

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF  
CALIFORNIA

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

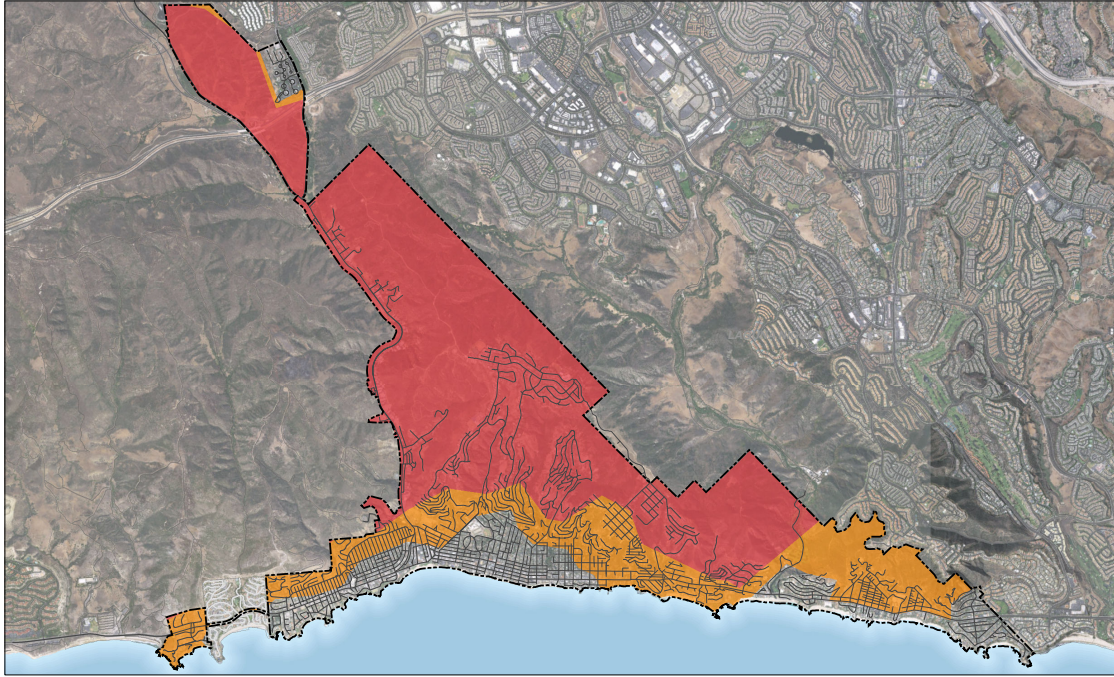
R.15-05-006 (Filed May 7, 2015)


OPENING COMMENTS OF THE CITY OF LAGUNA BEACH ON THE SAFETY  
AND ENFORCEMENT DIVISION'S REPORT FILED ON BEHALF OF THE  
CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION AND THE  
INDEPENDENT REVIEW TEAM

II. THE AREAS OF LAGUNA BEACH CLASSIFIED AS TIER 2 SHOULD BE  
EXPANDED

The City of Laguna Beach strongly disagrees with the classification of the “Tier 2” boundary in the City. Attached to these Comments as Exhibit A is an overlay of Tiers 2 and 3 on the City boundaries and immediate vicinity, and it is clear from reviewing this map that key portions of the City—even those with extremely limited egress in case of fire—were not included in either Tier. The City’s position is that the boundary for the current “Tier 2” should be extended west to North and South Coast Highway from the north City limits to approximately Diamond Street. The City appealed this classification to both the PDP and the Independent Review Team (“IRT”) without success.

According to the IRT Report, Tier 2 areas are those of “elevated risk (including likelihood and potential impacts of occurrence) from wildfires associated with overhead utility powerlines or overhead utility powerlines.”<sup>1</sup> The City’s special local conditions, which it believes have been ignored during the process, require a revision to the Fire Map.



 **Tier 2 & 3 = 4,803 Acres**