Support Efforts to Reduce 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.

As local government entities, NCPA members are uniquely positioned to coordinate closely with other city departments on emergency planning and response. Through public review processes, NCPA and our members have prepared wildfire mitigation plans that promote safety and reduce the risk of fires near electrical utility infrastructure. NCPA offers its members a venue for sharing best practices related to wildfire mitigation and response and discussing lessons learned. From evaluating opportunities to harden utility infrastructure in fire-prone areas, to increasing investments in vegetation management, NCPA members continue to make operational and maintenance decisions with a focus on public safety and reliability.

Wildfire Mitigation Demands Federal Action

Forest fires have become a disturbingly common and disastrous occurrence in California. Recently, wildfires in the state 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 California have experienced bond rating downgrades and financial challenges. Efforts are needed at both the state and federal levels to reduce wildfire risk and improve resiliency.

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 complained 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 help shield utilities from liability when they have identified trees that are fire threats within or adjacent to the rights-of-way but are not authorized by the federal land agency to remove those trees.

NCPA applauds the Bureau of Land Management for finalizing their regulations and the U.S. Forest Service for issuing its proposed rulemaking in

September 2019 and encourages the agency to adopt a final rule that aligns with the spirit and intent of the underlying law.

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 estimates 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.

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 problem poses operational and safety risks to the dams and reduces the 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 the significant efforts and resources utilities (and California's electricity consumers) have already 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 now average 350 trees per acre—creating dangerously high fuel accumulations.

Proactive Forest Management will Lead to Healthier Forest Practices

The risk of catastrophic wildfires is greatly increased by the lack of tools and resources available to the U.S. Forest Service. Clearing underbrush, removing dead and dying trees, and thinning trees where necessary can vastly decrease the risk of uncontrolled wildfires. Regrettably, the federal regulatory process for reviewing forest management actions is overly cumbersome and time-consuming.

Efforts to fell the 150 million dead trees in California at a rate of 1% per year is unacceptable. 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 expanding categorical exclusions under the National Environmental Policy Act on federal lands to harvest dead, dying, or hazardous trees and foster proactive fuel management including the use of thinning, fuel breaks, and prescribed burns. NCPA also supports H.R. 5774, the CLEAR Zones Act, which would expand the area around rights-of-ways for vegetation management activities. These changes are much needed to help reduce fire risk, improve forest and public health, and improve safety for firefighters.