Response to WSAB April 15 meeting, Recommendations on the 2020 Utility Wildfire Mitigation Plans

Dear Commissioners:

Please consider the following concerns about the performance of the utilities and the structure of the current mitigation plans. I live in the Santa Monica Mountains. These concerns are shared by many here.

In summary, my recommendations follow wildland scientists: house hardening, eliminating development in high fire risk areas, stopping high fire risk human activities on or before red flag days, removing invasive grasses and black mustard. And burying the electrical wires, the Utility contribution.

Thank you,
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1. Developing and Tracking Community Engagement Activities

The lack of coordination in recent devastating fires, such as Woolsey and Camp, is no surprise.

It is well-known that even with annual evacuation drills and a committed population, the communication and coordination between various agencies has been poor.

The rollout and implementation of the PSPS in Malibu were extremely deficient: There was no infrastructure to support the activation; The sequence of planned events was completely unrealistic, starting with the determination 48 hours in advance that there would be a scheduled event. And that is just the beginning of the problems experienced. The PSPS was almost unanimously rejected in multiple Edison presentations, with community members outlining exactly the problems that emerged, particularly with the PG&E shutoffs last year. Despite really desperate plications to the CPUC to halt this travesty, the CPUC was silent.

I understand that at some point, possibly in 2018, the word mitigation was removed from the CPUC regulation, and Edison exploited this loophole. The example of SDGE's apparently successful treatment of Borrego Springs was ignored. The Santa Monica Mountains, with its comparatively very dense population, should have dictated that the level of detail and planning would be geometrically increased, not really, pathetically simplified.

It is doubtful that data from Edison can be relied upon. They denied a power shutoff in Big Rock during the Woolsey Fire, but they occurred at least twice.

There is no real point in reviewing Edison's assessments. Community outreach, comment and engagement are mandatory for PSPS revision – if PSPS is at all advised – and for action in the

event of wildfire. The communities are the ones involved. The action utilities should take is burying the wires, starting with highest risk areas, and providing backup batteries.

2. Working with Local Government Liaisons in Emergency Situations

Again, if there is no direct input from communities, government agencies will obfuscate the reality of implementation and events during evacuation and wildfire.

Topanga Community Emergency Preparedness, t-cep http://t-cep.org/emergencystatus/ is a proven model which, with additional funding could serve the SMM. A new website does not need to be developed. Theirs should be expanded.

3. Sharing Developing Science and Situational Awareness Data

How valuable wildfire modelling is, beyond what is already known is possibly questionable.

Installation of many of the Davis Vantage Pro 2 throughout the SMM would significantly increase weather predictability. With internet connections, it can be used by NOAA. There should be no proprietary knowledge here.

4. Future Proofing Utility Pilots and Aligning Pilots with Climate Goals

Microgrids with solar panels, or other forms of locally distributed renewable energy and backup batteries are technologies which have already been installed and should be vigorously evaluated and implemented in the immediate future, as noted in your observations.

The incentives for private shareholder control of utilities is aligned with neither community needs nor measures required to address climate change. That is an inherent conflict. There are also profound implications for energy distribution and investment across the western states.

5. Fuel Management, Removal of At-Risk Species, and Scientific Review

This section should be revised to first and foremost address house hardening. Although the Governor and CPUC were given documents outlining these measures, e.g. From the House Outward, R Halsey, and the California Native Plant Fire Recovery Guide, they have been ignored. The very use of the term “fuel management” sets the structural stage for futile actions. We are living in wildland habitat, it is not “fuel”. Proximity of homes to high-fire risk areas should be reduced. Human actions which start fires should be stopped on and perhaps just prior to high fire risk days. Again, wires must be buried. And non-native grasses and black mustard must be removed.

There is no science behind the new tree height regulations and the extensive cutting and removal of trees by Edison.

Previously, in extending clearance between lines and trees to 18” , the CPUC noted that there was no scientific evidence for this additional restriction so that “we must instead rely upon the

compliance filings of the utilities, which contain relatively scanty information; a meager workshop report; the Settlement, which contains little factual material upon which to base a standard; and the comments received in response to D.96- 09-097, which consist in large measure of opinion and argument, rather than hard data."

In enacting these new tree height restrictions, where is the data that indicate this is helpful? CPUC's recommendation was to protect worker safety and reliability of the system and cause as little disruption to the natural environment and the aesthetics of affected property as possible, to the extent that we offer guidance about trimming beyond specified minimum clearances." If these limitations are enacted with their 18ft height limitation within 20 ft of wires and 30 ft height within 50 ft, there will be no oaks or sycamores in the front yards of usual sized properties. And when added to tree restrictions on distance from the house, the tree cover will be very limited.

Further, as referenced in your observations, removal of native plants will cause type conversion. Non-native grasses and black mustard will then prevail, which will act as fire accelerants, increasing the risk of wildfire. Non-native seeds will be distributed to adjacent wildland, further contributing to type conversion and increased wildfire risk.

Climate change cannot be ignored. We have an absolute responsibility to decrease heat production and increase carbon sequestration. This cannot be accomplished by limiting front yard plants to shrubs. Trees decrease heat gain of homes and resultant energy usage. Shade decreases ambient temperature and heat gain in pavement. Trees provide habitat. And trees and native shrubs are ember catchers.

I oppose these ill-advised, scientifically and everyday experientially unsupported limitations in the height of trees.

As noted in your observations, experienced and published wildfire scientists should determine human interventions in wildland habitat. California Native Plant Society should be an advisor.

Other options, to reduce electrical ignitions, such as undergrounding wires, use of protective coating of wires and other measures should be used. A joint, cost-sharing agreement for undergrounding wires between Edison and property owners might be promoted, when possible and if not, Edison should bear the cost for undergrounding the wires.

6. Analyzing Near Misses

Independent reviewers should assess the actual events during a PSPS. First they will need a method to determine when power was shut off. They cannot rely on Edison's report. Increased use of the Davis Vantage Pro 2 weather stations will facilitate this.

7. No comment

8. Criteria to Prioritize Reducing PSPS Events for Critical Infrastructure

Edison has refused to consider line hardening with covered conductors except in specific incidences.