

VanSusteren, Jane@CALFIRE

From: Public Comments@BOF
Sent: Tuesday, July 9, 2024 11:24 AM
To: Craig, Dan@CALFIRE; VanSusteren, Jane@CALFIRE; Lawhorn, Andrew@BOF
Subject: FW: PG&E skullduggery

From: Roland Saher [REDACTED]
Sent: Monday, July 8, 2024 10:23 PM
To: Public Comments@BOF <PublicComments@bof.ca.gov>
Subject: PG&E skullduggery

Warning: this message is from an external user and should be treated with caution.

Dear members of the Board, I commend you for the work you have done so far to keep PG&E from getting past their failure to have their wishes re: removing trees in certain locations.

I strongly urge you to stick with the widths of ROW you have set so far. I also appreciate the work you have done in defining what a "danger tree" is and re: removal of woody debris.

Improvements should be made in terms of notifying property owners and reimbursements when trees have been removed illegally.

I am very connected to a farm located in the hills above Davenport (north of Santa Cruz) which will be greatly affected by the outcome of this struggle.

With gratitude for your good work so far, Roland Saher

VanSusteren, Jane@CALFIRE

From: Public Comments@BOF
Sent: Thursday, July 11, 2024 1:46 PM
To: Craig, Dan@CALFIRE; Lawhorn, Andrew@BOF; VanSusteren, Jane@CALFIRE
Subject: FW: Comments on Utility Right-of-Way Exemption Plead

From: Jennie Dusheck [REDACTED]
Sent: Thursday, July 11, 2024 12:50 PM
To: Public Comments@BOF <PublicComments@bof.ca.gov>
Subject: Comments on Utility Right-of-Way Exemption Plead

Warning: this message is from an external user and should be treated with caution.

Dear Chair O'Brien and Members of the Board of Forestry,

Thank you so much for taking the time to read public comments.

I am a landowner in Santa Cruz County. I live on 10 acres that are crossed by multiple PG&E distribution lines, including bare lines right next to my home (that do not serve my house). Over the years, crews sent by PG&E have repeatedly cut down trees or trimmed trees and left the slash un-chipped and un-lopped, sometimes within 30 feet of my house.

Over and over I have had to clean up debris left by PG&E vegetation management. If I call them back to chip or lop, they have nearly always resisted coming back and if they come, they do the bare minimum, e.g., refusing to chip anything I didn't personally drag 10-20 feet up a steep hill to a paved road.

In one case, they accused me of cutting down a 40-foot redwood myself, pretending it wasn't them, even though it was under their lines, far from any structure, and close to a paved road.

PG&E definitely needs oversight. Landowners should have someone they can appeal to who is not PG&E when PG&E does not follow the rules. We should also have an easy source of clear information about what the rules are. We should not have to wonder if Davey Tree even knows what the rules are, let alone abide by them.

Additionally:

Please retain the current rights of way.

Please insist that all trees cut down are at least lopped, no matter where they are.

Please insist that PG&E or their representatives consult with homeowners and provide a written statement of the vegetation management plan for their property, mapping and identifying specific trees for what treatment. They used to do this and no longer do.

Thank you so much for providing some resistance to PG&E's efforts to escape responsibility.

I would like to mention in closing that I am also a small forest owner (47 acres of redwood TPZ near Boulder Creek, Ca); I worked for the US Forest Service, in Mount Shasta, in my youth; I worked at UC Berkeley's Department of Forestry; and that, later, my father, George Dusheck, was a member of the Board of Forestry under Jerry Brown's first administration.

I appreciate all the work you do.

Best wishes,

Jennie Dusheck
Health & Climate, Writing & Editing



VanSusteren, Jane@CALFIRE

From: Public Comments@BOF
Sent: Friday, July 12, 2024 1:21 PM
To: Lawhorn, Andrew@BOF; Craig, Dan@CALFIRE; VanSusteren, Jane@CALFIRE
Subject: FW: Utility Right-of-Way Exemption, comment

From: kent Strumpell [REDACTED]
Sent: Friday, July 12, 2024 11:20 AM
To: Public Comments@BOF <PublicComments@bof.ca.gov>
Subject: Utility Right-of-Way Exemption, comment

Warning: this message is from an external user and should be treated with caution.

Dear Members of the Board of Forestry,

Please retain the existing ROW widths.

I support the proposed changes to define “danger tree”.

Additional language is needed to assure that property owners are not burdened with the disposal of woody debris. The utility should not be allowed to push the responsibility for proper disposal onto property owners as it is their equipment that creates the hazard.

Thank you,

Kent Strumpell
[REDACTED]

VanSusteren, Jane@CALFIRE

From: Public Comments@BOF
Sent: Tuesday, July 9, 2024 11:20 AM
To: Lawhorn, Andrew@BOF; VanSusteren, Jane@CALFIRE; Craig, Dan@CALFIRE
Subject: FW: Public Comment on potential changes in rules around the Utility Right of Way (ROW) Exemption Permit

From: Ann R. Thryft [REDACTED]
Sent: Tuesday, July 9, 2024 11:17 AM
To: Public Comments@BOF <PublicComments@bof.ca.gov>
Subject: Public Comment on potential changes in rules around the Utility Right of Way (ROW) Exemption Permit

Warning: this message is from an external user and should be treated with caution.

Dear Chair O'Brien and Members of the Board of Forestry,

I'm a 24-year resident of Boulder Creek, California in the burn scar of the 2020 CZU Lightning Complex Fire. I'm also a lifelong customer of PG&E and have interacted with them or their contractors several times regarding which trees they're allowed to trim or cut down on my property here in a Tier III, very-high-fire-danger area of the Santa Cruz Mountains.

Thank you for the opportunity to submit comments regarding proposed changes to the Utility Right-of-Way (ROW) Exemption Permit. The critical environmental protections established by the Forest Practice Rules to California's forested lands should not be altered to allow greater removal of trees within the utility ROW, and additions to the Permit are needed to protect property owners as well as to protect our carbon-sequestering, soil-moisture-retaining, erosion-preventing trees.

1. PG&E is attempting to use the Board of Forestry to circumvent their failure in 2022 to get a key piece of legislation passed (SB 396). That legislation would have given them permission to trim, prune, and remove trees on private property without oversight from any other enforcement agency, including CalFire, Department of Fish and Wildlife (DFW) and Regional Water Quality Control Boards (RWQCB).
2. I support retention of the existing ROW widths for electric utilities.
3. I also appreciate the changes made to language around what defines a "Danger Tree." Specifying a time limit of "within one year" is far better than previous more vague parameters, which always favored the utility's desire to preemptively remove trees to avoid repeated trimming.
4. I commend you for the effort to improve language regarding removal of woody debris, and a shorter time period within which this must be completed, as any felled debris left lying on private property or on the ROW itself provides fuel for wildfire and increases the risk of such fire.
5. Additional language is required mandating that CalFire be notified in advance as to where utility vegetation work is planned, for how long, and of what scope, to allow more effective

monitoring of that work by both CalFire and other enforcement agencies such as DFW and RWQCB. (CalFire will need additional financial support to set up this safeguard and to provide additional inspectors making unannounced visits).

6. The failed mandate in PRC 4295.5(a)(b) for utilities to notify property owners that trees will be taken down on their property -- along with the landowner's right to be heard and, if needed, the right to damages when valuable trees are taken down unjustifiably -- is poorly defined. This forces the affected property owner to ask the utility doing the work to listen to their concerns, leaving them at the whim of the contractor doing the work. The only logical alternative is for CalFire to take responsibility for providing that State-mandated oversight process for the greater protection of property owners, and the Exemption Permit is the appropriate place for that requirement.

Yours most sincerely,

Ann Thryft



Boulder. Creek, CA 95006

VanSusteren, Jane@CALFIRE

From: Public Comments@BOF
Sent: Tuesday, July 9, 2024 11:20 AM
To: VanSusteren, Jane@CALFIRE
Subject: FW: Comments on Utility ROW Exemption Plead.

From: Pauline Seales [REDACTED]
Sent: Tuesday, July 9, 2024 8:49 AM
To: Public Comments@BOF <PublicComments@bof.ca.gov>
Subject: Comments on Utility ROW Exemption Plead.

Warning: this message is from an external user and should be treated with caution.

Dear Chair O'Brien and Members of the Board,

I am writing on behalf of the 1908 local members of Santa Cruz Climate Action Network.

Thank you for the opportunity to submit comments regarding proposed changes to the Utility Right-of-Way

(ROW) Exemption Plead. The critical environmental protections established by the Forest Practice Rules for

California's forested lands should not be altered to allow greater removal of trees within the utility ROW.

1. PG&E is attempting to use the Board of Forestry to circumvent the failure to advance a key piece of

legislation in 2022 (SB 396), which would have given them permission to trim, prune, and remove trees on private property without oversight from any other enforcement agency, including Cal Fire, CA Department of Fish and Wildlife, and the Water Quality Control Board (WQCB).

2. I strongly support your retention of the existing ROW widths.

3. I also appreciate the changes made to language around what defines a 'Danger Tree'. Specifying a time limit of 'within one year' is far better than the previous more vague parameters, which will always favor the utility's desire to preemptively remove trees to avoid repeated trimming.

4. You are to be commended for the effort to improve language regarding removal of woody debris, and a shorter time period within which this is done, as any felled debris left lying on private property or in the ROW itself provides fuel for wildfire and increases the risk of such fire the longer it remains.

5. Additional language mandating that Cal Fire be notified in advance as to where utility vegetation work is

planned, for how long, and of what scope, would allow more effective monitoring of that work by both Cal Fire and other enforcement agencies such as DFW and WQCB. (CalFire will need additional financial support to set up this safeguard and to provide additional inspectors making unannounced visits.)

6. The mandate in PRC 4295.5(a)(b) for utilities to notify property owners that there will be trees taken down on their property, along with the landowner's right to be heard and, if needed, the right to damages when valuable trees are taken down unjustifiably, is poorly defined. This forces the affected property owner to ask the utility doing the work to listen to their concerns without the involvement of any other agency, leaving them at the whim of the contractor doing the work. The logical alternative is for

Cal Fire to take responsibility for that State-mandated oversight process, allowing better protections for property owners; the Exemption Permit is the appropriate place for that requirement.

I appreciate your consideration of my concerns.

Respectfully,

Pauline Seales

VanSusteren, Jane@CALFIRE

From: Public Comments@BOF
Sent: Friday, July 12, 2024 9:59 AM
To: Lawhorn, Andrew@BOF; Craig, Dan@CALFIRE; VanSusteren, Jane@CALFIRE
Subject: FW: Comments on Utility Right-of-Way Exemption Plead

From: Jessica McVey [REDACTED]
Sent: Thursday, July 11, 2024 9:26 PM
To: Public Comments@BOF <PublicComments@bof.ca.gov>
Subject: Comments on Utility Right-of-Way Exemption Plead

Warning: this message is from an external user and should be treated with caution.

Dear Chair O'Brien and Members of the Board of Forestry,

Thank you for the opportunity to submit comments regarding proposed changes to the Utility Right-of-Way (ROW) Exemption Plead. The critical environmental protections established by the Forest Practice Rules for California's forested lands should not be altered to allow greater removal of trees within the utility ROW.

1. PG&E is attempting to use the Board of Forestry to circumvent the failure to advance a key piece of legislation in 2022 (SB 396), which would have given them permission to trim, prune, and remove trees on private property without oversight from any other enforcement agency, including Cal Fire, CA Department of Fish and Wildlife, and the Water Quality Control Board (WQCB).
2. I strongly support your retention of the existing ROW widths.
3. I also appreciate the changes made to language around what defines a 'Danger Tree'. Specifying a time limit of 'within one year' is far better than the previous more vague parameters, which will always favor the utility's desire to preemptively remove trees to avoid repeated trimming.
4. You are to be commended for the effort to improve language regarding removal of woody debris, and a shorter time period within which this is done, as any felled debris left lying on private property or in the ROW itself provides fuel for wildfire and increases the risk of such fire the longer it remains.
5. Additional language mandating that Cal Fire be notified in advance as to where utility vegetation work is planned, for how long, and of what scope, would allow more effective monitoring of that work by both Cal Fire and other enforcement agencies such as DFW and WQCB. (CalFire will need additional financial support to set up this safeguard and to provide additional inspectors making unannounced visits.)
6. The mandate in PRC 4295.5(a)(b) for utilities to notify property owners that there will be trees taken down on their property, along with the landowner's right to be heard and, if needed,

the right to damages when valuable trees are taken down unjustifiably, is poorly defined. This forces the affected property owner to ask the utility doing the work to listen to their concerns without the involvement of any other agency, leaving them at the whim of the contractor doing the work. The logical alternative is for Cal Fire to take responsibility for that State-mandated oversight process, allowing better protections for property owners; the Exemption Permit is the appropriate place for that requirement.

I appreciate your consideration of my concerns.

Respectfully,

Jess McVey
Realtor, DRE 02044473

VanSusteren, Jane@CALFIRE

From: Public Comments@BOF
Sent: Friday, July 12, 2024 10:33 AM
To: Lawhorn, Andrew@BOF; Craig, Dan@CALFIRE; VanSusteren, Jane@CALFIRE
Subject: FW: Comments on Utility Right-of-Way Exemption Plead

From: Aaron Hollingshead [REDACTED]
Sent: Friday, July 12, 2024 10:12 AM
To: Public Comments@BOF <PublicComments@bof.ca.gov>
Subject: Comments on Utility Right-of-Way Exemption Plead

Warning: this message is from an external user and should be treated with caution.

Dear Chair O'Brien and Members of the Board of Forestry,

Thank you for the opportunity to submit comments regarding proposed changes to the Utility Right-of-Way (ROW) Exemption Plead. The critical environmental protections established by the Forest Practice Rules for California's forested lands should not be altered to allow greater removal of trees within the utility ROW.

1. PG&E is attempting to use the Board of Forestry to circumvent the failure to advance a key piece of legislation in 2022 (SB 396), which would have given them permission to trim, prune, and remove trees on private property without oversight from any other enforcement agency, including Cal Fire, CA Department of Fish and Wildlife, and the Water Quality Control Board (WQCB).
2. I strongly support your retention of the existing ROW widths.
3. I also appreciate the changes made to language around what defines a 'Danger Tree'. Specifying a time limit of 'within one year' is far better than the previous more vague parameters, which will always favor the utility's desire to preemptively remove trees to avoid repeated trimming.
4. You are to be commended for the effort to improve language regarding removal of woody debris, and a shorter time period within which this is done, as any felled debris left lying on private property or in the ROW itself provides fuel for wildfire and increases the risk of such fire the longer it remains.
5. Additional language mandating that Cal Fire be notified in advance as to where utility vegetation work is planned, for how long, and of what scope, would allow more effective monitoring of that work by both Cal Fire and other enforcement agencies such as DFW and WQCB. (CalFire will need additional financial support to set up this safeguard and to provide additional inspectors making unannounced visits.)
6. The mandate in PRC 4295.5(a)(b) for utilities to notify property owners that there will be trees taken down on their property, along with the landowner's right to be heard and, if needed, the right to damages when valuable trees are taken down unjustifiably, is poorly defined. This forces the affected property owner to ask the utility doing the work to listen to their concerns without the involvement of any other agency, leaving them at the whim of the contractor doing the work. The logical alternative is for Cal Fire to take responsibility for that State-mandated oversight process,

allowing better protections for property owners; the Exemption Permit is the appropriate place for that requirement.

I appreciate your consideration of my concerns.

Respectfully,

Aaron Hollingshead

- Ellen Roads NFPA Firewise Leader

VanSusteren, Jane@CALFIRE

From: Public Comments@BOF
Sent: Friday, July 12, 2024 10:33 AM
To: Lawhorn, Andrew@BOF; Craig, Dan@CALFIRE; VanSusteren, Jane@CALFIRE
Subject: FW: Comments on Utility Right-of-Way Exemption Plead

From: Laura Giorgi [REDACTED]
Sent: Friday, July 12, 2024 10:32 AM
To: Public Comments@BOF <PublicComments@bof.ca.gov>
Subject: Comments on Utility Right-of-Way Exemption Plead

Warning: this message is from an external user and should be treated with caution.

Dear Chair O'Brien and Members of the Board of Forestry,

Thank you for the opportunity to submit comments regarding proposed changes to the Utility Right-of-Way (ROW) Exemption Plead. The critical environmental protections established by the Forest Practice Rules for California's forested lands should not be altered to allow greater removal of trees within the utility ROW.

I live in the WUI in the Santa Cruz Mountains, and our property and neighborhood are surrounded by power lines. PG&E has done questionable vegetation work on our property and our street in the past.

Ultimately, I would like to advocate for increased oversight of PG&E's vegetation work. I deeply mistrust PG&E because of prior actions. To add to this mistrust, I listened to an interview with their CEO where she candidly admitted they are a profits company first, and being a utility provider is their way of delivering profits to their shareholders (paraphrasing). This does not put my mind at ease that PG&E has anyone's best interests in mind beyond their own.

1. PG&E is attempting to use the Board of Forestry to circumvent the failure to advance a key piece of legislation in 2022 (SB 396), which would have given them permission to trim, prune, and remove trees on private property without oversight from any other enforcement agency, including Cal Fire, CA Department of Fish and Wildlife, and the Water Quality Control Board (WQCB).
2. I strongly support your retention of the existing ROW widths.
3. I also appreciate the changes made to language around what defines a 'Danger Tree'. Specifying a time limit of 'within one year' is far better than the previous more vague parameters, which will always favor the utility's desire to preemptively remove trees to avoid repeated trimming.

4. You are to be commended for the effort to improve language regarding removal of woody debris, and a shorter time period within which this is done, as any felled debris left lying on private property or in the ROW itself provides fuel for wildfire and increases the risk of such fire the longer it remains.
5. Additional language mandating that Cal Fire be notified in advance as to where utility vegetation work is planned, for how long, and of what scope, would allow more effective monitoring of that work by both Cal Fire and other enforcement agencies such as DFW and WQCB. (CalFire will need additional financial support to set up this safeguard and to provide additional inspectors making unannounced visits.)
6. The mandate in PRC 4295.5(a)(b) for utilities to notify property owners that there will be trees taken down on their property, along with the landowner's right to be heard and, if needed, the right to damages when valuable trees are taken down unjustifiably, is poorly defined. This forces the affected property owner to ask the utility doing the work to listen to their concerns without the involvement of any other agency, leaving them at the whim of the contractor doing the work. The logical alternative is for Cal Fire to take responsibility for that State-mandated oversight process, allowing better protections for property owners; the Exemption Permit is the appropriate place for that requirement.

I appreciate your consideration of my concerns.

Respectfully,

Laura Giorgi