital orthographic quadrangle (DOQ) imagery, Humboldt County Web GIS, CAL FIRE Watershed Mapper v2, and Historic Aerials. To avoid speculation and maintain relevancy, the property background focuses mainly on the past 10-15 years.

The property consists of a single, 162.0-acre parcel known as APN 523-021-004. The parcel is densely forested with mature Douglas fir, tanoak, and Pacific madrone (see Photo 1). The average age of the dominant Douglas-fir trees is estimated to be approximately 50-70 years old. The parcel contains segments of Class I, II, and III watercourses including Class I Coon Creek which is tributary to the Trinity River. The property contains a private, seasonal road system.

Review of historic aerial imagery from 1947 to present shows evidence of logging events such as truck roads and skid roads. No definitive even-aged units were observed within the property; however, field observations indicate that the stand was harvested sometime in the last 40 to 50 years. It does not appear that any documented commercial timber harvesting has occurred in the last 20 years (CALFIRE Watershed Mapper v2). Ruth Gabor purchased the property and its timber from Eel River Sawmills Inc. in November 2004 (Parcel Quest).

Project Description

Five cultivation sites and one associated area were inspected during the field assessment within APN 523-021-004. The following table lists the inspected sites and their acreages; see detailed site descriptions below.

Cultivation Site/Associated Area	Total Acreage
Cultivation Site A	0.10
Cultivation Site B	0.14
Cultivation Site C	0.14
Cultivation Site D (including Storage Buildings 1, 2, & 3)	0.16
Cultivation Site E	0.21
Water Storage Area	0.02
TOTAL	0.77

Cultivation Site A

Cultivation Site A is a 0.10-acre area located in the northeastern portion of the property. Cultivation-related activities observed included two greenhouses (see Photo 1). Review of aerial imagery from 1972 reveals that the site occupies a historic landing. The landing was partially cleared of trees, stumps, and vegetation between 2005 and 2009. The site was expanded to its current size between 2010 and 2014. It does not appear that any commercial timber operations occurred. Slash and woody debris from the conversion activities still exist along the eastern and southwestern edges of the site. The cultivation activities observed impede the use of this space for current timber growth and harvesting; in this way, the landowner has effectively converted the single use of this space from timber production to cannabis cultivation.

Cultivation Site B

Cultivation Site B is a 0.14-acre area located in the northeastern portion of the property, approximately 560 feet west-southwest of Cultivation Site A. Cultivation-related activities observed included one greenhouse (see Photo 2). Review of aerial imagery reveals that the site was cleared of trees, stumps, and vegetation between 2005 and 2009; this initial area was larger than the current cultivation site. It does not appear that any commercial timber operations occurred. Slash and woody debris from the conversion activities still exist across the seasonal road southwest of the site. The cultivation activities observed impede the use of this space for current timber growth and harvesting; in this way, the landowner has effectively converted the single use of this space from timber production to cannabis cultivation.

Cultivation Site C

Cultivation Site C is a 0.14-acre area located in the southeastern portion of the property, approximately 750 feet southwest of Cultivation Site A. Cultivation-related activities observed included one greenhouse

Project Description cont'd

Cultivation Site C cont'd

and several outdoor-grown cannabis plants (see Photo 3). Review of aerial imagery from 1972 reveals that the site occupies a historic skid road. The skid road was partially cleared of trees, stumps, and vegetation between 2005 and 2009. The site was expanded to its current size between 2012 and 2016. It does not appear that any commercial timber operations occurred. Slash and woody debris from the conversion activities still exist along the northwestern edge of the site. The cultivation activities observed impede the use of this space for current timber growth and harvesting; in this way, the landowner has effectively converted the single use of this space from timber production to cannabis cultivation.

Cultivation Site D

Cultivation Site D is a 0.16-acre area located in the southeastern portion of the property, approximately 710 feet south of Cultivation Site A. Cultivation-related activities and structures observed included several outdoor-grown cannabis plants and three small storage buildings used to house cultivation project materials (see Photos 4-6). Review of aerial imagery from 1972 reveals that the site occupies historic skid roads. The site was partially cleared of trees, stumps, and vegetation between 1998 and 2005; this initial area was larger than the current cultivation site. Storage Buildings 1 and 2 were constructed between 2009 and 2010. Storage Building 3 was constructed between 2014 and 2016. It does not appear that any commercial timber operations occurred. Slash and woody debris from the conversion activities still exist along the northern and eastern edges of the site. The cultivation activities observed impede the use of this space for current timber growth and harvesting; in this way, the landowner has effectively converted the single use of this space from timber production to cannabis cultivation.

Cultivation Site E

Cultivation Site E is a 0.21-acre area consisting of a northern flat and a southern flat located in the southeastern portion of the property, approximately 1,000 feet south of Cultivation Site A. Cultivation-related activities observed included several outdoor-grown cannabis plants (see Photos 7 and 8). Review of aerial imagery from 1972 reveals that the site occupies historic skid roads. The site was partially cleared of trees, stumps, and vegetation between 1998 and 2005; this initial area was larger than the current cultivation site. Storage Buildings 1 and 2 were constructed between 2009 and 2010. Storage Building 3 was constructed between 2014 and 2016. It does not appear that any commercial timber operations occurred. Slash and woody debris from the conversion activities still exist along the northern and eastern edges of the site. The cultivation activities observed impede the use of this space for current timber growth and harvesting; in this way, the landowner has effectively converted the single use of this space from timber production to cannabis cultivation.

Water Storage Area

The Water Storage Area is a 0.02-acre area occupied by four plastic, water storage tanks and a well. This associated area is located in the southeastern portion of the property, approximately 1,160 feet south of Cultivation Site A (see Photo 9). Review of aerial imagery from 1972 reveals that the site occupies a historic skid road. The site was cleared of trees, stumps, and vegetation between 2014 and 2016. It does not appear that any commercial timber operations occurred. Slash and woody debris from the conversion activities still exist along the northern edge of the site. The cultivation activities observed impede the use of this space for current timber growth and harvesting; in this way, the landowner has effectively converted the single use of this space from timber production to cannabis cultivation.

Other Mapped Features

The Overview Map shows the location of multiple plastic water storage tanks used for cultivation water storage (see Photo 10). Though minor tree and vegetation clearing may have occurred to install these features, the surrounding timber stand still meets the stocking standards of the California Forest Practice Rules (FPRs). Ultimately, the water tanks do not impede the use of the land for current or future timber growth and harvesting; therefore, they do *not* constitute timberland conversion.

Timberland Conversion Summary

In total, TRC observed approximately 0.77 acres of unauthorized timberland conversion for cultivation-related purposes within APN 523-021-004. This total does not exceed the three-acre conversion exemption maximum.

Limitations and Considerations for Timberland Conversion Activities

Watercourses and Water Resources

14CCR 1104.1(a)(2)(F): "No timber operations are allowed within a watercourse and lake protection zone unless specifically approved by local permit (e.g., county, city)."

No conversion areas exist within Watercourse and Lake Protection Zones (WLPZ) or Equipment Exclusion Zones (EEZs) on the property. Overall, no conversion activities appear to have impacted water resources.

Slash, Woody Debris, and Refuse Treatment

14 CCR 914.5(b): "Non-biodegradable refuse, litter, trash, and debris resulting from timber operations, and other activity in connection with the operations shall be disposed of concurrently with the conduct of timber operations."

14CCR 1104.1(a)(2)(D) – Treatment of Slash and Woody Debris

- 1) Unless otherwise required, slash greater than one inch in diameter and greater than two feet long, and woody debris, except pine, shall receive full treatment no later than April 1 of the year following its creation, or within one year from the date of acceptance of the conversion exemption by the Director, whichever comes first.
- 2) All pine slash three inches and greater in diameter and longer than four feet must receive initial treatment if it is still on the parcel, within 7 days of its creation.
- 3) All pine woody debris longer than four feet must receive an initial treatment prior to full treatment.
- 4) Initial treatment shall include limbing woody debris and cutting slash and woody debris into lengths of less than four feet, and leaving the pieces exposed to solar radiation to aid in rapid drying.
- 5) Full treatment of all pine slash and woody debris must be completed by March 1 of the year following its creation, or within one year from the date of acceptance of the conversion exemption by the Director, whichever comes first.
- 6) Full slash and woody debris treatment may include any of the following:
 - a) Burying;
 - b) Chipping and spreading;
 - c) Piling and burning; or
 - d) Removing slash and woody debris from the site for treatment in compliance with (a)-(b). Slash and woody debris may not be burned by open outdoor fires except under permit from the appropriate fire protection agency, if required, the local air pollution control district or air quality management district. The burning must occur on the property where the slash and woody debris originated.
- 7) Slash and woody debris, except for pine, which is cut up for firewood shall be cut to lengths 24 inches or less and set aside for drying by April 1 of the year following its creation. Pine slash and woody debris which is cut up for firewood shall be cut to lengths 24 inches or less and set aside for drying within seven days of its creation.
- 8) Any treatment which involves burning of slash or woody debris shall comply with all state and local fire and air quality rules.

Most slash and woody debris generated from the conversion activities has already been treated; however, remnant slash still exists along the eastern and southwestern edges of Cultivation Site A, across the seasonal road southwest of Cultivation Site B, along the northwestern edge of Cultivation Site C, along the northern and eastern edges of Cultivation Site D, along the northern and eastern edges of Cultivation Site E, and along the northern edge of the Water Storage Area (see Photos 11-14). All slash should be treated according to the FPRs (see Recommendation 1).

Limitations and Considerations for Timberland Conversion Activities cont'd

Biological Resources and Forest Stand Health

14 CCR 1104.1 (2)(H): "No sites of rare, threatened or endangered plants or animals shall be disturbed, threatened or damaged and no timber operations shall occur within the buffer zone of a sensitive species as defined in 14 CCR 895.1"

A query of the California Natural Diversity Database (CNDDDB) on January 31st, 2018 showed observations of five (5) sensitive, rare, threatened, or endangered species or species of special concern within a 0.7-mile radius biological assessment area (BAA) surrounding the cultivation sites and associated area. No individuals of sensitive, rare, threatened, or endangered species or species of special concern were observed during the TRC field assessment of the project area, though potential habitat may exist on the property. See "Multiple Occurrences per Page" CNDDDB Report and 0.7-Mile BAA CNDDDB (APN 523-021-004) Map attached for more information.

The query of the CNDDDB also revealed no (0) known Northern Spotted Owl (NSO) Activity Centers within a 0.7-mile radius BAA surrounding the cultivation sites and associated area. No evidence of NSO individuals was observed during the TRC field assessment though habitat exists on the property.

No major forest health issues were observed during the field assessment. Though the property is located within Humboldt County, a Zone of Infestation (ZOI) for Sudden Oak Death (SOD), no symptoms, signs, or evidence of oak mortality were observed (*Oak Mortality Disease Control*). According to UC Berkeley's Mobile SOD Map, no trees have been sampled for SOD infection within a one-mile radius of the cultivation sites and associated areas. No risk assessment was made at the property. The conversion activities do not appear to have impacted forest health.

The conversion areas did not include late successional stands, late seral stage forests, or old growth trees. The conversion area did not include any trees that existed before 1800 A.D. and are greater than sixty (60) inches in diameter at stump height for Sierra or Coastal Redwoods, and forty-eight (48) inches in diameter at stump height for all other tree species.

Cultural Resources

14 CCR 1104.1 (2)(I): "No timber operations are allowed on significant historical or archeological sites."

No archeological sites were observed during the TRC field assessment. The RPF's designee conducted pre-field research for the project's geographic location and closely surveyed the converted sites and surrounding undisturbed areas for presence or evidence of prehistoric or historic sites. The archaeological survey was conducted by Brita Rustad, a certified archaeological surveyor with current CALFIRE Archeological Training (Archeological Training Course #161). The survey consisted of examining boot scrapes, rodent disturbances, natural and manmade areas of exposed soils, and road and cultivation site surface.

Per 14 CCR 1104.2(2)(I), all required Native American tribes and organizations have been notified of the project location and are encouraged to respond with any information regarding archaeological sites, cultural sites, and/or tribal cultural resources within or adjacent to the project area.

Recommendations

In summary, a total of 0.77 acres of unauthorized timberland conversion has occurred within APN 523-021-004. This total does not exceed the three-acre conversion exemption maximum. The conversion activities conducted on the property do *not* comply with the standards set forth in the California Forest Practice Act and the California Forest Practice Rules. The RPF recommends the following measures for the converted areas:

- 1) Slash and Woody Debris Treatment: Within and surrounding all cultivation sites and the associated area, treat all slash piles and woody debris as soon as possible (and during an appropriate time of year) using one of the following methods: burying, chipping and spreading, piling and burning, or removal from site.

Sincerely,



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Enclosures:

- General Location Map
- Overview Map
- DOQ Map
- Water Resource Protection Plan - Site Map (prepared by TRC)
- "Multiple Occurrences per Page" CNDDDB Report
- 0.7-Mile BAA CNDDDB (APN 523-021-004) Map
- 0.7-Mile CNDDDB NSO (APN 523-021-004) Map
- Photos
- References

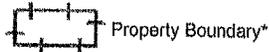
FlorraCanna Care - Timberland Conversion Evaluation

General Location Map

APN: 523-021-004

Revised: 01/30/18

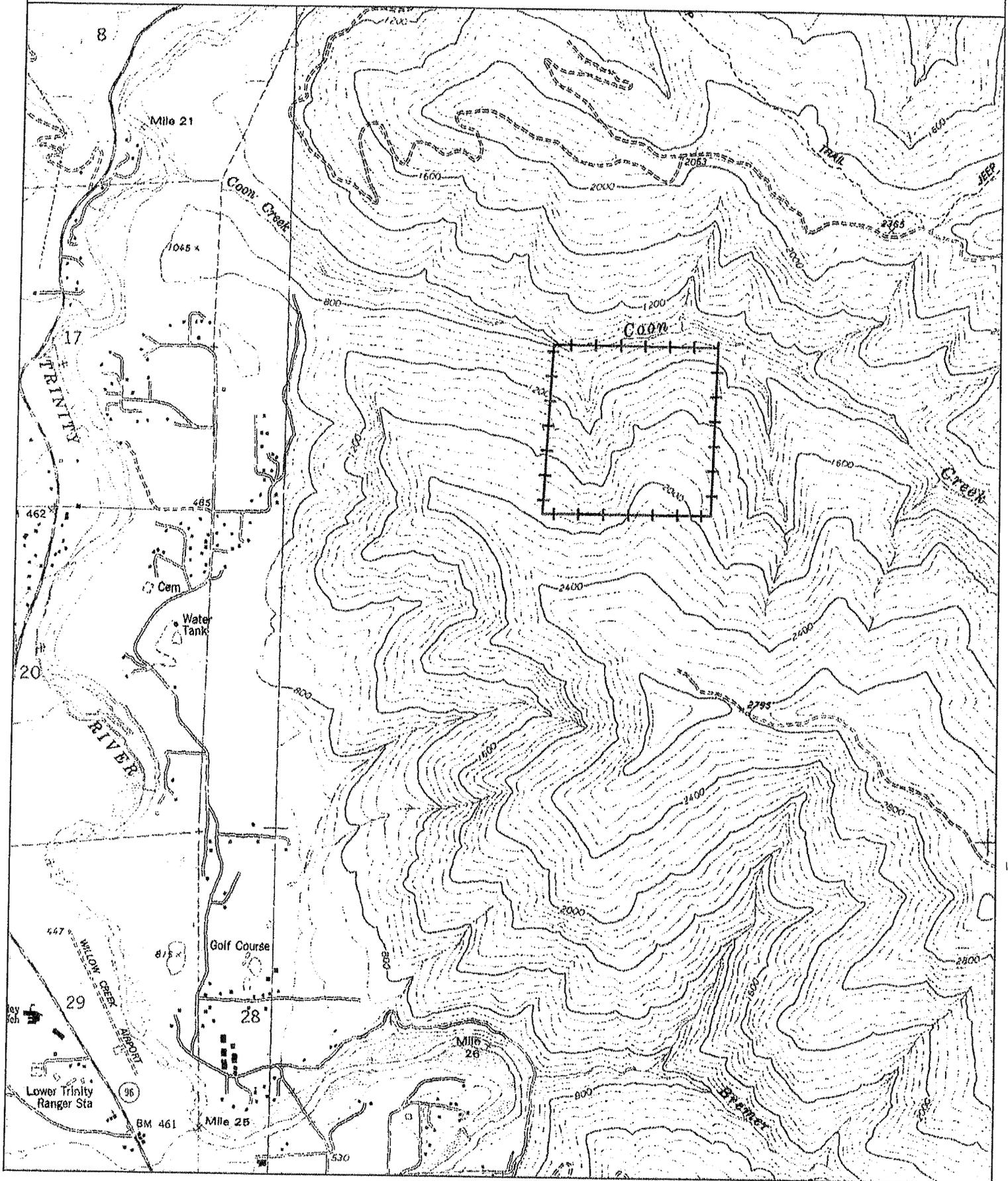
Sec. 15, T7N, R5E;
HB&M, Humboldt County
USGS 7.5' Quad: Salyer
Map Scale: 1" = 2,000'



Property Boundary*



*The property boundary depicted is adapted from the Humboldt County Assessor's Parcel Map and the WRPP Site Map. This mapped boundary may not precisely align with the geographic boundary on the ground. The RPF is not responsible for surveying property boundaries.



FlorraCanna Care - Timberland Conversion Evaluation

Overview Map

APN: 523-021-004

Sec. 15, T7N, R5E

HB&M, Humboldt County

USGS 7.5' Quad: Salyer

Revised: 03/01/18

Map Scale: 1" = 230'

Contour Intervals = 40'

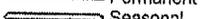
Property Features

-  Property Boundary*
-  Cultivation Sites & Associated Area
- Inspected Area****

Watercourses

-  Class I
-  Class II
-  Class III

Roads

-  Permanent
-  Seasonal
-  Trail

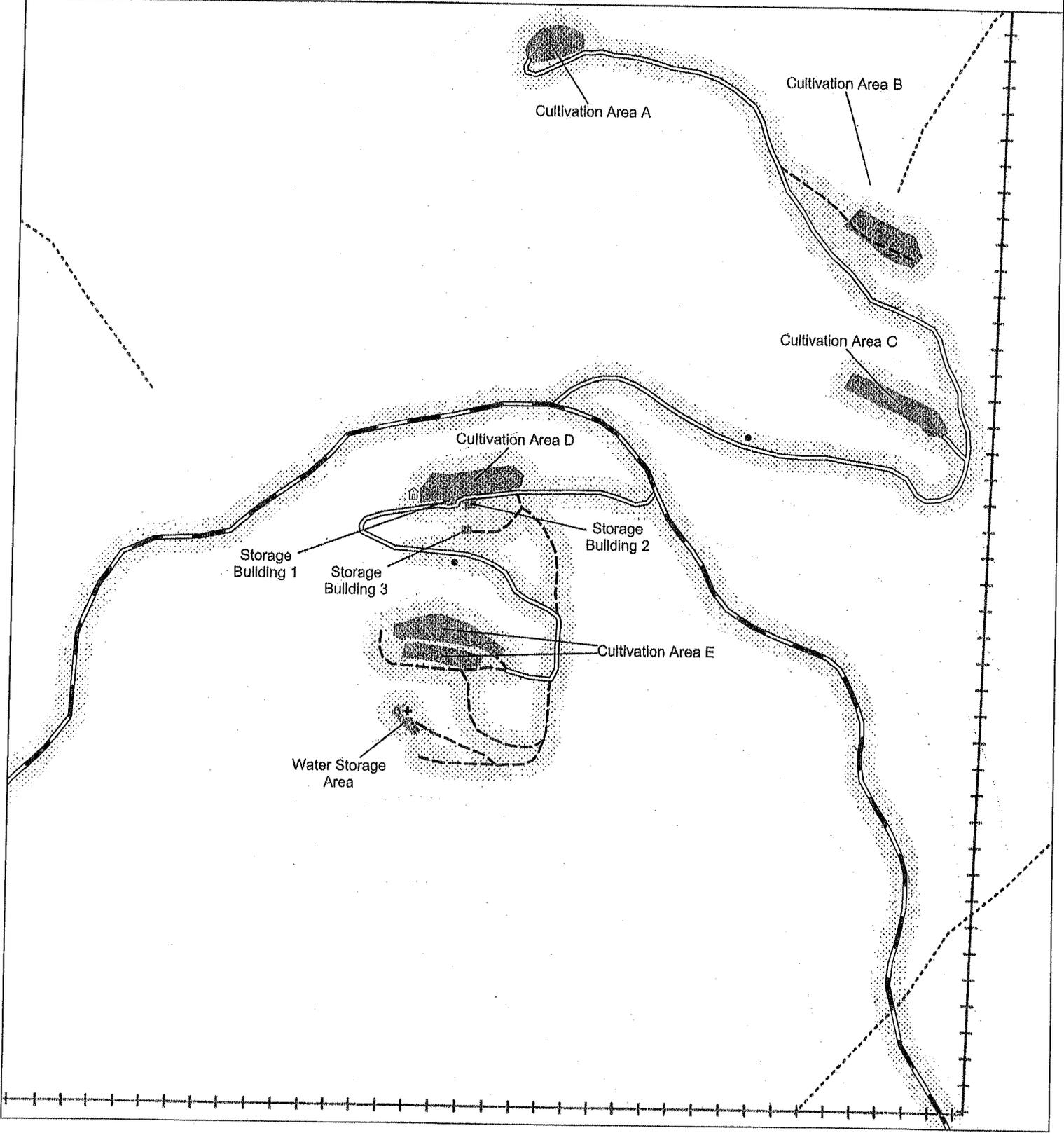
Other Features

-  Structure
-  Water Storage Tank(s)
-  Well



*The property boundary depicted is adapted from the Humboldt County Assessor's parcel map and WRPP Site Map. This mapped boundary may not precisely align with the geographic boundary on the ground. The RPF is not responsible for surveying property boundaries.

**The shaded area represents the extent of the inspected area. All watercourses and landscape features within the shaded area are mapped to the best of the RPF's ability. All features mapped outside of the inspected area are adapted from the Quadrangle and WRPP Site Map; accuracy may vary.



FlorraCanna Care - Timberland Conversion Evaluation

DOQ Map

APN: 523-021-004

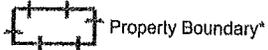
Sec. 15, T7N, R5E

HB&M, Humboldt County

USGS 7.5' Quad: Salyer

Map Scale: 1" = 300'

Revised: 02/20/18



Property Boundary*



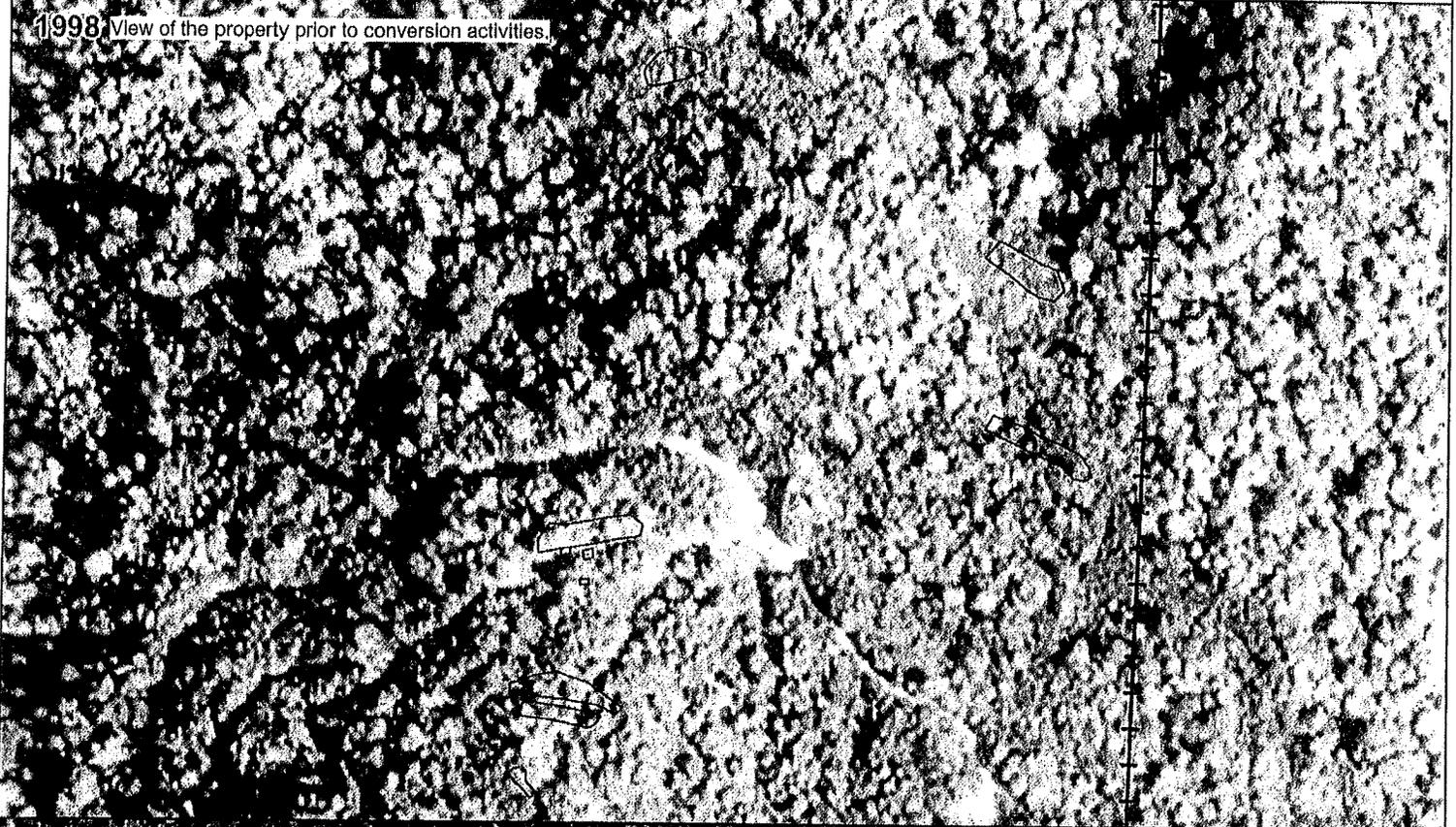
Cultivation Sites & Associated Area

N



*The property boundary depicted is adapted from the Humboldt County Assessor's parcel map and WRPP Site Map. This mapped boundary may not precisely align with the geographic boundary on the ground. The RPF is not responsible for surveying property boundaries.

1998 View of the property prior to conversion activities.



2016 View of the property after all conversion activities occurred.



Photos

The following photos were taken by Brita Rustad of Timberland Resource Consultants at APN 523-021-004 during the field inspection on February 2nd, 2018.



Photo 1: View of Cultivation Site A facing northeast. Notice the Douglas-fir-dominated timber stand in the background.



Photo 2: View of Cultivation Site B facing southeast.



Photo 3: View of Cultivation Site C facing east.



Photo 4: View of Cultivation Site D facing east. The building on the left is a sauna, not used for cultivation purposes.

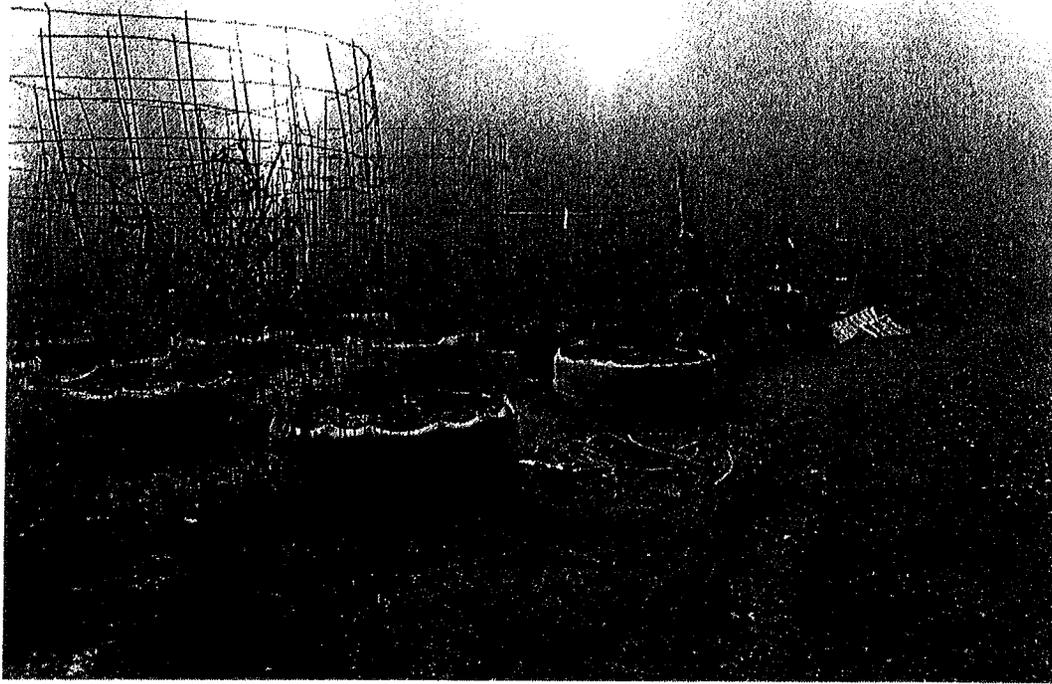


Photo 5: Additional view of Cultivation Site D facing east.

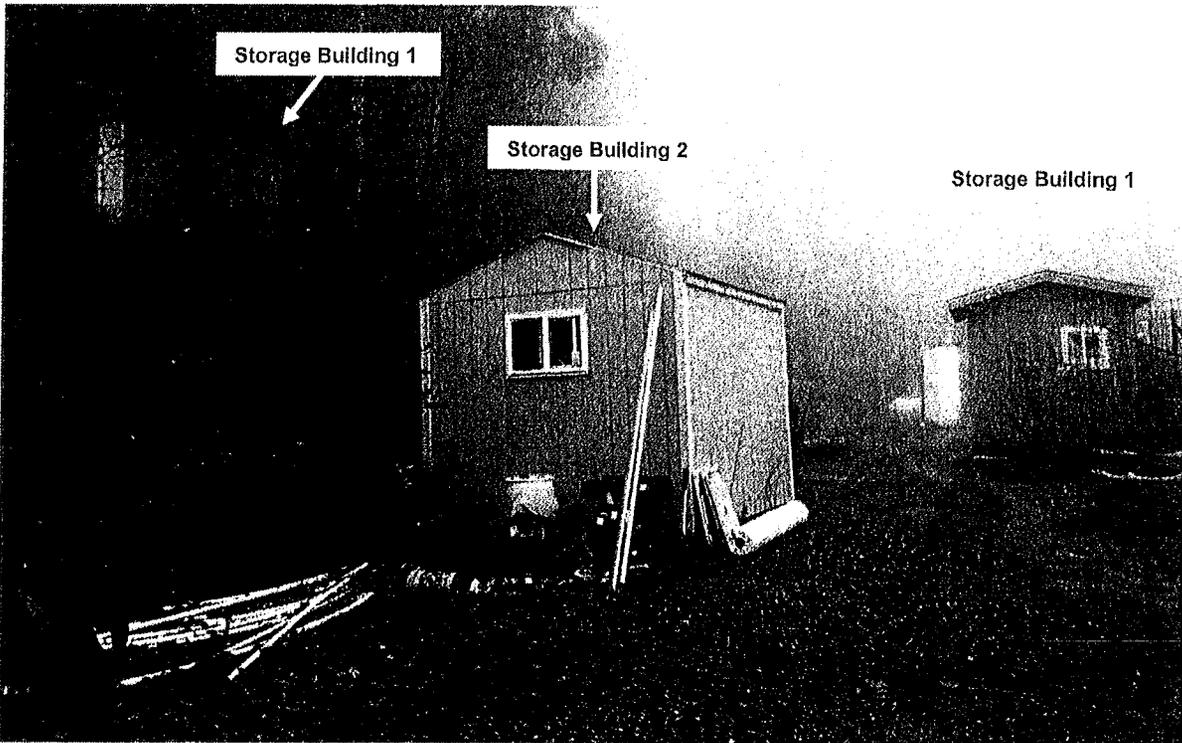


Photo 6: View of the three Storage Buildings at Cultivation Site D facing west.

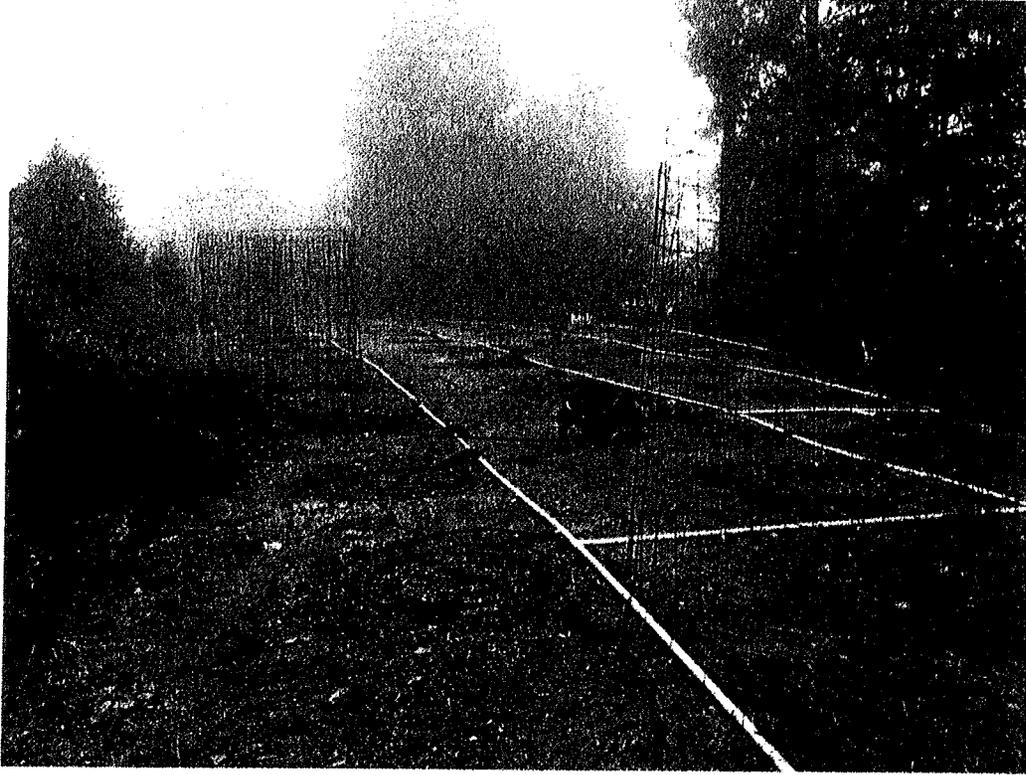


Photo 7: View of Cultivation Site E (northern flat) facing west.



Photo 8: View of Cultivation Site E (southern flat) facing west.

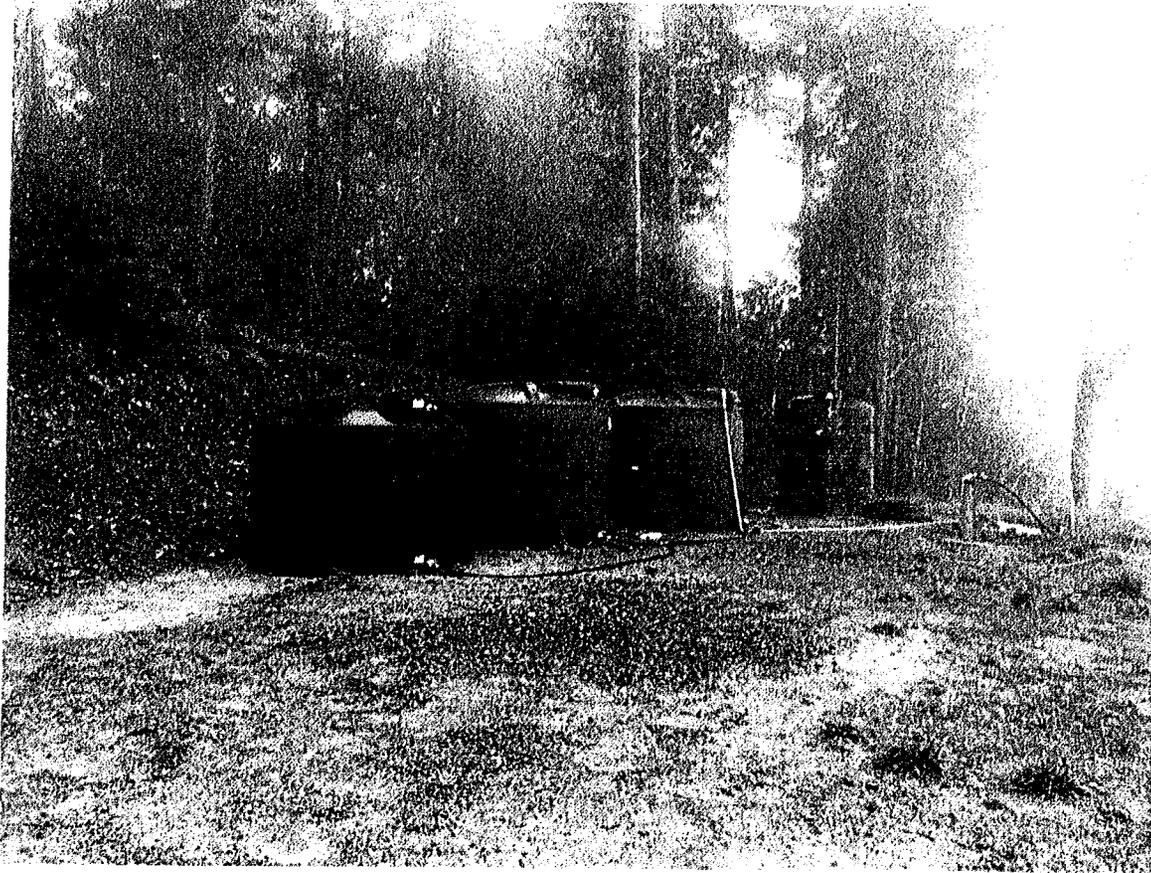


Photo 9: View of the Water Storage Area facing west.

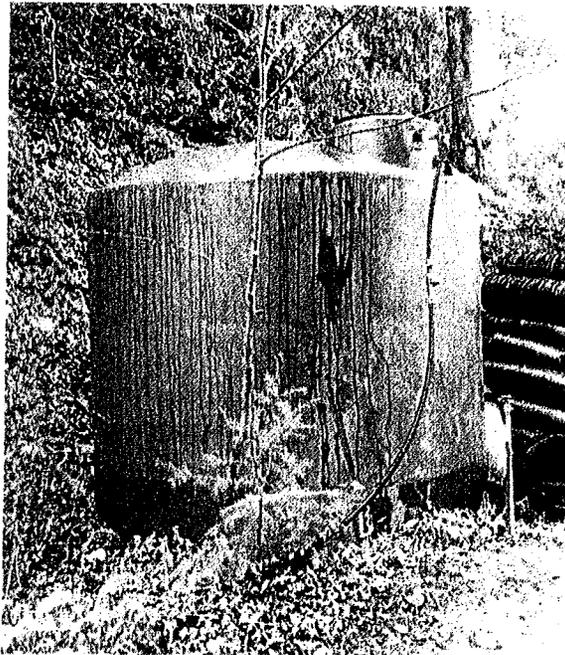
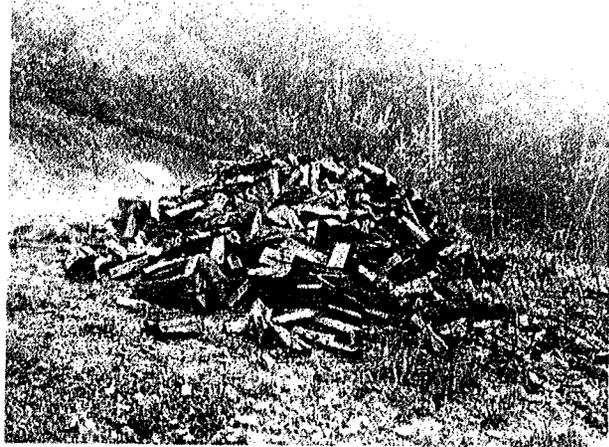
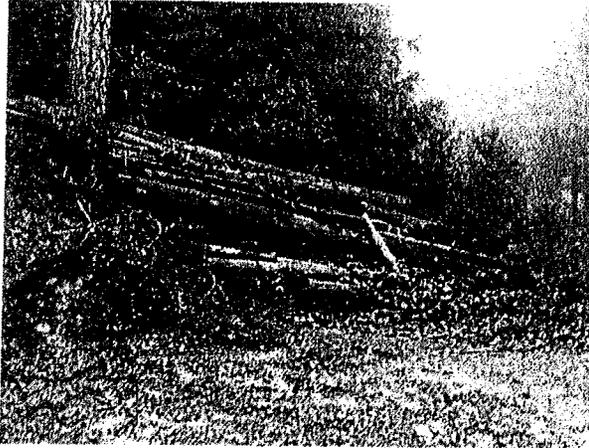


Photo 10: Example of scattered water storage tanks on the property that do not constitute timberland conversion.



Photos 11-14: Examples of slash and woody debris from conversion activities near cultivation sites and associated areas.

References

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