

Wednesday, June 30, 2021

Humboldt County Planning Commission

Re: Record Number: CDP-17-062/SP-17-156 (Application No. 13908), scheduled for public hearing on July 1, 2021

Assessor's Parcel Number: 515-271-024 – proposed major vegetation removal

Dear Planning Staff and Commissioners: I am writing to express concern about the above referenced project.

From the staff report: "The project involves proposed removal of 150 healthy trees within the 100-foot Riparian Corridor buffer as defined in the "R" combing zone Streams and Riparian Corridor Protection (section 313-33.1), and an additional 29 trees outside of the ESHA buffer for a total of 179 trees to be removed. In addition, Wetland Buffer Areas (section 313-125) require a 100-foot setback depending on size and sensitivity of the wetland. According to the Supplemental Tree Letter from Western Timber Services, Inc. dated June 19, 2021, no mature trees will be removed." However that statement is contradicted: a tree of 50" DBH is proposed for removal and that is mature – possibly even old growth.

The report further states: "The Structure Protection Exemption administered by Cal Fire under PRC 4290 and 4291, allows landowners to cut and remove healthy, merchantable tree species within 0-150 of a legally permitted structure and within 150-300 feet of a legally permitted habitable structure **subject to specific limitations** (emphasis added). The resulting enhanced fire protection is due to elimination of the vertical continuity of vegetative fuels and the horizontal continuity of tree crowns to reduce fire spread, duration and intensity. Of the trees proposed for removal, 118 are redwood trees, 24 are Sitka spruce, three (3) are Douglas fir, and the remaining five (5) trees are non-native eucalyptus. The average diameter of all trees is 18 inches." The project proposes: "Major Vegetation Removal of 150 trees with a diameter at breast height ranging from four (4) to fifty (50) inches at four and one-half (4.5) feet trunk height, within the 100-foot protective buffer for Streams and Riparian Corridor and Wetlands. An Additional 29 trees outside of the Streams and Riparian Corridor are proposed for removal."

The report does not state the specific size of the trees, it just says the average is 18" DBH and that 179 trees are proposed for removal, with some trees up to 50" DBH. Of the 179 trees, 150 trees are within the riparian corridor. The report states the tree removal is intended to address tree crown and understory fire hazard, branch wind-throw, and provide defensible space within the 150 feet to 300 feet of a legally permitted or (habitable) structure.

I have a number of concerns about this project. On the foggy coast north of Trinidad forest fires are rare and the ones that have occurred happened because of the post-timber-harvest-slash burning that was conducted and got out of control (the last major fire was in the 1940s). The fire hazard is overstated and does not require 150 feet of setback to create a safe, defensible space. CalFire recommends 30 feet around houses. I am OK with extending that beyond the 30 foot buffer as long as the project does not remove trees within the riparian corridor or mature trees with old growth characteristics. Trees such as the ones proposed for removal are important to combat climate change and in this specific area they are a source of "fog drip" precipitation that creates light rain on foggy days, moistening the soil and vegetation and making it extremely unlikely that a fire could take hold on this soggy vegetation. Removing the trees removes the forest that causes the fog drip. It also encourages brushy species, such

as scotch broom, coyote brush, and ceanothus to occupy the cleared space – species that are much more flammable than the redwoods they will replace. To justify this tree removal as creating defensible space around a residence is very weak and does not pass scientific analysis and scrutiny. Removal of 179 trees will also have a significant impact on local wildlife – specifically birds nesting in those trees. I did not see an adequate assessment of the loss of those trees on avian species.

I recommend modification of the permit to deny removal of any of the 150 trees within the riparian corridor. I also recommend a condition that no tree removal be conducted during bird nesting season (Feb. 1 through Aug. 15). I applaud the plan to plant native vegetation but I do not see any reason to remove redwood trees more than 30 feet from the house(s) unless they are leaning towards the house(s). Vegetation maintenance to ensure the cleared areas do not re-vegetate in volatile-brushy vegetation should be a required condition of approval.

Thank you for considering my comments.

Don Allan

Westhaven