Midcoast Community Council Agenda Memorandum

Meeting Date: November 8, 2017

To: Midcoast Community Council (MCC)

From: Lisa Ketcham, Chair

Dave Olson, Vice Chair

Subject: PG&E Major Tree/Shrub Removal Project along south side of Hwy 92

for gas line maintenance, PLN2017-00422

Project Summary

County Planning requests MCC comment on this early referral by Nov 8. The Planning Commission will be the decision-maker for the CDP. County Counsel has determined that the work, which has taken place in several areas of the County, is exempt from any County zoning including the Significant Tree Ordinance or CEQA.

PG&E is applying for CDP to perform vegetation maintenance within their existing Rights-of-Way (ROW), containing high-pressure gas transmission pipelines, in order to improve emergency access and for safety concerns in accordance with PG&E's ROW Management Utility Standard 4490S. This standard requires removal of all woody vegetation within 5 feet on each side of the pipeline and trees out to 14 feet on each side.

The three pipeline ROW segments covered by this application are along Pilarcitos Creek or its tributaries, which is critical habitat for CA red-legged frog and steelhead trout. Equipment used may include chainsaws, bucket trucks, and chippers. Trees/shrubs will be cut flush to the ground and may be treated with an herbicide to kill roots and prevent regrowth. All cut vegetation will be removed from the site. Site access is available from Hwy 92 and may require one-lane traffic control. A total of 183 trees and 853 brush units (10,200 sq.ft.) are to be removed.

- RW_V_12162_14 is the eastern-most segment, extending from Pilarcitos Creek and gas pipeline crossing under Hwy 92 at the Christmas tree farm to HMB Nursery eastern exit: Removal of 69 trees (western mountain ash, buckeye, western red cedar, elm, madrone, aleppo pine, ponderosa pine, including 11 significant trees) & 5,580 s/f clearing of brush (155 units). Trees and brush will be removed from creek bank and top of bank next to Hwy 92. Jan 2016 creek flow was swift, 12 ft wide and 3 ft deep.
- RW_V_6360_15: Removal of 60 trees (birch, incense cedar, Macnab cypress, eucalyptus, ponderosa pine, poplar, redwood, blue spruce, willow, including 21 significant trees) and 2,160 s/f clearing of brush (66 units). Trees/shrubs to be removed from very steep section of creek bank and above the bank. Jan 2016 creek flow was 15 ft wide and 4 ft deep.
- RW_V_6348_15: Removal of 20 poplar trees & 2,448 s/f clearing of brush (68 units) including toyon, from both sides of Corinda los Trancos Creek, where it passes under 92 at 0x Mountain landfill entrance. Jan 2016 creek flow was 6 ft wide and 2 ft deep.

Suggested comments on this application for MCC consideration:

Creek bank stability

Creek banks should be exempt from clearing of native vegetation in order to protect slope stability and prevent erosion and sedimentation. The CDP water quality discussion does not consider eroding creek banks due to steep denuded slopes and rapid stormwater flow. PG&E Utility Standard 4490S provides for exemptions for environmentally sensitive areas.

Invasive weeds

CDP application form #4 checked yes for "pampas grass, invasive brooms or weedy thistle", but there is no mention of this in the supporting discussion. LCP Policy 7.52 requires public agencies to remove these invasive weeds from their lands. Vegetation clearing favors the spread and establishment of invasive weeds.

Visual resources

Locally native and significant trees proposed for removal should be clearly marked so the public can become aware of the plans and comment. The CDP aesthetics discussion determined "no impact." There was no mention that this section of Hwy 92 is a County-designated scenic corridor, to be enjoyed while traveling the roadway, without need for vista areas to stop and observe the surrounding area. PG&E Utility Standard 4490S provides for border zone exemptions: "6.1 Integrity management personnel may elect to exempt specific trees or woody vegetation for removal from the border zone."

Nesting birds

Relying on a nesting bird survey for such a massive tree/brush removal project is unrealistic. The work should be scheduled during Aug/Sept, after bird nesting season and before winter rains.