

August 20, 2019

East Bay Regional Parks District
ATTN: Robert E. Doyle, General Manager
2950 Peralta Oaks Court
Oakland, CA 94605

Dear Mr. Doyle,

The East Bay Regional Park District is the crown jewel of the Bay Area, and future generations depend upon our preservation efforts today. EBRPD normally performs its duty admirably, but unfortunately this summer introduced unnecessary environmental damage, as well as decreased public safety, with PG&E's cutting down of 245 trees along the gas transmission pipeline in Briones Park.

The trees removed ranged in size from small to the very large, and they stretched from the northmost trail of the Alhambra staging area to the southern Briones borders. Recently, I walked with great sadness as I witnessed portions of newly-exposed Briones Crest, Table Top and Spengler Trails, beautiful ridgelines now scarred by rows of ugly stumps. The remnants of some of these trees are captured here: <https://www.savelafayettetrees.org/briones-park>.

My objection against this tree-cutting goes beyond the aesthetic:

- 1. The tree cutting in Briones Park was unnecessary for safe pipeline operation.** There is no state or federal law requiring PG&E to clear pipeline easements of trees. PG&E admits there is no quantifiable improvement to pipeline safety by removing trees and that no tree has caused a transmission pipeline accident in California, a fact confirmed by federal PHMSA data. PG&E's claims that first responders need immediate access to pipelines in the event of an emergency are disputed by fire captains in our area who have publically testified against PG&E's rationale; first responders state that immediate shut off of gas lines is required, not tree removal. If PG&E cleared trees for the convenience of aerial inspections, it was unnecessary, as federal law clearly requires pipeline operators to use foot patrol when aerial patrol is unavailable.
- 2. Tree cutting in Briones Park has made our park less safe.** PG&E has cut trees but left the roots to decompose in place. Per PG&E's own tree root interference study published in 2015, this creates a potent environment where increased CO₂ from decaying matter will increase the risk of external corrosion and stress corrosion cracking on the steel pipeline, a known and serious safety risk. Also, a visual inspection of the area shows tree cutting crews toppled gas line markers which are required to be visible at all times per pipeline laws.
- 3. The tree cutting in Briones Park destroyed natural habitat.** Many older oaks along the hillside and creek beds were removed during the summer nesting season, a harmful and avoidable timeframe for wildlife as warned by the Executive Director of the Lindsay Wildlife Experience in this letter: <https://bit.ly/30jcRRP>. Also, it appears crews used dangerous, cancer-causing herbicides on ridgeline stumps adjacent to public trails, a practice that EBRP has banned starting in 2020.

4. **More trees were removed from Briones Park than prescribed by PG&E's guidelines.** The MOU signed by EBRPD prescribes tree removal 14' on either side of the pipeline, although PG&E's discretionary guidelines describe only trees within 5' of the pipeline. In Lafayette, 272 trees (all 5' or closer) were further reduced to 207 trees after PG&E partially resurveyed the pipeline and found pipe depth errors in their calculations. Also, trees not even marked by PG&E for removal as part of this program were unnecessarily cut down by crews in Briones Park.

5. **PG&E's \$255,000 payment should have been used for proven pipeline safety improvements.** PG&E's funds are restricted by the CPUC's rate setting process, and PG&E has not completed important safety projects in Briones Park including inline inspection, strength testing, cathodic protection stations, or the installation of more automated shut-off valves. It's unclear how EBRPD will use PG&E's payment of \$255,000. Shouldn't funds from our utility have been used for improved gas pipeline safety?

7. **Neither EBRPD or PG&E has been transparent with the public.** Despite repeated requests, we were not able to obtain from either PG&E or EBRPD a list of the 245 publically-owned trees targeted for cutting. EBRPD and PG&E did not conduct a CEQA review prior to removing the trees. A last-minute effort by residents to save the largest trees was met with outright rejection. And EBRPD and PG&E did not solicit public input at any point on this discretionary program.

8. **The public did not want this tree cutting to happen.** For the past two years, Save Lafayette Trees has heard from thousands of people who demand better tree protection. We've received nearly 3,000 signatures on our Change.org petition (link: <https://bit.ly/2ZcTRmH>), and for three hours PG&E heard from the public demanding an end to this PG&E program during a special meeting on Sept. 10, 2018. This video is available on the City of Lafayette's website: (<https://www.youtube.com/watch?v=fm8DU8uD2mw>)

Mr. Doyle, I'm saddened to know of the irreversible destruction that is evidenced by many oak trees that are now reduced to mulch. PG&E is a convicted felon for their role in ignoring important safety laws and trying to cover up their actions to regulators. They are bankrupt due to their faulty management of their infrastructure. The fact EBRPD has allowed PG&E's continued unsafe and environmentally-destructive behavior in our cherished Briones Park is an unusual misstep by our hard-working and well-meaning park leaders.

Looking forward, we hope that EBRPD will join our efforts in working with PG&E and the CPUC to implement true safety improvements to our gas pipelines, whether it be addressed exposed pipeline spans or testing our aging and uninspected infrastructure. We cannot replace what has already been lost, but we can demand our utility stops unnecessary tree cutting and instead invests in true safety priorities within our community. We would be happy to discuss this issue with you at any time.

With sincere respect,

Michael and Gina Dawson,
Co-founders of Save Lafayette Trees
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Lafayette CA 94549

Cc: Dee Rosario, Ward 2 Board Member