



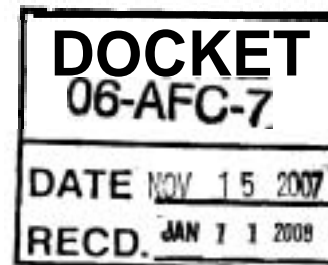
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November 15, 2007

Mr. Tom Luster  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219



**RE: CDP #E07-005, Humboldt Bay Power Plant**

Dear Mr. Luster:

On October 11, 2007 the California Coastal Commission (CCC) issued PG&E a Coastal Development Permit (#E-07-005) for the Site Decommissioning Preparatory Project (SDPP). This project consists of construction of office buildings, a parking area, and associated infrastructure to support decommissioning activities at the Humboldt Bay Power Plant.

As specified in the subject permit, PG&E is required to mitigate the direct and indirect effects to CCC defined wetlands in the SDPP project area by creating, restoring, and/or enhancing 1.2 acres of wetlands described as Areas MIT-2 and a portion of Area MIT-1 in the July 2007 Buhne Point Wetlands Preserve Mitigation and Monitoring Plan for Humboldt Bay Repowering Project (Wetland Plan), as applicable. PG&E is proposing to replace Area MIT-2 and a portion of Area MIT-1 with 1.2 acres in MIT-4.

Mitigation areas MIT-1 and MIT-2 are the areas of the plan which involve the creation of wetlands. These areas are needed to address mitigation requirements of other agencies for PG&E's Humboldt Bay Repowering Project. MIT-4 is a highly disturbed area which contains native and non-native riparian wetlands vegetation. Enhancement of 1.2 acres within this area would be appropriate mitigation for the loss of CCC defined wetland vegetation in the SDPP project area.

As specified in the Wetland Plan, the one-parameter method of wetland delineation used by the CCC refers to facultative hydrophytic vegetation only. The enhancement of MIT - 4 would remove non-native species that are not listed as wetland indicators. These non-native species, such as Spanish heather (*Erica lusitanica*), pampus grass (*Cortaderia selloana*), scotch broom (*Cytisus scoparius*), and cotoneaster (*Cotoneaster* sp.) occur in the MIT-4 wetlands likely because of past disturbances and accidental introduction from adjacent properties. Cover of native wetland species, such as Hooker's willow (*Salix hookeriana*), sitka spruce (*Picea sitchensis*), waxmyrtle (*Myrica californica*), slough sedge (*Carex obnupta*), and California blackberry (*Rubus ursinus*) can be increased and provide greater habitat value if the non-native horticultural species are reduced.

Mr. Tom Luster  
California Coastal Commission  
Page 2

This increase in positive wetland indicator species in a limited and important riparian habitat type will offset losses of non-native, facultative hydrophytic vegetation as a result of the SDPP project.

Thank you for your time and consideration of this issue. Should you have any questions regarding this issue, please contact Susan Strachan at **530-757-7038** or me at **805-595-6344**.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick W. Mullen". The signature is fluid and cursive, with a large initial "P" and "M".

Patrick W. Mullen  
Director, Government Relations - Generation