

**PACIFIC GAS AND ELECTRIC COMPANY  
Wildfire Mitigation Plans Discovery 2022  
Data Response**

PG&E Data Request No.:	CalAdvocates_005-Q04		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_005-Q04		
Request Date:	December 23, 2021	Requester DR No.:	CalAdvocates-PGE-2022WMP-05
Date Sent:	January 10, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to the article *Humboldt County Issues Stop Work Order, PG&E Removes Contractor on EVM in Sohum After Complaints/Video by Residents*, published in Redheaded Blackbelt on December 16, 2021 (the article).<sup>1</sup> This article describes activities performed by a contractor allegedly performing EVM work for PG&E in Humboldt County.

**QUESTION 04**

The article alleges that KDF had left logs and chips in the ditch, plugged culverts, and damaged the shoulders of a road. Are these allegations accurate with respect to KDF's work in this area? If not, please describe the inaccuracies or omissions in the article.

**ANSWER 04**

PG&E objects to this request to the extent that it asks PG&E to identify all of the accuracies or inaccuracies in the referenced newspaper article. Subject to and without waiving this objection, PG&E understands that KDF completed a majority of the work within the area; however, there were other vendors present and working within the area during the same time period. PG&E's VM supervisor conducted a field review of Thomas Road on December 17, 2021. No significant volume of chips and/or logs were found within the roadside ditch and county right of way, but additional clean-up was required. At the time of the field review, culverts appeared to have been plugged for several years, up to 2-3 feet of soil was above the mouth of the culvert, that was not a result of current work. The shoulder of the road had damage, which to some degree may have been associated with work being conducted; however, the shoulder was still operable for motorists. Due to the sheer volume of work being completed, clean up did not occur concurrently with tree work but was completed after the tree work occurred.

---

<sup>1</sup> <https://kymkemp.com/2021/12/16/humboldt-county-issues-stop-work-order-pge-removes-contractor-on-evm-in-sohum-after-complaints-video-by-residents/>.