**Nancy B. Macy Comments on the Draft 2023-2025 Wildfire Mitigation Plan Guidelines - Package 1.”**

Fundamental Objectives Still Unrealizable

 As in the past, the OEIS recognizes many failures from previous Wildfire Mitigation Plans (WMPs) and their execution, endeavoring to provide guidelines to further improve them. While there are improvements in some respects, such as requiring **internal monitoring and evaluation initiatives, feedback from community engagement, and collaboration** between corporations (Lessons Learned) – and the potential of a risk-informed approach. However, these procedural improvements still allow PG&E to continue its fundamental failure to realize the basic mandates of safe, reliable and affordable electric power. *Without cutting off the power, it will continue to cause wildfires.* This is not an acceptable alternative but is allowed under the Guidelines.

PG&E is destroying thousands of miles of valuable and valued trees, causing severe environmental damage, infringing on the rights of landowners to protect their properties, undermining property values, undermining the health of riparian corridors and waterways, impacting endangered salmonids and other species, *increasing the possibility of utility associated wildfires, and exacerbating climate change*. This is not an acceptable alternative but is allowed under the Guidelines because the utilities define Risk Scenarios when an outside agency should do so.

In fact, PG&E continues to cause catastrophic wildfire because its Risk Informed Approach allows it to define risk based on the mythology that trees are the problem, rather than on the fact that the true risk is their ever-dangerous degraded and antiquated distribution and transmission infrastructures. As a result PG&E has prioritized the number of trees to fell exponentially over time. Your Guidelines not only fail to recognize the fallacy of PG&E’s assessment but is actually support it. This is untenable: it is a failure in internal monitoring; it ignores massive complaints from communities across its service area; it allows PG&E to provide piecemeal infrastructure improvements (such as replacing degraded poles in the Santa Cruz Coastal Mountains’ San Lorenzo Valley but putting the dangerous old, bare wires back up), rather than the comprehensive modernization (replacing power poles, installing steel-core triple-insulated conductor, upgrading related connectors, fuses and related equipment) that Southern California Edison (SCE) has undertaken with remarkable results.

There has never been an environmental assessment of EVM, despite its enormous potential for destructive impacts. We urge that you include CEQA EIR as a requirement before allowing this failed program to continue. This would readily fit in sec. 8.2.1.3 (Performance Metrics for the VM Program) in the Guidelines.

PG&E’s dependence upon cutting power (EPSS and PSPS) to reduce ignitions puts hundreds of thousands of residents, health and service institutions, and businesses at risk. However, there are fundamental objectives of such a plan that the Guidelines still leave up to the utility, in its Risk Informed Approach and Risk Scenarios, that enable the utility to ignore its fundamental flaws and prioritize unsafe and inadequate responses. In the Table discussing Grid design, operations, and maintenance, it lists first, “Continue overhead fire-hardening infrastructure programs.” Are the authors not aware that “hardening” is not a clearly defined concept, that PG&E’s definition varies year to year and is in no way comprehensive (in contrast to SCE). Within the past three years, PG&E provided numbers for “hardening” that included the miles of distribution lines that were taken out of service. As you look at its modeling maps, some areas are having dangerous expulsion fuses replaced, some areas are having poles replaced, some areas are having transformers replaced. This piecemeal approach, especially in high utility-associated fire threat areas, is inadequate and foolhardy.

PG&E has failed to acknowledge or respond to the thousands of complaints and challenges to its current, massive effort to remove trees (Enhanced Vegetation Management). Are you aware that Mendocino County wrote in May, 2022, to both OEIS and the Governor pleading for a MORATORIUM on EVM? (With no response as of October 24, 2022.) Are you aware that the Wopumnes Tribe is suing PG&E for removing a cherished Mother Tree without cause or need? Are you aware that residents in San Mateo and Marin Counties have engaged their Supervisors, hoping for support in stopping egregious behavior by PG&E contractors. Did you know that PG&E faces Notices of Violations from CalFire in at least four counties for failing to adhere to basic Forest Practice Rules? Are you aware that a San Lorenzo Valley (Santa Cruz County) resident allowed PG&E to take down 25 mature, healthy Douglas Firs (that had never damaged the power line since it was installed), and within a month a small Fir, weakened by the loss of the larger trees, fell and took out the power line?

The list is endless and we hope you will recognize the need to specifically require comprehensive modernization of distribution systems and to add CEQA EIR to the Guidelines.

Respectfully yours,

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