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Th8b

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180th day: 8/20/14
Staff: M. Kraemer-A
Staff Report: 2/28/14
Hearing Date: 3/13/14

STAFF REPORT: REGULAR CALENDAR

Application No.: 1-13-012

Applicant: Pacific Gas and Electric Company

Location: Approximately 0.5-mile south of Arcata, on the east side of Highway 101, within the highway right-of-way near the Caltrans Bracut Maintenance Station.

Project Description: Replace 14 conifer trees with approximately 68 Pacific wax myrtle or similar native evergreen shrubs in front of an existing Caltrans maintenance station to partially screen the facility from the highway.

Staff Recommendation: Approval with conditions.

SUMMARY OF STAFF RECOMMENDATION

Commission staff recommends approval of coastal development permit application 1-13-012 subject to the attached recommended special conditions.

Pacific Gas and Electric Company (Applicant) proposes to remove 14 conifer trees within the State Highway 101 right-of-way approximately 0.5-mile south of Arcata in Humboldt County. Areas designated as “Coastal View Areas” under the Humboldt Bay Area Plan are located immediately north and south of the partially developed Bracut area and feature unobstructed views from the highway westward towards Humboldt Bay and eastward towards rural pasture

1-13-012 (Pacific Gas and Electric Company)

lands and forested hillsides. Because of the value of the existing trees in partially screening the Caltrans Maintenance Station from the highway, the Applicant has also proposed to plant approximately 68 Pacific wax myrtle (*Morella californica*) or similar native evergreen shrubs to partially screen the facility from the view of highway travelers. The proposed plantings are expected to grow up to 30 feet tall.

Staff believes that the visual impacts of the tree removal will be mitigated by providing the replacement screening vegetation as proposed. Commission staff recommends [Special Condition 2](#) requiring submittal of a final landscaping plan for the Executive Director's review and approval. Commission staff also recommends [Special Condition 3](#) to protect environmentally sensitive bird nesting habitat and [Special Condition 4](#) to protect archaeological resources.

The motion to adopt the staff recommendation of approval with special conditions is found on page 4.

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APPENDICES

[Appendix A – Substantive File Documents](#)

EXHIBITS

- Exhibit 1 – Regional location map
- Exhibit 2 – Vicinity map
- Exhibit 3 – Site plan for proposed tree removal
- Exhibit 4 – Proposed planting plan
- Exhibit 5 – Tree removal assessment

I. MOTION AND RESOLUTION

The staff recommends that the Commission adopt the following resolution:

Motion:

I move that the Commission approve coastal development permit 1-13-012 pursuant to the staff recommendation.

Staff recommends a **YES** vote on the foregoing motion. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves coastal development permit 1-13-012 and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment:** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration:** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable amount of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation:** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.

4. **Assignment:** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land:** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

This permit is granted subject to the following special conditions:

1. **Demonstration of Adequate Property Rights.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the Applicant shall submit, for the review and written approval of the Executive Director, evidence demonstrating that the owner of the land where the proposed replacement planting activities will occur (California Department of Transportation) grants permission to the Applicant to undertake development on the subject property as conditioned by the Commission.
2. **Protection of Replacement Screening Vegetation.**
 - a. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the Applicant shall submit, for the review and written approval of the Executive Director, a final landscaping plan in substantial conformance with the draft planting drawing submitted with the supplemental application materials received on February 21, 2014 (**Exhibit 4**). The plan shall demonstrate, at a minimum, all of the following: (1) the replacement vegetation shall be planted and maintained in a manner that maximizes the value of the vegetation for screening the Caltrans Bracut Maintenance Station from the view of travelers along Highway 101, (2) approximately sixty-eight (68) Pacific wax myrtle (*Morella californica*) or similar native evergreen shrubs approved by the Executive Director shall be planted on approximately 8-foot centers along the approximately 600-foot-long cyclone fence that faces Highway 101 at the Caltrans Maintenance Station, (3) the planted vegetation shall be allowed to grow up to 30 feet tall or taller, (4) the required vegetation shall be planted no later than May 1st of the first full spring following removal of any existing vegetation along the gas pipeline, (5) all replacement plantings shall be maintained in good condition to ensure maximum screening value, and (6) if any of the replacement plantings die, become decadent, rotten, or weakened by decay or disease, or are removed for any reason, they shall be replaced no later than May 1st of the next spring season in-kind or with another native evergreen species common to the Humboldt Bay area that will grow to a similar or greater height.
 - b. The Permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

3. **Protection of Sensitive Bird Nesting and Roosting Habitats.** The Permittee shall adhere to the following nesting bird protection measures to avoid significant disruption or degradation of environmentally sensitive bird nesting and roosting habitats:
 - a. Tree removal activities conducted during the February 1st-August 31st nesting season shall not commence unless and until a pre-activity bird survey is conducted no more than 14 days prior to the tree removal activity date. The results of the pre-activity bird survey shall be submitted to the Executive Director.
 - b. If an active bird nest or roost is observed in any tree authorized for removal during the required pre-activity bird survey, removal of the occupied tree shall not occur except as provided in subsection (c) hereof, and a qualified biologist shall be contacted.
 - c. A Permittee seeking to commence tree removal activities following discovery of an active bird nest shall not do so until the bird nesting activity is complete, as determined by a qualified biologist. The biologist's written determination shall be provided to the Executive Director prior to commencement of tree removal activities.

4. **Protection of Archaeological Resources.**
 - a. If an area of historic or prehistoric cultural resources or human remains are discovered during the course of the project, all construction shall cease and shall not recommence except as provided in subsection (b) hereof, and a qualified cultural resource specialist shall analyze the significance of the find.
 - b. A Permittee seeking to recommence construction following discovery of the cultural deposits shall submit an archaeological plan for the review and approval of the Executive Director, prepared in consultation with the Tribal Historic Preservation Officers of the Wiyot Tribe, Blue Lake Rancheria, and Bear River Rancheria.
 - i. If the Executive Director approves the Archaeological Plan and determines that the Archaeological Plan's recommended changes to the proposed development or mitigation measures are *de minimis* in nature and scope, construction may recommence after this determination is made by the Executive Director.
 - ii. If the Executive Director approves the Archaeological Plan but determines that the changes therein are not *de minimis*, construction may not recommence until after an amendment to this permit is approved by the Commission.

IV. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares as follows:

A. PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

Pacific Gas and Electric Company (Applicant) proposes to remove 14 conifer trees growing along an approximately 600-foot-long length of gas pipeline #137B right-of-way within the State Highway 101 right-of-way between the highway and the Caltrans Bracut Maintenance Station approximately 0.5-mile south of Arcata in Humboldt County (**Exhibits 1-2**). The Applicant believes that the existing tree roots pose a risk to the integrity of the pipeline, because they could potentially damage the line's outer protective coating and cause corrosion of the pipeline and/or wrap around the gasline and "pull" on it in the event that trees fall. The trees proposed for

removal include seven redwoods (*Sequoia sempervirens*), four nonnative Monterey pines (*Pinus radiata*), two beach pines (*Pinus contorta* ssp. *contorta*), and one Douglas-fir (*Pseudotsuga menziesii* var. *menziesii*), ranging in height from approximately 15 to 60 feet and ranging in diameter at breast height from approximately 10 to 40 inches. The subject segment of the gas pipeline was installed in 1960, and the trees were planted sometime afterward. The Applicant estimates the trees to be around 45 years old.

The trees would be removed manually using chainsaws. A bucket truck with an operator would remove each tree in sections to allow for the safe removal of the tree material. All tree material would be chipped, loaded into a truck, and disposed of off-site. Tree stumps would be ground down to 18 inches below the soil surface.

Because of the visual screening value of the existing trees in partially screening views from the highway to the Caltrans Maintenance Station to the east, the Applicant has also proposed to plant approximately 68 Pacific wax myrtle (*Morella californica*) or similar native evergreen shrubs approximately ten feet east of the gasline right-of-way, where the roots of the shrubs would not affect the gas pipeline, and five feet from the existing cyclone fence on Caltrans property to partially screen the facility from the view of highway travelers. The proposed plantings are expected to grow up to 30 feet tall. Project plans are attached as **Exhibits 3-4**.

The project site is located on the east side of Highway 101 within the roadway corridor. Except where blocked by existing development in the Bracut area immediately east and west of the subject site, there are unobstructed views from this stretch of the highway corridor westward towards Humboldt Bay and eastward towards rural pasture lands and forested hillsides. Areas designated as “Coastal View Areas” under the Humboldt Bay Area Plan are located immediately north and south of the Bracut area.

B. STANDARD OF REVIEW

The proposed project area is bisected by the boundary between the retained CDP jurisdiction of the Commission and the CDP jurisdiction delegated to Humboldt County by the Commission through certification of the County’s LCP. The northernmost two trees proposed for the removal are within the Commission’s retained jurisdiction. The remainder of proposed project area is within the CDP jurisdiction of Humboldt County.

Section 30601.3 of the Coastal Act authorizes the Commission to process a consolidated coastal development permit application when requested by the local government and the applicant and approved by the Executive Director for projects that would otherwise require coastal development permits from both the Commission and from a local government with a certified LCP. In this case, the Humboldt County Board of Supervisors adopted a resolution in 2007 (Resolution No. 07-24), and both the applicant (on January 29, 2014) and the County (on February 14, 2014) wrote letters requesting consolidated processing of the coastal development permit application by the Commission for the subject project, which was approved by the Executive Director.

The policies of Chapter 3 of the Coastal Act provide the legal standard of review for a consolidated coastal development permit application submitted pursuant to Section 30601.3. The local government's certified LCP may be used as guidance.

C. OTHER AGENCY APPROVALS

Caltrans

The Applicant obtained encroachment permit #0112-6LT-0419 from Caltrans on November 6, 2013 for both the proposed tree removal and replacement planting activities. In order to ensure consistency with section 30601.5 of the Coastal Act, [Special Condition 1](#) requires that the Applicant submit to the Executive Director, prior to permit issuance, evidence demonstrating that Caltrans has granted PG&E the authority to comply with all of the conditions of approval required by the Commission.

D. VISUAL RESOURCES

Section 30251 of the Coastal Act states, in applicable part, as follows:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas...

The project area is visible from Highway 101 in a generally scenic corridor between the cities of Arcata and Eureka. As discussed above, except where blocked by existing development immediately east and west of the subject site, there are unobstructed views from this stretch of highway westward towards Humboldt Bay and eastward towards rural pasture lands and forested hillsides. Areas designated as "Coastal View Areas" under the Humboldt Bay Area Plan are located immediately north and south of the Bracut area. The Bracut area itself can be characterized as a visually degraded area, with scattered buildings, warehouses, trailers, parking areas, commercial signs and development, and other visual clutter blocking views from the highway of the bay to the west and of the farmlands to the east.

While the project will not affect views of Humboldt Bay, the tree removal would expose the Caltrans Maintenance Station more prominently to the views of travelers along the public roadway. The facility consists of several buildings, warehouses, paved parking areas, stored trucks and equipment, and truck and equipment washing areas on approximately 3.5 acres. There is an existing cyclone fence along the western edge of the facility between the facility and the highway right-of-way where the trees are located. The existing trees partially obscure views of the fence, buildings, and other development at the Maintenance Station from the highway. Increasing the visibility of the maintenance facility to traveling motorists along this otherwise scenic stretch of highway corridor would further degrade the visual quality of the immediate area.

As proposed, the visual impacts of the tree removal will be mitigated by providing replacement screening vegetation. The Applicant proposes to plant approximately 68 Pacific wax myrtle (*Morella californica*) or similar native, regionally appropriate evergreen shrubs at 8-foot intervals in front of and along the approximately 600-ft. length of the existing cyclone fence. The proposed plantings are expected to grow up to 30 feet tall and provide year-round partial screening of the maintenance yard as viewed from the highway.

To ensure that the Applicant follows through with its commitment to mitigate the visual impacts of the proposed tree removal project by planting the replacement vegetation in a manner that partially screens the Caltrans facility from the view from the highway, the Commission attaches [Special Condition 2](#). This condition requires submittal of a final landscaping plan for the Executive Director's review and approval demonstrating in part that (1) the replacement vegetation shall be planted and maintained in a manner that maximizes the value of the vegetation for screening the Caltrans Maintenance Station from the view of travelers along Highway 101, and (2) all replacement plantings shall be maintained in good condition, and if any of the replacement plantings die, become decadent, rotten, or weakened by decay or disease, or are removed for any reason, they shall be replaced no later than May 1st of the next spring season in-kind or with another native evergreen species common to the Humboldt Bay area that will grow to a similar or greater height.

Therefore, the Commission finds that the proposed project, as conditioned, will protect public views, be visually compatible with the character of the surrounding area, and enhance the visual quality of a visually degraded area, consistent with Section 30251 of the Coastal Act.

E. PROTECTION OF ENVIRONMENTALLY SENSITIVE HABITAT AREAS

Section 30240 of the Coastal Act states as follows:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

Section 30107.5 of the Coastal Act defines "environmentally sensitive area" as:

"...any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments."

The Applicant hired consulting biologists to conduct a tree removal assessment (**Exhibit 5**), which assessed the potential for the project to impact sensitive species or habitats. The assessment concludes the following:

The project area lacks appropriate habitat to support any sensitive species. The trees proposed for removal provide poor nesting/roosting habitat for migratory birds. The trees are visible windswept and immediately adjacent to Hwy. 101 and a maintenance yard, two types of facilities that support heavy human use.

While the assessment concludes the trees provide limited nesting and roosting habitat value for migratory and other bird species, the Applicant nonetheless proposes various measures to minimize the potential to impact environmentally sensitive bird nesting habitat areas. These include conducting a pre-activity bird survey for any tree removal activities proposed to occur during the nesting season (February 1-August 31), not removing any trees with active nests until nesting activity is complete, or September 15, whichever is sooner, and contacting a PG&E biologist to report any active nests that are observed.

To ensure that the proposed tree removal work does not result in significant disruption or degradation of occupied nesting habitat consistent with the requirements of Section 30240 of the Coastal Act, the Commission attaches [Special Condition 3](#). This condition requires adherence to the proposed measures, as modified by the special condition, to ensure that the project as conditioned will not result in significant disruption or degradation of ESHA consistent with Section 30240 of the Coastal Act.

F. PROTECTION OF ARCHAEOLOGICAL RESOURCES

Section 30244 of the Coastal Act states as follows:

Where development would adversely impact archeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

The project area is located within the traditional territory of the Wiki division of the Wiyot Tribe. The tribe is understood to have been composed of three tribal divisions (Patawat, Wiki, and Wiyot), each associated with a water-related resource (the Mad River, Humboldt Bay, and the lower Eel River, respectively) and each speaking a common language (Selateluk). Settlements existed all around Humboldt Bay and along the banks of many of the streams and sloughs in this area.

The Applicant contacted the Tribal Historic Preservation Officers (THPOs) for the Blue Lake Rancheria, Bear River Rancheria, and Wiyot Tribe regarding the proposed project on January 13, 2014. All three THPOs responded that, due to past disturbance in the project area associated with construction of the highway and the Caltrans maintenance yard, they did not have any specific concerns with proposed activities. The THPOs recommended that they be contacted in the event that ground disturbance associated with the proposed planting inadvertently unearths previously undiscovered archaeological resources. Consistent with the recommendation, to ensure protection of any archaeological resources that may be discovered at the site during excavation for the proposed new residence consistent with Section 30244, the Commission requires [Special Condition 4](#). This condition directs that if an area of archaeological deposits is discovered during the course of the authorized development, all ground-disturbing activities must cease, and the THPOs must be contacted. To recommence construction following discovery of cultural

deposits, the applicant is required to submit a supplementary archaeological plan for the review and approval of the Executive Director, prepared in consultation with appropriate tribal representatives, to determine whether the changes are *de minimis* in nature and scope, or whether an amendment to this permit is required.

Thus, the Commission finds that the proposed development, as conditioned, is consistent with Coastal Act Section 30244, as the development will include mitigation measures to ensure that the development will not adversely impact archaeological resources.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 13906 of the Commission's administrative regulation requires Coastal Commission approval of coastal development permit applications to be supported by a finding showing the application, as modified by any conditions of approval, is consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are any feasible alternatives or feasible mitigation measures available, which would substantially lessen any significant adverse effect the proposed development may have on the environment.

The Commission incorporates its findings on Coastal Act consistency at this point as if set forth in full. As discussed above, the proposed project has been conditioned to be consistent with the policies of the Coastal Act to the maximum extent feasible consistent with Section 30010 of the Coastal Act. The findings address and respond to all public comments regarding potential significant adverse environmental effects of the project that were received prior to preparation of the staff report. As specifically discussed in these above findings, which are hereby incorporated by reference, mitigation measures that will minimize or avoid all significant adverse environmental impacts to the extent feasible have been required. As conditioned, there are no other feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impacts consistent with the requirements of Section 30010. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, can be found consistent with the requirements of the Coastal Act to conform to CEQA.

1-13-012 (Pacific Gas and Electric Company)

APPENDIX A
SUBSTANTIVE FILE DOCUMENTS

1. Application file for CDP 1-13-012 (PG&E)
2. County of Humboldt Local Coastal Program

A B C D E F G H I J K L M N O

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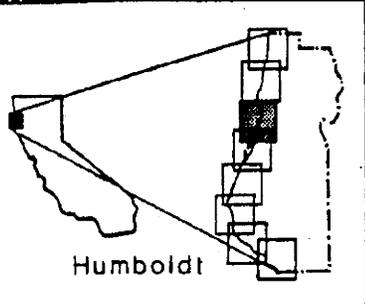
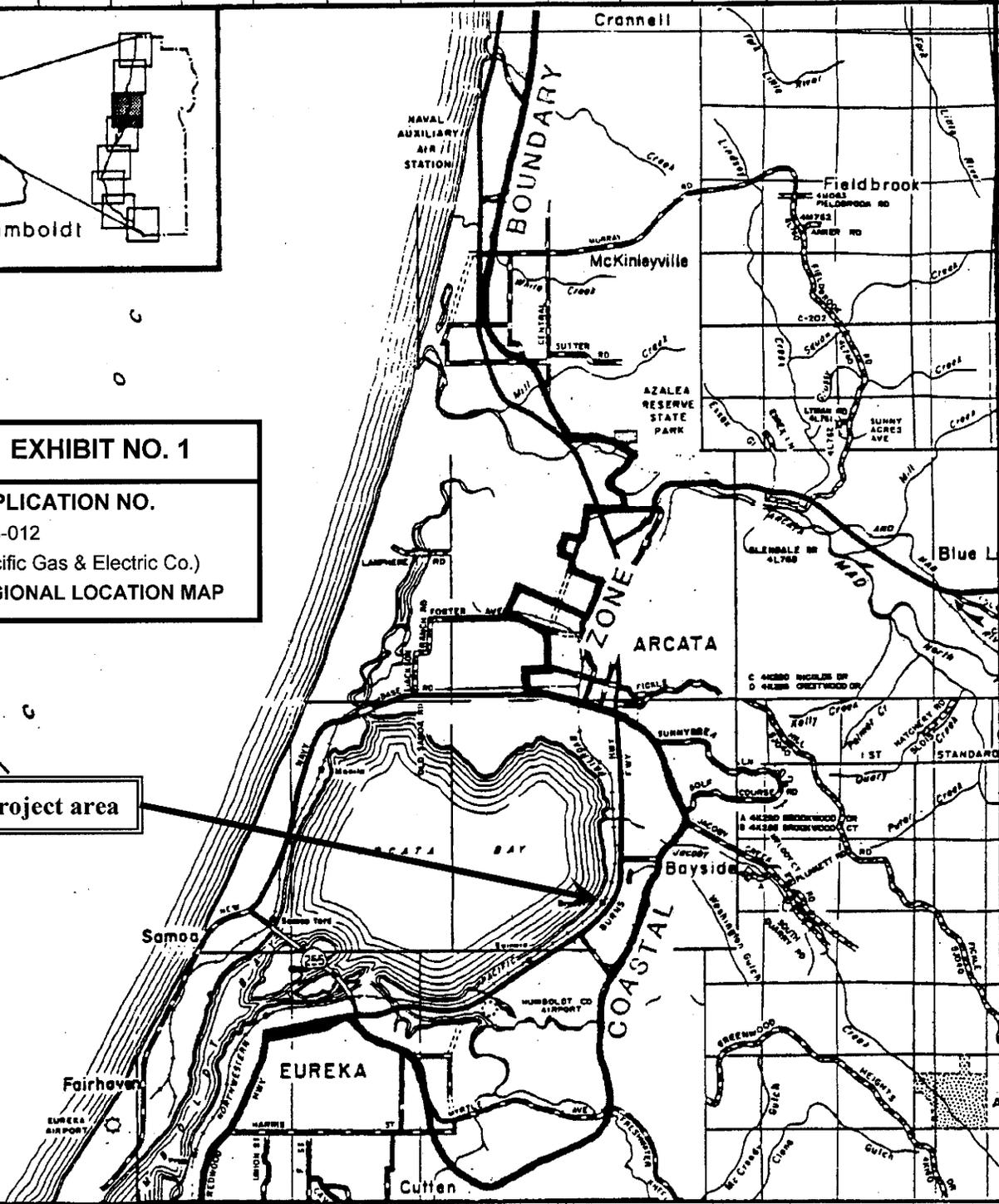


EXHIBIT NO. 1
APPLICATION NO.
1-13-012
(Pacific Gas & Electric Co.)
REGIONAL LOCATION MAP

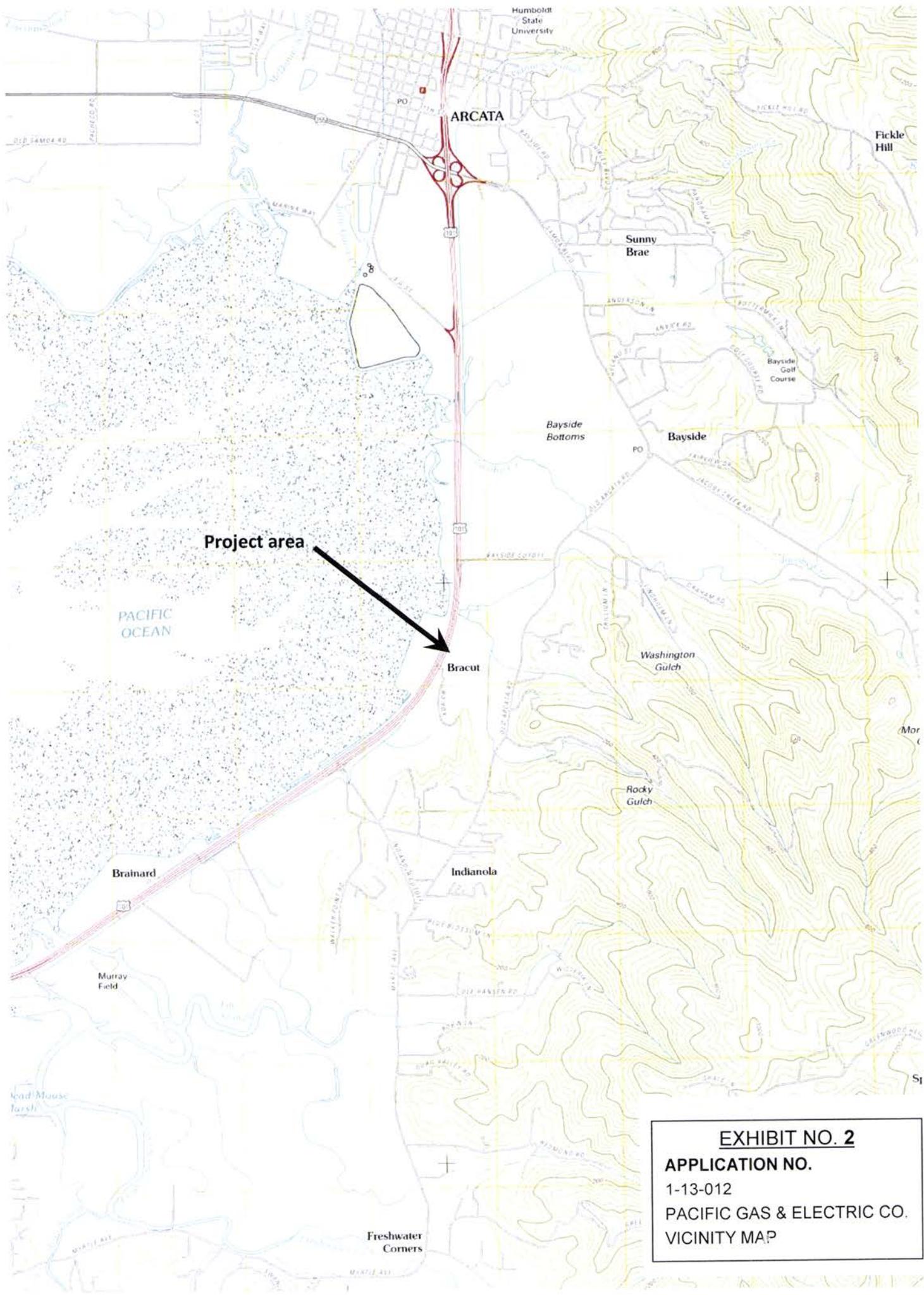
Project area



LOCATION MAP



County of Humboldt



Project area

EXHIBIT NO. 2
APPLICATION NO.
1-13-012
PACIFIC GAS & ELECTRIC CO.
VICINITY MAP

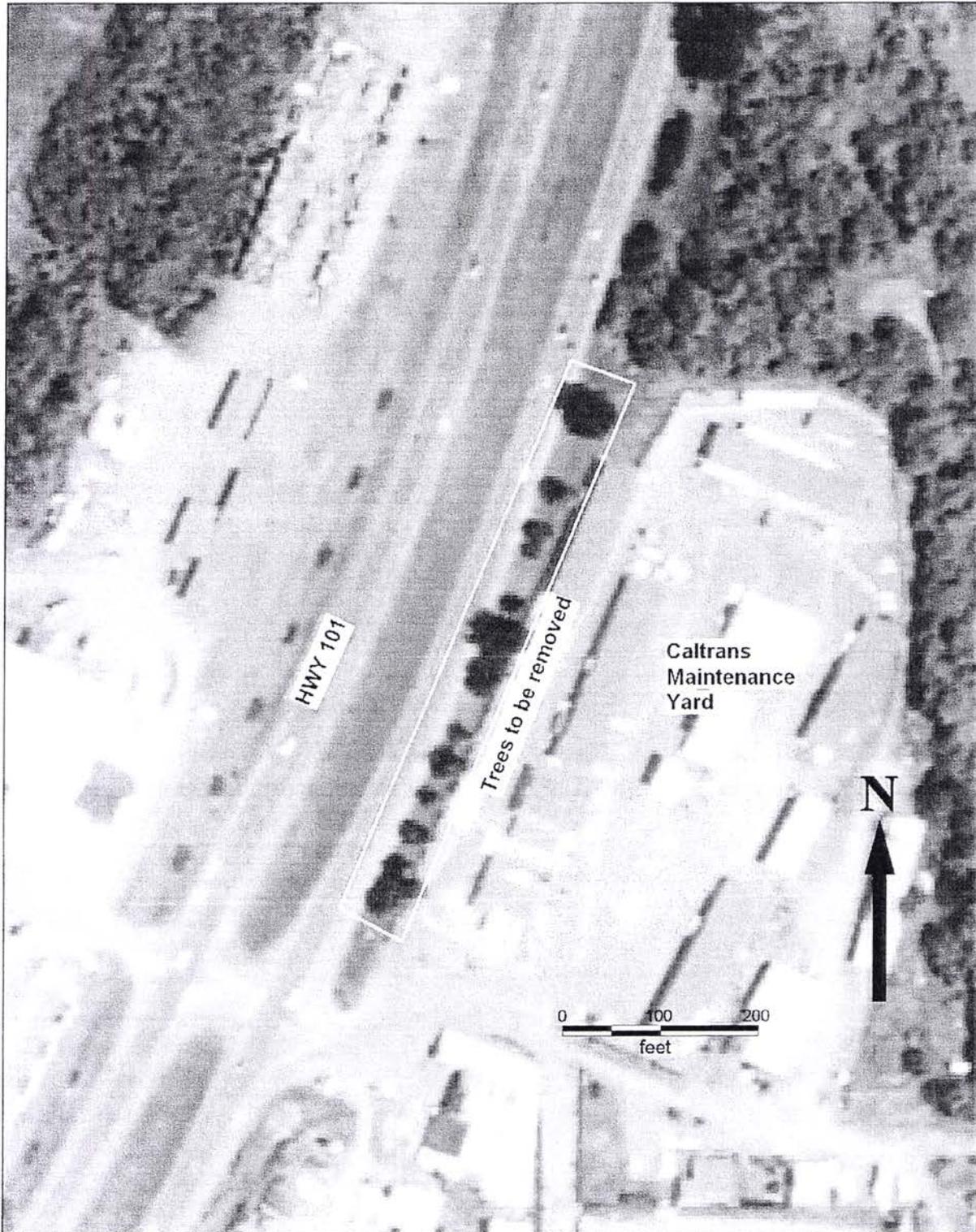


Figure 3. Aerial view of project showing tree location, spacing and adjacent habitat features.

Caltrans Bracut Yard
Year 2000-2001 topo overlaid on Caltrans aerial photo
1"=60' on 11x17 pdf plot with no scaling
red circles = photo orientation points
Dimensions shown are fence to RAV at 100' intervals. Note the unexplained difference between the photo and the topo at the northerly three dimension locations
RAV solution by Bob Knuth - Caltrans
map by CRJ 4-25-13
ref 33030 Calce = "Bracut"
ref Bracut.feet.no datum.dgn

Notes

- * Approximately 68 Pacific Wax Myrtle bushes (or equivalent Native Evergreen) shall be planted at 8 foot intervals, within 5 feet of and west of the existing Cyclone Fence.
- * Planting locations shall be placed no closer than 5 feet from AT&T's existing Fiber Optic Underground Line.

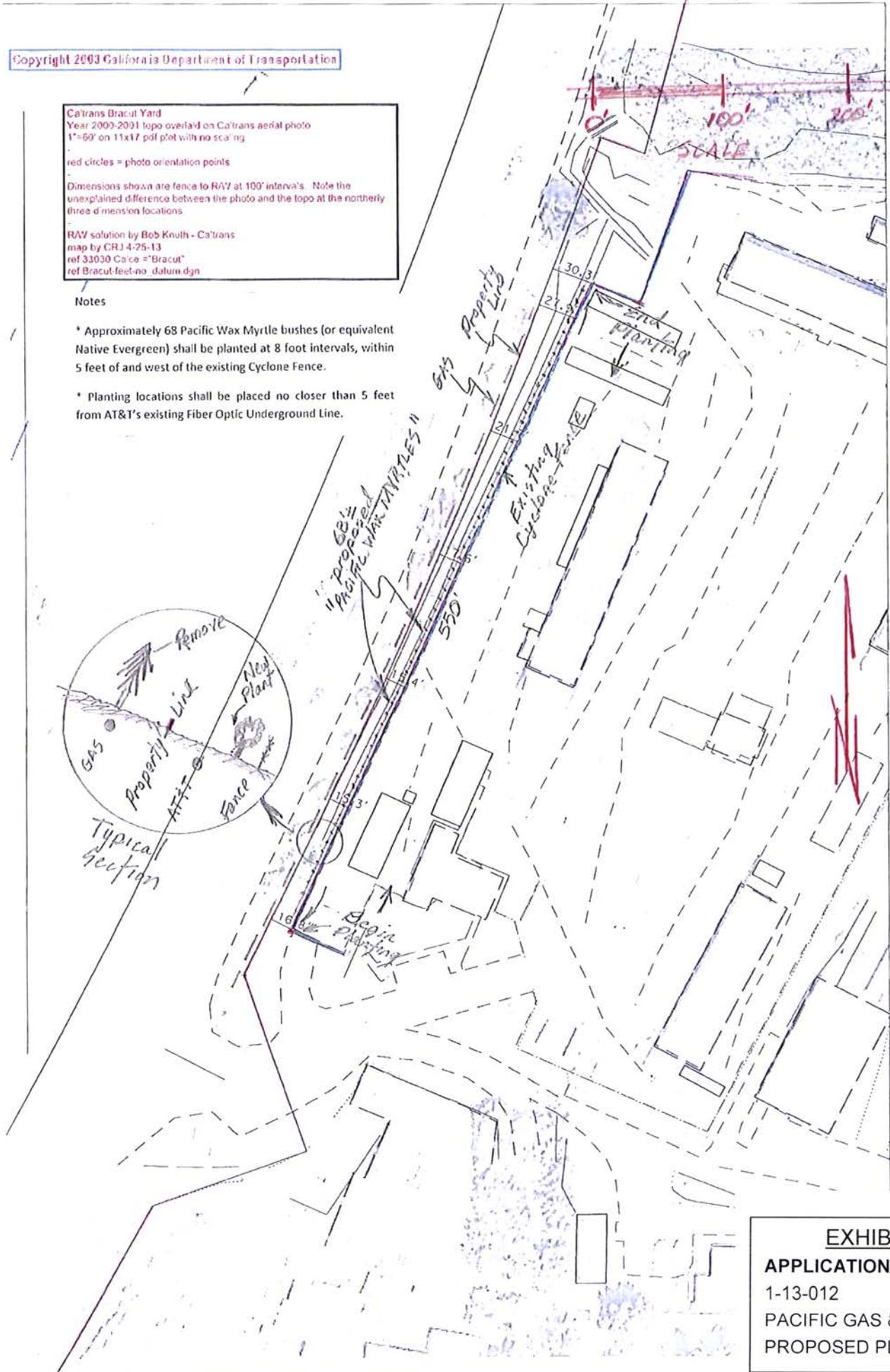
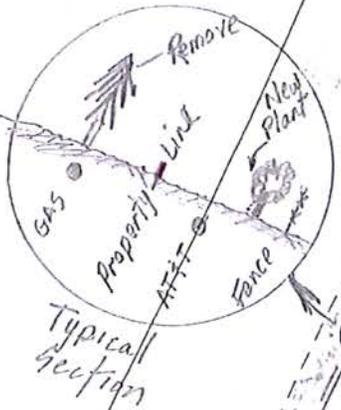


EXHIBIT NO. 4
APPLICATION NO.
1-13-012
PACIFIC GAS & ELECTRIC CO.
PROPOSED PLANTING PLAN

EXHIBIT NO. 5

APPLICATION NO. 1-13-012
PACIFIC GAS & ELECTRIC CO.
TREE REMOVAL
ASSESSMENT (1 of 13)

March 27, 2012

Dan McCall
Pacific Gas & Electric Company
3600 Meadowview Drive
Redding, CA 96002

Re: Humboldt County, PG&E Gas Line 137B at Bracut, Tree Removal Assessment

Per your request Natural Resources Management Corporation (NRM) completed an assessment of Pacific Gas and Electric Company's (PG&E) gas line 137B proposed tree removal project. The section of gas line assessed was located south of the Bayside Cutoff and immediately in front of a Cal Trans maintenance yard located on the east side of Hwy. 101 (Figures 1 and 2). The evaluation was conducted to facilitate the permitting process with the California Coastal Commission (Local Jurisdiction; Figure 2) for the removal of fourteen mature conifer trees. Thirteen trees were identified growing directly over the gas line while one was offset five feet.

The trees are proposed for removal because they pose a risk and have the potential to affect the reliability of the gas line. Trees and their root system may impact gas lines in various ways by; 1) damaging the gas line's outer protective coating, which may lead to corrosion and 2) getting wrapped around a gas line and "pulling" on the structure should the tree(s) fall.

An initial assessment of this segment of gas line occurred during the period of June 10th to 21st 2011. An additional site visit was conducted February 23, 2012. Surveys were performed by NRM's staff biologist Jason Meyer and staff botanist Prairie Moore. Prior to field surveys aerial imagery and California Natural Diversity Database (CNDDDB) records were reviewed. Consultations with PG&E staff responsible for ROW maintenance were conducted. Of concern were the potential impacts to sensitive species and habitats resulting from the proposed tree removal.

Scope of Work

As part of NRM's initial assessment the presence of the above mentioned trees within the gas line right-of-way (ROW) was noted. To determine the exact location of the gas line in relationship to the trees, PG&E conducted a detailed pipeline survey. The survey determined that thirteen of the fourteen trees were located directly over the gas line (Table 1). The gas line location was marked with yellow paint and yellow wire flags.

Table 1. Trees proposed for removal from PG&E's gas line 137B ROW. Trees listed north to south.

#	Species	DBH (in)	Height (ft)
1	Monterey Pine	36	50
2	Redwood	28	50
3	Beach Pine	12	20
4	Beach Pine	10	15
5	Monterey Pine	12	30
6	Monterey Pine	28	60
7	Monterey Pine	22	35
8	Redwood	20	35
9	Redwood	32	65
10	Redwood	20	50
11	Redwood	24	55
12	Redwood	30	35
13	Redwood	40	50
14	Douglas fir	28	60

The scope of work will involve the complete removal of the fourteen designated trees and the grinding of their stumps. Trees to be removed will be clearly marked prior to start of operations. Trees will be felled, the stumps cut flush to the ground, and then grinded to 12"-18" below the soil surface. The majority of tree material will be chipped on site and directly loaded into chip trucks; larger material will be loaded into dump trucks. All material will be hauled off site and disposed of properly. An encroachment permit will be obtained from Caltrans prior to work starting and will specify required operating procedures and traffic control consistent with the location adjacent to Hwy. 101. Tree removal will take approximately 5-7 days to complete.

Sensitive Environmental Resources

This segment of gas line 137B, located between Arcata and Eureka, parallels the east side of Hwy. 101 and begins at the access to the Caltrans Maintenance facility and continues north towards Bayside Cutoff; a linear distance of approximately 600 feet (Figures 1, 2 and 3; Appendix: Photos 1-7).

North of the Bracut exit, between Hwy. 101 and the Caltrans facility is mowed grass approximately thirty to forty feet wide with the described trees growing in a row over the gas line. This 600 foot section of ROW lacks a woody shrub layer, therefore only mature trees are proposed for removal.

The herb layer is dominated by grasses and is regularly mowed. The tree layer contains redwood (*Sequoia sempervirens*), beach pine (*Pinus contorta*), Monterey pine (*Pinus radiata*) and Douglas fir (*Pseudotsuga menziesii*). These trees were likely planted to provide a screen for the Caltrans facility. The trees were visibly windswept and had some dead tops. These trees are native to this region of California, with the exception of Monterey Pine that is considered an invasive species to the coastal region of Humboldt County. The redwood,

Douglas fir, and beach pine are not rare or sensitive. These trees are not likely to have naturally occurred at this site, which is filled and diked former tidelands.

There are no wetlands within the project area, however there is wetland habitat to the north.

The project area lacks appropriate habitat to support special status species. The trees provide poor nesting/roosting habitat for migratory bird species. The trees are visibly windswept and immediately adjacent to Hwy. 101 and a maintenance yard; two types of facilities that support heavy human use.

The trees provide some visual screening of the Caltrans site (Appendix; Photos 1-7), but screening is minimal. Other developed sites (car dealers and) along the Hwy. 101 corridor lack vegetative screening, so it would not be out of place for this Caltrans facility to lack visual screening as well.

Resource Protection Measures

To ensure complete impact avoidance to sensitive natural resources (wetland habitat located north of the project area), the following resource protection measures will be followed:

1. Refueling of equipment will occur 200' or more away from wetland or riparian habitats. (Applicable on the north end of the project area.)
2. Adhere to Caltrans encroachment permit conditions.
3. To ensure tree removal does not impact bird nesting activity, tree removal will occur after the bird nesting season; between September 15 and December 31, 2013.

Humboldt County, Gas Line 137B at Bracut, Tree Removal Assessment

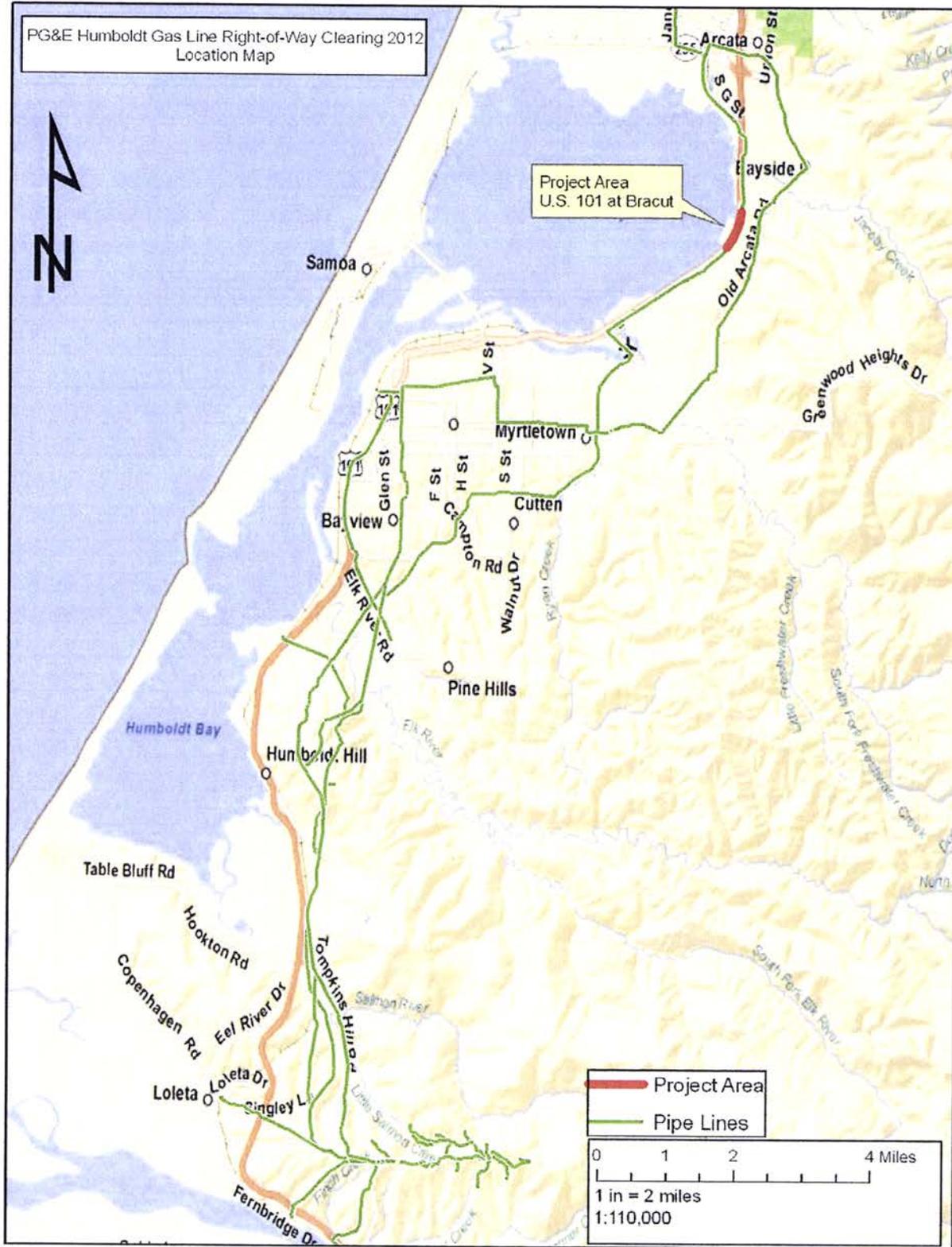


Figure 1. General Location Map

4013

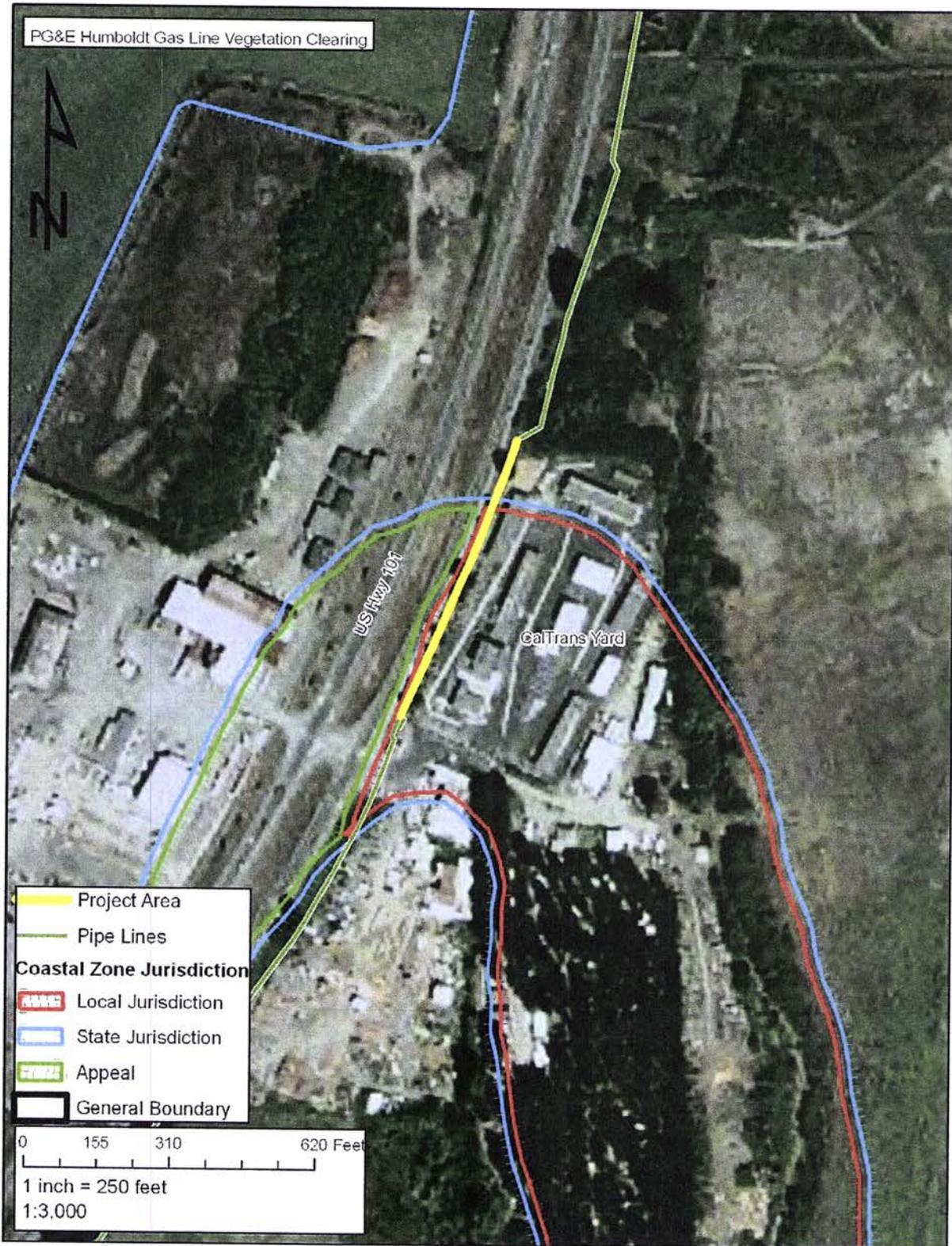


Figure 2. Location Map displaying Coastal Zone jurisdictions.

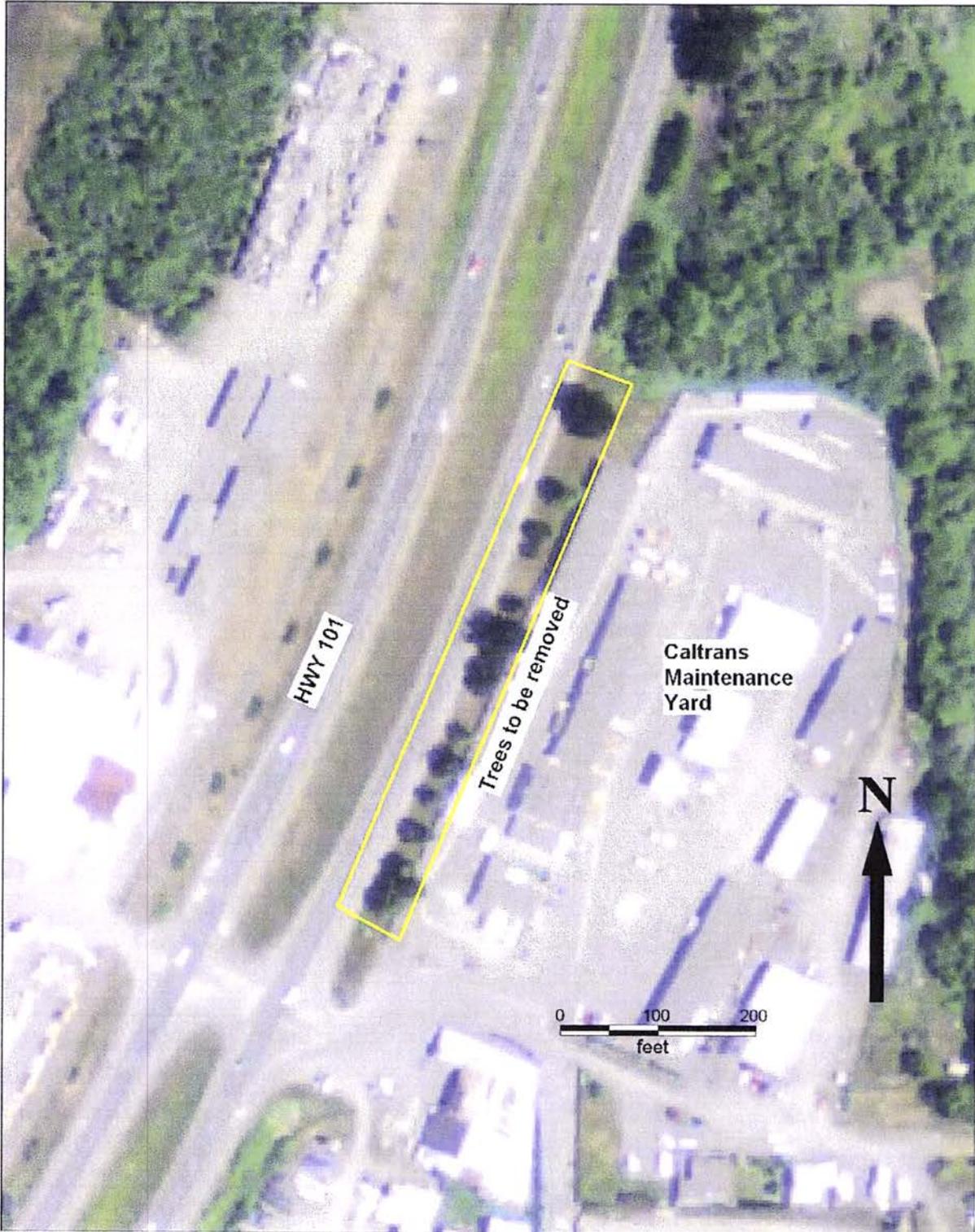


Figure 3. Aerial view of project showing tree location, spacing and adjacent habitat features.

**Pacific Gas and Electric
Humboldt County Coastal Zone
Gas Line Right of Way Assessment 2012**

Appendix A – Segment Photographs



Photo 1 – South end of project site on US Highway 101. Caltrans Maintenance yard is visible on right.



Photo 2 – The area under the trees is regularly mowed and maintained.



Photo 3 – The location of the gas line is flagged, demonstrating its location directly beneath the trees. The Caltrans facility is behind the fence on the right.



Photo 4 – Northern most tree within the proposed project area. Riparian marsh area behind the tree to the north is outside the extent of this project.

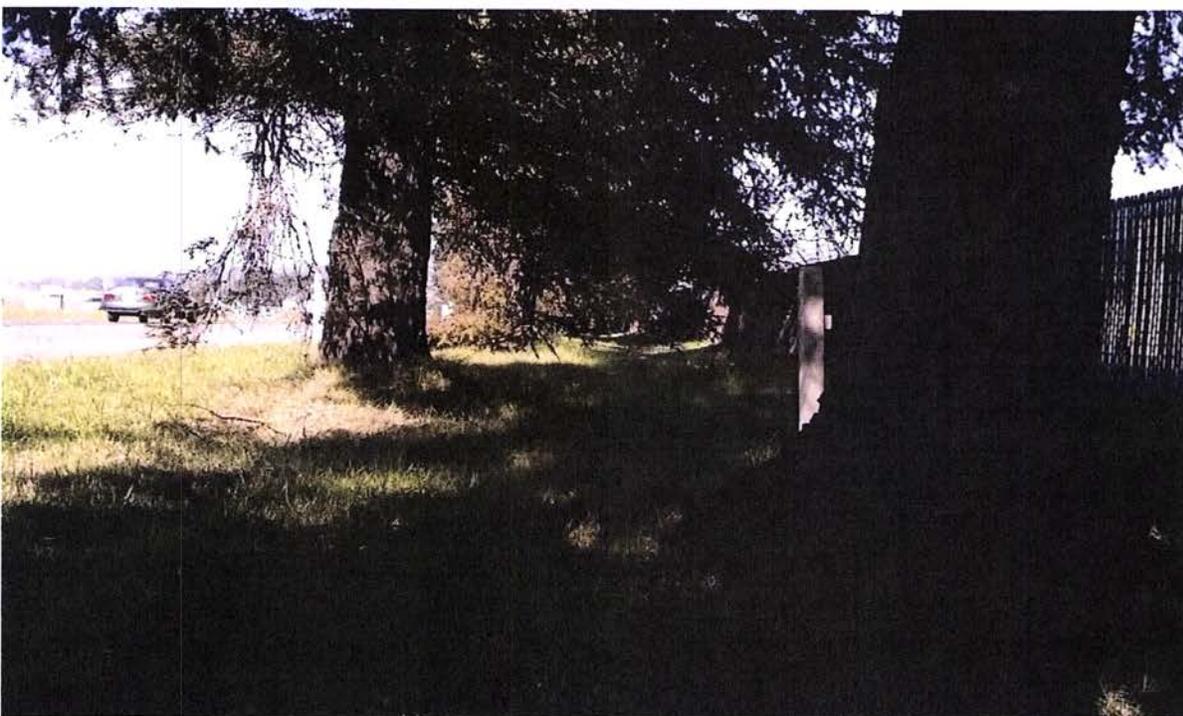


Photo 5 - Photo demonstrating lack of shrub layer.



Photo 6 – The tree row provides only minimal screening of the Caltrans facility. This photo taken from across Highway 101.



Photo 7 - The tree row provides only minimal screening of the Caltrans facility. This photo taken from across Highway 101.



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