
From: Nancy Macy <nbbm@cruzio.com>
Sent: Thursday, November 3, 2022 4:40 PM
To: ESRB_ComplianceFilings; Tran, Lana; Yergovich, Matthew; Haro, Lea
Subject: [EXTERNAL] Comments on Resolution M-4864

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



November 3, 2022

Rachel Peterson, Executive Director

California Public Utilities Commission 505 Van Ness Avenue

San Francisco, CA 94102

Submitted via email to ESRB_ComplianceFilings@cpuc.ca.gov; Lana.Tran@cpuc.ca.gov;
Matthew.Yergovich@cpuc.ca.gov; Lea.Haro@cpuc.ca.gov

Comments on Resolution M-4864

Dear Ms. Peterson,

On behalf of the **Environmental Committee of the Valley Women's Club** (a 45-years active community organization working to protect and enhance the San Lorenzo Valley Watershed and the Santa Cruz Coastal Mountains), and the **Utility Wildfire Prevention Task Force** with active members throughout PG&E's forested service areas and beyond, we strongly urge the Commission to retain PG&E on Step 1 of the "Enhanced Oversight and Enforcement Process" (Enforcement Process).

PG&E may claim it has improved the focus of its vegetation management for wildfire prevention by increasing tree clearing far outside its powerlines through high fire threat areas, but that is most certainly not the case. For

years it has increased the number of trees removed to no avail. It is impossible to cut down enough trees to protect PG&E's failing system. The mythology that cutting down trees will prevent utility-associated wildfire disregards the fact that wildfires are started because PG&E's bare power lines and other aging infrastructure have and will continue to cause fires, and these fires will cause massive damage due to drought and high winds caused by climate change.

PG&E has failed to obtain CalFire-required permits for its Enhanced Vegetation Management (EVM) treework. By clear-cutting along hundreds of miles of powerlines, PG&E is ignoring fundamental landowner rights, is failing to adhere to Forest Practice Rules and is neglecting required safety trimming (the Regular Vegetation Management as required in CPUC General Order 95), to focus on taking down millions of trees far beyond its legal easements and rights of way.

PG&E's EVM ignores endangered species protection requirements, threatening recovery of salmonids throughout central and northern California. EVM destroys valued vistas, impacting tourism and local economies dependent upon visitors.

In addition, both during its destructive post-wildfire clearing far from its right-of-way, and its massively increased EVM, PG&E egregiously continues leaving dangerous logs and vegetation debris behind. Thus, PG&E is causing severe damage to waterways and riparian corridors. PG&E's EVM is impairing public safety, increasing the possibility of and potential severity of wildfires from miles of downed trees, adding to already dangerous, drought-fed fuel loads and compromising the ability of property owners to maintain defensible space and abate hazards on private property.

Most egregious, PG&E's removal of millions of mature trees is exacerbating climate change at a time when every tree is needed to mitigate warming. The number of trees rivals that of commercial timber harvests.

Compounding the issues of EVM is PG&E's lack of certified arborists inspecting trees - instead providing a two-week training program that cannot begin to adequately evaluate what trees are actually Danger trees. That and its failed oversight of the hundreds of tree crews that are highly motivated to cut more trees to increase profits, cannot be ignored. Landowners are facing pressure and threats when they question of need to remove valued trees.

The calls for a moratorium on EVM and for comprehensive modernization of its aging, unsafe and unreliable infrastructure (such as has been successfully undertaken by Southern California Edison) are increasing daily. Piecemeal fixes, such as replacing hundreds of power poles but keeping the old, bare conductor, are not adequate. Undergrounding is not doable in far too much of the High Fire Threat Areas, and will take far too many years, for it to be considered the best solution; it will be a heavy financial burden adding significantly to inflation at a very bad time for that.

It is incumbent upon the Commission to hold PG&E at Step 1 and to consider moving it to Step 2, for continuing to endanger us all.

Respectfully yours,

Nancy B. Macy

Chair, Utility Wildfire Prevention Task Force

<https://endpowerlinefires.com>

Chair, Environmental Committee

(Valley Women's Club of San Lorenzo Valley, Inc.

www.valleywomensclub.org)