



111 Stony Circle
Santa Rosa, CA 95401

September 3, 2013

Hon. David Rabbitt, Chair
Sonoma County Board of Supervisors
575 Administration Drive
Santa Rosa, CA 95403

Dear Chairman Rabbitt:

Thank you for the opportunity to share information regarding our vegetation management activities in Sonoma County. We are writing in response to the Board of Supervisors' request to detail our Transmission Right-of-way Program in regards to public lands in Sonoma County. While the issues outlined below are specifically in reference to public lands, we follow these best management practices throughout our service territory regardless of the landowner.

Above all else, PG&E is committed to public safety and the reliability of our electric and gas systems. With regard to our electric transmission facilities, one of the largest threats to their safe and reliable operation is the potential for contact between the power lines and vegetation. The consequences of contact between vegetation and power lines can create a significant threat to our community in the forms of not only widespread electric outages, but also devastating wildland fires. Just as wildfires can spread out of control, one electric transmission interruption can cascade to the point of affecting hundreds of thousands of customers.

The potential impact to life and property is enormous. Our challenge is ensuring that we balance the needs of the community with our responsibility to provide safe, reliable electric service. We welcome your collaboration and input in this endeavor.

PG&E has carefully considered the feedback received from a number of community stakeholders regarding our Transmission Right-of-way Maintenance Program. The input we have received from the Board as well as other elected officials, landowners, neighborhood groups and community leaders has improved our program in the following ways:

- We carefully examined our line clearance requirements and amended them from 40 feet across the length of the line to 35 feet at the quarter-mark and 30 feet at the support structure, allowing us to prune rather than remove more trees along our easements;
- We heeded the request from the Board of Supervisors to work closely with the Sonoma County Open Space District & Sonoma County Regional Parks to address a few areas of concern on public lands. We have met several times with Bill Keene, Sheri Emerson, Bert Whitaker, and Jim Piercy and are working with them to plan our activities well in advance for next year and beyond, allowing for maximum input from these experts and minimal impacts on the public's enjoyment of these lands;
- We have conducted an unprecedented level of community and landowner outreach and education about the program. As part of the outreach, PG&E has:

- Met with HOA's to discuss proposed work and develop mutually-acceptable work plans;
- Held a town hall meeting with more than 100 attendees;
- Met with a number of local, state and federal elected officials and their staffs;
- Met with local media outlets;
- Mailed approximately 1,500 letters to affected property owners to provide information and invite discussion about our work;
- Worked with property owners to discuss the work planned at their property and address any questions or concerns they may have;
- Made numerous adjustments to our management activities based on feedback from individual property owners and community stakeholder groups.

The Board has highlighted the following four areas that we would like to address in further detail:

1. Removal vs. Pruning

PG&E's transmission vegetation management (VM) program is designed to retain and encourage low-growing plant communities within the transmission corridor while selectively removing or pruning trees that are incompatible with the transmission lines. Incompatible trees are trees that can grow into, fall into, or otherwise interfere with the power lines. PG&E follows nationally accepted industry standard ANSI A300 Parts 1 & 7 as related to utility vegetation management. Specific work prescriptions are made on a tree by tree basis by Utility Arborists and Foresters with specialized training on electric utility infrastructure, regulatory and safety requirements. Decisions are based on line voltage/criticality, tree species, growth rates, environmental factors, tree health, proximity to the facilities, facility construction, potential conductor movement, location in the span, regulatory requirements for the area, reliability impact and fire danger. PG&E does not "clear cut" along its utility easements - we remove only as much vegetation as necessary to ensure the safety and reliability of the transmission lines.

Overall, PG&E's vegetation management program (both transmission and distribution) prunes many more trees than we remove. However, because transmission lines serve whole regions and are a part of the national grid, there is a greater need to keep trees from ever interfering with these critical lines and it is necessary to be scrupulous about eliminating incompatible trees from transmission rights-of-way.

We appreciate working successfully with County staff to explore opportunities to selectively prune trees in sensitive areas where tree health and public safety are not compromised – and we will work with staff to ensure this collaboration continues.

2. Invasive Plant Species

PG&E and property-owners share a common goal: to reduce incompatible and non-native invasive plant species from easements. Environmental stewardship is a key focus to ensuring a successful partnership between property owners and PG&E. PG&E is committed to working directly with its easement partners to ensure a safe compatible vegetation type evolves within these easements. We employ an invasive species management method utilizing Integrated Vegetation Management (IVM) techniques such as, but not limited to: removal of undesirable vegetation, use of EPA approved herbicide, and selective livestock grazing. Herbicides are commonly used to control regrowth of non-native invasive species

such as Arundo, Broom and Tree-of heaven. Another common measure we use to control spread of Sudden Oak Death (SOD) is ensuring that tools are washed and sanitized.

Invasive species are counter-productive to our goal of encouraging low growing, native plant communities. Therefore, PG&E conducts regular patrols of our electric easements where we monitor growth of incompatible vegetation and invasive plant species. We will continue to build upon our ongoing partnership with the County to help manage incompatible and invasive species within our easements and be responsive if areas of concern are identified.

3. Soil Stability and Water Resource Protection

All proposed tree pruning or removal work within a riparian area is evaluated through an environmental Riparian Review process prior to starting work. This includes a review of California Natural Diversity Database, anadromous streams maps, critical habitat database, air photos, topographic maps, a USFWS species database, and other resources.

If the work will have minimal potential for impacts, and will not trigger a Notification of Streambed Alteration to California Department of Fish & Wildlife (CDF&W), the location is released to be worked and PG&E's Best Management Practices (BMPs) are implemented. Even after following the BMP's, if the work may impact a stream or wetland, or a listed species or its habitat may be located at the work location, a biologist conducts a field site review. The biologist then prepares a site-specific BMP with Avoidance and Minimization Measures to avoid impacts for work at that location.

If needed, a biologist will prepare a Notification to be submitted to CDF&W to commence the Fish and Game Code section 1600 permit process. When a Streambed Alteration Agreement is approved or found not to be required, the location is then released for work.

PG&E uses the following BMPs for all vegetation work near streams:

- Remove only as much vegetation as necessary to establish reasonable clearance around the lines.
- Where possible, avoid removing vegetation from the bank area of the stream.
- Avoid ground disturbance that could lead to soil movement toward the stream.
- If ground disturbance is unavoidable, implement standard measures (BMPs) for erosion control and soil stabilization.
- Prevent cut vegetation and debris associated with the activities from entering the stream.
- Remove work-generated debris from below the high water mark of the stream.
- Chip woody debris less than 4" diameter, where accessible, and blow the chips back onto the ground away from the stream. Debris that is inaccessible by chipper is lopped and scattered to stabilize the ground surface and reduce raindrop impact.
- Remove work-generated woody debris within the stream banks by hand and place it outside of the banks, where it will not re-enter the stream.
- Operate vehicles only on existing roads within the riparian area.
- Access work within the riparian area by foot traffic only.
- Ensure that workers and equipment do not enter the wetted portion of any stream channel.

In addition to its normal riparian review process, PG&E commissioned two independent soil scientist and engineering geologist reports in the Sonoma Mountain area in the last year to study whether its vegetation management activities might lead to increased risk of erosion in stream beds or degradation

of water quality. Both reports show that no erosion or sediment delivery to watercourses could be found from previous vegetation management work. Also, the findings indicate that there is minimal soil disturbance from vegetation management activities.

Because trees are cut close to the ground without removing stumps, soil is not disturbed. Roots of cut trees will often remain alive and the stumps re-sprout. The root systems of off-right-of-way trees extend into the electric transmission corridor and provide further soil stability. Shorter vegetation expands their root mass, and low growing vegetation and surface layer vegetative matter prevents surface erosion. Also, most of the work is done by hand and on foot, minimizing soil surface disturbance. In sum, the risk of sediment delivery to watercourses is very low.

PG&E strives to protect and enhance riparian areas and will continue to work with County staff to address any areas of concern that may arise.

4. Tree Planting

PG&E has a long-standing commitment to environmental stewardship and we already work with many organizations in and around Sonoma County on environmental initiatives. During our discussions with Parks and Open Space, we have talked about many ways we can help with utility compatible vegetation activities, oak tree preservation, tree planting at suitable locations on public lands and/or other additional opportunities identified by County staff.

We understand that vegetation maintenance and planning are important issues to the community. As we've committed, we will continue to openly communicate with interested stakeholders while also upholding our obligation to provide safe, reliable and affordable electric service to homes, schools and businesses across Northern and Central California.

We value the productive relationship we have enjoyed with the Board of Supervisors for many years and look forward to continuing this relationship well into the future. The importance of green spaces and the benefits that trees and other vegetation bring to all of our Sonoma County homes and neighborhoods is substantial. PG&E takes its commitment to the communities within Sonoma County very seriously. If you have any questions, please contact me at Redacted

Sincerely,

Redacted

Supervising Program Manager
Transmission Vegetation Management

CC:

Supervisor Susan Gorin, First District
Supervisor Shirlee Zane, Third District
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