Support Efforts to Reduce Wildfire Risks

California and the West continue to experience some of the largest, most deadly, and most destructive wildfires in 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 efforts. 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. 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. As well, complimentary federal actions are needed to reduce wildfire risks, improve the resiliency of critical infrastructure, and address the consequences of severe weather events.

Wildfire Mitigation Demands Federal Action

Forest fires have become a disturbingly common and disastrous occurrence in California. The increased frequency and intensity of wildfires that threaten lives and property have prompted dangerous and disruptive anticipatory power shutoffs to reduce wildfire risks and continue to undermine greenhouse gas reduction efforts. Senator Dianne Feinstein (D-CA) and Representative Doug LaMalfa (R-CA) introduced bipartisan legislation last Congress, the *Emergency Wildfire and Public Safety Act*, to help protect communities from catastrophic wildfires by implementing critical wildfire mitigation projects, sustaining healthier forests that are more resilient to climate change, and providing important energy and retrofitting assistance to businesses and residences to mitigate future risks from wildfire and power shutoffs. As well, Senators Wyden (D-OR) and Merkley (D-OR) recently introduced the *Wildfire Resilient Power Grid Act of 2020*, to provide incentives to electric utilities to reduce the risk of wildfires through power system upgrades such as the undergrounding of power lines, fire safety equipment installation, and proper vegetation management. The legislation authorizes $1 billion per year in Department of Energy matching grants, including prioritized funding to consumer-owned utilities that operate in and abut forested areas to reduce the risk of power-line-initiated wildfires. In addition, Representative LaMalfa has sponsored the *CLEAR Zones Act*, which would expand the area around rights-of-ways for vegetation management activities.

NCPA encourages Congress pass the Emergency Wildfire and Public Safety Act, the Wildfire Resilient Power Grid Act, and the CLEAR Zones Act to minimize the occurrence and consequences of wildfires.

Accelerated Sediment Buildup at McKay's Point Reservoir

NCPA operates the North Fork Stanislaus River Hydroelectric Development Project (FERC Project No. 2409) on the North Fork of the Stanislaus River in Alpine, Calaveras, and Tuolumne Counties.

The Project, which has the capacity to generate 256 megawatts of power, includes the McKay's Point Reservoir and Dam. During construction, NCPA worked with the U.S. Forest Service (USFS) to obtain Special Use Permits (SUP) for two sites to relocate the excavated sediment.

When the reservoir was first completed in 1989, original sedimentation buildup rate estimates between 1989 and 2018 were projected to be 43,560 cubic yards. However, the effects of climate change have led to an increased frequency of extreme weather events including floods, droughts, and wildfires leading to greater rates of erosion within the surrounding landscape that eventually flows into hydroelectric reservoirs. As a result, debris flows *from USFS land* in 2018 amounted to 519,040 cubic yards—nearly *12 times* greater than expected. This sediment buildup has degraded the water quality, accelerated the wear and tear of the turbines, and reduced overall power output to nine NCPA member communities served by the project.

To ensure proper project operations, a solution is needed to remove the debris that has flowed into this reservoir from federal lands through landslides and erosion. Preliminary estimates put the cost of removing, hauling, and disposing *half* of the sediment on private lands at $80 million. As well, these costs do not account for the economic impact of the loss in power generation from the facility or the environmental impacts caused by removing the sediment.

Given the likelihood of more frequent extreme weather events in the future and the high price tag associated with removing and disposing of sediment building in hydroelectric reservoirs – federal policies must be reformed and streamlined in a way that adapts this new norm and reduces the financial burden on public power communities.

NCPA's preference is to relocate the sediment to surrounding U.S. Forest Service lands. Revisions to USFS Special Use Permit requirements cast doubt on the ability of NCPA to dispose of the sediment on federal lands—even if the sediment were to be used for beneficial purposes like road supplementation and fire breaks.

NCPA has made progress with the USFS, with the assistance of USFS headquarters and delegation efforts. We have filed for a SUP and are hopeful it will be approved. We will continue to keep the delegation informed if further assistance is needed.