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California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

**RE: Pacific Gas and Electric Comments in Response to the Draft California 2030 Natural and Working Lands Climate Change Implementation Plan**

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to provide feedback in response to the Air Resources Board's (ARB) release of the January 2019 Draft California 2030 Natural and Working Lands Climate Change Implementation Plan (Draft Plan) in coordination with several other key state agencies.

PG&E strongly supports California's greenhouse gas (GHG) emission reduction goals and has been an active participant in California's GHG reduction programs since the inception of AB 32 through to the recent passage of SB 32. PG&E supports the goals of the Draft Plan to increase State-led conservation, restoration and management activities in order to help transform California's natural and working lands from an emissions source, to a resilient carbon emissions sink. Such an undertaking will require strong coordination with many actors, including California's utilities.

In order to help ensure that the activities proposed for implementation in the Draft Plan are executed efficiently and safely, PG&E offers the following recommendations:

- 1. Include utilities when developing the work plans for restoration programs that include tree planting.*

The Draft Plan highlights several state agency and regional programs for increasing tree canopy in urban areas, and creating windbreaks and riparian forest buffers among other initiatives that involve planting of new trees. PG&E recommends incorporating the concept of "right tree, right place," which means ensuring that all new trees near overhead electric lines and gas pipelines should be evaluated for appropriateness prior to planting. This is especially critical in the California Public Utilities Commission-defined High Fire Threat Districts. A consulting utility forester will provide expert advice on which types of trees are most compatible near electric

lines and gas pipelines based on tree size at maturity, species type (i.e. avoiding trees with a historical high likelihood of failure), and other characteristics such as the path in which a tree might fail.

*2. Ensure data from projects that could potentially change the geographic landscape are available to utilities.*

Similarly to the point above, when doing restoration of wetlands and riparian areas near existing utility infrastructure, PG&E recommends consulting with the utility. For riparian area restoration, wetlands restoration, and other projects that could potentially change the geographic landscape, PG&E recommends that data from such programs be made available to utilities since they could impact utility operations. For example, if the utility is unaware that an area is now riparian, a pre-inspector could patrol a circuit when the ground is dry but then water could be present when tree crews arrive to work at the location weeks later, leaving them unprepared. Updated data that can be used as layers for GIS mapping will allow utilities to continue to ensure compliance with our environmental best management practices (BMPs) and avoidance and minimization measures (AMMs). This information will also help to ensure appropriate reviews by our biologists or environmental specialists when planning work to consider any potential impacts on sensitive resources, and to obtain any necessary permits and authorizations.

*3. Partner with utilities when working with private landowners on forest management projects.*

When working with private landowners on forest management, PG&E recommends working with utilities to ensure access to resources for performing tree work safely near electric and gas lines. A property owner trimming his or her own trees or hiring a non-qualified line clearance tree contractor to trim trees within 10 feet of a conductor energized at 750 volts or more is dangerous and a violation of state and federal law. If necessary, PG&E can de-energize the line so property owners can safely trim trees. In most instances, there is no charge for this service.

PG&E continues to support efforts that will help the state meet its aggressive environmental goals while maintaining safety. Please feel free to contact me if you have any questions or concerns.

Sincerely,

/s/

Fariya Ali