



February 2, 2024

**United States Department of Agriculture,
United States Forest Service -
Pacific Northwest Region
1220 SW Third Ave
Portland, OR 97204**

Re: Investor-Owned Utilities' Comments on Northwest Forest Plan Amendment

The undersigned coalition of investor-owned utilities located and operating in Oregon and Washington State greatly appreciate the opportunity to provide comments on the proposed *Northwest Forest Plan* amendment. Avista Corp, Pacific Power, Portland General Electric, and Puget Sound Energy (collectively, the “NW IOUs”) proudly serve over 4 million electric customers in the Pacific Northwest region. The NW IOUs are committed to increasing the use of cleaner renewable energy generation resources throughout the region, with the goal of reducing greenhouse gas emissions and helping lessen the impacts of climate change. At the same time, the NW IOUs must manage the financial impacts to our customers and maintain grid reliability. In light of these goals we seek to provide the following comments to the Northwest Forest Plan (NWFP) Amendment Focus Areas.

Fire resistance and Climate resilience through active management

The Pacific Northwest is not immune to the effects of climate change, which are projected to increase in nature over the next several decades. The Pacific Northwest is already experiencing longer fire seasons.¹ Summers are projected to become drier and warmer and extreme weather events will increase. Changing weather patterns can also intensify tree pests and disease, which has the potential to create additional fire load in both forest lands and wildland urban interface (WUI) communities. Increased development in areas with wildfire risk means that the potential consequences of wildfires on human populations is also likely increasing. Westward expansion, coupled with early, aggressive fire suppression policy and forest management practices, have resulted in almost a century of natural wildfire disruption, allowing for the current dangerous accumulation of fuel. We encourage and support policies that lead to better management of fuel loading and wildfire suppression activities.

As large, regional investor-owned utilities, we continue to develop and update our wildfire mitigation and response strategies with the goal of working to mitigate the risk and potential impacts of severe wildfire

¹ Spies, T. A., Stine, P., Gravenmier, R. A., Long, J. W., & Reilly, M. J. (2018). Volume 1—Synthesis of science to inform land management within the Northwest Forest Plan area. *U.S. Department of Agriculture - Forest Service, 966, 50.*
https://www.fs.fed.us/pnw/pubs/pnw_gtr966_voll.pdf

incidents on electric grid infrastructure throughout our service territories. We understand the risk that severe wildfire poses to our services and to our communities and we strive to work with our federal partners and customers to minimize these risks.

There are thousands of miles of private and public overhead electrical infrastructure located in our shared regional forested lands and crossing through federally managed forests. These facilities are regularly in isolated parts of forest lands. As part of our on-going wildfire mitigation programs, the NW IOUs continue to work to implement preventative measures and technologies specific to wildfire risks for our overhead electrical infrastructure and focus on targeted actions that improve situational awareness and also help to prevent wildfire ignition throughout our service territories. Our wildfire mitigation efforts include infrastructure and equipment ‘hardening’ projects, including targeted undergrounding of facilities, tools and technology to elevate risk analysis and real-time situational awareness, deployment of new wildfire construction standards, and targeted pre-season wildfire patrols, all of which are established methods that work to prevent and minimize the risk of fire. One of the most important and continuous wildfire mitigation tools that the NW IOUs collectively employ (with vocal support from our stakeholders, industry partners, regulatory bodies, and the customers and communities we serve) is active Integrated Vegetation Management.²

Transmission and distribution systems throughout our service territories have undergone detailed wildfire risk analysis and mapping. Information and learnings from these processes are utilized to guide infrastructure and vegetation management investments, as well as improving situational awareness for operational procedures. These vegetation management efforts are intended to reduce the potential for tree contact with energized power lines and help to lower the risk of wildfires. Electric companies such as ours collectively spend hundreds of millions of dollars³ implementing integrated vegetation management programs annually to ensure that vegetation near power lines and other infrastructure is properly maintained and cleared.

We believe any amendments to the NWFP being considered by the U.S. Forest Service (USFS) should take into consideration the vital role that regional utilities, including the NW IOUs, play in the management and protection of forested ecosystems through pro-active wildfire mitigation practices. While reviewing amendments to the NWFP, we believe the USFS should consider the effectiveness of the vegetation management methods commonly utilized by electric utilities and continue to approve issuance of applicable Special Use Permits with workable, common sense Operations and Maintenance Plans in areas where electric utilities have an obligation to actively manage transmission and distribution assets in federal right-of-ways (“ROW”). One such consideration should be the the commercial usage of removed debris for purposes such as biomass generation, biochar production, and biomass fuel production. We also encourage the USFS to consider expanding its permitted use of vegetation management methods such as the strategic use of herbicides for Integrated Vegetation Management purposes.

Transmission and Distribution Line Maintenance and Construction

Western lands involve a complex array of ownerships, including federal, state, local and tribal governments and private landowners. The NW IOUs are responsible for ensuring safe, reliable transmission and distribution systems that often traverse federal forest lands, as noted above. We urge the USFS to recognize

² Integrated Vegetation Management is an industry term that refers to the use of mechanical, chemical, and other methods to control vegetation on the ROW and encourage a low growing plant community in the managed ROW area. Integrated Vegetation Management is primarily used where overhead transmission lines 230kV or greater are located, but may also be applied in 115kV corridors.

³ *Vegetation Management Transformed*. (2021, March). Accenture. Retrieved January 31, 2024, from https://www.accenture.com/us-en/blogs/accenture-utilities-blog/vegetation-management-key-levers-for-cost-savings#_ftn1

utility infrastructure needs in the NWFP, even beyond the wildfire context. Maintenance of existing utility ROW and equipment are critical components of providing safe, resilient, and reliable power. Utilities further need the ability to upgrade and build new power lines to bring cleaner energy resources to load centers, which may necessitate expansion of federally-managed ROW. Additionally, the NW IOUs request increased support of inspection, identification and removal of off-ROW hazard trees on federally managed lands. As we work to implement the clean energy and greenhouse gas reduction goals of Oregon, Washington and the nation, it is important that the USFS and NWFP enable, rather than create new barriers to, the essential upgrades and expansions of the transmission system.

Impacted communities

As development increases and homes are built at the edge and inside of densely forested areas, people and structures are at increased risk of wildfire impacts. Utilities throughout the Pacific Northwest utilize geospatial datasets produced by the USFS Fire Modeling Institute to better understand the relative potential for wildfire throughout our service territories; many communities adjacent to federally managed forests covered by the NWFP are currently experiencing increasing risk of devastating wildfire impacts. In order to continue to work to protect the communities located within the WUI throughout our service territories, we intend to continue a strong coordinated effort with our federal partners that provides utilities the flexibility and support to take proactive utility vegetation management steps to prevent and reduce the likelihood of ignition during dangerous fire weather conditions.

We thank you for the opportunity to provide comments during this initial public scoping period for the Northwest Forest Management Plan Amendment process and look forward to continuing to engage with our federal partners on providing helpful insight and comment for the management of the region's forested lands and the protection and benefit of the communities that are located amongst them.

Sincerely,

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