



P.O. Box 733, Hydesville, CA 95547 . (707) 768-3743 . (707) 768-3747 fax

March 22, 2024

Rodney Yandell  
Humboldt County Planning Dept  
3015 H Street  
Eureka, CA 95501

Dear Mr. Yandell,

This letter concerns the use of the 10% Dead, Dying, and Diseased Exemption Form RM-73 (1038(b)) by SN Indianola LLC at its Indianola property (APN 402-032-002). The intent of Exemption Form RM-73 (1038(b)) is for the removal of dead, dying and diseased trees. This is a common practice completed by timberland owners on the north coast. The form itself identifies extensive limitations, conditions, and prohibitions designed to ensure that activities undertaken pursuant to the exemption are legitimate and follow the California Forest Practice Rules. As should be clear, this exemption does not allow conversion of a parcel to some other purpose.

As per my letter dated November 20, 2023, with respect to recent removal of dead, dying and diseased trees at the Indianola property, the exemption was properly prepared by the landowner in consultation with a licensed forester and submitted to Calfire. Calfire reviewed the document, and notified the public, state, and county agencies through the California Timber Regulation and Environmental Evaluation System (CalTREES) online Forest Practice permitting system, as is standard practice. State law does not require any additional notice for this type of exemption. The waiting period of 10 days for agency action was followed and no comments were received. The operations then commenced. The logs were removed by the licensed timber operator (LTO). The limbs and debris were chipped to reduce fire danger on site by the LTO. Calfire completed a site visit during operations, on October 31, 2023, and found the tree removal in conformance. Redwood stocking (approximately 1,400 redwood seedlings) was then planted across the area of operation per forest practice standards. The planted stocking covers the harvest area and is contiguous to a previously planted redwood stand on the property.

Please contact me if you have any further Questions.

Thank You

Stephen Hohman, RPF 2652  
Hohman and Associates Forestry Consultants, Inc.



CC: John Ford, Director of Planning and Building



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November 20, 2023

Trevor Estlow  
Planning & Building Dept.  
3015 H Street  
Eureka CA95501



Dear Trevor,

It has been brought to my attention that a coastal development permit was needed by SN Indianola LLC to remove Dead and Dying trees on the property. I have reviewed the approved CALFIRE permit 1-23EX-00780-HUM by SN Indianola LLC. It was reviewed and signed by the CALFIRE Forest Practice Manager Eric Hedge on September 21, 2023. The landowner followed the correct action and filed the 10% Exemption correctly with the proper agency. This is a landowner driven letter with the instructions placed on the exemption itself. The exemption form notes a 10 day window for the Coastal Special Treatment Area. As per the "limitations or requirements - Item 1" noted within the approved permit, that before commencement of timber operations, the Director shall have up to 10 calendar days from the date of the receipt to accept or reject the notice of timber operations within the Coastal Special Treatment Area. This statement within the permit follows from the following rule;

*921.2 Exemptions from Timber Harvesting Plan Requirements [Coast, Special Treatment Area]  
To ensure that the protection necessary to maintain the integrity of Coastal Commission Special Treatment*

*Areas is achieved, the following requirements shall apply to the Timber Operations exempt from filing of THPs under 14 CCR 1038.*

*(a) The requirements of 14 CCR 921.1(a) and (b) shall apply with the exception that, at the discretion of the Director, an initial inspection may not be required. Harvesting of Christmas trees are exempt from timber marking requirements.*

*(b) The Director shall acknowledge in writing, and within 10 days, acceptance or rejection of the notice of Timber Operations. Timber Operations shall not commence until the Director's acceptance has been received by the person who filed the notice.*

*(c) The requirements of PRC 4585, Completion Report, and PRC 4587, Stocking Reports, shall apply to exempt operations within the Coastal Commission Special Treatment Areas*

CALFIRE followed 921.1 and has alerted all agencies including the Coastal Commission and Humboldt County with the adoption of CALTREES, a statewide database. All permits within the coastal zone are displayed with a banner for action or inaction. The agencies have the right to contact CALFIRE and provide assistance in determining if the project is accepted or rejected. Since there was no Coastal Commission nor Humboldt County request to delay or reject the permit, it is my belief that the Coastal Commission has been given notice and provided inaction through the normal channels.

Sincerely

Stephen Hohman, RPF 2652  
Hohman and Associates Forestry Consulting, Inc.

