

operating procedure. However, we request a change in the definitions of the Draft Rule to allow a professionally certified arborist to also be supported by a Supervised Designee. Expanding the scope of the arborist falls within the scope of Wildfire Mitigation Plans and Vegetation Management Plans already developed under the guise of the California Public Utilities Commission.

Though we support the Board's intent to enforce environmentally sensitive forestry practices, we urge you not to implement the Draft Rule in the current form. Instead, we request that the Board revise the referenced requirements and provide appropriate policy to allow utilities to perform work responsibly.

We are happy to work with you to attain our mutual goals of land maintenance and forest health. Should you have any questions or wish to discuss this matter further with us, please contact Michelle Novotny at (415) 627-8665 or mnovotny@sfwater.org. Thank you for your consideration.

Sincerely,

Steven R. Ritchie

Steven R. Ritchie
Assistant General Manager, Water Enterprise