Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

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TO: California Public Utilities Commission

RESPONSE TO SOUTHERN CALIFORNIA EDISON 2021 WILDFIRE MITIGATION PLAN UPDATE

Dear California Public Utilities Commission:

On behalf of the County of Los Angeles (County), please accept the following comments in response to Southern California Edison's (SCE's) 2021 Wildfire Mitigation Plan Update. This letter represents comments from the County departments of Regional Planning (DRP), Public Works (PW), and Fire (FD), as directed by the County of Los Angeles Board of Supervisors.

Thank you for the opportunity to provide comments and express our long-standing reservations about SCE's ability to provide superior customer service and natural resource protection while appropriately managing wildfire risk. Their lack of clear programmatic objectives and performance outcomes, coupled with troubling accounts of customer interactions, severely hinders their ability to meet their risk reduction goals. It is hoped that SCE will gain additional insights and make measurable changes based on these comments, and that your Commission will assist the County in helping SCE make these changes within their regulatory obligations.

List of Departmental Comments

Dept.	Section	Comment
DRP	Section 4.2 Understanding major trends impacting	A. Ensure that the service territory and utility monitoring of known local conditions coincides with the Very High Fire Hazard Severity Zones (VHFHSZ) of the County General Plan, Santa Monica Mountains (SMM) North Area Plan, and SMM Local Coastal Plan. These plans include goals and policies discouraging development in VHFHSZ where there

	ignition probability and wildfire consequence:	is insufficient access and supporting infrastructure. These plans recognize the unique natural resources and high fire risk factors in these areas and that vegetation clearance for new development and extension of new utility services shall be considered in major trends related to continued development in such areas.
	Section 4.2 Understanding major trends impacting ignition probability and wildfire consequence:	B. What is SCE doing in terms of mitigation besides active monitoring of fuel and identifying high risk areas to limit Public Safety Power Shutoff (PSPS) events? Aside from vegetation management, SCE should pursue broader infrastructure protection such as insulation of conductors or undergrounding infrastructure.
		C. SCE should pursue programmatic permitting authorization from agencies based on demonstrated ability to manage customer service issues and provide quality controls. Demonstrated experience meeting these local metrics will allow SCE to forego individual approvals on a site-by-site basis.
DRP	4.2.1 Service territory fire-threat evaluation and ignition risk trends:	D. SCE should coordinate with the permitting agencies so that fire threat maps are available in geospatial software. SCE should plan vegetation management activities well in advance of anticipated fire seasons and work with permitting agencies to obtain authorizations where needed. Quarterly reports of activities planned for the next quarter would assist with permit authorizations.
DRP	4.2.3 Macro trends:	E. Climate/weather trends and environmental factors such as drought, high winds, invasive pests, and vegetative diseases are relevant and continuing issues. SCE vegetation management programs should increase and adapt existing monitoring, reporting, and tracking of critical vegetation management needs to reduce future immediate risks or emergency situations. More frequent field surveys of vegetation conditions near or adjacent to utility infrastructure should be conducted and acted upon with proactive vegetation management actions such as trimming, pruning, thinning, or treating existing vegetation.
DRP	5.2 The objectives of the plan:	F. SCE should incorporate environmental habitat considerations into its fuel mitigation plans and work with local agencies to ensure consistency with existing habitat protection policies.

DRP	5.4 Planning for workforce and other limited resources:	G. SCE should aim to increase staffing in critical roles related to vegetation management, including fuel arborists, biologists, and permitting/entitlement staffing.
		H. SCE should develop a training program for the contract workforce involved in vegetation management programs and permitting/entitlements to address the unique needs of the SMM North Area and SMM Coastal Zone. Specifically, the program should focus on coordination and future-oriented permitting applications that account for the regulatory requirements and the Coastal Zone and Significant Ecological Area (SEA) entitlement processes.
DRP	5.4 Planning for workforce and other limited resources:	I. When contract workers in the field encounter members of public and various stakeholders, these contract workers should be prepared to respond to inquiries about the need and/or authority to conduct vegetation management on private property, to direct the public to resources provided by SCE, and to direct them to the local authority for permitting confirmation.
DRP	7.3.4.9.1 Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations	J. SCE's existing hazard tree or vegetation removal processes provide for notification and permitting timelines but should be observed through regular monitoring and initiated to ensure that Priority 1 (a.k.a. P1) scenarios of progressing imminent threats to public safety do not create scenarios where typical engagement and pro-active permitting are cast aside for emergency permitting without outreach or engagement.
DRP	7.3.5 Vegetation management and inspections:	K. SCE should follow guidance from the County on managing infested trees, such those affected by the shot hole borer and golden spotted oak borer before infestation can spread to other trees. Thorough investigation and documentation of infestation status shall be completed by a certified arborist or biologist. If infestations are not treated or addressed promptly, the number of trees that are required for removal in the future could increase.
		L. SCE should coordinate with the County to submit adequate documentation and evidence of reported dead or dying trees that have risk of failing within striking distance of SCE lines and equipment. Drought conditions can affect the health of trees. Therefore, following periods of extended drought, SCE should resurvey trees in proximity to utility infrastructure. If surveys reveal trees likely to die, permitting submittals for

		any trimming or removal shall be promptly submitted in coordination with the County. Preventable delays resulting in a need for emergency permitting should not be allowed to occur.
		M. What is considered a significant public impact? Does SCE conduct informative workshops on a more frequent basis? What about reporting and informing of regular activities?
DRP	7.3.5 Vegetation management and inspections:	N. SCE makes note of efforts to manage environmental compliance by integrating schedules of environmental/agency permitting timeframes, bundling of permit package submittals, pursuing programmatic agency permitting, and regularly engaging agencies with upcoming work activities. However, no specific programs have been suggested, implemented, or coordinated with DRP to achieve this desired result. SCE should engage the County with a proactive plan that accounts for necessary permitting timelines, including associated surveys, studies, and mitigation actions. The permitting program should be focused on vegetation that is not yet deemed hazardous but will likely require more extensive work due to site conditions and environmental factors that are conducive to more growth or encroachment into utility infrastructure than can be maintained through typical pruning or trimming activities. The program should be informed by the ongoing vegetation monitoring and maintenance activities to identify those areas that are not yet approaching threats to public safety, but if left unmanaged would result in threats to public safety. This proactive permitting program would help reduce the need for, and frequency of, emergency vegetation removal activities. While emergency vegetation activities can be mitigated, SCE should be aware of the many unique environmental and biological settings within the Santa Monica Mountains Coastal Zone and the County's SEAs, many of which cannot be restored to their previous natural state even with mitigation, or only after significant time and resources are spent on mitigation.
		O. Existing SCE pole brushing programs remove vegetation around poles to provide for a 10-foot radial clearing to prevent fire from sparks or other equipment failure. The existing pole brushing program brushes 80,000 poles on an

DRP	7.3.5 Vegetation management and inspections:		annual basis. The 80,000 poles do not include all poles within high fire hazard areas. SCE should conduct preventative pole brushing on all poles within high fire hazard areas. SCE should seek to increase the frequency to bi-annually, especially in years following heavier precipitation. The timing of brushing should occur following the rainy season to manage spring growth and prior to autumn windy conditions that lead to extreme fire hazard conditions.
		P.	Current vegetation management programs are aimed at meeting regulatory requirements such as the California Public Utility Commission's (CPUC's) General Order 95 Appendix E recommended clearances. SCE should inspect existing infrastructure and recommend and conduct trimming under the guidance of trained and certified arborists to ensure proper techniques are implemented. Annual maintenance to minimum standards may result in imminent safety scenarios during the following year, prior to the next scheduled maintenance. Additionally, trained and certified biologists/arborists should provide specific recommendations on trimming for regulatory compliance to ensure the longevity and protection of the vegetation as an important environmental resource. Observing regulatory trimming and maintenance while considering vegetative health can reduce the future need to drastically trim, cut, or otherwise remove vegetative resources due to improper techniques.
		Q.	SCE performs supplemental vegetation inspections to verify that certain circuits are free from vegetation encroachments into the minimum vegetation clearance distance. These inspection patrols are conducted on foot or by driving to sites and occur on an annual basis. Increased frequency of patrols should be considered, especially for those areas identified as having the highest risk factors for vegetation-related utility fire risk. Inspections that reveal specific areas needing additional maintenance should be reported and those specific areas should be scheduled for additional maintenance or inclusion in the upcoming maintenance cycle, rather than waiting for the bulk of the area to recur in the vegetation management cycle. SCE should coordinate with the permitting agencies to identify early on which permits or processes will be required. This would allow processing and regulatory requirements to occur while also allowing proactive vegetation maintenance activities to continue on schedule. Increased frequency of inspections

		and reporting would reduce the need for future emergency permitting actions due to neglected inspections or extended timelines for vegetation maintenance work.
DRP	7.3.5.1 Additional efforts to manage community and environmental impacts:	R. Areas of Concern or areas that are identified as priority vegetation management zones should be mapped in geospatial software to be made available to the public. Additional community engagement should be implemented in these areas to inform the public about fire risk and proposed vegetation management.
		S. All tree removals and major vegetation removals should be mapped in geospatial software and provided to the public and the County. This data is critical for maintaining an accurate inventory of completed work, assessing trends across the region, and ensuring accountability for environmental and community impacts.
DRP	7.3.5.5 Fuel management and reduction of "slash" from vegetation management activities:	T. SCE should consult with the County on appropriate protections for native vegetation types in the SMM Coastal Zone.
		U. SCE should consult with County on the need for mitigating tree removals.
DRP	7.3.5.16.1 Hazard Tree Mitigation Program (VM-1):	V. Hazard trees outside of the standard fuel modification radius may require mitigation tree planting because the activity may constitute "development" under the Coastal Act and may not be exempt from Coastal Development Permit requirements.
DRP	7.3.5.19 Vegetation Inventory System (VM Work Management Tool – Arbora – VM-6):	W. SCE should dialogue with the County to identify areas with habitat considerations so that the appropriate permit review mechanism can be incorporated into the process.
DRP	7.3.5.20 Vegetation management to achieve clearances around	X. There is concern that expanded tree removals and expanded vegetation clearances beyond the minimum recommendations will damage existing habitat without evidence of efficacy.

	electric lines and equipment:	
DRP	7.3.6.16.2 Dead and dying tree removal:	Y. Provide protocols on how SCE determines if a tree is dead or dying. What effort is made to remove only damaged parts of the tree while maintaining an individual tree in place?
DRP	7.3.9.1 Adequate and trained workforce for service restoration (SCE Emergency Response Training DEP-2):	Z. Does SCE have agreements with County agencies, other than DRP, for work on SCE infrastructure when located on public property/public right-of-way?
DRP	7.3.10 Stakeholder Cooperation and Community Engagement	AA. SCE should expand their community or neighborhood notification program to notify residences of planned vegetation management work.
		BB. SCE should provide information to the community on planned annual vegetation management work areas and/or ongoing vegetation management work areas with estimated timeframes to raise community awareness and understanding of the required ongoing vegetation maintenance. Community notification can be maintained on a webpage and distributed in semi-annual newsletters or a similar mailing.
DRP	7.3.10.1 Community Engagement:	CC. Major vegetation management and tree removals occur on a rolling basis, which requires constant engagement with impacted communities. Efforts should be made to conduct community engagement with communities within Areas of Concern prior to planned vegetation management and tree removal efforts. These efforts should be done comprehensively, rather than piecemeal or on an emergency basis.
		DD. SCE should update and include the County on scheduled outreach.
DRP	Table 12: Mitigation	EE. Please clarify the DEP-1.2 meeting information in the chart (e.g., 149 agency meetings; 9 virtual community

	initiative financials:	meetings; 45 Powertalks; etc.). The County would like more information on meetings conducted with the public, specifically within communities in the SMM North Area and the SMM Coastal Zone. How many of these meetings were proactively scheduled by SCE, or were the result of the County requiring SCE's attendance?
PW	Table 2-1 Adherence to Statutory Requirements (Item No. 67):	FF. The list of at-risk and fast growth tree species being considered for removal in the County should be provided to the County for review and included in the report. The Supplemental Filing noted in the Table should be provided for public and agency review.
PW	5.4.1 Target Role: Vegetation Inspections:	GG. All personnel assigned to 1) evaluate and recommend trimming of trees in the County; 2) communicate with constituents; 3) oversee the trimming crews; and 4) inspect trimming should be International Society of Arboriculture Certified Arborists.
PW	Section 7.3.5 Vegetation Management and Inspections:	HH. Community outreach should be provided to explain the enhanced clearances in CPUC General Order 95 Rule 35. This outreach should explain why and how the additional trimming is being done, the arboricultural credentials of those performing and overseeing the trimming, and how they will be notified if tree(s) on private property will be trimmed by SCE. PW should be notified at least one (1) week in advance of any tree trimming within the County's public road or flood control right-of-way and should be consulted for approval on any heavy pruning or removal of public trees.
FD	Action SCE-17:	II. There are occasions when homeowners are unwilling to allow power line safety tree work on their properties. In these cases, SCE tries to make contact and educate the homeowner on requirements, but some owners still refuse. The County Forester is typically brought in to assist SCE to gain compliance and writes an Official Inspection Report (410B) to notify non-compliant owners. If the owner still refuses entry after 30 days, an Inspection and Abatement Warrant is written and signed by a local judge. At this point, SCE coordinates with the County Forester who writes the warrant, and the Sheriff Department to help serve the warrant, complete the work, and mitigate the hazard. The necessity of a warrant is rare but has occurred a few times over the last ten years in the Topanga Canyon area.

FD Response

SCE's wildfire mitigation plan is consistent with and conforms to requirements defined in County Fire Code Sections 325.1.1, 325.1.2 and 325.1.3; the California Code of Regulations Title 14, Division 1.5, Chapter 7, Article 4 – Fire Prevention Standards for Electric Utilities; and California Public Resources Code (PRC) Sections 4292, 4293 and 4294.

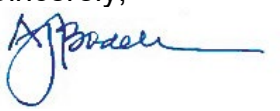
The FD routinely coordinates with and assists SCE personnel to implement power line and pole safety requirements. In the months of July, August and September, the County Forester jointly inspects all power lines and poles in the VHFHSZ with SCE personnel through a program called Operation Santa Ana. This program focuses on appropriate line clearance distances, hazard tree mitigation, and pole clearance confirmation. Joint inspections are typically completed after SCE's routine maintenance in prior months and are intended to be compliance confirmation inspections. When an occasional Tree-line Contact is identified, it must be corrected within 24 hours, and be subject to a confirmation inspection shortly after.

Over the last twenty years, but more focused in the last three years, SCE has been working toward removing all hazard trees with potential to fail into (from the side) or onto (from above) power lines. This conforms with County Fire Code Section 325.1.3; the California Code of Regulations Title 14, Division 1.5, Chapter 7, Article 4; and PRC Section 4294.

In summary, SCE works well with the County Fire Department where clear objectives and FD supervision is provided on pole safety and power line issues. However, County supervision is not feasible on SCE's vegetation management program, where most issues remain. SCE would be well served to focus on significant reforms to their quality control and procurement procedures for contract landscape firms hired to perform their vegetation management work. SCE and their contractors need to conform to local permit requirements at all times, communicate myriad programs in a clear and concise manner to homeowners who can then understand the impact of SCE's vegetation management on their own trees, and, in general, make a stronger commitment to providing enhanced customer service and community engagement.

Thank you again for the opportunity to provide comments. For questions or for additional information, please contact Robert Glaser of the Coastal Permits Section at (213) 974-0051, or rglaser@planning.lacounty.gov .

Sincerely,



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Director of Regional Planning

AB:DD:MG:RG:CR

c: Los Angeles County Department of Public Works (Pestrella, Doudar)
Los Angeles County Fire Department (Osby, Duvally)