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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop
and Adopt Fire-Threat Maps and Fire-Safety
Regulations.

Rulemaking 15-05-006
(Filed May 7, 2015)

**ADMINISTRATIVE LAW JUDGE'S RULING REVISING THE
SCOPING MEMO PROPOSAL FOR THE FIRE MAP 2 WORKPLAN**

Summary

Appendix C of the *Assigned Commissioner's Scoping Memo and Ruling* dated July 15, 2016, contained a proposal for Fire Map 2 (the Scoping Memo Proposal). This ruling sets forth a revised Scoping Memo Proposal for Fire Map 2 that incorporates major elements of the proposal presented by San Diego Gas & Electric Company at the workshop held on August 11, 2016,¹ as refined at subsequent workshops (the SDG&E Proposal).

This ruling is being issued at the direction of the Assigned Commissioner and following consultation with the California Department of Forestry and Fire Protection (CAL FIRE).

1. The Revised Scoping Memo Proposal

There has been some consideration of the original Scoping Memo Proposal and the SDG&E Proposal at workshops held in this proceeding on August 11, 18, 19, 29, and 30, 2016. Based on these workshops, it appears that the original Scoping Memo Proposal may better protect public safety by explicitly

¹ SDG&E's presentation at the workshop on August 11, 2016, was entered into the record of this proceeding pursuant to a ruling issued on August 17, 2016.

incorporating into Fire Map 2 the following: (1) areas that are classified as a “High” fire threat on CAL FIRE’s Fire Resource and Assessment Program (FRAP) map of fire threats, and (2) communities at risk from wildfire. The SDG&E Proposal appears to have the advantage of being easier to operationalize.

To combine the advantages of both proposals, this Ruling revises the original Scoping Memo Proposal to incorporate major elements of the SDG&E Proposal. Under the Revised Scoping Memo Proposal, the map boundaries for what is now called “Shape A” under the SDG&E Proposal would be based on the following factors:

1. Cells on Fire Map 1 with a Utility Fire Threat Index value that is equal to or greater than 800.²
2. Cells on the FRAP Fire-Threat Map classified as Very High or Extreme.³
3. Historic fire perimeter data (all causes) in CAL FIRE’s FRAP data base.
4. Cells on the FRAP Fire-Threat Map classified as High.
5. The intersection of the following areas associated with communities at risk from wildfire (CARs):
 - i. Areas classified as “Very High” on CAL FIRE’s map of Fire Hazard Severity Zones (FHSZs),⁴ and

² A PDF version of Fire Map (FM) 1 was filed in this proceeding on February 16, 2016, and is available on the Commission’s Docket Card for this proceeding (R.15-05-006). The GIS version of FM 1 can be obtained in accordance with the instructions in the Notice of Availability that was concurrently filed with the PDF version of FM 1.

³ The FRAP Map (Fire Threat) has four fire-threat classes for wildland areas: Extreme, Very High, High, and Moderate. It has two classes for non-wildland areas: Non-Fuel and Not Mapped. The map is available at:
http://frap.fire.ca.gov/data/frapgismaps/pdfs/ftthreat_map.pdf.

⁴ Maps of FHSZs are available at:
http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_maps.

- ii. Areas within the boundaries of communities on record with CAL FIRE as being at risk from wildfire and to a distance of 1.5 miles outside the edges of the CARs boundaries.⁵ In cases where there are no municipal boundaries for a particular CAR, the area for the CAR that would be used to develop Shape A would be the CAR's point location on CAL FIRE's statewide map of CARs⁶ plus a radius of 1.5 miles around the point location.⁷

The SDG&E Proposal includes Items 1 - 3, above. The Revised Scoping Memo Proposal adds Items 4 and 5. With respect to Item 4, the Revised Scoping Memo Proposal would include in Shape A the great majority of cells on the FRAP Fire-Threat Map classified as High.⁸ With respect to Item 5, the Revised Scoping Memo Proposal would include in Shape A all areas for CARs that meet the "intersecting criteria" in Item 5.⁹

Like the original Scoping Memo Proposal, the Revised Scoping Memo Proposal would have a separate layer for Tree Mortality that is independent of Shape A (and Shapes B and C). This independent layer would consist of Tier 1 zones on the United States Forest Service (USFS) and CAL FIRE's joint

⁵ There are approximately 1,329 communities currently on record with CAL FIRE as being at risk from wildfire, including the City of Laguna Beach. The list is available at: http://osfm.fire.ca.gov/fireplan/fireplanning_communities_at_risk.

⁶ A PDF version of CAL FIRE's statewide map of CARs point locations is available at: http://frap.fire.ca.gov/data/frapgismaps/pdfs/comrisk_map.pdf.

⁷ It would only be necessary to determine CAR boundaries for those CARs that are not otherwise included in Shape A as a result of applying Factors 1 - 4.

⁸ It may not be feasible to draw boundaries for Shape A that include all cells on the FRAP Fire-Threat Map classified as High. For example, some cells classified as High are isolated and could be difficult to include in a coherent Shape A.

⁹ There may be some CARs that do not meet the intersecting criteria in Item 5 (i.e., none of the CAR is within an area classified as "Very High" on CAL FIRE's map of Fire Hazard Severity Zones) and thus not included in Shape A.

map of Tree Mortality High Hazard Zones (HHZs).¹⁰ The SDG&E Proposal also includes an independent layer for Tree Mortality that is based on the USFS/CAL FIRE joint map of Tree Mortality HHZs.

The Revised Scoping Memo Proposal would mirror the SDG&E Proposal with respect to determining the boundaries of the so-called Shapes B and C. As a result, the areas covered by Shape A under the Revised Scoping Memo Proposal would be subject to adjustment when determining the boundaries of Shape B based on the utilities' and other stakeholders' knowledge of local conditions. For example, the area covered by Shape B could be less than Shape A based on utilities' demonstrable knowledge that Shape A overstates the fire hazards/risks in particular areas.

Finally, like the original Scoping Memo Proposal, the Revised Scoping Memo Proposal would use a matrix approach for applying fire-safety regulations. The SDG&E Proposal uses the same matrix approach.

Parties shall address the Revised Scoping Memo Proposal in the Fire Map 2 Work Plan in lieu of the original Scoping Memo Proposal. The Revised Scoping Memo Proposal described in this Ruling is subject to change

¹⁰ The Tree Mortality HHZs map is available at: http://www.fire.ca.gov/treetaskforce/downloads/HighHazardZones_Tier1_Tier2_lite.pdf. This map describes Tier 1 zones as "zones in direct proximity to communities, roads, and utility lines. They represent a direct threat to public safety."

based on further workshops, the Workshop Report, comments on the Workshop Report, etc.

IT IS RULED that:

1. The original Scoping Memo Proposal for Fire Map 2 that is contained in Appendix C of the *Assigned Commissioner's Ruling and Scoping Memo* dated July 15, 2016, is revised as described in the body of this Ruling.
2. In the Fire Map 2 Work Plan, parties shall address the Revised Scoping Memo Proposal in lieu of the original Scoping Memo Proposal.

Dated September 6, 2016, at San Francisco, California.

/s/ TIMOTHY KENNEY

Timothy Kenney
Administrative Law Judge