

**From:** [Planning Clerk](#)  
**To:** [Whitney, Andrew](#)  
**Cc:** [Johnson, Cliff](#)  
**Subject:** FW: PLN-2025-19170 - PGE  
**Date:** Friday, February 28, 2025 10:28:32 AM  
**Attachments:** [image001.png](#)

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

Laura McClenagan

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**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.
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.
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.
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.
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?
  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.
  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.
  9. LCP 3.40 Visual resource protection, will the proposed project interrupt the visual landscape or coastal view areas?

Thank you,

**Alyssa (Aly) Green**

Wildfire Resilience Analyst

California Coastal Commission

(707) 377-7621

*Preferred Pronouns: (They/Them)*

