

Dear Ombudsman,

We respectfully ask the Hazardous Materials Commission of Contra Costa Health Services to review public safety concerns residents of the city of Lafayette have relative to the natural gas pipeline owned and maintained by PG&E. In relation to these concerns, we ask for review of PG&E Community Pipeline Safety Initiative (CPSI). PG&E's CPSI assurances for public safety entails removal of trees and vegetation along 6,750 miles of pipeline that PG&E owns and operates in California. The city of Lafayette and PG&E struck a CPSI agreement March of this year that calls for the removal of 272 trees across the city. Since then, pertinent public and pipeline safety concerns have been raised by residents of our city.

We hope to have the assistance of the Commission in attainment of answers and address from PG&E for these concerns that we feel are more serious and more readily remedied by true public safety measures than unproven tree remediation efforts in light of the accident in San Bruno, the subsequent findings of the National Transportation Safety Board (NTSB), and the conclusions by a US federal grand jury in regards to PG&E's pipeline integrity management practices. In short, we want the right and best pipeline safety measures for our city and we hope the Commission can assist us in working with PG&E to procure this outcome for Lafayette.

Resident Concerns for Natural Gas Pipeline Safety with Lafayette city boundaries

1 - There is an approximately 4 feet length of natural gas pipeline laying exposed feet away from a well trafficked Lafayette Moraga trail. Can the Commission assist us in ensuring PG&E is addressing this? (Attachment 1). This exposed segment was discovered during a walk with PG&E representatives and Lafayette residents reviewing trees marked for removal. The PG&E reps said this was of a high priority nature, but we know of no action taken. This exposed segment does not seem like it would meet regulations for pipeline burial depth nor public safety in general. We believe it conveys a lapse in ground patrol and/or reporting and lack of subsequent remedy. When asked for patrolling records, we received information only as to the most recent patrols, in April 2017, after the agreement was made.

2 - Can the Commission please determine with PG&E the status of installation of automatic or remote operation shut-off valves in the city? PG&E will not verify the existence of, or plans for shut-off valves in Lafayette. If there are none, why not? The pipeline runs right through our neighborhoods, as did the pipeline in San Bruno. It was determined by the NTSB that the presence of automatic shut off valves may have lessened the severity of the accident in San Bruno.

3 - Can the Commission please review with PG&E their documented knowledge of the pipeline infrastructure within Lafayette city boundary and all attendant components and

related testing and maintenance implementations, both historically recorded and currently scheduled? Residents have asked many questions as to PG&E's detailed knowledge of the particular infrastructure of the pipeline that runs through Lafayette. Questions including age of pipeline segments, soil integrity around pipeline, particularly along Creekside embankments, pipeline bury depths and compliance to standards, presence of any seam welds, historic record of surveillance and testing, any areas of inadequate cathodic protection within city boundary, ability to smart test (pig) lines, etc. Responses from PG&E are not complete, seem ambiguous, and are outstanding for well over a month. The inadequacy of detail combined with the lag/lack of response conveys a deficiency of more intimate knowledge of the pipeline that would necessarily ensure pipeline integrity management, safe operation, and detailed knowledge that could matter to first responders in an emergency pipeline situation.

In investigating the incident at San Bruno, the NTSB has called on pipeline operators and regulators to ensure that the records, surveys, and documents for all pipeline systems accurately reflect the pipeline infrastructure so that maximum safe operating pressures are accurately calculated. Proof that PG&E has detailed documentation relative to our pipeline is tantamount to PG&E's basic assurances that they are maintaining the safest and most reliable gas system for our community.

We have been told that PG&E is concerned infrastructure information may be of possible interest to terrorists so it is not on record with city planning or public works. While the idea that nefarious interests may be piqued, it seems sensible that pipeline infrastructure and integrity testing schedules and documentation should be available, in confidential record, to city officials charged with public safety. Also, the general pipeline maps are already widely available online.

The City of Lafayette and PG&E CPSI Agreement

The basis for the CPSI agreement to remove 272 trees across the city is "to ensure that first responders and safety crews have immediate access to their pipelines in an emergency and to ensure their pipelines are not being damaged. PG&E has warranted that tree roots may cause damage to pipes by exposing them to corrosion." The city made the agreement in good faith, in the interest of public safety, and in deference to PG&E's expertise in pipeline management.

Regarding the first claim that trees may hinder first responder access to a pipeline emergency, I have spoken with Contra Costa County Fire Marshal Robert Marshall, and he relayed that his department did not have any involvement in rolling out the CPSI program. We also discussed first responder protocol in event of gas pipeline related emergency. Emergency fire personnel would call PG&E to get information as to the location of a breach, diameter of the associated pipeline and most importantly, find out current status of gas flow (shut off or in process of shut

down). First responders would not drive emergency vehicles directly into an area of flowing gas, whether there was a tree in the way or not.

Regarding trees causing damage to pipelines, PG&E has not provided any corroborative 3rd party data to this effect that would necessitate tree removal to such an extensive degree. There is one study that PG&E sponsored that they no longer refer to, perhaps because it is inconclusive. The city and PG&E have a disagreement as to whether or not PG&E is required to obtain discretionary permits under the provisions of the city's Tree Protection Regulations. This is documented in the agreement. It is unclear to city and to residents if PG&E has authority or any regulatory precedent exists to give them authority to remove trees without being subject to proper municipal permitting process. Residents believe that CPSI actions in Lafayette should be subject to CEQA review for human health and environmental impact reasons including but not limited to: impact of tree removal on soil integrity along creek embankments and residential property slopes; loss of vegetation serving as informal safety barriers to steep creek embankments along trails; loss of tree canopy and shade on expanses of public access trails and in residential neighborhoods, use of herbicide on stumps left after removal (PG&E confirmed they would not be removing tree roots and herbicide usage would be considered to impede regrowth of trees); loss of habitat for local and migratory fauna.

Also, residents are not assured that mitigation process also includes remediation of areas where trees are removed or that alternative measurements for ensuring pipeline integrity were considered in the first place. It seems PG&E is using unproven public safety claims to circumvent possibly applicable CEQA and EIR. The County of Santa Cruz rebuffed further CPSI discussions with PG&E, asking for CEQA review. We have attached the letter for your reference (Att.2) . The city of Palo Alto is also asking for the same review and to date, PG&E has not complied with their request. We do not believe either of these communities are less safe than ours would be if their trees remain in place.

We ask that the Commission for Hazardous Materials take all of these concerns into consideration and advise us as to next steps in receiving answers and action that would provide the city of Lafayette with true public and pipeline safety measures as well as consult as to the validity of the basis and process of the CPSI agreement. Thank you for consideration of these matters, we look forward to your response.

Respectfully,
Gina and Michael Dawson
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Link to recent local article re: CPSI agreement in Lafayette
<http://www.lamorindaweekly.com/archive/issue1107/After-public-outcry-PG-and-E-delays-tree-removal-plan.html>