

4.20 Wildfire

This section of the PEA describes the wildfire-related attributes along the IC Project Alignment, as well as an assessment of impacts that have the potential to occur during construction and operation of the IC Project and its Alternatives.

4.20.1 Environmental Setting

4.20.1.1 Emergency Response Plans and Emergency Evacuation Plans

Section 4.9, Hazards and Hazardous Materials, addresses emergency response plans and evacuation plans. That Section also addresses fire hazard severity zones and fire response responsibility areas.

4.20.1.2 Flooding, Runoff, and Drainage

Section 4.10, Hydrology and Water Quality, addresses topics related to flooding, runoff, and drainage.

4.20.1.3 Vegetation

Vegetation types and habitats across the IC Project area are addressed in Section 4.4, Biological Resources.

4.20.1.4 Landslides and Slope Instability

Section 4.7, Geology and Soils, addresses topics related to landslides and slope instability. Section 4.4.2.1 addresses the topography of the IC Project area.

4.20.1.5 Wildfire History

SCE completed a query of its databases to determine whether any large fires occurred along Segments 1, 2, 3N, 3S, or 4 of the IC Project within the past ten years. SCE identified that one weather-related fire occurred along Segment 1 in March 2011. SCE identified no other fires along any of the remaining Segments of the IC Project.

4.20.2 Regulatory Setting

4.20.2.1 Federal

Please see Sections 4.9.2 and 4.10.2.

4.20.2.2 State

Senate Bill 901, enacted in 2018, adopted new provisions of Public Utilities Code Section 8386 requiring all electric utilities to prepare, submit and implement annual wildfire mitigation plans that describe the utilities' plans to construct, operate and maintain their electrical lines and equipment in a manner that will help minimize the risk of catastrophic wildfires associated with those electrical lines and equipment.

4.20.2.3 Local

Please see Sections 4.9.2 and 4.10.2.

4.20.3 Significance Criteria

The significance criteria for assessing the impacts to public services are derived from the California Environmental Quality Act (CEQA) Environmental Checklist. According to the CEQA Checklist, a project would cause a potentially significant impact if, located in or near state responsibility areas or lands classified as very high fire hazard severity zones, the Project would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan?
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

4.20.4 Impact Analysis

4.20.4.1 Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

4.20.4.1.1 Construction

Less than Significant Impact. As discussed in Section 4.17, the IC Project would not be expected to significantly impact traffic circulation or increase demands on existing emergency response services during temporary construction activities, and would not significantly impact emergency access in the area or increase the demand for existing emergency response services. Although it is not anticipated that construction activities would result in the blockage of any roadways that could be used in the case of an emergency, in the event that any construction-related activity may result in such a blockage or closure, SCE would implement APM TRA-1, which calls for coordination with local authorities including emergency responders regarding appropriate procedures. As directed in APM TRA-1, construction activities completed within public street rights-of-way would require the use of a traffic control service, and all lane closures would be conducted in accordance with APM TRA-1. Therefore, the impacts associated with construction activities would be less than significant under this criterion.

4.20.4.1.2 Operations

No Impact. As presented in Chapter 3, SCE is currently performing operation and maintenance (O&M) activities, including inspections, along the subtransmission lines that would be rebuilt and reconducted under the IC Project. No material changes in O&M activities or the locations of these activities are anticipated with implementation of the IC Project, and therefore no impacts would be realized under this criterion during operations and maintenance.

4.20.4.2 Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

4.20.4.2.1 Construction

No Impact. No components of the IC Project are designed for human occupancy, therefore no impacts would occur under this criterion.

4.20.4.2.2 Operations

No Impact. No components of the IC Project are designed for human occupancy, therefore no impacts would occur under this criterion.

4.20.4.3 Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

4.20.4.3.1 Construction

No Impact. The IC Project does not include or require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, non-Project power lines, or other utilities); the entirety of the IC Project is described in Chapter 3. Therefore, because no such associated infrastructure would be installed under the IC Project, the Project would not have any impacts under this criterion.

Further, as described in Section 4.9.4.7, the IC Project would not present a significant risk of loss, injury or death by exposing people or structures, either directly or indirectly, to wildland fires. As previously discussed, the majority of the IC Project Alignment is located within the CAL FIRE moderate fire hazard severity zone. The majority of the remainder of the IC Project Alignment is located within the CAL FIRE high and very high fire hazard severity zones; some portions of the IC Project Alignment are located in areas designated as non-wildland/non-urban land. Portions of Segment 1 are located in a CPUC-designated Fire Threat Area Tier 2 - Elevated. Segments 2, 3N, 3S, and 4 are not located in a CPUC-designated Fire Threat Area.

High heat or sparks from vehicles or equipment have the potential to ignite dry vegetation and cause fires. In addition, refueling activities and the welding and cutting of materials also have the potential to ignite dry vegetation and cause fires. However, IC Project activities would generally be located within existing SCE owned and/or to-be acquired ROWs where vegetation would be cleared or trimmed. Vehicles and equipment would primarily use existing roads, and would also use a drive and crush method in temporary construction areas where and when such a method can be used safely. In addition, SCE would implement standard fire prevention protocols during construction activities and comply with applicable laws and regulations. SCE would also develop and implement a Fire Prevention and Emergency Response Plan per APM HAZ-3.

In the event that the National Weather Service issues a Red Flag Warning during construction of the IC Project, additional measures would be implemented to address smoking and fire rules, storage and parking areas, the use of gasoline-powered tools, the use of spark arresters on construction equipment, road closures, the use of a fire guard, fire suppression tools, fire suppression equipment, and training requirements. Construction areas would be grubbed/trimmed of vegetation and graded before the staging of equipment, and in such areas where overland travel may occur, dry vegetation would also be trimmed; such activities would minimize the potential for vehicles or equipment to start a fire. As a result of these measures, construction of the IC Project would have a less than significant impact to the risk of loss, injury, or death involving wildland fires.

Within California, SCE participates with CAL FIRE, the California Governor's OES, and various city and county fire agencies in the Red Flag Fire Prevention Program, and complies with California PRC Sections 4292 and 4293 related to vegetation management in subtransmission line corridors. The portions of the IC Project located within moderate or high fire hazard severity zones and within CPUC-designated Tier 2-Elevated areas would generally be cleared of vegetation and graded prior to the staging of equipment, minimizing the risk of construction vehicles starting a fire.

4.20.4.3.2 Operations

No Impact. No material changes in O&M activities or the locations of these activities are anticipated with implementation of the IC Project. As presented in Chapter 3, SCE is currently performing operation and maintenance (O&M) activities, including inspections, along the IC Project subtransmission lines. As currently performed, SCE would continue to implement its standard fire prevention protocols during O&M activities; comply with applicable laws and regulations; implement additional measures in the event of a Red Flag Warning during construction; and participate with CAL FIRE and other city and county fire agencies in the Red Flag Fire Prevention Program (in compliance with PRC Section 4292 and 4293 relating to vegetation management in subtransmission line corridors).

Among the O&M activities that would continue after construction of the IC Project would be on-going implementation of SCE’s 2019 Wildfire Mitigation Plan in Segment 1, which is located in an area designated by the CPUC as Fire Threat Area Tier 2–Elevated. The Plan describes strategies, programs and activities that are in place, being implemented or are under development by SCE to proactively address and mitigate the threat of electrical infrastructure-associated ignitions that could lead to wildfires. Therefore, no impacts would be realized under this criterion during operations and maintenance.

4.20.4.4 Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

4.20.4.4.1 Construction

Less than Significant Impact. As discussed in the Hydrology and Water Quality impact analyses in Section 4.10.4, the IC Project SWPPP would include measures to control stormwater runoff rates which would minimize the potential for significant alteration of drainage patterns that would result in downslope or downstream flooding. Further, improvements to existing access roads and spur roads and construction of new spur roads would include design considerations to maintain or improve drainage patterns within the IC Project alignment. Therefore, through drainage design and SWPPP implementation, the IC Project would not substantially alter the existing drainage pattern of the site or area, or increase the rate or amount of surface runoff in a manner which would result in downstream or downslope flooding.

As discussed in the Geology and Soils impact analyses in Section 4.7.4 and displayed on Figureset 4.7-7, much of the IC Project is located in valley areas that would not be susceptible to post-fire slope instability. Localized areas of relatively steep slopes and increased landslide hazards occur where the components of the IC Project runs along the edges of hills and mountains. These localized areas may be susceptible to post-fire slope instability. However, these areas are generally indicated to have a moderate fire hazard severity rating, indicating that the vegetation in the area is less susceptible to fire or is sparser than in other areas, or that few structures susceptible to fire (and thus inhabitants) are present. Given this, impacts from post-fire slope instability would be less than significant.

4.20.4.4.2 Operations

No Impacts. As presented in Chapter 3, SCE is currently performing operation and maintenance (O&M) activities, including inspections, along the subtransmission lines that would be rebuilt and reconducted under the IC Project. No material changes in O&M activities or the locations of these activities are anticipated with implementation of the IC Project, and therefore no impacts would be realized under this criterion during operations and maintenance.

4.20.5 Applicant Proposed Measures

Because no potentially significant impacts would occur as a result of the IC Project, no avoidance or minimization measures are proposed.

4.20.6 Alternatives

Alternatives to the IC Project are addressed in Section 5.2, Description of Project Alternatives and Impact Analysis.

4.20.7 References

City of Barstow. 2015. Emergency Operations Plan. Available at

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Inyo County and City of Bishop (ICCB). 2016. Multi-Jurisdictional Hazard Mitigation Plan. Public Draft. Available at

http://www.inyoplanning.org/documents/InyoCountyMJHMPPublicDraft_Public_2016.07.26.pdf

Kern County Fire Department. 2012. Multi Jurisdiction Hazard Mitigation Plan Comprehensive Update 2012. Available online at <http://www.kerncountyfire.org/operations/divisions/office-of-emergency-services/emergency-plans/hazard-mitigation-plan.html>

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