

**ECD HOLDINGS, INC**  
**APN: 511-141-015**  
**ROAD EVALUATION REPORT**  
**HUMBOLDT COUNTY, CA**

**Commercial Cannabis Cultivation Facilities**

Lead Agency:

*Humboldt County Planning Department*  
3015 H Street  
Eureka, CA 95501

Prepared By:



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In Consultation with:

**ECD Holdings, INC**  
2260 Hooven Rd.  
McKinleyville, CA 95519

February 2024



2-23-24

Table of Contents

**1. INTRODUCTION.....1**

**2. ROAD POINTS.....1**

**3. STANDARD 1 – DEAD END ROAD LENGTH.....4**

**4. STANDARD 2 – FUNCTIONAL CAPACITY.....4**

**5. STANDARD 3 – PRIVATE ROAD SYSTEMS – PROTECTION FOR WATER QUALITY AND BIOLOGICAL RESOURCES.....5**

**6. ROAD MAINTENANCE ASSOCIATIONS AND COST SHARING .....7**

**7. CONCLUSION .....7**

APPENDICES

APPENDIX A: HUMBOLDT COUNTY DEPARTMENT OF PUBLIC WORKS ROAD EVALUATION REPORTS

APPENDIX B: ROAD EVALUATION SITE MAP

APPENDIX C: ROAD EVALUATION PHOTOS

# ROAD EVALUTAION REPORT

ECD HOLDINGS, INC

## 1. INTRODUCTION

This Road Evaluation Report contains a detailed overview of the road system that is used to access the subject parcel, APN: 511-141-015 (Subject Parcel), and premises on which commercial cannabis activities are proposed to occur on. The assessment describes how the road system meets the Performance Standard set forth in Section 55.4.12.1.8 – Road Systems in Humboldt County Ordinance No. 2599, Commercial Cannabis Land Use Ordinance.

The road system leading to the Subject Parcel is comprised of Hooven Road (non-County maintained) and a Private Driveway. Hooven Road is a private, non-County maintained, gravel road.

Attachment B contains a Road Evaluation Map that depicts the route used to access the Subject Parcel. This report includes a separate section for each of the Performance Standards in section 55.4.12.81. Each section describes how the road system meets each Performance Standard.

## 2. ROAD POINTS

Road Points (RPs) were identified along the route leading to the Subject Parcel. RPs are defined as interest points along the subject roads; locations of pinch points, locations of sight distance restrictions, intersections, gates, turnouts, typical road sections, stream crossings or drainage features (inboard ditches, culverts, etc.). RPs can contain multiple features, such as a pinch point along with a stream crossing. The road widths were measured, photos were taken, and recommendations were prescribed at each RP. The recommendations are based on whether the RPs pose a site-specific constraints or pose a threat to water quality or biological resources.

Table 1 contains a description of the Road Points, Latitude and Longitude, and the measure road width of each RP. The table also describes the recommended prescription for each RP. See the attached Road Evaluation Map for more details of the location of each road segment. Attachment C contains photographs of each RP.

Table 1: Road Points.

<b>RP#</b>	<b>Figure(s)</b>	<b>Measured Roadway Width (ft.)</b>	<b>Lat., Long.</b>	<b>Description</b>	<b>Recommendation</b>
1	1 - 2	18	40.9707, -124.0958	Intersection of Dows Prairie Road and Hooven Road. No sight distance restrictions. 18'x50' asphalt apron.	Maintain existing roadway width and sight distance.
2	3 - 4	16	40.9707, -124.0929	Typical section of Hooven Road. No sight distance restrictions.	Maintain existing roadway width and sight distance.

ROAD EVALUTAION REPORT

ECD HOLDINGS, INC

3	5 - 8	16	40.9707, -124.0914	<p>Hooven Road transitions from 16' width to 13' width. Turnout located prior to roadway transition. Turnout provides a minimum of 20-foot width (including adjacent traffic lane), and 80 foot length (including 25 foot tapers on each end). No sight distance restrictions.</p>	Maintain existing roadway width and sight distance. Maintain existing turnout.
4	9 - 10	11	40.9706, -124.0898	<p>Pinch point. Residential vegetation limits roadway width for approximately 50 feet. No sight distance restrictions.</p>	Manage vegetation to increase roadway width, to maximum extent possible to achieve 18-foot travel way.
5	11 - 13	14	40.9706, -124.0890	<p>Bottom of approaching mild grade. 10% grade for approximately 200 feet in length. No sight distance restrictions.</p> <p>End of inboard ditch. Inboard ditch discharges to stable forested area.</p>	<p>Maintain existing roadway width and sight distance.</p> <p>Maintain inboard ditch.</p>
6	14 - 16	15	40.9713, -124.0880	<p>Typical section of Hooven Road. No sight distance restrictions.</p> <p>Top of approaching mild grade. 10% grade for approximately 100 feet in length.</p>	Maintain existing roadway width and sight distance.
7	17 - 18	16	40.9716, -124.0874	<p>Bottom of approaching mild grade. 10% grade for approximately 100 feet in length.</p> <p>Typical section of Hooven Road. No sight distance restrictions.</p>	Maintain existing roadway width and sight distance.

ROAD EVALUTAION REPORT

ECD HOLDINGS, INC

8	19 - 20	23	40.9717, -124.0868	Top of mild grade. Turnout present. 10% grade for approximately 100 feet in length. Turnout provides a minimum 20 foot width (including adjacent traffic lane), and 80 foot length (including 25 foot tapers on each end). No sight distance restrictions.	Maintain existing roadway width and sight distance.  Install packed gravel to stabilize existing turnout.
9	21 - 22	15	40.9714, -124.0865	Typical section of Hooven Road. No sight distance restrictions.	Maintain existing roadway width and sight distance.
10	23 - 24	11	40.9703, -124.0855	Pinch point. Reduced roadway width. No sight distance restrictions.	Increase roadway width, to maximum extent possible to achieve 18-foot travel way.
11	25 - 26	12	40.9693, -124.0843	Top of approaching mild grade. 15% grade for approximately 150 feet in length. No sight distance restrictions.	Increase roadway width, to maximum extent possible to achieve 18-foot travel way.
12	27 - 29	14	40.9685, -124.0840	End of Hooven Road.  Bottom of mild grade. 15% for approximately 150 feet. No sight distance restriction.  Gate leading to Subject Parcel. Gate measures 16 feet in width, with no vertical restrictions.	Maintain existing roadway width and sight distance.  Maintain minimum 14 feet horizontal clearance at gate.
13	30 - 31	11	40.9679, -124.0845	Typical section of Private Driveway. No sight distance restrictions.	Maintain existing driveway width and sight distance.
14	32 - 33	11	40.9680, -124.0856	Typical section of Private Driveway. No sight distance restrictions.  Large turnaround / turnout area adjacent to cannabis cultivation activities.	Maintain existing driveway width and sight distance.  Maintain large turnout area and keep clear for emergency vehicles,

*\*: All roadway improvements and maintenance along Hooven Road is to be coordinated and conducted by the Road Maintenance Association (To be formed in the future)*

### 3. STANDARD 1 – DEAD END ROAD LENGTH

*Project shall not be located more than 2-mile (driving distance) from the nearest intersection with a Category 4 road or secondary access for emergency vehicles and personnel, including wildland fire equipment.*

The Subject Parcel is located approximately 0.79 miles (4,145 feet) from Dows Prairie Road (State Road No.: 4M220, per Humboldt County WebGIS). Dows Prairie Road is a paved, two-lane road with a painted center-line stripe. Table 3 describes each road segment that is included in the road system that is used to access the Subject Parcel. See the attached Road Evaluation Map for more details of the location and alignment of the road segment that is used to access the Parcels.

Table 2: Road system leading to the Subject Parcel.

<b>Road Name</b>	<b>Length (mi.)</b>	<b>Start Road Point</b>	<b>End Road Point</b>
Hooven Road	0.79	RP 1	RP 12
Private Driveway	0.08	RP 12	RP 14

### 4. STANDARD 2 – FUNCTIONAL CAPACITY

*Roads providing access to the parcel must meet or exceed the Category 4 road standard (or same practical effect).*

Following the recommendations in this report, the road segment leading to the Subject Parcel (Hooven Road) meets the Category 4 road standard to the same practical effect. The road system is not paved but is equivalent to Category 4 road standard in all other aspects. All road segments are functionally equivalent to two-lane roads with designated speeds of 25 MPH (per Humboldt County WebGIS). There is no designated parking along the traveled roadway and turnouts are present along the entire road segment.

There are four sections of mild grades located along Hooven Road; two sections of  $\pm 10\%$  grade from RP 5 to RP 6, one section of  $\pm 10\%$  grade from RP 7 to RP 8, and one section of  $\pm 15\%$  grade from RP 11 to RP 12. All sections of mild grades are less than 300 feet in length, and provide adequate visibility. The locations of the mild grades are shown on the site map in Attachment B.

Leading from Dows Prairie Road, the entire road segment has the potential to serve eleven (11) residential parcels, including the subject parcel. The average daily traffic (ADT), associated with residential uses, for Hooven Road is estimated to be fifty-five (55), excluding activities by ECD Holdings, INC. This is calculated by multiplying the number of parcels served by the road system by 5 (per Humboldt County Code - Design Standards for Roadway Category).

Currently ECD Holdings, INC has a maximum of ten (10) employees onsite during peak operations, and has, on average one (1) delivery per day. The ADT associated with ECD Holdings, INC current operations, in peak operation season, is estimated to be twenty-two (22). The current total ADT for Hooven Road is estimated to be seventy-seven (77).

## ROAD EVALUTAION REPORT

### ECD HOLDINGS, INC

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ECD Holdings, INC is proposing to increase the maximum number of onsite employees to fourteen (14) employees onsite during peak operations; four (4) additional employees. The ADT associated with ECD Holdings, INC proposed operations, in peak operation season, is estimated to increase by eight (8). This accounts for one trip to the site, and one trip away from the site, for each employee.

The total ADT, including the proposed additional employees for ECD Holdings, INC is estimated to be eighty-five (85), far less than the 400 ADT that qualifies as a Very Low-Volume Local Road.

ECD Holdings, INC has developed a Traffic Reduction Plan which all employees are required to adhere to. The Traffic Reduction Plan includes polices such as encouraging carpooling, requiring on site breaks, reducing deliveries to the site (deliveries to ECD Holdings, INC off-site facility), and encouraging bike travel.

ECD Holdings, INC has also been involved with maintaining Hooven Road by applying gravel within the road prism, ensuring that inboard ditches and lead-out ditches are clear, and vegetation management.

Following the recommendations, the entire road system demonstrates adequate functional capacity to operate as a Very Low-Volume, Category 4 Road.

## 5. STANDARD 3 – PRIVATE ROAD SYSTEMS – PROTECTION FOR WATER QUALITY AND BIOLOGICAL RESOURCES

*Private road systems and driveways providing access to parcel shall be designed, maintained, or retrofitted in accordance with the “Five Counties Salmonid Conservation Roads Maintenance Manual.” This includes measures to protect water quality using best management practices so that:*

- *Impacts from point source and non-point source pollutants are prevented or minimized.*
- *Design and construction of culverts, steam crossings, and related drainage features shall remove barriers to passage and use by adult and juvenile fish, amphibians, reptiles and aquatic invertebrates.*

Road Points (RPs) that are associated with water quality and biological resources were located along the entire road system, and assessed for functionality, design and potential impacts to water quality and biological resources. These RPs include, but are not limited to stream crossings, drainage relief culverts, lead-out ditches, or any other physical feature that have a potential to impact water quality or biological resources.

The subject road systems are located within the Mad River Watershed (per Humboldt County WebGIS). The road system does not include any surface water crossings, but it does have inboard ditches and sever lead-out ditches. There is an inboard ditch that originates at RP 7, travels along the roadway and discharges onto stable, vegetative forest cover at RP 5. There are several lead-out ditches that have been constructed to break up sheet flow along Hooven Road. All inboard ditches and lead-out ditches are in good condition and do not currently have potential to impact water quality or biological resources.

Table 5 below describes all road points associated with water quality and biological resources. The table lists the location (Lat./Long.) of each RP, describes the relation to water quality/biological resources, describes any issues related to water quality due to functionality and describes any recommendations associated for each RP.

ROAD EVALUTAION REPORT

ECD HOLDINGS, INC

Table 3: Road Points associate with water quality and biological resources.

RP #	Figure(s)	Lat., Long.	Description	Recommendation *
5	13	40.9706, -124.0890	Discharge location of inboard ditch. Inboard ditch discharges onto stable, vegetative forest cover. Inboard ditch was conveying stormwater flows adequately at time of inspection.	Routinely inspect inboard ditch and discharge location for sediment build up and clogging of vegetation. Maintain inboard dich and discharge location by removing sediment build up and vegetation as needed.
6	16	40.9713, -124.0880	Inboard ditch along Hooven Road. The inboard ditch was conveying stormwater flows adequately at time of inspection.	Routinely inspect inboard for sediment build up and clogging of vegetation. Maintain inboard dich by removing sediment build up and vegetation as needed.
7	18	40.9716, -124.0874	Lead-out dich installed to break up sheet flow.	Routinely inspect lead-out ditch for sediment build up and clogging of vegetation. Maintain lead out dich by removing sediment build up and vegetation as needed.
12	29	40.9685, -124.0840	Lead-out dich installed to break up sheet flow.	Routinely inspect lead-out ditch for sediment build up and clogging of vegetation. Maintain lead-out dich by removing sediment build up and vegetation as needed.

***\*: All roadway improvements and maintenance along Hooven Road is to be coordinated and conducted by the Road Maintenance Association (To be formed in the future)***

Overall, the subject road system is designed and maintained in accordance with the “*Five Counties Salmonid Conservation Roads Maintenance Manual.*” All sections along the road system are adequately sloped to allow and convey surface water to runoff the road surface away from watercourses, minimizing surface riling and minimizing sediment mobilization. All inboard ditches and lead-out ditches have sufficient vegetation buffers to capture and settle any mobile sediment.

During the investigation, there were no observations of aquatic life, no observations of threats to biological resources or observations of potential threats to biological resources.

There were no signs of road failure, landslides, sediment plumes or any other indication of potential threats to water quality or biological resources.



## 6. ROAD MAINTENANCE ASSOCIATIONS AND COST SHARING

- 1) *Where three or more permit applications have been filed for Commercial Cannabis Activities on parcels served by the same shared private road system, the owner of each property must consent to join or establish the appropriate Road Maintenance Association (RMA) prior to operation or provisional permit approval. This requirement shall also apply to existing permittees seeking to renew their permit. Evidence shall be provided to the satisfaction of the County, and may include minutes from a meeting, written correspondence and confirmation from the RMA Secretary, or similar information.*

Currently, according to Humboldt County WebGIS, ECD Holdings, INC is the only applicant for commercial cannabis operations along Hooven Road. Although ECD Holdings, INC is the only applicant pursuing permits for commercial cannabis, ECD Holdings, INC is in the process of establishing a road maintenance association (RMA), to include residence that live off of Hooven Road. The RMA is intended to share costs associated with routine road maintenance. ECD Holdings, INC has also been participating in road maintenance along Hooven Road, which includes the installation of gravel on the roadway, pothole repair, vegetation management, and maintenance of inboard ditches.

## 7. CONCLUSION

Following recommendations in this report, the road system used to access the Subject Parcel, APN: 511-141-015, will meet all Performance Standard set forth in Section 55.4.12.1.8 – Road Systems in Humboldt County Ordinance No. 2599, Commercial Cannabis Land Use Ordinance.

All roadway improvements and maintenance along Hooven Road are to be coordinated and conducted by a Road Maintenance Association (RMA). ECD Holdings, INC is in the process of establishing a road maintenance association (RMA).

This Road Evaluation Report is solely a guiding document for information of the location, attributes and condition of all the road features (Road Points). All recommendations set forth in this report shall be reviewed by all involved parties/agencies, prior to any construction. Furthermore, prior to any construction activities, a pre-construction meeting shall be held between the applicant, contractors and any other members of the RMA.

**APPENDIX A: HUMBOLDT  
COUNTY DEPARTMENT OF  
PUBLIC WORKS ROAD  
EVALUATION REPORTS**

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HUMBOLDT COUNTY DEPARTMENT OF PUBLIC WORKS  
ROAD EVALUATION REPORT

**PART A:** *Part A may be completed by the applicant*

Applicant Name: ECD Holdings, LLC APN: 511-141-015

Planning & Building Department Case/File No.: PLN-2022-17880

Road Name: Hooven Road (complete a separate form for each road)

From Road (Cross street): Dows Prarie Road

To Road (Cross street): Private Driveway

Length of road segment: 0.79 miles Date Inspected: 2/22/2024

Road is maintained by:  County  Other Private  
(State, Forest Service, National Park, State Park, BLM, Private, Tribal, etc)

Check one of the following:

**Box 1**  The entire road segment is developed to Category 4 road standards (20 feet wide) or better. If checked, then the road is adequate for the proposed use without further review by the applicant.

**Box 2**  The entire road segment is developed to the equivalent of a road category 4 standard. If checked, then the road is adequate for the proposed use without further review by the applicant.

*An equivalent road category 4 standard is defined as a roadway that is generally 20 feet in width, but has pinch points which narrow the road. Pinch points include, but are not limited to, one-lane bridges, trees, large rock outcroppings, culverts, etc. Pinch points must provide visibility where a driver can see oncoming vehicles through the pinch point which allows the oncoming vehicle to stop and wait in a 20 foot wide section of the road for the other vehicle to pass.*

**Box 3**  The entire road segment is not developed to the equivalent of road category 4 or better. The road may or may not be able to accommodate the proposed use and further evaluation is necessary. Part B is to be completed by a Civil Engineer licensed by the State of California.

The statements in PART A are true and correct and have been made by me after personally inspecting and measuring the road. A map showing the location and limits of the road being evaluated in PART A is attached.

D. Roette  
Signature

2-23-24  
Date

Derek Roette  
Name Printed

**Important: Read the instructions before using this form. If you have questions, please call the Dept. of Public Works Land Use Division at 707.445.7205.**

**PART B: Only complete Part B if Box 3 is checked in Part A. Part B is to be completed by a Civil Engineer licensed by the State of California. Complete a separate form for each road.**

Road Name: Hooven Road Date Inspected: 2/22/2024 APN: 511-141-015  
From Road: Dows Prarie Road (Post Mile \_\_\_\_\_) Planning & Building  
To Road: Private Driveway (Post Mile \_\_\_\_\_) Department Case/File No.:  
PLN-2022-17880

1. What is the Average Daily Traffic (ADT) of the road (including other known cannabis projects)?

Number of other known cannabis projects included in ADT calculations:  
(Contact the Planning & Building Department for information on other nearby projects.) 0

ADT: 68 Date(s) measured: 2/22/2024

Method used to measure ADT:  Counters  Estimated using ITE *Trip Generation Book*

Is the ADT of the road less than 400?  Yes  No

If YES, then the road is considered very low volume and shall comply with the design standards outlined in the American Association of State Highway and Transportation Officials (AASHTO) *Guidelines for Geometric Design of Very Low-Volume Local Roads (ADT ≤400)*. Complete sections 2 and 3 below.

If NO, then the road shall be reviewed per the applicable policies for the design of local roads and streets presented in AASHTO *A Policy on Geometric Design of Highways and Streets*, commonly known as the "Green Book". Complete section 3 below.

2. Identify site specific safety problems with the road that include, but are not limited to: (Refer to Chapter 3 in AASHTO *Guidelines for Geometric Design of Very Low-Volume Local Roads (ADT ≤400)* for guidance.)

A. Pattern of curve related crashes.

Check one:  No.  Yes, see attached sheet for Post Mile (PM) locations.

B. Physical evidence of curve problems such as skid marks, scarred trees, or scarred utility poles

Check one:  No.  Yes, see attached sheet for PM locations.

C. Substantial edge rutting or encroachment.

Check one:  No.  Yes, see attached sheet for PM locations.

D. History of complaints from residents or law enforcement.

Check one:  No.  Yes ( check if written documentation is attached)

E. Measured or known speed substantially higher than the design speed of the road (20+ MPH higher)

Check one:  No.  Yes.

F. Need for turn-outs.

Check one:  No.  Yes, see attached sheet for PM locations.

3. Conclusions/Recommendations per AASHTO. Check one:

The roadway can accommodate the cumulative increased traffic from this project and all known cannabis projects identified above.

The roadway can accommodate the cumulative increased traffic from this project and all known cannabis projects identified above, if the recommendations on the attached report are done. ( check if a *Neighborhood Traffic Management Plan* is also required and is attached.)

The roadway cannot accommodate increased traffic from the proposed use. It is not possible to address increased traffic.

A map showing the location and limits of the road being evaluated in PART B is attached. The statements in PART B are true and correct and have been made by me after personally evaluating the road.



Signature of Civil Engineer

Date

2-23-24



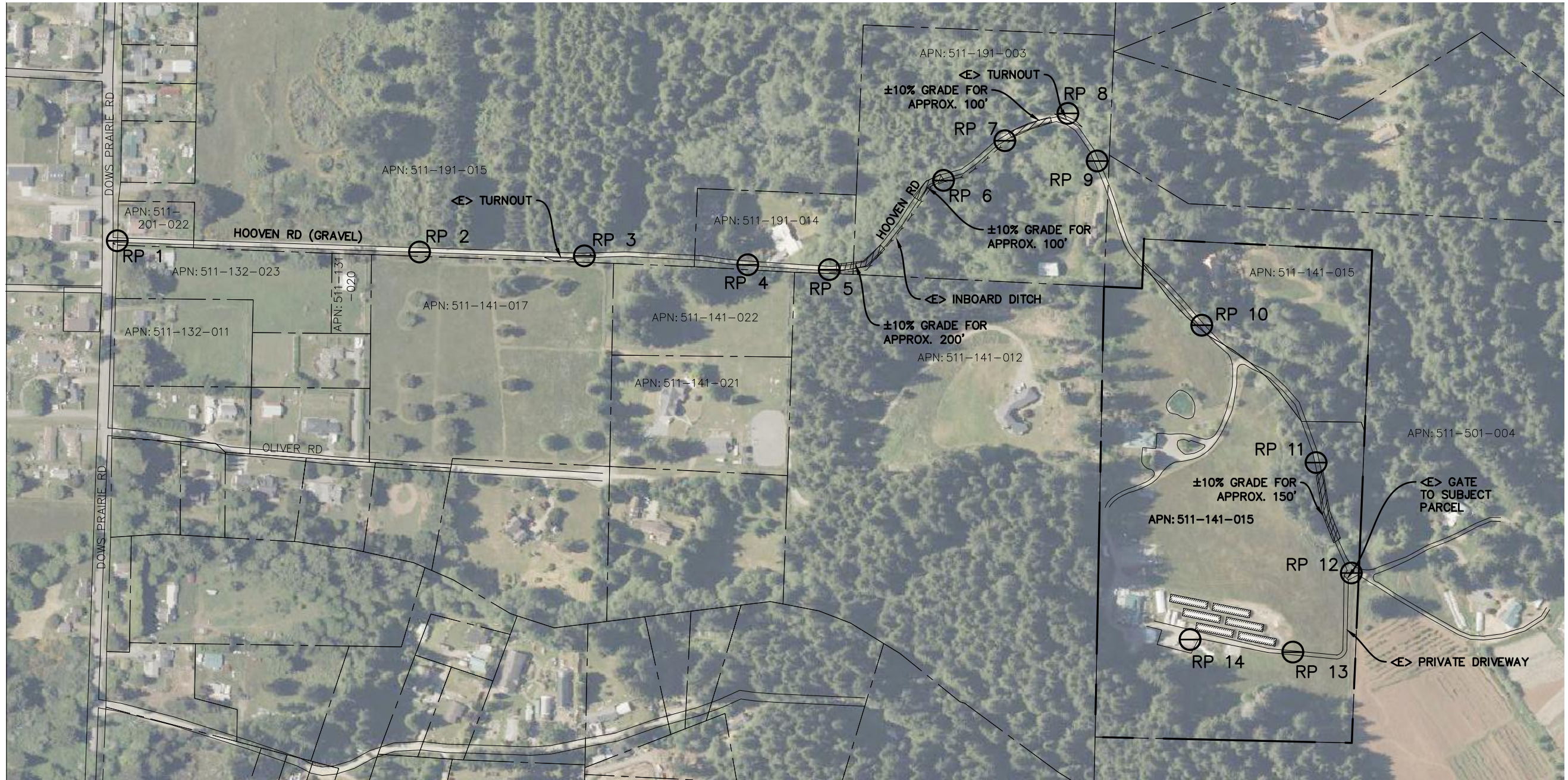
**Important: Read the instructions before using this form. If you have questions, please call the Dept. of Public Works Land Use Division at 707.445.7205.**

**APPENDIX B: ROAD  
EVALUATION SITE  
MAP**

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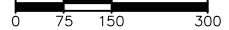
# ECD HOLDINGS, INC ROAD EVALUATION - SITE MAP

APN: 511-141-015



**PLOT PLAN**

22x34 SHEET: 1"=150'  
11x17 SHEET: 1"=300'



February 23, 2024 - 12:54 Dan Name: P:\Ech Holdings, Inc - Northern Emeralds - 20-060\CAD\TECH - ROAD EVAL.dwg Updated By: DanielBoale

DRAWN BY	
REVISIONS	
DATE	

**NORTHPOINT**  
 CONSULTING GROUP, INC.  
1117 Samoa Blvd., Arcata, CA 95521

**ECD HOLDINGS, INC**  
**APN: 511-141-015**  
**ROAD EVALUATION - SITE MAP**

PROJ MGR:	POW
DRAWN BY:	DDR
DATE:	2/23/24
SCALE:	AS SHOWN

SHEET  
**00**  
 20-060

##

**APPENDIX C: ROAD  
EVALUATION PHOTOS**

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# ROAD EVALUATION PHOTOS

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Figure 1: RP 1. Intersection of Hooven Road and Dows Prairie Road. Photo Taken facing east, vehicle traveling west.



## ROAD EVALUATION PHOTOS

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*Figure 2: Intersection of Hooven Road and Dows Prairie Road. Photo Taken facing west, vehicle traveling west.*

## ROAD EVALUATION PHOTOS

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*Figure 3: RP 2, typical section of Hooven Road. RP 2, typical section of Hooven Road. Photo Taken facing east, vehicle traveling west.*

## ROAD EVALUATION PHOTOS

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*Figure 4: RP 2, typical section of Hooven Road. RP 2, typical section of Hooven Road. Photo Taken facing west, vehicle traveling west.*

## ROAD EVALUATION PHOTOS

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*Figure 5: RP 3. Hooven Road transitions from an average width of 16 feet to an average width of 13 feet. Photo Taken facing east, vehicle traveling west, parked in turnout.*

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*Figure 6: RP 3. Hooven Road transitions from an average width of 16 feet to an average width of 13 feet. Photo Taken facing west, vehicle traveling west, parked in turnout.*

## ROAD EVALUATION PHOTOS

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*Figure 7: RP 3. Hooven Road transitions from an average width of 16 feet to an average width of 13 feet. Photo Taken facing east, vehicle traveling west.*

## ROAD EVALUATION PHOTOS

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*Figure 8: RP 3. Hooven Road transitions from an average width of 16 feet to an average width of 13 feet. Photo Taken facing west, vehicle traveling west.*

## ROAD EVALUATION PHOTOS

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*Figure 9: RP 4, pinch point. Vegetation restricts roadway width. Photo Taken facing east, vehicle traveling west.*



## ROAD EVALUATION PHOTOS

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*Figure 10: RP 4, pinch point. Vegetation restricts roadway width. Photo Taken facing west, vehicle traveling west.*

## ROAD EVALUATION PHOTOS

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*Figure 11: RP 5. Bottom of approaching mild grade. 10% grade for approximately 200 feet in length. Photo Taken facing east, vehicle traveling west.*

## ROAD EVALUATION PHOTOS

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*Figure 12: RP 5. Bottom of approaching mild grade. 10% grade for approximately 200 feet in length. Photo Taken facing west, vehicle traveling west.*

ROAD EVALUATION PHOTOS

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*Figure 13: RP 5. Discharge of inboard ditch.*

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*Figure 14: RP 6, typical section of Hooven Road. Photo Taken facing east, vehicle traveling west.*

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*Figure 15: RP 6, typical section of Hooven Road. Photo Taken facing west, vehicle traveling west.*

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*Figure 16: RP 6. Inboard ditch.*

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*Figure 17: RP 7, typical section of Hooven Road. Photo Taken facing east, vehicle traveling west.*



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*Figure 18: RP 7, typical section of Hooven Road, bottom of mild grade. Photo Taken facing west, vehicle traveling west.*

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*Figure 19: RP 8, turn out located at top of mild grade. Photo Taken facing east, vehicle traveling west, parked in turnout.*

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*Figure 20: RP 8, turn out located at top of mild grade. Photo Taken facing west, vehicle traveling west, parked in turnout.*

## ROAD EVALUATION PHOTOS

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*Figure 21: RP 9, typical section of Hooven Road. Photo Taken facing east, vehicle traveling west.*

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*Figure 22: RP 9, typical section of Hooven Road. Photo Taken facing west, vehicle traveling west.*

ROAD EVALUATION PHOTOS

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*Figure 23: RP 10, pinch point. Photo Taken facing south-east, vehicle traveling north-west.*

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*Figure 24: RP 10, pinch point. Photo Taken facing north-west, vehicle traveling north-west.*

## ROAD EVALUATION PHOTOS

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*Figure 25: RP 11. Top of approaching mild grade. Photo Taken facing south-east, vehicle traveling north-west.*



## ROAD EVALUATION PHOTOS

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*Figure 26: RP 11. Top of approaching mild grade. Photo Taken facing north-west, vehicle traveling north-west.*

## ROAD EVALUATION PHOTOS

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*Figure 27: RP 12. End of Hooven Road. Entrance gate to Subject Parcel in background. Photo Taken facing south-east, vehicle traveling north-west.*

## ROAD EVALUATION PHOTOS

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*Figure 28: RP 12. End of Hooven Road. Photo Taken facing north-west, vehicle traveling north-west.*

## ROAD EVALUATION PHOTOS

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*Figure 29: RP 12. Lead-out ditch.*

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*Figure 30: RP 13, typical section of Private Driveway. Photo taken facing west, vehicle traveling east.*

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*Figure 31: RP 13, typical section of Private Driveway. Photo taken facing east, vehicle traveling east.*

## ROAD EVALUATION PHOTOS

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*Figure 32: RP 14, typical section of Private Driveway. Adjacent to large turn around/turnout area. Photo taken facing west, vehicle traveling east.*

## ROAD EVALUATION PHOTOS

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*Figure 33: RP 14, typical section of Private Driveway. Adjacent to large turn around/turnout area. Photo taken facing east, vehicle traveling east.*