

From: [Nicole Reese](#)
To: [Whitney, Andrew](#)
Cc: [Nicole Reese](#)
Subject: RE: PLN-2025-19170 - PGE Bundle #7
Date: Tuesday, April 1, 2025 4:04:05 AM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[Att_02_Tree_Data_Sheet_Updated_March2025.pdf](#)

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Good morning Andrew:

Please see the information requested.

1. Att_07_CRRCR the wording of the document suggests the work is “distribution”, however the stated scope of work is transmission. Is this a typo? [Yes this is a mistake. This is transmission vegetation management work.](#)
2. Would it be possible to add a reason/basis column to Att_01_Project Description that would indicate health status, lean, soil uplift, disease, proximity to powerline etc?
[Attachment 2 - Tree Data Table; Work Areas and Scope of Work \(attached\) has been updated to include further clarification on the field observations that led PG&E to determine that the trees were a risk to their electric transmission assets.](#)
3. Would you provide a bit of information on method of removal?
[To perform the scope of work, crews will utilize hand and gas-powered tools \(chainsaws, hand saws, pruners, chipper, and lift truck where accessible\). Chainsaws will be the primary method utilized to fell the trees.](#)

[For work within an aquatic zone or aquatic buffer zone, such as adjacent to waterways and wetlands, PG&E will implement their standard Vegetation Management Best Management Practices \(BMPs\) and Avoidance and Mitigation Measures in accordance with the Biological Constraints Report \(Attachment 6\) and PG&E's Multiple Region Habitat Conservation Plan \(MRHCP\).](#)

[The scope of work that is proposed includes vegetation activities that require the crew to follow the MRHCP Vegetation Management BMPs 1-27 \(Attachment 10\). Special attention shall be given to the following:](#)

- [BMP 4:](#) Vehicles and equipment must use pavement, existing roads, and previously disturbed areas to the extent practicable.
- [BMP 8:](#) Vehicles and heavy equipment must be refueled at least 100 feet away from riparian areas. Handheld tools must be refueled outside of riparian areas. The fueling operator must stay with the fueling operation at all times. Do not top off tanks.
- [BMP 11:](#) Vehicle use within riparian areas is limited to existing roads and dry crossings, and they must be checked and maintained daily to prevent leaks of materials that, if introduced to water, could be harmful to aquatic life.
- [BMP 12:](#) Cleared or pruned vegetation and woody debris (including chips) must be disposed of in a manner to ensure that it does not enter surface water or a watercourse. All cleared vegetation and woody debris (including chips) must be removed from surface water or watercourses, and placed or secured where it cannot re-enter the watercourse.
- [BMP 22:](#) Disturbance or removal of non-target vegetation within a work site should not exceed the minimum necessary to complete operations, subject to other public health

and safety directives governing the safe operations and maintenance of electric and gas facilities.

Additionally, the *PG&E Measure for Tree Felling and Removal Directionally* requires that crews fell trees away from an exclusion zone if an exclusion zone has been defined. If this is not possible, the crews are to remove the tree in sections. Crews will avoid damage to adjacent trees to the extent possible. Crews will avoid removal of snags and conifers with basal hollows, crown deformities, and/or limbs over 6 inches in diameter.



ERM

Sustainability is our business

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From: Reese, Nicole <Nicole.Reese@pge.com>
Sent: Wednesday, March 12, 2025 12:56 PM
To: Nicole Reese <NICOLE.REESE@ERM.COM>
Subject: Fw: PLN-2025-19170 - PGE Bundle #7

EXTERNAL MESSAGE

Classification: Internal

From: Whitney, Andrew <awhitney2@co.humboldt.ca.us>
Sent: Tuesday, March 11, 2025 11:42 AM
To: Reese, Nicole <Nicole.Reese@pge.com>
Subject: PLN-2025-19170 - PGE Bundle #7

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Hello Nicole, I am the planner working on the Coastal Development Permit , PLN-2025-19170 - PGE Bundle #7. We received some comments from the coastal commission which raised some questions for me. Please see my comments below in red

1. Att_07_CRCR the wording of the document suggests the work is “distribution”, however the stated scope of work is transmission. Is this a typo?
2. Would it be possible to add a reason/basis column to Att_01_Project Description that would indicate health status, lean, soil uplift, disease, proximity to powerline etc?
3. Would you provide a bit of information on method of removal?

Please let me know if you have questions or concerns about providing this additional information. Thank you



Andrew Whitney
Associate Planner
Planning and Building Department
Direct: 707-268-3735
3015 H Street, Eureka CA
New office hours: M-Th 8:30-2:00, Closed on Friday

From: Green, Alyssa@Coastal <Alyssa.Green@coastal.ca.gov>

Sent: Friday, February 28, 2025 10:24 AM

To: Planning Clerk <planningclerk@co.humboldt.ca.us>

Cc: Prahler, Erin@Coastal <Erin.Prahler@coastal.ca.gov>

Subject: PLN-2025-19170 - PGE

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Hello Andrew,

Thank you for consulting the California Coastal Commission regarding the submission of the PG&E coastal development permit application (PLN-2025-19170). We have reviewed the provided application materials and provided some feedback and suggestions below.

1. Att_07_CRCR the wording of the document suggests the work is “distribution”, however the stated scope of work is transmission. This is most likely a typo, but we suggest clarifying.

Is this a typo?

2. 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.

Would it be possible to add a reason/basis column to Att_01_Project Description that would indicate health status, lean, soil uplift, disease, proximity to powerline etc?

3. Per LCP Ch. 3. 30236. E, we suggest inquiring about alternatives analysis due to the proximity of some of the removals to riparian areas. Moreover, many trees to be removed are well established, large DBH trees which may provide other ecological benefit including but not limited to wind break for the interior stand (as mentioned in the county's coastal reg. 313-64.1.4.4). If any reduction in scope is possible within ESHA or the bordering tree line, it would be advised. I think adding a reason for the removal of each tree would address this concern.
4. Att_01 The method of removal is not stated in the project description. We suggest asking for further clarification of how larger trees will be removed and if any felling will occur within an aquatic zone or aquatic buffer zone. Would you provide a bit of information on method of removal?
5. In accordance with the county's reg. (3115-3), it is suggested to inquire about a debris removal plan. Will debris cause fuel loading, or will debris contribute to soil compaction of tree root zones? I think this can be addressed in the conditions of approval
6. Att_06_BCR Does not recommend a biological review, however the report states sensitive species such as Coho salmon, steelhead, southern green sturgeon occur within 250' of work as well as a known occurrence of Bald eagle habitat within 1.5 miles of the work sites and known Northern spotted owl habitat near work areas (12-19, 58). We strongly recommend biological survey and monitoring for the duration of the work. I think this can be addressed in the conditions of approval
7. No mitigation has been suggested by PG&E's application materials. Seeking clarification on what mitigation will be provided in the case of unintended impacts. We suggest adherence to LCP Ch. 3. 30236. F "Mitigation measures for development with riparian corridors shall, at a minimum, include retaining snags within the riparian corridor unless felling is required by CAL-OSHA or permitted by California Department of Forestry forest and fire protection regulations, and retaining live trees with visible evidence of current use as nesting sites by hawks, owls, eagles, osprey, herons, or egrets."
8. Att_07 No tribal resources are described in the cultural report, however, we suggest adherence to the county coastal reg. 313-16.1.5.1 where tribal consultation is sought prior to approval of the permit. I think this can be addressed in the conditions of approval
9. LCP 3.40 Visual resource protection, will the proposed project interrupt the visual landscape or coastal view areas? I think adding a reason for the removal of each tree would address this concern

Thank you,

Alyssa (Aly) Green

Wildfire Resilience Analyst

California Coastal Commission

(707) 377-7621

Preferred Pronouns: (They/Them)



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