#### 3.18 WILDFIRES

#### 3.18.1 INTRODUCTION

This section describes existing conditions and potential impacts related to wildfires associated with construction and operation and maintenance (O&M) of the modified project. This analysis concludes that impacts with regards to wildfires will be less than significant. The project's potential effects associated with wildfires were evaluated using the significance criteria set forth in Appendix G of the California Environmental Quality Act (CEQA) Guidelines. The conclusions are summarized in Table 3.18-1 and discussed in more detail in Section 3.8.4, Applicant-Proposed Measures and Potential Impacts.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			$\boxtimes$	
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?		$\boxtimes$		
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?				
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?				

#### 3.18.2 REGULATORY BACKGROUND AND METHODOLOGY

#### 3.18.2.1 Regulatory Background

The following subsections contain an overview of regulations related to wildfires and related hazards.

#### Federal

No federal regulations regarding wildfires apply to this project.

#### State

#### California Department of Forestry and Fire Protection (CAL FIRE)

Pursuant to Public Resources Code (PRC) Sections 4201-4204 and Government (Gov't) Code Sections 51175-89, the California Department of Forestry and Fire Protection (CAL FIRE) has created Fire Hazard Severity Zone (FHSZ) maps for the state that identify areas that are within state or local responsibility for preventing or suppressing fires. These maps identify areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. The FHSZ zones then define the application of various mitigation strategies to reduce risks associated with wildland fires. State Responsibility Areas (SRAs) are areas of the state in which the financial responsibility of preventing and suppressing fires has been determined to be primarily the responsibility of the state (PRC Section 4201) and Local Responsibility Areas (LRAs) are areas in which the financial responsibility of preventing and suppressing fires is primarily the responsibility of local agencies, including cities and counties (Gov't Code Sections 51175-51189). State Responsibility Areas (SRAs) were originally mapped by CAL FIRE in 1985 and Local Responsibility Areas (LRAs) in 1996.

Within SRAs, the Director of CAL FIRE has designated areas as moderate, high and very high fire hazard severity zones. (PRC Section 4202.) Outside of SRAs – within LRAs – the Director of CAL FIRE was charged with recommending the locations of very high fire hazard severity zones (VHFHSZ). (Gov't Code Section 51178.) These recommendations were to be reviewed and adopted in ordinances by local agencies (Gov't Code Section 51179), although not all local agencies have complied. All designations are mapped on the CAL FIRE website.

#### California Public Resources Code (PRC)

PRC Sections 4290 to 4293 identify construction and O&M requirements to minimize fire hazards for structures located in SRAs, in which the financial responsibility of preventing and suppressing fires has been determined to be primarily the responsibility of the state. These PRC sections include the following:

- PRC Section 4290 was adopted to establish minimum wildfire protection standards in conjunction with building, construction, and development of all residential, commercial, and industrial buildings in SRAs. Under this section, all residential, commercial, and industrial building construction within SRAs must provide for basic emergency access and perimeter wildfire protection measures, as specified in the PRC. Local standards that exceed those of PRC 4290 supersede PRC 4290.
- PRC Section 4291 addresses requirements for maintaining defensible space around buildings in SRAs.
- PRC Section 4292 addresses power line hazard reduction. It identifies the requirements for firebreaks around "any pole or tower which supports a switch, fuse, transformer, lightning arrester, line junction, or dead end or corner pole" in wildland areas.
- PRC Section 4293 provides specific clearances for power lines in wildland areas.

#### Rules for Overhead Electric Lines

General Order (GO) 95 of the California Public Utilities Commission (CPUC) regulates all aspects of design, construction, and O&M of overhead electrical power lines and fire safety hazards for utilities subject to its jurisdiction. GO 165 imposes inspection requirements for

transmission and distribution lines, and GO 166 requires emergency response procedures to respond to electric system failures, major outages, or hazards posed by damage to electric utility facilities. Rule 11 enables electric utilities to suspend customer service when minimum vegetation clearance requirements are not met.

On February 5, 2014, the CPUC adopted its Decision Adopting Regulations to Reduce the Fire Hazards Associated with Overhead Electric Utility Facilities and Aerial Communications Facilities. (Decision 14-02-015.) In addition to updating various GO 95 requirements and ordering further study, the decision called for creation by the CPUC of a High Fire-Threat District (HFTD) map identifying zones of high hazard, elevated risk and extreme risk for destructive utility-associated wildfires. On December 21, 2017, the CPUC issued its Decision Adopting Regulations to Enhance Fire Safety in the High Fire Threat District, adding statewide HFTD map requirements to GO 95 and enhancing GO 95's fire safety regulations within HFTD areas. (Decision 17-12-024.) The decision also strengthened GO 165 and 166 requirements, and expanded Rule 11 concerning when utilities can disconnect service to customers who obstruct vegetation management activities.

In January 2018, the CPUC adopted its statewide HFTD Map. The HFTD Map designates three areas where there is an increased risk from wildfires: Tier 3 (extreme fire risk), Tier 2 (elevated fire risk), and Zone 1 (USFS and CAL FIRE Tree Mortality High Hazard Zone Tier One not included in Tier 3 or Tier 2). Tier 2 fire-threat areas depict areas where there is an elevated risk (including likelihood and potential impacts on people and property) from utility-associated wildfires. Tier 3 fire-threat areas depict areas where there is an extreme risk (including likelihood and potential impacts on people and property) from utility-associated wildfires (CPUC, 2018a). These CPUC designations do not replace CAL FIRE's fire hazard severity zones.

On October 25, 2018, the CPUC entered an Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018), R.18-10-007. The decision implemented SB 901's additions to Public Utilities Code Section 8386 requiring that PG&E and other utilities submit wildfire mitigation plans. PG&E submitted its Amended 2019 Wildfire Safety Plan on February 6, 2019, which "describes the enhanced, accelerated, and new programs that PG&E is and will aggressively continue to implement to prevent wildfires in 2019 and beyond."

#### Fire Prevention Standards for Electric Utilities

The Fire Prevention Standards for Electric Utilities (CCR Title 14, §§ 1250-1258) provide definitions, maps, specifications, and clearance standards for applying the requirements of PRC Sections 4292 - 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.

#### Hazardous Waste Control Law

#### Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (CCR Title 27) was mandated by the State of California in 1993. The Unified Program has six elements, including the Uniform Fire Code Hazardous Materials Management Plans and Hazardous Materials Inventory Statements.

At the local level, this program is accomplished by identifying a Certified Unified Program Agency (CUPA) that coordinates all of these activities to streamline the process for local businesses. The Sonoma County Fire and Emergency Services Department is approved by the Cal/EPA as the CUPA for Sonoma County. (Cal/EPA 2019.)

#### Local

Because the CPUC has exclusive jurisdiction over the siting, design, and construction of the project, the project is not subject to local discretionary regulations. This section provides information on Sonoma County's local fire hazard mapping and emergency response policies for informational purposes and to assist with CEQA review.

#### Sonoma County General Plan 2020 Public Safety Element

The General Plan includes a Public Safety Element with goals and policies to reduce damage from wildland fires and establishes the following goal:

• GOAL PS-3: Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires

The Public Safety Element includes mapping of the "High" and "Very High" Wildland Fire hazard zones as identified in the County's 2011 Hazard Mitigation Plan and consistent with the areas designated by CAL FIRE's mapping. The Public Safety Element uses the hazard mitigation plan and existing data on wildland and urban fire hazards to guide new development and to help reduce damage from fire hazards.

#### Sonoma County General Plan Circulation and Transit Element

While Sonoma County does not appear to have an adopted emergency response or evacuation plan, the Sonoma County General Plan Circulation and Transit Element, amended in 2016, contains Policy CT-4j related to emergency response on local roads:

(1) Design local roads for reasonable access by emergency and service vehicles.

(2) Design traffic calming improvements to accommodate local circulation, to accommodate emergency vehicles where possible, to reduce speeds, to promote the safety of pedestrian and bicycle traffic, and to discourage truck traffic and through traffic, particularly during peak periods.

#### Sonoma County Emergency Management Division

The Emergency Management Division of the Sonoma County Fire and Emergency Services Department is responsible for the planning, coordination of response, recovery, and mitigation activities related to county-wide emergencies and disasters. It serves as the primary coordination point for emergency management's communication flow between the Federal, State, and local levels, and is responsible for developing emergency operation plans for the county, cities, and districts in Sonoma County, conducting training and educational outreach programs related to emergency preparedness, and sponsoring emergency management training.

#### Sonoma County Transportation Authority

The Sonoma County Transportation Authority (SCTA) approved the Comprehensive Transportation Plan 2040 in 2016. Among its long-term goals is congestion reduction on County roadways, specifically to reduce person hours of delay (PDH) by 20% below 2005 levels by 2040. The Plan notes that congestion causes, among other negative impacts, longer emergency response times.

#### 3.18.2.2 Methodology

The potential for activities and equipment to pose fire hazards was evaluated through review of the CAL FIRE and CPUC fire hazard maps and maps contained in the Safety Element of the Sonoma County General Plan. CPUC, PG&E and Sonoma County fire hazard rules and policies were reviewed.

#### 3.18.3 Environmental Setting

#### Sonoma County

The modified project, in the Southern Segment, is located entirely in unincorporated Sonoma County. The Southern Segment originates at Fulton Substation in an agricultural area, crosses Highway 101, and then extends along Lowell Road, Mark West Common's Circle and Faught Road through residential and rural residential areas, ending in Shiloh Ranch Regional Park near its southwest corner.

The CAL FIRE High Fire Severity Zone (HFSZ) maps show most of the modified project within a Local Responsibility Area (LRA) in unincorporated Sonoma County. A "very high fire hazard severity zone" is defined in Gov't Code section 51177 (i) as an area identified by CAL FIRE that is not in a state responsibility area and meets the criteria set out in section 51178. The Sonoma County HFSZ map indicates there are no "very high fire hazard severity zones" (VHFHSZs) within this area, or anywhere within unincorporated Sonoma County. (CAL FIRE HFSZ maps.) The northern 470 feet of the Southern Segment, in Shiloh Ranch Regional Park, is in a State Responsibility Area (SRA). This area is classified as being within a moderate fire hazard severity zone on the CAL FIRE HFSZ maps.

The recent CPUC mapping of fire hazard zones indicates that all but the northern 470 feet of the revised project area is also outside of any mapped fire hazard zones on the CPUC's High Fire-Threat District (HFTD) map. However, the northern extent of the Southern Segment, in Shiloh Ranch Regional Park, includes approximately 220 feet of the project alignment that is categorized as Tier 2 elevated risk, including Pole 23 and the western half of Pull Site 6, and approximately 250 feet that is Tier 3 extreme risk containing the eastern half of Pull Site 6. (CPUC, 2018b.)

Fire protection services and equipment near the existing utility lines are discussed in detail in Section 3.16.1 of the MND, Utilities and Public Services. That discussion is incorporated herein by reference.

#### 3.18.4 APPLICANT-PROPOSED MEASURES AND POTENTIAL IMPACTS

The following subsections describe significance criteria for impacts related to wildfires derived from Appendix G of the CEQA Guidelines, and assess potential project-related construction and operational impacts related to wildfires.

#### 3.18.4.1 Significance Criteria

According to Section 15002(g) of the CEQA Guidelines, "a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project." As stated in Section 15064(b) of the CEQA Guidelines, the significance of an activity may vary with the setting. Per Appendix G of the CEQA Guidelines, the potential significance of project impacts related to wildfires was evaluated for each of the criteria listed in Table 3.8-1, as discussed in Section 3.8.4.3, Potential Impacts.

#### 3.18.4.2 Applicant-Proposed Measures

The "Impact Analysis" discussion in Section 3.8.3 of the 2017 Final MND analyzed impacts from wildfires that would occur during construction, operation, and maintenance of the proposed project (CPUC 2017: Final MND pages 3.8-4 to 3.8-12). That discussion is hereby incorporated by reference.

Section 3.8.4 of the 2017 Final MND set forth the required Applicant Proposed Measures and Mitigation Measures. They include three related to the prevention of wildfires:

#### APM HM-3: Smoking and Fire Rules

Smoking will not be permitted on site, except in barren areas that measures a minimum of 20 feet in diameter and are cleared to mineral soil. Under no circumstances will smoking be permitted during the fire season (approximately July through October) while employees are operating equipment, or while walking or working in grass and woodlands.

#### APM HM-4: Carry Emergency Fire Suppression Equipment

PG&E construction crew trucks and large equipment shall have, at a minimum, a standard round-point shovel and a fire extinguisher. If construction activities likely to cause sparks (e.g., welding, grinding, or grading in rocky terrain) are conducted, emergency fire tool boxes shall be readily available to crews. The emergency fire tool boxes shall contain fire-fighting items such as shovels, axes, and water.

#### MM Hazards-2: Construction Fire Prevention Plan

PG&E shall prepare a Construction Fire Prevention Plan that addresses procedures for fire prevention at active construction sites. The Construction Fire Prevention Plan shall include

requirements for carrying emergency fire suppression equipment, conducting "tailgate meetings" that cover fire safety discussions, restricting smoking, idling vehicles, and restricting construction during red flag warnings. The Construction Fire Prevention Plan shall address the following fire risk reduction measures:

• Training and briefing all personnel working on the project in fire prevention and suppression methods.

• Conducting a fire prevention discussion at each morning's safety meeting.

• Storage of prescribed fire tools and backpack pumps with water within 50 feet of work activities.

• Water sources including water storage tanks or water trucks that would be used in case of a fire.

• Assigning personnel to conduct a "fire watch" or "fire patrol" to ensure that risk mitigation and fire preparedness measures are implemented, immediate detection of a fire, and to coordinate with emergency response personnel in the event of a fire.

The Construction Fire Prevention Plan shall be submitted to the CPUC for review and approval at least 30 days prior to construction within the Northern Segment.

#### 3.18.4.3 Potential Impacts

Project impacts related to wildfires were evaluated against the CEQA significance criteria and are discussed in the following paragraphs. The impact analysis evaluates potential project impacts during the construction phase and the O&M phase.

The revised project includes replacing the tubular steel poles along the approximately 1.4-mile Southern Segment of the project instead of replacing only 60 kV and 230 kV conductors; rather than replacing the entire 230 kV line in this stretch, only 400 feet of the 230 kV conductors will be replaced. The Southern Segment, located between Fulton Substation and Shiloh Ranch Regional Park, passes through unincorporated portions of Sonoma County containing agricultural and residential land uses on either side of Highway 101. The operation and maintenance activities required for the reconductored utility lines will not change materially from those currently required for the existing system; thus, no operation-related impacts will occur. Therefore, the impact analysis is focused on short-term construction activities that are required to construct the project. Long-term and continuing efforts to reduce wildfires generally within the electric utility system are also discussed.

### a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan? *Less Than Significant*

A short portion of the Southern Segment in Shiloh Ranch Regional Park is located in a state responsibility area (SRA) that has been designated by CAL FIRE as an area of moderate risk under Public Resources Code sections 4201, *et seq.* None of the modified project is located on lands classified as very high fire hazard severity zones as recommended by CAL FIRE for local responsibility areas.

The CPUC's High Fire-Threat District (HFTD) map adopted in January 2018 identifies zones of high hazard, elevated risk and extreme risk for destructive utility-associated wildfires. The

northern 470 feet of the Southern Segment is identified as being in Tier 2 and Tier 3 areas, with elevated and extreme risk for utility-associated wildfires.

The project will not substantially impair an adopted emergency response plan or emergency evacuation. As indicated in Section 3.8.3 (f) of Section 3.8, Hazards and Hazardous Materials, the project will not conflict with an adopted emergency response plan or evacuation plan. As described in Section 3.16.3 (d) of Section 3.16, Transportation and Traffic, emergency access will not be directly impacted during construction because all streets will remain open to emergency vehicles at all times throughout construction. Although lane closures may be required, at least one lane will remain open to provide access for emergency vehicles. In addition, any lane closures will be temporary and short-term, and these closures will be coordinated with Caltrans and local jurisdictions to reduce the potential temporary and short-term effects on emergency access. The project will not impair the implementation of or physically interfere with an adopted emergency response or evacuation plan; therefore, no impact will occur.

PG&E annually updates its own Company Emergency Response Plan (CERP), which is prepared and submitted to the CPUC in compliance with GO 166. The CERP includes PG&E's in-place plans and protocols for a coordinated response to emergencies. In 2018, the CERP added a Wildfire Safety Operations Center, staffed 24 hours a day, to detect, mitigate, communicate and respond to fire threat hazards throughout PG&E's service area. The project will not impair continued implementation of the CERP.

See also Section 3.8.3 (f) of Section 3.8, Hazards and Hazardous Materials, concerning PG&E's standard Hazardous Substance Control and Emergency Response procedures that include methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of project construction through operation. Sections 3.8.3 (a) and 3.9.2 (a) also indicate that PG&E will implement MM Hydrology-1 requiring a Spill Prevention, Control, and Countermeasure Plan (SPCC) Plan in accordance with Title 40, Sections 112.1 through 112.7 of the CFR, which will contain procedures for storage, handling, spill response, and disposal of hazardous materials, including fueling, maintenance, spill containment, leak inspection, and cleanup procedures. The SPCC Plan will also identify spill response materials that must be maintained in vehicles and substation sites. The project will not impair implementation of or compliance with these procedures.

# b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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? *Less Than Significant Impact With Mitigation*

As explained above, approximately 470 feet of the Southern Segment is within Shiloh Ranch Regional Park and in a state responsibility area (SRA) that has been designated by CAL FIRE as an area of moderate risk. Of this, approximately 220 feet are within an area characterized as Tier 2, elevated risk, and 250 feet as Tier 3, extreme risk, on the CPUC's HFTD map. None of the modified project is located on lands classified as very high fire hazard severity zones as recommended by CAL FIRE for local responsibility areas.

The project will not exacerbate wildfire risks in or near the SRA or elsewhere due to slope, prevailing winds or other factors that would expose project occupants to wildfire pollutants or cause the uncontrolled spread of a wildfire. The primary risk for potential fire hazards for power line work will be associated with the use of vehicles and equipment during construction that could generate heat or sparks that could ignite dry vegetation and cause a fire. An additional but less likely hazard during construction and operation would be equipment failure, which could result in a fire.

During construction, PG&E will implement APM HM-3 limiting smoking and APM HM-4 requiring workers to carry emergency fire suppression equipment to reduce the wildland fire risk in the modified project area. In addition, MM-Hazards 2 requiring a Construction Fire Prevention Plan will be implemented during construction in the Southern Segment. The Construction Fire Prevention Plan already being implemented for the Northern Segment will be followed in constructing the Southern Segment; it includes requirements regarding safe work practices, training, and fire response. See also Section 3.8.3 (h), regarding risks from wildland fires. Impacts from construction will remain less than significant with mitigation.

PG&E will continue to implement fire risk management procedures during O&M of the replaced utility lines, and no new impacts will occur. O&M activities on the utility lines will continue to include regular vegetation clearing to minimize the potential for fire. Vehicles will continue to use existing roads to access the utility lines during O&M, which will reduce the potential for vehicle heat to ignite dry vegetation and start fires.

The new steel poles and cross arms will be stronger than the existing steel poles and cross arms, increasing their ability to withstand wildfires and reducing the risk of structure or cross arm failure. For added safety, the poles will have a larger phase-to-steel separation than required by GO 95 or PG&E design criteria. The poles will also have higher conductor attachment points so that the conductors will be higher above the ground, adding distance from vegetation and structures. These factors will add to the safety of the existing utility lines, reducing risks from wildfires.

The modified project is consistent with the provisions of PG&E's Amended 2019 Wildfire Safety Plan, filed February 6, 2019 in response to SB 901 and the CPUC's Order Initiating Rulemaking in R.18-10-007. The Plan describes PG&E's wildfire reduction programs and measures, including enhanced vegetation management, inspections, system hardening, real-time weather monitoring, enhanced SCADA and other controls, and the newly-initiated Public Safety Power Shutoff (PSPS) Program. The system hardening program, an ongoing, long-term capital investment program to rebuild portions of PG&E's overhead electric distribution system, calls for replacing bare overhead distribution conductors with covered conductors, select undergrounding of distribution where appropriate, replacing equipment with equipment identified by CAL FIRE as low fire risk, and upgrading or replacing transformers to operate with more fire-resistant fluids. For both distribution and transmission lines, the Plan calls for installing more-resilient steel poles to increase pole strength and fire resistance.

As additional protection from wildfires, PG&E's Wildfire Safety Operations Center will be staffed 24 hours a day to detect, mitigate, communicate and respond to fire threat hazards throughout PG&E's service area.

## c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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? *No Impact*

As explained above, a portion of the project is located in or near an SRA that has been designated by CAL FIRE as an area of moderate risk; a portion of that area is also in Tier 2 and Tier 3 areas on the CPUC's Fire Hazard Severity Zone map.

The modified project will replace existing poles and conductors in an existing utility line corridor and will not require the installation or maintenance of new infrastructure. PG&E will continue to implement fire risk management procedures during O&M of the existing lines, including the enhanced wildfire reduction programs and measures described in PG&E's Amended 2019 Wildfire Safety Plan, and no new impacts will occur.

### d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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? *Less Than Significant Impact*

As explained above, a portion of the project is located in or near an SRA that has been designated by CAL FIRE as an area of moderate risk; a portion of that area is also in Tier 2 and Tier 3 areas on the CPUC's Fire Hazard Severity Zone map.

The modified project will not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes due to wildfires. The modified project will replace poles and conductors on an existing utility line and will not change the drainage or topography of the Southern Segment. No structures or work areas will be located within a 100-year flood hazard area. As indicated in Section 3.6.2 (c) of Geology, Soils and Mineral Resources, the project will not create new risks from landslides. Similarly, as indicated in Section 3.9.2, the modified project will not include changes related to existing drainage patterns or create new risks due to downslope or downstream flooding. See also Sections 3.9.2 (h) and (i) of the 2017 Final MND.

#### 3.18.5 REFERENCES

Sonoma County Hazard Mitigation Plan Update (2016 Sonoma County)

CAL FIRE. 2008a. Sonoma County – Fire Hazard Severity Zones in Local Responsibility Area. Department of Forestry and Fire Protection.

2008b. Sonoma County – Fire Hazard Severity Zones in State Responsibility Area. Department of Forestry and Fire Protection.

California Environmental Reporting System. California Environmental Protection Agency (Cal/EPA) CUPA Directory. Online: https://cersapps.calepa.ca.gov/Public/UPAListing. Accessed on March 29, 2019.

CPUC High Fire-Threat District (HFTD) map (CPUC, January 2018)

Pacific Gas and Electric Company. Company Emergency Response Plan (CERP) (October 26, 2018)

Pacific Gas and Electric Company. Amended 2019 Wildfire Safety Plan (February 6, 2019)