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April 13, 2019

Humboldt Leaf, Inc Attention: Josh Ptashne P.O. Box 519 Redway, CA 95542

> Re: APN 211-372-007 Application #12601

This letter is in response to Department Policy Statement No. 16-002, which states, "If a workable alternative cultivation site exists on a parcel and its relocation will bring the cultivation into compliance with performance standards of the CMMLUO, this approach could meet the objectives of the CMMLUO provided it is the environmentally superior option."

As a Third-Party representative to the Water Board and Registered Professional Forester managing your property for timber production, Timberland Resource Consultants recommends the relocation of pre-existing cannabis cultivation at Cultivation Site 2 and Cultivation Site 6 to Cultivation Site 5 as shown on the attached map. The relocation project also includes a proposal to convert approximately 0.27 acres of timberland located adjacent to Cultivation Site 5 to accommodate the combined pre-existing cultivation.

Cultivation Site 2 is located within a Class II and Class III watercourse buffer zone and contains potential wetlands. CS 2 has hydrophytic vegetation but no investigation has been made for the presence of hydric soil and wetland hydrology. A positive wetland determination is made when all three wetland parameters are present (hydrophytic vegetation, hydric soil, and wetland hydrology).

Cultivation Site 2 does not comply with State-wide Order WQ 2017-0023-DWQ, General Requirement and Prohibition Number 37, which states: "Cannabis cultivators shall comply with the minimum riparian setbacks for all land disturbance, cannabis cultivation activities, and facilities', which in this case is a minimum 100 feet for Class II watercourses and wetlands, and 50 feet for Class III watercourses.

Cultivation Site 6 is historic log landing last used in association with THP 1-01-406 HUM. 2005 Google and NAIP imagery clearly reveals a large slash pile, which is located on a log landing. This landing is located in the lower, northwestern corner of the THP's harvest unit and serviced the "peninsula" of timber located between the truck road and Class II watercourse to the north. As recommended in the *Conversion Evaluation for APN 211-372-007* dated December 9, 2018, this landing should not be converted to cannabis cultivation and kept available for future use as a log landing. Re-use of this existing landing is desirable given that there is an existing network of skid roads feeding this site. Re-use of existing landings and their associated skid roads minimizes the loss of growing space and thus potential loss of soil productivity.

Sincerely,



Chris Carroll, RPF #2628 Timberland Resource Consultants





