

Accufacts Inc.

“Clear Knowledge in the Over Information Age”

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To: Michael Dawson
www.savelafayettetrees.org

Re: Accufacts Evaluation of PG&E Assertions of Gas Pipelines Safety Dangers from Trees in Lafayette, California

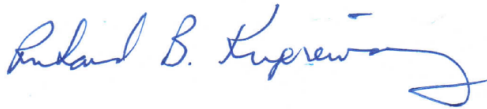
Accufacts Inc. was asked to review assertions by PG&E that the trees along PG&E’s gas pipeline system within Lafayette pose a safety danger. PG&E claims the situation within their pipeline system is somehow unique and merits that the pipeline right-of ways be sterilized by widespread removal of trees under the misguided claim of safety. Accufacts finds PG&E claims regarding tree threats to pipelines within Lafayette at best to be disingenuous and at worse, false. There are many miles of pipeline right-or-ways (“ROWs”) spanning the U.S that contain trees. PG&E is not the only pipeline operator that has trees in their ROWs. Despite PG&E’s various attempts to misinform, the Pipeline and Hazardous Materials Safety Administration, or PHMSA, which is responsible for federal pipeline safety regulations, has no safety regulations prohibiting trees in pipeline ROWs. While there may be a few trees across the U.S. that might be a legitimate safety concern, the reality is that they are very few in number. **Bottom line, PG&E is overstating the risk of trees to their pipelines, especially those in Lafayette.** It is my opinion that PG&E is attempting to accomplish another agenda that has little if anything to do with pipeline safety.

PG&E natural gas pipelines spanning Lafayette are small diameter, lower stress pipelines that are not likely to rupture, and even if they catastrophically break the impact zone is small, limited by the laws of thermodynamics. The presence of trees should not hamper leak surveys as there are technologies that can determine gas leaks through foliage, and this technology has been available for at least a couple of decades.

While I commend the citizens of Lafayette for attempting to establish meaningful constructive dialogue with PG&E, it is difficult to establish a productive relationship when a pipeline operator is so bent on not telling the truth. I would advise the citizen and city/county representatives to petition the California Public Utilities Commission to suspend that part of the Community Pipeline Safety Initiative they have approved affecting Lafayette and similarly affected communities that PG&E is attempting to use to justify tree removal. A more factual and

informed public discussion needs to occur that gets to the truth concerning trees, gas pipelines, and right-of-way issues, especially as they relate to Lafayette.

Accufacts Inc. has over four decades of experience and provides consultation to various local, state and federal agencies, NGOs, the public, and pipeline industry members on pipeline safety regulation, operation, maintenance, design, and risk management, with particular emphasis on operation in unusually sensitive areas of high population density or environmental sensitivity.



Richard B. Kuprewicz,
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