CITY OF
BIGGS
BIGGS-CA.GOV

Interim City Administrator/Director of Utilities
Rodney Harr
465 C Street
P.O. Box 307
Biggs, California 95917
www.biggs-ca.gov
(530) 868-5493

2025
Wildfire Mitigation Plan

ADOPTED

October 28, 2025

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I. OVERVIEW

A. POLICY STATEMENT

Biggs' overarching goal is to provide safe, reliable, and economic electric service to its local community. In order to meet this goal, Biggs constructs, maintains, and operates its electrical lines and equipment in a manner that minimizes the risk of catastrophic wildfire posed by its electrical lines and equipment.

B. PURPOSE OF THE WILDFIRE MITIGATION PLAN

This Wildfire Mitigation Plan describes the range of activities that Biggs is taking to mitigate the threat of power-line ignited wildfires, including its various programs, policies, and procedures. This plan is subject to direct supervision by the City of Biggs City Administrator and is implemented by the Electrical Superintendent. This plan complies with the requirements of Public Utilities Code section 8387 for publicly owned electric utilities to prepare a wildfire mitigation plan by January 1, 2020, and annually thereafter.

The City of Biggs Electric is a department within the City of Biggs.

Organization of the Wildfire Mitigation Plan

This Wildfire Mitigation Plan included the following elements:

- Objectives of the plan;
- Roles and responsibilities for carrying out the plan;
- Identification of key wildfire risks and risk drivers;
- Description of wildfire prevention, mitigation, and response strategies and programs;
- Community outreach and education;
- Metrics for evaluating the performance of the plan and identifying areas for improvement;
- Review and validation of the plan; and
- Timelines.

II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

A. MINIMIZING SOURCES OF IGNITION

The primary goal of this Wildfire Mitigation Plan is to minimize the probability that Biggs transmission and distribution system may be the origin or contributing source for the ignition of a fire. Biggs has evaluated the prudent and cost-effective improvements to its physical assets, operations, and training that can help to meet this objective. Biggs has implemented those changes consistent with this evaluation.

B. RESILIENCY OF THE ELECTRIC GRID

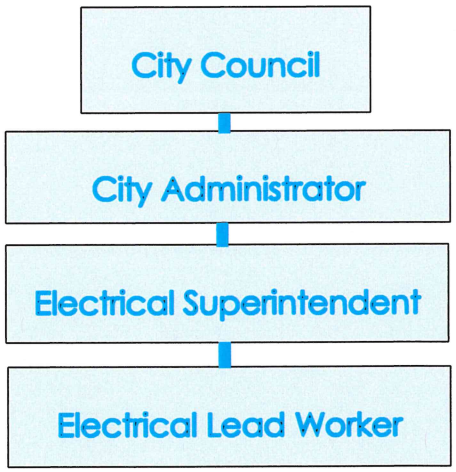
The secondary goal of this Wildfire Mitigation Plan is to improve the resiliency of the electric grid. As part of the development of this plan, Biggs assesses new industry practices and technologies that will reduce the likelihood of an interruption (frequency) in service and improve the restoration (duration) of service.

C. MINIMIZING UNNECESSARY OR INEFFECTIVE ACTIONS

The final goal for this Wildfire Mitigation Plan is to measure the effectiveness of specific wildfire mitigation strategies. Where a particular action, program component, or protocol is determined to be unnecessary or ineffective, Biggs will assess whether a modification or replacement is merited. This plan will also help determine if more cost-effective measures would produce the same or improved results.

III. ROLES AND RESPONSIBILITIES

A. CITY OF BIGGS GOVERNANCE STRUCTURE



City Council to debate, Consider and adopt any policies, regulations or ordinances recommended by the City Administrator and Electrical Department Superintendent as to the safe operations of the City of Biggs Electrical System in accordance with the Wildfire Mitigation plan

City Administrator to work with the Electrical Department Superintendent in the implementation of the Wildfire Mitigation Plan and to be a liaison to the Biggs Electrical Department during wildfire events. To be the liaison between The City of Biggs and any outside Governmental agencies in procurement of any needed resources to aid in a Wildfire Event. To be the public relation contact for the City of Biggs during a Wildfire Event.

Electrical Department Superintendent to oversee the operation of the Electrical Department. to implement The City of Biggs Wildfire Mitigation Plan as adopted by the City of Biggs Council. To be the liaison between the Electrical Department and The City of Biggs during wildfire events. To be the liaison between City of Biggs Administrator in providing aid during Wildfire Events. To provide training to the City of Biggs staff in the prevention of potential Wildfire events due to the Electrical Distribution System.

Electrical Lead Worker to oversee the day-to-day operations of the City of Biggs Electrical Distribution System. To implement The City of Biggs Wildfire Mitigation Plan as adopted by The City of Biggs' Council. To be the liaison between the Electrical Crew and the Biggs City Administrator during Wildfire Events. To report and correct any adverse conditions on the Electrical Distribution that may cause a Wildfire event.

B. WILDFIRE PREVENTION

The following are POU staff roles and responsibilities for (1) electric facility design, maintenance, and inspection; and (2) vegetation management:

- Operate system in a manner that will minimize potential wildfire risks.
- Take all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by Biggs electric facilities.
- Coordinate with federal, state, and local fire management personnel as necessary or appropriate to implement Biggs Wildfire Mitigation Plan.
- Immediately report fires, pursuant to existing Biggs Electric practices and the requirements of this Wildfire Mitigation Plan.
- Take corrective action when the staff witnesses or is notified that fire protection measures have not been properly installed or maintained.
- Comply with relevant federal, state, and industry standard requirements, including the industry standards established by the California Public Utilities Commission.
- Collect and maintain wildfire data necessary for the implementation of this Wildfire Mitigation Plan.
- Provide regular training programs for all employees having obligations for implementation of this Wildfire Mitigation Plan.
- Perform annual inspections of distribution system for tree clearances
- Perform annual tree trimming to maintain a 12-foot clearance around primary lines.

C. WILDFIRE RESPONSE AND RECOVERY

During a wildfire event the Electrical Superintendent and (or) the Lead line worker will keep in direct contact and provide regular updates as to the event status with the following Departments and organizations:

- City of Biggs Administrator
- Gridley Police Department
- CalFire
- City of Gridley Electrical Department
- City of Biggs Public Works Department

City of Biggs Electrical staff have the following obligations regarding fire prevention, response and investigation:

- Take all reasonable and practicable actions to prevent and suppress fires resulting from the City Biggs electric facilities.
- Follow Electrical Department's protocols during Red Flag Warnings.

D. COORDINATION WITH WATER UTILITIES/DEPARTMENT

Electrical Department will coordinate with the City of Biggs Public Works Department to insure the reliable delivery of water during any Red Flag or wildfire event, and as needed enlist the help of Biggs Public Works personnel to combat any wildfires caused by City of Biggs Electrical Equipment or to aid in any repairs of Biggs electrical equipment that may cause a wildfire condition.

E. COORDINATION WITH COMMUNICATION INFRASTRUCTURE PROVIDERS

During a wildfire event that involves equipment of outside agencies Communication equipment, the City of Biggs will contact the involved agencies as soon it is feasibly possible.

F. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

As a local governmental agency, the City of Biggs has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") Regulations, adopted in accordance with Government Code section 8607. The SEMS Regulations specify roles, responsibilities, and structures of communications at five different levels: field response, local government, operational area, regional, and state. Pursuant to this structure, the City of Biggs annually coordinates and communicate with the relevant safety agencies as well as other relevant local and state agencies.

Under the SEMS structure, a significant amount of preparation is done through advanced planning at the county level, including the coordination of effort of public, private, and nonprofit organizations. Butte serves as the Operational Area and is guided by the Butte County Disaster Council that is made up of representatives of Butte. The Operational Area includes local and regional organizations that bring relevant expertise to the wildfire prevention and recovery planning process. These participants include school

districts, utilities, Fire Districts, Hospitals, special districts, communications providers, and other similar organizations.

Pursuant to the SEMS structure, the City of Biggs participates in periodic training exercises.

IV. WILDFIRE RISKS AND DRIVERS ASSOCIATED WITH DESIGN, CONSTRUCTION, OPERATION, AND MAINTENANCE

A. PARTICULAR RISKS AND RISK DRIVERS ASSOCIATED WITH TOPOGRAPHIC AND CLIMATOLOGICAL RISK FACTORS

Below is a list of wildfire risk drivers that are prioritized and the City of Biggs's mitigation measure to prevent each risk within the City of Biggs service territory and surrounding areas. The primary risk factors for wildfire are the following:

1. Extended Drought - Annual Tree Trimming Program mitigates fires due to overgrown/rotting trees.
2. High Winds – Annual GO 95 Inspections and maintenance mitigate fires caused from electrical lines.
3. Weather – Annual GO 95 Inspections and maintenance mitigate weather related outages/fires.
4. Bark Beetles – Annual Tree Trimming Program allows us to visualize any tree damages related to bark beetle and can be removed before causing any damage.
5. Vegetation Health – Annual Tree Trimming Program allows to remove any overgrown or rotten vegetation before causing any damage.
6. Changing Weather Patterns (Climate Change) – Annual GO 95/128 Inspections prevent outages/fires due to hotter, dryer conditions.
7. Fire History – Gives us the information that is needed where extensive measures need to be taken to prevent any reoccurring fires.
8. Terrain – Annual inspections ensure that we have all access that is needed in case of any fire threats.

B. ENTERPRISEWIDE SAFETY RISKS

Within the City of Biggs Distribution system, the primary risk drivers for wildfire are the following:

- Electrical system equipment failure
- Falling trees or vegetation
- Animal contact with energized electric equipment
- Human error or causation

C. WILDFIRE RISK MAPPING & ASSET EXPOSURE

The City of Biggs in coordination with the California Department of Forestry and Fire protection (CAL FIRE) will maintain and regularly update a geospatial wildfire-risk map of the service territory. The map will identify:

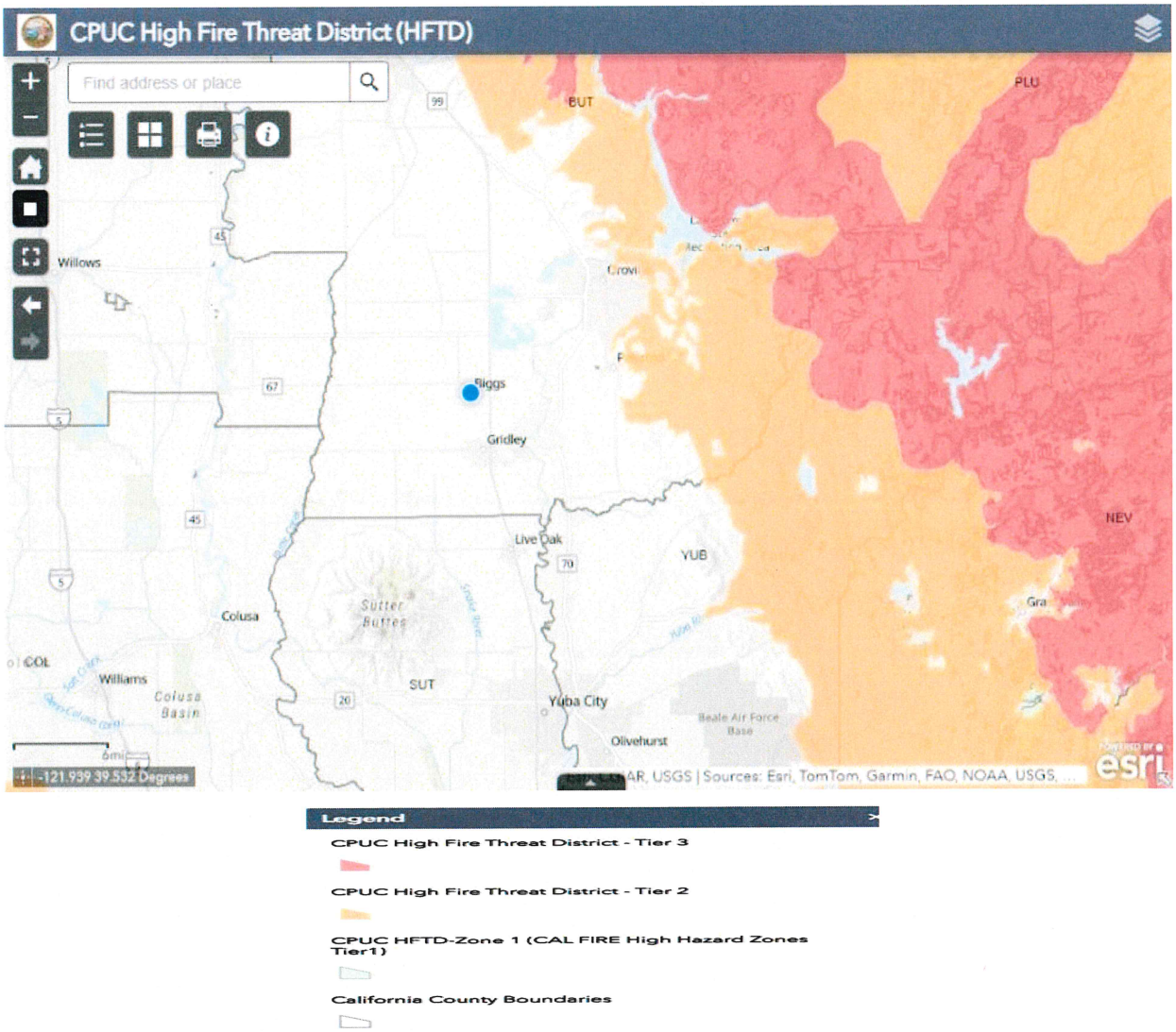
- high fire threat districts (HFTDs) as defined by the State and CPUC;

- critical infrastructure (e.g. substations, major feeders, communication towers, life-support customer clusters);
- vegetation fuel density, topography, and historical ignition/wildfire data;
- distribution and transmission line segments ranked by risk exposure.

The wildfire-risk map shall be used to prioritize vegetation management, inspection schedules, line hardening, undergrounding, de-energization thresholds, and restoration strategies. The map will be refreshed at least annually and following any major wildfire event or change in system configuration.

D. CHANGES TO CPUC FIRE THREAT MAP

Below is a copy of the CPUC Fire Threat Map that shows all Tier 1, Tier 2 and Tier 3 fire threat areas in California. The City of Biggs is outside of all three tiers for any high-level threat wildfire areas.



V. WILDFIRE PREVENTATIVE STRATEGIES

A. HIGH FIRE THREAT DISTRICT

The City of Biggs directly participated in the development of the California Public Utilities Commission' s (CPUC) Fire-Threat Map, which designates a High-Fire Threat District. In the map development process, the City of Biggs served as a territory lead, and worked with utility staff and local fire & government officials to identify the areas of the City of Biggs' service territory that are at an elevated or extreme risk of power line ignited wildfire. The City of Biggs has incorporated the High Fire Threat District into its construction, inspection, maintenance, repair, and clearance practices, where applicable.

B. WEATHER MONITORING

The City of Biggs monitors current and forecasted weather data from a variety of sources including:

- United States National Weather Service
- CalFire
- On line weather data and information
- Local news outlets

The City of Biggs assigns one of four operating conditions based on the relevant weather data and knowledge of local conditions:

(1) **Normal:** During normal conditions, no changes are made to operations or work policy.

(2) **Elevated:** During elevated fire-risk conditions, Electrical crews are asked to report any areas of concern on or around Bigg's electrical system for potential Wildfire conditions, and to address these concerns during the pre-job tail Board discussion

(3) **Extreme:** During extreme fire-risk conditions, and when working in an area at risk to wildfire conditions crews are to prioritize projects, should it be necessary to proceed with the project, crews will asked to report any areas of concern on or around the City of Biggs' electrical system for potential Wildfire conditions, and to address these concerns during the pre-job tail Board discussion and if possible to de-energize the lines during the project. ensure the job site has adequate fire suppression equipment

(4) **Red Flag:** If the National Weather Service declares a Red Flag Warning for any portion of the City of Biggs service territory, any work performed in a wildfire prone area is postponed unless it is deemed an emergency priority, should it be deemed an emergency condition, crews will asked to report any areas of concern on or around the electrical system for potential Wildfire conditions, and to address these concerns during the pre-job tail Board discussion and if possible to de-energize the lines during the project. ensure the job site has adequate fire suppression equipment, extra personnel and equipment will be enlisted to monitor the project from ground for potential fire, and to suppress any fire caused by the project. If deemed necessary, Biggs Fire Department will be contacted to stand-by during the project.

C. DESIGN AND CONSTRUCTION STANDARDS

The City of Biggs' electric facilities are designed and constructed to meet or exceed the relevant federal, state, or industry standard. The City of Biggs treats CPUC General Order (GO) 95 as a key industry standard for design and construction standards for overhead electrical facilities. The City of Biggs meets or exceeds all standards in GO 95. Additionally, the City of Biggs monitors and follows as appropriate the National Electric Safety Code.

D. VEGETATION MANAGEMENT

The City of Biggs meets or exceeds the minimum industry standard vegetation management practices. For transmission-level facilities, Biggs complies with NERC FAC-003-4, where applicable. For both transmission and distribution level facilities, the City of Biggs meets: (1) Public Resources Code section 4292; (2) Public Resources Code section 4293; (3) GO 95 Rule 35; and (4) the GO 95 Appendix E Guidelines to Rule 35. These standards require significantly increased clearances in the High Fire Threat District. The recommended time-of-trim guidelines do not establish a mandatory standard, but instead provide useful guidance to utilities. The City of Biggs will use specific knowledge of growing conditions and tree species to determine the appropriate time of trim clearance in each circumstance.

GO 95, Rule 35, Table 1

Case	Type of Clearance	Trolley Contact, Feeder and Span Wires, 0-5kv	Supply Conductors and Supply Cables, 750 - 22,500 Volts	Supply Conductors and Supply Cables, 22.5 - 300 kV	Supply Conductors and Supply Cables, 300 - 550 kV (mm)
13	Radial clearance of bare line conductors from tree branches or foliage	18 inches	18 inches	¼ Pin Spacing	½ Pin Spacing
14	Radial clearance of bare line conductors from vegetation in the Fire-Threat District	18 inches	48 inches	48 inches	120 inches

Appendix E
Guidelines to Rule 35

The radial clearances shown below are recommended minimum clearances that should be established, at time of trimming, between the vegetation and the energized conductors and associated live parts where practicable. Reasonable vegetation management practices may make it advantageous for the purposes of public safety or service reliability to obtain greater clearances than those listed below to ensure compliance until the next scheduled maintenance. Each utility may determine and apply additional appropriate clearances beyond clearances listed below, which take into consideration various factors, including: line operating voltage, length of span, line sag, planned maintenance cycles, location of vegetation within the span, species type, experience with particular species, vegetation growth rate and characteristics, vegetation management standards and best practices, local climate, elevation, fire risk, and vegetation trimming requirements that are applicable to State Responsibility Area lands pursuant to Public Resource Code Sections 4102 and 4293.

Voltage of Lines	Case 13	Case 14
Radial clearances for any conductor of a line operating at 2,400 or more volts, but less than 72,000 volts	4 feet	12 feet
Radial clearances for any conductor of a line operating at 72,000 or more volts, but less than 110,000 volts	6 feet	20 feet
Radial clearances for any conductor of a line operating at 110,000 or more volts, but less than 300,000 volts	10 feet	30 feet
Radial clearances for any conductor of a line operating at 300,000 or more volts	15 feet	30 feet

Within the High Fire Threat District, The City of Biggs performs an evaluation of every tree that has the potential to strike overhead facilities it if were to fail on an annual basis. The City of Biggs performs more frequent and detailed inspections of any such trees, and in cases where "hazard trees" (Dead, Dying, Diseased or leaning) could strike the facilities, will work with the land owner to remove the tree or portion of the tree that poses a risk.

E. INSPECTIONS

The City of Biggs meets or exceeds the minimum inspection requirements provided in CPUC GO 165 and CPUC GO 95, Rule 18. Pursuant to these rules, the City of Biggs inspects electric facilities in the Hight Fire Threat District more frequently than the other areas of its service territory. Additionally, the City of Biggs staff uses their knowledge of the specific environmental and geographical conditions to determine when areas outside of the High Fire Threat District require more frequent inspections.

If the City of Biggs staff discovers a facility in need of repair that is owned by an entity other than the City of Biggs, the City of Biggs will issue a notice to repair to the facility owner and work to ensure that necessary repairs are completed promptly.

The City of Biggs works to ensure that all inspections to be performed within the High Fire Threat District are completed before the beginning of the historic fire season. The City of Biggs monitors drought conditions and other relevant factors throughout the year to determine if inspections should be completed on a shorter timeframe.

F. WORKFORCE TRAINING

The City of Biggs has implemented work rules and complementary training programs for its workforce to help reduce the likelihood of the ignition of wildfires.

The City of Biggs has implemented into its daily operations 4 conditions based on current weather conditions.

- Normal
- Elevated
- Extreme
- Red Flag

The City of Biggs has added a Wildfire Mitigation Plan, and fire safety training to it safety training program.

G. RECLOSING POLICY

During Red Flag Warnings:

Line Reclosers- will be put in a non- reclosing setting. Should a Line Recloser open during this period, the Line reclosing device shall not be closed until the distribution line it serves has been inspected for the cause of the equipment's operation. When the equipment and distribution line is re-energized, the distribution line will be inspected for safe operation.

Substation Circuit Breaker- relays will be put in a non-reclosing setting. Should a relay operate during this period, the relay device will not be closed until the distribution line being served by the affected relay is inspected for the cause of the operation. When the substation breaker is closed the distribution line being served by the breaker will be inspected for safe operation.

H. DEENERGIZATION

The City of Biggs has the authority to preemptively shut off power due to fire-threat conditions; however, this option will only be used in extraordinary circumstances. The City of Biggs will make a case-by-case decision to shut off power based on the following considerations:

- Red Flag Warnings issued by the National Weather Service for fire weather zones that contain Biggs circuits;
- City of Biggs staff assessments of local conditions, including wind speed (sustained and gust), humidity and temperature, fuel moisture, fuel loading and data from weather stations;
- Real-time information from staff located in areas identified as at risk of being subject to extreme weather conditions;
- Input from City of Biggs/CalFire, fire experts and vegetation experts;
- Input from local and state fire authorities regarding the potential consequences of wildfires in select locations;
- Alternative ways to reroute power to affected areas;
- Awareness of mandatory or voluntary evacuation orders in place;
- Expected impact of de-energizing circuits on essential services;
- Other operational considerations to minimize potential wildfire ignitions, including the blocking of reclosers on the identified circuit(s);
- On-going fire activity throughout the City of Biggs territory and California;
- Ability to notify customers;
- Notifications to local governments and public officials; and
- Potential impacts to communities and customers

1. IMPACTS TO PUBLIC SAFETY

The following conditions may occur during a fire threat power shut down:

- Residential areas will lose power
- Schools will lose power
- Stores will lose power
- Gas stations will lose power
- Traffic signals will be on battery back-up power
- Streetlights will not work
- Water supply will be on Back-up Generation Power
- Sewer will be on Back-up Generation Power
- Police department will be on Back-up Generator Power
- Butte County Fire Station will be on Back-up Generator Power

2. CUSTOMER NOTIFICATION PROTOCOLS

The City of Biggs will make every attempt to give advance notice to its customers of any planned wildfire prevention power shut downs. Should a wildfire prevention power shut down be planned, the City of Biggs will attempt to notify its customers in the following ways:

- Signage at City Hall
- Local news paper
- Monthly Bill mailings
- Website messaging
- Social Media messaging

VI. COMMUNITY OUTREACH AND PUBLIC AWARENESS

A. STAKEHOLDER ENGAGEMENT & FIRE AGENCY COORDINATION

The City of Biggs will actively engage relevant public safety, fire protection, emergency management, and community stakeholders in the development and update of the Wildfire Mitigation Plan. Engagement activities shall include:

a. reviewing the Plan with fire agencies (local, regional, state) and incorporating their input on high-risk zones, vegetation, access, and suppression coordination;
b. conducting workshops or outreach with community members to explain PSPS protocols, backup power and safety measures, timeline expectations, and customer notifications;
c. maintaining records of stakeholder feedback, concerns, and questions, and documenting how feedback shaped Plan revisions;
d. publishing or summarizing stakeholder input in the Plan (or an appendix), including any major suggestions, concerns, or alternative proposals, and describing how they were addressed.

e. Engagement shall occur at least every plan update cycle (typically annually or triennially), and after significant events (e.g. wildfires or PSPS operations).

VII. RESTORATION OF SERVICE

City of Biggs will make every attempt to restore power to residents as soon as possible.

Priority inspections of distribution infrastructure and power restoration will be given to critical circuits such as, water, sewer, Butte County Fire Station, and Schools.

VIII. EVALUATION OF THE PLAN

A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

City of Biggs will track two metrics to measure the performance of this Wildfire Mitigation Plan: (1) number of fire ignitions; and (2) wires down within the service territory.

B. SCENARIO MODELING & STRESS TESTING

To ensure robustness of wildfire mitigation strategies under adverse conditions, the City of Biggs will conduct scenario analyses at least biennially (or following significant climatic / infrastructure changes). Scenarios shall include, but are not limited to:

- extended periods of Red Flag / critical fire weather (e.g. high winds + low humidity);
- multi-day outages or Public Safety Power Shutoff (PSPS) events affecting key circuits;
- simultaneous faults or equipment failures under worst-case weather;
- impacts of load, customer medical-baseline service needs, and critical facility dependencies.
- Modeling and stress tests shall inform thresholds for operational timelines, prioritization of infrastructure investments, resource staging, and backup power needs. Lessons and data from prior seasons shall feed into subsequent scenario definitions and assumptions to improve resilience year over year.

METRIC 1: FIRE IGNITIONS

For purposes of this metric, a fire ignition is defined as follows:

- City of Biggs facility was associated with the fire;
- The fire was self-propagating and of a material other than electrical and/or communication facilities;
- The resulting fire traveled greater than one linear meter from the ignition point; and
- Biggs has knowledge that the fire occurred.

In future Wildfire Mitigation Plans, the City of Biggs will provide the number of fires that occurred that were less than 10 acres in size. Any fires greater than 10 acres will be individually described.

METRIC 2: WIRES DOWN

The second metric is the number of distribution and transmission wires downed within the service territory. For purposes of this metric, a wire down event includes any instance where an electric transmission or primary distribution conductor falls to the ground or on to a foreign object. The City of Biggs will divide the wires down metric between wires down inside and outside of the High Fire Threat District.

Biggs will not normalize this metric by excluding unusual events, such as severe storms. Instead, Biggs will supplement this metric with a qualitative description of any such unusual events.

C. IMPACT OF METRICS ON PLAN

In the initial years, the City of Biggs anticipates that there will be relatively limited data gathered through these metrics. However, as the data collection history becomes more robust, the City of Biggs will be able to identify areas of its operations and service territory that are disproportionately impacted. Biggs will then evaluate potential improvements to the plan.

D. RISK-INFORMED PRIORITIZATION AND INVESTMENT PLANNING

The City of Biggs will prioritize mitigation measures based on a risk-based cost/benefit framework, considering both the potential severity and likelihood of ignition, and the consequence to customers and public safety. Key considerations shall include:

- potential ignition frequency and fault probability of asset types;
- fire spread potential, terrain, and access conditions;
- number and criticality of customers (e.g. life-support, hospitals, water/sewer, emergency services) served by each line or substation;
- cost of mitigation (e.g. vegetation clearing vs hardware replacement vs undergrounding vs protective devices) relative to avoided damage/loss;
- available funding, grants, and cost-sharing opportunities.
- A capital improvement / mitigation investment plan schedule shall be maintained showing projected costs, expected benefits (e.g. reduced ignitions, reduced outage impacts), and timing.
- This investment plan shall be reviewed annually and updated as new information, technology, or funding opportunities arise.

IX. INDEPENDENT AUDITOR

A. PLAN REVIEW & CONTINUOUS IMPROVEMENT

The City of Biggs will adopt a regular review cycle for the Wildfire Mitigation Plan. Key provisions:

- The Plan shall be reviewed annually, including assessment of metrics (ignitions, wires-down, PSPS activations), stakeholder feedback, event lessons learned, and changes in regulatory framework or climate risk.
- A major update (including redlines and comparison with the prior version) shall be conducted at least every three (3) years, or sooner if triggered by significant system changes, wildfire events, or regulatory rulings.

- The City of Biggs shall contract with a qualified independent evaluator (as required under §8387(c)) to assess plan comprehensiveness, performance, risk mitigation effectiveness, and implementation status; that evaluator shall issue a public report and present findings to the governing body (e.g. City Council).

Updates, evaluation findings, and plan revisions shall be posted publicly (on the City of Biggs/City website), and a summary of changes provided to key stakeholders and first responders.

B. REGULATORY & STANDARDS ALIGNMENT

This Plan is designed to ensure compliance with California statutory requirements, regulatory mandates, and industry-recognized best practices. Specifically, the City of Biggs confirms that the Plan addresses:

- Public Utilities Code § 8387 (and applicable subsections), including objectives, metrics, audit, and public review requirements.
- California Public Utilities Commission (CPUC) General Order 95 (construction and maintenance of overhead lines), General Order 165 (inspection and maintenance), and other applicable rules.
- Public Resources Code §§ 4292–4293 (vegetation and clearance requirements).
- California Office of Emergency Services (Cal OES) Standardized Emergency Management System (SEMS) definitions and coordination structure (e.g. 19 CCR § 2403(b) and related).
- Relevant national / consensus safety codes (e.g. National Electric Safety Code, NFPA) and recognized industry best practices.
- The City of Biggs will monitor regulatory developments and amend the Plan as necessary to maintain conformance with state and federal rules and wildfire-mitigation best practices.

CITY OF BIGGS
VEGETATION MANAGEMENT PLAN
(2025)

Prepared pursuant to California Public Utilities Code §8387 and Public Resources Code §§4292–4293.

Adopted by City Council Resolution No. 2025-33

CITY OF BIGGS
465 C Street | P.O. Box 307 | Biggs, CA 95917 | (530) 868-5493 | www.biggs-ca.gov

Adopted by the City Council of the City of Biggs on this 28th day of October, 2025.

Mayor: _____ Date: 10/30/2025

James 'Bo" Sheppard

Interim City Administrator /

Director of Utilities: _____ Date: 10/29/2025

Rodney Harr

Vegetation Management

To deliver your electricity safely and reliably, the City of Biggs follows a regular schedule for inspecting and trimming more than 60 miles of distribution lines and 15 miles of transmission lines in our service area. Throughout the year, the City will clear vegetation away from power lines, poles and transformers to reduce the chance of power outages. An annual tree trimming contract with contractors takes care of routine trimming and electric crews/contractors take care of emergency/dangerous trees. It is important to note that the City of Biggs does not provide tree trimming services for electrical service connected to your home. Should trees near your service line require trimming, you or your tree trimming service may call the City to de-energize the lines before the project begins. There is no charge for this service.

Inspections

To maintain a reliable system, the City of Biggs crews inspect all lines for vegetation issues at least once a year. This entails driving/walking the entire system and noting any issues to address such as lack of clearance or dead trees that pose a risk to the electric lines.

Tree Pruning

To maintain the reliability of the electrical system, the City generally needs 12 feet of space between tree canopies and overhead distribution power lines. But for fast-growing trees such as mulberry or eucalyptus, the City may need as much as 20 feet of clearance to prevent power outages. For transmission lines the City tries to keep the vegetation directly below to a minimum, and keep all trees cleared back a minimum of 20 feet.

Directional Pruning

The City removes only branches that conflict with power lines. The City uses a technique called directional pruning to redirect a tree's growth away from the lines. This technique is recommended by the International Society of Arboriculture, the American National Standards Institute and the National Arbor Day Foundation.

The City will remove entire branches where they attach to the main trunk of the tree. This technique helps protect the tree from disease and insects.

Sometimes the situation requires pruning only one side of the tree, pruning one side more than the other, or pruning just the middle of the tree. These variations are known as side pruning or "V pruning." Trees may appear unbalanced at first, but a healthy tree will cope with the changes, and its appearance will soften over time.

Tree Removal

The City cannot use direction pruning on some trees, such as redwoods or palms, because they grow straight up from a so-called central leader. When these trees are planted under power lines, the City must cut back the crown or remove the tree. The City will remove trees to protect your property from potential hazards and to prevent tree-related power outages. If the City has a need to remove a tree on your property because of a potentially hazardous situation, the City will contact you ahead of time. The City will not charge you for the removal.

Vines

Vines growing on utility poles pose a danger to line workers and the public. If the vines grow into the high voltage wires, they can conduct electricity to the ground. They also pose a climbing hazard for any line worker performing maintenance on electric, phone or cable lines. The City will remove vines from poles during each routine tree-trimming cycle. You can help by keeping vines from growing near poles.

Ground-level Equipment

The City asks that you avoid planting any kind of vegetation within 8 feet of our green metal boxes that contain pad-mounted equipment. Please don't let any invasive plants grow over the top of the equipment, which can prevent us from opening the door. For the safety of our line workers, the City will need to remove any vegetation that poses a hazard. Keeping the space around this equipment clear has the added benefit of allowing the City of Biggs Electric crews to restore power to you and your neighbors more quickly during an outage.

Herbicide Management

General

The full width of the established right of way should be treated with selective herbicide spraying to control woody-type "trees" and "brush". All vines on poles, guy wires and overhead stub poles should be treated on entire circuit. All equipment, herbicides, personnel, and materials necessary to perform the work shall be supplied by the contractor. Contractor employees involved in the application of herbicides and/or adjuvants must have all federal, state and local licenses, certificates and permits that are required by law. A licensed commercial pesticide applicator (MS) shall always be present on the job. In the event the property owners object to herbicide treatment of undesirable tree or brush species, the work shall be postponed for that area. Such problems shall be reported to City of Biggs immediately. Contractors shall be responsible for any off right of way and/or chemical drift type damages. Contractors are fully responsible for proper disposal of all chemicals and containers.

Contractors shall be responsible for locating sensitive and/or restricted non-vegetative right of way areas where herbicides, as specified on the manufacturer's label, should not be applied. All herbicide mixtures and formulations will be applied according to label directions and/or to manufacturers' recommendations. Under no circumstances shall herbicides be applied at rates exceeding label recommendations. Herbicides to be used shall be selected only from those labeled specifically for use on utility rights of ways.

Wetlands

Only a wetland approved herbicide may be used when spraying within 20' of a stream, river, pond, lake, or wetlands area. Under no circumstances shall any herbicide (wetlands approved or otherwise) be sprayed directly over water where no vegetation exists. Contractor shall not clean equipment, tanks, hoses, or other materials related to herbicide applications in streams, rivers, ponds, lakes, or wetland areas.

Documentation

Contractor shall provide City of Biggs herbicide reports of all applications. Reports shall contain the following information: the location of herbicide application, the date applied, the amount applied, the name of each herbicide being applied and the name of the certified applicator.

Transmission Rights of Way and Integrated Vegetation Management

Vegetation Management of Transmission Rights-of-Way

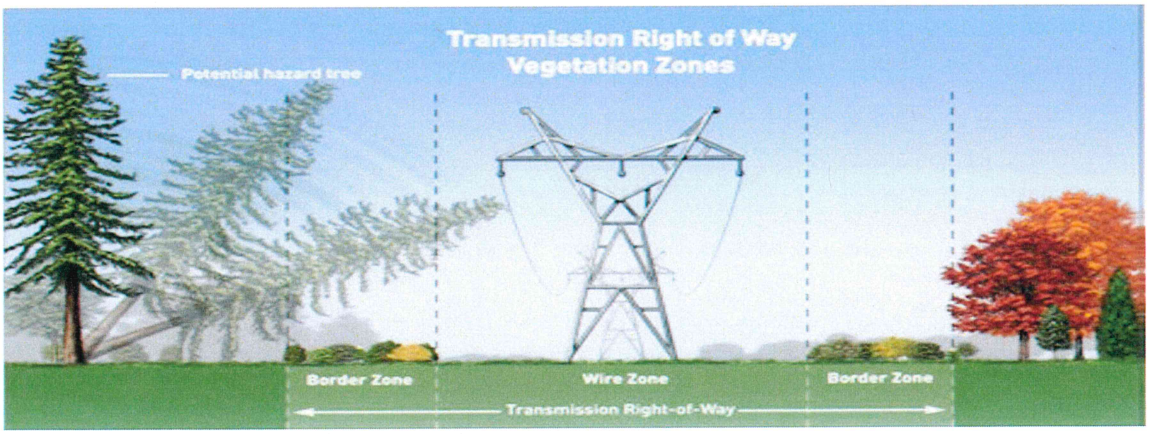
The City of Biggs Electric Department utilizes a program of Integrated Vegetation Management (IVM) to manage vegetation on transmission rights-of-ways. Properly maintained right-of-way's (ROW) are essential for the safety of the public and our workers. The long-term goal of our vegetation management program is to provide for public safety, worker safety, and environmental safety while providing for reliable service.

Integrated Vegetation Management

The first step to creating a low growing plant community is to clear rights-of-way of tall growing and incompatible plant species. This is typically accomplished either mechanically or manually. Cutting or mowing alone is ineffective because it encourages the biological response of re-sprouting. After clearing, right-of-way's are monitored for re-sprouting and reinvasion by incompatible vegetation. Once this occurs, the right-of-way will be enhanced through various methods to provide the desired outcome of a low growing plant community. Many factors are considered before an appropriate method is chosen and implemented.

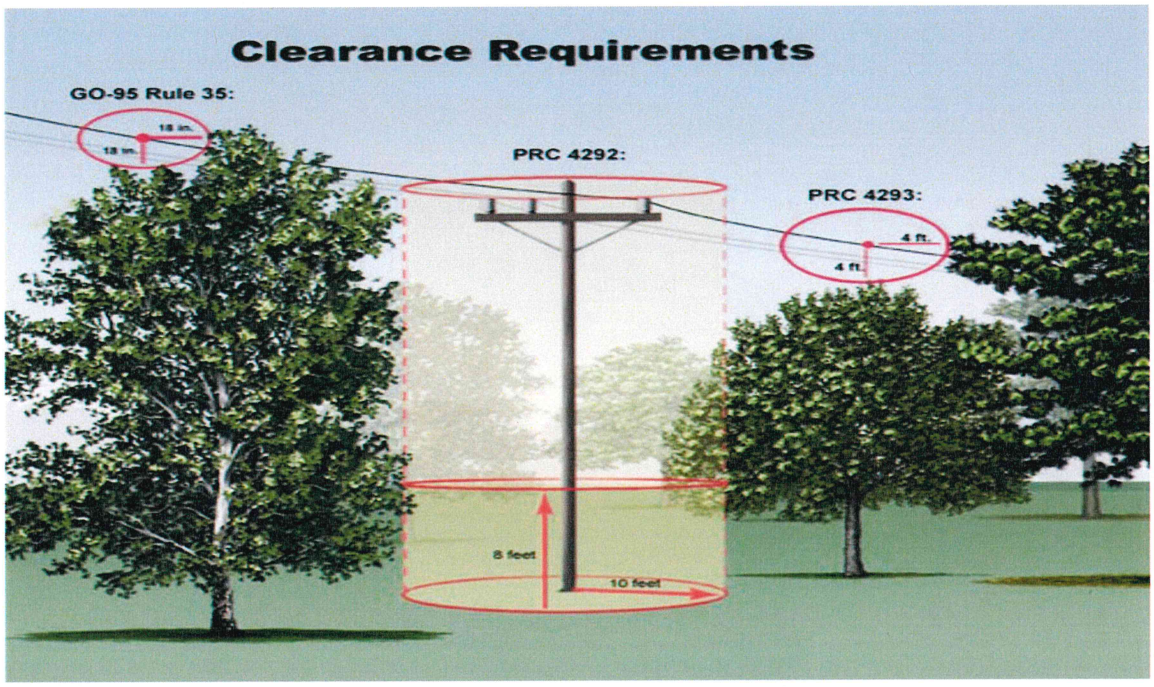
The Wire Zone Border Zone

The Wire Zone consists of low-growing shrub and grass communities directly under the transmission wires plus approximately 15' on both sides. The Border Zone, which is the portion of the right-of-way that extends from 10' outside of the wire to the edge of the ROW, is managed for taller shrubs, and brush plant community. This is the transition zone between the low-growing vegetation and taller.



Laws and Regulations:

The City of Biggs Electric Department is a California-based utility that follows the guidelines set forth by the California Public Utilities Commission (CPUC). The City of Biggs Electric Department will obtain a reasonable amount of clearance beyond the minimum requirements to allow for several years' worth of growth, potential wind sway and other environmental factors. Distance obtained from the line after a pruning cycle may be more than 20 feet for fast growing species such as a mulberry or eucalyptus trees along distribution lines and for high voltage transmission lines 4 years or 40 feet of clearance is required.



There are rules and regulations designed to ensure public safety and electric service reliability. Major regulations covering vegetation management include:

- **Public Resource Code 4292:** Firebreak Clearing Utilities are required to maintain firebreaks around poles located in wild land areas during fire season that have certain equipment with the potential to emit sparks when operating properly.

- **Public Resource Code 4293:** State Responsibility Utilities are required to maintain clearance between vegetation and high voltage power lines during fire season in wild land areas to prevent wild fires. Also requires removal of dead, diseased or dying trees that could fall into power lines.

• **General Order 95:** Utility Vegetation Management Requirements Utilities are required to maintain clearance between vegetation and high voltage power lines at all times in all areas for public safety and electric system reliability.

• **North American Electric Reliability Council (NERC) Standard FAC-003-1: Transmission Vegetation Management Standard**

FAC-003-1 is a Federal Energy Regulatory Commission (FERC) mandated standard, enforced by NERC which requires utilities to take preventative action to reduce widespread outages caused by vegetation conflicts on critical electric transmission lines over 60,000 volts. Utilities must have a formal vegetation management program that meets specific standards and maintains required clearances between vegetation and transmission electric facilities at all times in all conditions.

Public Resource Code, Section 4292: Power Line Hazard Reduction

Except as otherwise provided in Section 4296, any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or forest-covered land, brush-covered land, or grass-covered land shall, during such times and in such areas as are determined to be necessary by the director or the agency which has primary responsibility for fire protection of such areas, maintain around and adjacent to any pole or tower which supports a switch, fuse, transformer, lightning arrester, line junction, or dead end or corner pole, a firebreak which consists of a clearing of not less than 10 feet in each direction from the outer circumference of such pole or tower. This section does not, however, apply to any line which is used exclusively as telephone, telegraph, telephone or telegraph messenger call, fire or alarm line, or other line which is classed as a communication circuit by the Public Utilities Commission. The director or the agency which has primary fire protection responsibility for the protection of such areas may permit exceptions from the requirements of this section which are based upon the specific circumstances involved.

Section 1254 - Minimum Clearance Provisions

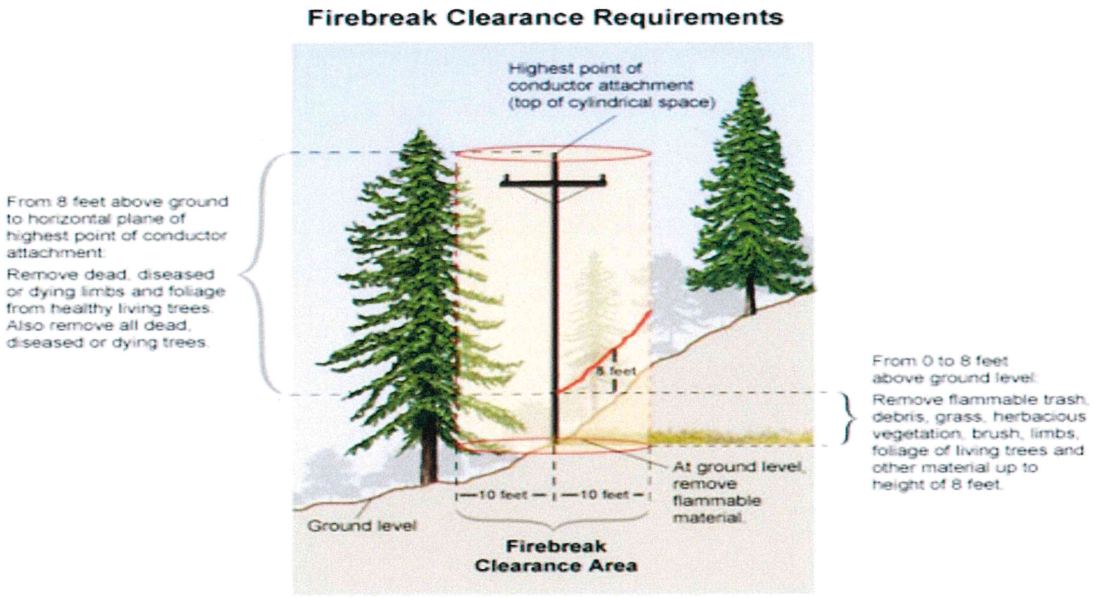
The firebreak clearances required by PRC 4292 are applicable within an imaginary cylindrical space surrounding each pole or tower on which a switch, fuse, transformer or lightning arrester is attached and surrounding each dead-end or corner pole, unless such pole or tower is exempt from minimum clearance requirements by provisions of 14, CCR, 1255 or PRC 4296. The radius of the cylindroid is 3.1 m (10 feet) measured horizontally from the outer circumference of the specified pole or tower with height equal to the distance from the intersection of the imaginary vertical exterior surface of the cylindroid with the ground to an intersection with a horizontal plane passing through the highest point at which a conductor is attached to such pole or tower. Flammable vegetation and materials located wholly or partially within the firebreak space shall be treated as follows:

• (a) At ground level - remove flammable materials, including but not limited to, ground litter, duff and dead or desiccated vegetation that will propagate fire, and;

• (b) From 0 - 2.4 m (0-8 feet) above ground level remove flammable trash, debris or other materials, grass, herbaceous and brush vegetation. All limbs and foliage of living trees shall be removed up to a height of 2.4 m (8 feet).

• (c) From 2.4 m (8 feet) to horizontal plane of highest point of conductor attachment remove dead, diseased or dying limbs and foliage from living sound trees and any dead, diseased or dying trees in their entirety.

Figure 1: Graphical representation of Section 1254 showing the minimum clearances required around a utility pole.



Public Resource Code, Section 4293: Line Clearance Guidelines

Except as otherwise provided in Sections 4294 to 4296, inclusive, any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or in forest-covered land, brush-covered land, or grass-covered land shall, during such times and in such areas as are determined to be necessary by the director or the agency which has primary responsibility for the fire protection of such areas, maintain a clearance of the respective distances which are specified in this section in all directions between all vegetation and all conductors which are carrying electric current:

a. For any line which is operating at 2,400 or more volts, but less than 72,000 volts, four feet.
b.
c. For any line which is operating at 72,000 or more volts, but less than 110,000 volts, six feet.
d. For any line which is operating at 110,000 or more volts, 10 feet.

In every case, such distance shall be sufficiently great to furnish the required clearance at any position of the wire, or conductor when the adjacent air temperature is 120 degrees Fahrenheit, or less. Dead trees, old decadent or rotten trees, trees weakened by decay or

disease and trees or portions thereof that are leaning toward the line which may contact the line from the side or may fall on the line shall be felled, cut, or pruned so as to remove such hazard. The director or the agency which has primary responsibility for the fire protection of such areas may permit exceptions from the requirements of this section which are based upon the specific circumstances involved.

General Order 95, Rule 35: Tree Pruning

Where overhead wires pass through trees, safety and reliability of service demand that tree pruning be done in order that the wires may clear branches and foliage by a reasonable distance. The minimum clearances established in Table 1, Case 13, measured between line conductors and vegetation under normal conditions, shall be maintained. (Also see Appendix E for tree pruning guidelines.)

When a utility has actual knowledge, obtained either through normal operating practices or notification to the utility, dead, rotten and diseased trees or portions thereof, that overhang or lean toward and may fall into a span, should be removed.

Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of limbs and foliage, in new construction and when circuits are reconstructed or repaired, whenever practicable. When a utility has actual knowledge, obtained either through normal operating practices or notification to the utility, that any circuit energized at 750 volts or less shows strain or evidences abrasion form tree contact, the condition shall be corrected by slacking or rearranging the line, pruning the tree or placing mechanical protection or the conductor(s).

EXCEPTIONS:

1. Rule 35 requirements do not apply to conductors, or aerial cable that complies with Rule 57.4-C, energized at less than 60,000 volts, where pruning or removal is not practicable, and the conductor is separated from the tree with suitable materials or devices to avoid conductor damage by abrasion and grounding of the circuit through the tree.
2. Rule 35 requirements do not apply where the utility has made a "good faith" effort to obtain permission to prune or remove vegetation but permission was refused or unobtainable. A "good faith" effort shall consist of current documentation of a minimum of an attempted personal contact and a written communication, including documentation of mailing or delivery. However, this does not preclude other action or actions from demonstrating "good faith". If permission to prune or remove vegetation is unobtainable and requirements of exception 2 are met, the utility is not compelled to comply with the requirements of exception 1.
3. The Commission recognizes that unusual circumstances beyond the control of the utility may result in nonconformance with the rules. In such cases, the utility may be directed by the Commission to take prompt remedial action to come into conformance, whether or not the nonconformance gives rise to penalties or is alleged

to fall within permitted exceptions or phase-in requirements. Note: Revised November 6,1992, by Resolution No. SU-15, September 20, 1996, by Decision No. 96-09-097 and January 29, 1997, by Decision No. 97-01-044.

4. Mature trees whose trunks and major limbs are located more than six inches, but less than 18 inches, from primary distribution conductors are exempt from the 19-inch minimum clearance requirement under this rule. The trunks and limbs to which this exemption applies shall only be those of sufficient strength and rigidity to prevent the trunk or limb from encroaching upon the six-inch minimum clearance under reasonable, foreseeable local wind and weather conditions. The utility shall bear the risk of determining whether this exemption applies, and the Commission shall have the final authority to determine whether the exemption applies in any specific instance, and to order that corrective action be taken in accordance with this rule, if it determines that the exemption does not apply. Note: Added October 22, 1997, by Decision No. 97-10-056.

Appendix E

The following are guidelines to Rule 35.

The radial clearances shown below are minimum clearances that should be established, at time of pruning, between the vegetation and the energized conductors and associated live parts where practicable.

Vegetation management practices may make it advantageous to obtain greater clearances than those listed below:

A. Radial clearances for any conductor of a line operating at 2,400 or more volts, but less than 72,000 volts 4 feet
B. Radial clearances for any conductor of a line operating at 72,000 or more volts, but less than 110,000 volts 6 feet
C. Radial clearances for any conductor of a line operating at 110,000 or more volts, but less than 300,000 volts 10 feet
D. Radial clearances for any conductor of a line operating at 300,000 or more 15 feet

Radial Clearances					
Case No.	Nature of Clearance	A **Span Wires (Other than Trolley Span Wires) Overhead Guys and Messengers**	B **Communication Conductors (Including Open Wire, Cables and Service Drops), Supply Service Drops of 0 - 750 Volts**	C **Tolley Contact, Feeder and Span wires, 0 - 5,000 Volts**	
13	Radial Clearance of bare line conductors from tree branches or foliage (AAA)(DDD)	—	—	18 inches (BBB)	
Radial Clearances					
Case No.	**Nature of Clearance**	D **Supply Conductors of 0 - 750 Volts and Supply Cables Treated as in Rule 57.8**	E **Supply Conductors and Supply Cables, 750 - 22,500 Volts**	F **Supply Conductors and Supply Cables, 22.5 - 300 kV**	G **Supply Conductors and Supply Cables, 300 - 550 kV(mm)**
13	Radial clearance of bare line conductors from tree branches or foliage (aaa) (ddd)	—	18 inches (bbb)	¼ pin spacing shown in table 2, Case 15 (bbb)(ccc)	½ pin spacing shown in table 2, Case 15

(aaa) Special requirements for communication and supply circuits energized at 0 - 750 volt

(bbb) May be Reduced for conductor of less than 60,000 volts when protected from abrasion and grounding by contact with tree.

(ccc) For 22.5 kV to 105 kV, minimum clearance shall be 18 inches.

(ddd) Clearances in this case shall be maintained for normal annual weather variations, rather than at 60 degrees, no wind.

CITY OF BIGGS ELECTRIC UTILITY TREE PLANTING GUIDELINES FOR NEW DEVELOPMENT

OVERHEAD ELECTRIC LINES

New trees less than 20 feet from overhead high voltage lines (12000 Volts) should be selected to have a height of 25 feet or less when fully grown. Ground separation distances may need to be increased for trees of larger canopy to maintain 10 feet of safe clearance from limbs at all times.

TREE SELECTOR WEBSITE: http://selectree.calpoly.edu

UNDERGROUND ELECTRIC LINES

Adequate room to operate electrical equipment is important to the reliability of the electric service and for the linemen to work safely. The linemen use long 8 foot fiberglass sticks to operate the equipment live when trouble is found or when system maintenance is required.

Planting near Pad Mounted Transformers

-10 feet of clearance is needed on transformer front
-3 feet on back and sides

NOTE: Pad mounted switches (PME/PMH style etc.) require 10 feet on both front and back to operate. Underground utility high voltage electric boxes/vaults should be located 10 feet from trees to avoid root damage and provide appropriate access.