



County of Santa Cruz

COUNTY ADMINISTRATIVE OFFICE

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CARLOS J. PALACIOS, COUNTY ADMINISTRATIVE OFFICER

May 27, 2020

Ms. Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA
Via email: wildfiresafetydivision@cpuc.ca.gov

Dear Ms. Thomas Jacobs,

INTRODUCTION

As a party to proceeding Rulemaking 18-10-007, the County of Santa Cruz offers the following comments on draft resolutions WSD-002 and WSD-003, addressing the Pacific Gas and Electric Wildfire Mitigation Plan 2020 (WMP).

The Draft resolutions include a comprehensive and informed critique of the WMP. The County of Santa Cruz supports the conditions in both resolutions that require PGE to correct deficiencies in the plan while continuing to implement important hazard mitigation. The conditions address many of the County's concerns with PGEs overly general "one size fits all" strategy for hazard mitigation, breakdowns in performance in the field implementing mitigation, and the need for improved community engagement. We suggest that additional areas of deficiency be addressed in the resolutions and that certain conditions be added or elevated in importance to remedy the deficiencies that exist.

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VEGETATION MANAGEMENT PROGRAM AND PRIORITIZATION

The resolution should address the fact that the PGE vegetation management plan is a one size fits all approach for a large and diverse geography, when it should be tailored to local environmental conditions.

The WMP lacks analysis and evidence for why the particular forms of vegetation management and areas to be treated have been chosen, and how much risk reduction would result compared to alternative approaches that are more refined, would create less environmental impact, and be less likely to be at cross purposes with other community and local government programs, while still reducing risk. For example, community organizations and government agencies have invested heavily in correcting environmental degradation that led to loss of protected fish populations in local waterways. This long term investment in biodiversity is contravened by a one-size-fits all approach to vegetation removal/management in riparian corridors. We request that the Division add a condition addressing this lack of analysis.

Further, the resolution identifies that PGE is required to discuss how environmental impact and community impacts were considered and addressed in the plan but does not require as a condition of approval that PGE provide that information. We request that the information be required in the first quarterly report.

The resolution correctly points out that PGE has not provided risk assessment information that demonstrates that resources are properly allocated between hardening strategies and vegetation management, the two largest sources of ignition events, or that vegetation management is targeted to highest risk areas (Deficiency PGE - 24, Class B). Similarly, Hazard Tree mitigation is not demonstrated to be targeted to highest risk individuals or species (Deficiency PGE- 18, Class B). The resolution correctly states that the plan should focus on at risk trees, "rather than every tree within striking distance."

These are examples of the practice of pursuing mitigation in a generalized manner, as opposed to targeted mitigation based on data. A less generalized approach will have environmental, community, and economic benefits as well as producing more effective mitigation.

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Regarding EVM, the County strongly supports Condition PGE-26, Class C, which requires an analysis of the effect of increased clearance distances to be provided in PGE's 2021 WMP. The analysis should consider various alternative lateral and overhead clearances to establish optimal post-trim clearances in different settings. Further, the designation should be changed from Class C to Class B and recognizing the fact that the EVM program is currently underway, an outline for the analysis should be submitted with the first quarterly report.

The County supports Condition PGE-24 Class B, which calls for PGE to explain its method and process for prioritizing between system hardening and vegetation management to reduce the probability of ignition.

FIELD COMPLIANCE WITH THE PLAN AND QUALITY OF WORK

In order to carry out hazard mitigation in compliance with the plan and to comply with Federal, State, and local resource protection regulations, PGE relies on internal protocols that prescribe how work should be accomplished in the field. The resolution identifies that PGE has documented quality control problems with inspections, Deficiency PGE-19, Class B: Low pass rate on EVM QA. This deficiency in quality control extends to environmental protection, correct identification of environmental resources and deploying of biologists in the field in sensitive areas.

To address the quality control deficiency a condition should be added that requires PGE to track and periodically report incidents in which environmental protection protocols were not followed or implemented properly by contractors or others, and incidents in which appropriate permits from local, State and/or Federal agencies were not obtained, or the conditions of issued permits were not fulfilled. The report should include data on the performance record of contractors that are employed to perform vegetation management so that the records of contractors may be compared, and benchmarks established for ability to adhere to protocols for environmental protection. Further, the condition should require PGE to revise internal protocols to require that a qualified professional biologist be on site with crews in areas with sensitive resources. Local, State and Federal trustee agencies should be consulted on identifying these areas.

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GENERAL COMMENTS

Recognizing the urgency of hazard mitigation, the resolutions and conditions should require that PGE come up to the standard for miles and circuits of system hardening, commensurate with the other large utilities, in a compressed amount of time.

Thank you for the opportunity to comment on the resolutions regarding the Wildfire Mitigation Plan.

Sincerely,

Handwritten signature of Carlos J. Palacios in black ink.

Carlos J. Palacios
County Administrative Officer

cc: Jason Heath, County Counsel
Daniel Zazueta, Assistant County Counsel
Kathy Molloy, Planning Director
Paia Levine, Assistant Planning Director
Matt Johnston, Environmental Coordinator
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