



Staff Report

File #: 24-0373

REQUEST FOR CITY COUNCIL ACTION

DATE: 05/15/2024

TO: Honorable Mayor and City Council Members

FROM: Utilities Department

SUBJECT:

RESOLUTION ADOPTING THE CITY OF CORONA UTILITIES DEPARTMENT WILDFIRE MITIGATION PLAN FOR 2024

EXECUTIVE SUMMARY:

This staff report asks the City Council to adopt Resolution No. 2024-026 for the adoption of the Wildfire Mitigation Plan. For compliance under Senate Bill 901 and Senate Bill 1054, publicly owned utilities must update their wildfire mitigation plans annually to address any conditional changes to the electrical system that might alter the previous plan and to submit the new plan to the Wildfire Safety Advisory Board by July 1st of each year.

RECOMMENDED ACTION:

That the City Council:

- a. Hold a public hearing regarding the Wildfire Mitigation Plan.
- b. Adopt Resolution No. 2024-026, adopting the City of Corona Utilities Department Wildfire Mitigation Plan.
- c. Authorize the City Manager, or his designee, to make minor plan modifications and submit to the State to ensure compliance with State legislation.

BACKGROUND & HISTORY:

In 2008, the California Public Utilities Commission (CPUC) initiated a proceeding to address fires related to electric utility infrastructure, following a series of wildfires in 2007 and 2008. This proceeding aimed to establish new industry standards that would reduce the risk of electric line-ignited wildfires, with a focus on areas of the state where wildfire risks are elevated. In 2012, the CPUC adopted three interim fire maps that designated areas of the State where stricter inspection

and vegetation clearance requirements would apply to overhead utility poles and equipment. These interim maps were based on generalized wildfire threats rather than areas at a unique risk of electric line-ignited fires. The CPUC acknowledged the need for an improved map. In the same 2012 decision, the CPUC directed parties to develop a more precise statewide fire map that identified areas of the State at an elevated risk of electric line-ignited wildfires.

In 2016, Governor Brown signed Senate Bill (SB) 1028, which required publicly owned utilities to identify additional wildfire mitigation measures that could be taken if the publicly owned utility's governing board found that its overhead electric lines and equipment posed a significant risk of causing a catastrophic wildfire. SB 1028 required that the publicly owned utility's governing board base this determination on "historical fires and local conditions" and consult with local fire departments and other entities with responsibilities to control wildfires within the relevant area. These requirements were specified in the newly added Public Utilities Code (PUC) Section 8387.

In 2018, the CPUC completed the development of the statewide Fire Threat Map that designates areas of the State with an elevated risk of electric line-ignited wildfires. This updated map incorporated historical fire data, fire-behavior modeling, fuel assessments, weather modeling, and many other factors. The map development and approval process involved a detailed review by the relevant utility staff and local fire officials, a peer review process, and ultimate approval by a team of technical experts led by the California Department of Forestry and Fire Protection. The California Public Utilities Commission's Fire Threat Map includes three Tiers/Levels of fire threat risk. Tier 1 consists of areas that have the lowest hazards and risks. Tier 2 consists of areas with an *elevated risk* for destructive electric-line-ignited wildfires. Finally, Tier 3 consists of areas with an *extreme risk* for destructive electric line-ignited wildfires.

The Utilities Department (UD) staff reviewed the CPUC's Fire Threat Map and determined that the City *does not* have any overhead electric utility infrastructure located in an area designated as either Tier 2 (elevated risk) or Tier 3 (extreme risk). The City has electric utility infrastructure in a Tier 1 area that includes overhead electric lines, consisting of 3 poles spanning roughly 78 feet and totaling approximately 105 linear feet of overhead cable, including the dive to underground cable. Staff also reviewed historical fire data and local conditions. Based on this review, staff concluded UD's electric lines and equipment have minimal overhead exposure and did not pose a significant wildfire risk.

On September 19, 2018, the City Council adopted Resolution No. 2018-099, which adopted staff's recommendation and found that UD's overhead electric lines and equipment did not pose a significant risk of causing a catastrophic wildfire. On June 7, 2023, the City Council adopted Resolution No. 2023-023, adopting the 2023 Electric Utility Wildfire Mitigation Plan (WMP). Under SB 1028, UD was not required to identify any additional wildfire mitigation measures.

ANALYSIS:

In 2018, Governor Brown signed SB 901, which addressed various wildfire prevention, response, and recovery issues. SB 901 substantially revised PUC Section 8387, eliminating the prior process established by SB 1028 and requiring all publicly owned utilities (POUs) (regardless of size or wildfire risk) to develop a wildfire mitigation plan. Under the amended PUC Section 8387, all POUs must present a wildfire mitigation plan to their governing Board before January 1, 2020, and annually

thereafter. PUC Section 8387(b)(2) specifies the topics that must be addressed in the POU's wildfire mitigation plans. These include:

- (a) the responsibilities of the persons tasked with executing the plan
- (b) a description of the POU's wildfire mitigation objectives, preventative strategies, and programs
- (c) a description of the metrics the POU will use to evaluate the wildfire mitigation plan's performance and discussion of how those metrics informed the current wildfire mitigation plan
- (d) protocols for disabling reclosers and de-energizing portions of the electrical system
- (e) procedures for notifying customers who may be impacted by deenergizing of electrical lines
- (f) plans for vegetation management and inspections
- (g) identification, description, and prioritization of all wildfire risks within the POU's service territory
- (h) identification of any area in the POU's service territory that is a higher wildfire risk than is identified in a commission fire threat map
- (i) a methodology for identifying and presenting enterprise-wide safety and wildfire-related risk
- (j) a statement of how the POU will restore service after a wildfire
- (k) a description of the processes and procedures the POU will use to monitor and audit the implementation of the wildfire mitigation plan, identify any deficiencies in the plan and correct them, and monitor and audit the effectiveness of electrical line and equipment inspections

SB 901 requires that POU's present their WMP at an appropriately noticed public meeting open to public comments. The POU must also verify that the WMP complies with all applicable rules, regulations, and standards.

In 2019, SB 1054 and SB 111 were enacted, resulting in significant additional reforms relating to wildfires. As part of these reforms, SB 111 created a new state agency called the California Wildfire Safety Advisory Board (WSAB). SB 1054 requires that all POU's submit their wildfire mitigation plans to the WSAB by July 1st of each year, starting in 2020. The WSAB will then review the POU plans and provide comments and advisory opinions on the content and sufficiency of the plans.

UD has prepared and reviewed the WMP and concluded that the plan meets all the required criteria as provided in PUC Section 8387. The majority of UD's electric distribution system is located underground in conduits and vaults. The undergrounding of electrical infrastructure is an effective mitigation measure to reduce wildfire and eliminate possible ignition sources that are caused by powerlines.

The WMP includes the following minor updates; there were no major changes in the current version:

- Section IV.A CUD Roles and Responsibilities:
 - Update of the Citywide Organizational Chart
- Section IX.A Metrics and Assumptions for Measuring Plan Performance:
 - Update of metric information to align with metric tracking table in Exhibit G.
- Section IX.C Monitoring and Auditing the Plan

- Information added on potential process change for 2025.
- Exhibits:
 - Added Exhibit G Wildfire Mitigation Plan Metrics

The plan is available on the City's Utilities Department website.

SB 901 also requires that POU's have their plan reviewed by a qualified independent evaluator to assess the comprehensiveness of the plan. The independent evaluator must issue a report, present that report at a public meeting of the POU's governing board and make the report available on the POU's website. Pursuant to PUC Section 8387, the City of Corona Fire Department (CFD) reviewed UD's WMP in 2023.

CFD evaluated the electric system in relation to the CPUC's Fire Threat Map and determined that there are no overhead electric lines or equipment located in any areas designated as either Tier 2 (elevated risk) or Tier 3 (extreme risk). CFD staff also reviewed historical fire data and local conditions. Based on this review, CFD staff concluded the UD's overhead electric lines and equipment do not pose a significant wildfire risk.

CFD prepared the required qualified independent evaluator report (Exhibit 2) in 2023 which is also available on the City's Utilities Department website. Updates to the WMP in 2024 are minor, and CFD is not required to review these updates.

The WSAB is currently considering a change in requirements for small POU's, such as UD, with no overhead lines located in Tier 3 areas. The new requirement would allow POU's in this category to review their plan and provide a notification to the WSAB if no changes were required for the year. This notice will include a table with updated metrics for the year. Every third year, the WMP would require a full revision. If approved by the WSAB, UD plans to follow the updated requirement in 2025, with a full revision of the WMP planned for 2026.

Staff recommends that the City Council adopt Resolution No. 2024-026 adopting the UD WMP for 2024 as required by California state law pursuant to SB 901. The Utilities Department will submit the adopted Wildfire Mitigation Plan for 2024 to the California Wildfire Safety Advisory Board before July 1, 2024.

FINANCIAL IMPACT:

There is no fiscal impact as a result of the recommended actions.

ENVIRONMENTAL ANALYSIS:

This action is exempt pursuant to Section 15061(b)(3) of the Guidelines for the California Environmental Quality Act (CEQA), which states that a project is exempt from CEQA if the activity is covered by the general rule that CEQA applies only to projects that have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA. This action approves a plan for the implementation of preventive strategies and mitigation measures to minimize the risk of wildfires caused by electrical lines and equipment. There

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is no possibility that adopting the Wildfire Mitigation Plan will have a significant effect on the environment. Therefore, the item is exempt from CEQA.

PREPARED BY: ERIN KUNKLE, ELECTRIC UTILITY MANAGER

REVIEWED BY: TOM MOODY, DIRECTOR OF UTILITIES

Attachments:

1. Exhibit 1 - Resolution No. 2024-026
2. Exhibit 2 - City of Corona Fire Department Qualified Independent Evaluator Report