

## **Nevada City Proposed Tree Removals – Wildfire Safety Project Explanation 8-7-2020**

Nevada County Government officials and local City officials have requested to keep certain portions of Nevada City and Grass Valley energized during a Public Safety Power Shut-off (PSPS) event. In order to do so, PG&E has identified 263 trees under, over, and within strike distance of overhead powerlines on Nevada City right-of-way's, the Pioneer Cemetery, and private properties that currently present a hazard, or prohibit safe operational access to hazard trees, in accordance with the CA PRC 4292 and PRC 4293, that require removal or trimming for the safe operation of electrical facilities during high wind events. This project is time sensitive, to implement before seasonal Fall Foehn wind patterns are likely to trigger a PSPS.

This work is in support of PG&E's Wildfire Safety Plan (WSP) and Community Wildfire Safety Program (CWSP) for Electric Distribution and Transmission, as required by the Federal Judges' Mandate No. CR-14-0175 and the Public Utilities Commission of the State of California (CPUC) Order Instituting Rulemaking 18-10-007 to Implement Plans pursuant to Senate Bill 901 (2018).

Pursuant to California Code of Regulations, Title 14. Natural Resources, Division 6. Resource Agency, Chapter 3. Guidelines of Implementation of the Environmental Quality Act (CEQA) Article 18. Statutory Exemptions, Section 15269; Emergency Projects, subsections (b) and (c), this work is exempt from the requirements of CEQA.

Many of the units identified for work are nearing or have passed the average life span for their species, such as Ponderosa Pines. Defects of individual units and the ISA Certified Arborists justification is noted in the data table with the overall letter of certification for the project. Other trees have structural defects such as multiple tops, which have a high likelihood of failure particularly during drought years and high wind events. Other prevalent pests, diseases such as Western Pine Beetle, Western Gall Rust and Diplodia blight, cause branch dieback and tree mortality. Dead branches present challenges because branch failure commonly occurs high wind events and can easily impact the powerlines. Full side trims to alleviate branch overhang is not a recommended practice for Ponderosa Pines. The significant canopy reduction resulting from a full side trim subsequently causes tree mortality, which then creates a future hazard in the community. Other highly suppressed stands exhibit height to diameter ratio defects that are due to insufficient sunlight, water, and mineral resources to be healthy, and pose a failure risk based on historical data tracked by PG&E for outages and wildfire ignitions.

PG&E exempts certain tree species, such as Coastal Redwoods and Giant Sequoias, as they have very low failure history in relation to utility line maintenance. There are numerous representations of these species within the project area that have not been slated for treatment due to their health, and lack of risk to the safe operation of the electrical system.

In due diligence, PG&E has conducted a Biological Constraints Review for this work with active mitigation measures in place. This review included a desktop sensitivity assessment, a buried site sensitivity assessment, and examined cultural resources data from PG&E's confidential Geographic Information System (GIS) databases, which showed that the area has been previously surveyed.

Due to needed hazard tree removals within the historic Pioneer Cemetery, active mitigation measures will be put in place as follows:

1. A cultural monitor is required for duration of all work on the Nevada City site.
2. A cultural tailboard will be provided to all crew members on site prior to beginning work.
3. There will be no vehicle travel within the boundaries of the cemetery.
4. Avoidance areas will be established by the qualified archaeological monitor. No crew members or equipment or staging are allowed in these zones. These zones will be delineated with flagging or tape and will be explained in the crew tailboard.
5. All removals shall be completed via crane which is prohibited from entering the cemetery boundaries and will be operated from the existing roadway.
6. If crew is required to enter the boundaries of the cemetery they shall be confined to extant footpaths where feasible.
7. No chipping or storing vegetation within the boundaries of the cemetery.
8. This cemetery's boundaries will be delineated through the use of pin flags and that area will be a zone where foot traffic will be limited, and vehicle traffic will be prohibited and allowed only on an as needed basis and in coordination with the archaeological monitor.
9. Ground disturbance is prohibited; all trees shall be cut off at the stumps--no stump grinding, or other ground disturbing activities are allowed within the cemetery boundaries.

A field tour was conducted with City staff, elected officials, and representation from the Fire Safety Committee. Due to the volume of the data and constraints in transmitting, example photos have been provided and individual unit photos of those of interest at the direction of City staff during this tour on August 4, 2020.

Further discussion during the field tour included mitigation funds for some removals, whereas sites such as the Pioneer Cemetery have natural regeneration and seedlings on site that will be avoided during operations to ensure proper forest succession in the stand. PG&E is open to discussions to replace specific units with compatible species near our infrastructure, or placement where they will not impede safe operation.

Our goal is to obtain project approval on August 20, 2020, provide specific notices for road closures needed for crane tree work, with a proposed start date of September 9, 2020 provided all permits and operations are in place. Our Licensed Timber Operator (LTO), Mountain F. Enterprises is meeting with American Crane on August 7, 2020 to refine their work plan and we will have a better idea of implementation timeline at the Planning Commission meeting.