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August 18, 2022

Joel Geck-Moeller
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RE: PLN-2022-17700
APN 308-231-002

The following Timberland Assessment was prepared in response to CAL FIRE's May 11, 2022 referral comment as follows:

	Date:	Name:
Forester Comments:	5/11/22	McNicholas

The project involves "Timberlands" (CA PRC 4526) and the project referral does not specify that trees are not to be removed. A CAL FIRE timber harvest document (CA PRC 4621) (i.e. Less Than 3-Acre Conversions Exemption (14 CCR 1104.1)) may be required to complete the project.

The RPF inspected the proposed development area on August 17, 2022 as shown on the County's Tentative Map dated April 1, 2022, to determine if the subject property meets the definition of Timberland per PRC § 4526 as defined below:

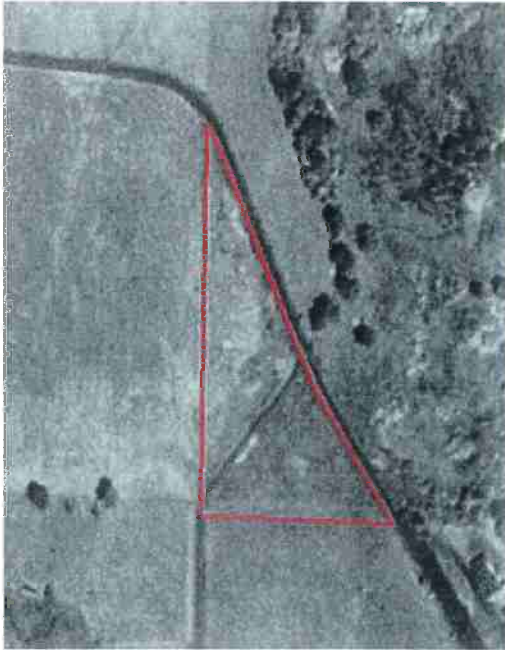
Z'BERG-NEJEDLY FOREST PRACTICE ACT

4526. Timberland. "Timberland" means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.

Per the RPF's field inspection, and review of the *Botanical Assessment for APN 308-231-002 Geck-Moeller (July 2022)*, the property is dominated by non-native grassland, which is presently being encroached by a shrub layer (Coastal Scrubland) consisting of Coyote Bush (*Baccharis pilularis*), Cascara Buckthorn (*Rhamnus purshiana*) and blackberry thickets composed of California blackberry (*Rubus ursinus*) and Himalayan blackberry (*Rubus armeniacus*). No Commercial Species (Group A or Group B) were observed within the project area per 14CCR 895.1 of the Forest Practice Rules.

Non-native Grasslands

Review of historic aerial imagery (NAIP, Google, Historicaerials.com) from 1940-1998 reveals that the subject property has historically been grazed by livestock or hayed. In addition, orchids were grown in the early 1980's as seen in 1983 imagery. Past agricultural use of the property controlled the encroachment of woody plants, shrubs, and small trees. However, land use within the past several decades has been less intensive with a significant decrease in grazing/haying relative to the past, which has resulted in the establishment/encroachment of woody plants and vegetation as seen in the imagery below.



1998



2005

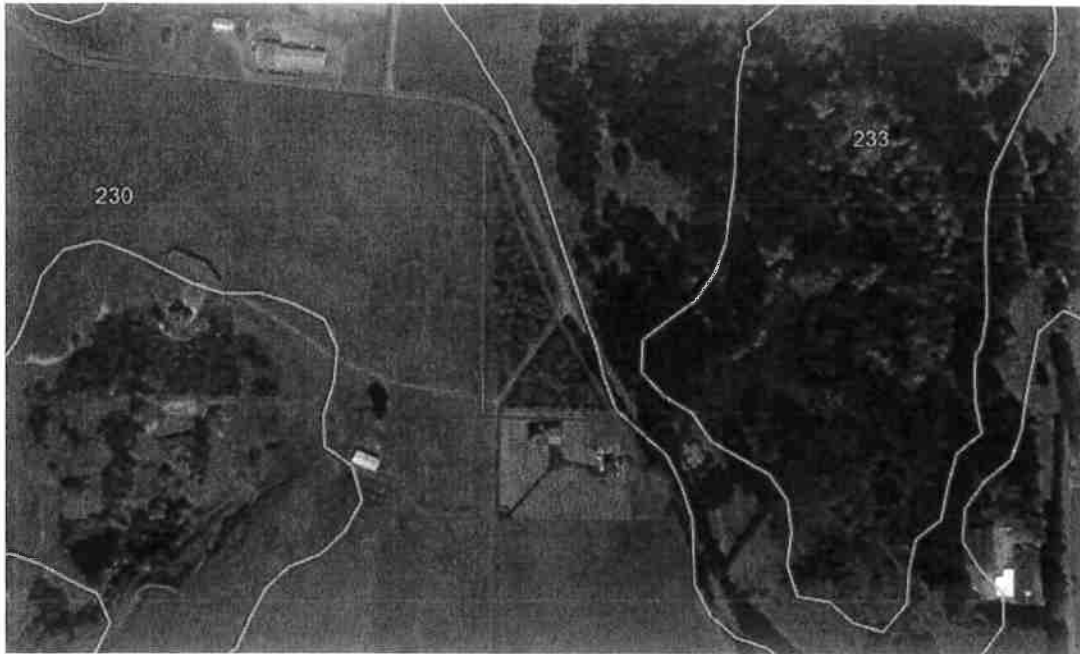


2014



2020

Soils



Per the USDA Natural Resources Conservation Service's Soil Survey (<https://casoilresource.lawr.ucdavis.edu>), the soils underlying the project site are 230: *Hookton-Tablebluff complex, 2 to 9 percent slopes*. The Hookton soil series are used mainly for pasture and the Tablebluff soil series used mainly for pasture and hay.

CAL FIRE Timber Harvesting Regulations

The California Department of Forestry and Fire Protection (CAL FIRE) enforces the laws that regulate logging on privately-owned lands in California. Compliance with the Forest Practice Act and Board rules apply to all commercial harvesting operations and to timberland conversion.

The removal of woody plants and small trees (Cascara Buckthorn) in association with the proposed development will not require a permit from CAL FIRE. This is based upon the fact that no conversion of timberland will occur (see discussion below), and the removal of woody plants and Cascara Buckthorn are not for commercial purposes. A permit from CAL FIRE is only required when "timber operations" occur as defined below.

4527. Timber operations; commercial purposes; criteria.

(a) (1) "Timber operations" means the cutting or removal, or both, of timber or other solid wood forest products, including Christmas trees, from timberlands for commercial purposes, together with all the incidental work, including, but not limited to, construction and maintenance of roads, fuel breaks, firebreaks, stream crossings, landings, skid trails, and beds for the falling of trees, fire hazard abatement, and site preparation that involves disturbance of soil or burning of vegetation following timber harvesting activities, but excluding preparatory work such as tree marking, surveying, or road flagging.

(2) "Commercial purposes" includes (A) the cutting or removal of trees that are processed into logs, lumber, or other wood products and offered for sale, barter, exchange, or trade, or (B) the cutting or removal of trees or other forest products during the conversion of timberlands to land uses other than the growing of timber that are subject to the provisions of Section 4621, including, but not limited to, residential or commercial developments, production of other agricultural crops, recreational developments, ski developments, water development projects, and transportation projects.

Timberland Conversion

The project area contains non-native grasslands historically used for grazing/haying that are now succumbing to Coastal Scrubland encroachment. The only tree species being removed to facilitate development is Cascara Buckhorn, which is not a Commercial Species per 14CCR 895.1 of the Forest Practice Rules. The project area is not Timberland per PRC § 4526 and therefore a CAL FIRE permit is not required.

Sincerely,



Chris Carroll, RPF #2628
Timberland Resource Consultants