



App# 12030-CUP16

Providing Professional Forestry Services

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October 11, 2018

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



Dear Humboldt County Planning Department:

The following attached document is an evaluation of an existing, unauthorized timberland conversion which was inspected by Blair Forestry LLC within APN 208-221-006. Please accept this letter as the Registered Professional Forester's (RPF) written report showing sufficient evidence that the converted area was inspected as 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 HUMBOLDT COUNTY, CA- ORDINANCE NO. 2559 Page 12 of 35 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 RPF has exercised due diligence in inspecting and evaluating the past timber conversion and in making recommendations so that the past conversion falls into compliance with the California Forest Practice Rules (CFPRs).

Sincerely,

Thomas Blair RPF#2607

Enclosed: Conversion Evaluation Report, Photos, General Location Map, Timberland Conversion Evaluation Map, CNDDB Map

Timberland Conversion Evaluation Report

October 11, 2018

As mandated by:

Humboldt County Code, Ordinance No. 2559 (Commercial Medical Marijuana Land Use), Section 55.4.10 (j)

"Alternately, for existing operations occupying HUMBOLDT COUNTY, CA - ORDINANCE NO. 2559 Page 12 of 35 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. . . ."

Contact Information

1. Timberland Owners(s): **Kurnishon LLC**
Phone: **(707) 533-5373**
2. Timber Owner(s): **Same as above**
3. Registered Professional Forester (preparing report): **Thomas Blair**
RPF Number: **2607**
Address: **Blair Forestry LLC**
PO Box 2517
McKinleyville, CA 95519
Phone: **(707) 834-2990**

Location of Project

Legal Description of Ownership: **PARCEL 43 TIMBERLINE RANCH EST RS BK 26 PG 135**
Address: **River Rd. off County Line Creek Rd. (USFS 1N15)**

APN(s): **208-221-006**
Section 28; T2N; R5E; HB&M; Humboldt County
Parcel Size: **Approximately 40 acres**
Acres Converted: **2.99 acres**

Project Description

Property History

Note: Property boundaries are based on the Humboldt County Assessor's APN parcel map and may vary geographically. Assessor's Parcel data in the GIS mapping program differed slightly geographically. The property background has been summarized using personal accounts of current landowners, historic orthographic photography, Humboldt County Web GIS, and CAL FIRE Watershed Mapper v2.

This conversion evaluation report will focus on unauthorized conversion activities from the last 13 years (since 2005).

There is no publicly accessible Timber Harvest Plan on record from Cal Fire for the subject APN or any of the 3 Timberland Conversion Areas discussed in this report (See Timberland Conversion Evaluation Map for location of Conversion Areas #1 - #3). Previous property owners began converting timbered areas into non-timbered uses at Conversion Area #3 sometime before May of 2014. Conversion activities occurred in both Conversion Areas #1 and #3 after May 2016. Overall, the combined converted areas of approximately 3.0 acres took place in multiple steps between the original conversion prior to May 2014 and sometime after May of 2016.

The current landowner, Kurnishon LLC, purchased the property in 2015 (pers. comm. with landowner). Some unauthorized timberland conversion activity (approximately 0.2 acres) took place under previous ownership but most conversion activity can be attributed to the current landowner.

Timberland Conversion History

Conversion Area #1 appears to have been a small clump of oak trees growing adjacent to a Class III watercourse crossing and a single Douglas-fir. These trees totaled no more than 0.07 acres and were removed sometime after May of 2016 and a retaining pond was installed on or just south of their historic location. The Class III watercourse crossing is still present and empties into the retaining pond which was constructed on the south side of a seasonal road likely at the same time the trees were removed (after May 2016). The Douglas-fir was removed to the north of the seasonal road just northwest of the pond area.

Conversion Area #2 is adjacent to a cultivation site which was constructed on a historic meadow and appears to be multiple tree removals with some possible additional vegetation loss due to a graded fill slope. Trees were removed sometime prior to May 2016 and additional trees were removed sometime after May 2016. During the site visit stumps were only noted along the western side of the cultivation flat below the fill slope but there was a log deck observed on the flat indicating that more trees were removed than was apparent from available historical imagery analysis.

Conversion Area #3 is the largest of the 3 conversion sites currently totaling approximately 2.83 acres. Historically, Conversion Area #3 consisted of approximately 0.47 acres of non-timbered area in the form of historic meadow and Douglas-fir encroachment. Sometime prior to May 2014 this area was expanded to 0.68 acres and prior to May 2016 expanded to 1.08 acres. A final unauthorized conversion occurred (primarily along the northwestern slope) sometime after May 2016 making the total conversion approximately 2.83 acres. The extent of the last conversion was apparent in the visible stumps and a large log deck (Observation Point 3(b)) at the southwest corner of the Conversion Area. There is currently no publicly available orthographic imagery of this final expansion, so acreage was estimated in

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

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 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

uses and agriculture is the secondary use, and in which the protection of the timber and recreational lands is essential to the general welfare”.

A field inspection of the property and conversion area was conducted on June 7, 2018 by representatives of Blair Forestry Consulting LLC. All relevant sites concerning the past conversion areas were examined. Findings from this evaluation are summarized below.

Analysis of Consistency Between Unauthorized Conversion and Applicable California Forest Practice Rules (CFPRs)

Timber Harvesting and Operations

14 CCR 914.1 Felling Practices

14 CCR 914.2 Tractor Operations

14 CCR 914.7 Timber Operations, Winter Period

Although no records of timber harvesting are available for the conversion areas, operations presumably involved hand felling with chainsaws and tractor skidding or piling. Although there are no records of a winter operation plan for the Conversion Areas, the current property owner claims all conversion activities involving timber harvesting and operations occurred during the dry times of the year when the ground was not saturated.

Conversion Area #1 consists of a clump of white and black oaks that were removed from next to the channel of a Class III watercourse and a Douglas-fir tree that was removed from the tree line to the east. Most of the area upstream and immediately surrounding the Class III watercourse crossing (STX1) was already historically non-timbered. At Conversion Area #1, The cut trees (white oak and Douglas-fir) were observed to be piled on the north side of the seasonal road at the conversion site (Observation Point 1(a)). Tractor operations occurred on the road crossing the WLPZ of the Class III watercourse and within the watercourse channel when a retaining pond was constructed below seasonal road crossing STX1 (Observation Point 1(b)). Crossing STX1 and the retaining pond are further addressed in the “Watercourse and Water Resources” section below.

Conversion Area #2 occurred below the fill slope and periphery of a graded area that was historically a meadow. Small Douglas-fir trees were observed to be stacked at the graded site (Observation Point 2(a)). A tractor was used to transport and pile logs. There did not appear to be inconsistencies between unauthorized timberland conversion activities and 14CCR 914.1, 914.2 or 914.7 at Conversion Area #2.

Conversion Area #3 has taken place in multiple steps since sometime before May 2014 and sometime after May 2016. Earlier conversion activities were smaller in size and focused toward the central portion of the current Conversion Area which was historically sparsely stocked with timber. Earlier conversions were conducted outside of the Class II watercourse and lake protection zone (WLPZ) along the eastern boundary of the Conversion Area. Evaluation of a small portion of the more recent larger conversion steps revealed that, at some point, timber operations occurred within the required 75’ no operations WLPZ along the eastern boundary of Conversion Area #3 (Observation Point 3(a)). This was evidenced by tree stumps within this zone and orthographic imagery analysis. RPF recommendations to remediate timber operations within the WLPZ at Conversion Area #3 are discussed in more depth in the Watercourse and water Resources Section below.

Most conversion activity involving timber harvesting and operations has taken place under current ownership. The pond installation violates 14CCR 914 "degradation of the quality and beneficial uses of water". The RPF recommends that the pond (Observation Point 1(b)) at Conversion Area #1 be removed, and the original channel be re-established (discussed in more depth in the Watercourse and Water Resources Section below). There was no direct evidence of other violations concerning 14CCR 914.1, 914.2 and 914.7.

Roads, Soil Stabilization and Erosion Control

14 CCR Article 12 Logging Roads, Landings, and Logging Road Watercourse Crossings
14 CCR 914.6 Waterbreaks

Historic logging operations are responsible for most of the current road system within the subject parcel and roads associated with access to the timberland conversion sites. The property access roads, which also lead to the timberland Conversion Areas, were inspected during the site visit. The property owner, with Green Roads Consulting, is in the process of drafting an Erosion Sediment Control Plan (ESCP, pers. comm. with property owner and Green Roads)) to address roads, landings and watercourse crossings. The ESCP should adhere minimally to all road work rules requirements in 14 CCR Article 12 and 14CCR 914.6.

There are approximately 2,200 feet of seasonal roads accessing Conversion Areas on the parcel which were in decent working condition and did not exhibit excessive scouring on site visit. Rolling dips need to be installed in multiple areas but specifically on the road leading up to Conversion Area #2. Rolling dips need to be installed or enhanced at approaches to watercourses. The RPF agrees with the proposed placement of rolling dips in the development of ESCP (Pers. Comm. Green Roads Consulting).

Landing areas, such as graded cultivation flats represent approximately 2.8 acres and were inspected for soil stabilization, erosion and hydrological disconnect. Conversion Area #1 had surface drainage entering a Class III watercourse from a cultivation flat (Observation Point 1(c)). Conversion Area #2 had man-made drainage ditches running from the cultivation area which then run off the flat down the side of the fill slope/hill (Observation Point 2(b)). The RPF recommends the end of the channels and outlets be armored with rock large enough to stop any scouring and downcutting once water leaves the landing area (4" min.).

There are 3 watercourse crossings (STX1, STX2 and STX3) on the road system accessing the Conversion Areas. STX1 is a Class III watercourse crossing with a 12' CMP which empties into an artificial pond (Observation Point 1(b)) which was recently constructed without permitting. The pond placement is causing sediment to build and is backing up resulting in a failed crossing. Both crossings STX2 and STX3 are undersized and require sizing analysis, proper CDFW permits and ultimately replacement to grade. The RPF agrees with crossing site analysis conducted by Green Roads Consulting. Table 2 below summarizes recommendations in the ESCP concerning Conversion Area access roads, soil stabilization and watercourse crossings.

Table 2.

Conversion Areas (including access roads) Associated with Recommendation	Site I.D.	Description	Recommendation
Conversion Areas #1, #2 and #3	Seasonal Roads accessing Conversion Areas #1, #2, and #3	Road surfaces lack sufficient erosion control	Rolling dips should be installed at approaches to STX2 and STX3. Rolling dips should be installed on road accessing Conversion Area #2
Conversion Area #1	Crossing STX1/Pond (Observation Point 1(b))	A 12" CMP conveys a CIII drainage to an instream pond	STX1/Observation Point 1(b): Infill pond and restore a channel in the path of the original watercourse. Set culvert to grade and rock outlet.
Conversion Area #1	Observation Point 1(c)	graded flat drains to CIII watercourse	Re-grade or install drainage channel around flat, utilize wattles between graded area and Class III watercourse during winter.
Conversion Area #2	Observation Point 2(b)	Drainage ditches running along the cultivation area which then run off the flat down the side of the fill slope/hill	Armor ends of channels and incised areas where water has caused channelization downslope of flat with 4" min. rock
Conversion Area #1	STX2	Undersized 8" CPP	Rolling dips should be installed approximately 100 feet from STX2 and the road should be rocked 25 feet on either side of the crossing. Size, permit, and install adequate crossing at original channel.
Conversion Areas #2 and #3	STX3	Undersized 12" CPP with partially plugged outlet. Culvert not aligned with natural channel. Surface runoff entering Class II watercourse from roads leading to Conversion Area #2.	Size, permit, and install adequate crossing aligned with stream. Rock crossing approximately 100 feet up from crossing. Install rolling dips on both approaches.

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)."

The parcel drains 2 creeks - a Class II and Class III watercourse which drain to the upper reaches of the Mad River, a fish bearing Class I watercourse approximately 2,400 feet downstream.

Conversion Area #1

Conversion Area #1 is on and adjacent to the Class III watercourse at the southeastern corner of the property. Both timber harvesting and tractor operations appear to have taken place within Watercourse

and Lake Protection Zones (WLPZ) of this Class III watercourse. While CFPRs allow timber harvesting within a Class III watercourse zones of traditional Timber Harvest Plans, Timberland Conversion Exemptions under 14CCR 1401.1 do not allow for any harvesting or tractor operations within watercourse protection zones. Additionally, the construction of a retaining pond (Observation Point 1(b)) in the channel of the watercourse violates 14CCR 914 (also discussed in the section above).

The oak tree or trees removed next to the Class III watercourse was minor in scale compared to other conversion activities that have occurred on the property. Because there were such a small number of trees (white oak) removed from the Class III watercourse WLPZ at the time of the pond construction, the RPF is not concerned about re-planting trees in an area where historically there was meadow habitat void of trees. The RPF does recommend that the pond be infilled, and the natural path of the original watercourse be re-established, and banks be seeded and mulched. When the culvert is placed to grade in the channel at STX1, the outlet should be rocked to minimize scouring where the channel is re-established.

Conversion Area #3

Timber harvesting occurred within the WLPZ of a Class II watercourse along the eastern side of Conversion Area #3 during the most recent conversion steps (Observation Point 3(a)). This was apparent from stumps seen within the required 75' WLPZ buffer for Class II streams as determined under 14CCR 916.5 (75' buffer was flagged on site visit). The RPF recommends that the area within 75' from the Class II watercourse transition line be restored to "timberland" as defined by PRC 4526. Immediately mulch and/or seed area to prevent further erosion. Replant area with seedlings to comply with minimum stocking standards of 14CCR 912.7.

Conversion Area #1 and #3 do not comply with 14 CCR 1104.1(a)(2)(F). The RPF recommendations regarding Watercourses and Water Resources are summarized in Table 3 below.

Table 3.

Site ID	Description	Recommendation
Observation Point <u>1(b)</u>	Trees removed and retaining pond constructed within the channel of a Class III watercourse.	Infill pond and restore a channel in the path of the original watercourse. Seed and mulch disturbed soil near channel banks.
Observation Point <u>3(a)</u>	Operations were conducted, and trees were removed from within 75 feet of a Class II Watercourse Protection Zone.	Restore to "timberland" as defined by PRC 4526. Immediately mulch and/or seed area to prevent further erosion. Replant area with Douglas-fir seedlings to comply with minimum stocking standards of 14CCR 912.7.

Hazard Reduction

14 CCR 1104.1(a)(2)(D)(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."

The conversion sites and the surrounding timber stand were walked and assessed for debris resulting from timberland conversion activities. There were notable sites at all 3 Conversion Areas where debris, presumably resulting from nearby conversion activities, was stacked or accumulated. At Conversion Area #1 there is stacked debris along the side of the road (Observation Point 1(a)). At Conversion Area #2, a log deck resulting from timber operations was observed at Observation Point 2(a). At Conversion Area #3 there is a log deck stacked at Observation Point 3(b) there is a stacked log deck likely resulting from activities at Conversion Area #4.

Generally, timber logs resulting from conversion activities was neatly stacked somewhere along the edge of the associated conversion areas indicating that no timber was hauled off of the property. The timber stand surrounding the Conversion Areas was otherwise clean and free of excessive debris.

Recommendations: Cut sawlogs at Observation Sites 1(a), 2(a) and 3(b) to a minimum of 2 feet in length as per 14 CCR 1104.1(a)(2)(D)(1).

Biological Resources

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 October 2, 2018 showed that timber operations could have occurred within the buffer zone of sensitive, rare, threatened, or endangered species or species of special concern. Although no sensitive species were observed during the site visit, the CNDDDB query showed 3 species that could be negatively affected by unauthorized timberland conversion, timber harvesting within the WLPZ of watercourses and the construction of a pond in the channel of a watercourse.

There is a northern spotted owl (NSO) Activity Center (AC - HUM0019) to the northeast of the property within 0.7 miles of all 3 Conversion Areas. The AC and related sightings are all from within United States Forest Service (USFS) land over a ridge (Eightmile Ridge) in the Pilot Creek drainage. According to the CNDDDB, the last known positive sighting of a northern spotted owl associated with this AC was on August 20, 2001. Typically, when a timber harvest plan is developed in this region of California, ACs fall under USFWS Attachment B protection measures which considers habitat retention within 1.3 miles from an AC. Due to the distance from the known NSO AC and available suitable habitat surrounding the site within its range, it is reasonable to conclude that no impacts have occurred from the small relative size of conversion of this property.

Approximately 2,400 feet downstream from watercourses where timber operations occurred, the Mad River hosts summer-run steelhead trout (*Oncorhynchus mykiss irideus* -pop. 36). Harvesting trees within

the WLPZ of a Class II and Class III watercourse and constructing retaining pond in the channel of a Class III watercourse can negatively impact endangered salmonid species by increasing sediment load contributed downstream. The RPF recommendations of reforesting WLPZ zones where trees were harvested and removing the pond from the watercourse channel of a Class III watercourse and restoring the natural channel will help to mitigate negative impacts.

A population of Oregon goldthread (*Coptis laciniata*), with a California Rare Plant Ranking (CRPR) of 4.2, is presumed to be extant around where conversion activities occurred. This plant occurs around meadows and seeps and North Coast coniferous forest and is potentially threatened by erosion and timber harvest activities (CNPS 2018). No Oregon goldthread was observed during the site visit. Given the large occurrence indicated on the CNDDDB map and the relatively small scale of the conversion activities, it is unlikely that this conversion negatively affected this occurrence. A copy of the CNDDDB map generated by this query is included in this report.

Conversion activities did not appear to have altered habitat for other non-listed species of wildlife (i.e. no evidence of felled snags). Additionally, there is abundant wildlife habitat elsewhere on the property in the form of tree cavities and grazing/foraging sites.

Although unauthorized timberland conversion activities did not take into consideration compliance with 14 CCR 1104.1 (2)(H), after mitigation recommendations described in this report are applied, it is unlikely that rare, threatened or endangered biological resources will be significantly negatively impacted.

Cultural Resources

14 CCR 1104.1 (2)(1): "No timber operations are allowed on significant historical or archeological sites."

No archeological sites were observed during the conversion evaluation. All relative Native American entities have been notified of the operation activities.

The conversion area appears to comply with 14 CCR 1104.1 (2)(1). No recommendation is suggested regarding cultural resources.

Summary of Recommendations

Overall, it is the opinion of the RPF that the past unauthorized conversion activities did not entirely meet the standards set forth in the CFPRs and requires the following mitigation recommendations:

- 1. Roads, Soil Stabilization and Erosion Control**
 - Address items in **Table 2** above and shown on the Conversion Evaluation Map at the end of this report.
- 2. Watercourse and Water Resources**
 - Address items in **Table 3** above and shown on the Conversion Evaluation Map at the end of this report.
- 3. Hazard Reduction**

- Address log decks at Observation Points 1(a), 2(a) and 3(b) as described in the Hazard Reduction section above.

Site Maps

General Location Map: Shows ownership boundary in proximity to recognizable landmarks and general location of property boundary.

Timberland Conversion Evaluation Map: Location of timber conversion operations, Boundary of the conversion area, location and classification of watercourses, Observation Sites and roads.

California Natural Diversity Database (CNDDDB) Project Location Map: Location of timber conversion in relation to biological resources.

Resources

California Forest Practice Rules 2017. Sacramento: CAL FIRE, 2017. Print.

California Natural Diversity Database. California Department of Fish and Wildlife. Web. <https://www.wildlife.ca.gov/Data/CNDDDB>. Version 5.56.24. Accessed October 8, 2018.

California Native Plant Society, Rare Plant Program. 2018. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Website <http://www.rareplants.cnps.org> [accessed 09 October 2018].

Forest Practice Watershed Mapper v2. CAL FIRE. Web. http://egis.fire.ca.gov/watershed_mapper/. Accessed August 10, 2018.

Humboldt County Web GIS. County of Humboldt. Web. <http://webgis.co.humboldt.ca.us/HCEGIS2.0/>. Accessed September 18, 2018.

Google Earth Pro

PHOTOS



Photo 1. Observation Point 1(a) at Conversion Area #1 – Cut white oak and Douglas-fir trees stacked.



Photo 2. Looking upstream of the Class III watercourse from at watercourse crossing STX1 at Conversion Area #1.



Photo 3. Looking south at retaining pond constructed in channel of Class III watercourse (Observation Point 1(b)) from crossing STX1 at Conversion Area #1.

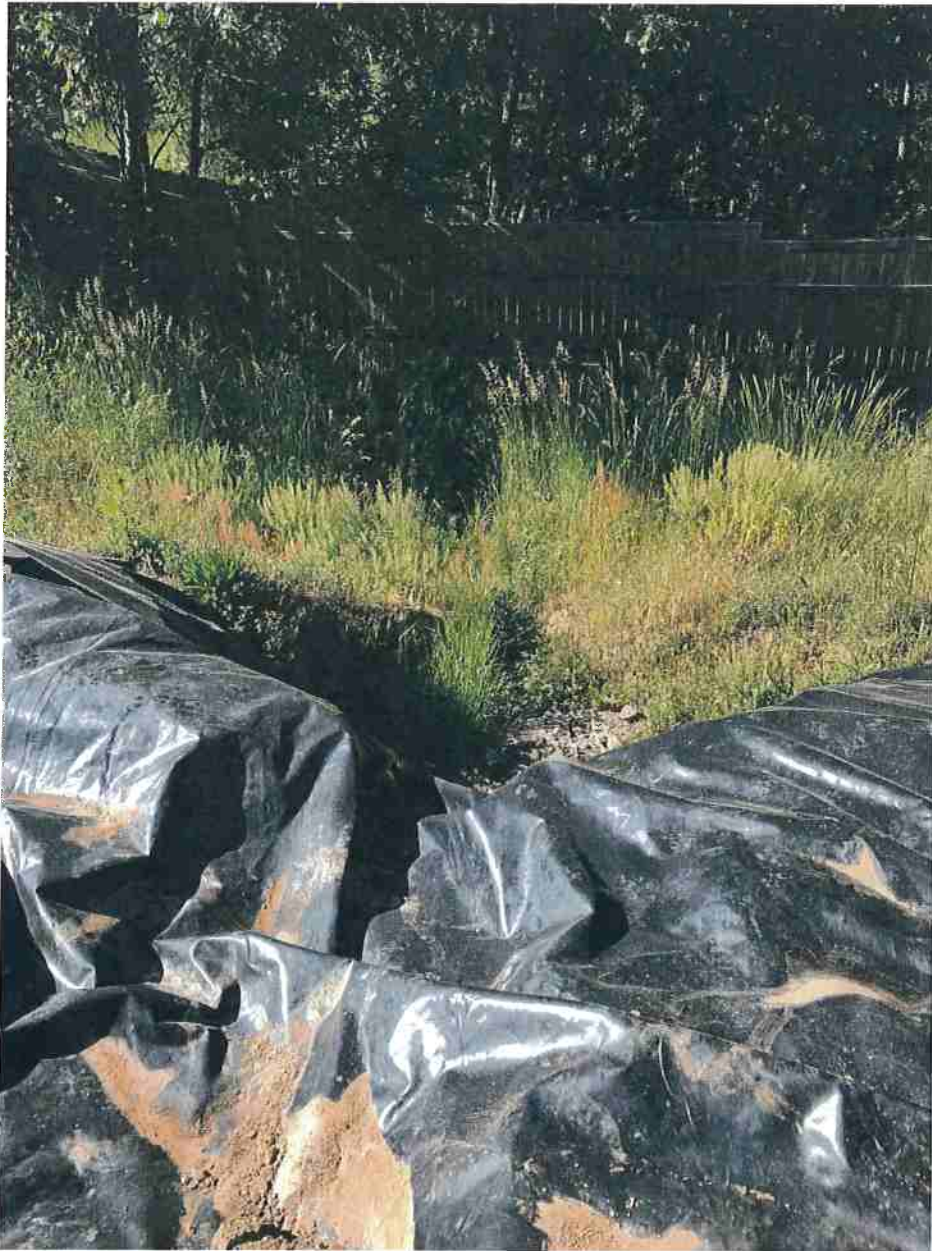


Photo 4. Looking south at spillway to Class III channel from retaining pond (Observation Point 1(b)) at Conversion Area #1.

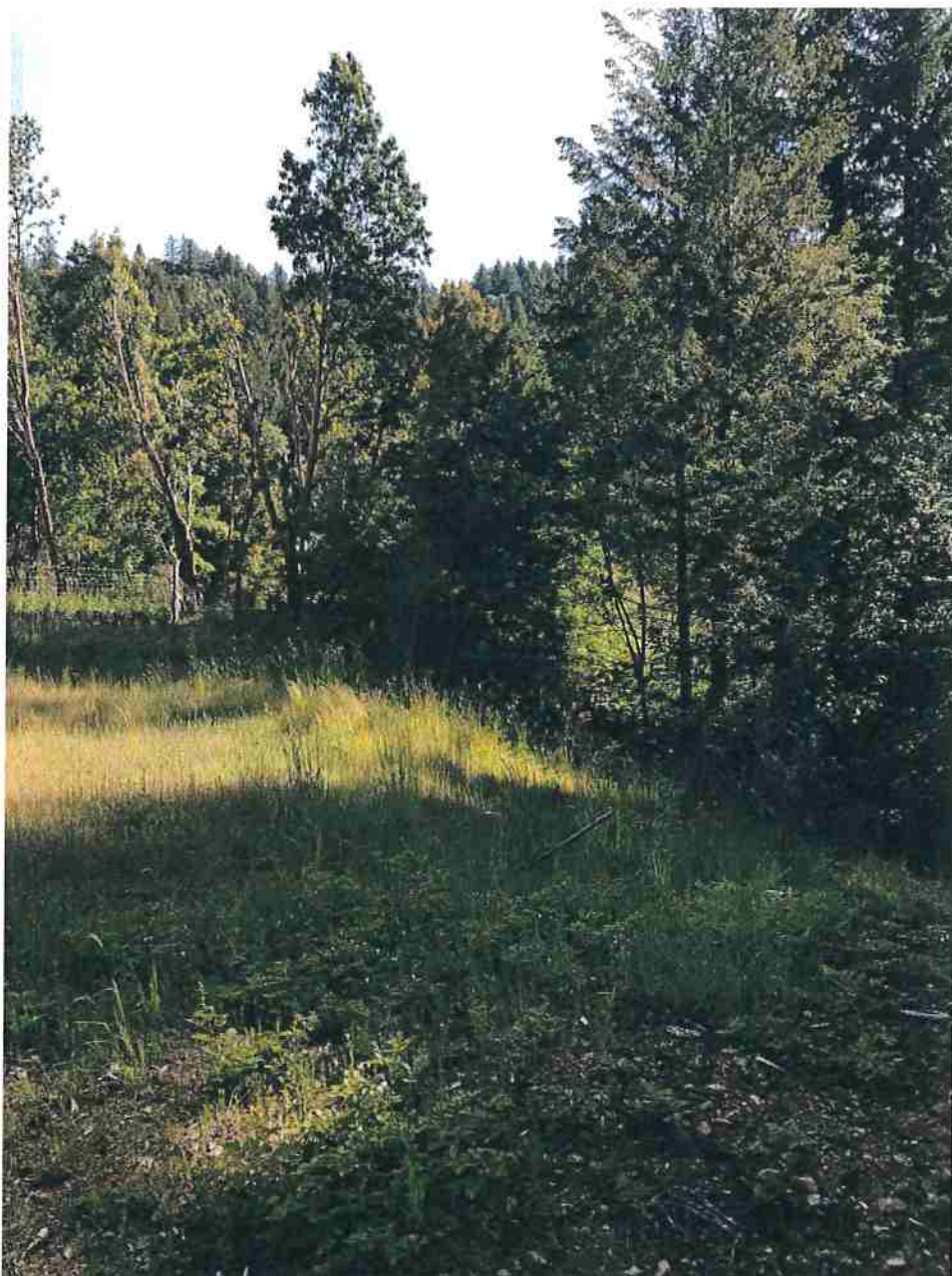


Photo 5. Class II WLPZ area along the eastern boundary of Conversion Area #3 (Observation Point 3(a)).

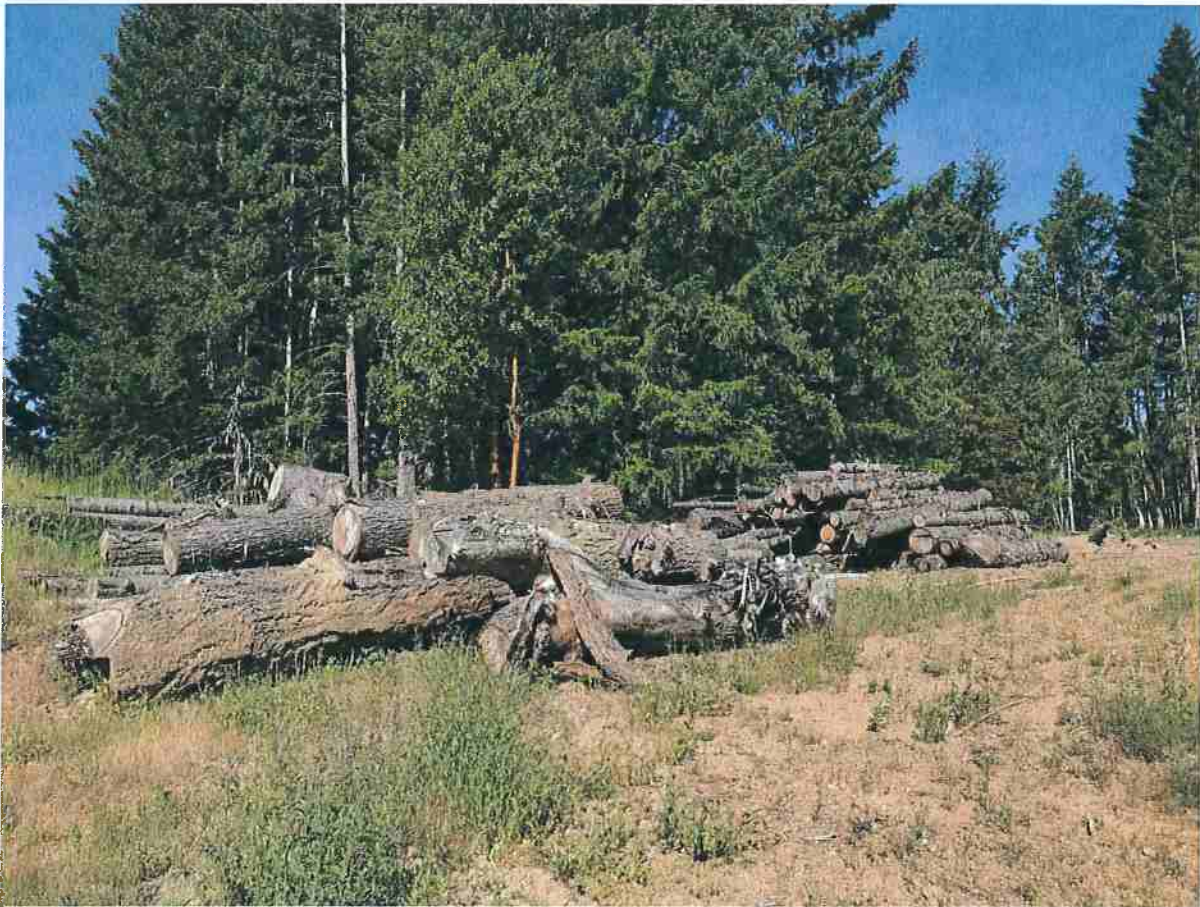


Photo 6. Observation Point 3(b) – log deck from timber operations conducted at Conversion Area #3.



Photo 7. Stumps resulting from timberland conversion activities on the western slope of Conversion Area #3.



Photo 8. Looking down at Conversion Area #3 from the northwest corner. The log deck (Observation Point 3(b)) can be seen along the south side of the Conversion Area.



Photo 9. Conversion Area #2 where trees were removed below the fill slope of graded area.



Photo 10. Gullying/rutting occurring along the fill slope of grading above Conversion Area #2 (Observation Point 2(b)) from water running off of the graded area.



Photo 11. Observation Point 2(b) – drainage ditch constructed to drain cultivation area off of fill slope at Conversion Area #2.



Photo 12. End of Observation Point 2(b) where water runs down fill slope of graded flat at Conversion Area #2.



Photo 13. Observation Point 2(a) – log deck resulting from conversion activities at Conversion Area #2.

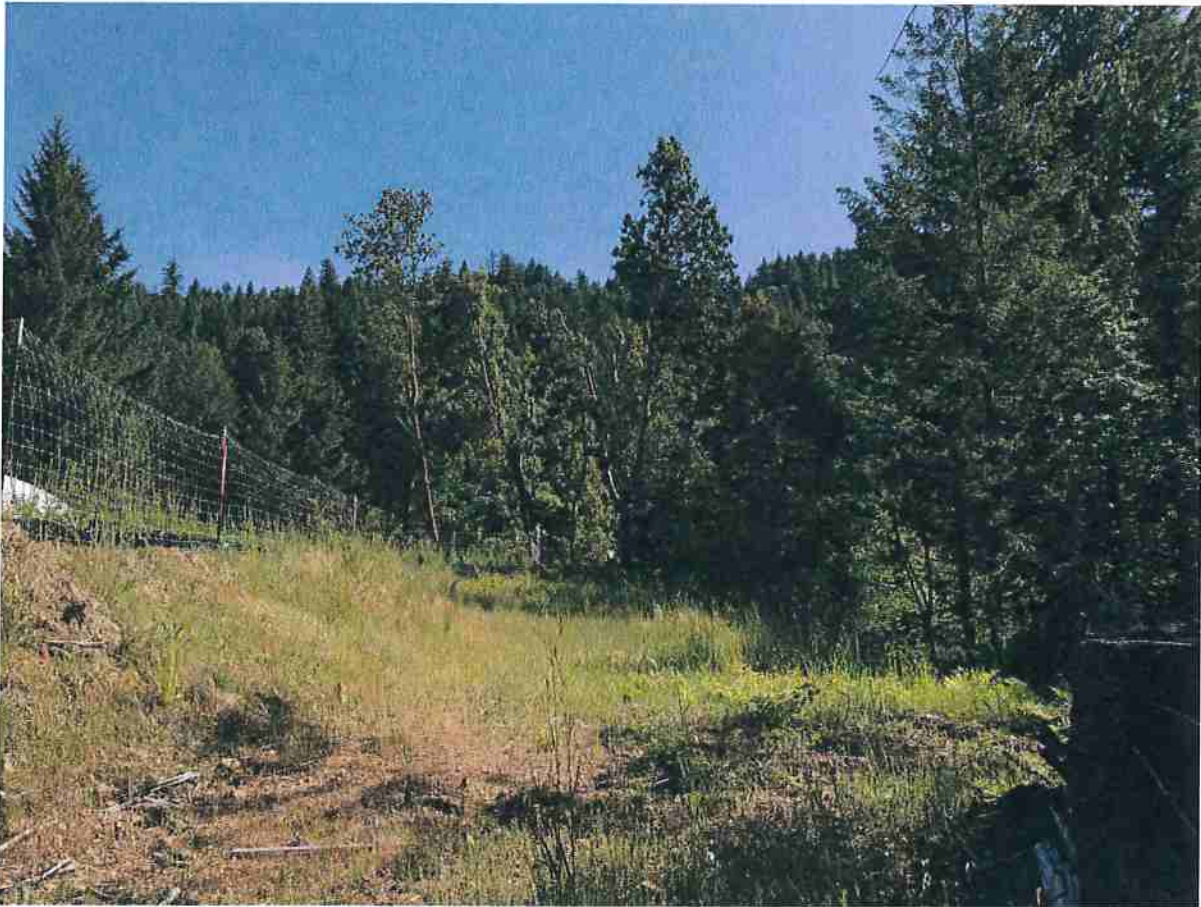


Photo 14. Observation Point 3(a) looking north where timber was cut within 75' of a Class II watercourse. (note the pink flag line on the left at 75').



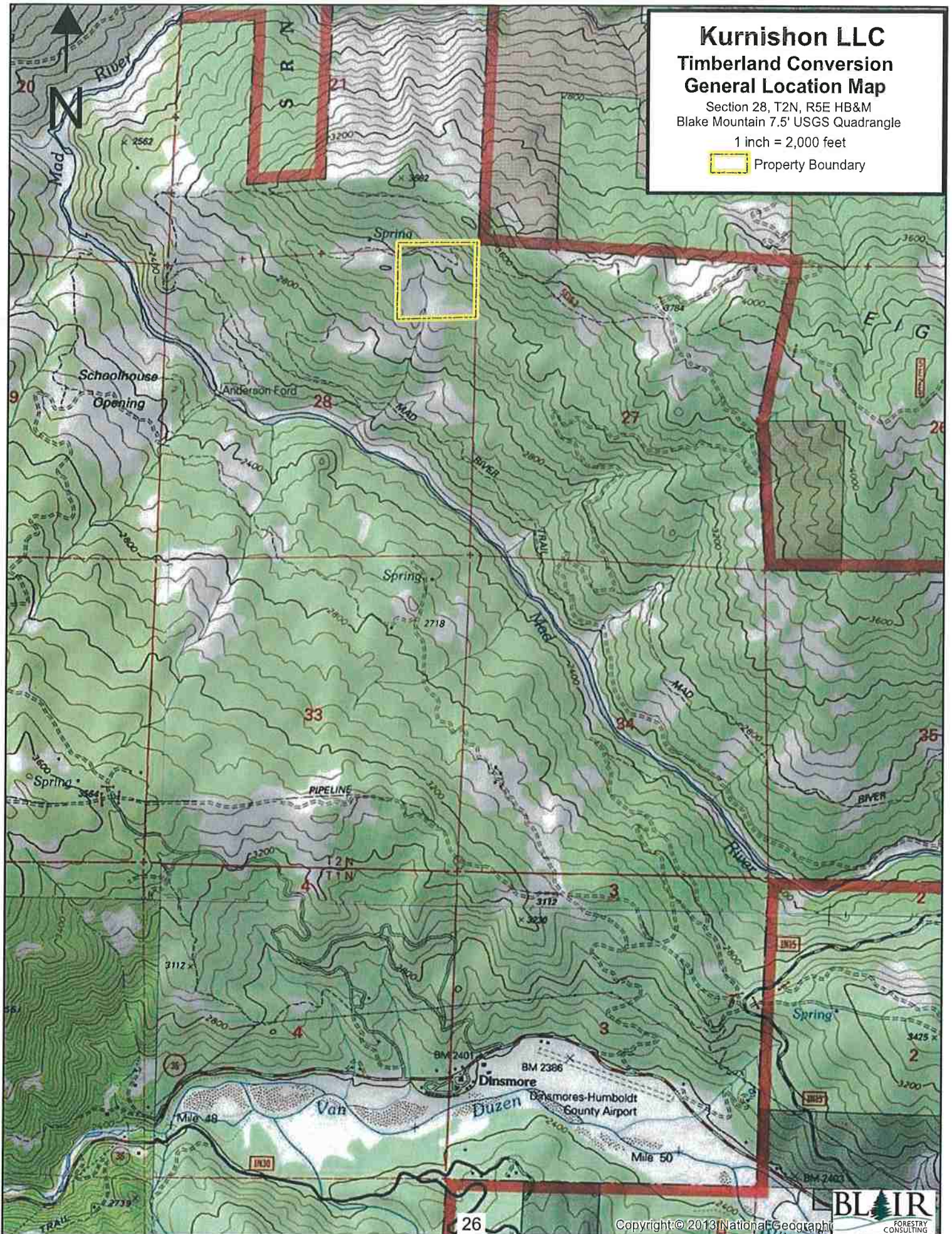
Photo 15. Observation Point 3(a) looking south where timber operations occurred within 75' of a Class III watercourse (pink flags hung at 75')

Kurnishon LLC Timberland Conversion General Location Map

Section 28, T2N, R5E HB&M
Blake Mountain 7.5' USGS Quadrangle

1 inch = 2,000 feet

 Property Boundary

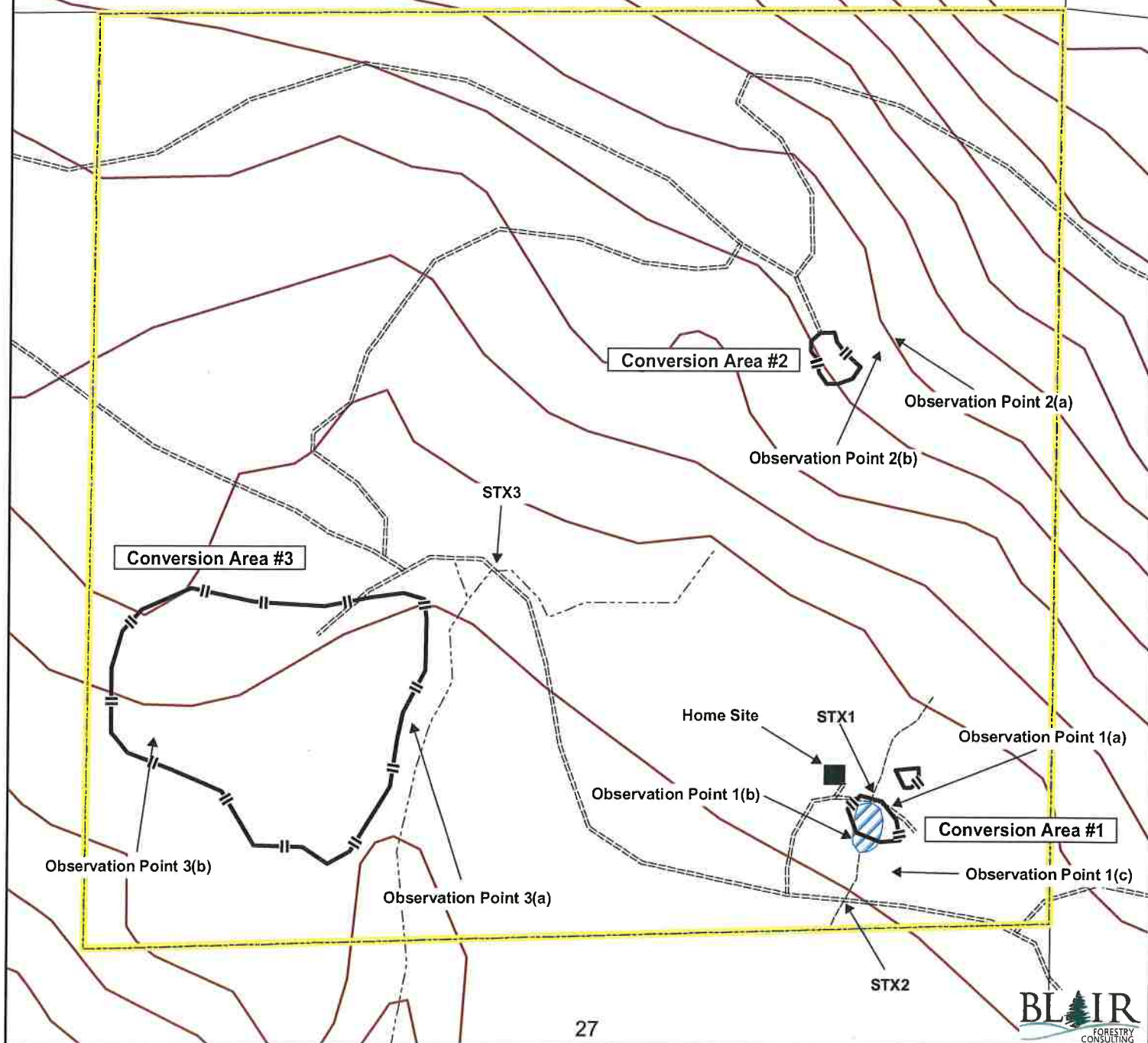




Kurnishon LLC Timberland Conversion Evaluation Map

Section 28, T2N, R5E HB&M
Blake Mountain 7.5' USGS Quadrangle
1 inch = 200 feet

- Property Boundary
- Converted Areas
- Seasonal Road
- Class II Watercourse
- Class III Watercourse
- Pond - Observation Point 1(b)



Spotted Owl Observations
[ds704]

- Positive Observation
Negative Observation
Activity Center
Not Valid Activity Center
Abandoned

California Natural Diversity
Database (CNDDB) Commercial
[ds85]

-
- Plant (80m)
- Plant (specific)
- Plant (non-specific)
- Plant (circular)
- Animal (80m)
- Animal (specific)
- Animal (non-specific)
- Animal (circular)
- Terrestrial Comm. (80m)
- Terrestrial Comm. (specific)
- Terrestrial Comm. (non-specific)
- Terrestrial Comm. (circular)
- Aquatic Comm. (80m)
- Aquatic Comm. (specific)
- Aquatic Comm. (non-specific)
- Aquatic Comm. (circular)
- Multiple (80m)
- Multiple (specific)

