

### 3.20 Wildfire

This section presents the wildfire risk environmental setting and impact analysis for the Proposed Project. This section includes existing wildfire conditions in the Proposed Project area, applicable regulations, environmental impacts, and mitigation measures required to reduce or avoid significant effects.

#### 3.20.1 Environmental Setting

Wildfires (or wildland fires) are unplanned and uncontrolled fires that occur in natural areas. Wildfires can occur from natural phenomenon (e.g., lightning); however, most wildfires are caused by human activities. Wildfires can be beneficial to ecosystems, but large, severe wildfires pose a threat to people, property, and the environment. The susceptibility of an area to wildfires is dependent on three factors—topography, fuel loads, and weather conditions—that contribute to the intensity, rate of spread, and severity of wildfires. Topographical features can exacerbate wildfire conditions as wildfire spread accelerates upslope. Fuel load is the amount of live or dead vegetation that is consumed during a wildfire. Of the three factors that affect wildfire risk as weather conditions influence (i.e., temperature, humidity, fuel moisture, and wind direction, wind is one of the most important factors for wildfire because it can bring a fresh supply of oxygen to the fire and push the fire toward a new fuel source (Holsinger, Parks, & Miller, 2016). The temperature of fuels is determined by the ambient temperature because fuels attain their heat by absorbing surrounding solar radiation. In general, fuels will ignite more readily at high temperatures than at low temperatures. Humidity, which is the amount of water vapor in the air, affects the moisture level of a fuel. At low humidity levels, fuels become dry and, therefore, catch fire more easily and burn more quickly than when humidity levels are high. Lastly, topographical features such as elevation, slope (the steepness of the land), aspect (the direction a slope faces), or other land features can promote or hinder the spread of fire. Elevation and aspect can determine how hot and dry a given area will be. For example, higher elevations will be drier but colder than low ones, and a north-facing slope will be slower to heat up or dry out. Slope can determine how quickly a fire will move through hills in a landscape. For example, if a fire ignites at the bottom of a steep slope, it will spread up the slope much more quickly than down because it can pre-heat the upslope fuels with rising hot air, and upward drafts are more likely to create spot fires (National Park Service, 2017)

Information on wildfire was obtained through a review of literature, maps, *geographic information system* (GIS) data, and online sources published by the California Department of Forestry and Fire Protection (CAL FIRE, United States Department of Agriculture's Forest Service (USDA Forest Service), and CPUC.

#### Vegetation (Fuels)

For the purpose of predicting the behavior and effects of wildfire using fire behavior fuel model (FBFMs), fuels are classified into four groups: grasses, brush (or shrubs), timber litter, and slash (Anderson 1982). The area of the Proposed Project alignment is primarily dominated by grasses

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or a mixture of grasses and shrubs. The modeled spread rate and flame length along the Proposed Project alignment vary greatly depending on the fuel type composition and fuel loads.

#### **Topography**

The topography along the Proposed Project alignment is generally flat at an elevation of approximately 1,000 feet *above mean sea level* (msl). The elevation increases where the alignment traverses more mountainous areas toward the Gorman and Banducci substations. The Proposed Project alignment reaches an elevation of approximately 3,600 feet amsl towards the Gorman substation and an elevation of 3,800 feet amsl towards the Banducci substation.

#### **Winds**

The Proposed Project alignment is located within the San Joaquin Valley Air Basin (SJVAB), Mojave Desert Air Basin (MDAB), and South Coast Air Basin (SCAB). The MDAB and SJVAB basins are separated by the Tehachapi Mountains to the east; the SJVAB and SCAB basins are separated by the San Gabriel Mountains to the south. During the summer, the wind generally flows in a south-southeasterly direction through the San Joaquin Valley. In the winter, the winds flow in a north-northwesterly direction. High winds may occur in the spring and summer seasons that could result in erosion (i.e., windblown dust) and increase the potential for wildfire risk (SJVUAPCD, 2003).

The 40 Scott and Burgan Fire Behavior Fuel Model (FBFM40) predicts spread rate and flame length for based on fuel composition, fuel loads along with other factors including humidity and conditions following different treatment scenarios. Figure 3.20-1 shows the FBFM40 assigned within the area along the Proposed Project alignment.

#### **High Fire Threat Districts**

In response to the CPUC's Fire Safety Rulemaking, the CPUC mapped high fire threat areas where more stringent requirements would be implemented due to the elevated risk for power line fires (CPUC n.d.). The CPUC High Fire Threat District (HFTD) maps to identify zones of utility-associated wildfire risk throughout the state. The HFTD maps consist of three fire-threat layers:

- Tier 1: High hazard zones on the USDA Forest Service/CAL FIRE joint map of tree mortality high hazard zones
- Tier 2: Elevated fire risk (including likelihood and potential impacts on people and property) from utility-associated wildfires
- Tier 3: Extreme fire risk (including likelihood and potential impacts on people and property) from utility-associated wildfires.

The HFTDs designate areas where fire-safety regulations apply. These fire-safety regulations include expanding vegetation clearance around power lines and requiring investor-owned utilities in southern California to prepare a plan to reduce the risk of fire ignitions by overhead facilities in high fire-threat areas during extreme fire weather events (CPUC, 2023).

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Figure 3.20-2 shows the fire hazard severity zones (FHSZ) within the project alignment. The northern portion of Segment 1, the southern portion of Segment 2, and the entire length of Segment 3 is located within a Tier 2 HTFD. The western portion of Segment 4 is located in a Tier 2 HTFD and the eastern third of Segment 4 is located within a Tier 3 HTFD. The entirety of Segment 5 is located in a Tier 3 HTFD.

#### Historic Fire Occurrence

Fire history can provide information on fire frequency, ignition sources, and areas susceptible to wildfires. Ten fires have occurred along the Proposed Project alignment from 2010 to the present (CalFIRE, 2013; CalFIRE, 2023). Details of those fires and their ignition sources are presented in Table 3.20-1. The largest fires that occurred along the alignment were the Comanche and the Breckenridge Complex. The Breckenridge Complex fire occurred along the northern portion of Segment 1 in the SNF, and the Comanche fire occurred along Segments 2 and 4 of the Proposed Project alignment.

**Table 3.20-1 Wildfire Occurrences Along the Proposed Project Alignment**

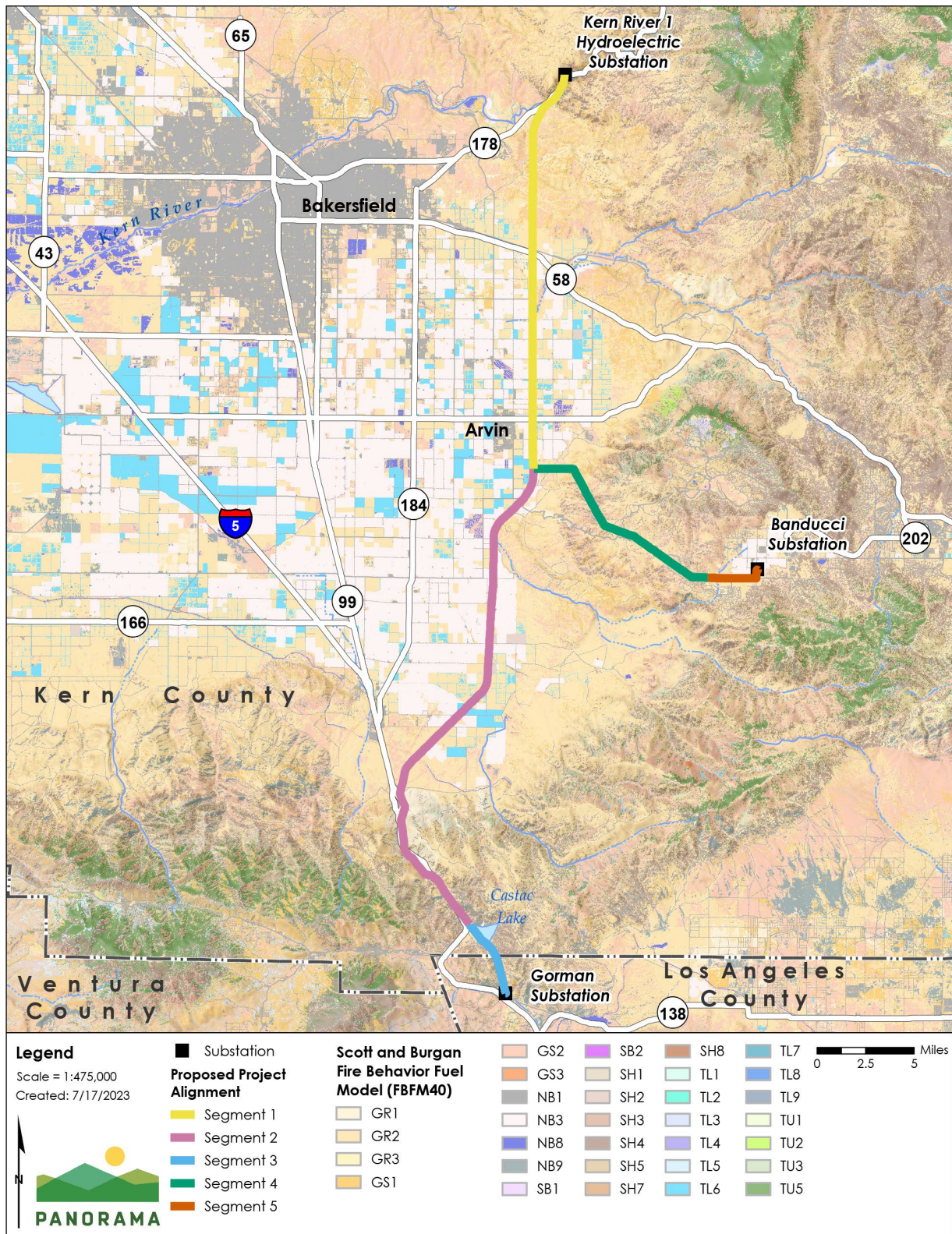
Wildfire name	Year	Location	Ignition source/location	No. acres burned
Base	2010	Kern County	Equipment use/unknown	150
Breckenridge Complex	2011	Kern County	Lightning/unknown	25,230
Comanche	2011	Kern county	Lightning/unknown	25,939
Rancho	2013	Kern County	Smoking/unknown	712
Water	2013	Kern County	Unknown/unknown	613
Gorman	2016	Los Angeles County	Unknown/unknown	5
Gorman	2017	Los Angeles County	Unknown/unknown	150
Switch	2017	Kern County	Unknown/unknown	10
Tejon	2017	Kern County	Unknown/unknown	8
Towerline	2017	Kern County	Unknown/unknown	2
Crane	2021	Kern County	Unknown/unknown	47
Canyon	2021	Kern County	Unknown/unknown	217
Shell	2021	Kern County	Unknown/unknown	1,828

(CalFIRE, 2013)



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**Figure 3.20-1 40 Scott and Burgan Fire Behavior Fuel Model**

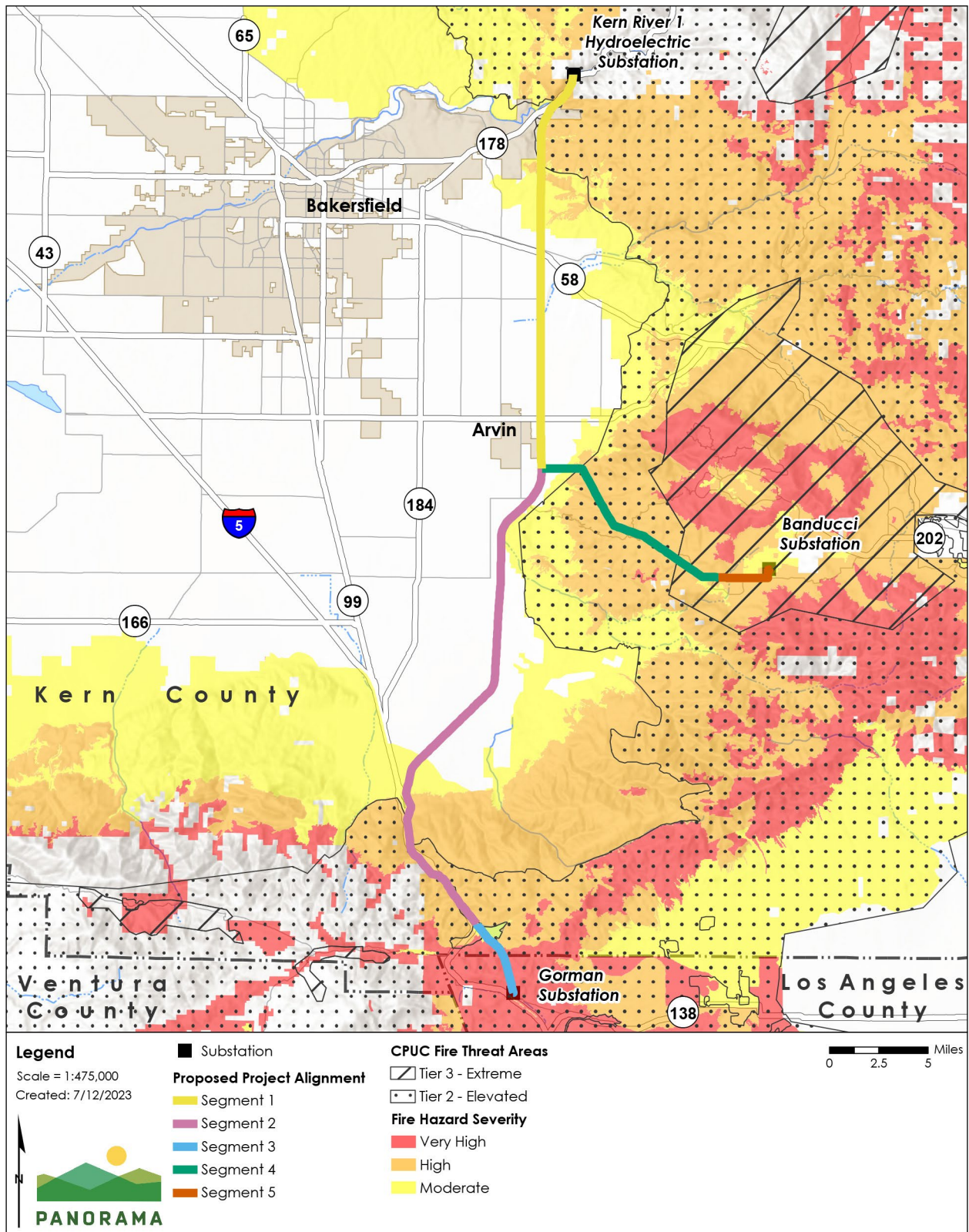


Source: (EROS, U.S. Geological Survey 2023)



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**Figure 3.20-2 Fire Hazard Severity Zones and CPUC Fire Threat Areas**



Source: (CAL FIRE 2023; CPUC 2021)

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### **Wildland Urban Interface**

A Wildland Urban Interface (WUI) is defined an area where homes and structures are located in close proximity to or along the boundary of wildlands. Communities in the WUI are at greater risk for loss of life and property. Approximately 22 percent of the Proposed Project alignment is located within the WUI. The northern portion of Segment 1 and southern portion of Segment 2 are located within the WUI. The entirety of Segment 3 is located in the WUI. The eastern section of Segment 4 and most of Segment 5 are also located in the WUI. WUI designations in the project area are shown in Figure 3.20-3.

### **Emergency Response and Evacuation**

The California Governor's Office of Emergency Services (Cal OES) is responsible for overseeing and coordinating emergency preparedness, response, recovery and homeland security activities within the State of California. Cal OES established a Standard Emergency Management System (SEMS) to harmonize incident command, mutual aid agreements, roles, responsibilities, and training. Kern County and Los Angeles County each have developed and implemented emergency response plans.

There are several designated evacuation routes that are crossed by the Proposed Project along Segment 1. These evacuation routes include SR 178, Edison Highway, SR 58, East Panama Lane, Panama Road, Buena Vista Road, and SR 223 (SCE, 2022; Robert Olson Associates, 2009). The Proposed Project alignment also crosses Interstate 5, which is identified by Los Angeles County as a disaster route (Los Angeles County, n.d.). The following public roadways crossed by the Proposed Project alignment lack a secondary point of access or exit: Badger Court, Quail Drive, Jacks Hill Road, Elkhorn Place, Longhorn Lane, Angus Court along Segment 4, and Birkdale Court in Segment 5.

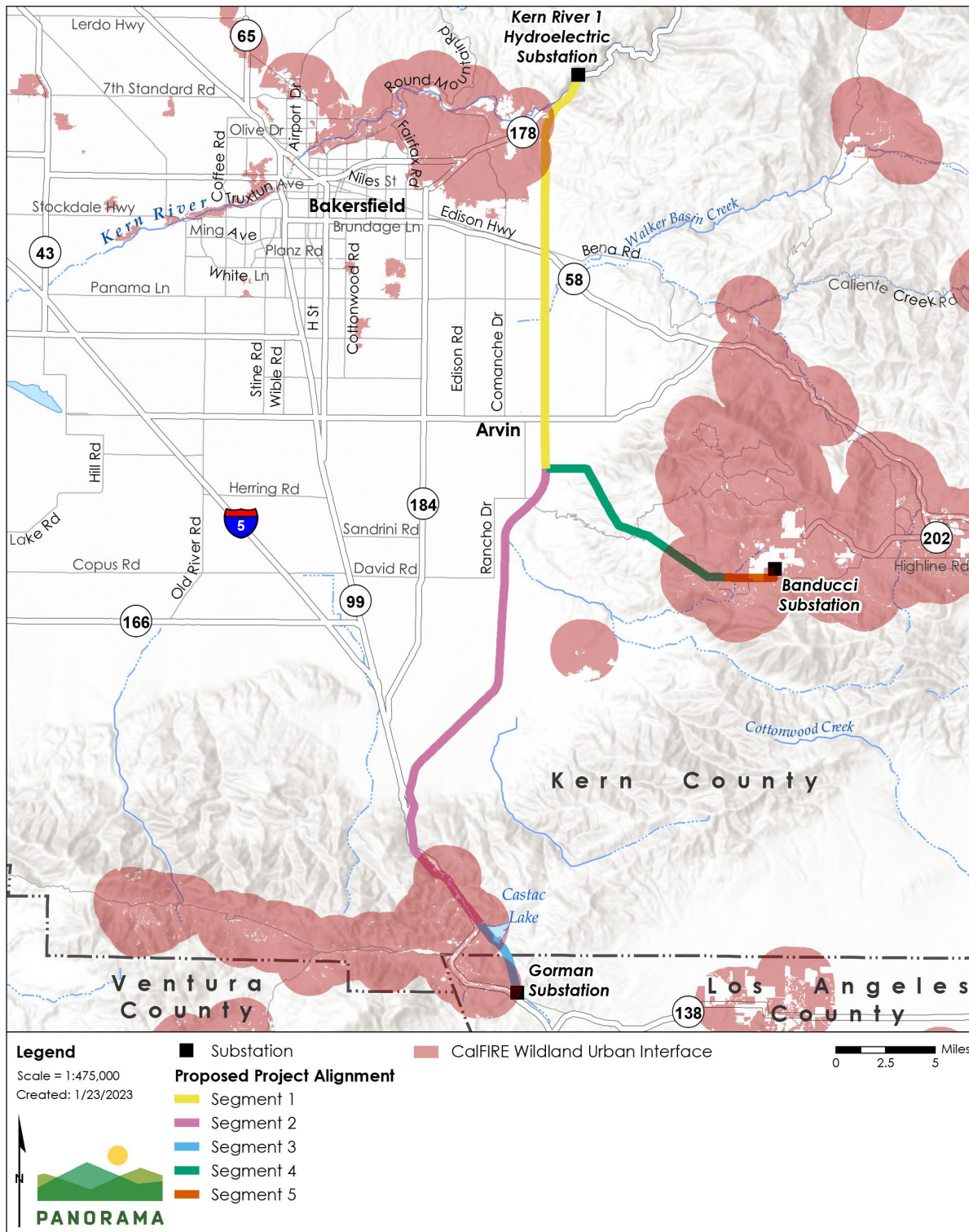
### **Environmental Setting by Segment**

The wildfire risk for the Proposed Project area and planned evacuation routes are summarized by segment in Table 3.20-2.



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**Figure 3.20-3 Wildland Urban Interface Areas**



Source: (FRAP 2015)

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**Table 3.20-2 Environmental Setting by Segment**

Segment	CAL FIRE FHSZ	CAL FIRE Responsibility Area <sup>a</sup>	CPUC Fire Threat District	WUI area	Planned emergency evacuation routes
Segment 1	Moderate or high (northern portion) Unzoned (southern portion)	FRA <sup>b</sup> SRA <sup>c</sup> LRA <sup>d</sup>	Tier 2 (northern portion)	The northern portion along the boundary of the City of Bakersfield	SR 178 SR 58 SR 223 East Panama Lane Panama Road Buena Vista Road
Segment 2	Moderate or high (northern and southern portion) Unzoned (central portion)	FRA SRA LRA	Tier 2 (southern portion)	Southern portion of the segment	None
Segment 3	Moderate or high (northern and central portion) Very high (southern portion)	SRA	Tier 2 (entire segment)	Majority of the segment	None
Segment 4	Moderate or high (entire segment)	SRA LRA	Tier 2 (western portion) Tier 3 (eastern portion)	Eastern portion near the city of Tehachapi and Stallion Springs CSD	None
Segment 5	Moderate or high (entire segment)	SRA LRA	Tier 3 (entire segment)	Majority of the segment	None

**Notes:**

- a. FRA: federal responsibility area; SRA: state responsibility area; LRA: local responsibility area
- b. Federal Responsibility Area (FRA) are areas where federal agencies have jurisdiction over fire prevention and suppression.
- c. State Responsibility Areas (SRA) are areas where CalFIRE is the primary emergency response agency for fire prevention.
- d. Local Responsibility Area (LRA) are areas where the local agency, city, county, or district is responsible for fire prevention and suppression.

*Source: (FRAP 2015; 2023; CPUC 2021; CAL FIRE 2017 (Robert Olson Associates, 2009))*



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### 3.20.2 Applicable Regulations, Policies and Standards

Federal, State, and local regulations were reviewed for applicability to the Proposed Project.

#### Federal Regulations, Policies and Standards

##### National Electric Safety Code and American National Standards Institute Guidelines

A variety of line and tower clearance standards are used throughout the electric transmission industry. Nationally, most transmission line owners follow the National Electric Safety Code rules or American National Standards Institute guidelines, or both, when managing vegetation around transmission system equipment. The National Electric Safety Code governs electric safety rules, including transmission wire clearance standards, whereas the applicable American National Standards Institute code governs the practice of pruning and removal of vegetation.

#### State Regulations, Policies and Standards

##### California State Hazard Mitigation Plan

The Cal OES 2018 California State Hazard Mitigation Plan (SHMP) represents the State's primary hazard mitigation guidance document. The 2018 SHMP continues to build upon the State's commitment to reduce or eliminate potential risks and impacts of natural and human-caused disasters to help communities with their mitigation and disaster resiliency efforts. The 2018 plan includes the following: an updated statewide risk assessment, disaster history, and statistics; recent mitigation progress, success stories, and best practices; updated State hazard mitigation goals, objectives, and strategies; and updated climate mitigation progress and adaptation strategies. The Federal Emergency Management Agency (FEMA) approved California's 2018 SHMP on September 28, 2018. The SHMP identifies and profiles wildfire hazards throughout the state and includes a comprehensive statewide fire hazards risk assessment. The SHMP emphasizes that preparation and implementation of local hazard mitigation plans with linkage to a jurisdiction's general plan play an important role in the fire mitigation process (Cal OES, 2018).

##### California Department of Forestry and Fire Protection

Pursuant to Public Resources Code (PRC) sections 4201 to 4204 and California Government Code (CGC) sections 51175 to 51189, CAL FIRE has created statewide FHSZ maps that identify areas of state and local responsibility for preventing or suppressing fires. Within state responsibility areas (SRAs), the director of Cal Fire has designated areas as moderate, high, or very high FHSZ (PRC § 4202). Outside of SRAs and within local responsibility areas (LRAs), the director of Cal Fire is charged with recommending areas to be designated as very high FHSZ (CGC § 51178). These recommendations are to be reviewed and adopted in ordinances by local agencies (CGC § 51179); however, not all local agencies have complied. Responsibility area designations are available as a GIS data set the State Geoportal (California Department of Technology n.d.) or through FRAMP's FHSZ viewer (FRAP n.d.).

##### California Public Utilities Commission General Order 95

CPUC's GO 95 is the key standard governing the design, construction, operation, and maintenance of overhead electric lines in the State. GO 95 Rule 35 governs tree trimming

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requirements, including minimum vegetation clearances around power lines in extreme and very high fire threat zones in Southern California. The rule requires radial clearances to be 120 inches from vegetation for bare line conductors in extreme and very high fire threat zones in southern California. GO 95 Rule 31.2 requires that lines be inspected frequently and thoroughly to ensure that they are in good condition, and that lines temporarily out of service be inspected and maintained in such condition so as not to create a hazard.

#### **California Public Utilities Commission General Order 166**

The purpose of the standards contained in GO 166 is to ensure that jurisdictional electric utilities are prepared for emergencies and disasters in order to minimize damage and inconvenience to the public which may occur as a result of electric system failures, major outages, or hazards posed by damage to electric distribution facilities. The standards require, among others, that each jurisdictional electric utility prepare an emergency response plan and update the plan annually; conduct annual emergency training and exercises using the utilities emergency response plan; and coordinate emergency plans with State and local public safety agencies.

#### **California Public Resources Code Sections 4292 and 4293**

PRC section 4292 requires a 10-foot area of clearance of any tree branches or ground vegetation around the base of power poles carrying more than 110 kV. The firebreak clearances required by PRC section 4292 are applicable within an imaginary cylindrical space surrounding each pole or tower on which a switch, fuse, transformer or lightning arrester is attached and surrounding each dead end or corner pole. PRC section 4293 dictates guidelines for line clearance, including a minimum of 10 feet of vegetation clearance around any conductor operating at 110 kV or higher.

#### **California Health and Safety Code Section 13009**

Health and Safety Code Section 13009 permits CAL FIRE to file civil actions to recover fire suppression costs from a party who causes a fire (1) negligently or (2) in violation of a law or an order to correct a fire hazard. CAL FIRE established the Civil Cost Recovery Program to satisfy the statute's intent to assign financial responsibility to culpable parties and to prevent fires through deterrence.

#### **Senate Bill 901**

Signed into law in September 2018, SB 901, among other things, amends the Public Utilities Code to require utilities to prepare wildfire mitigation measures if the utilities' overhead electrical lines and equipment are located in an area that has a significant risk of wildfire resulting from those electrical lines and equipment. The bill requires the wildfire mitigation measures to incorporate specified information and procedures and utilities to prepare a wildfire mitigation plan.

SCE submits its wildfire mitigation plan to the CPUC annually in compliance with SB 901. The wildfire mitigation 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, further harden the

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electric system against wildfires, and enhance wildfire suppression efforts. The latest Wildfire Mitigation Plan (2023–2025) emphasizes the need to reduce Public Safety Power Shutoff impacts and wildfire risk associated with utilities.

### **Fire Prevention Standards for Electric Utilities**

The Fire Prevention Standards for Electric Utilities (CCR Title 14, §§ 1250–1258) mandate definitions, maps, specifications, and clearance standards for applying the requirements of PRC sections 4292 to 4296 to projects in SRAs under the jurisdiction of CAL FIRE.

### **California Fire Code**

The California Fire Code 2016 (CCR Title 24, part 9) is based on the International Fire Code from the International Code Council and contains consensus standards related to establishing good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new or existing buildings, structures, and premises.

### **Government Code Section 51175 to 51189**

Government Code sections 51175 to 51189 direct Cal Fire to identify areas of very high fire hazard severity zones (VHFHSZ) within LRAs. Mapping of the areas is based on data and models of potential fuels over a 30-to-50-year time horizon along with their associated expected fire behavior and expected burn probabilities to quantify the likelihood and nature of vegetation fire exposure to buildings.

LRA VHFHSZ maps were initially developed in 1996 and are now being updated based on improved science, mapping techniques, and data. Local governments had 120 days from receiving the CAL FIRE recommendations to designate, by ordinance, very high fire hazard severity zones within their jurisdictions. Local governments were able to add additional VHFHSZs. There was no requirement for local government to report their final action to CAL FIRE once recommended zones are adopted. Consequently, users are directed to the appropriate local entity (county, city, fire department, or fire protection district) to determine the status of the local fire hazard severity zone ordinance.

### **Local Regulations, Policies and Standards**

The CPUC has sole and exclusive State jurisdiction over the siting and design of the Proposed Project because it authorizes the construction, operation, and maintenance of investor-owned public utility facilities. Pursuant to GO 131-D section XIV.B, “Local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the CPUC’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters.” Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the counties’ and cities’ regulations are not applicable as the counties and cities do not have jurisdiction over the Proposed Project. Accordingly, the following discussion of local land use laws, regulations, and policies is provided for informational purposes only.



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### **Kern County Multi-Jurisdiction Hazard Mitigation Plan**

Kern County and several participating jurisdictions prepared in 2020 a Comprehensive Update to the Multi-Jurisdiction Hazard Mitigation Plan (MHMP), originally approved by FEMA in 2006. The purpose of this plan is to guide hazard mitigation planning, including wildfire hazards, to better protect the people and property of the County from the effects of hazard events. The plan demonstrates the commitment of each participating jurisdiction to reducing risks from hazards and serves as a tool to help decision makers direct mitigation activities and resources.

### **Kern County Emergency Operations Plan**

Kern County Fire Department maintains and implements the Kern County EOP, which provides a framework for performing emergency functions in preparation for, during, and after an emergency event. The EOP complies with State and federal emergency management systems, including the Standardized Emergency Management System (SEMS) and the National Incident Management Systems (NIMS). The EOP comprises four sections: (1) Basic Plan; (2) General Procedures; (3) Emergency Operations Center Procedures and Annexes; and (4) Contingency Plans. The Fire, Rescue, and HazMat Branch of the Emergency Operations Center coordinates the activities of all personnel engaged in fire, rescue and hazardous materials response (County of Kern 2022).

### **Kern County Fire Department Unit Strategic Fire Plan**

The Kern County Fire Department Strategic Fire Plan documents the assessment of wildland fire risk and mitigation throughout the SRA within the county (Kern County Fire Department 2021). It includes stakeholder contributions and priorities and identifies strategic targets for pre-fire solutions as defined by the people who live and work with the local fire problem. The goal of the plan is to reduce costs and losses from wildfire by protecting assets at risk through focused pre-fire management prescriptions and increasing initial attack success (Kern County Fire Department, 2018).

### **Los Angeles All-Hazards Mitigation Plan**

The Los Angeles All-Hazards Mitigation Plan assesses risks from natural hazards and develops mitigation plans for reducing the risks. The plan meets the requirements of the Disaster Management Act and was developed using FEMA's Local Mitigation Plan Review Tool, which provides guidance for designing local hazard mitigation plans to meet Disaster Management Act regulations. The plan identifies wildfire risk for Los Angeles County and establishes mitigation strategies and actions that could be utilized to minimize wildfire risk (Los Angeles County, 2020).

### **Kern County General Plan**

The Kern County General Plan Safety Element guides public safety and wildland fire planning within Kern County (County of Kern 2009). The Safety Element contains goals, policies, and

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implementation measures relevant to the analysis of wildfire for the Proposed Project, including the following:

***Goals:***

- Minimize injuries and loss of life and reduce property damage.
- Assist in the allocation of public resources in Kern County to develop information regarding geologic, fire, and flood safety hazards and to develop a systematic approach toward the protection of public health, safety, and welfare from such hazards.
- Create an awareness of the residents in Kern County through the dissemination of information about geologic, fire, and flood safety hazards.
- Reduce the public's exposure to fire, explosion, blowout, and other hazards associated with the accidental release of crude oil, natural gas, and hydrogen sulfide gas.

***Policies:***

- The County shall encourage extra precautions be taken for the design of significant lifeline installations, such as highways, utilities, and petrochemical pipelines.
- The adopted Kern County, California Multi-Hazard Mitigation Plan is incorporated by reference. This multi-jurisdictional plan, approved in compliance with the Disaster Mitigation Act of 2000, provides long-term planning to reduce the impacts of future disasters.

***Implementation Measures:***

- All hazards (geologic, fire, and flood) should be considered whenever a Planning Commission or Board of Supervisor's action could involve the establishment of a land use activity susceptible to such hazards.
- The adopted multi-jurisdictional Kern County, California Multi-Hazard Mitigation Plan, as approved by FEMA, shall be used as a source document for preparation of environmental documents pursuant to CEQA, evaluation of project proposals, formulation of potential mitigation, and identification of specific actions that could, if implemented, mitigate impacts from future disasters and other threats to public safety.

**The Metropolitan Bakersfield General Plan**

The Metropolitan Bakersfield General Plan Safety Element guides public safety and wildland fire planning within the City of Bakersfield (City of Bakersfield 2022). The Safety Element contains the following goal, policy, and implementation measure relevant to the analysis of wildfire for the Proposed Project:

***Goal:***

- Develop sustainable communities to preserve life, protect property, the environment, and the economy from natural hazards.

***Policy:***

- The adopted Kern County, California Multi-Hazard Mitigation Plan is incorporated by reference. This multi-jurisdictional plan, approved in compliance

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with the Disaster Mitigation Act of 2000, provides long-term planning to reduce the impacts of future disasters.

### ***Implementation Measure:***

- The adopted multi-jurisdictional Kern County, California Multi-Hazard Mitigation Plan, as approved by FEMA, shall be used as a source document for preparation of environmental documents pursuant to CEQA, evaluation of project proposals, formulation of potential mitigation and identification of specific actions that could, if implemented, mitigate impacts from future disasters and other threats to public safety.

### **3.20.3 Applicant Proposed Measures**

SCE has proposed measures to reduce environmental impacts. The significance of the impact is first considered prior to application of APMs and a significance determination is made. The implementation of the APMs is then considered as part of the Proposed Project when determining whether impacts would be significant and thus would require mitigation. These APMs would be incorporated as part of any CPUC project approval, and SCE would be required to adhere to the APM as well as any identified mitigation measures. The APMs are included in the MMRP for the Proposed Project, and the implementation of the measures would be monitored and documented in the same manner as mitigation measures. The APMs that are applicable to the wildfire impact analysis are provided in Table 3.20-3.

### **CPUC Environmental Measures**

The CPUC has developed additional standard measures to reduce potential impacts from wildfires. The CPUC standard measures will be included in the MMRP for the Proposed Project and implemented during Proposed Project construction. The CPUC measure applicable for wildfire is listed below in .

**Table 3.20-3 Applicant Proposed Measures**

APM Number	Requirements
HAZ-3	<p><b>Prepare and Implement a Project-Specific Fire Management Plan.</b> A Fire Prevention and Emergency Response Plan will be developed to ensure the health and safety of construction workers, SCE personnel, and the public during Project construction. The Plan shall cover:</p> <ul style="list-style-type: none"><li>• The purpose and applicability of the plan</li><li>• Responsibilities and duties</li><li>• Project areas where the plan applies</li><li>• Procedures for incorporating Red Flag Warnings, Fire Potential Index (FPI), Project Activity Level (PAL), and equivalent indicators in determining fire weather related work restrictions</li><li>• Procedures for fire reporting, response, prevention, and evacuation routes</li><li>• Coordination procedures with federal and local fire officials</li><li>• Crew training, including fire safety practices and restrictions</li><li>• Fire suppression and communication equipment required to be on hand during construction</li><li>• Method for verification that Plan protocols and requirements are being followed</li><li>• Post-construction fire prevention and response measures</li></ul>



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APM Number	Requirements
	The Project-specific Fire Prevention and Emergency Response Plan for construction of the project will be prepared by SCE and submitted to CPUC, CalFIRE, Kern and Los Angeles counties, and local municipal fire agencies for review at least 30 days prior to initiation of construction. SCE will address all comments received from reviewing agencies and provide the final Fire Prevention and Emergency Response Plan to reviewing agencies for approval prior to initiating construction activities.
TRA-1	SCE will implement traffic control measures consistent with those published in the Manual on Uniform Traffic Control Devices, as written and amended by Caltrans for the State of California (CA MUTCD) and using standard templates from the California Temporary Traffic Control Handbook (CATTCH) (California Inter-Utility Coordinating Committee 2018). These measures will be implemented as and where necessary as described in the CA MUTCD and/or CATTCH, or in ministerial permits.
TRA-2	<ul style="list-style-type: none"> <li>• Prior to construction, SCE will consult with the FAA regarding helicopter flight plans that will take place during construction. This consultation will include, but not be limited to:</li> <li>• Providing locations of helicopter construction staging and work areas.</li> <li>• Establishing designated flight corridors between staging and work areas.</li> <li>• Means to ensure external load operations avoid occupied structures and roadways.</li> <li>• Locations of traffic control where external load operations will cross public roadways.</li> <li>• Locations where Congested Area Plans may be required for filing with the FAA.</li> <li>• Identifying any flight restrictions recommended/required by the FAA.</li> </ul> <p>The results of this coordination will be provided to the CPUC.</p>

**Table 3.20-4 CPUC Environmental Measures**

CPUC Draft Environmental Measure	Requirement
Construction Fire Prevention Plan	<p>A project-specific Construction Fire Prevention Plan for both construction and operation of the project shall be submitted for review prior to initiation of construction. A draft copy of the Plan shall be provided to the CPUC and state and local fire agencies at least 90 days before the start of any construction activities in areas designated as Very High or High Fire Hazard Severity Zones. Plan reviewers shall also include federal, state, or local agencies with jurisdiction over areas where the project is located. The final Plan shall be approved by the CPUC at least 30 days prior to the initiation of construction activities. The Plan shall be fully implemented throughout the construction period and include the following at a minimum:</p> <ul style="list-style-type: none"> <li>• The purpose and applicability of the Plan</li> <li>• Responsibilities and duties</li> <li>• Preparedness training and drills</li> <li>• Procedures for fire reporting, response, and prevention that include: <ul style="list-style-type: none"> <li>– Identification of daily site-specific risk conditions</li> <li>– The tools and equipment needed on vehicles to be on hand at sites</li> <li>– Reiteration of fire prevention and safety considerations during tailboard meetings.</li> </ul> </li> </ul>

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CPUC Draft Environmental Measure	Requirement
	<ul style="list-style-type: none"> <li>– Daily monitoring of the red-flag warning system with appropriate restrictions on types and levels of permissible activity.</li> <li>• Coordination procedures with federal and local fire officials.</li> <li>• Crew training, including fire safety practices and restrictions</li> <li>• Method(s) for verifying that all Plan protocols and requirements are being followed</li> </ul> <p>A project Fire Marshal or similar qualified position shall be established to enforce all provisions of the Construction Fire Prevention Plan as well as perform other duties related to fire detection, prevention, and suppression for the project. Construction activities shall be monitored to ensure implementation and effectiveness of the Plan.</p>
Fire Prevention Practices (Construction and Maintenance)	<p>The Applicant shall implement ongoing fire patrols during the fire season as defined each year by local, state, and federal fire agencies. These dates vary from year to year, generally occurring from late spring through dry winter periods. During Red Flag Warning events, as issued daily by the National Weather Service, all construction/maintenance activities shall cease, with an exception for transmission line testing, repairs, unfinished work, or other specific activities which may be allowed if the facility/equipment poses a greater fire risk if left in its current state.</p> <p>All construction/maintenance crews and inspectors shall be provided with radio and cellular telephone access that is operational in all work areas and access routes to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction/maintenance activities at each work site. All fires shall be reported to the fire agencies with jurisdiction in the area immediately upon discovery of the ignition.</p> <p>All construction/maintenance personnel shall be trained in fire-safe actions, initial attack firefighting, and fire reporting. All construction/maintenance personnel shall be trained and equipped to extinguish small fires in order to prevent them from growing into more serious threats. All construction/maintenance personnel shall carry at all times a laminated card and be provided a hard hat sticker that list pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on laminated contact cards and hard hat stickers shall be updated and redistributed to all construction/maintenance personnel and outdated cards and hard hat stickers shall be destroyed prior to the initiation of construction/maintenance activities on the day the information change goes into effect.</p> <p>Construction/maintenance personnel shall have fire suppression equipment on all construction vehicles. Construction/maintenance personnel shall be required to park vehicles away from dry vegetation. Water tanks and/or water trucks shall be sited or available at active project sites for fire protection during construction. The Applicant shall coordinate with applicable local fire departments prior to construction/maintenance activities to determine the appropriate amounts of fire equipment to be carried on vehicles and, should a fire occur, to coordinate fire suppression activities.</p>

### 3.20.4 Environmental Analysis

#### Approach to Impact Analysis

This impact analysis considers whether implementation of the Proposed Project would result in significant wildfire impacts. In assessing impacts during construction, consideration is given to

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existing conditions, including vegetation and existing transmission lines and equipment, and how those may be altered as a result of implementing the Proposed Project. Consideration is also given to the fire-safety related procedures and practices that would apply during construction. In assessing impacts during operations and maintenance, consideration is given to ongoing vegetation management and equipment maintenance and safety practices, procedures, and training.

#### Summary of Impacts

Table 3.20-5 presents a summary of the CEQA significance criteria and impacts related to wildfires that would occur during construction, operation, and maintenance of the Proposed Project.

**Table 3.20-5 Summary of Proposed Project Impacts to Wildfires**

Would the proposed project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Substantially impact an adopted emergency response plan or emergency evacuation plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Impact Discussion

##### a) Substantially impact an adopted emergency response plan or emergency evacuation plan

##### Construction

As discussed in 4.9: Hazards and Hazardous Materials and Section 4.17: Transportation and Traffic, the Proposed Project would not significantly impact traffic circulation or increase demands on existing emergency response services during construction activities. However, replacing and rebuilding the subtransmission lines may require temporary closure of travel lanes on roadways during structure or conductor installation. Guard structures would be installed at road crossings to generally maintain vehicle access on roadways along the alignment; however, there may be locations where temporary lane or road closure is necessary



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for worker and vehicle safety. Because the Proposed Project crosses roads and highways that are part of an emergency evacuation plan, temporary closure of a roadway or travel lane could impact an emergency evacuation plan. Construction would also involve the movement of oversized vehicles that could affect emergency vehicle access to and through construction areas, which has the potential to impact emergency response.

SCE has proposed implementation of APMs as part of the Proposed Project. Implementation of APM TRA-1 requires the implementation of traffic control measures consistent with those in the Manual on Uniform Traffic Control Devices. Traffic control measures would include coordinating with local authorities, including emergency responders, regarding temporary lane or road closures. Vehicle movements along, and use of, access roads would be communicated to and coordinated with the appropriate agencies as necessary. At construction work areas, equipment would be situated or attended to facilitate adequate emergency vehicle access. In the event of an emergency, construction would halt and access would be restored for emergency responders. Additionally, MM Traffic-3 requires SCE to notify local emergency personnel at least 1 week prior to lane or road closures. With implementation of APM TRA-1 and MM Traffic-5, construction of the Proposed Project would not interfere with emergency response or evacuation plans, and the impact would be less than significant.

#### **Operation and Maintenance**

Operation and maintenance activities for the Proposed Project would be similar to existing operation and maintenance performed at the existing subtransmission line and substations. Similar to existing facilities, operation and maintenance of the Proposed Project would generally not occur in roadways but may, under limited circumstances, require temporary lane closures to access to the alignment. No additional impact would occur as a result of the Proposed Project because the Proposed Project would not require increased frequency of temporary lane closures. There would be no impact on emergency response or evacuation plans from operation and maintenance of the Proposed Project.

**Required APMs and MMs:** APM TRA-1 and MM Traffic-3

#### **b) 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.**

As shown in Figure 3.20-2, portions of Segments 4 and all of Segment 5 are in CPUC Tier 3 (Extreme) HFTDs, and portion of Segments 1, 2, 3, and 4 are in Tier 2 (Elevated) HFTDs. As described above under Section 3.20.1, the primary factors that impact wildfire intensity and behavior include weather (e.g., wind, humidity), fuel conditions (e.g., vegetation type and age, accumulation of dead material), and topography (e.g., steep slopes). As discussed above, topography along the Proposed Project alignment is generally flat except for the mountainous areas near the Gorman and Banducci Substations. Hot, dry summer winds in the San Joaquin Valley could contribute to the uncontrolled spread of a wildfire as well as carry pollutant concentrations to communities to the southeast of the alignment.

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### **Construction**

Construction activities for replacement of subtransmission line structures would require use of heavy ignition equipment and hot work in areas with high and very high fire risk. Vehicle engine starting or idling in a vegetated area, workers smoking in a vegetated area, and hot work (e.g., welding) activities during construction could ignite a fire in the nearby vegetation. Construction activities in combination with hot, windy weather conditions could exacerbate wildfire risk.

SCE has proposed implementation of APMs as part of the Proposed Project. APM HAZ-3 requires development and implementation of a Fire Prevention and Emergency Response Plan. The Fire Prevention and Emergency Response Plan would require procedures for fire reporting, response, prevention, and evacuation. In addition, the plan would include crew training on fire safety practices and restrictions and would require fire suppression and communication equipment to be onsite during Project construction to avoid igniting a fire and suppress a fire if one started. In accordance with APM HAZ-3, the Project-specific Fire Prevention and Emergency Response Plan for construction of the Proposed Project would be submitted to CPUC, CAL FIRE, Kern and Los Angeles counties, and local municipal fire agencies for review prior to initiation of construction.

SCE would also implement standard fire prevention protocols during construction activities. Protocols during construction activities include vegetation clearing before equipment staging that would minimize the potential for construction equipment or vehicles from igniting a fire. In the event that the National Weather Service issues a Red Flag Warning during Project construction, 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 of the Proposed Project would not exacerbate wildfire risks with implementation of APM HAZ-3 and standard fire prevention protocols. The impact from exacerbated wildfire risk would be less than significant.

### **Operation and Maintenance**

The Proposed Project involves replacing and modifying existing electric transmission infrastructure and would not involve the placement of occupants where they may be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The Proposed Project would replace wood poles and H-frames with TSP or LWS poles. Replacing subtransmission line poles with nonflammable materials would reduce future wildfire risk along the alignment. The Proposed Project would increase system reliability by updating aging infrastructure with infrastructure that meets current safety standards, including line clearance standards, thereby reducing the potential for ignitions compared to existing conditions.

Once constructed, the Proposed Project would be operated remotely, and no personnel would be located permanently on site. SCE would continue to perform the same or similar

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maintenance activities for the Proposed Project as are currently performed along the existing subtransmission lines and substations. Maintenance would include asset management and inspections within these areas in accordance with SCE's 2023–2025 Wildfire Mitigation Plan (SCE, 2023). The Proposed Project would also be required to comply with California PRC sections 4292 and 4293, which require SCE to maintain clearance distances between vegetation and all conductors. The Proposed Project would also be required to fell, cut, or trim trees that are considered dead, diseased, or rotten and pose a hazard to the subtransmission line. Additionally, SCE is required to design electrical lines in accordance with safety requirements of the CPUC's GO 95 and other applicable requirements, including the implementation of vegetation management activities in order to establish minimum clearances between conductors and vegetation. In accordance with the CPUC Environmental Measures, the CPUC requires the preparation of a Fire Prevention Plan that addresses procedures for fire reporting, response, and prevention for construction and operation activities. Because the Proposed Project would reduce wildfire risk by replacing wooden infrastructure with metal infrastructure, and the Project would be operated in compliance with SCE's Wildfire Mitigation Plan, operation and maintenance of the Proposed Project would not exacerbate wildfire risks, and impacts would be less than significant.

#### Required APMs and MMs: APM HAZ-3

**c) 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.**

#### Construction

Most construction activities associated with the Proposed Project would occur within existing subtransmission line ROWs and easements that have been cleared of vegetation. Access to construction areas would rely primarily on existing paved roads and unpaved access roads. No fuel breaks or emergency water sources would be required.

As previously discussed, a majority of the Proposed Project alignment is located within CAL FIRE's moderate FHSZ. However, portions of the Proposed Project are within an undesignated or high FHSZ. The eastern portion of Segment 4 and the entirety of Segment 5 are located in CPUC-designated Fire Threat Area Tier 3 (Extreme) areas. The northern portion of Segment 1, the southern portion of Segment 2, the entirety of Segment 3, and the central portion of Segment 4 are located in CPUC-designated HFTD Tier 2 (Elevated) areas. No other portion of the Proposed Project is located in a CPUC-designated HFTD.

Construction of the Proposed Project in high FHSZs and HFTDs, may increase potential risk of fire ignition due to sparks or high heat that could ignite surrounding vegetation, as discussed in response b, above. SCE has proposed implementation of APMs as part of the Proposed Project. Per APM HAZ-3, SCE would develop and implement a project-specific Fire Prevention and Emergency Response Plan, which would include specific fire prevention protocols and emergency procedures to reduce wildfire risk during construction of the Proposed Project.

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Additionally, SCE would implement standard fire prevention protocols during construction activities and would comply with applicable laws and regulations. Therefore, with implementation of APM HAZ-3 and compliance with standard fire prevention protocols, construction of the Proposed Project would not exacerbate wildfire risks. Impacts would be less than significant.

#### **Operation and Maintenance**

The Proposed Project itself involves the replacement and modification of existing power lines and associated infrastructure. The Proposed Project would rebuild the existing subtransmission lines in the same alignment as the existing lines. Since the proposed subtransmission lines are replacing the existing lines, the subtransmission lines are an inherent component of the baseline fire risk of the area, and rebuilding the subtransmission lines with modern infrastructure installed to current CPUC guidelines would not exacerbate the fire risk in the area.

Operation and maintenance activities for the Proposed Project would be carried out in the same or similar manner as those conducted for the existing infrastructure. However, in some cases, rebuilt structures would not be accessible via existing access roads, and could only be accessed on foot, by helicopter, or by creating temporary access areas. New temporary access that would be created during operation of the Proposed Project could exacerbate fire risk by allowing new vehicle and equipment access that could ignite fire in vegetated areas.

SCE would continue to implement its standard fire prevention protocols during O&M activities, comply with applicable laws and regulations, and participate in the Red Flag Fire Prevention Program. Among the O&M activities that would continue after construction of the Proposed Project would be ongoing implementation of SCE's 2023–2025 Wildfire Mitigation Plan in areas designated by the CPUC as Fire Threat Area Tier 3 (Extreme) or Tier 2 (Elevated). The Wildfire Mitigation Plan describes strategies, programs, and activities that are in place, being implemented or under development by SCE to proactively address and mitigate the threat of electrical infrastructure associated ignitions that could lead to wildfires. Therefore, operation and maintenance of the Proposed Project would not exacerbate fire risks. Impacts would be less than significant.

#### **Required APMs and MMs: APM HAZ-3**

**d) 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.**

#### **Construction**

A majority of the Project area is located in valley areas that would not be susceptible to post-fire slope instability. The Proposed Project is located in areas of relatively steep slopes at the southern end of the alignment, where it climbs into the mountains around the Gorman and Banducci substations. These steeper slopes allow fire to spread quickly upwards and burn up hillsides. These localized areas may be susceptible to post-fire slope instability; however, these areas are generally sparsely populated or have few structures that are susceptible to fire. The



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Stallion Springs Community Services District (CSD) is downslope of Segments 4 and 5 and is surrounded by mountain ranges. Due to the proximity of Stallion Springs CSD to the Proposed Project and the steep slopes surrounding the community, the Proposed Project could expose people or structures to risks as a result of runoff, post-fire slope instability, or drainage changes if the Proposed Project caused a wildfire on the hillslope adjacent the Stallion Springs CSD. SCE has proposed implementation of APMs as part of the Proposed Project. Implementation of APM HAZ-3 requires the development of a Fire Prevention and Emergency Response Plan that covers procedures for fire reporting and response, crew training, and fire suppression and communication equipment requirements.

Therefore, due to the generally flat topography and implementation of APM HAZ-3 to prevent a fire in steeply sloping area, construction of the Proposed Project would not cause post-fire slope instability such as downstream or downslope flooding or landslides. Impacts would be less than significant.

#### **Operation and Maintenance**

Operation and maintenance activities for the Proposed Project would be carried out in the same or similar manner as the existing infrastructure. As discussed previously, the Proposed Project would replace an existing subtransmission line with infrastructure that would present reduced fire risk; therefore, no impacts would occur.

**Required APMs and MMs:** APM HAZ-3

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