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February 3, 2018

Nathan P. Harveston
P.O. Box 671
Willow Creek, Ca 95573

Dear Nathan:

Re: APN 522-211-051

The following is an evaluation of potential timberland conversion on proposed cannabis cultivation sites and associated areas included in the Humboldt County Cannabis Permit Application for Nathan P. Harveston within APN 522-211-051. 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 proposed cultivation sites and associated areas contained within the application on October 24, 2017 and November 11, 2017. The RPF prepared a Conversion Exemption for the previous landowner, John Lima, in July 2010. The RPF is familiar with the pre-existing condition of the property prior to development associated with the conversion and subsequent development occurring under the ownership of the Applicant, Nathan P. Harveston. The RPF exercised due diligence in reviewing all sites and all available resources to fully assess potential timberland conversion. This report evaluates the cultivation sites and associated areas for timber operations only. All other land alteration such a grading, construction, and other permit-regulated activities do not fall within the scope of this report. All property features and sites unrelated to cultivation activities also do not fall within the scope of this report. All findings are summarized in the report below.

Project Summary

The property is a 16-acre parcel located on Brannan Mountain Road in Willow Creek. The situs address is 710 Brannan Mountain Road, Willow Creek, Ca. Legal description is the NW ¼ of SW ¼ of Section 29, Township 7N, Range 5E, Humboldt Base & Meridian. The property has no residence but has three cultivation sites as described below. The greater property is densely forested with second growth Douglas-fir, black oak, pacific madrone and oak woodlands. Based upon increment borings of dominant Douglas-fir trees and review of historic aerial imagery, the parcel appears to have been harvested approximately 30-46 years ago between 1972 and 1988. Timber harvesting occurred in 2010 in association with Conversion Exemption 1-10EX-159 HUM. The current landowner, Nathan P. Harveston purchased the property in 2013.

Cultivation Site

Per TVCE's Plot Plan (April 2017) cannabis cultivation consists of a combination of outdoor and greenhouse cultivation totaling approximately 12,268 ft². In addition there is a proposed 4,300 ft² propagation area. Existing cultivation has historically occurred in three distinct areas; Site A, Site B, and Site C as described below. The property was initially developed in 2010 by the former landowner John Lima dba Redwood Forest Products per Conversion Exemption 1-10EX-159 HUM. The conversion exemption included 2,400 feet of new road construction beginning at Brannan Mountain Road and ending at the 1.3 acre conversion area. This 1.3 acre area currently coincides with Site B. The new road was constructed between 2010 and 2011, and also included the construction of a log landing as shown on the attached map. This log landing location was included in Conversion Exemption 1-10EX-159 HUM.

Site A

Site A is approximately 0.21 acres or 9,270 ft² in size. Site A appears to have been converted and developed between 2012 and 2014. Site A is located outside of Conversion Exemption 1-10EX-159 HUM. The cultivation activities observed at Site A impede the use of this space for current timber growth and harvesting, and the landowner has effectively converted the single use of this space from timber production to cannabis cultivation. Thus, Site A constitutes timberland conversion.

Site B

Site B is approximately 0.55 acres or 24,080 ft² in size. Site B appears to have been converted and developed between 2012 and 2014. Site B is located entirely within Conversion Exemption 1-10EX-159 HUM; however it appears to have been converted and developed after the expiration of the permit which was 8-2-2011. The cultivation activities observed at Site B impede the use of this space for current timber growth and harvesting, and the landowner has effectively converted the single use of this space from timber production to cannabis cultivation. Thus, Site B constitutes timberland conversion.

Site C

Site C is approximately 0.22 acres or 9,484 ft² in size. Site C was initially developed as a log landing between 2010 and 2011 as permitted by Conversion Exemption 1-10EX-159 HUM. The exact size of the developed landing used to facilitate the conversion exemption is unknown. However, the Forest Practice Rules require that proposed landings greater than ¼ acre in size must be identified as such on the map, which was not the case with this conversion exemption. The landing was expanded between 2012 and 2014 to its present size. The cultivation activities observed at Site C impede the use of this space for current timber growth and harvesting, and the landowner has effectively converted the single use of this space from timber production to cannabis cultivation. Thus, Site C constitutes timberland conversion.

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)."

Site A, B, and C are not located within a WLPZ or ELZ. Per the landowner's WRPP, there are no watercourses within property or nearby the cultivation sites

Slash and Woody Debris Treatment

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

Untreated slash is located below Site C as shown on the attached map and pictured that requires treatment.

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 (CNDDB) on February 3, 2018 showed no observations of sensitive, rare, threatened, or endangered species or species of special concern (including Northern spotted owls) within the property boundary. Sensitive species occur within the project area's 0.7-mile biological assessment area; however none are close enough to require consultation with USFWS and CDFW, or the development and implementation of protection measures per the Forest Practice Rules.

Cultural Resources

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

No archeological resources were observed during the preparation of Conversion Exemption 1-10EX-159 HUM, and none were observed during the October 24, 2017 and November 11, 2017 field visit. Per the landowner, an archeological survey was recently conducted for the project area and an

isolate was discovered on the property line with Forest Service to the north of Site B. However, an isolate in itself would not qualify as a "Significant Archaeological or Historical Site" per 14CCR 895.1 of the Forest Practice Rules and therefore timber operations would have been permitted. Timber operations occurring on conversion exemptions are permitted on "Significant Archaeological or Historical Site" per 14CCR 895.1 under certain conditions as described in 14CCR 14 CCR 1104.1(2)(I)(a)(b).

Recommendations

In summary, a total of approximately 0.98 acres of timberland conversion have occurred in association with cultivation activities occurring on the property. This acreage is below the three-acre conversion exemption maximum. The conversion activities conducted on the property do *not* comply with 14CCR 1104.1(a)(2)(O)(6) of the California Forest Practice Act and the California Forest Practice Rules. The RPF recommends the following measures for the converted areas:

1. Below Site C: Treat all slash and woody debris as soon as possible using one of the following methods: burying, chipping and spreading, piling and burning, or removal from site.

Sincerely,



Chris Carroll, RPF #2628
Timberland Resource Consultants

Pictures



Picture 1: Cultivation Site A. Photo date 10-24-2017.

Pictures



Picture 2: Top or western portion of Cultivation Site B. Photo date 10-24-2017.

Pictures



Picture 3: Bottom or eastern portion of Cultivation Site B. Photo date 10-24-2017.

Pictures



Picture 4: Cultivation Site C facing southwest. Photo date 10-24-2017.

Pictures



Picture 5: Cultivation Site C facing northeast. Photo date 10-24-2017.

Pictures



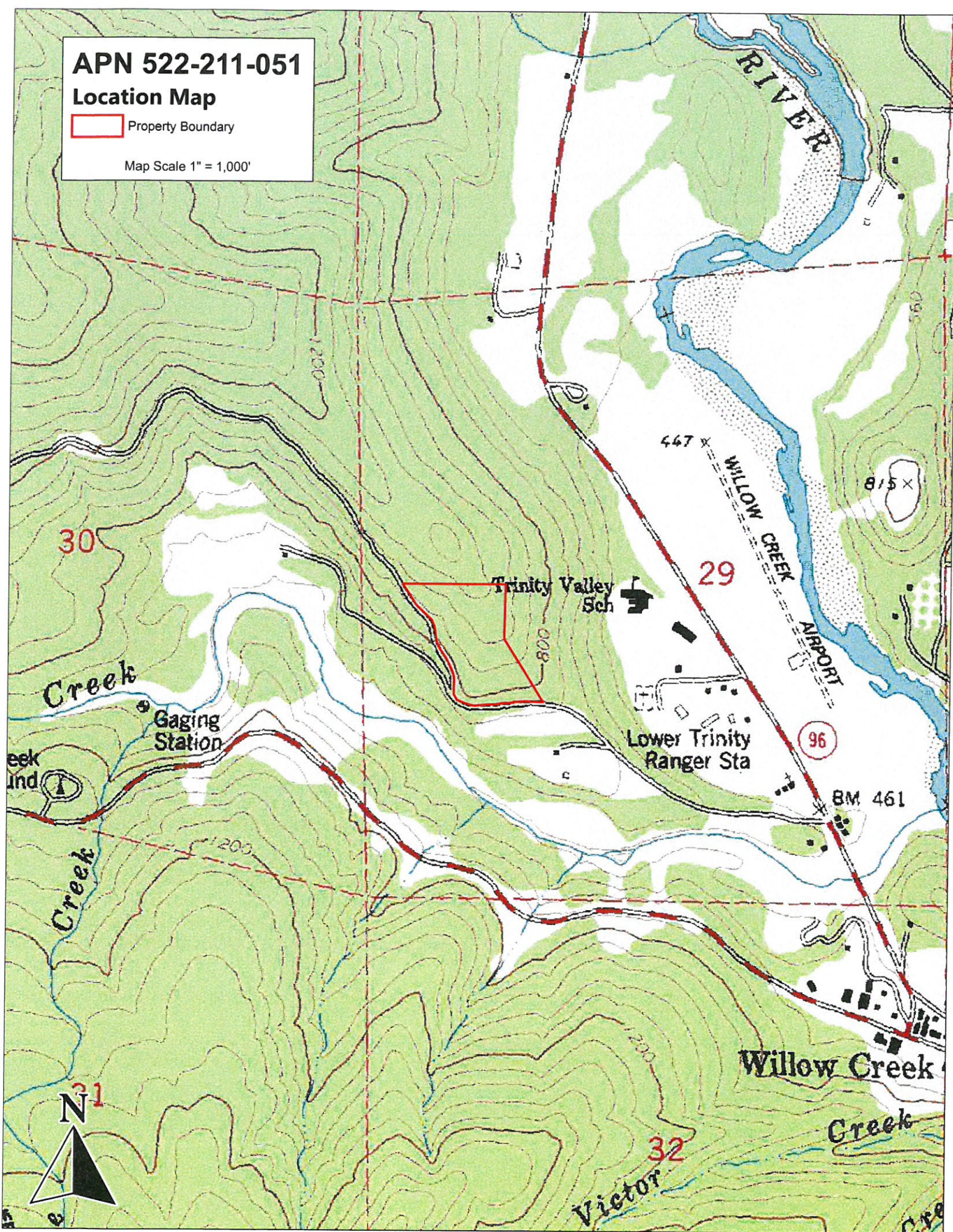
Picture 5: Untreated slash located below Cultivation Site C. Photo date 10-24-2017.

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Location Map







 Property Boundary

Map Scale 1" = 1,000'



APN 522-211-051

Conversion Evaluation Map

-  Property Boundary
-  Conversion Exemption
1-10EX-159 HUM
-  Pre-existing Cultivation Site
-  Permanent Rocked Road
-  Brannan Mtn Road
-  Landing Location
1-10EX-159 HUM

Map Scale 1" = 150'

