



COUNTY OF HUMBOLDT

For the meeting of: 10/2/2025

File #: 25-1188

To: Zoning Administrator

From: Planning and Building Department

Agenda Section: Consent

SUBJECT:

PG&E Vegetation Management Bundle 8 Distribution Coastal Development Permit (CDP) and Special Permit

Record Number: PLN-2025-19272

Assessor Parcel Numbers (APN): Listed in **Attachment 1C**

The project site is located along several PG&E 12-kilovolt transmission lines spanning from the Humboldt Bay area up to the Orick area. This includes areas around Ferndale, Fernbridge, Loleta, Mytletown, Mitchell Heights, Indianola, Arcata, McKinleyville, Trinidad, Sue-Meg State Park, Big Lagoon, and Orick.

A Coastal Development Permit (CDP) and Special Permit for routine vegetation management along several 12-kilovolt distribution lines within Humboldt County, covering the Humboldt Bay area up to the Orick area. The proposed scope of work includes the felling of 84 trees at 75 work areas and the removal of 213 brush units at 33 work areas. All of the trees being felled are greater than 12 inches in diameter at breast height (DBH) or greater, with a maximum DBH of 99 inches and a maximum height of 180 feet. These locations are subject to the requirements of PG&E's Multiple Region Habitat Conservation Plan (MRHCP). A Special Permit is required for Design Review where necessary.

RECOMMENDATION(S):

That the Zoning Administrator:

1. Adopt the resolution, (Attachment 1), which does the following:
 - a. Finds the project complies with the Eel River Area Plan, Humboldt Bay Area Plan, McKinleyville Area Plan, North Coast Area Plan, Trinidad 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 and Special Permit subject to the conditions of approval (Attachment 1A).

DISCUSSION:

Project Location: The project site is located along several PG&E 12-kilovolt transmission lines spanning from the Humboldt Bay area up to the Orick area. This includes areas around Ferndale, Fernbridge, Loleta, Mytletown, Mitchell Heights, Indianola, Arcata, McKinleyville, Trinidad, Sue-meg State Park, Big Lagoon, and Orick.

Present General Plan Land Use Designation, Present Zoning, and Coastal Zone Jurisdiction:
See table in **Attachment 1D**.

Environmental Review:

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

State Appeal:

The 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) and Special Permit for PG&E to perform vegetation management along several Pacific Gas and Electric (PG&E) 12kV distribution lines. 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 40 individual Assessor's parcels. Ten work sites are in the appeal jurisdiction of the Coastal Zone; the remainder are in the local jurisdiction. The project does not qualify as minor development due to the potential for impact on coastal resources and the proximity of some work areas to wetlands and watercourses. For these reasons, the project is appealable to the Coastal Commission, and a hearing is required. The project involves 11 parcels in design review, combining zones. It includes a review of pertinent design guidelines for removing these trees. However, the work is necessary to carry out activities authorized

by an approved permit and ensure 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: twenty-two coast redwoods, twenty-two Willows, twenty spruce, ten alders, ten Cascara, seven Douglas firs, six Monterey Cypress, five Grand Firs, two Monterey pines, two Elderberries, two pines, one Blackwood Acacia, and one Cypress are scheduled for removal. These trees range from 1 to 99 inches in diameter at breast height (DBH) and are between 11 and 180 feet tall. The remaining work sites are for brush removal of Cascara, Willow, and Acacia, listed at 3" DBH or less.

A *Biological Constraints Report* (Biological Report) was prepared by Freida Galindo, with PG&E, on March 19, 2025 (**Attachment 2B**). As noted in the Biological Report, a desktop review of the project area indicated that the associated vegetation management work proposed by the applicant has the potential to affect two special-status plant species, twelve special-status animal species, 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 Coastal Zone and are subject to PG&E's 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 that include Mixed Conifer, Riparian, Freshwater Wetlands, Agricultural Lands, as well as both Rural and Urban landscapes.

The Biological Review notes that the project work areas may include suitable habitats for several Special Status Species, which include the Alpine marsh violet (*Viola palustris*), Pink sand-verbena (*Abronia umbellata ssp. Breviflora*), and the Scouler's catchfly (*Silene scouleri ssp. Scouleri*). Although suitable habitat is present, the work plan includes no ground disturbance or overland vehicular access. With the implementation of the Vegetation Management Best Management Practices, impacts to these species are not expected. The implementation of BMPs will minimize potential impacts to these species, with implications for special-status plants being less than significant.

Steelhead and other aquatic species:

The Biological Review provided by the applicant found that, according to the National Hydrography Dataset and National Wetlands Inventory mapping, work areas 41, 42, 44, 52, 70, 71, 73, and 100 are within 250 feet of an intermittent riverine system. Furthermore, work areas 24, 25, 36, 37, 40, 57, 84-86, 100, and 101 are within 250 feet of a perennial stream and/or a freshwater emergent wetland. Lastly, work areas 50 and 51 are within 250 feet of a mapped estuarine and marine wetland. After reviewing Attachment 2A, Tree Data Table, the staff has concluded that only work areas 25, 41, and 52 of the proposed tree removals are within 100 feet of fish-bearing waterbodies. There will be brush removal in work areas 84-86 that occurs within 50 feet of Williams Creek east of Ferndale; however, the removal of the brush does not constitute significant vegetation removal and can be conducted without impacts to aquatic habitat.

The PG&E Best Management Practices require trees within 250 feet of aquatic habitat to be felled directionally away from water courses or that the trees be brought down in pieces to minimize impacts. The implementation of PG&E's Multiple Region Operations and Maintenance Habitat Conservation Plan (MRHCP) will reduce impacts to aquatic resources and species to a less-than-significant level for the proposed removal of trees and brush.

Northern Spotted Owl

This project has the potential to have Northern Spotted Owl within the project area. These work sites within a mile and a half of documented Spotted Owl nesting sites include the areas of Orick (1-11), Sue-meg State Park (57-74) Dows Prairie (101, 102), Mytletown and Freshwater Corners (14-48) 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 from March to June. Based on 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, and "high" near major highways such as Highway 101. Project work would be 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.

Per the biological review, work areas 13, 36, and 55-73 have the highest potential for Northern Spotted owl nesting, but there are no known nesting sites within .25 miles of any work area. 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 AMM (**NSO-1**) in the Biological Constraints Report minimizes impacts below a level of likely significance. 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.5**) to ensure impacts associated with the project are minimized. The BMPs, AMM, and MRHCP applied for the northern spotted owl provide habitat and take protections for marbled murrelet, northern spotted owl, and other nesting birds.

Marbled Murrelets

This project has the potential to have Marbled Murrelet within the project areas. This includes work areas 56-73. These work areas, situated between Partick's Point Drive and Highway 101, are characterized by existing noise conditions that are considered "moderate" or "high". Between January 15 and July 31, work activities could disturb nesting individuals. With implementation of the Multi-Region Habitat Conservation Plan and PG&E Best Management Practices for all Vegetation Management Activities (**Attachment 2C**), and the Avoidance and Minimization Measures (**MM1**) identified in the Biological Constraints Report (**Attachment 2B**), impacts to this species are not anticipated. As with the Northern Spotted Owl, work will be scheduled outside of nesting periods and/or conditioned to use Best Management Practices to mitigate adverse effects on wildlife. When work is to occur during the nesting season, the use of large chainsaws and chippers should be minimized. Project equipment shall utilize lower volume equipment, which includes hand tools, hydraulic pruners, and chainsaws with a 25-foot load max dBA rating under 90 decibels, when limbing and climbing trees to the extent feasible.

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.

A review by County staff of the proposed work site locations found tree and brush removal will result in or near sensitive habitats including emergent wetlands, streamside management area, Coastal Scenic Areas, and Coastal View Areas. Work site locations 93 and 94 will include brush removal in emergent wetlands, while brush removal will occur in Streamside Management Areas located at sites 74-76 and 84-86. Other Streamside Management Areas that include tree removal will occur at sites 25, 26, 36, 41, 42, 100, and 101. Finally, fourteen (14) trees are proposed for removal in Coastal Scenic

Areas or Coastal View Areas. None of these trees are themselves identified as significant resources.

The project is not expected to have significant impacts on sensitive species, watercourses, or sensitive habitats. Pacific Gas and Electric prepared a *Biological Constraints Report* (Biological Report) on March 19, 2025. The Biological Report notes that the project work would occur in areas with potential habitat for exceptional status wildlife and nesting birds. Nesting habitat for Northern Spotted Owls and Marbled Murrelets is in the vicinity of the project. However, given the limited scope of work, the selective removals of hazard trees, the surrounding development, and overwhelmingly negative survey occurrences per the Biological Report and with the implementation of the Avoidance and Mitigation Measures (AMM) in the Multiple Region Operations and Maintenance Habitat Conservation Plan (MRHCP), impacts to Physical and Biological Features will be minimized.

Conditions of the project require that cut vegetation and debris be kept out of waterbodies. With the implementation of the Avoidance Mitigation Measures, no impacts are anticipated on aquatic species. 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. The Biological Constraints Report states that the "nesting bird season" is from February 15 to August 31. The project is conditioned to occur outside of this nesting bird season.

Additionally, PG&E proposes implementing standard Vegetation Management best management practices (BMPs) and avoidance and mitigation measures by the MRHCP. Implementation of these practices and measures would minimize impacts, and no risk of substantial adverse impacts is anticipated. The California Department of Fish and Wildlife (CDFW) had no comments in response to the project referral. Conditions of approval require implementation of these measures and prohibit the use of herbicides under the project to ensure impacts associated with the project are minimized.

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. NWIC also requested that inadvertent archaeological discovery protocols be in place for any ground-disturbing activities that will take place in the future. 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, the impact on cultural and historic resources will be less than significant.

Per comments received from the Department of Public Works, Land Use Division on June 16, 2025, 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 6-11**). 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 June 13, 2025. No response was received from Caltrans. Worksites 50-52 are accessed from Highway 101, and 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 that 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**).

Several of the work locations include tree and brush removal within California State Parks. The project was referred to California State Parks on June 13, 2025. No response was received. These parks include Sue-Meg State Park, Trinidad State Beach, and Little River State Beach. Trees in work areas 56-73 are within the Sue-Meg State Park and are subject to the Trinidad Area Plan (TAP) Local Coastal Program, with some work areas within the North Coast Area Plan. Vegetation removal work areas 53-55 are also in the Trinidad Area Plan and are within the boundaries of Trinidad State Beach. Finally, work areas 50 and 51 are within Little River State Beach and under the McKinleyville Community Plan (MCAP). Above-ground power lines less than 30KV are allowed under TAP Coastal Scenic Area Section 3.a.(2). The removal of these trees is necessary for the continued safe operation of the 12KV distribution line. It will not have significant negative impacts on the area's viewshed.

There would be no significant change to visual resources resulting from the proposed project. The project would result in the removal of 84 trees adjacent to or under electrical distribution lines. Tree removal for the maintenance and protection of public infrastructure is an allowed accessory use to the residential, agricultural, timberland, and public uses of the sites. There are 13 trees proposed for removal in Coastal Scenic areas as part of this project, with 12 of these trees located on state park lands.

The project will not pose detrimental threats to properties in the vicinity nor pose any public health hazard. The applicant provided Attachment 2A - Tree Data Table that describes the reasons for the removal of each tree. The 80 trees to be removed have been deemed incompatible with the safe, reliable operation of the 12KV distribution lines due to the possibility of the trees falling or shedding branches during winter storm events. It is easier and safer for workers to address tree hazards in periods of good weather than to have to address trees and electrical infrastructure damage after a winter storm or wind event. The interruption of electrical service can be dangerous for certain people suffering from medical conditions; performing routine vegetation management preemptively reduces the likelihood of outages and their duration, which may save some lives among the physically infirm.

On June 27, 2025, the Planning Department received referral comments from the California Coastal Commission. Commission staff requested tribal consultation in project areas 1-13, 20-51, 74-32, and 95-106, which is consistent with Humboldt County Code 313-16. Furthermore, the Commission requested that the removal of trees within the wetland environment maintain snags where possible. PG&E has 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 onsite. 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 that the required findings in support of the proposal can be made.

ATTACHMENTS:

1. Draft Resolution
 - A. Conditions of Approval
 - B. Project Locations
 - C. List of Project Parcels and Landowners
 - D. 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
3. Referral Agency Comments and Recommendations
 - A. Humboldt County Department of Public Works, Land Use Division
 - B. California Coastal Commission referral comments

APPLICANT, OWNER, AGENT, AND PLANNER INFORMATION:

Applicant

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

File #: 25-1188

Owners

See Attachment 1C

Agent

None

Please get in touch with Michael Kein, Associate Planner, at 707-268-3739 or by email at MKein2@co.humboldt.ca.us <<mailto:MKein2@co.humboldt.ca.us>>, if you have any questions about the scheduled item.