Jesse Arreguin, Mayor
Susan Wengraf, Vice Mayor

December 13th, 2018

Michael Picker, President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Submitted via email: **public.advisor@cpuc.ca.gov**

RE: Proceeding R. 18-10-007 Wildfire Mitigation Plans

Dear President Picker,

The scale of climate impacts on California's weather patterns and the dangers these impacts present to our communities in and near the Wildland-Urban Interface (WUI) is massive, requiring wide-scale mobilization on every front. We now face a public health and human welfare crisis caused by wildfire, whether by smoke and toxic ash or wildfire raging through our communities.

Berkeley, California is currently a city of 122,000 people with a land area of 10.5 square miles and high population density of 11,592 persons per square mile. Our boundaries are shared with the cities of Oakland, Emeryville, Albany and unincorporated Kensington. We touch the bay to the West and meet the East Bay Hills ridge line to the East. Berkeley is an old city formed in the late 19th Century. Berkeley expanded rapidly after the 1906 earthquake and again after the end of World War II quite a few years before the Hayward fault line was mapped and an even longer period before the first fire hazard map was drawn for the State of California. Berkeley is also home to the University of California with a total student population of 42,000 and staff and faculty of nearly 3,000.

Given Berkeley's high population density, in combination with our proximity to the wildland urban interface zone and our location on the Hayward Fault with elevated risk of fire following earthquake, we have serious concerns about the safety of the electric grid. **We make the following recommendations and comments** without having the benefit of professional input from climate scientists but relying on common sense and observed experience of these increasingly tragic fires occurring throughout California.

- The objective of the plan is to save lives throughout California and substantially and aggressively reduce the fire risk in state designated Extreme and Very High Hazard Zones.
- Furthermore the plan's primary focus is to prioritize enacting state of the art fire mitigation strategies targeting to mitigate fire risk in all California communities in state designated Extreme and Very High Hazard Zones.
- These requirements apply to both electric utilities and communications services.

2180 Milvia Street, Berkeley, CA 94704 • Tel: (510) 981-7160 • TDD: (510) 981-6903 • Fax: (510) 981-7166
E-Mail: swengraf@cityofberkeley.info

NOTIFICATIONS

- Notify potentially affected County and Municipal authorities whenever internal deliberations are being made to de-energize electrical lines.
- Request input from local authorities on hyper-local weather and humidity conditions and seek local recommendations for ongoing monitoring or decisions to de-energize electrical lines.

VEGETATION

- Removal of any vegetation greater than 3 inches high with a minimum clearance of 5 feet in circumference around any utility pole or utility wire.
- Removal of Cal Fire's identification of highly flammable vegetation greater than 3 inches high with a minimum clearance of 10 feet circumference around any utility pole or utility wire. This would include species such as Juniper, Italian Cypress, Monterey Pine, Chaparral, Scotch Broom, Bamboo and other fire-prone identified vegetation species.
- Inspections and remedial work must be completed every five years.
- Inspection and remedial work will be audited at least every six years.
- Fines will be determined with attention paid to being in good faith compliance with these rules for vegetation management.

RISKS AND RISK DRIVERS

- The Hayward Fault line runs through the middle of Berkeley, elevating fire risk from thrown sparks, fallen utility poles and broken gas lines.
- Many pines, oaks and eucalyptus have reached maturity and/or increasingly prone to disease and infestation, all of which adds to the already significant risk of crown fire behavior.
- We can no longer count on summer fog to replenish soil and vegetation humidity during our now extended dry season.
- Utility poles are aged and made of flammable natural wood, now carry heavy loads of wires and equipment, and could have a disastrous effect on evacuation and firefighting attempts if poles are knocked down by high winds, or by fallen trees.
- Water pressure and water access in the eastern most portion of our city is also of grave concern as inadequate water availability could have a similar disastrous effect on our firefighting capabilities as experienced in the 1991 Oakland Hills fire.
- Infrastructure in the residential areas of the High Fire Hazard zones of the Berkeley Hills were built for a previous era. Evacuation and first responder access is very challenging in that there are few sidewalks and almost no direct roadways running East to West or North to South.
- Cell phone reception is spotty, especially in the hilly areas of east Berkeley.. A recent survey reported that nearly 40% of the population in the United States rely solely on mobile phone services. Given the size of our university population, we would expect an even larger percentage of our population only uses cell phones. Emergency notifications via cell phones cannot be the only means to contact the public.

MITIGATION STRATEGY

- Any mitigation strategy must be shared by both the electric utilities and by the communications service providers.
- Replace live wire with heavily insulated tree wire, first in and around communities identified as extreme or very high hazard fire zones.

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- Replace utility poles with fire hardened poles constructed of non-flammable materials, especially along evacuation routes and in areas identified as extreme or very high hazard fire zones.
- Boost monthly ratepayer contributions earmarked for undergrounding utility projects.
- Extend the availability of Rule 20D funds to all communities with designated extreme or very high hazard fire zones.
- Prioritize Rule 20A undergrounding funds for municipal designated evacuation routes that may or may not also be arterials or collector streets.
- Require utility and communication service companies complete utility undergrounding projects within six years of formed utility undergrounding districts. This may entail extensive use of contract construction services with utility and communication service companies acting as project managers.
- Many communities, including Berkeley, lost nearly half of its annual Rule 20A earmarked undergrounding funds in 2000. This has had a dramatically negative impact on our city's ability to underground utilities on streets that could serve as safe and effective evacuation routes. At a minimum, pre- 2000 allocations should be restored for all communities.
- Communities identified as extreme or very high fire risks, should have additional allocated funds to be used for undergrounding local designated evacuation routes.
- A marketplace mechanism should be created for trading unused 20A funds to communities that will hugely benefit from freeing up these funds to underground utilities on local streets for the purpose of mitigating the elevated risk of loss of life and overall community wellbeing because of the exposure to wildfire threatening their communities.

HIGHER WILDFIRE THREAT

- The eastern border of the City of Berkeley is shared with the western border of Tilden Park which is prized for its steep valleys and dense timber stands. This adjacency to the park coupled with increasing episodic droughts, rising temperatures and loss of soil humidity from diminishing fog are significant factors in elevating fire risk. This is especially worrisome for our community because of our high urban density throughout our city. Nearly one third of our city is designated as either in the Extreme High Hazard Fire Zone or the Very High Hazard Fire Zone. We have every reason to believe these zones will be enlarged when the new Cal Fire maps are completed, hopefully in 2019.

ELECTRIC SERVICE FOR VULNERABLE POPULATIONS DURING PLANNED POWER OUTAGES EXCEEDING 12 HOURS

- If and when the decision is made to shut off power and upon request by local authorities, provide communities with targeted mobile power generation to address the likely needs of vulnerable populations. Delivery of mobile power generation would be at locally designated community service locations and be sufficient to run air purifiers, air cooling or heating systems, refrigeration and lighting.

It is our hope that you and the CPUC will consider our recommendations and comments.

Most Sincerely,

Susan Wengraf Jesse Arreguin

Berkeley Vice Mayor Susan Wengraf & Berkeley Mayor Jesse Arreguin

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