



Managing Wildfire Risks

In recent years, California has witnessed several of the largest, most deadly, and most destructive wildfires in the State's history. Northern California Power Agency's (NCPA) 16 members are committed to providing safe, reliable, and affordable electric service to their communities. Our members are diligently working to adapt their practices to the changing conditions of our climate, and are committed to partnering with federal, state, and local agencies to develop solutions addressing this important issue.

Wildfires Demand Federal Action

Wildfires have become a disturbingly common and disastrous occurrence in California. Last year's wildfires were the largest and most damaging in history, with a tremendous toll on human life, property, and economic prosperity. Given California's laws on utility liability, wildfires create a unique challenge for the State's electric utilities. As a result of wildfire liabilities, PG&E has filed for bankruptcy, and public power systems in Southern California have experienced bond rating downgrades due to wildfire risk. Efforts are needed at both the state and federal level to reduce fire risk and improve resiliency.

Wildfires Undermine Carbon Reduction Activities

Greenhouse gas emissions from wildfires have undermined the significant efforts and resources that the electric utility industry, and the economy as a whole, have put into reducing greenhouse gas emissions.

For perspective, analysis from the U.S. Geological Survey indicates that the 2018 California wildfire season resulted in approximately 68 million metric tons of carbon emissions, which is roughly similar to the total

emissions from the electric generation sector for powering the entire state. According to CAL FIRE's Forest Carbon Plan, carbon emissions from wildfires are expected to increase absent changes to forest management practices.

Furthermore, wildfires produce hundreds of thousands of fire-ravaged acres of runoff each year, with the sediment from the fires finding its way into the various reservoirs that make up California's extensive system of hydroelectric resources. This can pose operational and safety risks to dams and reduce carbon-free hydroelectric generating capacity that provides critical operational flexibility to a grid that is increasingly more reliant on intermittent renewable resources such as solar and wind.

Without question, these fires set back significant efforts and resources utilities have put into reducing carbon in the state. The intensity and frequency of wildfires are only getting worse: in the absence of needed thinning and removal of underbrush, forests that historically hosted 50 to 60 trees per acre can now average 350 trees per acre—creating dangerously high fuel accumulations. This is a critical challenge that warrants immediate action.

New Vegetation Management Regulations Must be Finalized

As part of the Fiscal Year 2018 Omnibus Appropriations Act, Congress adopted provisions facilitating tree trimming and removal of trees near transmission and distribution lines located on or near rights-of-way on federal lands. For years, utilities have expressed serious concerns about inconsistent policies, delays in issuing permits to remove dangerous trees, and unacceptable wildfire risks resulting from an inefficient and ineffective vegetation management process.

The new vegetation management provisions standardize the process among federal land managers, allow simplified permitting, and shield utilities from liability when they have identified trees that are fire threats within or adjacent to the rights-of-way but are not ultimately authorized to remove those trees.

Regrettably, the U.S. Forest Service and Bureau of Land Management still has not finalized the new regulations needed to implement this law. With the fire season only months away, prompt action is needed.

Categorical Exclusions will Lead to Better Forest Management Practices

The risk of catastrophic wildfires is greatly increased by the abundance of fuels. Clearing underbrush, dead and dying trees, and thinning trees where necessary can vastly decrease the risk of uncontrolled wildfires. However, the federal regulatory process for reviewing forest management actions is overly cumbersome and time-consuming.

Thoughtful use of categorical exclusions could help reduce the frequency and severity of wildfires. By providing the tools necessary to expedite timber salvage operations in response to wildfires, insect and disease infestations, and other disturbances, federal land managers can more effectively reduce the risk of wildfire, utilize forest materials damaged as a result of those events, and better allocate resources to support restoration activities.

NCPA supports providing categorical exclusions on federal lands to harvest dead, dying, or damaged trees and proactive fuel management including the use of fuel breaks. These changes are necessary to help reduce fire risk, improve forest health, minimize after-fire impacts, prevent re-burn of fire impacted areas, and improve safety for firefighters.