

From: [Mitchell, Catherine@Coastal](mailto:Mitchell.Catherine@Coastal)
To: [Wiles, Derek](mailto:Wiles.Derek)
Subject: Re: #19041 new referral for home protection, 017-192-006-000
Date: Wednesday, August 21, 2024 5:34:58 PM

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Ok, thanks. It's tough to read the ESHA policies in relation to these second and third-growth, previously logged forested areas, especially when they surround residential development. Development in ESHA is limited to resource-dependent uses, so an argument could be that removing some of the trees in overcrowded areas will open up the forest and enhance the health of remaining forest trees and understory. It sounds like that is what CDFW believes will happen as well as the applicant's forester. It would be good if the staff report could mention that as well as the fact that some trees will be trimmed and left in place, and the other mitigation measures that he mentioned. Since this project isn't appealable, we're just offering comments for consideration and as something to think about for future projects in redwood (and spruce) forest ESHA. Thanks for following up with the applicant and responding to our questions and comments.

Cat

From: Wiles, Derek <dwiles@co.humboldt.ca.us>
Sent: Wednesday, August 21, 2024 4:00 PM
To: Mitchell, Catherine@Coastal <catherine.mitchell@coastal.ca.gov>
Subject: RE: #19041 new referral for home protection, 017-192-006-000

Hi Cat,

I spoke with the applicant. Regarding trees 71-89, they stated, " Trees 71-83 are all around the edge of our lawn. As you can see from how they are grouped, almost all are crowded stump or root sprouts from relatively recent logging (est. 30 to 50 years) and are 110' to 130' tall. This means they are just reaching the height where if they fell they could hit the house. There are twice as many that are 10' to 30' behind them that we are leaving in place. From a forestry standpoint, we should be thinning those, as they, too, are thickly growing stump sprouts.

If you look at county GIS (the Eureka images are higher resolution), you can see that trees 84 to 89 have branches that hang over the house and parking area. Most are also leaning toward the house and a few have unstable bases. We were not planning to remove those until talking to licensed foresters, who pointed out the risks to the house. We are leaving in but limbing up the largest of them to reduce the weight on the heavy side."

Regarding mitigation, they said, "We will plant many more shrubs around the property and hope to include many native species. We have a well-thumbed copy of the Humboldt County weed list and will not plant anything on it. Since we bought the property in April, we have devoted 5-15 hours per week removing ivy, holly, and cotoneaster. We will never be able to stop removing those species, as there are ample seed sources on all the properties nearby. We have hopes of reducing the volume of

invasive plants and adding to the number of native ones. Clearing ivy off the snags and stumps and off the bases of the tall trees has been one of the pleasures of working on the property.”

Lastly, regarding minimizing the number of trees removes and mitigation and/ or landscaping restrictions, “We have a healthy population of evergreen and red huckleberrys, wax myrtle, and salal around the upper lawn (trees 50-80) that will be enhanced by the removal of the trees that are starting to shade them out. There are some hemlocks, a Western Red Cedar and a Port Orford Cedar that we are leaving in place. This will help those plants. We plan to transplant the thimbleberries coming up in the garden beds to the edge of the forest. We have plans to add native corylus cornuta.”

Please let me know how you would like to proceed or if further information is needed.

Thank you,

Derek

From: Mitchell, Catherine@Coastal <catherine.mitchell@coastal.ca.gov>

Sent: Monday, August 19, 2024 6:05 PM

To: Wiles, Derek <dwiles@co.humboldt.ca.us>

Subject: Re: #19041 new referral for home protection, 017-192-006-000

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Thanks Derek, that's good to know. Their biological assessment did not state whether the redwood trees are part of a sensitive natural community. It is likely that they are, since most of the parcel appears to consist of redwood forest. The Commission considers certain sensitive natural communities to be ESHA, including redwood forests. When we have approved tree thinning and removal for structural safety in the past, it has been limited to the minimum number of trees possible. We often request a report from a certified arborist documenting that the trees are dead or dying or otherwise at risk of falling onto the structure. The County doesn't necessarily need to request that in this case for all 60+ (the plans show 89) trees to be removed, but we have the following general recommendations related to tree removal occurring in ESHA:

Clearing for Wind Safety: We recommend directing the applicant to prioritize dead or dying trees or trees that are at risk of falling according to a professional forester. We encourage applicants to limb trees instead of fully removing them whenever possible.

Clearing for Fire Safety: We usually ask applicants to work with CalFire on an appropriate fuel modification plan for the property. We understand that it can be important to clear the 30-foot area surrounding structures but there appears to be more flexibility beyond the 30-foot mark. We often encourage applicants to balance tree removal with alternative fire-safety measures, including using fire resistant materials for roofing and siding, and removing non-

native trees and vegetation while limbing up the sensitive species.

Clarifications on Site Plan and Alternatives: It would be helpful to have more detail on the site plan including the approximate distance between the house and the trees proposed for removal. It seems like many of the trees in the 71-89 range could stay. Do you know why those trees are marked for removal? Same with trees along the southern line.

Mitigation: We recommend asking the applicant for a mitigation plan which addresses the impacted ESHA (redwood forest) and proposes to mitigate for the loss of x-acres of redwood forest by planting redwoods throughout the property in more appropriate areas. At the very least, the project could be conditioned to require replanting the cleared areas with appropriate, native shrubs and bushes and could prohibit using any invasive/problematic species for landscaping. We support doing the work outside of nesting bird season and any other measures that could protect the adjacent forested areas to remain, such as not having heavy equipment in the forest and leaving some cut trees as snags for wildlife habitat. Another option could be to remove invasive species like Ivy (if applicable) in the intact forest.

I'm happy to talk about the redwood ESHA issue more generally as well - we recently went through a takings analysis for a new house in spruce forest, because spruce forest is similarly classified as a sensitive natural community and therefore ESHA under the Coastal Act and LCP. In this case, we're mostly just recommending that the number of trees to be removed be minimized and that the County considers mitigation and/or landscaping restrictions in order to enhance the remaining forested areas.

Lastly, unless this project is within 100 ft of a wetland or requires a Use Permit, I don't believe it is appealable to our office. Let me know if you think otherwise.

Thanks,
Cat

From: Wiles, Derek <dwiles@co.humboldt.ca.us>
Sent: Thursday, August 15, 2024 2:55 PM
To: Mitchell, Catherine@Coastal <catherine.mitchell@coastal.ca.gov>
Subject: RE: #19041 new referral for home protection, 017-192-006-000

Please see the attachment from CDFW regarding the project.

From: Wiles, Derek
Sent: Thursday, August 15, 2024 2:52 PM
To: Mitchell, Catherine@Coastal <catherine.mitchell@coastal.ca.gov>
Subject: RE: #19041 new referral for home protection, 017-192-006-000

Hi Cat,

I did and Katie visited the site. Katie recommended that tree removal occur outside of nesting season, March 15- August 15. There is an emergency CDP but they have not removed any trees yet. The applicant stated the tree removal is required for structure protection for the existing residence and a pump house for Humboldt Community Services District (HCSD), as well as to provide suitable area for a septic repair. Please let me know if I can be of further assistance.

Thanks,
Derek

From: Mitchell, Catherine@Coastal <catherine.mitchell@coastal.ca.gov>
Sent: Thursday, August 15, 2024 12:54 PM
To: Wiles, Derek <dwiles@co.humboldt.ca.us>
Subject: Re: #19041 new referral for home protection, 017-192-006-000

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Hi Derek,

Thanks for the quick response. Have you consulted with CDFW? I believe they would consider the redwood forest ESHA as well and might have comments on this project. Is there also an emergency permit that was issued for the property? I saw one on CDMS. Were trees already removed?

Also, has the applicant elaborated on the need for tree removal? Especially if there is an emergency permit application. What is the need for rapid removal?

Thanks again,
Cat

From: Wiles, Derek <dwiles@co.humboldt.ca.us>
Sent: Thursday, August 15, 2024 9:18 AM
To: Mitchell, Catherine@Coastal <catherine.mitchell@coastal.ca.gov>
Cc: PlanningBuilding <planningbuilding@co.humboldt.ca.us>
Subject: RE: #19041 new referral for home protection, 017-192-006-000

Hi Catherine,

I don't think we've met yet; thank you for reaching out to me. Attached is the biological assessment. I will begin reviewing the initial comments later today and reach out to you if needed. Please let me know if you have questions or need additional information.

Thanks again,
Derek

From: Mitchell, Catherine@Coastal <catherine.mitchell@coastal.ca.gov>
Sent: Thursday, August 15, 2024 9:03 AM
To: Wiles, Derek <dwiles@co.humboldt.ca.us>
Cc: PlanningBuilding <planningbuilding@co.humboldt.ca.us>
Subject: Fw: #19041 new referral for home protection, 017-192-006-000

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hi Derek,

Not sure if we've met yet. I work on projects and review post-certs in Humboldt. I didn't have your email in my contacts but hopefully I guessed correctly based on the County planner email format?

We received the attached referral for the removal of redwood trees on a residential property. Has the applicant completed a biological assessment for the project yet? We recommend one, and would like to review the biological assessment in order to understand whether the vegetation is classified as a redwood forest sensitive natural community. If so, then the redwoods may be considered ESHA, and we would have additional comments and questions on the project.

Thank you, and let me know if you'd like to discuss our initial comments further.

-Cat

Catherine Mitchell

Coastal Planner | California Coastal Commission

1385 8th Street, Suite 130

Arcata CA 95521

(707) 826-8950 ext. 3

From: PlanningBuilding <planningbuilding@co.humboldt.ca.us>

Sent: Monday, July 29, 2024 12:45 PM

Subject: #19041 new referral for home protection, 017-192-006-000

Attached is a referral for a project within your jurisdiction. Please contact us with any questions and or concerns.

Thank you,

Tana Reynolds

Permit Technician

3015 H Street, Eureka, CA 95501

Planning and Building Department

planningbuilding@co.humboldt.ca.us

Phone: 707-445-7245

Fax: 707-445-7446

*Effective July 1, 2024, the Humboldt County Planning and Building Department will reduce the in-person counter service hours. The **new hours of operation will be from 8:30 a.m. to 2:00 p.m., Monday through Thursday, with the department closed on Fridays.***

