



Providing Professional Forestry Services

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December 23, 2019

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 APNs 220-292-015, 220-292-017, 220-292-018 and 107-300-008. 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, General Location Map, Timberland Conversion Overview and Evaluation Maps, CNDDDB Map, Photos

Timberland Conversion Evaluation Report

December 23, 2019

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): **Humboldt Gardens LLC**
Phone: **(925) 595-0704**
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

Address: **2000 Block of Panther Gap Rd.**
Honeydew, CA 95545

Legal Description: **Sections 27 and 34; T2S; R1E; HB&M; Humboldt County**

Assessor's Parcel Numbers (APNs): **107-233-010, 107-233-013, 107-234-014**

Parcel Sizes (Assessed): **APN 107-233-010 – 40 acres, APN 107-300-008 – 66.64 acres, APN 107-233-013 - 155 acres, APN 107-234-014 – 88.5 acres; Total Acreage = 283.5 acres**

Acres of Timberland Converted (Combined): **Approximately 5.4 acres**

Project Description

Property and Timberland Conversion History

Note: Property boundaries are not based on the Humboldt County Assessor's APN parcel maps as this information was found to be inaccurate. Assessor's Parcel data in the County GIS mapping program differed significantly geographically and the parcel boundaries depicted are the result of recent survey data and estimated parcel boundaries based on known ownership details. 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 12 years (since 2008).

No publicly available completed or approved Timber Harvest Plans are on record from Cal Fire for the subject APNs or any of the 8 Timberland Conversion Sites discussed in this report (See Timberland Conversion Overview Map for location of Conversion Sites #1 - #8). There is currently a THP (THP 1-18-064-HUM – ABC Tree Farm THP) proposed on APN 107-300-008 which is associated with Conversion Site 8 however, however it was not approved as of the submittal of this report.

The current landowner purchased 3 of the parcels between the years of 2007 and 2008 and most recently acquired APN 107-300-008 in 2017 (pers. comm. with landowner). Aerial imagery indicates that timberland conversion activities for cultivation appear to have started sometime prior to June 2009 on all 4 subject parcels and at all 8 conversion sites. Conversion Sites 1 and 7 appear to have been expanded on between June and September of 2010 and Conversion Site 8 was expanded to its current size between 2014 and 2016. Overall, the combined converted areas totaling approximately 5.4 acres took place in multiple steps between 2009 and 2016. Conversion Site 6 is no longer planned to be used for cultivation.

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

Table 1. Summary of Conversion History

Conversion Site ID	Acreage(s)	Associated APN	Date(s) of Completion
Site #1	0.7	107-233-010	Prior to June 2009 and expanded on prior to September 2010
Site #2	0.4	107-233-013	Prior to June 2009
Site #3	0.5	107-233-013	Prior to June 2009
Site #4	0.5	107-233-013	Prior to June 2009
Site #5	0.4	107-233-013	Prior to June 2009
Site #6	0.6	107-233-013	Prior to June 2009
Site #7	0.9	107-234-014	Prior to June 2009 and expanded on prior to September 2010
Site #8	1.4	107-300-008	Prior to June 2009 and expanded on prior to 2016
TOTAL CONVERSION AREA	5.4 acres		

Timber Stand Description

The property around the conversion areas is dominated by 40 to 60-year-old Douglas-fir with understory comprised of younger Douglas-fir, tanoak, live oak 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 or oak woodland. The timber stands around the conversion areas appear healthy with adequate conifer stocking in most areas and sub-optimal stocking in others where historically poor forest management practices have favored tanoak dominance.

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

Unauthorized timberland conversion totaling approximately 5.4 acres occurred on the parcel between the years of 2009 and 2016 (See Timberland Conversion Evaluation General Location Map). As part of the commercial cannabis cultivation permitting process with the Humboldt County Planning Department and State agencies, the current landowners seek a Registered Professional Forester's (RPF's) recommendations as to remedial actions necessary, if any, to bring the conversion area into compliance with provisions of the Forest Practices Act, specifically 14 CCR 1104.1.

This Timberland Conversion Evaluation focused primarily on unauthorized timberland conversion activities associated with current and retired cannabis cultivation sites and inconsistencies with the requirements of the California Forest Practice Rules (CFPRs). Timberland conversion sites 1, 4, 5, 6 and 7 are generally associated with a ridgeline whereas Conversion Sites 2, 3 and 8 are located on a west facing hillslope. The combined acreage of the eight (8) Conversion Sites inspected during this evaluation is greater than the Less Than 3-acre maximum Conversion Exemption allowed under 14 CCR 1104.1. Conversion Site 6 is no longer used for cultivation and could be remediated (abandoned and re-stocked)

Humboldt County has zoned these parcels **Timber Production Zone (TPZ)** which is defined as – established under the Timberlands Preservation Act (California Government Code Section 51113), a zoning district to designate and set standards in areas designated for growth, harvesting, and production of timber, timber products, and other compatible uses.

Field inspections of the Conversion Sites were conducted on January 30 and December 18, 2019 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 area, operations presumably involved hand felling with chainsaws, tractor skidding and piling. The Conversion Sites are all located in areas where logging has historically occurred. Trees felled included Douglas-fir, black oak, white oak and madrone.

Tractor operations, including tree removal and grading, took place within the Watercourse and Lake Protection Zone (WLPZ) of a Class III/Class II watercourse at Conversion Site 8 (Observation Point 8(a)) which is inconsistent with 14CCR 914.2(a) - 914 "Timber operations should be conducted to...prevent degradation of the quality and beneficial uses of water...". Some of this area is also within an unstable area associated with a California Geological Survey (CGS) mapped unstable area. These operations are discussed in the Roads, Soil Stabilization and Erosion Control and the Watercourse and Water Resources sections below.

Although there are no records of a winter operation plan for the Conversion Sites, the current property owner claims all conversion activities on Conversion Sites 1-7 involving timber harvesting and operations occurred during the dry times of the year when the ground was not saturated. It is unknown what time of year operations occurred at Conversion Site 8.

No recommendations are suggested regarding Timber Harvesting and Operations.

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 parcels and roads associated with access to the timberland Conversion Sites. Roads that access timberland Conversion Sites throughout the property were inspected for consistency with 14 CCR 923.5 regarding erosion control for logging roads. There are approximately 2 miles of seasonal roads (Roads A, B, C and D) associated with access to Conversion Sites between the 4 parcels which were in operating condition during the winter site visit but did exhibit poor drainage in some areas. Soils in the area are generally rocky and road placement on the topography is generally above major drainages. The road accessing Conversion Site 3 (Road C) may have been constructed or re-constructed.

The property owner, with Green Roads Consulting, is in the process of conducting a detailed road assessment for all 4 parcels addressing road conditions, drainage and functionality (pers. comm. with property owner and Green Roads Consulting). Proposed mitigation measures should adhere minimally to all erosion control requirements in 14 CCR Article 12 (923.5 specifically).

Historic logging operations are also responsible for landing areas that have been expanded on (likely at Conversion Sites 2 and 5). Graded cultivation flats on timberland Conversion Sites were inspected for consistency with CFPs 14 CCR 923.5 regarding erosion control for landings. Erosion control measures such as wattles, sandbags, tarps covering exposed soil and seeding and mulching were evident on graded flats throughout the property. The following Observation Points outlined below in **Table 2** were observed during the site visit to not meet the standards of 14 CCR Article 12 – Logging Roads, Landings and Logging Road Watercourse Crossings. Observation Point locations can be found on the Timberland Conversion Evaluation Maps 1-3.

Table 2. RPF Recommendations Concerning Roads, Soil Stabilization and Erosion Control

Conversion Sites and/or Access Roads	Observation Point/ I.D.	Description	Recommendation
Conversion Site 1	Observation Point 1(a)	Erosion and minor downcutting observed on graded area fillslope	Site has already been somewhat winterized with wattles and mulched but run-off is still concentrating in this area. Re - seed and mulch fillslope and add additional wattles. Monitor winter run-off and add additional erosion control measures as necessary including rock.
Conversion Site 2 – Road A	Observation Point 2(a)	During wet season cutbank seep runs north on Road B surface to graded area at Conversion Site 2	Install waterbar/rolling dip on Road B just north of cutbank seep and rock armor outlet and road surface.
Conversion Site 5	Observation Point 5(a)	Old skid trail through-cut into hill slope going northeast up ridgeline from graded flat. Incised channeling observed only at the very base where it meets Conversion Site 5	Rock armor incised channel 10 feet up from landing. Monitor - Although channeling was observed at base of skid road through-cut, no additional erosion hazard was observable on landing or adjacent roads beyond that point. Through-cut skid trail is re-vegetating and growing conifers. If site changes - access old skid road from above at northeast end and waterbar skid trail to decrease water concentration and install erosion control at base as needed.
Conversion Site 8	Observation Point 8(a)	Trees were removed and grading occurred within the WLPZ of Class II and Class III watercourse. Grading resulted in perched fill along north side of stream bank in multiple locations.	Pull perched fill along south side of graded conversion flat back away from edge of watercourse and slope to a natural gradient as possible. Replant conversion area along north side of watercourse from watercourse transition line with Douglas-fir (out to a minimum of 50 feet slope distance for Class III and 75 feet slope distance for Class II). Replant area with seedlings to comply with minimum stocking standards of 14CCR 912.7 (12' x 12' spacing). Immediately mulch and/or seed area to prevent erosion.

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)."

Portions of APNs 107-300-008, 107-233-013 and 107-234-014 are in the upper reaches of Dry Creek, a Class I tributary to the Mattole River (based on NOAA Class I gradient extent layer). All parcels contain unnamed Class II and Class III watercourses that all drain to Dry Creek. Areas adjacent and downslope from the timberland Conversion Sites were surveyed for the presence of Class I through Class IV waters and domestic water sources.

For Less Than 3 Acre Exemptions (14CCR 1104.1) in areas of Humboldt County zoned TPZ, the Humboldt County Planning and Building Department defers to the California Forest Practice Rules and requires "No Timber Operations" Watercourse and Lake Protection Zone (WLPZ) buffer widths be established by 14CCR 916.5. As stated in the Timber Harvesting and Operations section above - Tractor operations associated with tree removal and grading occurred within the WLPZ and channel of a Class III and Class II watercourse at Conversion Site 8 (Observation Point 8(a)).

Conversion Site 8 does not comply with 14 CCR 1104.1(a)(2)(F) regarding operations within a WLPZ. The RPF recommends that, where feasible, perched fill along south side of graded conversion flat edge be pulled back away from edge of watercourse and sloped to a natural gradient as possible. Replant conversion area along north side of watercourse from watercourse transition line with Douglas-fir (out to a minimum of 50 feet slope distance for Class III and 75 feet slope distance for Class II). Replant area with seedlings to comply with minimum stocking standards of 14CCR 912.7 (12' x 12' spacing). Immediately mulch and/or seed area to prevent erosion (same recommendation found in Table 2. Concerning Roads, Soil Stabilization and Erosion Control).

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. Three (3) Hazard Reduction Sites were observed on Conversion Sites 3, 4 and 7 where debris, presumably resulting from nearby conversion activities, was stacked or accumulated. Generally, timber logs and slash debris resulting from conversion activities were stacked and piled 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 for hazard reduction associated with timberland conversion activities is outlined in **Table 3** below. Locations of the Observation Points can be found on the Timberland Conversion Evaluation Maps 1-3.

Table 3. Recommendations Actions Concerning Hazard Reduction

Conversion Site	Observation Point	Description	Recommendation
Conversion Site 3	3(a)	Slash pile and woody debris resulting from timberland conversion activities along edge of Conversion Site at mapped location	Cut sawlogs to a minimum of 2 feet in length as per 14 CCR 1104.1(a)(2)(D)(1). Obtain proper county burn permits and burn remaining slash during rainy period.
Conversion Site 4	4(a)	Slash pile and woody debris resulting from timberland conversion activities along edge of Conversion Site below fillslope at mapped location	Cut sawlogs to a minimum of 2 feet in length as per 14 CCR 1104.1(a)(2)(D)(1). Obtain proper county burn permits and burn remaining slash during rainy period.
Conversion Site 7	7(a)	Slash pile and woody debris resulting from timberland conversion activities below fillslope	None – debris not accessible by CAT without creating potential erosion hazard.
Conversion Site 8	8(b)	Slash pile and woody debris resulting from timberland conversion activities below fillslope	Cut sawlogs to a minimum of 2 feet in length as per 14 CCR 1104.1(a)(2)(D)(1). Obtain proper county burn permits and burn remaining slash during rainy period.

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 (CNDDB) on July 26, 2019 showed no observations of sensitive, rare, threatened, or endangered species (RTES) or species of special concern (SSC) within the general area or adjacent to any of the seven (7) Conversion Sites. This does not imply that RTES or SSC were not currently, or historically, present in this area or that conversion activities did not negatively affect these species. Without survey data for the presence of these species prior to timberland conversion activities, or a biological assessment investigating the current likelihood of the presence of RTES and SSC, it is impossible to know if conversion activities - specifically tree removal - negatively affected them.

Less Than 3 Acre Conversion Exemptions under 14 CCR 1104.1 are generally exempt from biological surveys but require that disturbance to any known or discovered sensitive, rare, threatened, or endangered species (RTES) or species of special concern (SSC) be avoided. There were no observations of RTES or SSC within or adjacent to the Conversion Area.

The Conversion Sites do not appear to conflict with 14 CCR 1104.1 (2)(H). No recommendation is suggested regarding biological resources.

Cultural Resources

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

This area is thought to have been settled by the native Athapaskan language speaking group known as the Lolankok Sinkyone near the interface with the Mattole tribal territory. Multiple Conversion Sites are located on a prevailing ridgeline that runs north through the parcels up from the Dry Creek drainage toward Panther Gap. It is likely that this ridgeline was used for travel into and out of the Mattole River Basin. Conversion Sites along the ridgeline were inspected for archaeological artifacts during the site visit. No artifacts were observed.

All relative Native American entities have been notified of the timberland conversion activities. 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 Maps at the end of this report.
- 2. Watercourse and Water Resource**
 - See above recommendation in Table 2 for Observation Point 8(a).
- 3. Hazard Reduction**
 - Address items in **Table 3** above and shown on the Conversion Evaluation Map at the end of this report.

Site Maps

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

Conversion Evaluation Overview Map: Shows 3 subject parcels, timberland conversion sites and location of roads.

Timberland Conversion Evaluation Maps (1-3): 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 2019. Sacramento: CAL FIRE, 2019. Print.

California Natural Diversity Database. California Department of Fish and Wildlife. Web. <https://www.wildlife.ca.gov/Data/CNDDDB>. Version 5.77.14. Accessed July 26, 2019.

California Native Plant Society, Rare Plant Program. 2019. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Website <http://www.rareplants.cnps.org> [accessed 21 May 2019].

Forest Practice Watershed Mapper v2. CAL FIRE. Web. http://egis.fire.ca.gov/watershed_mapper/. Accessed July 8, 2019.

Handbook of North American Indians: volume 8 – California, Robert Heizer - 1978

Humboldt County Web GIS. County of Humboldt. Web. <http://webgis.co.humboldt.ca.us/HCEGIS2.0/>. Accessed January 15, 2019 and July 26, 2019.

Google Earth Pro

PHOTOS

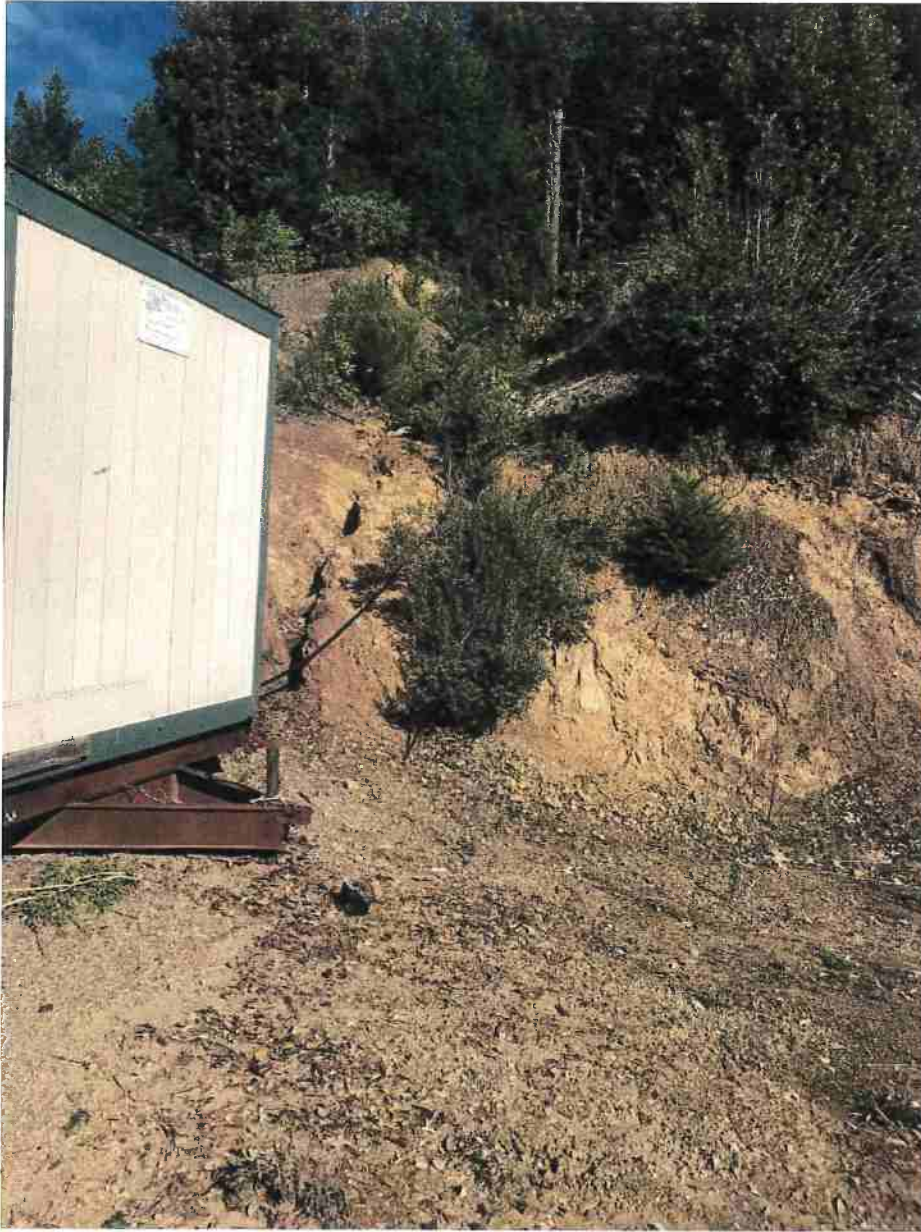


Photo 1. Observation Point 5(a). Downcutting at the base of historic through-cut skid trail where it meets cutbank at Conversion Site 5.



Photo 2. Erosion control measures at Conversion Site 5.



Photo 3. Observation Point 3(a) at Conversion Site 3 – Hazard Reduction.



Photo 4. Observation Point 3(a) at Conversion Site 3 – Hazard Reduction.



Photo 5. Conversion Site 3 – Erosion control structures surround site.



Photo 6. Observation Point 2(a) – looking south, cutbank seep on and water running north toward Conversion Site 2.



Photo 7. Observation Point 2(a) – looking north, water from cutbank seep running north toward Conversion Site 2.



Photo 8. Observation Point 7(a) – Hazard reduction at Conversion Site 7 difficult to reach without soil disturbance.



Photo 9. Observation Point 4(a). Hazard reduction at Conversion Site 4.



Photo 10. Observation Point 1(a) – Fillslope erosion point.



Photo 11. Hazard reduction at Conversion Site 8.



Phot0 12. Observation Point 8(a) where operations occurred within Class II watercourse WLPZ.



Photo 13. Perched fill and area where operations occurred in Class III WLPZ at Observation Point 8(a).

Humboldt Gardens LLC Timberland Conversion Parcel General Location Map

Sections 27 and 34; T2S; R1E; HB&M
Bull Creek 7.5' USGS Quadrangle

1 inch = 3,000 feet

Parcel Boundaries



APN 107-300-008

APN 107-233-010

APN 107-233-013

APN 107-234-014



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




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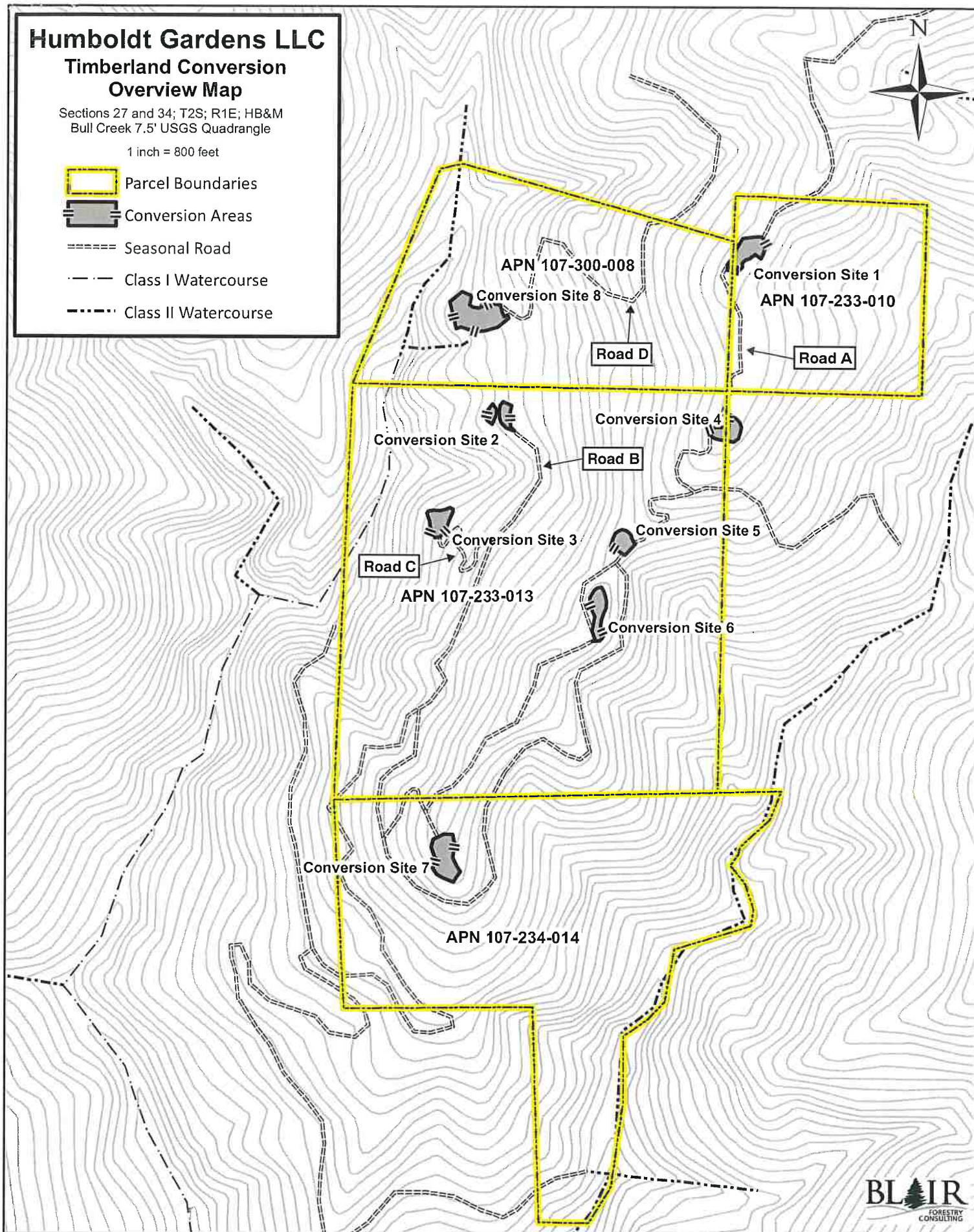
Humboldt Gardens LLC

Timberland Conversion Overview Map

Sections 27 and 34; T2S; R1E; HB&M
Bull Creek 7.5' USGS Quadrangle

1 inch = 800 feet

-  Parcel Boundaries
-  Conversion Areas
-  Seasonal Road
-  Class I Watercourse
-  Class II Watercourse

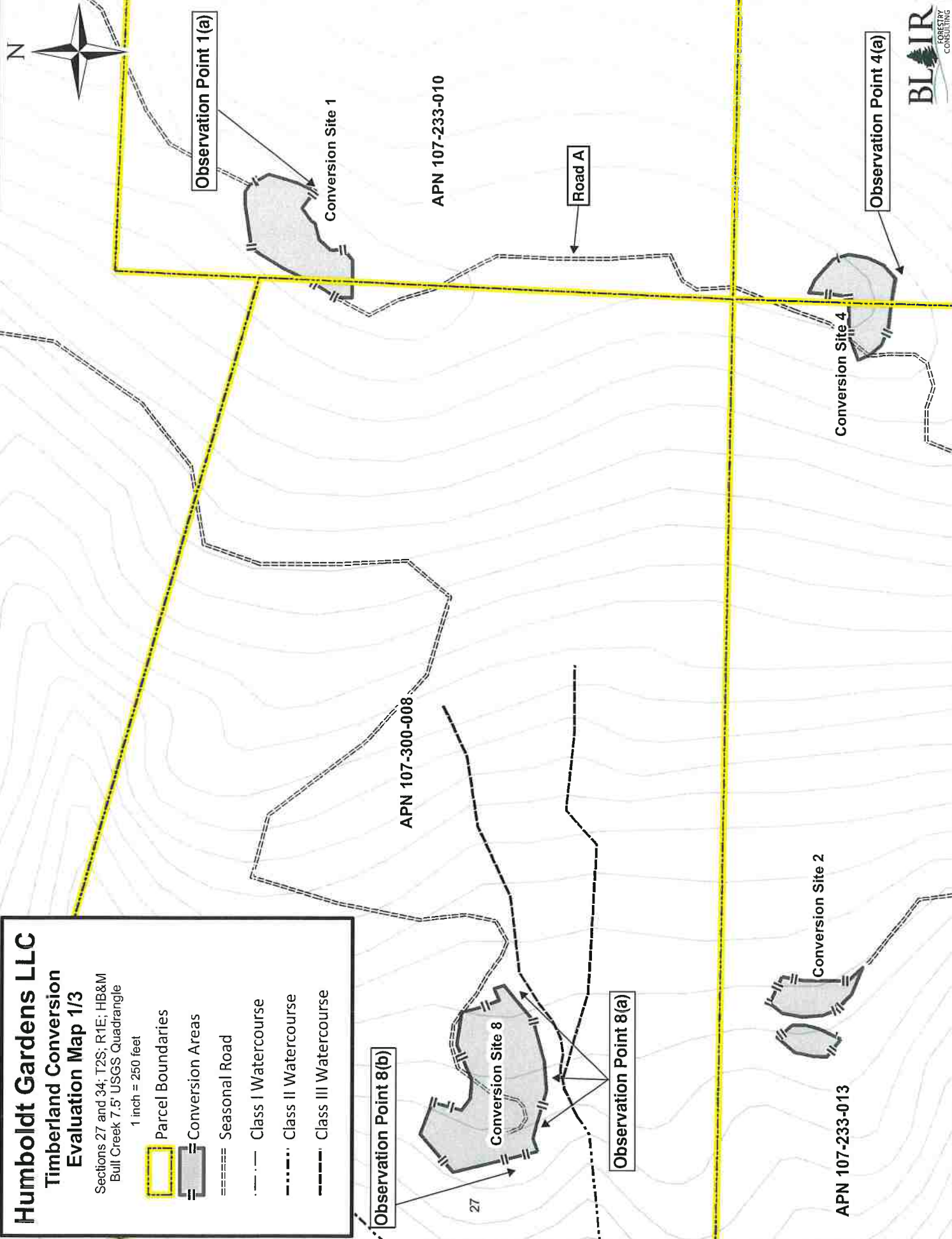


Humboldt Gardens LLC Timberland Conversion Evaluation Map 1/3

Sections 27 and 34; T2S; R1E; HB&M
Bull Creek 7.5' USGS Quadrangle

1 inch = 250 feet







- Parcel Boundaries
- Conversion Areas
- Seasonal Road
- Class I Watercourse
- Class II Watercourse
- Class III Watercourse



Humboldt Gardens LLC Timberland Conversion Evaluation Map 2/3

Sections 27 and 34; T2S; R1E; HB&M
Bull Creek 7.5' USGS Quadrangle

1 inch = 250 feet

-  Parcel Boundaries
-  Conversion Areas
-  Seasonal Road
-  Class II Watercourse
-  Class III Watercourse
-  Historic Throughcut Skid Trail

APN 107-233-013

Observation Point 3(a)

Conversion Site 3

Road C

Road B

Observation Point 2(a)

Conversion Site 2

Observation Point 5(a)

Conversion Site 5


Road A

Conversion Site 6


Humboldt Gardens LLC Timberland Conversion Evaluation Map 3/3


Sections 27 and 34; T2S; R1E; HB&M
Bull Creek 7.5' USGS Quadrangle

1 inch = 250 feet

 Parcel Boundaries

 Conversion Areas

 Seasonal Road

 Class II Watercourse

 Class III Watercourse

Conversion Site 7

Observation Point 7(a)

APN 107-233-013

APN 107-234-014



BLAIR
CONSULTING

Approximate Locations of APNs

Spotted Owl Observations [ds704]

- Nest
- Young
- Pair
- Other Positive Observation
- Negative Observation
- Activity Center
- Abandoned Activity Center
- Not Valid Activity Center

California Natural Diversity Database (CNDDDB) 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. (specific)
- Aquatic Comm. (non-specific)



Humboldt Gardens LLC CNDDDB

