



## Addressing the Ongoing Impacts of Climate Change

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*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's) 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 to prevent and mitigate the impacts of wildfires.*

As many NCPA members are local government entities, they 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 electric 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 proactive operational and maintenance decisions with a focus on public safety and reliability.

In addition to ongoing local and state efforts, complementary federal actions are needed to reduce wildfire risks and improve the resiliency of critical infrastructure.

### **Wildfire Mitigation Requires More Federal Action**

Several important measures have been introduced in Congress to reduce the risk of wildfires and to mitigate their impacts.

For example, 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 initiating critical wildfire mitigation projects and sustaining healthier forests which are more resilient to climate change.

As well, the infrastructure Investments and Jobs Act includes the *Wildfire Resilient Power Grid Act of 2020*, introduced by Senators Wyden (D-OR) and Merkley (D-OR), 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 for such projects, including prioritized funding to consumer-owned utilities that operate in and adjacent to forested areas to reduce the risk of power-line-initiated wildfires.

In addition, Representative Doug LaMalfa (R-CA) last Congress introduced the *CLEAR Zones Act*, which would expand the area around rights-of-ways to allow for more robust vegetation management activities.

*NCPA encourages Congress to support the enactment of federal legislation, such as the measures outlined above, to provide much-needed financial resources, streamlined processes, and other policy changes that can facilitate adaptation to the ongoing impacts of climate change, and effectively minimize the occurrence and impacts 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. During construction of this project, NCPA worked with the U.S. Forest Service (USFS) to obtain Special Use Permits for two sites to relocate the excavated sediment onto adjacent federal land.

When the reservoir was 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 anticipated. This sediment buildup has limited the reservoir's water storage capability, degraded the water quality, and reduced overall

generation of a clean and renewable resource that plays a key role in advancing the state's clean energy and climate goals. The McKay's project is not alone—these effects of climate change are impacting reservoirs across the West.

In light of the rapidly increasing accumulation of sediment, it is imperative that the non-toxic debris in the reservoir be removed, and a location for placement of the sediment be identified. 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 air quality impacts caused by transporting 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 that is rapidly depositing into hydroelectric reservoirs, federal permitting processes must be reformed to recognize and reflect the time-sensitive climate adaptation challenges this presents.

From both an environmental and cost standpoint, redepositing the eroded debris that came into our project from federal land back onto the same adjacent federal land, is by far the most workable and timely solution. Yet, revisions to USFS Special Use Permit requirements cast doubt on the ability of NCPA and other hydropower operators to relocate this non-contaminated sediment back onto federal lands—even if the sediment were to be used for beneficial purposes like road supplementation and fire breaks.

Regrettably, after an extensive consultation process related to McKay's Reservoir, the USFS still has not provide a Special Use Permit for relocation of sediment on USFS lands for beneficial use. The process has proven to be time-consuming, inconclusive, and unworkable. Most importantly, the review process fails to account for the growing challenges that climate change is presenting for hydropower operators throughout the western states.

*NCPA urges Congress and the Administration to consider reforms of the Special Use Permit process for sediment removal in order to reduce the risk of lost electric generation, assure needed water storage, and adapt to the impacts of the changing climate around us.*