



COUNTY OF HUMBOLDT

For the meeting of: 11/6/2025

File #: 25-1316

To: Zoning Administrator

From: Planning and Building Department

Agenda Section: Consent

SUBJECT:

PG&E Vegetation Management Bundle 9 - Transmission Coastal Development Permit (CDP)

Record Number: PLN-2025-19287

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

The project site is located along two PG&E 60 kilovolt transmission lines spanning from the Humboldt Bay area up to the Orick area.

A Coastal Development Permit (CDP) for routine vegetation management along two 60 kilovolt transmission lines within Humboldt County covering the Humboldt Bay area up to the Orick area. The proposed scope of work includes the removal of 225 trees at 221 locations. These locations are subject to the requirements of PG&E's Multiple Region Habitat Conservation Plan (MRHCP). Equipment to be utilized for this project will include hand and gas-powered tools: chainsaws, hand saws, pruners, chippers, and lift truck where accessible. No ground disturbance in the form of excavation is associated with this work, nor would herbicide be utilized. Tree crews will use existing roadways, driveways, and hiking trails as appropriate. A Special Permit is required for Design Review where necessary.

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 North Coast 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 60-kilovolt distribution lines spanning from the Humboldt Bay area up to the Orick area. This includes areas around Myrtletown, Manila, Mitchell Heights, Indianola, Big Lagoon, Stone 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 routine vegetation management along several 60 kilovolt transmission lines within Humboldt County covering the Humboldt Bay area up to the Orick area. The proposed scope of work includes the removal of 225 trees at 221 locations. 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. As indicated in **Attachment 1B** and **Attachment 1C**, the work would be performed on or directly adjacent to 45 individual Assessor's parcels. Twelve 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 includes the review of pertinent design review guidelines for the removal of these trees; however, 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. It includes a review of pertinent design guidelines for removing these trees.

Equipment to be utilized for this project will include hand and gas-powered tools: chainsaws, hand

saws, pruners, chipper, and lift truck where accessible. No ground disturbance in the form of excavation is associated with this work, nor would herbicide be utilized. Tree crews will use existing roadways, driveways, and hiking trails as appropriate. No other development is proposed under the project.

Based on **Attachment 2A**, Tree Data Table, trees, including: 25 alders, 6 Cascara, 6 Douglas firs, a Fir, 9 Grand fir, a Hemlock, a Madrone, 101 coast redwoods, 74 spruce, and a willow are scheduled for removal. These trees range from 13 to 99 inches in diameter at breast height (DBH) and are between 19 and 208 feet tall.

A *Biological Constraints Report* (Biological Report) was prepared by Kevin Lash, Akshita Singh, and Kasey MacRae with ERM, 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 twelve special-status plant species, fourteen 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 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. Habitat types and plant communities located within work areas include redwood-Sitka spruce forest habitat, mixed conifer, riparian, freshwater wetlands, as well as both Rural and Urban landscapes.

The Biological Review notes that the project work areas may include suitable habitats for numerous Special Status Plant and Animal Species. Avoidance and Mitigation Measures (AMM's) and Best Management Practices (BMP) identified in the Biological Constraints Report (**Attachment 2B**) and emphasized in the Conditions of Approval (**Attachment 1A**) will be implemented to ensure impacts to these species are not significant.

Design Review and Scenic Resources

The project involves 23 parcels within the design review combining zone. Of those, four are in the Humboldt Bay Area Plan and the remaining 19 are in the North Coast Area Plan. Of these 23 parcels there are three that are in the Appeal Jurisdiction of the Coastal Zone. Within these three parcels there are five trees planned for removal as part of this project. These trees are also located in a Coastal Zone Scenic Area. Two of these trees, tree I.D. 207 and 209, are located to the east of Highway 101 in a viewshed that includes the electrical transmission line. These trees are spruce and redwood, 87 and 98 feet tall respectively. Two of the trees in the coastal scenic area are west of Highway 101. These trees are a 98-foot-tall Alder, tree I.D. 211, and a 20-foot-tall Willow, tree I.D. 212.

Per section 3.42 of the North Coast Area Plan, in Coastal Scenic Areas and Coastal View Areas, tree removal must minimize visual impact and adhere to standards for protecting natural landforms and scenic views. Given their location next to critical electrical infrastructure and the fact that they are nestled amongst similar trees, the impact on scenic views is limited. Coastal views are typically focused on the coast. The two trees on the west of Highway 101 are deciduous trees, shorter in stature and not the iconic redwoods that are fixtures of Humboldt County coastal views. The purpose of the proposed tree removals is to maintain existing critical infrastructure and maintain mandated clearance distances to vegetation. The removal of these trees may make the visual impact of the power lines more prominent in the viewshed, however this is not a new impact on the viewshed and as such is not in conflict with the standards set in the North Coast Area Plan and the design review combining zone.

Biological Resources and Potential Impacts

Plant Species: A desktop review of California Natural Diversity Database (CNDDDB) conducted as part of the *Biological Constraints Report, ERM, April 2025*, identified twelve special-status plant species that may be present within a search radius of 1.5 miles around the project locations. Species include Alpine marsh violet, Bristle-stalked sedge, Deceiving sedge, Ghost-pipe, green yellow sedge, Howell's montia, Maple-leaved checkerbloom, Marsh pea, Minute pocket moss, Running-pine, Seaside bittercress, and Woodnymph. The project does not include grading or ground disturbing activities, because of this, impacts to understory plants will be limited. With the implementation of Best Management Practices in the Biological Constraints Report (**Attachment 2B**), impacts to these species are not expected.

Animal Species:

Steelhead and other aquatic species:

The Biological Review provided by the applicant found that Work area 109 is within 15 ft of Tom Creek and work area 110 is within 50 ft of Tom Creek. Fish passage data shows there is no barrier between work areas and the Pacific Ocean and Big Lagoon, and this species has potential to occur at work areas 109 and 110. A biological monitor is required at work areas 109, 110 (within streamside management area of Tom Creek, and work area 217 (within 50 feet of NWI mapped wetlands). The Vegetation Management Contractor must contact the Environmental Field Coordinator for a minimum of two weeks prior to work to schedule biological monitor (**Condition of Approval 6** and **Condition of Approval 2a**). With the implementation of Aquatic and Riparian AMMs and BMPs and the presence of a biological monitor, impacts are not expected to occur.

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 and other nesting birds

The Northern Spotted Owl (NSO) is listed as Threatened under both the federal Endangered Species Act (ESA) and the California Endangered Species Act (CESA). It is also recognized as a sensitive species by the California Department of Fish and Wildlife (CDFW) and the U.S. Forest Service. The species is covered under the Pacific Gas and Electric Company (PG&E) Multiple Region Operations and Maintenance Habitat Conservation Plan (MRHCP). A review of the California Natural Diversity Database (CNDDDB) identified 318 records within 1.5 miles of the project area (1977-2023), including 72 positive detections and nine activity centers. The closest known nest is approximately 0.9 miles from Work Areas 49-50. While old-growth forest is absent within the specific work areas, potentially suitable habitat exists within 825 feet of work locations 49-132, 139, 140, 159-201, and 213-220. Thus, NSO could be present in adjacent habitat, and project-generated noise may affect individuals during the breeding season. 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. All work will be conducted in compliance with this permit and the 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 2**) and prohibit the use of herbicides under the project (**Condition of Approval 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, ospreys, and other nesting birds.

Bald eagles

There are two CNDDDB records of this species within 1.5 miles of the work areas (2008 and 2022). Additionally, an unmapped known bald eagle nest has been used in previous years, approximately 0.1 mile west of work area 83. Nests are usually located within one mile of key foraging areas that support a resident population of prey-sized fish. These raptors characteristically choose large conifers in relatively secluded areas away from human disturbance to build nests. The breeding season for this

species typically extends from February through July, with peak nesting activity occurring from March through June. Work areas 21-47 fall within 0.2-0.8 miles of both the 2008 and 2022 occurrences for this species. Additionally, work areas 133-158 fall within one mile of mapped old growth forest in Redwood National Park and are situated between suitable nesting habitat and the foraging grounds of Stone Lagoon and Freshwater Lagoon. With implementation of AMMs and BMPs, and pre-activity surveys conducted at work areas 21-47, 49-152, and 159-221, impacts to this species are not expected to occur (**Condition of Approval 7** and **Condition of Approval 2**).

Aquatic and Amphibious Species

Work areas 109 and 110 are in the streamside management area of Tom Creek, a perennial stream which connects to Big Lagoon. Coastal run cutthroat trout, Coho salmon, Foothill yellow-legged frog, and Northern red-legged frog may be present in this area. The cutting of trees at work areas 109 and 110 shall be felled away from the waterway (Tom Creek) and as much of the trunk of the dead tree shall be left in place, where clearance regulations and safety allow (**Condition of Approval 8**). The implementation of Aquatic and Riparian AMMs and BMPs as detailed in the Biological Constraints Report (**Attachment 2B**) is made a condition of project approval to protect aquatic and amphibious species in the project area (**Condition of Approval 2a**) be adequate to prevent impacts to aquatic and amphibious Species

Land Use and Zoning

The parcels involved in the project are planned and zoned for Commercial Timber, Public Recreation, Agriculture, and Residential Uses. General Plan Designations and Zoning districts of the work areas are listed in **Attachment 1D**. Tree removal on property utilized for residential, agricultural and public use is an allowed accessory use of land. Tree removal on lands planned for Commercial Timber is a principally permitted use. 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. Where the tree removal involves a commercial species and generates a profit, the tree removal would constitute commercial timber production, and a use permit would be required in non TPZ zones. 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 upon completion is not a for-profit operation. If the property owner requests it, the fallen trees will be left onsite.

The parcels for work areas 14-18 and 44-47 fall within the Coastal Transitional Agricultural Land Combining Zone (T). The Humboldt Bay Area Plan of the Humboldt County Local Coastal Program specifies that transitional agriculture lands planned for Agriculture Exclusive (AE) are subject to additional findings of allowable uses. Work areas 14-18 have the (T) combining zone applied, however the underlining zoning for these areas is RA-5 not AE. In addition, the trees to be removed are

Redwoods that are on the inland side of Myrtle Avenue. Based on the type and location of the trees it is unlikely that they are in a transitional agricultural wetland area and thus the consistency finding can be made. Work Areas 44-47 also have the (T) combining Zone applied to the parcels they inhabit and have an underlying zoning of AE. Work areas 44-46 exist outside of the mapped transitional agriculture area. Only work area 47 is in the transitional agriculture (T) mapped area. In this case the trees slated for removal are three Alder located 287 feet away from Rocky Gulch. This zone requires a supplemental finding summarized as follows: There is no less environmentally damaging feasible alternative; the best feasible mitigations are included; and the vegetation removal will result in no significant adverse impacts to habitat values. With the implementation of Multiple Region Operations and Maintenance Habitat Conservation Plan (MRHCP) and associated BMP's these findings can be made based on the project description and project conditions of approval.

Tribal and Cultural Resources:

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.

Access:

Per comments received from the Department of Public Works, Land Use Division on July 3, 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 9-16**). 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 July 3, 2025. No response was received from Caltrans. Any worksites accessed from Highway 101 would require a site-specific encroachment permit for parking and staging 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.15**).

Public Facilities:

Several of the work locations include tree and brush removal within California State Parks. The project was referred to California State Parks on July 3, 2025. No response was received. These parks include

Harry A. Merlo State Recreation Area and Humboldt Lagoons State Park. As discussed in the Design Review and Scenic Resources section above, the tree removals will not have significant negative impacts on the area's viewshed or coastal scenic views, or impact public access to these parks. There would be no significant change to visual resources resulting from the proposed project. The project would result in the removal of 224 trees adjacent to or under electrical transmission 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.

Health and Safety:

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 trees to be cut. The 224 trees to be removed have been deemed incompatible with the safe, reliable operation of the 60 KV transmission 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 July 17, 2025, the Planning Department received referral comments from the California Coastal Commission. Commission staff requested tribal consultation in project area. Tribal Consultation was conducted, the inadvertent discovery protocol has been included in the project conditions of approval, which is consistent with Humboldt County Code 313-16. The Commission asked if the removal of trees would result in a cumulative impact on shade coverage of riparian area. The project calls for the removal of trees along 60 Kv distribution lines. The scattered nature of the removals and the fact that powerlines do not run parallel watercourses limits the likelihood of riparian impacts due to loss of shading. Coastal Commission staff also wondered if we received a referral response from California State Parks. A referral request was sent to California State Parks on July 3, 2025. No response was received.

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

Owners

See Attachment 1C

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>>, if you have any questions about the scheduled item.