

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE (415) 904-5200
FAX (415) 904-5400
TDD (415) 597-5885



Th11a

July 10, 2017

To: Coastal Commissioners and Interested Persons

From: Alison Dettmer, Deputy Director
Joseph Street, Senior Environmental Scientist

Subject: **Addendum to 9-17-0408 – Pacific Gas & Electric (PG&E)**

This addendum provides revisions and a number of minor edits and corrections to the staff report. These revisions do not change staff's recommendation that the Commission conditionally **approve** the coastal development permit.

On June 28 and 29, 2017, staff received comments submitted by Janet Eidsness, Tribal Heritage Preservation Officer for the Blue Lake Rancheria, and Tom Torma, Cultural Director for the Wiyot Tribe, recommending the inclusion of a special condition requiring implementation of an inadvertent archaeological discovery protocol and archaeological resources training for project field contractors in order to protect Wiyot cultural resources with potential to occur at project sites (see attached **Correspondence**). **Special Condition 10** included submittal of an inadvertent archaeological discovery protocol for the Executive Director's review and approval, but did not require worker training. As described below, staff recommends that a requirement for pre-project archaeological resources training be added to **Special Condition 10**.

On July 2 and 3, 2017, staff received comments from the applicant, PG&E, requesting several changes to the staff recommendation and providing several corrections to the description of the proposed vegetation removal activities (see attached **Correspondence**). In particular, PG&E requested the following significant modifications: (1) Inclusion of a specified period of review for all special conditions involving the Executive Director's review and approval of submitted plans or other materials; (2) Removal of the requirement that the Executive Director review and approve the sensitive species Survey Plan included in **Special Condition 4**; (3) Modification of **Special Condition 6** (Protection of Breeding and Nesting Birds) to allow for the use of an existing PG&E Nesting Bird Management Plan that includes species-specific buffers. In

response to these comments, staff recommends a number of revisions to the staff report, as summarized below.

Proposed Revisions to the Staff Report

The proposed revisions below are recommended findings and will be incorporated into relevant portions of the staff report as adopted findings. Additions are shown below in **bold underline** and deletions in ~~strike through~~.

Summary, Page 2, paragraph 2:

... In total, the project would result in the clearing of ~~4.15~~ **1.24** acres of riparian vegetation and 0.055 acres of wetland vegetation in ESHA, as well as the removal of ~~83~~ **107** riparian trees and ~~149~~ **159** large conifers ...

... **Special Conditions 3, 4, 6, and 11** require pre-~~construction~~ **project** surveys to identify sensitive plants and animals ...

... **Special Condition 5** requires biological monitoring to prevent impacts to sensitive species during ~~construction~~ **project** activities.

Page 4, 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 SCE **the Permittee** or authorized agent ...

...

5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and SCE **the Permittee** to bind all future owners ...

Page 5, Special Condition 2:

2. Project Biologist – Qualifications and Responsibilities. PRIOR TO THE COMMENCEMENT OF PROJECT ACTIVITIES, the Permittee shall appoint one or more Biologists to implement mitigation measures of the approved project. **The appointments shall be submitted to the Executive Director for review and approval; the Executive Director shall conduct this review of qualifications within 30-days of submittal.** The Biologist(s) ~~are to be approved by the Executive Director~~ and must meet the following minimum qualifications ...

Page 5, Special Condition 3:

(1) *Project Limits* ... Project limit boundaries shall be shown on all project maps and drawings and clearly marked in the field prior to project activities, and work outside these limits shall be avoided during ~~construction~~ **project activities**.

Pages 6-7, Special Condition 4:

4. ~~Pre-Construction~~ Project Biological Surveys & Sensitive Species Protection.

...

B. PRIOR TO THE COMMENCEMENT OF THE SURVEYS, the Permittee shall submit, for the Executive Director's review and approval, a Survey Plan ... **The Executive Director shall complete the required review within 30 days.**

C. If sensitive species are determined to be present at a site, the Permittee shall implement the following requirements:

...

(2) ... If the required vegetation removal does not allow for a 25-foot buffer, the maximum possible buffer shall be used, along with the implementation of additional protective measures, such as the ~~erection~~ **placement** of fencing ~~or~~, barriers **or stakes** between the sensitive plant species and project work areas, **as necessary to protect the sensitive plant(s).**

...

(4) At work project sites where sensitive wildlife species are identified as present in the project area, the Permittee shall use appropriate barriers to movement (e.g., construction fencing or barricades) or setbacks to minimize wildlife movement into active ~~construction~~ **project** areas.

Page 7, Special Condition 6:

~~6. **Protection of Breeding and Nesting Birds.** All project activities shall occur outside of the bird breeding season (February 15 through August 31) to the maximum extent feasible. If project activities between February 15 and August 31 cannot be avoided, within one week of the commencement of any new project activity, the Project Biologist(s) shall conduct nesting surveys at all sites where such activities would occur, and within a 500-foot radius of these sites. If breeding is observed or active nests located, no project activities or other disturbance shall occur within 300 feet (500 feet for raptors) of the breeding habitat or nests until any young birds have fledged and left the area.~~

6. Final Nesting Bird Protection Program.

A. PRIOR TO COMMENCEMENT OF ANY VEGETATION MAINTENANCE ACTIVITIES BETWEEN FEBRUARY 15 AND AUGUST 31, the Permittee shall submit, for the 30-day review and approval of the Executive Director, a final Nesting Bird Protection Program (Program), prepared by a qualified biologist, for conducting seasonal surveys for bird nesting at project sites, and

protecting such habitat from project impacts. The Program shall provide, at a minimum, for the following:

- (1) Surveys for the presence of active nesting at all sites where vegetation maintenance would occur during the nesting season (February 15 through August 31), and within the surrounding area out to a distance corresponding to the largest species-specific buffer identified under (3), below. Surveys shall be conducted by the qualified Biologist(s) identified under Special Condition 2 (above), and completed within two weeks of the commencement of vegetation maintenance activities at a given site.**
- (2) Avoidance (no removal) of any tree or shrub supporting active bird nesting until after the end of the breeding season, or fledging has occurred.**
- (3) Establishment of species-specific buffers around active nests or breeding areas, within which no project activities or other disturbance shall occur until any young birds have fledged and left the area. The size of the buffer(s) shall be provided for in the Program, and determined based on the best available information (i.e., scientific literature, CDFW and/or USFWS guidance, and expert opinion) on the needs and sensitivity of each species with potential to occur in the project areas. If pre-project surveys identify a nesting bird species for which no buffer has been provided for in the Program, a default exclusion area of 300 feet (500 feet for raptors) from the active nest or breeding area shall be established.**

The Project Biologist(s) shall be present on site during all vegetation maintenance activities to (a) enforce the protective buffers, and (b) monitor active nests and breeding birds for signs of distress or abnormal behavior. If signs of distress or disturbance are observed, the Biologist(s) shall have discretion to enlarge the buffers, halt project activities, or implement other measures necessary to protect active nests and breeding.

- B. The Permittee shall undertake development in accordance with the approved final Nesting Bird Protection Program. Any proposed changes to the approved Program shall be reported to the Executive Director. No changes to the approved final Program shall occur without an amendment to Coastal Development Permit No. 9-17-0408, unless the Executive Director determines that no amendment is legally required.**

Page 7-8, Special Condition 7:

- 7. Habitat Mitigation Plan.** PRIOR TO THE COMMENCEMENT OF PROJECT ACTIVITIES, the Permittee shall submit to the Executive Director for review and approval a Habitat Mitigation Plan ... **The Executive Director shall complete the required review within 30 days.**

- A. Restoration Requirements:** The Mitigation Plan shall provide for the following:

- (1) Restoration of at least ~~3.45~~ **3.7** acres of riparian woodland or scrub habitat, including a minimum of ~~249~~ **321** native riparian trees, to compensate for ~~the clearing of~~ the clearing of ~~1.15~~ **1.24** acres of these habitats and removal of ~~83~~ **107** trees under the proposed project ...

Page 9, Special Condition 9:

9. **Spill Prevention and Response Plan.** PRIOR TO THE COMMENCEMENT OF PROJECT ACTIVITIES, the Permittee shall submit a project-specific Spill Prevention and Response Plan to the Executive Director for review and approval. **The Executive Director shall complete the required review within 30 days.** ...

Page 9, Special Condition 10:

10. **Protection of Archeological Resources.** **The Permittee shall conduct a pre-project training program to educate field personnel about the potential for the inadvertent discovery of cultural and archaeological resources at the project sites, and to familiarize workers with the proposed protection measures summarized in Exhibit 3.** If an area of cultural deposits or human remains is discovered during the course of the project, all ~~construction~~ **project activities** shall cease ...

Page 10, paragraph 3, lines 3-6:

... In aggregate, the project would result in the removal of ~~83~~ **107** riparian trees, ~~149~~ **163** large ~~conifer~~ **upland** trees ... and approximately ~~58,000~~ **62,000** square feet (~~1.33~~ **1.42** acres) of brush and shrubs.

Page 10, paragraph 4, line 14:

... These measures are described in **Exhibit 3.** **PG&E is also providing funding for new tree planting to the City of Arcata to mitigate for the removal of trees at project sites within city limits. PG&E states that during the winter of 2017, 111 trees and shrubs were planted at various locations.**

Pages 11-14, Table 1 (next page):

Table 1: Gas pipeline right-of-way vegetation maintenance activities proposed under CDP Application No. 9-17-0408

<i>Site #</i>	<i>Location</i>	<i>Proposed Tree Removal*</i>	<i>Proposed Brush Removal</i> (vegetation type)	<i>Existing Conditions / Environmental Setting</i>
RW-V-11472-14	Jane’s Rd. at Bay School Rd., Arcata (franchise area, County ROW)	none	720 sq. ft. (C) blackberry (freshwater wetland)	370-ft long roadside strip dominated by California (C) blackberry (<i>Rubus ursinus</i>); contains a wetland swale and other native and non-native wetland indicator species.
RW-V-5744-16 (south segment)	South of Ariel Way at Lorelei Ln., Arcata APN: 505-351-022	7 large, 1 small redwood	none	Remnant upland forest and ruderal vegetation along a residential fenceline; within 350 feet of McDaniel Slough.
RW-V-2729-15	South G St, Arcata (franchise area, City ROW)	1 <u>small</u> willow 2 <u>small</u> acacia (exotic)	none	1,230-ft long roadside strip containing unnamed creek/drainage; supports riparian and wetland vegetation, mapped as freshwater and estuarine wetland; within 400 feet of Arcata Bay
RW-V-2732-15	Hwy. 101 north of Jacoby Creek, Arcata APN: 501-042-005	none	180 sq. ft. (H) blackberry (freshwater & estuarine wetland)	Within the banks of an unnamed tributary to Jacoby Creek; mapped seasonal wetland dominated by non-native Himalayan (H) blackberry (<i>Rubus armeniacus</i>). Contains suitable habitat for several special status plants and aquatic wildlife species.
RW-V-2733-15	Hwy. 101 at Jacoby Creek, Arcata APN: 501-042-005	5 small willow 1 large alder 2 small alder 1 small other	none 3960 sq. ft. (H) blackberry & misc (riparian)	Mature riparian woodland dominated by red alder (<i>Alnus rubra</i>) and willow (<i>Salix</i> spp.), within the banks and floodplain of Jacoby Creek; mapped seasonal wetland; Contains suitable habitat for several special status plants and aquatic wildlife species.
RW-V-11464-14	Hwy. 101 south of Brainard APNs: 501-261-039, 501- 261-045	2 small alder 6 large Monterey pine	2268 sq. ft. non-native brush (riparian/wetland)	1,600-ft long roadside strip within and adjacent to a mapped seasonal/farmed wetland; contains native and non-native riparian and upland vegetation; contains an unnamed perennial watercourse supporting emergent freshwater wetland vegetation. Contains suitable habitat for special status plants, wildlife and fish species.
RW-V-2568-16	Old Arcata Rd. north of Indianola APNs: 501-181-001, 501-261-013, -014	1 large, 37 small alder 8 <u>small</u> willow 23 24 small Sitka spruce	39, 276 168 sq. ft. (0.9 ac) (riparian woodland)	2,250-ft long roadside strip within mature riparian forest dominated by red alder (<i>Alnus rubra</i>), with native and non-native blackberry and willow understory. Site runs parallel to (w/in ~12 ft) of an unnamed tributary to Rocky Gulch which contains suitable habitat for coast cutthroat trout and critical habitat for tidewater goby.

* “Large” tree = diameter at breast height (dbh) is 12 inches or greater; “small” = dbh is less than 12 inches.

Table 1 (continued): Gas pipeline right-of-way vegetation maintenance activities proposed under CDP Application No. 9-17-0408

<i>Site #</i>	<i>Location</i>	<i>Proposed Tree Removal*</i>	<i>Proposed Brush Removal</i> (vegetation type)	<i>Existing Conditions /Environmental Setting</i>
RW-V-11458-14	Myrtle Ave. at Tower Dr., Myrtle town APNs: 402-301-012, -024	1 large Sitka spruce 1 large redwood	none	1,420-ft roadside strip containing upland forest trees and ruderal vegetation; within area mapped as farmed wetland by Humboldt County; within 200 feet of Freshwater Creek.
RW-V-2559-16 (west segment)	Myrtle Ave. at Mitchell Rd., Myrtle town APNs: 017-152-009, 017-161-017	7 <u>5</u> large, <u>2</u> small willow 2 large, <u>4</u> small redwood 2 large, <u>3</u> small Sitka spruce 1 large western hemlock 1 large unknown	720 sq. ft. willow 720 sq. ft. blackberry (riparian)	Approximately 250-ft long strip of remnant mixed riparian/upland forest at the edge of a residential property. Forest canopy made up of willow (<i>Salix</i> spp.) and upland trees; understory of willow and blackberry. Adjacent to an ephemeral roadside ditch. Contains marginal habitat for special status alpine marsh violet (<i>Viola palustris</i>) and Townsend’s big-eared bat (<i>Corynorhinus townsendii</i>).
RW-V-1152-16	Oakridge Ter. and Myrtle Ave. Myrtle town APNs: 016-171-004, 017-151-007	5 large, <u>1</u> small redwood 1 large, <u>4</u> small grand fir 5 small	108 sq. ft. (H) blackberry (riparian) 1224 sq. ft. (upland)	Lower portion of site consists of wetlands and riparian scrub dominated by Himalayan blackberry, on the banks of Ryan Slough. Slough is designated critical habitat for Chinook salmon and steelhead and suitable habitat for several special status fish species. Streambank contains suitable habitat for special status plant species. Upland portion of the site consists of remnant upland forest (grand fir, redwood) with huckleberry and upland brush understory.
RW-V-9599-15	South of Pennsylvania Ave., Myrtle town APNs: 016-071-014, 016-171-004, 016-172-001, -007, -008	54 large redwood 3 large Sitka spruce 3 large Douglas fir 8 small conifers 1 small oak	540 sq. ft. (upland forest understory brush)	Site consists of a large remnant patch of redwood-dominant conifer forest. Tree removal would include several large redwoods in excess of 50 inches dbh, with the largest at 107 inches (8.9 ft) dbh.
RW-V-1150-16	South of Myrtle Ave. along Ryan Slough, Myrtle town APNs: 016-181-002, 017-164-002, -003	<u>1</u> large, 3 <u>5</u> small alder 2 small willow 2 <u>3</u> small Cascara buckthorn <u>1</u> large redwood <u>1</u> large, 9 small grand fir	468 sq. ft. (H) blackberry 468 sq. ft. unknown brush (riparian and upland)	Located within the floodplain of Ryan Slough, which crosses the northern portion of the site. Contains mixed riparian and conifer woodland; primary tree species include redwood, Douglas fir, red alder and willow. Contains patches of emergent freshwater wetland, northern end is mapped as palustrine wetland. Contains suitable habitat for special status plants, wildlife and fish species.

* “Large” tree = diameter at breast height (dbh) is 12 inches or greater; “small” = dbh is less than 12 inches.

Table 1 (continued): Gas pipeline right-of-way vegetation maintenance activities proposed under CDP Application No. 9-17-0408

<i>Site #</i>	<i>Location</i>	<i>Proposed Tree Removal*</i>	<i>Proposed Brush Removal</i> (vegetation type)	<i>Existing Conditions /Environmental Setting</i>
RW-V-1146-16	South of Myrtle Ave. along Ryan Slough, Myrtle town APNs: 017-031-013, 017-164-002, 017-173-003, 017-221-001	1 large, 2 small willow + 3 large alder + 4 large, 1 small redwood 2 small grand fir	1296 1320 sq. ft. Unknown unspecified brush (riparian and upland)	Located within the floodplain of Ryan Slough. Contains mixed riparian and conifer woodland; primary tree species include redwood, Douglas fir, red alder and willow. Also contains patches of emergent freshwater wetland. Contains suitable habitat for special status plants, wildlife and fish species.
RW-V-1154-16	Elk River Rd. at Herrick Rd. Pine Hill (franchise area, County ROW)	+ 2 large, 3 small willow 1 large, 3 small alder + 4 large, 3 small Douglas fir <u>1 large, 2 small acacia</u> <u>2 large, 1 small Monterey pine</u>	1080 sq. ft. unspecified brush (riparian)	400-ft long roadside strip consisting largely of riparian vegetation (red alder, willow). Mapped as a seasonal scrub wetland. Contains an ephemeral stream tributary to Swain Slough. Contains suitable habitat for white-tailed kite.
RW-V-1176-16	Elk River Rd. south of Pine Hill Rd. APN: 305-021-017	None	756 sq. ft. (H) blackberry (non-native wetland)	375-ft long roadside strip within mapped palustrine wetland area; adjacent to both pastured and intact wetland habitat. Vegetation removal would be from a roadside ditch dominated by Himalayan blackberry. Suitable foraging habitat for white-tailed kite.
RW-V-1169-16	Elk River Rd. south of Pine Hill Rd. APN: 304-181-001	None	72 sq. ft. unspecified brush (freshwater wetland)	Located in a freshwater, palustrine wetland within the banks of upper Swain Slough. Contains suitable foraging habitat for white-tailed kite.
RW-V-2765-16 (northeastern segment)	East of Humboldt Hill Rd. at Golden W Dr. APN: 305-041-052	None	720 sq. ft. unspecified brush (freshwater wetland)	Coastal Zone portion of the project site appears to occur within a freshwater wetland complex (<i>Typha</i> spp.) largely surrounded by non-native grassland.
RW-V-2772-15	College of the Redwoods north campus APN: 307-021-021	3 large, 2 small Sitka spruce 2 large, 5 small grand fir	1260 sq. ft. brush (upland)	Located in a patch of mixed conifer forest surrounded by non-native grassland. Site access will require cross-country travel from College of the Redwoods. Brush includes thimble berry, sword fern, native blackberry and Himalaya blackberry, coyote brush and buckthorn.
RW-V-2752-15 RW-V-2758-15	College of the Redwoods north campus APN: 307-021-022	1 large, 2 small grand fir 1 small redwood 1 small Sitka spruce	2088 sq. ft. brush (upland)	Two adjacent project sites located on a hillside in the open space area north of campus. Brush assemblage is similar to RW-V-2772.

* "Large" tree = diameter at breast height (dbh) is 12 inches or greater; "small" = dbh is less than 12 inches.

Table 1 (continued): Gas pipeline right-of-way vegetation maintenance activities proposed under CDP Application No. 9-17-0408

<i>Site #</i>	<i>Location</i>	<i>Proposed Tree Removal*</i>	<i>Proposed Brush Removal</i> (vegetation type)	<i>Existing Conditions /Environmental Setting</i>
RW-V-2767-15	College of the Redwoods north campus APNs: 307-021-022, 307-051-013, 307-061-007	23 24 large, 1 small Monterey- pine 1 large, 1 small Douglas-fir 1 small grand fir	216 sq. ft. brush at grove edges (riparian)	Located in mixed conifer forest grove dominated by coast redwood (<i>Sequoia sempervirens</i>), Douglas-fir (<i>Pseudotsuga menziesii</i>), incense cedar (<i>Calocedrus decurrens</i>) and non-native Monterey pine (<i>Pinus radiata</i>), with native and exotic shrub understory, including coyote brush and blackberry. Riparian vegetation at grove edges includes willow, red alder, native blackberry. A small watercourse runs along the southern edge of the site.
RW-V-2760-15	College of the Redwoods north campus APNs: 307-011-013, -014 307-021--022	10 large Douglas-fir 2 3 large Monterey pine	3420 sq. ft. brush at grove edges (riparian) 720 sq. ft. brush within grove (upland)	Located in mixed conifer forest grove dominated by coast redwood (<i>Sequoia sempervirens</i>), Douglas-fir (<i>Pseudotsuga menziesii</i>), incense cedar (<i>Calocedrus decurrens</i>) and non-native Monterey pine (<i>Pinus radiata</i>), with native and exotic shrub understory, including coyote brush and blackberry. Riparian vegetation at grove edges include willow, red alder, native blackberry. A small watercourse runs along the southern edge of the site.
RW-V-2757-15	College of the Redwoods main campus APN: 307-061-007	16 large, 3 2 small redwoods 1 small other	408 180 sq. ft. unspecified brush (upland)	Site consists of remnant coast redwood conifer forest and ornamental vegetation within the main campus, surrounded by developed areas.
RW-V-11479-14	College of the Redwoods main campus APN: 307-011-014	6 1 large, 5 small willow 1 small red alder 2 large redwood 1 large Sitka spruce	none	Site consists of a remnant patch of riparian woodland along a small, unnamed stream and ditch, surrounded by roads and developed areas. Vegetation is dominated by red alder (<i>Alnus rubra</i>), with an understory of native and exotic blackberry, elderberry and willows. The stream and ditch support native emergent wetland vegetation.

* "Large" tree = diameter at breast height (dbh) is 12 inches or greater; "small" = dbh is less than 12 inches

Page 17, paragraph 2, lines 8-9:

... As presented in **Table 1**, the proposed vegetation removal involves the removal of a total of ~~149~~**163** large trees and the clearing of ~~X~~**62,000** square feet of brush from 24 individual work sites ...

Page 19, Table 3:

Table 3: Special-Status Wildlife Species with Potential to Occur at Project Sites

Scientific Name	Common Name	Regulatory Status*	Work Sites with Suitable Habitat
<i>Acipenser medirostris</i>	Green sturgeon	FT	RW-V-2732, -2733, -11464, -1146, -1150, -1152
<u>Agelaius tricolor</u>	<u>Tricolored blackbird</u>	<u>SC</u>	<u>RW-V-1146, -1150</u>
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	SC, SSC	RW-V-11464, -1146, -1150, -2559
<i>Elanus leucurus</i>	White-tailed kite	SFP	RW-V-1154, -1169, -1176, <u>-2765</u>
<i>Eucyclogobius newberryi</i>	Tidewater goby	FE, SSC	RW-V-2732, -2733, -11464, -2568, -1146, -1150, -1152
<i>Oncorhynchus clarkii clarkia</i>	Coast cutthroat trout	SSC	RW-V-2732, -2733, -11464, -2568, -1146, -1150, -1152
<i>Oncorhynchus mykiss</i>	Steelhead	FT	RW-V- <u>2733</u> , 1146, -1150, -1152
<i>Oncorhynchus tshawytscha</i>	Chinook Salmon	FT	RW-V- <u>2733</u> , 1146, -1150, -1152
<i>Rana aurora</i>	Northern red-legged frog	SSC	RW-V-2732, -2733
<i>Spirinchus thaleichthys</i>	Longfin smelt	FC, ST, SSC	RW-V-2732, -2733, -11464, -1146, -1150, -1152
<i>Thaleichthys pacificus</i>	Eulachon	FT	RW-V-2732, -2733, -11464, -1146, -1150, -1152

* FE = federally-listed endangered; FT = federally-listed threatened; FC = federal candidate for listing; ST = state listed threatened; SC = state candidate; SSC = state species of special concern; SFP = CDFW "fully protected".

Page 19, paragraph 2:

Several of the riparian and wetland project sites also contain suitable habitat for rare and sensitive wildlife species, including ... **tricolored blackbird and** Northern red-legged frog, ~~another~~ **both** state species of special concern ...

Page 20, paragraph 3, lines 4-6:

... In total, the proposed work at the 12 project sites containing riparian habitat would result in the removal of approximately ~~1.15~~ **1.24** acres (~~50,000~~ **53,900** square feet) of riparian vegetation and ~~83~~ **107** individual riparian trees ...

Page 20, paragraph 5, last sentence:

Similarly, project activities have the potential to directly harm or disrupt the behavior of rare and sensitive wildlife species, and to ~~destroy~~ **degrade** or alter the riparian and wetland habitats on which they depend.

Page 21, paragraph 3:

In total, PG&E proposes to remove ~~149~~ **163** large conifers **upland trees** (defined as trees with diameters at breast height (dbh) of 12 inches or greater) from project sites, including ~~88~~ **92** redwoods, ~~15~~ **18** Douglas-fir (*Pseudotsuga douglasii*) ...

Page 22, paragraph 3, lines 1-4:

In order to minimize the significant disruption of habitat values in ESHA, the Commission is adopting **Special Condition 3**, which requires PG&E ... to avoid project activities beyond these limits ~~during construction~~...

Page 22, paragraph 3, beginning line 7:

In order to assure protection of sensitive plant and wildlife species, the Commission is also including **Special Condition 4**, which requires PG&E to carry out pre-project, **species-specific** focused surveys of all proposed project sites ... for the presence of sensitive plant and wildlife species ... **Prior to carrying out the surveys, a survey plan shall be submitted to the Executive Director for review and approval in order to ensure that proper protocols are in place to determine the presence or absence of sensitive species with potential to occur within the vegetation removal area.**

Page 22, paragraph 4, beginning line 13:

Under this condition, if nesting or breeding activity is detected, PG&E shall establish a 300-foot (~~500-foot for raptors~~) **species-specific** exclusion zones ... **The size of the species-specific buffers shall be established in a Nesting Bird Protection Plan, to be submitted for Executive Director review and approval, using the best available science and expert recommendations and guidance from the CDFW and U.S. Fish and Wildlife Service.**

Page 22, paragraph 5, beginning line 4:

... Nonetheless, the proposed vegetation maintenance ... would still require the clearing of approximately ~~4.15~~ **1.24** acres of riparian woodland ESHA ... as well as ~~83~~-~~107~~ individual trees of riparian species and ~~149~~-~~163~~ large (12 inches dbh or greater) ~~conifers~~-**upland trees** ...

Page 23, paragraph 2, beginning line 7:

... Under this Special Condition, the clearing of ~~4.15~~ **1.24** acres of riparian vegetation shall be mitigated through the restoration ... of ~~3.45~~ **3.71** acres of riparian woodland habitat ... The removal of ~~83~~-~~107~~ riparian trees shall be mitigated through the planting of ~~249~~-~~321~~ native trees (e.g., willow, red alder), while the removal of ~~118~~-~~127~~ large native conifers shall be mitigated through the planting of ~~354~~-~~381~~ native trees ... The removal of ~~34~~-~~35~~ large exotic Monterey pine trees **and 1 large exotic acacia tree**, which are deemed to have lesser habitat value for native species, shall be compensated for by the planting of native tree species at a 1:1 ratio.

Page 25, Section IV.F (Cultural Resources), paragraph 2:

In addition, to ensure protection of any cultural resources that may be discovered at the site during ~~construction of~~ the proposed project, the Commission is including **Special Condition 10**. This special condition requires that if an area of cultural deposits is discovered during the course of the project, all ~~construction~~-**project activities** must cease ... To recommence ~~construction~~-**project activities** following discovery of cultural deposits, the permittee is required to submit ... **Additionally, Special Condition 10 requires PG&E to conduct a pre-project training program to educate field personnel about the potential for inadvertent discoveries of archaeological resources.**

Page 27, Section IV.H (Coastal Access and Recreation), paragraph 2:

PG&E has indicated that the proposed vegetation removal work at a given site would ~~to~~-last one to three days ...