

TO: Tom Smith & Corey Peters, PG&E

FROM: Tom Infusino, Calaveras Planning Coalition

RE: PG&E's Treatments to Create Fire Safety Zones around Power Lines in Extreme Fire Risk areas.

DATE: 5/16/18

## **I. Introduction**

The Calaveras Planning Coalition (CPC) is providing the recommendations below following a three-hour meeting and field trip with PG&E staff in the Arnold area on Wednesday, May 9, 2018. At this time, the CPC neither endorses nor opposes the proposed PG&E program to treat fuels in extreme fire risk areas. We hope that PG&E will follow our recommendations below so that the proposed program will have the least harm and the most benefit to the people and communities of Calaveras County.

## **II. Recommendations**

### **A) Outreach to the community first.**

Meet with the road associations, homeowners associations, and local community groups before putting the program on the ground. Help people to understand why they should help PG&E to treat the vegetation on their property in a fashion so dramatically different than PG&E has in the past. Make sure people understand that parts of the program are voluntary, and that they have options from which to choose. Make sure people realize that PG&E is requesting to create MORE wire clearance than required by the California Public Utilities Commission. If herbicides could be used in the future to control regrowth under cleared areas, make sure people understand that.

### **B) Share information with your partners.**

PG&E's Community Wildfire Safety Program information sheet talks about "working together" in "partnership with our customers." If PG&E really wants to "work together" in "partnership" with landowners, then PG&E should disclose PG&E's environmental reviews and risk management studies associated with this program. People should be given clear explanations of why this expanded treatment is considered necessary. Given some peoples' past bad

experiences with PG&E, many people may not accept the word of PG&E's public relations staff, unless it is accompanied by supporting documentation.

Also, disclose amounts of funding available for undergrounding lines and other community fire safety features. Also, PG&E should accept and review information provided by local people regarding nest areas, sensitive habitats, and scenic highways that may need special treatment.

If PG&E is unwilling to share information, it will be considered less of a "partner", and more like an adversary in negotiations. If PG&E takes a defensive and adversarial position, it will hamper the ability of the program to get consent from landowners.

### **C) Validate your assumptions.**

Mr. Smith indicated that the transmission lines are equipped with automatic switches that shut the system off after the first arch when a line hits the ground after being struck by a falling tree limb or trunk. Under those conditions, it is assumed that having pavement, bare ground, grass or ground cover under a foot tall beneath the power lines is better than having a bush under four feet high, or a tree under 8-feet high.

However, where I live in Amador County, in a subdivision approved in 1955, the power lines were struck by a branch weighed down by snow about five years ago. The lines arched, blazed, and extinguished intermittently for five hours until PG&E was able to arrive and switch off the system manually. The lines were either not equipped for automatic shut off, or the automatic shut off did not function.

If the safety assumptions in the risk analysis do not apply to part of the area, consider re-evaluating the risk to conform to the conditions of the system as it exists on the ground.

### **D) Retrofit as needed.**

Take the opportunity improve fire safety in these communities in ways other than just vegetation removal. In the example above, if an electrical distribution system need to be retrofitted with modern fire safety features, please do so. If some lines are good candidates for being replaced with "tree wire", please consider that as well. If some lines should be

undergrounded, consider that as well. Use these community inspections as more than just a means of identifying vegetation to remove for fire safety. Identify changes to the electrical distribution system that could improve community fire safety. Landowners are more likely to do what they can for fire safety, if PG&E is also making an effort to do what the landowners cannot.

**E) Put it in writing.**

It is absolutely critical that the details of people's rights and obligations are spelled out in writing; and that the prescription and options that PG&E seek to implement are spelled out in detail. There is NO reason to expect that a single spoken explanation will suffice. Diagrams and pictures are also recommended. People need to know what they have to accept in the easement, and what they can say no to outside the easement. People need to know what PG&E will remove in its easement and beyond.

PG&E must not rely on paperwork from prior different projects for use in this projects. Provide detailed and updated information specific to this project. PG&E would be wise to send out drafts of those new project materials to some HOA's and community groups to review prior to finalizing those documents.

**F) Make clear markings and record them in photographs.**

It appears that contractors are marking areas for removal with some ribbons on some trees some distance from the poles, rather than marking individual trees for removal. Also, contractors are marking leave trees with ribbons, but not "butt" marks that would survive accidental removal of the tree. Also, previous marks from previous treatments remain on the trees. These can confuse people (contractors and landowners alike) regarding the treatment that is being proposed now.

While we acknowledge that these are traditional methods used for marking trees in private and public land timber operations, they may not be easily understood by the general public. Also, they may not be appropriate in a neighborhood setting. Remember, should mistakes be made under these circumstances, they will not be limited to the inadvertent removal of a commodity

from some isolated parcel in the forest, they will harm the property value of an angry PG&E customer who will view the damage for decades, and tell people about it.

We encourage PG&E contractors to take photographs of the marks so that there is some evidence of what was agreed to that will survive the treatment. We encourage PG&E to employ more obvious marking of trees to be removed and trimmed, so that there are fewer misunderstandings. We encourage PG&E to mark leave trees along roadways with more than just a ribbon that could easily be removed by a mischievous pedestrian.

#### **G) Notify homeowners of work days.**

Please notify people when the work is going to be done on their property. This gives them the opportunity to be present to answer questions, if that is safe under the circumstances. It gives them the chance to remove vehicles from the path of work should that be needed or desirable. In some circumstances, people may need to vacate the buildings on site during the work for safety reasons. Please notify people when roads will be closed due to tree removal and crane operations. Where I live in Amador County, while trimming crews have come and done work without notice on days in the past; that work was limited, quick and safe. In this program, in some areas, the amount of work being done on trees of great length, girth, and mass suggests the need for more effective notice to residents.

#### **H) Clean up your debris, including stumps.**

The population in Calaveras County is older and more working class than the average in California. Many of these people were raised with blue collar values. Among these values is that a job is not done until after you clean up the mess, and that you leave a place looking better than you found it.

Forest Service and private timber operations often leave the ground scarred with tractor and tire tracks, the land littered with slash, the forest pocked with stumps, and the roads covered in dirt. This will not be acceptable in small-lot rural subdivisions. Remove the vegetative debris **at the same time** that it is cut. Do not have one crew cut the trees and brush one day, and a second crew come back to try to clean up the mess weeks later. People do not want fresh cut

conifers attracting pine bark beetles that will later attack the remaining live trees on their property. Please remove the stumps. Please rake lands smooth again after treatment. Please remove dirt from the roadways. Please repair damage to the road bed and pavement made by your operations.

**I) Replant ASAP.**

With the exception of hydroseeding on slopes with a potential for erosion, at this time, no part of this program includes effort by PG&E to replace the removed vegetation with vegetation that is suitable for growing under the lines, or that will retard the growth of undesirable vegetation below the lines. Another PG&E program may deal with herbiciding, mowing, or using integrated vegetation management to address this issue in the future.

It would be a mistake for this program to leave its success or failure in the hands of an as yet undescribed and unfunded separate program. Such programs may not materialize as future disasters in other areas divert PG&E resources to other safety projects in other areas. For example, PG&E may realize that fire safety efforts in more densely populated Tier 2 areas protect more people for the money, and therefore shift their efforts to those areas. Even short delays in replacing vegetation are enough to let vegetation incompatible with power lines re-establish on freshly disturbed soil that is open to sunlight and lacking in competing vegetation.

In addition, property owners view PG&E as one company, not as an amalgamation of separate programs with separate responsibilities. Property owners view their land as where they live every day, not as a treatment area for multiple prescriptions for various PG&E vegetation management programs over the years. Property owners do not care if one PG&E program successfully removed the bad vegetation, but another program failed to put in the good vegetation. That excuse will not impress them. To property owners, PG&E either does a good job from beginning to end, or it does a bad job; end of story.

**J) Begin where it is easiest to demonstrate success.**

As explained below, the Tier 3 extreme fire area in Calaveras County covers different vegetation types, different weather conditions, and different parcel types. In small-lot residential

subdivisions, where expensive homes have minimum setbacks from roadways, and PG&E lines parallel the roadways, in forests with towering old conifers, subject to snow storms in winter and high winds the rest of the year; PG&E's desire to remove vegetation, including century old trees and valuable landscaping, from one-foot above the ground to the heavens, along a 30-foot swath centered around their distribution poles, will be a hard program to sell. This is in part because of peoples' past negative experiences with PG&E's vegetation management programs. In some past programs, some people have complained to PG&E of poor notice, vague paperwork, and ineffective cleanup efforts. Other people may not bother to complain to PG&E, but instead spread bad publicity about PG&E to their neighbors.

On the other hand, it might be easier for PG&E to begin its Tier 3 fire safety operations in vegetation types and parcel types where the program will be less controversial. For example, in oak savanna on the western edge of the county, on large ranches; most of the removal will involve taking out brush under the lines on grazing land. This should be easy to get permission for, and easy to implement without incident. Similarly, on large isolated parcels of industrial timber lands, owners are less likely to be concerned about the aesthetics of the operations.

After a year of such successful operations, PG&E may restore people's faith in their effectiveness, and restore trust in the value of PG&E's word. Also, PG&E will have a year's worth of before and after photos that they can show other communities in year 2 and 3 of the program, to help reduce skepticism.

### **K) Raise up the Community**

As explained below, the homes and landscapes people enjoy in Calaveras County have experienced great losses over the last decade due to economic declines, drought, disease, and fire. PG&E could, under the banner of fire safety, take even more from these communities and their landscapes, and then go home. That would be just another tragedy, in a long history of tragedies. In Calaveras County, people have decades of experience with entities who tried to do the right thing in the wrong way.

However, PG&E could instead use this fire safety program as a means to uplift these communities.

For example, some of the brush and tree work could be contracted to the CHIPS program (Calaveras Healthy Impact Product Solutions - <http://www.calaveraschips.org/>), which employs local people to do such work in our forests and communities.

For example, local charities like the Do Wooders of Chapel of the Pines in Calaveras County, and Saint Katherine Drexel Parish in Amador County, have programs that collect firewood for distribution to the needy. PG&E could work with these charities to supply them with some of the wood from the fire safety program.

For example, PG&E could hand out \$100 – 200 gift certificates for approved plants at local nurseries to homeowners who have major portions of their front yards denuded by the fire safety program. This would help people to replace the beauty on their landscape, would help the local economy, and would also put in approved plants under the lines to facilitate PG&E's future management.

For example, during the school year, PG&E could work with the local high schools to recruit community service volunteers to help replant yards for senior citizens. (High School students in Calaveras County have a community service requirement.) In the early summer, PG&E could hire some local youths to help replant yards for senior citizens. This would help the property owners replace the beauty to their yards, help students get their community service credit, and put in approved plants under the lines to facilitate PG&E's future management.

For example, PG&E could work with the Master Gardeners who have monthly garden classes for the general public. The Master Gardeners could do a class on how to landscape plan, plant, grow and irrigate plants on PG&E's list of plants approved for growing under power lines.

For example, when removing trees that have the address number of the home on them, contractors could immediately place the number on a metal stake for the homeowner, so that vegetation treatment and emergency crews can locate the property.

When people have lost shade trees, provide compensation for the purchase of awnings, window film, or efficient room air conditioners to keep summer homes livable. (Of course, this will not compensate people for the higher summer utility bills.)

We suspect that PG&E's proposed program will not be popular in many expensive, small-lot, residential subdivisions in the confer zones of Calaveras County. The above community engagement efforts may help to reduce the unpopularity of the program. It helps to do the right thing in the right way.

### **III Background:**

The CPC is a group of community organizations and individuals who want a healthy and sustainable future for Calaveras County. We believe that public participation is critical to a successful planning process. United behind eleven land use and development principles, we seek to balance the conservation of local agricultural, natural and historic resources, with the need to provide jobs, housing, safety, and services.

On May 9, 2018, CPC Facilitator Tom Infusino attended a meeting and field trip with representatives of Ebbetts Pass Forest Watch, and PG&E staff Tom Smith and Corey Peters. The field trip took place in the Arnold area, and considered the implementation of PG&E's proposed fire safety work along the Highway 4 Scenic Corridor, and in neighborhoods.

It is important for PG&E to understand the diversity of people and the places in Calaveras County where they will be implementing the fire safety program.

The Tier 3 landscape in Calaveras County is very diverse, as it ranges from oak savanna below 1,000 feet in elevation, to oak woodlands, to mixed confer forests, and to the crest of the Sierra at above 10,000 feet in elevation. Calaveras County has more private land (75%) than any other County in the Sierra. Thus, the PG&E fire safety program will greatly affect private property owners. The weather conditions affecting fire safety and electrical system conditions include high winds throughout the county, and snow loads above 2500 feet in elevation. The property uses range from grazing on large ranches in the oak savanna and in oak woodlands, and timber operations in the confer forests; to small-lot residential and commercial developments near community centers scattered along Highways 4, 49, 12, and 26. Fire safety programs that remove brush in the oak savanna may be welcome by many, while the removal of towering confers from the front yards of exclusive neighborhoods may be much less welcome. Some



people with homes in residential subdivisions, who nurtured trees on PG&E's approved list for planting under power lines (e.g. manzanita, redbud, Japanese maple, etc.), will not be happy that PG&E is now removing those very trees from their yards.

The people of Calaveras County have diverse political opinions.

There is a very strong contingent of individual rights/property rights people. While some will welcome PG&E finally doing its part for fire safety, others may resent being told how to manage their rural land by a San Francisco-based company. Some may not want to sacrifice their timber and property values without fair compensation. Some of these people paid a great deal for a forested lot, and will not sacrifice that value without a fight.

On the other end of the political spectrum, there are also well organized neighborhood and environmental groups. Some may question the extent of the proposed operation. Some may question the impact of PG&E proposed program on the environment. Some may be concerned about the aesthetics of their neighborhood after the project is complete. Some may favor a "remove and replace" approach to vegetation management, rather than a "remove and herbicide" approach that could have adverse impacts.

In the 21<sup>st</sup> century, with local media outlets online, blogs, interest group websites, Facebook and twitter; when bad publicity happens in Calaveras County, it spreads like, well, like wildfire. Those not hooked up to the internet and social media will get the news through traditional methods like newspapers and word-of-mouth. A few aggrieved property owners who have a bad experience with PG&E's fires safety program can get the word out to warn the rest of the County very quickly and very comprehensively.

The problem for PG&E is that the proposed fire safety program has the potential to upset both the politically conservative contingent of residents, and the community/environmental contingent of residents, as well as unaffiliated individual property owners. Each of these contingents has access to very effective communications tools.

Finally, PG&E needs to appreciate the history of Calaveras County. It is one of periodic booms and busts. Various sectors of the economy have taken from the area, and left behind a legacy

of adverse side-effects for the remaining residents. In the 1840's to the 1880s, gold mining took out the gold, and left shafts and poisoned leachate we continue to deal with today. Genocide and dislocation took away most of our Native American community, and left behind a people justifiably suspicious of others. EBMUD took by condemnation 10,000 acres of land for its reservoir in the 1930's and continues to take millions of gallons of water per day; and has left us with an Upper Mokelumne River without native salmon runs. The timber mill boom played out after taking the biggest and the best trees; leaving behind communities of unemployed people, unhealthy forests and high fire risk plantations. Mechanized industrial clearcutting continues to erode local jobs; leaving behind a forest that looks like a moth eaten wool blanket even from outer space. The residential construction boom busted in 2008; leaving families homeless, and leaving the County with overtaxed infrastructure and lower levels of community services. Matters were made worse by four years of drought that resulted in tree disease, tree death, and trees burned in the Butte Fire. Therefore, PG&E needs to realize that if it comes to take from the people of Calaveras County, and leave a mess behind, people in Calaveras County will have an adverse reaction that is justified and ingrained by 175 years of history.

#### **IV Project Description**

This is the proposed program as we understand it. **If we got any of the details incorrect below, please let us know.** Also, if we got any of the details incorrect, after a three-hour meeting and a field trip, imagine how many misunderstandings customers might have after a 10-15 minute conversation with the tree/brush removal contractor.

#### **A) Who?**

**1) First, PG&E staff will describe the program to home owners' associations, and community groups where the work will be done.**

Initially, PG&E skipped this step, and began by sending tree/brush removal contractors to seek permission from property owners. Corey Peters and Tom Smith indicated that they will now meet with community groups and home owners' associations prior to future operations.

This is an important part of the process. If PG&E wants to get people's consent, then they will need to educate people on why the treatment needs to be so drastically different than what they have experienced to date.

People who are used to PG&E cutting hole in the middle of their shade-producing oak tree for decades are now going to have that oak tree removed. People who have had PG&E trim their towering conifers in the past are now going to have those trees removed entirely. People who have landscaped their yards with 3 to 4-foot tall ornamental bushes, and 8-foot ornamental trees, some right off the PG&E list of approved plants for growing under power lines, will have all that removed. People are not going to sacrifice the beauty of their front yards, and the value of their landscaping and real property, unless they believe that the program is absolutely necessary for the safety of their person and property.

Also, it is absolutely critical that the details of people's rights and obligations are spelled out in writing, and that the prescription that PG&E seeks to implement is spelled out in detail. People need to know what they have to accept in the easement, and what they can say no to outside the easement. People need to know what PG&E will remove in its easement and beyond. PG&E must not rely on paperwork from prior different projects for use in this projects. PG&E would be wise to send out drafts of those new project materials to some HOA's and community groups to review prior to finalizing those documents.



*Towering conifers within the “15 feet from the pole” removal area.*

Regardless of how well trained they are, it would be a mistake to rely on a couple of dozen tree/brush removal contractors to verbally describe the material parts of the program exactly the same to each homeowner, and to have those people understand the verbal description exactly the same. The more modes of learning people can receive (e.g. written words, spoken words, pictures and diagrams, etc.) the less likely that there will be misunderstandings. The more “misunderstandings” that occur, the madder people will get about the program, and the more bad publicity will circulate. Bad publicity could significantly hamper PG&E’s efforts to



implement the program in years 2 and 3, as people lose trust in PG&E's word, because of what people believe they heard a tree/brush removal contractor say to them.

People also need to know what they can plant in the easement to replace what PG&E takes out. This is critical to the success of the program. Low growing, less volatile, vegetation needs to be put in right away, so that the less desirable species do not return or invade the freshly disturbed ground that is now bathed in sunlight after the over-story has been removed. Also, the longer that people's front yards look ugly, the more bad publicity PG&E will get. That will significantly hamper PG&E's efforts to implement the program in years 2 and 3, as people will not want their neighborhoods to look bad for long periods of time.



*Landscaped garden within "15 feet from the pole" removal area.*

## **2) Second, the tree/brush removal contractors will meet on-site with owners**

The purpose of this meeting is to explain what PG&E will do at a minimum within 8 feet on either side of the poles the line area (and the likely easement), and to seek permission for what PG&E would like to do beyond the line area, out to 15 feet from the pole on either side.

## **3) Third, PG&E staff will contact owners who have not given consent.**

If the tree/brush removal contractor does not secure permission for work out to 15 feet from the pole on either side, then PG&E staff will (1) get the actual easement width from property records, and (2) follow up with an additional contact to try to seek the property owner's consent. If consent is not secured, no work will be done outside the PG&E easement.

## **4) Fourth, the contractor will mark the area and meet with the property owner.**

The area of tree/ brush removal and trimming will be marked by the contractor. The property owner will meet with the trimming/removal contractor to review the mark of the tree/brush removal and trimming, prior to the trimming/removal.

## **5) Fifth, the contractor will trim/remove the trees/brush.**

The program will not clear the ground to bare mineral soil. Leaves and needles will be spread out on site, while other debris will be removed or chipped. Some of the debris the contractor will sell as biomass and credit PG&E with the proceeds. If allowed by the property owner, the contractor will sell merchantable timber (which is the property of the land owner) and credit PG&E with the proceeds. PG&E will provide a list of approved plants that homeowners can grow under the lines that grow low, are easily maintained, and are attractive.

## **B) When?**

PG&E wants to complete treatment of the Tier 3 area over a three year period. We understand that nest trees will be avoided from February 15 through September 15. We were not told if and when work would be suspended during the wet season. Heavy equipment work in the forest and grading work in developed areas is usually suspended during the wet season.

### **C) Where?**

The fires safety work will be in all the Tier 3 lands in Calaveras County, as well as Tier 3 lands in the rest of PG&E's electricity distribution system in Northern California.

### **D) Why?**

The primary goal is to decrease the fire risk, maintenance costs, and liability in the extreme fires risk areas. To effectively do this with a program that extensively relies upon consent from property owners, PG&E may need to consider achieving secondary goals of building trust with people, improving community relations, remediating aesthetic harm to neighborhoods, and reducing environmental impacts.

### **E) How?**

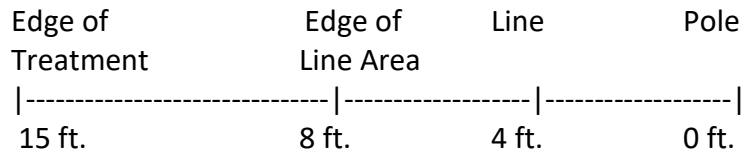
In the high fire threat areas, the California Public Utilities Commission requires that PG&E clear vegetation, around each distribution system wire, from a circle with a diameter equal to four feet plus one year of vegetation growth. PG&E wants to do much more.

In the Tier 3 area, PG&E will remove trunks, and overhanging limbs, and brush from 12 " above the ground vertically to the sky, and from the edge of the pole horizontally to the edge of the line area (usually 8 feet from the pole). If any of the remaining vegetation (i.e. 12" or smaller) is of a type not compatible with growing under the lines (ponderosa pine, cedar, manzanita, etc.) it will be removed down to the ground. Some consideration may be given to allow some individual, low growing, semi-dwarf, ornamental trees on a case by case basis.

If the PG&E easement is wider than eight feet, PG&E will apply the same prescription to the edge of the easement. If the land owner consents, PG&E will apply the same prescription out to 15 feet from the pole.

If application of a prescription removes more than a third of the canopy of a conifer, such that the life of the tree is threatened, PG&E will request to remove the tree even though it is outside the boundary of the treatment area, to avoid creating a hazard tree in the very the near future.

The landowner and PG&E may negotiate a different prescription in the area outside the PG&E easement.



Cut material will be removed at the same time (that is in 1 to 10 days) as the cutting operation. Some cut material will be chipped and scattered on site to reduce erosion and weed growth. Some leaves and needles will be scatter on site to reduce erosion and weed growth. Biomass may be sold by the contractor with some of the proceeds credited to PG&E. If the property owner allows, the contractor may sell commercial timber and credit PG&E with some of the proceeds.

If requested, some property owners experiencing substantial losses of landscaping or shade may be compensated up to \$250. At this time, PG&E will not be making that widely known to each affected property owner.



*Front yard shade trees within the removal area.*



According to Corey Peter, PG&E is developing, and will provide to landowners, a list of approved plants for growing under the lines in the future. These are plants that grow low, are easy to maintain, and are also attractive.

If requested, PG&E is willing to repair roads damaged by the tree removal operations, but is not making this widely known to affected property owners.

PG&E is considering putting up A-frame signs at the entrance to subdivisions to notify incoming traffic that work is underway.

At this time, PG&E is uncertain if it will make a special effort to notify realtors that this work is pending, even though it may materially affect the value of property for sale.

At this time, PG&E will not be releasing its internal risk assessment documents to help convince communities that the work is necessary.

At this time, PG&E will not be releasing its internal environmental reviews to demonstrate to communities that the environmental impacts of the work will be mitigated to the extent feasible.

At this time, PG&E will not be altering the prescription along scenic highway areas, and so will be removing many annually flowering dogwoods in the Arnold area.