

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

12/11/20  
04:59 PM

Order Instituting Rulemaking to Implement  
Electric Utility Wildfire Mitigation Plans  
Pursuant to Senate Bill 901 (2018).

Rulemaking 18-10-007  
(Filed October 25, 2018)

**COMMENTS OF THE JOINT LOCAL GOVERNMENTS ON ADMINISTRATIVE LAW  
JUDGE'S RULING REQUESTING COMMENT ON CLOSING THIS PROCEEDING**

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Dated: December 11, 2020

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OF THE STATE OF CALIFORNIA**

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In accordance with the Administrative Law Judge's ruling requesting comment on closing this proceeding, the Counties of Napa and Sonoma, and the City of Santa Rosa (the Joint Local Governments), submit these comments. The ruling asks for parties' input on whether the proceeding should be closed, if there are any outstanding Phase II issues that should be addressed before closure, and other questions or recommendations. The Joint Local Governments have been experiencing significant problems with PG&E's vegetation management activities and we believe that PG&E's Wildfire Mitigation Plan is the appropriate vehicle for addressing the issue.

**I. COMMENTS**

The Joint Local Governments' fire departments and public works personnel have observed with increasing alarm that PG&E is leaving huge amounts of tree debris behind when it performs vegetation management work following wildfires; CalOES has also observed this problem and the Joint Local Governments are receiving increasing numbers of complaints from residents. The problematic debris is felled trees that have been cut into segments and are left on the ground to dry out and rot. The photographs from Napa County in Attachment A show the size of the tree debris and the magnitude of the problem it creates for property owners. The

attached letter from the City of Santa Rosa and Sonoma County asking PG&E to reinstate its Wildfire Wood Management Program also contains a number of photographs of the substantial tree debris left behind by PG&E following wildfire-related vegetation management work.<sup>1</sup>

These photographs, and the tree removal activities that are causing alarm for local governments and prompting complaints from residents, are from PG&E's vegetation management work following the LNU Lightning Complex and Glass Fires.<sup>2</sup> Until October of this year, PG&E had an existing program under which it removed felled trees from fire-impacted properties at the landowner's request. PG&E decided in late October to halt that program. Based on the scant information the Joint Local Governments have on PG&E's abrupt decision, it appears to have been financially motivated. The story that many landowners are being given, however, is that PG&E cannot legally remove the trees because they are the landowner's property. While it is true that trees are the property of the landowner and that PG&E cannot remove cut trees without permission, PG&E is using that fact to avoid addressing the increasingly large problem its vegetation management practices are creating. PG&E's claim that its hands are tied is particularly disingenuous given that PG&E *will* remove felled trees at the landowner's request under its Enhanced Vegetation Management and Tree Mortality and Drought Response programs.

PG&E's decision to stop removing felled trees from fire-impacted properties is unacceptable and creates real safety and wildfire risks. The Joint Local Governments request that, before closing this proceeding, the Commission direct PG&E to reinstate its program immediately.

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<sup>1</sup> Attachment B, City of Santa Rosa and Sonoma County Letter re: Reinstating Wood Management Program for PG&E Felled Trees in Fire-Impacted Areas (December 9, 2020)

<sup>2</sup> The amount of felled tree debris from the Glass Fire in St. Helena is some of the worst that Sonoma County's public works personnel have seen.

**A. PG&E Cancelled its Post-Fire Tree Debris Removal Program**

PG&E used to have an invaluable tree debris removal program for fire-impacted residents, but PG&E has apparently cancelled that program without any notice to the impacted communities or explanation of its decision. PG&E instituted a Wildfire Wood Management Program following the 2017 wildfires, which remained in effect for the 2018 Camp Fire; numerous fire-impacted residents of the City and Counties availed themselves of PG&E's program. In January 2018, PG&E pruned or felled approximately 30,000 hazard trees within the fire-impacted communities in Northern California to reduce wildfire and public safety risk; 10,600 of those trees were in Sonoma County's fire burn scar areas.<sup>3</sup> PG&E offered the Wildfire Wood Management Program as a no-cost opt-in resource for property owners. At the time PG&E introduced the program, PG&E's senior manager for its North Bay and Sonoma Divisions stated that the utility was committed to helping its customers recover from the catastrophic wildfires and was offering the wood removal service "to reduce wildfire risk created by hazard trees piling up, and to help ensure that customers can safely enjoy their property."<sup>4</sup> PG&E again offered the Wildfire Wood Management Program in April 2019 following the Camp Fire.

In October 2020, PG&E informed the Sonoma County/City of Santa Rosa Joint Debris Task Force that no Wildfire Wood Management Program would be available for Sonoma County residents, and that removal of wood over four inches in diameter felled by PG&E would be the sole responsibility of the parcel owner. When asked why PG&E discontinued its Wildfire Wood Management Program, PG&E responded by email that "in the past, PG&E has aided with some large debris removal during wildfire response on an ad hoc basis, however the only two formal and approved wood removal programs PG&E currently offers are through our Enhanced

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<sup>3</sup> Attachment B.

<sup>4</sup> *Ibid.*

Vegetation Management Program and our Tree Mortality and Drought Response." That response does not accurately characterize the program that the Joint Local Governments observed first-hand following two years of devastating wildfires. PG&E's about-face on post-fire tree debris removal appears to be based, at least in part, on the magnitude of the wildfire cleanup work in 2020. This justification was offered by a PG&E contractor to a Napa resident who asked why PG&E had removed felled tree debris from their property in the past but would not do so following the fire cleanup.<sup>5</sup> The Joint Local Governments submit that, if PG&E has the manpower to cut down fire-impacted trees in the first place, it has the manpower to remove the trees as well.

PG&E's change of heart about removing tree debris appears to have come in the midst of the utility's ongoing post-fire tree removal work, which reinforces the inference that the decision was motivated by the scope of the work and by PG&E's finances. A Napa County resident confirmed with the PG&E contractors who would be performing extensive post-fire vegetation management work on the resident's property that the contractors would remove all the felled trees; this discussion occurred during a number of planning conversations that occurred before the tree removal work started. A PG&E employee also confirmed that the felled trees would be removed. On October 29, the contractors—who were in the midst of the multi-day tree removal project on the resident's property—informed the resident that PG&E's corporate office issued a "new directive" to leave all wood behind. In the contractor's words, they "were done." When the resident protested that leaving the felled trees on the ground was not what the contractor and the resident had agreed on before the work started, the contractor said that things "had changed." Until the edict to cancel all tree removal came down from PG&E to its

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<sup>5</sup> Attachment C. Names and other identifying information have been redacted from the email.

contractors, the workers on this property were felling trees in a haphazard manner because they were planning to haul them away. Now the resident is left with a property full of badly-felled trees that impede other restoration activities.

PG&E's contractors have also informed residents that the Commission does not allow PG&E to remove felled trees from the property of a landowner.<sup>6</sup> While the Joint Local Governments are aware of past Commission decisions affirming that trees are the property of the landowner, we are not aware of any Commission-issued prohibition against tree removal at the landowner's request. To the contrary, the fact that PG&E instituted the Wildfire Wood Management Program to do exactly what it now claims it is legally precluded from doing means that PG&E is, in fact, able to remove tree debris. The fact that PG&E currently removes felled trees at the landowner's request under other vegetation management programs also makes PG&E's claim that it is legally precluded from removing fire-impacted trees laughable. PG&E's argument is further complicated by the fact that it is currently removing fire-impacted tree debris along public streets in Napa County, likely because of the liability risk associated with automobile accidents. It is clear that PG&E no longer *wants* to remove tree debris following wildfires, but that is irrelevant to whether PG&E *can* or *should* continue removing the trees it cuts down.

The Joint Local Governments do not find PG&E's excuses adequate or credible. PG&E is creating serious financial, logistical, and environmental problems for residents, local governments, and the State by leaving massive amounts of felled trees lying on the ground all over Northern California.

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<sup>6</sup> Attachment C.

**B. PG&E is Interfering with the State's Debris Removal Program**

PG&E's practice of leaving trees felled after fires lying on the ground is directly interfering with CalOES's wildfire debris management program. CalOES is in the midst of a two-phase wildfire recovery process: Phase 1 involves the removal of household hazardous waste, such as batteries, asbestos siding, propane tanks, and paint, that may pose a threat to human health, animals, and the environment; Phase 2 involves removal of the remaining structural ash and debris, and soil testing to ensure the site is clean, safe for rebuilding, and free of potentially leached toxins.<sup>7</sup> Phase 2 also includes the removal of fire-damaged hazard trees that are dead or likely to die within five years and present a threat to public rights-of-way and public infrastructure.<sup>8</sup> When PG&E's contractors cut down hazardous trees after a fire and leave them on the ground, the trees are no longer considered hazardous and are not eligible for removal under CalOES's program. That means that the task and cost of removal falls to local governments or private landowners. By cutting down trees and leaving them on the property for owners to deal with, PG&E is depriving the property owner of access to the public debris removal program. Sonoma and Santa Rosa have heard from residents who discovered that they were ineligible for the public program after PG&E cut down their trees, and the Joint Local Governments have received numerous complaints from residents whose property was essentially clear-cut by PG&E's contractors.

It is also important to note that many homeowners insurance policies exclude tree removal from debris removal coverage and only offer a nominal amount under separate policies.<sup>9</sup> When PG&E cuts down trees on fire-impacted properties, it creates significant financial

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<sup>7</sup> Attachment B.

<sup>8</sup> *Ibid.*

<sup>9</sup> *Ibid.*

obligations for property owners by foreclosing their ability to take advantage of the State's debris removal program and by forcing them to pay for debris removal out of insurance funds meant for rebuilding.<sup>10</sup> One Napa County resident has said that the cost of removing PG&E's felled trees from their property has made them consider selling instead of rebuilding.

PG&E is aware that its post-fire tree debris practices are interfering with the public debris removal program. Until recently, a PG&E representative attended the joint Sonoma/Santa Rosa Debris Task Force meetings, which are also attended by a representative from CalOES. The City called a special meeting on November 20, 2020, in response to PG&E's October 2020 announcement that its Wildfire Wood Management Program was no longer available; the November 20 meeting was attended by City and County representatives, CalOES, and a number of PG&E representatives.<sup>11</sup> PG&E provided an update that it had completed nearly all Priority 1 (greatest risk) tree removal from the Glass Fire and less than half of Priority 2 tree removal. PG&E did not respond directly to questions about whether it could factor the State's tree removal program into its Priority 2 tree work, but PG&E has not removed any Priority 2 trees in Santa Rosa since the issue of the State's program was raised. PG&E's response to the larger issue of coordinating with the State on debris removal and vegetation management best practices was that the utility supported future collaboration, including policy and legislative changes, but PG&E refused to answer direct questions about the problems its current practices are creating. Following that meeting, PG&E's representative also informed Santa Rosa and Sonoma that PG&E would not be participating regularly in Joint Debris Task Force meetings anymore but that they would be available to answer questions via email going forward.

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<sup>10</sup> Attachment B.

<sup>11</sup> *Ibid.*



The Joint Local Governments believe that PG&E's Wildfire Mitigation Plan should include the Wildfire Wood Management Program, and that PG&E should take the State's debris removal program into account when undertaking post-fire tree removal in the field.

**C. PG&E is Creating Environmental, Safety, and Fire Hazards**

PG&E is also aware that leaving felled trees on the ground creates safety and fire risks. PG&E's senior director for the North Bay and Sonoma Division stated exactly that when the Wildfire Wood Management Program was rolled out. And if history and common sense were not enough to make the hazards clear to PG&E, local governments and CalOES have told PG&E as much. During the November 20 meeting, the City and County raised the practical problems PG&E creates by leaving large amounts of felled tree debris on fire-impacted properties and on steep slopes. That practice creates safety hazards for individuals, can damage the underlying property, presents significant risks to the watershed, and is a serious fire hazard. CalOES took issue with PG&E's characterization of its post-fire tree cutting as "fire mitigation" work because leaving felled dead trees on the ground is not fire mitigation. PG&E stated that it has a post-work inspection process to ensure that tree debris is not left on steep slopes, but Sonoma County has still observed instances where it happens. Santa Rosa and Sonoma reiterated the safety and fire risks created by leaving felled trees on the ground in their December 9 joint letter to PG&E asking that the Wildfire Wood Management Program be reinstated.<sup>12</sup> And Santa Rosa understands that 11 other counties have expressed similar concerns with PG&E's post-fire tree removal practices.

PG&E's one-page informational handout on its post-fire tree removal practices states that "[i]n some areas, tree crews will lop and scatter wood debris in accordance with [CAL

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<sup>12</sup> Attachment B.

FIRE] Forest Practice Rules to avoid excessive vegetation build-up."<sup>13</sup> PG&E provides no insight into the circumstances that justify scattering felled tree debris according to CAL FIRE's best practices, or why forestry management practices will only be followed on occasion. The photos from Santa Rosa and Napa do not appear to be instances where the felled trees were scattered according to CAL FIRE best practices, and the volume of dead wood in those photos illustrates both the magnitude of the problem PG&E is leaving for landowners and the potential fire, erosion, and safety risks.

**D. PG&E's Use of Third-Party Contractors Creates Oversight and Quality Control Problems**

In addition to the problems inherent in PG&E's post-fire tree removal policies and practices, the fact that PG&E uses third-party contractors for its vegetation management work creates problems with oversight, consistency, and accountability. The Joint Local Governments have observed inconsistent practices and policy enforcement across the various PG&E contractors that work in their jurisdictions, and have seen first-hand that PG&E is limited in its ability to know what is happening on the ground. Napa in particular has a long history of PG&E contractors not adhering to best practices—or basic sanitation—in the field.<sup>14</sup> And while PG&E has been responsive to Napa's concerns about problematic contractors, it does not appear that PG&E has the level of oversight and control over its contractors that the situation demands, given the magnitude and importance of the work being done.<sup>15</sup> PG&E's use of contractors also makes it difficult for impacted communities and customers to get clear answers, escalate issues,

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<sup>13</sup> Attachment D.

<sup>14</sup> See, e.g., A.18-12-009, Response of the County of Napa and the County of Sonoma to A.18-12-009, pp. 4–5 (January 17, 2019); R.18-10-007, Comments of the Counties of Mendocino, Napa, and Sonoma, and the City of Santa Rosa on PG&E's Wildfire Mitigation Plan, pp. 11–12 (March 13, 2019).

<sup>15</sup> Additionally, the federal monitor's recent discoveries regarding PG&E's vegetation management shortcomings and reporting irregularities support the conclusion that PG&E does not have a tight enough grip on its vegetation management program.

or resolve problems.

And there are a lot of problems. The following are a sample of experiences Napa County's residents have had with PG&E's contractors performing post-fire tree removal in October 2020:

- Crews working on large jobs only appear intermittently, coming for one or two days, then not showing up for the next two or three days, and repeating the cycle until the work is eventually done. Crews also regularly fail to show up on the scheduled first day of a project. This not only a general inconvenience, but in one resident's case it has prevented restoration of water and power to the house;
- Crews fell trees and leave the logs without regard to the underlying property, which has caused blocked driveways, broken water lines, broken fences and retaining walls, and blocked access to entire portions of the property;
- Crews often do not have contact information for property owners, which means they do not provide notice of upcoming work, discuss the timing and logistics of the work, or otherwise communicate with the owner;
- Crews do not always have a comprehensive understanding of, or plan for, the tree removal work on a particular property. Residents have observed contractor confusion over how the trees were marked, crews have failed to remove trees they were supposed to, crews return repeatedly to properties to mark new trees, and crews are unable to articulate consistent policies about why they are removing certain trees or debris but not others;

- Crews clear-cut some properties without notifying or discussing the scope of planned work with the owner;
- The crews' heavy machinery has destroyed hardscaping, water lines, and other property infrastructure; and
- One contractor told a resident “that’s your problem, not ours,” when the resident asked if the contractor would remove the felled trees.

The Joint Local Governments hear stories just like these from their residents all the time. The callous indifference of PG&E and its contractors to the serious problems they are creating is a now-familiar refrain. While the Commission cannot practicably change the quality of work PG&E’s contractors are doing in the field—that responsibility lies with PG&E and its contractors—the Commission can ensure that PG&E at least removes the trees it cuts down as part of its post-fire vegetation management work.

**E. PG&E's Vegetation Management Practices Must Be Improved**

PG&E has given a poor account of itself on the issue of post-fire tree removal. PG&E made what appears to be a mid-stream financial decision to cancel its Wildfire Wood Management Program and is now willfully ignoring the fact that leaving huge amounts of dead trees on the ground creates safety, environmental, and fire hazards. PG&E does not have a clear enough picture of what its contractors are actually doing in the field—or if it does, it is showing an inexcusable level of indifference. PG&E's contractors are not consistently adhering to forest management best practices, and it does not appear that PG&E has made those best practices a priority. And PG&E is trying to hide behind the Commission’s skirts by claiming that its hands are tied and it is helpless to remove the trees it cut down.

PG&E has a massive service territory and a massive amount of work to improve

its electrical system and mitigate the risk that it will cause yet another catastrophic wildfire. The Joint Local Governments are not indifferent to the size and difficulty of the task PG&E is undertaking. But the fact that PG&E has a huge service territory and a big job to do cannot justify PG&E saddling local residents with the cost of removing large tree trunks while many are already struggling to rebuild their homes. Wildfire prevention is crucial—as the Joint Local Governments know all too well—but it does not give PG&E *carte blanche* to treat its wildfire mitigation targets as an endpoint to be reached by any means necessary.

Given the size of PG&E's service territory and the magnitude of vegetation management work the utility has to undertake in the coming years, the issue of PG&E leaving behind substantial amounts of tree debris is likely to become more pressing and widespread. The Joint Local Governments believe that it is possible to reach a workable solution, which may be as simple as the Commission directing PG&E to reinstate its Wildfire Wood Management Program and clarifying that the utility can record its costs in one of its many wildfire-related memorandum accounts. But based on PG&E's unwillingness to acknowledge the problems it is creating and its disingenuous insistence that it is helpless to perform work that it freely performed for the last two years—and is currently performing under other programs and along roadsides—the Joint Local Governments believe that Commission involvement is necessary to ensure that PG&E does the right thing.

## **II. CONCLUSION**

The Joint Local Governments respectfully request that the Commission leave this proceeding open to address the ongoing problems with PG&E's vegetation management practices. PG&E has acknowledged in the past that its post-fire tree removal practices constitute wildfire mitigation, which brings them under PG&E's Wildfire Mitigation Plan. Alternatively, if the Commission believes the issue is best addressed in a different forum, the Joint Local

Governments ask that the Commission provide direction on the manner and proceeding in which PG&E's tree removal practices should be examined. This issue must, however, be addressed.

Respectfully submitted December 11, 2020, at San Francisco, California.

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Megan Somogyi

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## **ATTACHMENT A**















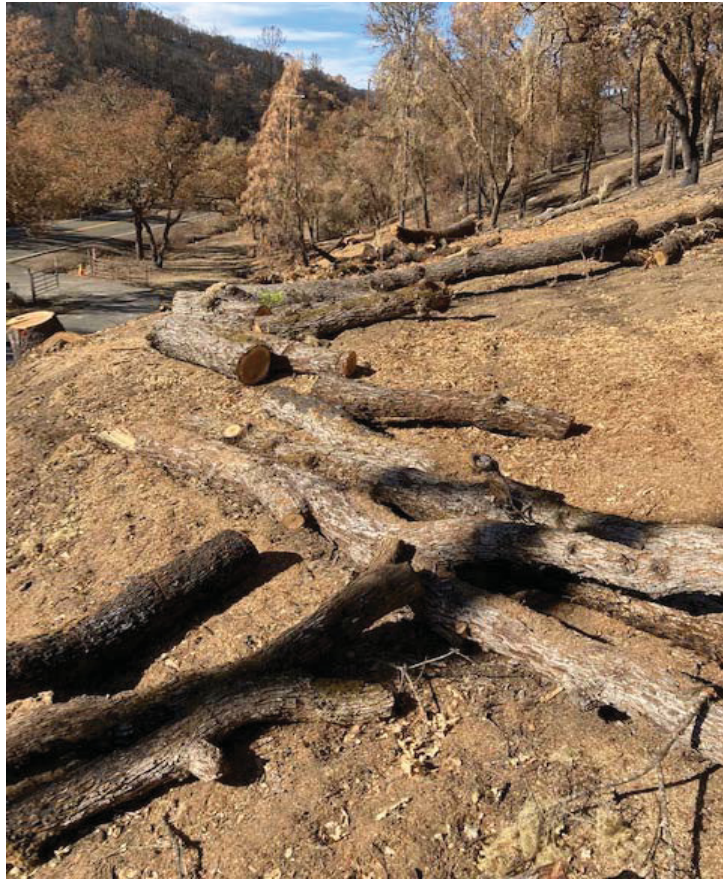












## **ATTACHMENT B**





December 9, 2020

Bill Smith, CEO  
Pacific Gas & Electric Company

**Re: Reinstitute Wood Management Program for PG&E Felled Trees in Fire-Impacted Areas**

Dear Mr. Smith:

As the Sonoma County Administrator and the Santa Rosa City Manager, we are requesting PG&E reconsider its responsibility to offer assistance to property owners in the removal of trees felled by PG&E and left on properties, which has created additional burdens for fire survivors and new fire-fuel hazards within the Sonoma County wildfire burn areas.

This letter follows up on the November 20, 2020 meeting attended by the City of Santa Rosa (City), County of Sonoma (County), California Governor's Office of Emergency Services (Cal OES), and Pacific Gas & Electric (PG&E) to discuss the status of PG&E's Wildfire Wood Management Program. The meeting was organized in response to questions raised regarding PG&E felled trees during the County of Sonoma and City of Santa Rosa Joint Debris Task Force meetings. In October 2020, PG&E advised the City/County Joint Debris Task Force that there would not be a Wildfire Wood Management Program available for Sonoma County residents and the removal of wood over four inches in diameter and felled by PG&E would be entirely the responsibility of the parcel owner. As of December 2, 2020, PG&E reported that 99.9% of approximately 5,400 Priority 1 trees and roughly half of the 9,000 Priority 2 trees in the Glass Fire have been felled.

The City and County are working in partnership with Cal OES to support the community through the recovery process, which includes two phases. Phase 1 is the removal of household hazardous waste (HHW) that may pose a threat to human health, animals, and the environment such as batteries, asbestos siding, propane tanks, and paints. Phase 2 is the removal of the remaining structural ash and debris as well as soil testing to ensure the site is clean, safe for rebuilding, and free of potentially leached toxins. Phase 2 also includes the removal of fire-damaged hazard trees that are dead or likely to die within five years as a result of the fire as determined by a certified arborist and present a threat to the public Right of Way (ROW), i.e. roadways, and/or public infrastructure, fire hydrants, water meters, etc. The eligible hazard trees would be included in the State's Phase 2 program and removed through the Right of Entry (ROE) process.

Cal OES has determined that trees felled by PG&E that would have been included in the State's Phase 2 program are no longer eligible for inclusion in the program as the trees no longer present a threat. Therefore, trees felled by PG&E are ineligible for removal by the State, and wood over four inches in diameter and felled by PG&E, regardless of Phase 2 eligibility, is the responsibility of the parcel owner.

**The City and County believe that the position of PG&E is in conflict with PG&E's local past practice.**

In January of 2018, in response to the 2017 Northern California Wildfires, PG&E pruned or felled approximately 30,000 hazard trees within the fire-impacted communities in Northern California to reduce wildfire and public safety risk – 10,600 of those trees were in Sonoma County's fire burn scar areas. To aid property owners with the removal of larger wood that they had felled, PG&E offered an "opt in" Wildfire



Wood Management Program at no cost to property owners throughout northern California burn areas. At the time of the program rollout, Dave Canny, senior manager of PG&E's North Bay and Sonoma Divisions stated, "We are committed to helping our customers recover from the devastating wildfires last fall. We're offering this wood removal service to reduce wildfire risk created by hazard trees piling up, and to help ensure that customers can safely enjoy their property." Additionally, in April of 2019, in response to customer and local government feedback, PG&E announced a streamlined process for no-cost wood debris removal on private property for trees the company felled in the Camp Fire burn area.

Our agencies continue to work tirelessly to increase the resiliency of our community to effectively respond to future wildfires. Local fire officials wholeheartedly agree with PG&E's past acknowledgement that removing felled trees reduces wildfire risk. We also understand the burden fire survivors face as they recover from devastating loss, rebuild their homes, and/or prepare their burned properties for winter and new types of post-fire weather hazards. Fire survivors should not also have to take on the burden of removing trees felled by PG&E if they do not wish to or have the means to. Many homeowners' insurance policies exclude tree removal from debris removal coverage, and instead offer a nominal amount under a separate coverage. By felling these hazard trees, PG&E has also taken away these property owners' eligibility to have the trees removed through the state debris removal program where there would have been no out of pocket cost to the homeowner. Those who lost homes in the fires are forced to use funds from their rebuild coverages for the removal costs of these felled trees.

In the interest of public safety and to rightfully support fire survivor's ability to rebuild in our community, we respectfully request PG&E to reconsider their responsibility in the removal of this fire-fuel hazard in Sonoma County burn areas. These property owners have a long road ahead of them and reinstituting PG&E's Wildfire Wood Management Program could ease some of their challenges during a difficult recovery. We also request that PG&E coordinate their future efforts with Cal OES to ensure residents are not burdened with the cost of wood removal that could have been included in a State-managed Phase 2 Debris Removal Program.

Thank you for your continued support of our community's recovery from the devastating impacts of wildfire disasters.

Respectfully,



Sheryl Bratton  
County Administrator, County of Sonoma



Sean McGlynn  
City Manager, City of Santa Rosa

Attachment: Photos of PG&E felled trees left on properties

CC:

The Honorable Mike Thompson, United States Congress  
The Honorable Jared Huffman, United States Congress  
The Honorable Kamala Harris, United States Senate  
The Honorable Dianne Feinstein, United States Senate  
The Honorable Mike McGuire, California State Senate  
The Honorable Bill Dodd, California State Senate  
The Honorable Marc Levine, California State Assembly  
The Honorable Jim Wood, California State Assembly  
The Honorable Cecilia Aguiar-Curry, California State Assembly

Sonoma County Board of Supervisors

Santa Rosa City Council

Amber Lane, Inland Branch Director – 2020 Statewide Wildfire Recovery Operations, Cal OES

Paul Schlesinger, Alcalde & Fay

Kyriakos Pagonis, MMO Partners

Paul Yoder and Karen Lange, Shaw Yoder Antwih Schmelzer & Lange, Inc.

Kyra Emanuels Ross & David Jones, Emanuels Jones & Associates

Melinda Rivera, PG&E Local Government Affairs Representative —Lake and Sonoma Counties



Photos showing some examples of where PG&E felled trees have been left on properties in wildfire-impacted areas





Photos showing some examples of where PG&E felled trees have been left on properties in wildfire-impacted areas



## **ATTACHMENT C**

## MSomogyi

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**From:** MSomogyi  
**Sent:** Tuesday, December 8, 2020 3:36 PM  
**To:** MSomogyi  
**Subject:** FW: [REDACTED] Post-fire tree work and logs/wood remains

**From:** [REDACTED]  
**Date:** November 6, 2020 at 11:50:34 AM PST  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** [REDACTED] Post-fire tree work and logs/wood remains

Hello [REDACTED],

This is to respond to your email below, which [REDACTED] forwarded to me.

First, let me thank you for working with our folks on the post-fire tree work, which is necessary to ensure safety, and avoid outages and possible fires.

I can understand your confusion if logs were removed on a past job last year, and not with this current post-fire work. However, the post-fire work is completely different in scope and scale than the previous work done. PG&E's response to the numerous, large fires in CA has resulted in many tens-of-thousands of trees we have had to inspect and work. It would be cost prohibitive, and not allowed by the CPUC, for PG&E to clear all logs and wood off property for this large a volume of trees; it's just not reasonable. The work done by PG&E and its contractors in removing trees meets USFS guidelines, Cal Fire requirements, OSHA and Industry Standards. Our work includes chipping brush and small-medium limbs, and scattering the chips; this helps property owners avoid this cost, and the brush clearing abates a possible fire hazard; it also helps with erosion control. We also ensure that logs are left positioned in a safe manner; e.g., not on roads, or where they could roll down a hill.

PG&E has a legal easement/right-of-way for access and work on and around PG&E poles, attachments and lines on your property. We are legally mandated by the State of California to ensure clearance and protection of our facilities. As such, we are required to clear any trees that present a threat, which can fail and strike the power lines or equipment. Our legal land rights do not require removing logs or wood from the trees that we work. The property owner has legal ownership of this wood, and it is their responsibility.

Based on my review of the work done, I believe that our position of not removing logs is reasonable. Thank you for your time and patience in working with us to review this matter.

--

[REDACTED]

*Customer Liaison*

*Clear Path Utility Solutions/PG&E Support*

[REDACTED]

[REDACTED]

## **ATTACHMENT D**





# Vegetation Management

## Addressing Hazard Trees in Areas Impacted by Wildfires

October 2020

### Information on Hazard Tree Removals for Customers Impacted by Wildfires

Pacific Gas and Electric Company (PG&E) is working safely and as quickly as possible to perform damage assessments and make repairs to our electric equipment and facilities impacted by recent wildfires. We are looking at every option to restore power to all customers as soon as possible.

As part of this restoration work, **PG&E contract crews are conducting inspections to identify and address hazardous trees that may have been damaged by the fire, where it is safe to do so.** These trees must be removed for crews to access equipment, assess damage and restore power.

### What Customers Can Expect

We recognize that this tree work may be impactful. Customers can expect the following:

- ✓ **Hazardous trees will be marked** to identify them for work.
- ✓ We will reach out to **notify property owners who may be impacted by this critical work.**
- ✓ Wood from this work cannot be removed by PG&E since **trees are considered assets and property that legally belong to the property owner.** However, at the property owner's request, we will chip smaller limbs and can spread the chips on site.
- ✓ In some areas, tree crews will **lop and scatter wood debris in accordance with California Department of Forestry and Fire Protection Forest Practice Rules** to avoid excessive vegetation build-up.



This work is critical to address potential safety hazards and wildfire risks for residents and our employees. Federal and state regulations also require us to remove hazard trees along high-voltage power lines. Customers with questions or concerns about this work can contact us at **1-800-743-5000**.

### Learn More

For more information about PG&E's vegetation management program, visit [pge.com/trees](https://pge.com/trees).