

## Comments on Wildfire Safety Advisory Board Recommendations

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**From:** Indivisible Ventura <indivisibleventura@gmail.com>  
**Sent:** Monday, April 13, 2020 4:55 PM  
**To:** Wildfire Safety Advisory Board  
**Subject:** WSAB

*To Wildfire Safety Advisory Board:*

*We are community activists, very much involved with social and environmental issues. Our group has written extensively on California's application of inverse condemnation laws, and AB1054. We provided community assistance during our area's Thomas Fire. One of our co-directors lost her home in that fire, a fate shared by dozens of our friends.*

*We appreciate your analysis of the issues on Wildfire Safety. There are quite a number of very good comments overall but unfortunately important issues have not been addressed. We know from all reports and news articles that PG&E's run-to-failure business model has resulted in frayed, unsafe wires as a major source of utility associated wildfire in California. And taking out the forests en masse will not stop antiquated bare wires from sparking and breaking in high winds, causing grass fires that quickly turn into forest fires. Yet, PG&E is spending \$680 million on cutting trees and only spending \$240 million on replacing distribution conductors.*

*One of the issues we learned about after the last round of CA fires is that removing large numbers of trees is ineffective in reducing both the size and intensity of fire damage and has actually been proven to be counterproductive and environmentally damaging. We did extensive research as well as interviewed Chad Hansen, director of the John Muir Project, which we've included with references below our closing.*

*Research on the deleterious effects of continuous clear cutting is available to all, therefore we're appalled to learn of PG&E's plan to spend \$680 million on removing trees in 2020, including removing trees up to 200 feet from their right-of-way alone. PG&E's claim that they are justified in removing thousands of trees "within striking distance" of the wires is not backed up by evidence. There are no metrics given to prove this will prevent wildfires or to validate this massive expenditure. This is also a tremendously labor-intensive process, repetitive, unscientific, inconvenient to their customers, environmentally devastating to both plants and wildlife, and frankly, old-fashioned and wrong-headed as hell.*

*The number one thing to focus on is to replace unsafe wire, but this has not been addressed. SCE is replacing 750 miles a year with triple insulated hard steel center wire that can withstand broken branches, as well as animals and balloons and other dangers. In contrast, PG&E is only replacing 200 miles this year with single insulated steel center wires. This is the place to focus on if there is a serious intention to solve this problem instead of allowing PG&E to decide how little they can get away with doing. PG&E stated that it would be 10 years before they can stop PSPS, but at this slow rate of replacement, it will be more like 20, if not more. It's time to stop allowing this utility to set their own inadequate standards that got us into this situation.*

*There are at least 2700 miles of unsafe wire in high risk Tier 2 and 3 areas of PG&E territory. They should replace this within 3 years (not 20) if there is sincere intention to reduce PSPS events, reduce utility caused wildfire and to save lives. In addition, the inflated costs that PG&E quotes per mile should be challenged.*

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*Ultimately, the CA Public Utilities Commission (CPUC) needs to update the inadequate General Orders — improving these regulatory codes to adequately guide the utilities. The Commission has full power to address the defects and omissions in their General Orders, specifically the complete absence of any mention of computerized circuit breakers. Most importantly, Wildfire Mitigation Plans should move forward upon the initiative of the Commission and its engineering staff, rather than allowing utilities to set their own regulations. The goal is to dramatically improve the fire and electrocution safety performance of all utilities operating in California. SB 901 did not obstruct the Commission’s authority.*

*PG&E has 22,000 miles of antiquated, unsafe bare 6-gauge wire, and General order 95 still allows this. It is time to take this inadequate wire out of the code, so it’s no longer legal to use it. The Office of Safety Advocate (OSA) had clearly stated this in the past, but was ignored. . Now, the OSA has now been disbanded and all its valuable safety recommendations disregarded. The new Wildfire Safety Division has taken over the duties of the OSA, but there is no sign that its valuable analyses and recommendations were used as guidelines by the utilities, or that the information is being used by the CPUC, so the WSD should be urged to recommend that it be so.*

*Only the most robust agenda of replacing unsafe conductor, and installing computerized protective relays, will make California utilities fire-safe and we await the WSD to come forward with those kind of recommendations.*

*Thank you for your consideration,*

*{Your name and organization}*

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### **Background from our post on 8/23/19 against allowing tree clearing by the Forest Service:**

*(<https://www.hcn.org/articles/congress-tries-to-speed-up-contentious-post-fire-logging>):*

*“...The third-largest wildfire in California history, 2013’s Rim Fire, burned more than 400 square miles, including parts of Yosemite National Park and the Stanislaus National Forest. A year later, the Forest Service proposed cutting down the dead and damaged trees across about 50 square miles, but environmental groups sued to stop the salvage logging, saying it would harm wildlife and impede forest regeneration. Their appeal was denied and logging began (<http://www.californiachaparral.com/fire/postfireenvironment.html>), but the groups’ concerns are increasingly borne out by science: Recently-released studies point to the crucial importance of burned-over habitat for many species, including the Pacific fisher and black-backed woodpecker....Despite this, Congressional Republicans (pushed) two bills (that year), supported by the timber industry, that would speed up logging in national forests after wildfires and reduce environmental review...The bills’ supporters say that cutting burned trees soon after a wildfire reduces fuel for future fires, and allows the Forest Service to recoup some of the trees’ value as timber. They continuously, and wrongly (<https://www.npr.org/2018/11/28/671572816/fast-tracking-logging-on-federal-lands-may-not-lessen-wildfire-risk>), blame reductions in commercial logging for increased fire risk...*



*...But researchers are finding that commercial logging and clearcutting may actually increase damage from future fires.*

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*In the Rim Fire and other large fires, the areas that burned least intensely were those that had been protected from logging, in which big, mature thick-barked trees more readily withstood the heat of the flames. Young, recently-planted trees and debris from logging operations proved highly flammable. The ecological importance of large mixed-intensity fires is clear — they help produce a mosaic of habitat types, and patches that burn at high intensity, where most or all of the trees are killed, become “snag forests,” one of the rarest but most ecologically vital habitat types, says Chad Hanson, director of the John Muir Project, a nonprofit group that opposes salvage logging.” ...Salvage logging shortcircuits the post-fire rejuvenation process, many studies show, removing the snags and downed trees that create shade and shelter.*

*(<https://www.latimes.com/local/california/la-me-rim-fire-restoration-20180718-story.html>) Heavy machinery can destroy regenerating conifers and other plant life and create erosion, while herbicides prevent the growth of beneficial shrubs and forbs (a herbaceous flowering plant that is not a grass, sedge, or rush. Hanson describes it as “kicking the forest when it’s down.” Read more here. Also see ‘The Myth of “Catastrophic” Wildfire’ ([http://www.sequoiaforestkeeper.org/pdfs/Science\\_papers/Hanson\\_2010\\_myth\\_of\\_catastrophic\\_wildfire.pdf](http://www.sequoiaforestkeeper.org/pdfs/Science_papers/Hanson_2010_myth_of_catastrophic_wildfire.pdf)) and “The Big Lie: Logging and Forest Fires” (<http://westgatehouse.com/art6.html>) by Chad Hanson.*



*Update 8/9/19: After a telephone interview with Chad Hanson of the John Muir Project (<http://johnmuirproject.org>) regarding the role logging played in the ferocity of the Camp Fire, he has sent additional information, which we’re attaching here.*

*Camp Fire Photo Report: (<https://indivisibleventura.files.wordpress.com/2019/08/camp-fire-photo-report-jmp-dec2018.pdf>). (Photo below contained in report)*

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Camp fire, showing devastation of homes in the Kilcrease Circle community of Paradise, a contrast to the green mature forest, with little or no scorching, which surrounds this neighborhood. The homes here were not burned by high-intensity crown fire, but rather were burned when embers driven on the winds landed on flammable homes followed by home-to-home ignitions. Courtesy Satellite image ©2018 DigitalGlobe, a Maxar company/Handout via REUTERS, Nov. 17, 2018.

- *“The Myth of “Overgrown” Forests*  
(2018) (<https://indivisibleventura.files.wordpress.com/2019/08/fact-sheet-myth-of-overgrown-forests-june2018.pdf>)
- *“Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? (2016)* (<https://indivisibleventura.files.wordpress.com/2019/08/fire-bradley-et-al-2016.pdf>)
- *“Common Myths about Forest and Fire”*  
(2019) (<https://indivisibleventura.files.wordpress.com/2019/08/jmp-fact-sheet-forestfire-myths-17feb19.pdf>)
- *“We Cannot Effectively Fight Climate Change Without Increasing Forest Protection”*  
(2019) (<https://indivisibleventura.files.wordpress.com/2019/08/jmp-fact-sheet-forestsclimate-17feb19.pdf>)
- *Dead Trees (“Snags”) Do Not Make Forests Burn More Intensely (2017)*  
(<https://indivisibleventura.files.wordpress.com/2019/08/jmp-fact-sheet-on-snagsfire-10oct17-.pdf>)