



October 31, 2022

Patricia K. Poppe
Chief Executive Officer
Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105

RE: PG&E Vegetation Management Practices

Dear Ms. Poppe:

On behalf of the Rural County Representatives of California (RCRC) and the California State Association of Counties (CSAC), we write to (1) request your assistance; (2) convey the grave concerns many of our counties and their residents have expressed about PG&E's vegetation management programs; and, (3) articulate the public safety and wildfire risks created by leaving the felled wood in place.

We appreciate your sincere desire for PG&E to earn back trust from its customers. We strongly support that objective. But we fear PG&E's repeated and widespread refusal to haul away trees cut down during utility vegetation management operations is undermining that effort. We strongly urge you to:

- Immediately begin removing felled wood where requested by the property owner.
- Remove felled wood and wood chips deeper than 4" within 100' of structures.
- Designate representatives whom property owners and local leaders can contact for removal of felled wood.
- Resolve widespread inconsistencies among contractors.
- Improve transparency and accountability among the different vegetation management programs.
- Discontinue misrepresenting public agency roles, responsibilities, and resources.
- Convene a meeting between impacted counties, you, and PG&E's regional Vice Presidents to develop an actionable—and equitable—pathway forward.

Having suffered massive destruction caused year over year by catastrophic wildfires, we understand PG&E's pressing need to step up vegetation management operations to avoid wildfires and reduce the risk of power outages. Unfortunately, PG&E's refusal to remove felled wood is impairing public safety, increasing fuel loads, compromising property

owners' efforts to create and maintain defensible space, and imposing heavy financial burdens on property owners to abate these hazards created by PG&E.

Given the lack of success in these conversations thus far, we resort to asking you to exert your leadership to bring PG&E's contractors, customers, and local elected officials to the table and resolve these issues. We know the challenges PG&E faces in meeting the pace and scale of its vegetation management objectives, but PG&E must do better and be a better neighbor.

PG&E has traditionally removed felled wood cut under its enhanced vegetation management, tree mortality and drought response, and wildfire wood management programs. We were disappointed and alarmed to learn of PG&E's abrupt about-face and refusal to continue removing felled wood. More than a dozen counties have expressed concerns about this course change and the dangers and burdens it creates. This course change is even more confusing considering PG&E's prior acknowledgement that wood removal is intended "to reduce wildfire risk created by hazard trees piling up" and that, "dead wood constitutes fuel on the ground that not only can catch fire, but also compromises firefighter safety."

Felled logs left in place can create a host of safety risks for property owners, firefighting personnel, and communities. As felled trees dry out, they increase the fuel load, thereby exacerbating the risk and severity of wildfires. These concerns are heightened when the trees are felled and left within the 100' defensible space perimeter that property owners are required to maintain. In some cases, property owners who passed defensible space inspections reportedly failed subsequent inspections as a result of trees cut down and left in place by PG&E vegetation management crews. Other risks include trees rolling down slopes into roads, thereby impeding emergency access and egress as well as normal traffic flow. Furthermore, the scattered distribution of felled trees can impede future firefighting efforts. Simply speaking, it is inappropriate for PG&E to externalize risks, costs, and mitigation obligations to property owners for actions it undertakes in the course of providing electric service.

Our counties have repeatedly tried to resolve this issue through normal channels of communication – to no avail. Local PG&E representatives recently presented at Boards of Supervisors meetings throughout your service territory. During those presentations, many elected officials expressed their deep frustration with PG&E's vegetation management programs and the lack of a clear plan for - or commitment to – removal of felled wood as requested by the property owner.

While we appreciate PG&E's concern for landowner's rights to the felled timber, it is often extremely expensive (if not impossible) for the landowner to remove the material after your contractors leave their property. Where crews formerly stacked felled wood in a single location on a property, now contractors often leave the tree where it fell and cut it into unmerchantable 5' or 6' sections. When merchantable (8' length or greater) timber

exists, the value of those materials may help offset some of the removal costs. Unfortunately, most trees were cut into unmerchantable lengths, thereby preventing PG&E and landowners from offsetting tree removal costs and often impeding a homeowner's ability to treat or consume it in the process.

We are also concerned about the misleading and sometimes threatening communications provided to customers about felled wood removal. In some cases, the contractors cutting down trees have told customers that felled wood will be hauled away by another crew at a later date. Months later, the hauling crew still hasn't shown up. There are other cases where property owners who "checked the box" on PG&E's form requesting that felled wood be removed are still waiting for the wood to be hauled away seven months later. In at least one case, this problem is compounded by the fact that the contractor left the wood on his neighbor's property. Even more frustrating for local governments, some contractors have told property owners that P&E will not haul away felled wood, but that the county itself provides that service. This is categorically untrue.

Because of inadequate communication by contractors and contractor reliance on tablets instead of printed materials, impacted property owners often do not know who to contact about problems or who even performed the work on their properties. When property owners reach out to PG&E, the results are often unsatisfactory and, in some cases, unsettling. In at least one case when a property owner attempted to resolve problems by directly requesting PG&E to remove felled wood, PG&E's representative shifted blame and responsibility for cleanup to the property owner and reportedly reminded the property owner that CAL FIRE would be around to do defensible space inspections.

Maintenance of defensible space is a large and expensive enough undertaking for many property owners even without adding costs imposed by PG&E's vegetation management actions. In many cases, large trees were cut down and left within a home's defensible space perimeter. Those customers were told "it's their problem" and that PG&E is not responsible for mitigating or fixing the nuisance and safety risks it creates. Many of these property owners had been in compliance with the state's defensible space laws until PG&E's contractors began working on their properties. Utilities cannot create additional burdens for maintenance of defensible space. *Under no circumstances can contractors be allowed to leave felled wood or accumulated wood chips within the 100' defensible space perimeter around structures.*

Other landowners have had several dozen trees felled by PG&E on small parcels, thereby creating tremendous fuel loads as those trunks and limbs dry out over time. In other cases, we have heard of customers whose property was damaged by contractors' equipment. These are burdens property owners – often on fixed incomes – cannot realistically afford to shoulder.

We look forward to your leadership and assistance to ensure that PG&E is a good neighbor to its customers. As noted above, we strongly urge PG&E to:

- Immediately begin efforts to remove felled wood where requested by the property owner.
- Remove all felled wood and wood chips deeper than 4" within 100' of structures.
- Designate specific representatives whom property owners and local leaders can contact for removal of felled wood. Those individuals must be empowered to quickly and successfully resolve disputes that may arise.
- Resolve widespread inconsistencies with contractors for greater quality control outcomes on the ground.
- Utilize a single, consolidated form at the customer level for greater transparency among PG&E's various vegetation management programs.
- Discontinue misrepresenting public agency roles, responsibilities, and resources.
- Direct PG&E regional Vice Presidents to convene a meeting with impacted counties to develop an actionable—and equitable—pathway forward.

Finally, we urge PG&E to track costs associated with tree removal actions and believe those costs should be recoverable through formal regulatory proceedings.

Sincerely,



Mary-Ann Warmerdam
Senior Vice President Governmental Affairs



Jacqueline Wong-Hernandez
Deputy Executive Director, Legislative Affairs

cc: Ronald Richardson, Vice President, North Coast Region, PG&E
Joe Wilson, Vice President, North Valley & Sierra Region, PG&E
Joshua Simes, Vice President, Central Valley Region, PG&E
Alice Busching Reynolds, President, California Public Utilities Commission
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Genevieve Shiroma, Commissioner, California Public Utilities Commission
Darcie Houck, Commissioner, California Public Utilities Commission
John Reynolds, Commissioner, California Public Utilities Commission
Caroline Thomas Jacobs, Director, California Office of Energy Infrastructure
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