

From: [Green, Alyssa@Coastal](mailto:Green,Alyssa@Coastal)
To: [Planning Clerk](#); [Whitney, Andrew](#)
Subject: RE: CDP application PLN-2025-19185
Date: Wednesday, March 19, 2025 10:15:27 AM
Attachments: [image001.png](#)

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Thank you Laura, looks like I fumbled the keys on the subject line. The correct application is PLN-2025-19185 as stated in the letter itself.

Thank you,

Alyssa (Aly) Green

Wildfire Resilience Analyst

California Coastal Commission

(707) 377-7621

Preferred Pronouns: (They/Them)



From: Planning Clerk <planningclerk@co.humboldt.ca.us>
Sent: Wednesday, March 19, 2025 10:11 AM
To: Whitney, Andrew <awhitney2@co.humboldt.ca.us>
Cc: Green, Alyssa@Coastal <Alyssa.Green@coastal.ca.gov>
Subject: FW: CDP application PLN-2025-19158

Good afternoon,
Please see the information below for referral response details related to the subject application.

The application number may be wrong here as 19158 is an Application Assistance meeting for Life Plan Humboldt.

Could it be 19185?

Laura McClenagan

From: Green, Alyssa@Coastal <Alyssa.Green@coastal.ca.gov>
Sent: Wednesday, March 19, 2025 10:00 AM
To: Planning Clerk <planningclerk@co.humboldt.ca.us>
Subject: CDP application PLN-2025-19158

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

Hello Andrew,

Thank you for consulting the California Coastal Commission regarding the submission of PG&E coastal development permit application PLN-2025-19185. We have reviewed the provided application materials and provided some feedback and suggestions below.

1. Att_01 and Att_02, The purpose of the work is stated but the basis for tree removal is not. We would suggest seeking further clarification for the need to remove the trees listed. Additional information such as the hazard posed by the trees (health status, lean, soil uplift, disease, etc.) and pictures, if possible, of any large wounds or lean to help substantiate the need.
2. We suggest inquiring about alternatives analysis due to the proximity of some of the removals to wetlands (WA 50) or Lagoons (WA 79 TAP) as well as removals within ESHA (WA 36-40 & 51-53 MCKAP, 46-49 TAP, 73-76 NCAP) If any reduction in scope is possible within ESHA or in wetlands, it would be advised. For example, directional pruning, crown reduction, or trimming in lieu of removal. See Esha References
[Section 3.41 of NCAP, Section 3.30 B of TAP, MCKAP 3.41](#)
3. Furthermore, Att_06_BCR identifies the potential to affect two special-status plant species, twelve special-status animal species, and nesting birds. The report does not recommend biological monitoring; however, it states work will occur in both federal threatened and state endangered species habitat. For example, work areas 36-40 occur directly in western bumble bee is state concern, 51-53 and 36 & 37 occur in steelhead habitat which is federally threatened, and work areas 46-49 occur in marbled murrelet which is federally threatened and state endangered. We strongly recommend, at minimum, biological monitoring for the duration of the work in areas (36-40, 46-49, and 50-53).
4. No mitigation has been identified in PG&E's application materials, we suggest seeking clarification on what mitigation will be provided outside of the MRHCP. Additionally, where applicable, we suggest adherence to Humboldt County's LCP
 - a. [313-33 R: Streams and Riparian Corridors Protection](#)
 - 33.1.10.2 "Mitigation measures for development with riparian corridors shall, at a minimum, include retaining snags within the riparian corridor

unless removal is required by CAL-OSHA regulations or for stream bank protection.”

- 33.1.10.3 “Retaining live trees with visible evidence of current use as nesting sites by hawks, owls, eagles, osprey, herons or egrets.”

- 33.1.11.2 “Where feasible, riparian vegetation shall be planted and maintained within the riparian corridor up to two hundred (200) feet landward of the bank protection project throughout its length”

5. Att_07 No tribal resources are described in the cultural report, however, we suggest adherence to the county regulation.

a. [313-16 A: Archaeological Resource Area Outside Shelter Cove](#)

- 16.1.5.1 Consultation with Indian Associations. “Prior to final approval or authorization of such development, the County shall consult with representatives of the Northwest Information Center of the California Archaeological Inventory (NICCAI), Department of Anthropology, Sonoma State University, and the Native American Heritage Commission (NAHC) and any known interested Native Americans. Such consultation will be directed to the questions of whether the project or operation will adversely affect Indian graves, cemeteries, burial grounds, or ceremonial sites, and whether there are reasonable alternative means of accomplishing the project or operation which would not adversely affect such graves, cemeteries, burial grounds or ceremonial sites.”

Thank you,

Alyssa (Aly) Green

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