



Redway Redwood Tree

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To Johnson, Cliff <CJohnson@co.humboldt.ca.us>

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Cliff,

CDFW received the County's referral for a Special Permit that would authorize the removal of a redwood tree (*Sequoia sempervirens*) greater than 12 inches in diameter at breast height (DBH) pursuant to Humboldt County Ordinance No. 2112 (PLN-2026-19554; APN 077-072-007). The tree is approximately 118 inches in DBH and 252 feet tall; it is estimated to be between 350 and 370 years old. It has been determined to be a hazard tree based on the report of a Registered Professional Forester (RPF) and an ISA Certified Arborist. Although not under consideration as part of this Special Permit, four other large redwoods on the property were recently removed under the authority of CalFire through a Structure Protection Exemption.

Old growth redwood trees play an irreplaceable role in the surrounding ecosystem through carbon storage, nutrient cycling, microclimate regulation, and stream geomorphology, among other watershed functions. They also provide invaluable habitat throughout their life and beyond, supporting unique communities that exist only in redwood forest. In addition to amphibians, small mammals, and invertebrates, their complex crown structure provides nesting habitat for a variety of migratory and resident birds, including marbled murrelet (*Brachyramphus marmoratus*), an endangered species pursuant to the California Endangered Species Act. The subject parcel is in an area identified as potentially suitable habitat for marbled murrelet (see BIOS layer ds443) and within less than a quarter of a mile from federally designated Critical Habitat (ds157) in John B. Dewitt Redwoods State Natural Reserve.

As a Trustee Agency, CDFW typically provides recommendations to avoid and minimize project impacts to public trust resources; however, it is difficult to determine measures for the removal of an old growth redwood that has provided ecological benefits for hundreds of years and would have conceivably continued these benefits well into the future. CDFW recognizes the importance of public safety and will not weigh in on the determination of risk. Some of the structural deficiencies cited in the hazard tree assessment are associated with preparation for tree removal (e.g., raised crown, exposed cambium) rather than inherent characteristics or natural damage. In essence, the Special Permit would authorize an activity that has already begun.

To address direct impacts associated with tree removal, CDFW recommends conducting work outside the marbled murrelet breeding season (March 24 – September 15), which would be inclusive of most other resident and migratory bird species. The nesting bird survey submitted with the application did not evaluate potential impacts to marbled murrelet, nor did it provide adequate survey coverage of the area potentially subject to noise disturbance. Any mitigation for the loss of the tree itself would likely be extensive and out-of-kind. CDFW is happy to discuss potential mitigation ideas with the County.

Thank you for the opportunity to comment on this Special Permit application.

Rebecca Garwood
Environmental Program Manager
California Department of Fish and Wildlife