



# COUNTY OF HUMBOLDT

For the meeting of: 5/15/2025

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File #: 25-660

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**To:** Zoning Administrator

**From:** Planning and Building Department

**Agenda Section:** Consent

**SUBJECT:**

PG&E Vegetation Management Coastal Development Permit (CDP)  
Record Number: PLN-2025-19170  
Assessor Parcel Numbers (APN): Listed in **Attachment 1D**

Various locations in the Humboldt Bay area, from the substation on Mitchell Heights Drive heading southwest along the transmission line and at locations around Redwood Acres, Cutten, and in the vicinity of the College of the Redwoods.

A Coastal Development Permit (CDP) for routine vegetation management along several transmission lines within Humboldt County including the Humboldt - Eureka 60 kilovolt (kV) line, the Humboldt Bay - Rio Dell Junction 60 kV line, and the CR-Humboldt Bay-Humboldt 115 kV line. The proposed scope of work includes the removal of 59 trees at 57 locations, and the removal of 20 brush units at one location, for a total of 58 locations. Of the 59 tree removals, all have a diameter at breast height (DBH) of 13-inches or greater. These locations are subject to the requirements of PG&E's Multiple Region Habitat Conservation Plan (MRHCP). The purpose of the vegetation removal is to maintain safe and reliable electric service and mandated clearance to comply with federal and State regulatory requirements for public safety and fire prevention.

**RECOMMENDATION(S):**

That the Zoning Administrator:

Adopt the Resolution, (Attachment 1) which does the following:

- a. Finds the project complies with the Humboldt Bay Area Plan and the Zoning Ordinance;  
and
- b. Finds the project exempt from CEQA pursuant to Section 15301 *Existing Facilities* and Section 15304 *Minor Alterations to Land* of the CEQA Guidelines, and that there is no substantial evidence that the project will have a significant effect on the environment;

and

- c. Approves the Coastal Development Permit subject to the conditions of approval (Attachment 1A).

#### DISCUSSION:

##### **Project Location:**

This project is in Humboldt County, along several transmission lines within Humboldt County including the Humboldt - Eureka 60 kilovolt (kV) line, the Humboldt Bay - Rio Dell Junction 60 kV line, and the CR-Humboldt Bay-Humboldt 115 kV line.

##### **Present General Plan Land Use Designation, Present Zoning:**

See table in **Attachment 1E**.

**Density:** Various.

##### **Environmental Review:**

Project is exempt from environmental review per Section 15301 *Existing Facilities* and Section 15304 *Minor Alterations to Land* of the CEQA Guidelines.

##### **State Appeal:**

Project is appealable to the California Coastal Commission.

**Major concerns:** None.

##### **Monitoring Required:**

None Required.

**Executive Summary:** Pacific Gas and Electric seeks a Coastal Development Permit (CDP) for PG&E to perform vegetation management along several of Pacific Gas and Electric's (PG&E's) distribution lines: Humboldt - Eureka 60 kilovolt (kV) line, the Humboldt Bay - Rio Dell Junction 60 kV line, and the CR-Humboldt Bay-Humboldt 115 kV line. The purpose of the vegetation removal is to maintain safe and reliable electric service and mandated clearance to comply with federal and State regulatory requirements for public safety and fire prevention. PG&E proposes vegetation management activities under or adjacent to multiple distribution lines throughout Humboldt County. As indicated in **Attachment 1C** and **Attachment 1D**, the work would be performed on or directly adjacent to 24 individual Assessor's parcels, within the "Local" jurisdiction of the Coastal Zone. One tree to be removed, tree number 53, is located within 100 feet of Ryan Slough, a mapped watercourse. Because tree #53 is located within 100 feet of the slough. The project does not obviously qualify as minor development due to the potential for impact to coastal resources due to the proximity to Ryan Slough. For these reasons, the project is appealable to the Coastal Commission. The project does not include tree removal in design review combining zones and the work is necessary to carry out

activities authorized by an approved permit, the safe operation of electrical distribution infrastructure, therefore special permits are not required.

Tree crews will use existing roads to bring vehicles and equipment close to the work areas. Vehicles and equipment will remain on existing roads and trees will be accessed on foot. The equipment to be utilized includes hand tools, bucket trucks, chippers, and chainsaws. All cut vegetation will be either lopped and scattered or dragged off-site and chipped if accessible. Herbicide use is not prescribed as part of project activities.

Based on **Attachment 2A**, Tree Data Table, trees, including: one alder, one ash, 44 coast redwood, three Douglas fir, three Grand fir, and 11 spruce. These trees range from 13 - 79 inches diameter at breast height (DBH) and are between 22 and 147 feet tall. The remaining work sites is a brush removal of 20 scrubby Douglas fir listed at 3" DBH or less.

A *Biological Constraints Report* (Biological Report) was prepared by Sara Viemum with Stantec on November 25, 2024 (**Attachment 2B**). As noted in the Biological Report, desktop review of the project area indicated the associated vegetation management work proposed by the applicant has the potential to affect one special-status plant species, nine special-status wildlife species, roosting bats, and nesting birds. Special Status is defined as Federally Endangered, Threatened, Proposed Endangered, Proposed Threatened or Candidate (FE, FT, FPE, FPT, FC); State Endangered, Threatened, Candidate, Rare or Species of Special Concern (SE, ST, SC, SR, SSC); Fully Protected (FP); species covered by the Bald and Golden Eagle Protection Act (BGEPA); California Rare Plant Ranks (CRPR) 1 or 2 (1B.x, 2B.x); and California Department of Fish and Wildlife Species of Special Concern (SSC). The work areas fall within the coverage area for the PG&E Multiple Region Operations and Maintenance Habitat Conservation Plan (MRHCP), under which the work activities are classified as E10a (Vegetation Management - Routine Maintenance). All work will adhere to the Best Management Practices (BMPs) established in the MRHCP. Additionally, several vegetation types and plant communities are located within work areas, Coastal Prairie, redwood forest, North Coastal Forest, Closed-Cone Pine Forest, and Riparian Woodland. The Biological Report notes that the project work areas may include suitable habitat for the Western lily (*Lilium occidentale*). Although suitable habitat is present, the work plan includes no ground disturbance or overland vehicular access. Given the age and limited data of the overlapping occurrences and with the implementation of the project BMPs, impacts to this species are not expected. The implementation of BMPs will minimize potential impacts to these species; with the implementation of BMP impacts to special-status plants will be less than significant.

Steelhead, and other aquatic species: Work area 18 is within 250 feet of a mapped perennial tributary of Redwood Creek. There is no barrier to fish passage, and work area 18 is approximately 212 feet away from a mapped perennial tributary of Redwood Creek. The work area is separated from the stream by Hufford Rd. Work areas 22 and 23 are within 250 feet of a mapped intermittent tributary of Freshwater Creek. The work areas are separated from the stream by Woodgulch Rd. Additionally,

another CNDDDB record (2020) maps the presence of steelhead in Redwood Creek, an anadromous mapped perennial stream. Work area 18 is within 250 feet of a mapped perennial tributary of Redwood Creek. Work area 18 is separated from the stream by Hufford Rd. Given the distances to the streams, impacts to aquatic resources are less than significant.

Wildlife species: There is one occurrence of Bald Eagles (2005) within 1.5 miles of work areas. Between January 15 and July 31, work activities could disturb nesting individuals. There are large aquatic resources including the Elk River and Martin Slough within 0.5 miles the work areas and Work Areas 11-19, 57 and 58 may provide nesting habitat. The project proposes removing trees within 250 feet of aquatic habitat for Coho salmon, Longfin smelt, Tidewater goby, Steelhead, Southern green sturgeon, and the Eulachon. Work area 53, a Grand fir with decline necrosis observed, is within 65 feet of Ryan Slough. The trees to be removed within the 250-foot buffer zone of the aquatic habitat are located on the opposite side of roads from the habitat. The PG&E Best Management Practices require trees within 250 feet of aquatic habitat be felled directionally away from water courses or that the trees are brought down in pieces to minimize impacts. With implementation of the Multi-Region Habitat Conservation Plan and PG&E Best Management Practices for all Vegetation Management Activities (**Attachment 2D**), impacts to this species are not anticipated.

### **Northern spotted owl**

There are 133 positive CNDDDB occurrences between 1981-2022; 5 activity centers, one abandoned, 2001-2016) within 1.5 miles of the work areas. One nest (1994) is within 0.25 miles of Work Area 12. Additionally, PG&E data indicates northern spotted owl habitat may be present in the project vicinity. Northern spotted owl suitable habitat includes older forest habitats that contain the structural characteristics required for nesting, roosting, and foraging. Specifically, forests with multistory canopies dominated by large trees, old-growth forests and mixed stands with old-growth and mature trees, and where there is a high level of structural complexity, and an abundance of large, downed woody debris. Northern spotted owls occur from 70 feet to 6,660 feet in elevation and typically nest March to June. Based on the Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California (U.S. Fish and Wildlife Service 2006), the existing ambient conditions would be considered 'moderate' for work areas near small roads, and residential homes. Project work would be considered 'very high' due to the use of a chipper in addition to other equipment. According to the document, very high' action-generated activities occurring in 'moderate' ambient conditions can cause project attenuation to exceed established take thresholds within 330 feet of the project work areas. There may be nesting habitat for northern spotted owl within 330 feet of Work Areas 2-9, 12-36, and 54-58. However, due to the amount of surrounding development and overwhelmingly negative survey occurrences per the Biological Report, work associated with the project falls within PG&E's *Multi Region Operations and Maintenance Habitat Conservation Plan* (MRHCP). All work locations fall under the MRHCP activity type E10a (Vegetation Management Routine Maintenance). The MRHCP provides PG&E with federal take authorization for all gas and electric operation and maintenance activities in the Plan Area during the 30-year permit term. In addition, PG&E proposes implementation of standard Vegetation

Management best management practices (BMPs) and Avoidance and Mitigation Measures (AMMs) in accordance with the MRHCP. Implementation of these practices and measures would minimize impacts. Conditions of approval require implementation of these measures (**Condition of Approval A.2**), and prohibit the use of herbicides under the project (**Condition of Approval A.4**) to ensure impacts associated with the project are minimized. The BMPs and MRHCP applied for the northern spotted owl provide habitat and take protections for bald eagles and other nesting birds. This includes a requirement to conduct vegetation removal and tree removal outside the bird nesting season unless a qualified ornithologist have surveyed the area to determine whether active nests are present, and if so to work with CDFW to develop appropriate buffers (**Condition of Approval A.3**).

Tree removal on property utilized for residential and public use is an allowed accessory use of land. Due to the adjacency to critical public infrastructure and the habitat conservation conditions applied to the project the proposed tree removal is deemed consistent with the Streams and Riparian Corridor Protection, Flood Hazard Area, Coastal Wetlands, and Transitional Agricultural Lands combining zone criteria needed to make a finding of approval for the Coastal Development Permit in the combining zone. Under the Humboldt County Code, where the tree removal is to involve a commercial species and generate a profit, the tree removal would constitute commercial timber production and a use permit would be required. In the present case, the tree removal would not constitute commercial timber production because the removal will not result in a net profit after deducting the cost of permitting and tree removal. The project is conditioned to require the applicant to furnish documentation verifying that the activity at completion is not a for-profit operation. If the property owner requests it, the fallen trees will be left onsite.

A referral response from the Northwest Information Center indicated that cultural resources research had identified previously recorded cultural resources intersecting the area of potential effect, and the local Native American tribe(s) should be contacted regarding traditional, cultural, and religious heritage values. The project conditions require compliance with the Cultural Resources Summary submitted as an attachment to the project. The proposed vegetation management work requires standard Best Management Practices (BMPs) which include the Inadvertent Discovery and Human Remains protocols. With the implementation of Resource Protection Measures (RPM) identified in the Cultural Resources Summary, impact to cultural and historic resources will be less than significant.

Per comments received from the Department of Public Works, Land Use Division in July 2023, the Department issues Annual Encroachment Permits to utility companies. PG&E obtains an Annual Encroachment Permit yearly from this Department and is responsible for complying with the terms of the encroachment permit (see **Conditions of Approval 5-10**). Any work to occur within the State right-of-way would require an Encroachment Permit from the California Department of Transportation (Caltrans). The project was referred to Caltrans on 05/30/2024. No response was received from Caltrans however, worksites 8, 49, 50, and 53 -58 may require crews to access the trees from the shoulder of Highway 101. As such, a site-specific encroachment permit would be required to park and stage equipment within the Caltrans-controlled access right-of-way. A single permit could likely be

issued which covers all locations within the State right-of-way where access to the trees would be needed. Conditions of approval require obtaining an Encroachment Permit from Caltrans, as necessary, for any work to be performed within the State right-of-way (**Condition of Approval A.11**).

On February 28, 2025, the Planning Department received referral comments from the Coastal Commission. Commission staff requested more information on the justification for the removals and more details on the methods and practices for tree removals. In response the applicant provided a revised tree data table (**Attachment 2A**) included a column for the observed hazard for each tree. Regarding requirements and standard practices for leaving woody materials on property, PG&E stated that tree branches and limbs that are less than four inches in diameter are either chipped and hauled away or cut into smaller pieces and spread on site. Larger wood remains in a safe position on site as this wood legally belongs to the property owner.

#### OTHER AGENCY INVOLVEMENT:

The project was referred to responsible agencies and all responding agencies have recommended approval or conditional approval. (Attachment 3)

#### ALTERNATIVES TO STAFF RECOMMENDATIONS:

The Zoning Administrator could elect to add, modify or delete conditions of approval. Staff has concluded the required findings in support of the proposal can be made.

#### ATTACHMENTS:

1. Draft Resolution
  - A. Conditions of Approval
  - B. Project Description
  - C. Project Location Maps
  - D. List of Project Parcels and Landowners
  - E. Present General Plan Land Use Designation, Community Plan, and Present Zoning
2. Applicant's Evidence in Support of the Required Findings
  - A. Tree Data Table
  - B. Biological Constraints Report
  - C. Vegetation Management - Best Management Practices
  - D. Multi-Region HCP Measures - General Field Protocols
  - E. Response to CA Coastal Commission referral comments
3. Referral Agency Comments and Recommendations
  - A. Humboldt County Department of Public Works, Land Use Division
  - B. CA Coastal Commission referral comments

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**APPLICANT, OWNER, AGENT AND PLANNER INFORMATION:**

**Applicant**

Pacific Gas & Electric Company  
850 Stillwater Road  
Sacramento, CA 95605

**Owners**

See Attachment 1D

**Agent**

None

Please contact Andrew Whitney, Associate Planner, at 707-268-3735 or by email at [awhitney2@co.humboldt.ca.us](mailto:awhitney2@co.humboldt.ca.us) <<mailto:awhitney2@co.humboldt.ca.us>>, if you have any questions about the scheduled item.