

CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE
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F8a

CDP 1-20-0539 (PACIFIC GAS & ELECTRIC)

JUNE 10, 2022

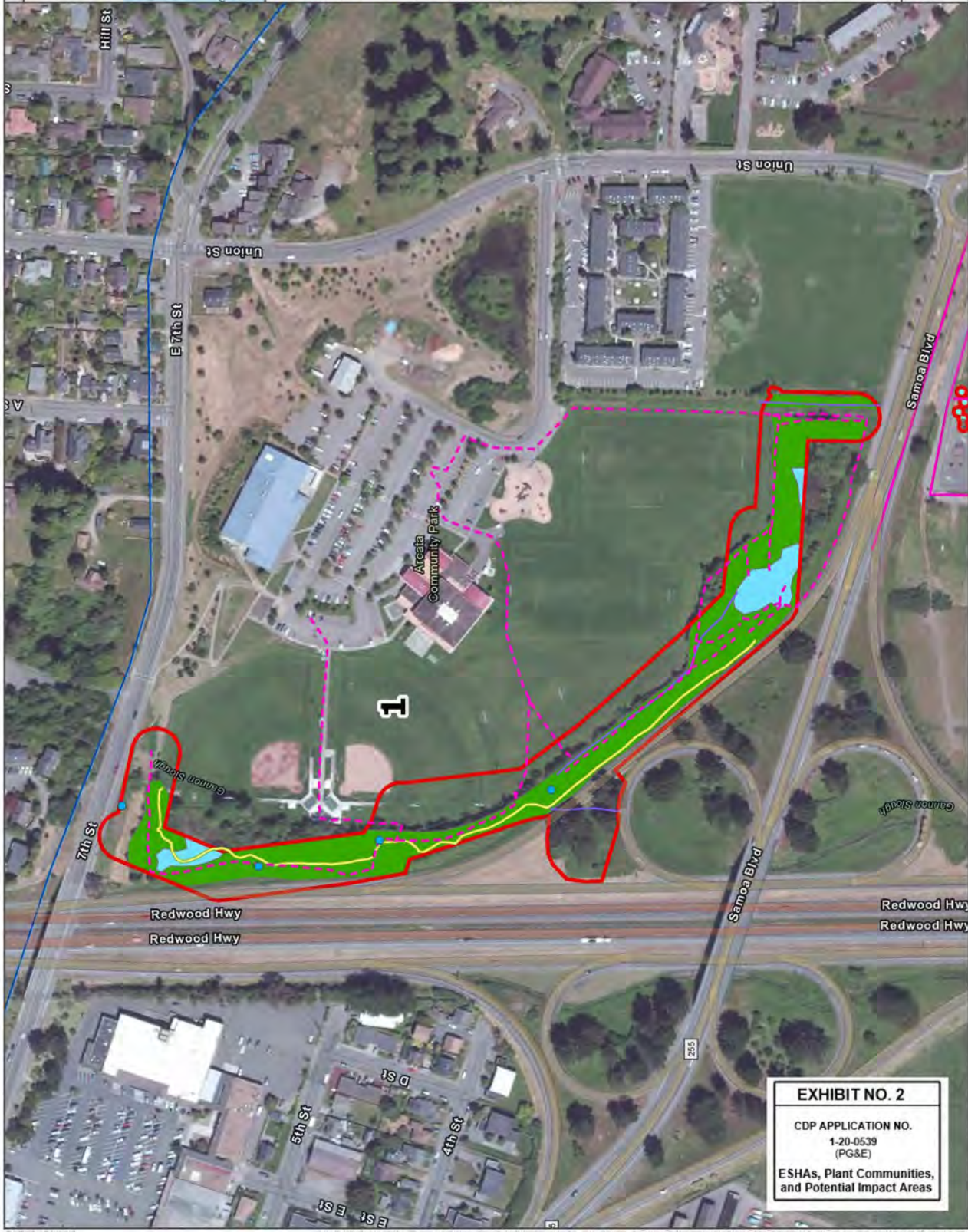
EXHIBITS

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- Tree Tops with DBH 12" or higher
- Potential Impact Area
- Sheet Boundary
- Coastal Zone
- Access Route
- Foot Access
- Sensitive Habitats
- Open water
- Wetland (palustrine emergent)
- Wetland (palustrine forested)
- Riparian
- Riverine



Sensitive Habitats

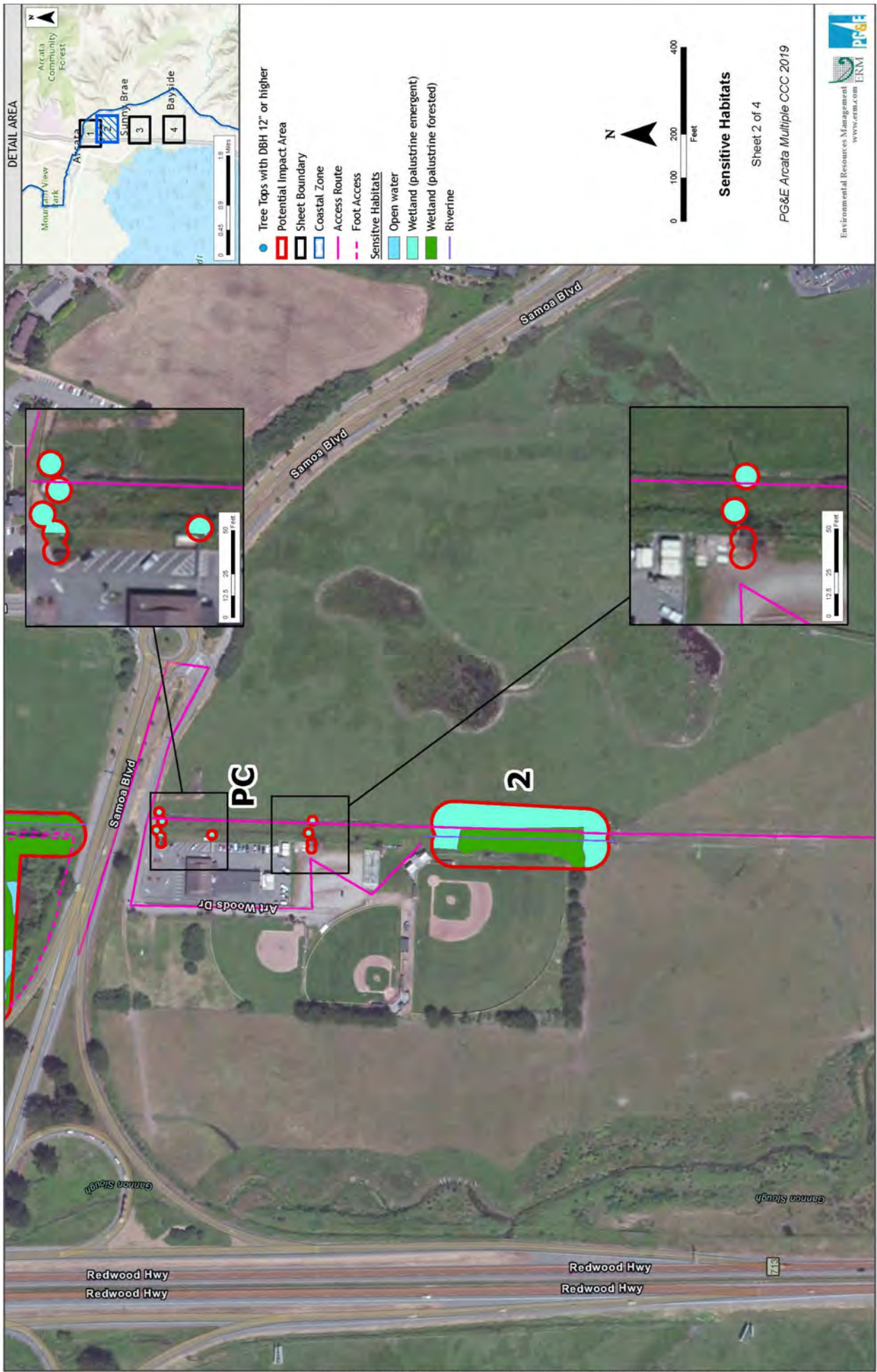
Sheet 1 of 4

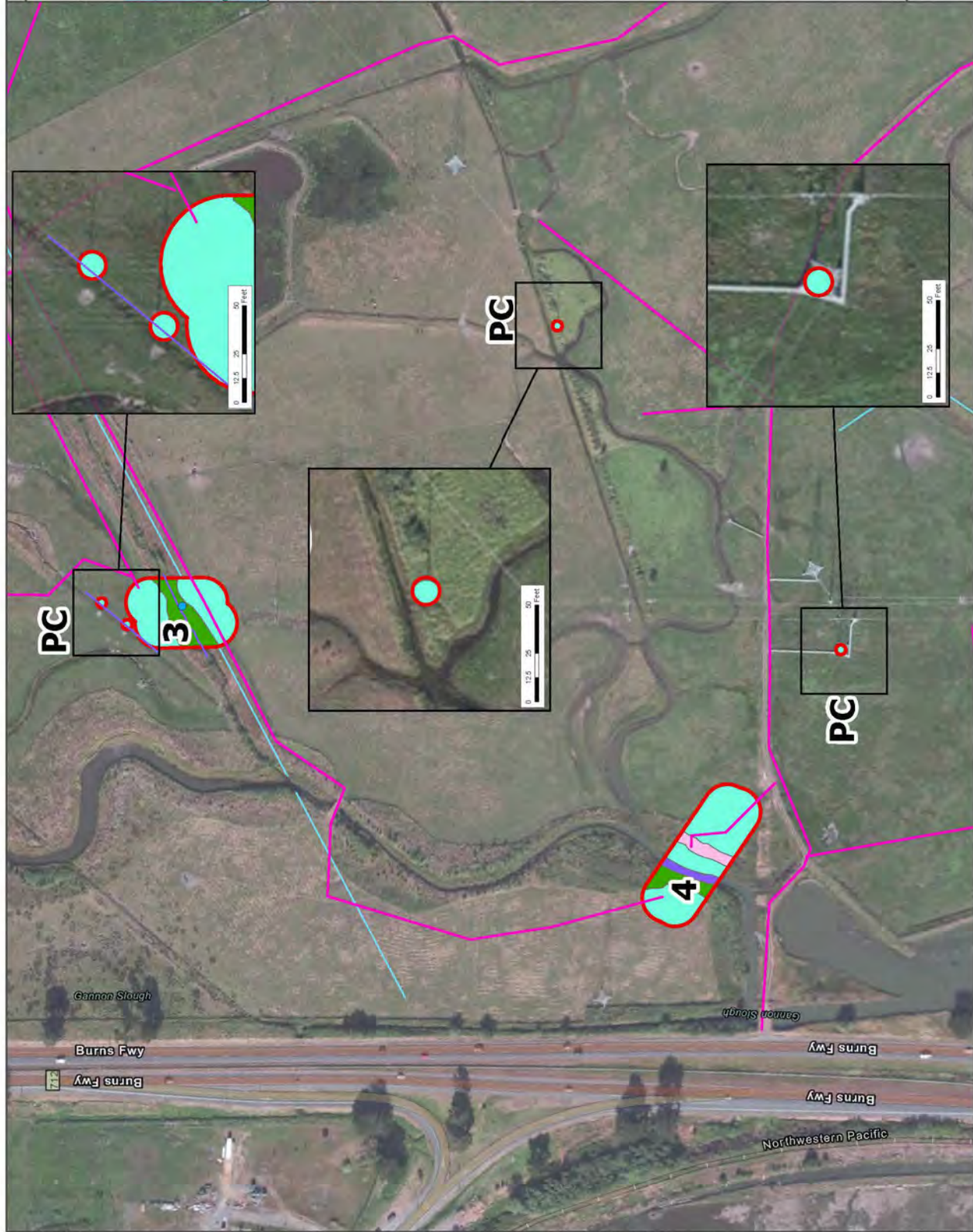
PG&E Arcata Multiple CCC 2019

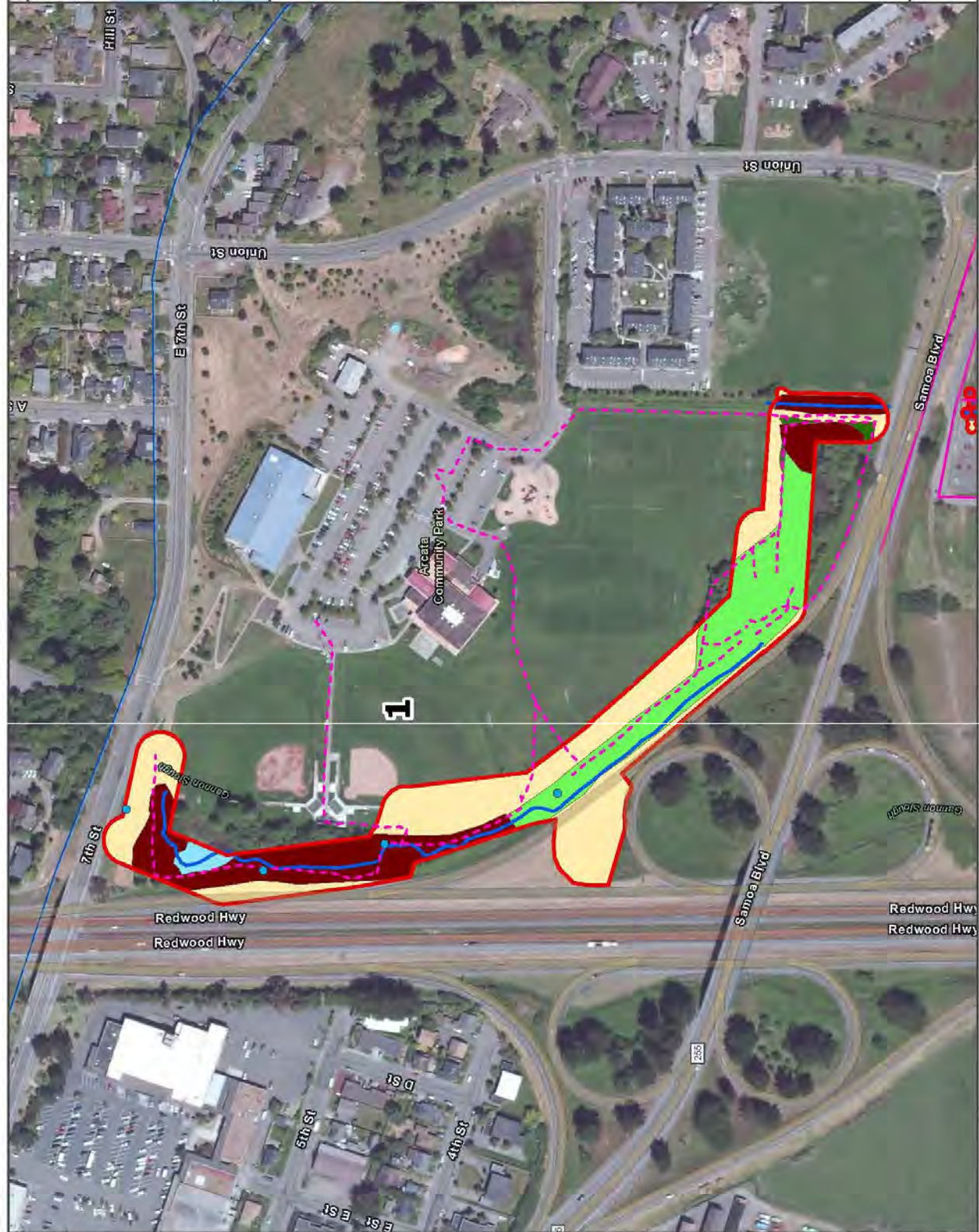
EXHIBIT NO. 2

CDP APPLICATION NO.
1-20-0539
(PG&E)

ESHAs, Plant Communities,
and Potential Impact Areas







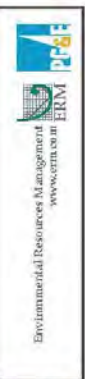
- Tree Tops with DBH 12" or higher
 - Potential Impact Area
 - Sheet Boundary
 - Coastal Zone
 - Access Route
 - - - Foot Access
 - CA Vegetation Alliances
 - Baltic and Mexican rush marshes
 - Cattail marshes
 - Duckweed blooms
 - Red alder forest
 - Ruderal
 - Sitka willow thickets
 - Water-parsley marsh
 - Wax myrtle scrub
 - Yellow pond-lily mats
 - Waterbody
- Slough sedge swards herbaceous alliance occurs throughout the work area north of Samoa Boulevard.



CA Vegetation Alliances

Sheet 1 of 4

PG&E Arcata Multiple CCC 2019



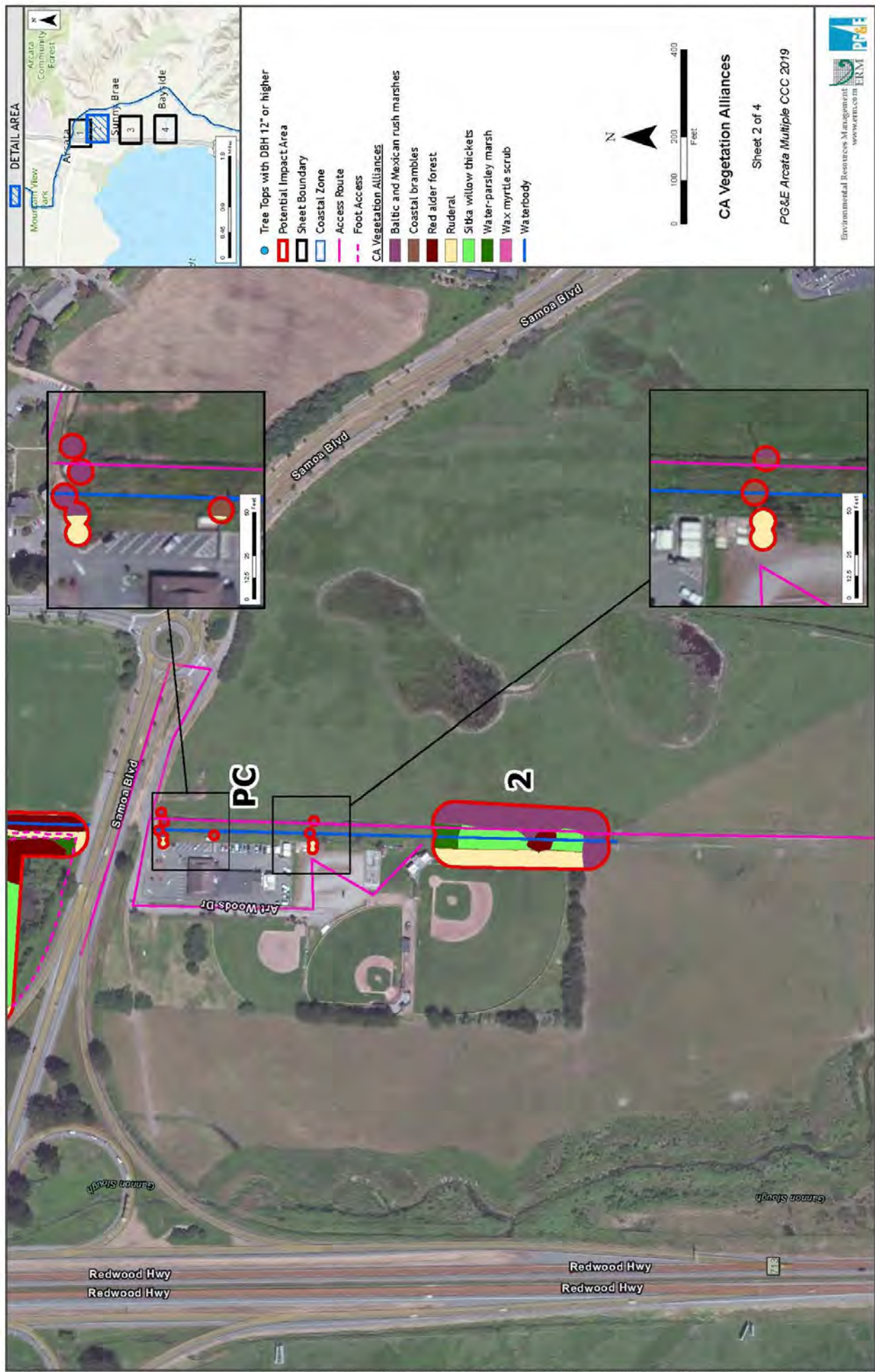


EXHIBIT NO. 3

CDP APPLICATION NO.

1-20-0539
(PG&E)

Estimated Work Scope

Attachment 12 Estimated Work Scope Based on Previous Inspections							
Site**	Location/Acres of Impacted Land	Types of Sensitive Habitat Present	Proposed Tree Work	Proposed Brush Work**	Estimated Volume of Material (yd ³)		
					Per Year	5-Year Permit	10-Year Permit
1	Sports Complex (6.65 Acres)	Open water Wetland (palustrine emergent) Wetland (palustrine forested) Riparian Riverine	12 alder trims (single stem ranging from 10-19 inches DBH) 2 cedar trim (14-inch and 24-inch DBH trees) 2 willow trim (12-inch and 15-inch DBH trees) 7 alder tops (single and multi-stems ranging from 5-11 inches DBH)*** 6 Bigleaf maple top (single and multi-stems ranging from 3-9 inches) 3 fruit tree tops (single stem ranging from 3-6 inches DBH) 1 plum top (multi-stem all less than 12 inches DBH) 68 willow tops (single and multi-stems ranging from 2-18 inches DBH)	trimming of 22 brush units	286	1430	2960
2	Little League Fields (1.29 Acres)	Wetland (palustrine emergent) Wetland (palustrine forested) Riverine	1 Monterey cypress trim (multi-stem 17-inch and 5-inch DBH) 29 willow tops (single and multi-stems ranging from 2-6 inches DBH)	trimming of 10 brush units	82.5	412.5	825
3	Gannon Slough (0.65 Acres)	Wetland (palustrine emergent) Wetland (palustrine forested) Riverine	4 alder removals (DBH less than 12 inches) 14 willow removals (multi-stem 8-inch average DBH) 1 alder top (18-inch DBH tree)	0	44.2	221	442
4	Highway 101 (0.84 Acres)	Riverine Wetland (estuarine emergent) Wetland (palustrine emergent) Wetland (palustrine forested)	6 spruce removals (6-inch DBH trees)	0	14	70	140
5	Bayside Outfall (1.32)	Riverine Wetland (palustrine emergent) Wetland (palustrine forested) Wetland (palustrine shrub)	1 alder trim (18-inch DBH tree) 7 willow removals (8-inch DBH trees) 3 willow tops (DBH ranging from 12-20 inches)	removal of 3 brush units	32.6	163	326
FC	Pole Clears (0.10)	Wetland (palustrine emergent)	5 willow trims (DBH ranging from 10-39 inches) 4 willow tops (20-inch DBH trees) 2 plum removals (6-inch and 10-inch dbh trees) 7 willow removals (DBH ranging from 4-9 inches)	removal of 65 brush units	298	1490	2980
Total	10.86			100	757.3	3786.5	7573

* Sites are identified on Figures 2 and 3.

** A brush unit is defined as a 6 foot by 6 foot area of brush.

*** "Tops" refers to pruning the top section of the canopy by removing the main stems of the tree/vegetation that constitute the hazard

(Adapted from PG&E)

EXHIBIT NO. 4

CDP APPLICATION NO.

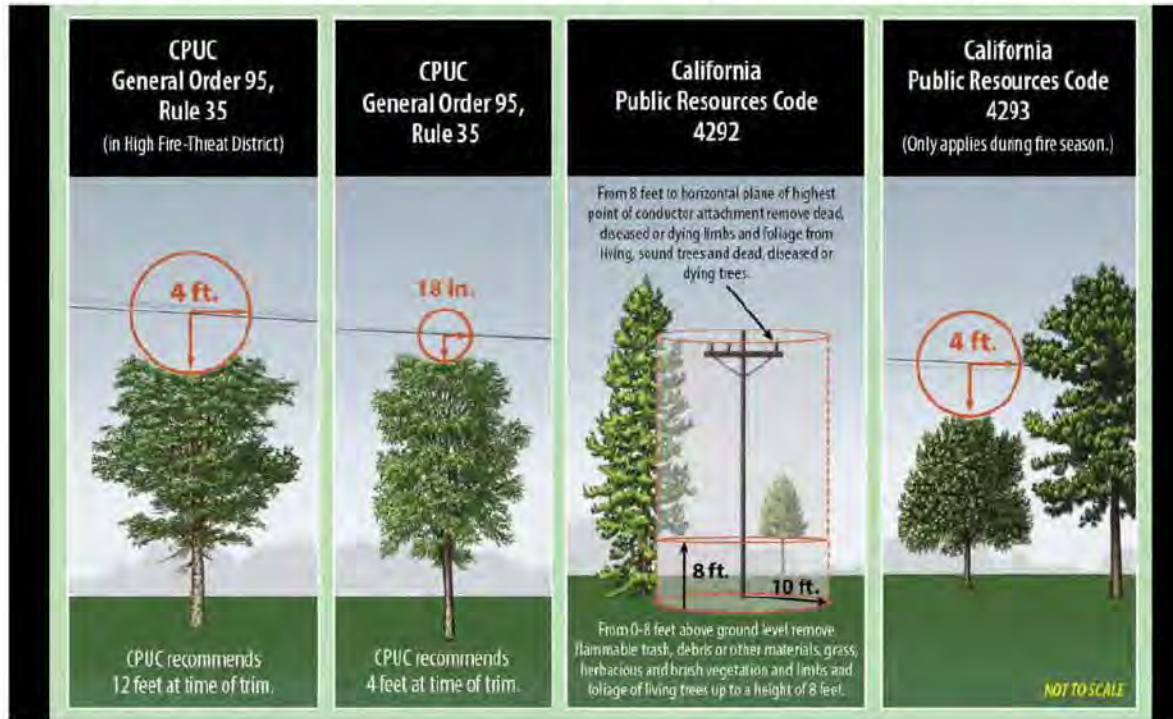
1-20-0539

(PG&E)

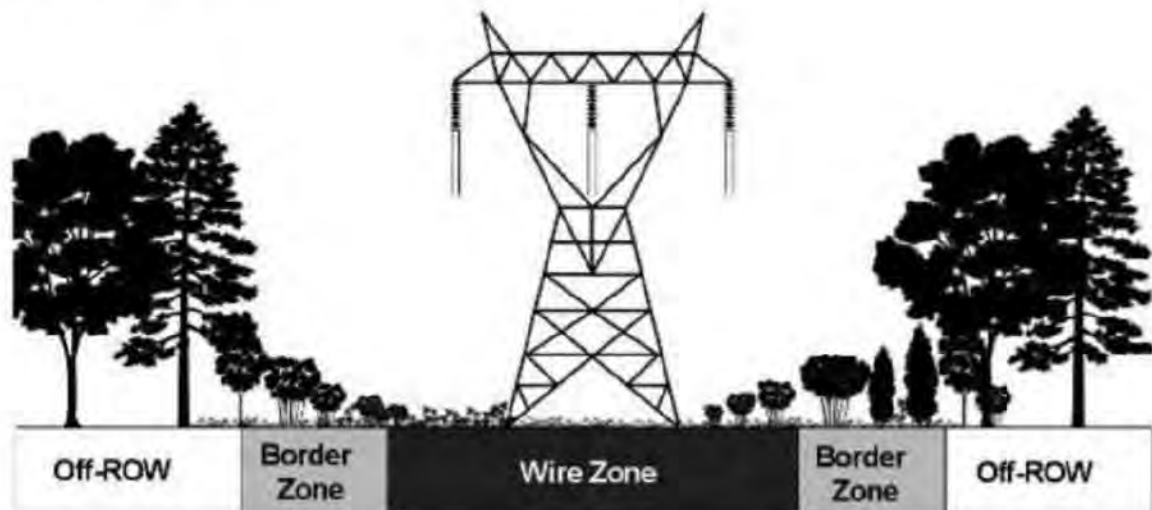
**Vegetation Clearance
Examples**

Figures

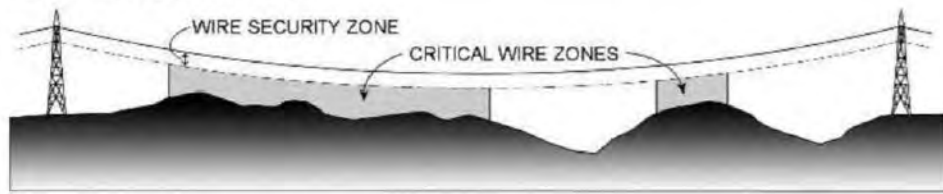
1. Example of Pole Clearing (Brushing) and Limbing/Pruning (Line Clearing) Requirements



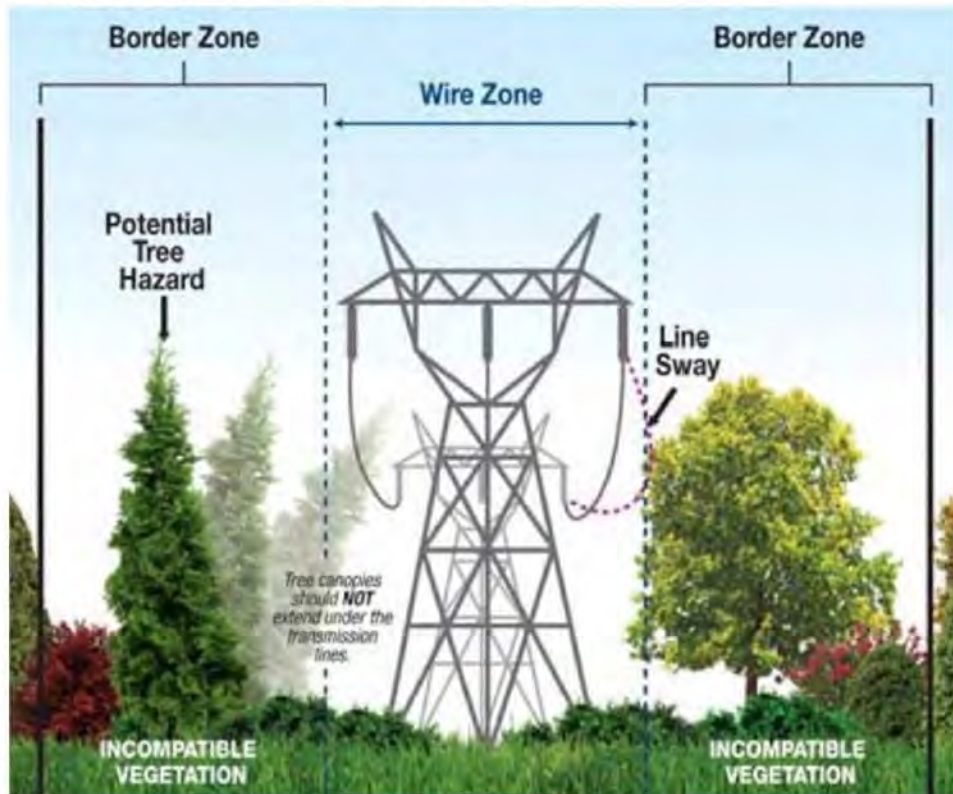
2. Wire Zone and Border Zone



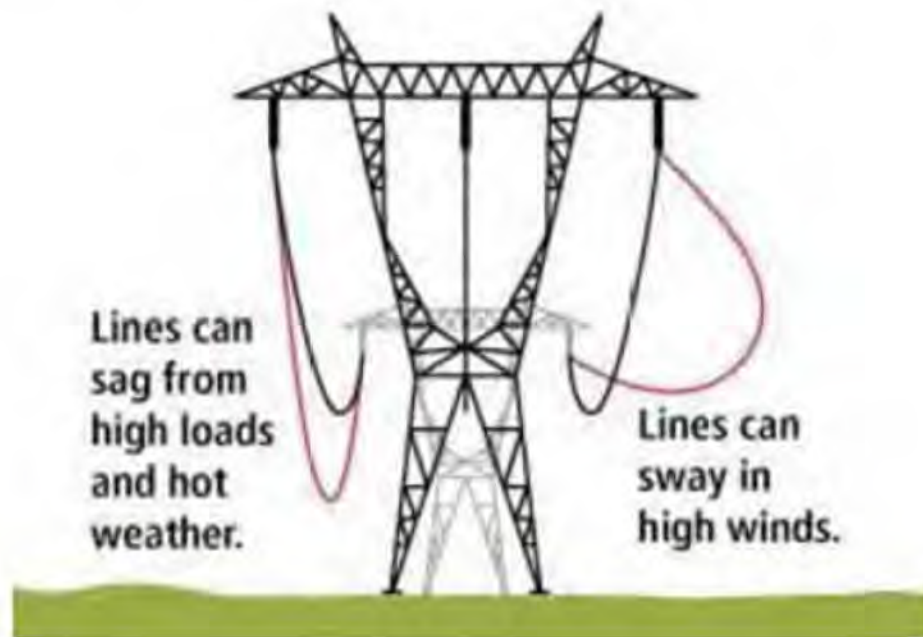
3. Profile View of the Wire Zone



4. Incompatible Vegetation in wire Zone and Border Zone



5. Examples of Sagging and Swaying Powerlines





Vegetation Management Bird Nest Procedure

Attachment 1, VM Bird Nest Brochure

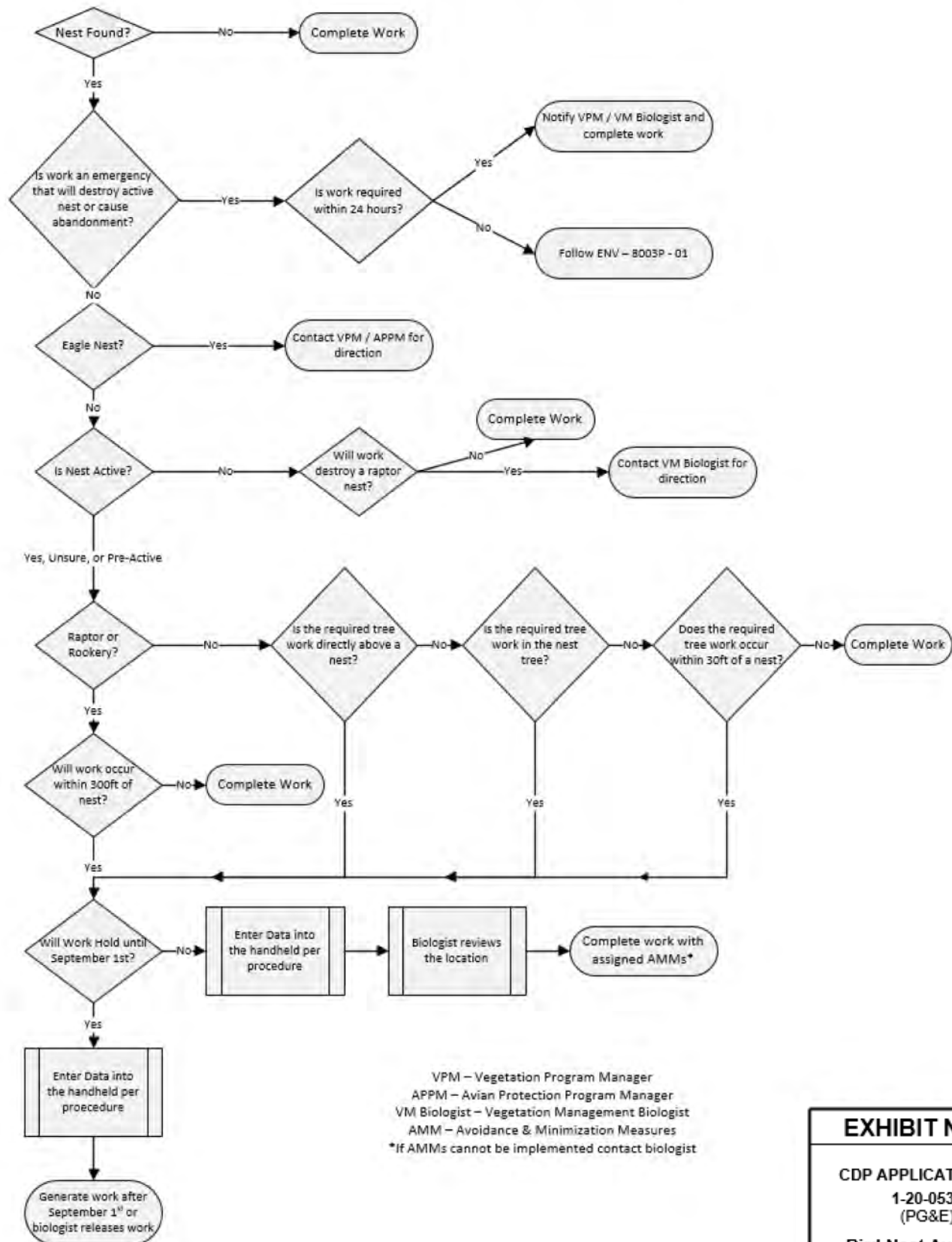


EXHIBIT NO. 5

CDP APPLICATION NO.
1-20-0539
(PG&E)
Bird Nest Avoidance
Procedures

Vegetation Management Bird Nest Procedure

Attachment 1, VM Bird Nest Brochure

Active nests are protected by law.

When and Where Birds Typically Nest

- Nesting season is generally February 15 to August 31, but active nests may occur nearly year-round.
- Nests can be in trees, shrubs, and cavities; on the ground; and on/in poles and towers.
- There is a wide variety of nests – from eggs laid right onto a flat area on the ground to complex cup-shaped baskets made from natural and artificial materials to large platforms made from sticks.

When Inspecting Trees (Pre-Inspectors [PI])

- Look for nests in trees and brush to be worked and in the surrounding area.
- Inspect cavities in trees to be worked and in nearby trees/poles for signs of nesting (whitewash or feathers by the opening or on the ground below, birds coming and going from the hole, and sounds of baby birds).
- Try to locate a nest in the area if you hear sounds of baby birds or see agitated adult birds.

When Working Trees (Tree Crews)

- Unless the work is an emergency or a biologist has given approval, work should **not** be done:
 - **Within ½ mile of eagle-sized active nests.**
 - **Within 300 feet of raptor active nests.**
 - **Directly above, within the nest tree, or within 30 feet of non-raptor active nests.**
- If an inactive nest was identified by PI, verify the nest is inactive before starting work. If possible, use a lift truck to see the entire nest. If eggs or birds are in the nest and work is prescribed in the area described above, do not proceed with the work and contact the Vegetation Program Manager (VPM).
- Be watchful for active nests in all areas. PI may have missed nests or new nests may have been built or become active since the PI patrol. If you find nests with eggs or birds in the areas described above, do not proceed with the work and contact the VPM.
- If an active nest can be positively identified as an exempt species, the above measures do not apply.

Definitions

- **Active nest:** Nests that contain viable eggs or young. Nests under construction are not “active” until eggs or nestlings are present but may become active within days. Perching sites and screening vegetation are not part of the active nest.
- **Eagle-sized:** 4-feet tall or more, and 6-feet wide or more
- **Exempt species:** Rock pigeon, Eurasian collared dove, house sparrow, and starling
- **Inactive nest:** Nests without viable eggs or young.
- **Raptor (bird-of-prey):** An eagle, hawk, harrier, osprey, owl, falcon, kite or vulture.

Injured/Dead Birds

- IF, in the process of performing Vegetation Management/Vegetation Control work, you find a bird that has been killed as a result of interaction with electric facilities, complete the Bird Incident Reporting Form, which will be forwarded to the PS&R Department, who will report to the Avian Protection Program Manager (APPM). If you find a dead eagle, contact the APPM.
- IF a bird is suspected to be injured as a result of electric contact THEN immediately report to the VPM.



April 14, 2022

TO: Jordan McKay
PG&E, Senior Land Consultant
Environmental Resources and Mitigation
127 East Main St, Grass Valley 95945

FR: Stephanie Martin
NCRM, Inc., Senior Project Manager
2501 N. State Street
Ukiah, CA 95482

RE: Conceptual plan for Arcata Sports Complex off site mitigation

EXHIBIT NO. 6

CDP APPLICATION NO.

**1-20-0539
(PG&E)**

**Conceptual Offsite
Habitat Mitigation Plan**

This proposal serves as the revised conceptual plan for the mitigation that is required to offset PG&E Vegetation Management work that impacted or will impact transmission and distribution lines at six work locations (see *Appendix A*). These are located adjacent to the Arcata Sports Complex south to the Bayside Cutoff. The vegetation compliance work was conducted under two Emergency Coastal Development Permits (ECDP#G-1-20-0031 and G-1-21-0034) that were issued on July 2nd, 2020, and September 9th, 2021. These two emergency CDPs were issued due to vegetation that was out of compliance that needed to be addressed prior to the Routine maintenance cycle. There is also a third permit pending for ongoing maintenance of the same areas (CDP#G-1-20-0539, 2022-2031) for a ten-year term. This permit has not yet been issued as a mitigation plan (based on this concept memo) is a requirement of that CDP being issued.

Vegetation Management work along powerlines and at the base of poles was conducted in 2020 and 2021 (ECDP#G-1-20-0031 and G-1-21-0034). Within the scope of those ECDPs, there was a combination of pruning and entering the ESHA (temporary impacts) and removing vegetation (permanent impacts). Additionally, further pruning and removals are anticipated within the same project areas for the next ten years (CDP#G-1-20-0539). PG&E considers that the removal of trees does permanently change the canopy cover and wildlife utilization of the area; however, PG&E does not consider the pruning and entering of the ESHAs to be a permanent change to the wetlands. There will be no fill, no change in hydrology, nor a change in water quality by pruning vegetation as part of a public safety requirement.

The following information was provided to the California Coastal Commission (CCC) in summary reports. In 2020, 18 trees were removed (permanent) and a total of 183,500 square feet (or 4.21 acres) of vegetation was temporarily affected. In 2021, three trees were removed (permanent), and 4,612 square feet (0.10 acres) of vegetation was temporarily affected. Thus, a total of 4.31 acres were temporarily impacted under the ECDPs, which also included a permanent impact of 21 tree removals.

Anticipated future impacts on the maintenance permit (CDP#1-20-0539) will occur in 2022-2031. Based on the number of trees removed in 2020 and 2021 (21), we anticipate the removal of an additional 40 trees between 2022-2031 which will be a permanent loss, and again temporary impacts are expected to occur in portions of the same work area. Because the exact locations of the vegetation removal(s) are uncertain from year-to-year, PG&E is using the work polygons where they overlap the ESHA, and where designated work has occurred, as shown in *Appendix A*, for a total of 4.78 acres.

The volume of pruning cannot be equated to acres for mitigation and pruning is not uniform with variables in size, scope, and species. Additionally, replanting onsite is not feasible due to the continued maintenance of the lines. The six polygons included in the work area for 2020 and 2021, are consistent with what will be entered into for future vegetation maintenance visits. In total, these work areas have a footprint of 4.78 acres where they overlap the ESHA designation. Not all the 4.78 acres will be impacted however, as portions of the polygons contain vegetation that does not require maintenance or will only require work on a sporadic basis. Most of the impact within the polygons is confined to linear elements and walking paths which impact a very small footprint



within the overall defined acreage. For the purposes of this proposal, we are including the entire 4.78 acres as being impacted from the annual entrance of foot traffic and vegetation pruning. This acreage over-estimates the area of impacts to vegetation, and as such we are proposing a 1:1 compensatory mitigation ratio.

CD Permit #	Permit Goal	Impact Year	Impacts (based on work polygons and ESHA overlap)	Proposed Mitigation Ratio	Mitigation Amount
1-20-0031	Emergency vegetation removal, one-time.	2020	4.31 acres	1:1 ESHA restoration	4.78 acres
1-21-0034	Emergency vegetation removal, one-time.	2021			
1-20-0539 (pending)	Ongoing maintenance, vegetation removal, 10 years.	2022-2031	0.47 acres		
TOTAL		2020-2031	4.78 acres		4.78 acres

As previously stated, impacts to the wetland environmentally sensitive habitat (ESHA) area were calculated within the impact areas from 2020 and 2021 at 4.31 acres. PG&E does not anticipate wetland fill, only temporary impacts associated with tree crew hand-pruning vegetation within an ESHA. The City of Arcata does not have ESHAs mapped in the project area. The area south of Samoa Boulevard to the Bayside Cutoff is considered “Agricultural Exclusive”. Despite the lack of a defined ESHA polygon by the City, the areas impacted certainly contain freshwater-emergent wetlands which will remain despite the vegetation management needed for purposes of public safety and CPUC requirements. The impacts to the ESHA, from repeated pruning efforts, do not devalue the ESHA. If the ESHA was filled or dredged, that would be a permanent impact. However, at this point in conversations with the Coastal Commission we have agreed to put aside the permanent and temporary impacts and look toward a solution of holistic habitat mitigation for the long-term impacts associated with the vegetation management work.

PG&E’s mitigation strategy for the impacts resulting from vegetation removal and impacts to the ESHA is to restore a riparian forest at a 1:1 ratio. PG&E feels that this ratio proposed is more than fair based on the overall area impacted within the larger defined project area polygons. Due to the impact location and being directly under power lines, there is no potential for onsite mitigation. The proposed mitigation for the three permits will be at an offsite location.

Mitigation Site -Cock Robin Island (CRI):

CRI is located south of Eureka, in Loleta, near the mouth of the Eel River. This is an existing and active project in partnership with California Department Fish and Wildlife (CDFW), including a Memorandum of Understanding (MOU). At this site, PG&E is currently restoring 4.15 acres of riparian woodland under an existing permit (CDP#9-17-0408) with an already approved planting pallet. We are proposing to follow the approved planting pallet and expand the planting area as mitigation for the ESHA impacts in and around the Arcata Sports Complex related to past and future vegetation removals.

The original planting plan at CRI was designed with a cluster structure, each cluster having 16 trees and 50 shrubs (such as red alder, wax myrtle, black cottonwood, and coyote bush). The existing planting area at CRI has an additional 7 acres available to mitigate on, and CDFW has agreed to allow us to use a portion of that for the Ballfields Mitigation. Also at this location, PG&E has a monitoring success component that is tied to the current permit, so the proposed new riparian forest plantings will be evaluated for at ten years as that is the length



of the pending permit (1-20-0539). PG&E has an active MOU already in place with CDFW, and the additional plantings being proposed are welcomed by CDFW as the ultimate goal at the CRI project site is to restore the entire agricultural area. The island provides a refuge for wildlife, and bird study areas are currently set up throughout the existing riparian vegetation.

The specific onsite impacts at the Arcata Sports Complex and surrounding project areas will be continual and ongoing considering the location of the electrical infrastructure. The temporary impacts are within an ESHA, but the value of such habitat within the City limits has to be considered especially when compared to the value of the habitat being restored at CRI. The long-term picture of the overall restoration at CRI is to provide permanent, unimpacted, riparian forest that will not only provide ongoing habitat for birds and other wildlife, but it will also inevitably support the long-term health and function of the greater Eel River drainage and the salmonid species within. We do not think the same can be said for the area impacted by regular tree and shrub removals.

The species list for the riparian forest planting is as follows, but may change with input from the Coastal Commission and CDFW:

Species Name	Common Name
<i>Populus balsamifera trichocarpa</i>	Black cottonwood
<i>Alnus rubra</i>	Red alder
<i>Morella californica</i>	Wax myrtle
<i>Salix lasiandra</i>	Pacific willow
<i>Salix lasiolepis</i>	Arroyo willow
<i>Salix sitchensis</i>	Sitka willow
<i>Populus balsamifera trichocarpa</i>	Black cottonwood
<i>Alnus rubra</i>	Red alder
<i>Morella californica</i>	Wax myrtle
<i>Salix lasiandra</i>	Pacific willow
<i>Salix lasiolepis</i>	Arroyo willow
<i>Salix sitchensis</i>	Sitka willow
<i>Baccharis pilularis</i>	Coyote brush
<i>Sambucus racemosa</i>	Red elderberry
<i>Lonicera involucrata</i>	Twinberry
<i>Rubus spectabilis</i>	Salmonberry
<i>Rubus parviflorus</i>	Thimbleberry
<i>Rosa californica</i>	California rose

It is the intention of this preliminary proposal that the mitigation work described above would take place in winter 2022-2023, and that once the concept plan is approved, PG&E would move forward with a formal Mitigation and Monitoring Plan to be approved by the Coastal Commission that would include a treatment plan and schedule, native plant species lists, installation plans, and ten years of maintenance and monitoring (2022-2031).

If you have any further questions or concerns, please do not hesitate to contact me. 530.263.4063

Thank you,

Stephanie L. Martin
Senior Project Manager



Appendix A. Mapped locations of the impacted areas overlapping the ESHA.



Arcata Sports Complex Site:



Photo 1. June 23, 2020, Representative photo of vegetation at Sports Complex site



Photo 2. May 22, 2020, Representative photo of vegetation at Sports Complex site

EXHIBIT NO. 7
CDP APPLICATION NO. 1-20-0539 (PG&E) Site Photos



Photo 3. Example of Vegetation Clearing Around Poles and Power Lines at Sports Complex Site.



Photo 4. June 23, 2020, Example of “Pole Clear” (brushing/vegetation removal)



Photo 6. Scirpus microcarpus is visible in the center and foreground of the photo during the February visit. Inset photo shows the dominant plant during June. It is a common understory species in many areas of the Project, but especially so in the North Project area.

Photo 5. Photo above courtesy PG&E depicts wetland habitat within northern portion of project area along the Gannon Slough riparian corridor.

Little League Ball Fields Site:



Photo 6. May 19, 2020, View looking southwest from near Samoa Blvd.



Photo 7. May 19, 2020, Close-up of willow-dominated riparian corridor.



Photo 8. May 19, 2020, View looking northwest towards Samoa Blvd.



Photo 10. Water-parsley marsh near the Little League Field.

Photo 9. Photo above provided by PG&E showing water parsley marsh surrounding a tributary adjacent to the little league field.



Photo 10. February 11, 2022, vegetation along edge of Little League fields following vegetation clearing activities.



Photo 11. February 11, 2022, vegetation along edge of Little League fields following vegetation clearing

Cock Robin Island Mitigation Site:



Photo 12. February 4, 2022, Representative photo depicting areas adjacent to existing riparian habitat where restoration mitigation is proposed.

Environmental Factors

The Study Area falls within an annual grassland vegetation community and on urban land use areas. The landform age is Pleistocene-Holocene⁸. The depositional environment is alluvial and the closest source of water is Gannon Slough and Humboldt Bay. Slope varies by area but ranges from 0-15%.

Native American Heritage Commission (NAHC) Sacred Lands File Search

A Sacred Lands File Search was conducted on September 18, 2020 (Attachments G and H). There were no results/resources within the API. The following tribes were identified in the NAHC Contact List:

- Bear River Band of Rohnerville Rancheria
- Blue Lake Rancheria
- Cher-Ae Heights Indian Community of the Trinidad Rancheria
- Wiyot Tribe

Consultation

☒ Native American ☒ Agency ☐ Other ☐ None

This report was sent to the California Coastal Commission for review.

On October 7, 2020 PG&E Senior Cultural Resources Specialist, Bronwynn Lloyd, sent notification letters to the following tribes identified in the NAHC contact list (Attachments G and H):

- Bear River Band of Rohnerville Rancheria
- Blue Lake Rancheria
- Cher-Ae Heights Indian Community of the Trinidad Rancheria
- Wiyot Tribe

Field Review

The API largely contains either highly developed residential areas or marshy sloughs. Because of this landscape, combined with the lack of resources in surveyed portions of the API, it was determined that field survey was not necessary for this effort.

Summary

In order to maintain safe and reliable electric service and mandated clearance to comply with federal and state regulatory requirements for public safety and fire prevention, PG&E proposes reoccurring maintenance, repair, and replacement of PG&E power lines along Humboldt Bay between the cities of Arcata and Bracut, in Humboldt County, CA. These activities would occur, as needed, on, under, or adjacent to the Arcata-Humboldt, Essex Jct-Arcata-Fairhaven, Humboldt #1, and Fairhaven-Humboldt 60kV transmission lines and the Arcata 1122 kV distribution line and their accompanying structures.

This review included the results from a desktop sensitivity assessment, examination of cultural resources data from PG&E's GIS database, a NAHC Sacred Lands search, and tribal notification. A 0.25-mile buffer around the power lines was identified as the Study Area for this work. Within this study area, Areas of Potential Impact (APIs) that would conservatively accommodate the work activities anticipated over the life of the permit were identified and analyzed. These can vary in size depending on the work being performed. The API has been defined as a 100-foot area around the transmission line (50 feet on either side of centerline). Adequate Survey Coverage (defined as areas that have been subject to studies that anticipated prehistoric and historic resources, had survey transects less than thirty meters apart, and were completed after 1995) covered different amounts of each API. Because of the mix of highly developed areas and lowland sloughs in the API, and documented low probability of resources occurring in the majority of the project area, a field study was deemed unnecessary.

There are sixteen recorded resources within the 0.25 Mile Study Area, one of which () intersects the API. Activities covered by this permit will not have an impact on this resource.). A NAHC search identified zero results/ resources

⁸ California Department of Conservation. "Geological Map of California." Geologic Map of California, 2015. <https://maps.conservation.ca.gov/cgs/gmc/>



within the API. Letters were sent to tribes identified by the NAHC notifying them of the project and outreach is ongoing (Attachments G and H).

All Work Activities will require standard PG&E BMPs. Activities that are ground disturbing will require the additional Resource Protection Measures (RPM) of a cultural resources awareness tailboard prior to starting work.

Cultural Resource Protection Measures

1. Inadvertent Discovery Protocol
2. Human Remains Protocol
3. Cultural resources awareness and response training must be provided. A field engineer, construction supervisor, or an environmental field services (EFS) person is required to read the Cultural Resources: Awareness and Response brochure to the construction crew prior to the start of ground disturbance.

Attachments

Attachment A: Study Area Maps
Attachment B: Activity and API Summary Table
Attachment C: Adequate Survey Coverage Maps
Attachment D: Report Summary Tables
Attachment E: Cultural Resources Maps
Attachment F: Cultural Resources Summary
Attachment G: NAHC Sacred Land File Results
Attachment H: Tribal Contact Letters

CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE
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ARCATA, CALIFORNIA 95521-5967
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WWW.COASTAL.CA.GOV

**EMERGENCY PERMIT**

Issue Date: July 2, 2020
Emergency Permit Number: G-1-20-0031

APPLICANT:

PG&E, Attn: Angela Deiana
2730 Gateway Oaks Drive
Sacramento, CA 95833

LOCATION OF EMERGENCY:

North and South of Samoa Blvd., east of the intersection with Highway 101, at the Arcata Sports Complex and Arcata Little League Facilities (APN(s): 503-202-004 and 503-042-017)

EMERGENCY WORK:

Clearing vegetation around electrical distribution and transmission lines (up to 135 sites total) as detailed in the emergency application materials received on May 22, 2020 and as further specified in the electronic mail (email) with attachment entitled "Arcata Transmission and Distribution VM SOW_062920.XLS" transmitted by PG&E manager Angela Deiana on June 29, 2020.

This letter constitutes approval of the emergency work you or your representative has requested to be done at the location listed above. I understand from your information that an unexpected occurrence in the form of rampant vegetation growth and encroachment within proximity of critical safety minimum clearance requirements posing a threat to electrical distribution and transmission structures at the Arcata Sports Complex and Arcata Little League facilities requires immediate action to prevent or mitigate loss or damage to life, health, property or essential public services pursuant to 14 Cal. Admin. Code Section 13009. The Executive Director of the California Coastal Commission hereby finds that:

(a) An emergency exists that requires action more quickly than permitted by the procedures for administrative or ordinary coastal development permits (CDPs), and that the development can and will be completed within 30 days unless otherwise specified by the terms of this Emergency Permit; and

(b) Public comment on the proposed emergency development has been reviewed if time allows.

EXHIBIT NO. 9

CDP APPLICATION NO.

1-20-0539
(PG&E)

2020 and 2021 Emergency
Permits Issued (16 pgs)

Emergency Permit Number:
G-1-20-0031

The emergency work is hereby approved, subject to the conditions listed on the attached pages.

Sincerely,

John Ainsworth
Executive Director

DocuSigned by:



Tamera Geddy, Coastal Program Analyst

cc: David Loya, Community Development Director, City of Arcata
Julie Neander, ES Deputy Director of Community Services, City of Arcata
Stan Shaffer, Park Facilities Natural Resources Supervisor, City of Arcata

Enclosures: 1) Acceptance Form;
2) Regular Permit Application Form

Emergency Permit Number:
G-1-20-0031

CONDITIONS OF APPROVAL:

1. The enclosed Emergency Permit Acceptance form must be signed by the PERMITTEE and returned to our office prior to onset of activity and within 15 days.
2. Only that work specifically described in this permit and for the specific property listed above is authorized. Work is further limited to the minimum necessary to abate the emergency and as detailed in the emergency application materials received on May 22, 2020 and as further specified in the electronic mail (email) with attachment entitled "Arcata Transmission and Distribution VM SOW_062920.XLS" transmitted by PG&E manager Angela Deiana on June 29, 2020. Any additional work requires separate authorization from the Executive Director.
3. If it is not feasible to remove vegetation that may provide potential nesting habitat outside of the avian nesting season (mid-March to mid-August), a survey for nesting birds in and adjacent to the project work area shall be conducted by a qualified biologist according to current California Department of Fish and Wildlife (CDFW) protocols no more than seven days prior to the commencement of vegetation removal activities. If any active nest is identified during pre-activity surveys, the biologist, in consultation with CDFW¹, shall determine the extent of an activity-free buffer zone to be established around the nest, and activity in the buffer zone shall be delayed until after the young have fledged, as determined by additional surveys conducted by a qualified biologist.
4. The permittee shall use relevant best management practices (BMPs) to protect on-site wetlands and other environmentally sensitive habitat areas from water quality impacts during vegetation removal activities as detailed in Attachment 6 of PG&E's emergency permit application (PG&E document TD-7102P-01-JA01, "Best Management Practices").
5. All staging of equipment shall be limited to the existing parking areas.

¹ Contact CDFW Northern Region staff (Senior Environmental Scientist Michael Van Hattem) at 707-499-9457.

Emergency Permit Number:
G-1-20-0031

6. No vehicles or other mechanized equipment needed for the tree pruning and removal operations shall be driven or operated within (a) riparian habitat areas, and (b) landscaped areas and paved pathways of the Arcata Sports Complex facility and the Arcata Little League facility, except that mechanized vehicles with track-mounted wheels and all-terrain quad vehicles may be used to access landscaped areas at the Sports Complex facility outside the field of play and within 12 feet of the fenceline adjacent to the vegetation corridor.
7. Equipment used to remove vegetation shall be limited to chainsaws and other non-mechanized hand tools.
8. No stockpiling of removed vegetation parts shall occur within the landscaped areas of the Arcata Sports Complex property and the Arcata Little League facility except in areas that are both outside the field of play and within 12 feet of the fencelines adjacent to the vegetation corridors.
9. No chipping of cut tree parts shall be performed on the subject properties.
10. All debris shall be removed from the sites within two days and disposed of lawfully at licensed disposal facilities.
11. The work authorized by this permit must be completed within 60 days of the date of this permit, which shall become null and void unless extended by the Executive Director for good cause.
12. The applicant recognizes that the emergency work is considered temporary unless and until a regular coastal development permit permanently authorizing the work is approved. A regular permit would be subject to all of the provisions of the California Coastal Act and may be conditioned accordingly.
13. In exercising this permit, the applicant agrees to hold the California Coastal Commission harmless from any liabilities for damage to public or private properties or personal injury that may result from the project.
14. This permit does not obviate the need to obtain necessary authorizations and/or permits from other agencies, including but not limited to the California Department of Fish & Wildlife, U.S. Fish & Wildlife, U.S. Army Corps of Engineers, and the California State Lands Commission.

Emergency Permit Number:
G-1-20-0031

15. Within 30 days of issuance of this Emergency Permit, or as extended by the Executive Director for good cause, the permittee shall submit, for the review and approval of the Executive Director, a plan for documenting the vegetation management work performed pursuant to the emergency permit that includes a summary report and photo-documentation for the authorized emergency work. The summary report shall include a description of (i) the dates and timing of the emergency work conducted; (ii) the vegetation pruning or removal work performed at each specific location within the project area, noting any differences between locations where work was performed and those proposed in the emergency permit application; (iii) the total area (in square feet) of wetland and riparian vegetation affected by the work performed and the total volume (in cubic yards) of vegetation removed at both the Arcata Sports Complex and the Arcata Little League Facilities; the BMPs and erosion control measures employed through the course of the emergency work; (iv) the location(s) where debris were disposed of; and (v) any handling of and observed impacts to sensitive, threatened, or endangered plant and animal species that occurred through the course of the authorized emergency work.

The photo-documentation shall include (a) representative photographs of locations where vegetation clearing and pruning was performed around the transmission lines and distribution lines at both the Sports Complex facility and the Little League facility and around the footings of transmission facilities at both facilities, (b) all locations where staging and stockpiling occurred, and (c) aerial or drone photography of the affected areas useful for comparison with aerial photographs of currently existing conditions to help evaluate the extent of impact to wetland and riparian vegetation and habitat affected by the emergency work. The permittee shall document the emergency work performed in accordance with the approved final plan and shall submit the summary report and photo documentation within 30 days of approval of the plan by the Executive Director or as extended by the Executive Director for good cause.

16. Within 90 days of issuance of this Emergency Permit, or as extended by the Executive Director through correspondence, for good cause, the applicant shall submit a complete follow-up Coastal Development Permit (CDP) application that satisfies the requirements of Section 13056 of Title 14 of the California Code of Regulations. The application shall additionally include a mitigation and monitoring plan to compensate for temporal and permanent loss of riparian

Emergency Permit Number:
G-1-20-0031

wetland habitat resulting from project activities and shall specify locations for mitigation within the same watershed where project impacts will occur.

If the Executive Director determines that the follow-up CDP application is incomplete and requests additional information, the applicant shall submit this additional information by a certain date, as established by the Executive Director. If such a follow-up CDP application is withdrawn by the applicant or is denied by the Commission, or if the follow-up CDP application remains incomplete for a period of 120 days after the Executive Director informs the applicant that the application is incomplete, all affected areas restored to their prior condition, after consultation with CCC staff and consistent with the Coastal Act, within 180 days, subject to any regulatory approvals necessary for such restoration.

Failure to a) submit a complete follow-up CDP Application that complies with Condition 8 above, or b) remove the emergency development and restore all affected areas to their prior condition after consultation with CCC staff, and consistent with the Coastal Act (if required by this Emergency Permit) by the date specified in this Emergency Permit², or c) comply with all terms and conditions of the required follow-up CDP, including any deadlines identified therein, or d) remove the emergency-permitted development and restore all affected areas to their prior condition after consultation with CCC staff and consistent with the Coastal Act immediately upon denial of the required follow-up CDP³ will constitute a knowing and intentional violation of the Coastal Act⁴ and may result in formal enforcement action by the Commission or the Executive Director. This formal action could include a recordation of a Notice of Violation on the applicant's property; the issuance of a Cease and Desist Order and/or a Restoration Order; imposition of administrative penalties for violations involving public access; and/or a civil lawsuit, which may result in the imposition of monetary penalties, including daily penalties of up to \$15,000 per violation per day, and other applicable penalties and other relief pursuant to Chapter 9 of the Coastal Act. Further, failure to follow all the terms and conditions of this Emergency Permit will constitute a knowing and intentional Coastal Act violation

² In some instances, a permit may also be required for removal.

³ As noted above, in some instances, a permit may also be required for removal.

⁴ The Coastal Act is codified in sections 30000 to 30900 of the California Public Resources Code. All further section references are to that code, and thus, to the Coastal Act, unless otherwise indicated.

CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE
1385 EIGHTH STREET, SUITE 130
ARCATA, CALIFORNIA 95521-5967
PH (707) 826-8950 FAX (707) 826-8960
WWW.COASTAL.CA.GOV



July 2, 2020

EMERGENCY PERMIT ACCEPTANCE FORM

TO: CALIFORNIA COASTAL COMMISSION
North Coast District Office
1385 Eighth Street, Suite 130
Arcata, California 95521-5967

RE: Emergency Permit No. G-1-20-0031

INSTRUCTIONS: After reading the attached Emergency Permit, please sign this form and return to the North Coast District Office within 15 working days from the permit's date.

I hereby understand all of the conditions of the emergency permit being issued to me and agree to abide by them.

I also understand that the emergency work is TEMPORARY and that a regular Coastal Development Permit is necessary for any permanent installation. I agree to complete the regular Coastal Development Permit application within 90 days of the date of the emergency permit. Finally, I understand that my failure either to:

- a) Submit a complete follow-up Coastal Development Permit (CDP) Application that satisfies the requirements of Section 13056 of Title 14 of the California Code of Regulations by the date specified in this Emergency Permit, which date may be extended by the Executive Director for good cause, or
- b) Restore all affected areas to their prior condition after consultation with Coastal Commission staff and consistent with the Coastal Act, will constitute a knowing and intentional violation of the Coastal Act and may result in formal enforcement action by the Commission or the Executive Director.

This formal action could include a recordation of a Notice of Violation on my property; the issuance of a Cease and Desist Order and/or Restoration Order; imposition of administrative penalties for violations involving public access, and/or a civil lawsuit, which may result in the imposition of monetary penalties, including daily penalties of up to \$15,000 per violation per day, and other applicable penalties and other relief pursuant to Chapter 9 of the Coastal Act. Further, failure to follow all the terms and conditions of this Emergency Permit will constitute a knowing and intentional Coastal Act violation.

Emergency Permit Acceptance Form
G-1-20-0031

Sincerely,

John Ainsworth
Executive Director

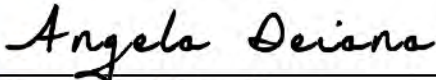
DocuSigned by:



Tamara Gedik
7C47847109B34D9...
Coastal Program Analyst

cc: Commissioners/File

DocuSigned by:



Signature of Permittee or
Authorized Representative
57A09198244F461

Angela Deiana

Print Name

Address: 77 Beale Street Mail Room B28P
Mail Room B28P
San Francisco, CA 94105

07/02/2020

Date of Signing

CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE
1385 EIGHTH STREET, SUITE 130
ARCATA, CALIFORNIA 95521-5967
PH (707) 826-8950 FAX (707) 826-8960
WWW.COASTAL.CA.GOV

**EMERGENCY PERMIT**

Issue Date: September 9, 2021
Emergency Permit Number: G-1-21-0034

APPLICANT:

PG&E, Attn: Nicole Reese
2730 Gateway Oaks Drive
Sacramento, CA 95833
Email: NRM6@pge.com

LOCATION OF EMERGENCY:

North and South of Samoa Blvd., east of the intersection with Highway 101, at the Arcata Sports Complex and along a portion of Jacoby Creek (APN(s): 503-202-003, 503-202-004, 501-061-001, and 501-061-023), Humboldt County

EMERGENCY WORK:

Clearing vegetation around electrical distribution and transmission lines at up to 45 sites (including removal of three trees each less than 12 inches dbh (diameter at breast height), trimming/topping of 48 trees, and trimming of 29 "brush units").

This letter constitutes approval of the emergency work you or your representative has requested to be done at the location listed above. I understand from your information that an unexpected occurrence in the form of rampant vegetation growth and encroachment within proximity of critical safety minimum clearance requirements posing a threat to electrical distribution and transmission structures at the Arcata Sports Complex and within a portion of the Jacoby Creek Gannon Slough Wildlife Area requires immediate action to prevent or mitigate loss or damage to life, health, property or essential public services pursuant to 14 Cal. Admin. Code Section 13009. The Executive Director of the California Coastal Commission hereby finds that:

(a) An emergency exists that requires action more quickly than permitted by the procedures for administrative or ordinary coastal development permits (CDPs), and that the development can and will be completed within 30 days unless otherwise specified by the terms of this Emergency Permit; and


(b) Public comment on the proposed emergency development has been reviewed if time allows.

The emergency work is hereby approved, subject to the conditions listed on the attached pages.

Emergency Permit Number:
G-1-21-0034

Sincerely,

John Ainsworth
Executive Director

DocuSigned by:

7C47047109B34D9...

Tamara Gedik, Coastal Program Analyst

cc: David Loya, Community Development Director, City of Arcata
Emily Sinkhorn, ES Deputy Director of Community Services, City of Arcata
Mike Rice, Park Facilities Natural Resources Supervisor, City of Arcata

Enclosure: Acceptance Form

Emergency Permit Number:
G-1-21-0034

CONDITIONS OF APPROVAL:

1. The enclosed Emergency Permit Acceptance form must be signed by the PERMITTEE and returned to our office prior to onset of activity and within 15 days.
2. Only that work specifically described in this permit and for the specific property listed above is authorized. Work is further limited to the minimum necessary to abate the emergency and as detailed in the emergency application materials received electronically by PG&E Interim Supervisor Nicole Reese on August 27, 2021. Any additional work requires separate authorization from the Executive Director.
3. The permittee shall use relevant best management practices (BMPs) to protect on-site wetlands and other environmentally sensitive habitat areas from water quality impacts during vegetation removal activities as detailed in Attachment E of PG&E's emergency permit application ("Proposed Measures").
4. All staging of equipment shall be limited to the existing parking areas.
5. No vehicles or other mechanized equipment needed for the tree pruning and removal operations shall be driven or operated within (a) riparian habitat areas, and (b) landscaped areas and paved pathways of the Arcata Sports Complex facility, except that mechanized vehicles with track-mounted wheels and all-terrain quad vehicles may be used to access landscaped areas at the Sports Complex facility outside the field of play and within 12 feet of the fence line adjacent to the vegetation corridor.
6. Equipment used to remove vegetation shall be limited to chainsaws and other non-mechanized hand tools.
7. No stockpiling of removed vegetation parts shall occur within the landscaped areas of the Arcata Sports Complex property except in areas that are both outside the field of play and within 12 feet of the fence lines adjacent to the vegetation corridors.
8. No chipping of cut tree parts shall be performed on the subject properties.
9. All debris shall be removed from the sites within two days and disposed of lawfully at licensed disposal facilities.

Emergency Permit Number:
G-1-21-0034

10. The work authorized by this permit must be completed within 60 days of the date of this permit, which shall become null and void unless extended by the Executive Director for good cause.
11. The applicant recognizes that the emergency work is considered temporary unless and until a regular coastal development permit permanently authorizing the work is approved. A regular permit would be subject to all of the provisions of the California Coastal Act and may be conditioned accordingly.
12. In exercising this permit, the applicant agrees to hold the California Coastal Commission harmless from any liabilities for damage to public or private properties or personal injury that may result from the project.
13. This permit does not obviate the need to obtain necessary authorizations and/or permits from other agencies, including but not limited to the California Department of Fish & Wildlife, U.S. Fish & Wildlife, U.S. Army Corps of Engineers, and the California State Lands Commission.
14. Within 90 days of issuance of this Emergency Permit, or as extended by the Executive Director for good cause, the permittee shall submit, for the review and approval of the Executive Director, documentation of vegetation management work performed pursuant to the emergency permit that includes a summary report and photo-documentation for the authorized emergency work. The summary report shall include a description of (i) the dates and timing of the emergency work conducted; (ii) the vegetation pruning or removal work performed at each specific location within the project area, noting any differences between locations where work was performed and those proposed in the emergency permit application; (iii) the total area (in square feet) of wetland and riparian vegetation affected by the work performed and the total volume (in cubic yards) of vegetation removed at both the Arcata Sports Complex and within the Jacoby Creek Gannon Slough Wildlife Area; the BMPs and erosion control measures employed through the course of the emergency work; (iv) the location(s) where debris were disposed of; and (v) any handling of and observed impacts to sensitive, threatened, or endangered plant and animal species that occurred through the course of the authorized emergency work.

The photo-documentation shall include (a) representative photographs of locations where vegetation clearing and pruning was performed around the transmission lines and distribution lines at both the Sports Complex facility and

Emergency Permit Number:
G-1-21-0034

within the Jacoby Creek Gannon Slough Wildlife Area and around the footings of transmission facilities at both locations, and (b) all locations where staging and stockpiling occurred.

15. Within 90 days of issuance of this Emergency Permit, or as extended by the Executive Director through correspondence, for good cause, the applicant shall submit a complete application for one or both of the following: (a) a follow-up Coastal Development Permit (CDP) that satisfies the requirements of section 13056 of Title 14 of the California Code of Regulations (CCR), or (b) a public works long-range land use development plan ("Public Works Plan") that satisfies the requirements of 14 CCR sections 13350 et seq. The application(s) shall additionally include a mitigation and monitoring plan to compensate for temporal and permanent loss of riparian wetland habitat resulting from project activities and shall specify locations for mitigation where project impacts will occur.

If the Executive Director determines that the follow-up CDP application is incomplete and requests additional information, the applicant shall submit this additional information by a certain date, as established by the Executive Director. If such a follow-up CDP application is withdrawn by the applicant or is denied by the Commission, or if the follow-up CDP application remains incomplete for a period of 120 days after the Executive Director informs the applicant that the application is incomplete, all affected areas restored to their prior condition, after consultation with CCC staff and consistent with the Coastal Act, within 180 days, subject to any regulatory approvals necessary for such restoration.

Failure to a) submit a complete follow-up application that complies with Condition 15 above, or b) remove the emergency development and restore all affected areas to their prior condition after consultation with CCC staff, and consistent with the Coastal Act (if required by this Emergency Permit) by the date specified in this Emergency Permit¹, or c) comply with all terms and conditions of the required follow-up CDP, including any deadlines identified therein, or d) remove the emergency-permitted development and restore all affected areas to their prior condition after consultation with CCC staff and consistent with the Coastal Act immediately upon denial of the required follow-up CDP² will constitute a

¹ In some instances, a permit may also be required for removal.

² As noted above, in some instances, a permit may also be required for removal.

Emergency Permit Number:
G-1-21-0034

knowing and intentional violation of the Coastal Act³ and may result in formal enforcement action by the Commission or the Executive Director. This formal action could include a recordation of a Notice of Violation on the applicant's property; the issuance of a Cease and Desist Order and/or a Restoration Order; imposition of administrative penalties for violations involving public access; and/or a civil lawsuit, which may result in the imposition of monetary penalties, including daily penalties of up to \$15,000 per violation per day, and other applicable penalties and other relief pursuant to Chapter 9 of the Coastal Act. Further, failure to follow all the terms and conditions of this Emergency Permit will constitute a knowing and intentional Coastal Act violation.

³ The Coastal Act is codified in sections 30000 to 30900 of the California Public Resources Code. All further section references are to that code, and thus, to the Coastal Act, unless otherwise indicated.

CALIFORNIA COASTAL COMMISSION

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ARCATA, CALIFORNIA 95521-5967
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WWW.COASTAL.CA.GOV



September 9, 2021

EMERGENCY PERMIT ACCEPTANCE FORM

TO: CALIFORNIA COASTAL COMMISSION
North Coast District Office
1385 Eighth Street, Suite 130
Arcata, California 95521-5967

RE: Emergency Permit No. G-1-21-0034

INSTRUCTIONS: After reading the attached Emergency Permit, please sign this form and return to the North Coast District Office within 15 working days from the permit's date.

I hereby understand all of the conditions of the emergency permit being issued to me and agree to abide by them.

I also understand that the emergency work is TEMPORARY and that a regular Coastal Development Permit is necessary for any permanent installation. I agree to complete the regular Coastal Development Permit application within 90 days of the date of the emergency permit. Finally, I understand that my failure either to:

- a) Submit a complete follow-up Coastal Development Permit (CDP) Application that satisfies the requirements of Section 13056 of Title 14 of the California Code of Regulations¹ by the date specified in this Emergency Permit, which date may be extended by the Executive Director for good cause, or
- b) Restore all affected areas to their prior condition after consultation with Coastal Commission staff and consistent with the Coastal Act, will constitute a knowing and intentional violation of the Coastal Act and may result in formal enforcement action by the Commission or the Executive Director.


¹ As indicated in Emergency Permit No. G-1-21-0034, the applicant shall submit a complete application for one or both of the following: (a) a follow-up Coastal Development Permit (CDP) that satisfies the requirements of section 13056 of Title 14 of the California Code of Regulations (CCR), or (b) a public works long-range land use development plan ("Public Works Plan") that satisfies the requirements of 14 CCR sections 13350 et seq.

Emergency Permit Acceptance Form
G-1-21-0034

This formal action could include a recordation of a Notice of Violation on my property; the issuance of a Cease and Desist Order and/or Restoration Order; imposition of administrative penalties for violations involving public access, and/or a civil lawsuit, which may result in the imposition of monetary penalties, including daily penalties of up to \$15,000 per violation per day, and other applicable penalties and other relief pursuant to Chapter 9 of the Coastal Act. Further, failure to follow all the terms and conditions of this Emergency Permit will constitute a knowing and intentional Coastal Act violation.

Sincerely,

John Ainsworth
Executive Director

DocuSigned by:

7C47047109B34D9...
Tamara Gedik
Coastal Program Analyst

cc: Commissioners/File

DocuSigned by:

4840EF8643A6419...
Signature of Permittee or
Authorized Representative
Nicole Reese

Print Name

2730 Gateway Oaks
Address: suite 230
Sacramento, CA
95833
09/10/2021
Date of Signing