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First name: John

Last name: Tyler

Organization: Bonneville Power Administration

Title:

Comments: See attached

Department of Energy

Bonneville Power Administration

P.O. Box 3621

Portland, Oregon 97208-3621

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In reply refer to: TFBV-SNOHOMISH

Submitted via:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>

RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National

Forest System #65356 (Due 2/2/24); AND

Region 5 and Region 6; California, Oregon, and Washington; Forest Plan Amendment for

Planning and Management of Northwest Forests Within the Range of the Northern

Spotted Owl #64745 (Due 2/1/24).

The Bonneville Power Administration (BPA), U.S. Department of Energy, respectfully submits comments to the Forest Service (FS) on the proposals for "Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System" and "Region 5 and Region 6; California, Oregon, and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl." These will hereinafter be

referred to as the "Old-Growth Notices." BPA understands that the FS will be coordinating these plan development proposals. It files these combined comments to facilitate that coordination.

Role of BPA in the Pacific Northwest

BPA is a federal agency and one of four public power marketing administrations with the U.S. Department of Energy. BPA delivers reliable, affordable, and carbon-free hydropower produced in the Columbia River Basin to communities across the Northwest. BPA is an engine of the Northwest's economic prosperity and environmental sustainability. Today, nearly 3 million people and more than 1.2 million jobs depend on BPA power.

BPA operates and maintains about 15,000 miles of high-voltage transmission in its service territory. BPA's territory includes Idaho, Oregon, Washington, western Montana and small parts of eastern Montana, California, Nevada, Utah, and Wyoming. BPA has over 1,500 circuit miles of transmission on NFS, many of which cross multiple forests. It also has an extensive access road network on NFS land.

Congress authorized BPA to construct, operate and maintain transmission lines in the Pacific Northwest pursuant to the Bonneville Project Act, 16 USC [sect]832 et seq., the Federal Columbia River Transmission System Act, 16 USC [sect] 838 et seq, the Department of Energy Reorganization Act, 42 USC [sect]7152 and the Pacific Northwest Electric Power Planning and Conservation Act, 16 USC [sect]839 et seq.

BPA has over 120 special use authorizations that allow it to construct, operate and maintain transmission lines on the NFS along linear rights-of-way (ROW). These authorizations were initially issued to BPA as a federal agency under various Memoranda of Understanding between

our two federal agencies. All the authorizations allow BPA to manage vegetation and operate and maintain infrastructure in and adjacent to these ROWs.

BPA uses cost effective methods to proactively manage vegetation and to establish low-growing plant communities along the ROW to minimize the development of potentially threatening or incompatible vegetation. The goal of vegetation clearing in BPA ROWs is to manage vegetation that supports transmission reliability and reduces wildfire risks while also adhering to BPA's commitment to environmental stewardship.

As a federal agency, BPA conducts environmental and cultural compliance for all projects, including on NFS lands. BPA has a vegetation management program that is cost-effective, sensitive to environmental and cultural concerns, responsive to public and agency comment, and consistent with integrated vegetation management strategies. BPA uses programmatic guidance for site-specific vegetation management projects, outlined in its Vegetation Management Final Environmental Impact Statement.

For over 80 years, BPA has worked in partnership with the FS. It looks forward to working together on Strengthening the Nation's Forests, Communities and Local Economies as the President outlined in Executive Order 14072.

Very Substantial BPA Footprint on NFS lands that are or could be covered by amending existing plans or providing new designations for Old-Growth and mature forests.

BPA has transmission lines in ten Northwest Forest Plan (NWFP) forests, nine in Region 6, as well as lines in one NWFP forest in Region 5. BPA Lines are present in the following NWFP

forests: (1) Deschutes National Forest, (2) Fremont-Winema National Forest, (3) Gifford Pinchot National Forest, (4) Mt. Baker-Snoqualmie National Forest, (5) Mt. Hood National Forest, (6) Okanogan-Wenatchee National Forest, (7) Olympic National Forest, (8) Siuslaw National Forest; (9) Willamette National Forest, and (10) Modoc National Forest [Region 5]. The FS has noticed that these same 10 NWFP forests will be covered by the nationwide Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System as well.

In addition to the ten NWFP Forests, BPA has transmission lines in 13 other Forests within the BPA service area including: Region 1- Beaverhead-Deerlodge, Custer-Gallatin, Flathead, Idaho Panhandle, Kootenai, Lolo, Nez Perce-Clearwater; Region 4 - Boise, Bridger-Teton, Targhee; Region 6 - Colville, Ochoco, Wallowa-Whitman.

BPA and the FS are aligned on many of the objectives stated in the Old Growth notices, particularly those focused on reducing wildfires. BPA has implemented a wildfire mitigation plan to reduce wildfire risk associated with BPA transmission lines is in ongoing discussions with several forests to identify ways in which we can partner to reduce risk thereby benefiting old growth and the federal transmission system.

Summary of BPA's Comments and Recommendations

First Recommendation: It is important that the FS does not impede a transmission owner's ability to maintain transmission infrastructure on transmission lines and manage vegetation within and adjacent to transmission line ROWs (hereinafter "transmission line management" or TLM). It is in the public interest that these transmission systems and the vegetation near them are properly and timely managed as this reduces the risk of the lines becoming a source of wildfire ignition. It also assures the reliability of the transmission system given it provides

essential electric service to the FS and the communities who depend on it.

BPA's ROW permits, many of them issued by the FS years before the existence of land management plans, specifically authorize BPA to manage its transmission line corridors. Additionally, Congress enhanced federal law, in Section 512 of Federal Land Policy and Management Act (FLPMA), which directed the FS to assure owners of electric or powerline facilities, which includes transmission lines and accompanying infrastructure, can maintain, and manage these ROWs. Congress found this transmission line management is not only critical to reducing wildfire risks but also to assuring the reliability of the electric grid.

Thus, any new Old-Growth management objectives, management areas, standards or guidelines should account for and protect BPA's current authorizations and the congressionally mandated transmission line management objectives. It would be counterproductive for the FS to limit the ability to manage transmission lines as this could well increase wildfire ignition risks.

Second Recommendation: Second, as the FS works to protect and increase old-growth characteristics in designated areas, it should exclude transmission line corridors including the ability to manage vegetation on and off ROW, from existing or new old-growth management areas. This recommendation would respect the existing rights and the FLPMA Section 512 mandates. Alternatively, the FS could create exceptions from standards and guidelines for the transmission corridors in its Old-Growth planning amendments. As the FS amends planning regulations and individual Forest Plans, transmission corridors should be added to the plans as they are frequently not even mentioned. BPAs transmission lines clearly represent a federal infrastructure investment and contribution to the social and economic conditions in the forests and the NW region.

These approaches would also enable both agencies to achieve the country's renewable energy objectives outlined in EO 14057. These objectives cannot be achieved without a transmission grid; a grid that needs to be maintained, rebuilt, reconductored, upgraded or otherwise enhanced to enable the country to reach renewable energy goals. The EO requires a whole of government approach to innovate the increased delivery of electricity while respecting environmental stewardship.

Third Recommendation: Third, the FS could consider implementing risk management strategies using proactive standards and guidelines for areas where powerlines are located by adopting new ways to reduce ignition risks from tall trees falling in powerline ROWs. History shows that trees falling into powerlines often pose a substantial risk of wildfires. To manage that risk the FS should consider adopting a "limited tree height buffer zone" strategy next to transmission line ROWs, specifically designed to prevent trees from falling into the line. If the FS would manage trees that can fall into the line by removing or topping them, especially in high fire risk zones, then wildfire risks would be significantly reduced. If there are no trees that could strike the line, then BPA could potentially avoid de-energizing the line in extreme weather events. This is a place based adaptive strategy in addition to the FLPMA Section 512 tools utilities already have to remove hazard trees where there is existing identified structural tree defect, or disease or insect caused condition that a qualified utility tree specialist can observe.

Finally, EO 14057 directs that agencies should "safeguard Federal investments against the effects of climate change." BPA has made a substantial investment in federal infrastructure to deliver electricity to the Pacific NW region as Congress directed it to do; those investments are best protected by reducing wildfires ignition risks. BPA's wildfire reduction efforts compliment the FS's actions to address climate effects on wildfire risks and making old-growth forests more

fire resilient.

In summary, BPA believes its three recommendations are consistent with the proposed objectives in Old-Growth Comment Notices because they:

- 1) Reduce climate amplified stressors such as wildfires;
- 2) Use geographically informed adaptive implementation strategies (proximity to powerlines and adopt mature species height from the units/areas); and
- 3) Adopt strategic conservation and proactive stewardship strategies and use intentional management tools near powerlines that enhance forest resiliency and adaptability to stressors.

Request Modifications to Forest Service Proposals

BPA respectfully requests the FS modify its proposals to enable considerations of BPA's recommendations in both proposed Environmental Impact Statements (EIS) for the Old Growth Notices:

- (a) Broaden the Purpose and Need statements so that the FS can consider management strategies that reduce wildfire ignition risk from powerlines to protect old growth forests;
- (b) Assure the effects analysis includes how each action alternative would impact transmission lines; specifically, the ability to maintain transmission line ROWs and respond to wildfire events;
- (c) Analyze more criteria in the Planning Rule (36 CFR [sect][sect] 219.8 to 219.11) for both Old-Growth proposals; and

(d) Amend the proposed standards to create a proactive stewardship strategy that enables transmission line management to reduce wildfire ignition risks or adds an exception that achieves the same result.

The details for these modifications are outlined below. BPA has also provided additional information for context and consideration.

Detailed Comments

A. Honor Congressional and regulatory mandates to allow vegetation management (VM) practices to maintain on and/off ROW hazard trees near powerlines and infrastructure (TLM).

1. Congressional mandate in FLPMA Section 512

In 2018, Congress amended the FLPMA, 43 USC [sect] 1772 (Section 512), to respond to the utility industry's concerns that they were not able to effectively and timely manage emergency and nonemergency routine vegetation maintenance on powerlines as well as conduct needed infrastructure maintenance. Section 512 expressly provided the utilities with the ability to manage hazard trees on and off powerline ROWs if the owners have an Operating Plan that covers these activities, and they are conducted in an environmentally compliant fashion by adhering to all applicable federal, state, and local environmental laws.

Congress adopted Section 512:

To enhance the reliability of the electric grid and reduce the threat of wildfire damage to,

and wildfire caused by vegetation-related conditions within, electric transmission and distribution rights-of-way and abutting Federal land, including hazard trees[hellip]

Hazard trees are defined in 43 USC [sect]1772(a)(1); 36 CFR 251.51 (Definitions) and Powerline Forest Service Regulations and Directives, FSH 2709.11, Chapter 80.

Congress provided that these TLM rights were extended to any rights-of-way "regardless of the means by which the rights-of-way are established (including by grant, special use authorization, and easement)." See 43 USC [sect]1772.

This TLM authority should not be compromised by the Old-Growth proposals as it would seriously impede the work utilities do to reduce wildfire risks along linear powerline ROWs. If new guidelines or standards create constraints on these utility management activities in or adjacent to powerlines, it could increase the very wildfire risk the FS seeks to reduce. It could also have potentially substantial adverse effects to the reliability of these powerlines.

The FS clearly stated in its initial inventory that mortality from wildfires is the leading threat to mature and old-growth forest conditions. BPA offers ways for the FS to accommodate both the congressional VM powerline mandate along linear powerline ROWs and to simultaneously protect the old-growth and mature forests by improving fire resilience and climate adaptability while better supporting and protecting the communities' social and economic conditions. Access to reliable power is essential for economies of rural communities.

2. Reliability and Other Safety and Health Mandates

The Federal Energy Regulatory Commission (FERC) is a government agency that oversees the interconnected electricity grid in the United States. FERC's reliability jurisdiction is primarily over what is known as the "bulk power system." To maintain the reliability of the bulk power system, FERC reviews, approves, and enforces mandatory reliability standards developed by an organization called the North American Electric Reliability Corporation (NERC). See 16 U.S. Code [sect] 824o.

Grid reliability is the provision of an adequate, secure, and stable flow of electricity as consumers may need it. In other words, when you flip the light switch, the lights turn on. The NERC reliability standards require owners of transmission lines to have a vegetation management program to assure that trees do not interfere with or fall into transmission lines, historically a major cause of cascading blackouts. BPA is not only subject to utility reliability standards issued by FERC, NERC, and, as applicable, the regional entity designated by NERC (e.g., the Western Electricity Coordination Council (WECC)) but also other standards, including the National Electrical Safety Code (NESC) and standards issued by the Occupational Safety and Health Administration (OSHA) and the American National Standards Institute (ANSI). It notes this to make sure the FS recognizes the complex regulatory scheme BPA needs to follow to operate and maintain powerlines on all ROWs on all types of land its lines cross.

B. Scope the Purpose and Need Statement in the EIS to recognize benefits of Powerlines to Communities and Local and Regional Economies and Acknowledge the Critical Vegetation and Infrastructure Management Necessary to Maintain Powerlines to Prevent Wildfires

BPA asks the FS to recognize the existence of the transmission line and corridor protections as one of the stewardship purposes in the Old-Growth planning proposed standards and guidelines.

This would assure the FS specifically allows for the management of the land to accommodate the operation and maintenance of these approved uses. Given the need to reduce wildfire risks is the key driver in the Old-Growth proposals and wildfire ignition risks rise when powerlines are not maintained, this is a reasonable and prudent adjustment to make to preserve old-growth and mature forests.

1. Recognize and preserve the social and economic benefit of transmission lines

Current forest plans are often decades old. There are minimal references to electrical infrastructure in many of them. Most Forest plans we have reviewed fail to acknowledge or consider the powerline contributions to economic and social conditions. Given the new desired conditions that the Old-Growth proposals are trying to achieve, the Forest Service must modernize the Forest Plan's treatment of powerlines to protect Old-Growth and mature forests.

In fact, the Planning Rule (36 CFR Part 219) and the FS Handbook require that the FS consider how the management of the plan area contributes to social and economic sustainability by contributing to social, cultural, and economic conditions in the area(s) of influence and the broader landscape; this includes managing a set of desired social, cultural, and economic conditions within the plan area including Infrastructure and Renewable Energy.

BPA notes that now there is direct congressional mandate to enhance the reliability of the electric grid and reduce the threat of wildfire damage to, and wildfire caused by vegetation-related conditions within, electric transmission and distribution rights-of-way and abutting Federal land (FLPMA Section 512). Given this mandate for electrical infrastructure needs to be incorporated in the Forest Plans. The plans must address the major economic benefits of

transmission lines to communities to assure that there is a framework to address their linear TLM. Powerlines are critical to maintaining sustainable economies into the future. Transmission lines are not a one and done project - these existing lines represent significant and ongoing investments in the community for decades and need to be there well into the future.

2. Revise Standards for Management Action and its Definition of "Proactive Stewardship" in the Nationwide Old-Growth Proposal

The proposed "standard" is designed "to prevent degradation of old-growth conditions and to enable conservation and proactive stewardship within old-growth forest conditions to foster or increase resilience to disturbances and stressors that may have adverse impacts." To achieve these protections, the proposal sets forth a definition of what constitutes "proactive stewardship."

See 88 Fed Reg 88047.

BPA maintains that this "proactive stewardship" definition needs to be broader, and any standards and guidelines need to recognize increasing stewardship includes allowing VM or and off near powerlines ROWs. Indeed, VM will and should involve removing hazard trees to reduce wildfire ignition risks. It may also mean adopting new linear strategies as discussed in this comment letter in Section C below.

This consistent guidance from the start will assure that FS staff are able to allow for powerline vegetation management in and near powerline ROWS even in Old-Growth and mature forest management areas.

If this type of language is not included, FS staff may believe they have no choice but to impose additional VM management restrictions on powerlines or that they do not have the discretion to

recognize these lines (many of which are not well described or acknowledged in the older plans).

This lack of clarity may well have the unintended consequences of increasing wildfire risks.

Specifically, BPA proposes that the definition of "proactive stewardship" in 88 Fed Reg 88047 be amended as set forth in the bold text below:

2 (a) Vegetation management in old-growth forest conditions must be for the purpose of proactive stewardship, to promote the composition, structure, pattern, or ecological processes necessary for the old-growth forest conditions to be resilient and adaptable to stressors and likely future environments. Proactive stewardship activities shall promote one or more of the following:

Add New Subparagraph # - reduction of wildfire ignition risks by allowing infrastructure maintenance and vegetation management in and adjacent to powerlines;

Alternatively, if the FS believes the drafting of the Standards requires this powerline VM activities be considered an exception in Paragraph 2(b) in 88 Fed Reg 88047, it should be expressly called out as such as this is too important to leave to interpretation which would undoubtedly be inconsistently applied across the country. Alternatively, BPA would propose the following be added to 2(b):

(b)(#) to reduce wildfire ignition risks by allowing vegetation management and infrastructure maintenance in and adjacent to powerlines.

3. Adopt Additional Planning Rule Criteria in the Proposed Revisions to NWFP Proposal

BPA suggests the NWFP Amendment Focus Areas include in the Scoping and Effects document how changes to the plan would beneficially or adversely impact transmission lines. BPA also suggests that the background section acknowledge the social and economic contributions of transmission lines and the relatively new requirements of FLPMA Section 512 which achieves many of the same objectives listed in the focus areas. The NWFP Focus Area analysis should include analysis and review on:

- 1) Adopting proactive vegetation management around powerlines and how this would enhance the fire resilience of the NWFP landscape.
- 2) Revising strategies to allow for linear powerline management of on and off hazard trees and vegetation can measurably increase the conservation and resilience of old-growth forests.
- 3) Specifying reliable powerlines are key to the economic viability of sustainable communities and stress social and economic considerations include powerlines which support technology, health care, public safety, communication networks, and business operations.

It is essential that the FS consider BPA and other electric utilities as integral to future planning on wildfire prevention and existing permitted uses. Proactive ROW management to safely deliver power must be respected and not restricted. It is imperative that the industry is included in the landscape planning process. Isolating electric utility planning to individual forests with each line addressed individually as if they are not networked is shortsighted and ineffective.

Specifically, BPA proposes that the FS consider adding and analyzing the following criteria in

Title 36, Section 219:

? 219.10(a)(3) Appropriate placement and sustainable management of infrastructure, such as recreational facilities and transportation and utility corridors.

? 291.10(a)(6) Land status and ownership, use, and access patterns relevant to the plan area.

? 219.10(a)(7) Reasonably foreseeable risks to ecological, social, and economic sustainability.

? 219.10 (a)(8) System drivers, including dominant ecological processes, disturbance regimes, and stressors, such as natural succession, wildland fire, invasive species, and climate change; and the ability of the terrestrial and aquatic ecosystems on the plan area to adapt to change ([sect] 219.8);

? 291.10(b)(2) - Other plan components for integrated resource management to provide for multiple use as necessary.

According to 36 CFR 219.13 (b)(5) on plan amendments, the responsible official is to determine which specific substantive requirement(s) within [sect][sect] 219.8 through 219.11 are directly related to the plan direction being added, modified, or removed by the amendment and apply such requirement(s) within the scope and scale of the amendment. BPA finds there is sufficient evidence that the additional substantive requirements listed above are directly related to the amendment.

The Old-Growth proposals seek to facilitate the development of geographically informed adaptive strategies for old-growth forest conservation, and states that this will be done by consulting with industry partners. Additionally, the Planning Rule requires the FS to consult with utilities with existing powerline permits to address the social, cultural and economic conditions. See FSH 1909.12. BPA stands ready to assist in designing these new old-growth protections in a

manner consistent with federal reliability, electrical and safety laws, and regulations.

C. Assure EIS analyze how the FS could improve/alter its management of forested areas adjacent to powerlines to achieve the EO 14072 objectives.

BPA finds the FS has a unique opportunity to analyze how it can improve its management strategies to proactively address wildfire risks, in particular adjacent to powerlines given the wildfire risks that face Old-Growth forests. The proposal seeks input on how and where these new management standards and guidelines should apply, and which areas should be prioritized.

1. Adopt Tree Height Buffers in Place Based Strategies

BPA asks the FS to consider a new strategy to provide "tree height buffers" (and thus an alternative in the EIS analysis) and develop standards or guidelines that would enable the FS, in partnership with the utilities, to maintain off ROW mature tree species at heights that can't hit the powerlines and thus will avoid wildfire ignition risks from trees falling into powerlines.

BPA asks that the FS acknowledge the potential benefit of "tree height buffers" as a preventative action to reduce wildfire risk. It is a simple straightforward way to avoid ignition risks near powerlines by not letting trees grow to the height that could, if the tree fell, hit the powerline. This buffer could be set using the width of the ROW, height of the predominant tree species along the ROW area and may need to account for the slope and other topographical conditions.

Notably, this tool would be in addition to the hazard tree removal authorization that is provided in FLPMA Section 512 as explained above because it would involve removing trees before they become hazard trees.

This tree height buffer strategy would also have the benefit of:

(i) Avoiding wildfire related emergency vegetation management actions after a tall tree

falls into line which can cause destruction of Old-Growth trees during/after wildfires;

(ii) Minimizing Emergency Response and Post Fire cleanup. Emergency response to

restore power and reliability often requires downing burnt Old-Growth trees resulting

in fuel loading problems BPA can't remove trees in environmentally compliant

manner or recover any value of the timber/economic purposes; and

(iii) Increases system reliability which is especially important during emergency events

when electricity is needed to support emergency response.

2. Avoid Fringe Trees in All Areas Adjacent Transmission Lines - Assure the new standards

or guidelines require that the FS adopt appropriate protections areas adjacent to

transmission lines.

In circumstances where the tree height buffer zone has not been applied, BPA asks the FS to

avoid creating fringe trees adjacent to transmission lines. BPA appreciates the FS's projects

maybe designed to allow mature trees to grow without the interference of smaller trees.

However, if these projects are undertaken adjacent to a powerline ROW, it often presents new

powerline management problems, often associated with fringe trees.

This is because those mature and taller trees near the ROW (which are often tall enough to fall

into the powerline) are not always wind firm or weather worthy. Once they are exposed to these

elements, they can often become hazard trees that need to be removed. If they are not removed, then they present ignition and reliability risks when they fall into the line. This result could be minimized if the FS consulted with utilities on how to avoid this increased tree in the line scenario. BPA would respectfully request that part of this Old-Growth preservation and enhancement strategy recognize this risk and address it in the EIS effects.

C. Additional Information in Support of BPA's Recommendations and Strategies.

The FS should account for the following.

1. Recognize that BPA's Wildfire Mitigation Program and VM Are Consistent with the Old-Growth Proposals

BPA has a Wildfire Mitigation Program and biennially revises its Wildfire Mitigation Plan (WMP) which includes vegetation management (VM) programs and asset management programs across the entire transmission system. <https://www.bpa.gov/-/media/Aep/wildfire/bpa-2022-wildfire-mitigation-plan-20220519.pdf>

BPA's overarching goal is to provide safe, reliable, environmentally sustainable, and affordable electric service to the region. To meet this goal BPA constructs, operates, and maintains its transmission system in a manner that minimizes wildfire risks.

BPA uses data collected and analyzed by various federal agencies to identify and measure the threat of wildfire by location. It also has contracted with the PNNL (Pacific Northwest National Laboratory) to develop more detailed data layers to use to identify risks unique to its service territory. A few of the many variables considered in this analysis are wind, humidity, vegetation

species and fuel volume. It is notable that this is a science-based vegetation treatment which the Old-Growth proposals contemplate.

The WMP addresses BPA's efforts to mitigate the risk of wildfire ignitions through the recognition of this industry wide fire equation. $\text{Fire} = \text{Fuel} + \text{Ignition Source}$.

BPA continues to consider and employ existing and emerging solutions that enhance our operational effectiveness in mitigating wildfire risk. BPA has adopted the Institute of Asset Management's methodologies as its benchmark for asset management. By making asset management an element of BPA's strategic plan it enhances our ability to develop solutions that focus on asset life-cycle management which, in turn, improves risk reducing methodologies in reliability, resiliency, and wildfire mitigation. BPA will continue to assess increasing impacts from climate change, community growth, and its assets' conditions, as its WMP evolves.

BPA's Vegetation Management Program

BPA also has a NERC compliant VM program. BPA's VM program is critical to its WMP. The goal of vegetation clearing in and adjacent to BPA ROWs is to manage vegetation that supports transmission reliability and reduces wildfire risks while also adhering to BPA's commitment to environmental stewardship. The program covers both routine scheduled maintenance of the transmission lines, access roads and other facilities as well as emergency or imminent threat vegetation removal. The program sets clearance distances from any vegetation to the transmission line (a conductor). Since conductors move horizontally and vertically based on dynamics such as operating temperature, wind and loading, clearance is evaluated from all possible conductor positions. Clearance also accounts for vegetation that would grow into, bend

into, swing into or fall into a clearance distance if not removed. BPA works to establish and maintain vegetation with a mature height or growth that is 25 feet from the max sag of the transmission lines.

Whenever possible given weather, environmental restrictions, and logistics of managing 15,000 line miles housed within 8,500 miles of rights-of-way, routine and non-emergency work planned in high fire risk areas will be scheduled during the lowest risk times of the year. When that is not possible, or when urgent, unplanned maintenance needs to occur, BPA is committed to being "fire safe". That means exercising fire safe practices and taking proper wildfire mitigation precautions while it maintains its transmission lines and performs vegetation management actions.

It is imperative that this work be able to continue in and adjacent to powerline ROWs and BPA stands ready to assist the FS in making sure that the proposed amendments to the 128 land management plans and the NWFP amendments compliment and not impede these efforts.

2. Incorporate the effects of prescribed burns in the vicinity of powerlines and partner with utilities PRIOR to planning burns.

The Old-Growth proposals seek to restore prescribed fire in fire-adapted ecosystems. The FS should assure that the plan's proposed standards and guidelines and fire management zones account for and avoid powerline ROWs. When planning prescribed burns, the FS standards and guidelines should call for coordination with the utilities that have nearby transmission line corridors.

BPA stresses that prescribed burns near powerlines can have serious safety consequences for the

public, workers involved in the burns who are unaware of risks of electrical lines and result in outages and line failure due to the fire and associated smoke. Fire, smoke and even heat can act as conductors and cause electrical arcs from transmission line to the ground (similar to lightening). Arcs can jump across the air - so direct contact with a high voltage wire is not required to produce a fatal effect. Smoke is also dangerous to transmission lines, and it can conduct electricity.

See Northwest Wildfire Coordinating Group at <https://www.nwccg.gov/committee/6mfs/power-line-safety#:~:text=All%20personnel%20should%20be%20cautioned,a%20hazard%20due%20to%20induction.>

3. Achieving renewable energy goals - a critical challenge is the maintenance of existing lines and rebuilding/reconducting the grid infrastructure to integrate them successfully and demonstrating how innovation and environmental stewardship can protect our planet and safeguard federal investments.

The EO14057, Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability, recognizes that the Federal Government faces broad exposure to the mounting risks and costs already posed by the climate crisis. In responding to this crisis, the EO states that we have a once-in-a-generation economic opportunity [hellip]. to transform how we build, buy, and manage electricity[hellip]" (emphasis added) The EO ordered a whole of government approach be used to achieve a carbon pollution-free electricity sector by 2035 and net-zero emissions economy-wide by no later than 2050. The government is to "demonstrate how innovation and environmental stewardship can protect our planet, safeguard Federal investments against the effects of climate change, respond to the needs of all of America's communities, and expand American

technologies, industries, and jobs." (emphasis added)

BPA, like many utilities, is seeking to find ways to install new equipment on existing lines that improves the capacity of the line so it can integrate more renewable energy. BPA's Evolving Grid program is an initiative designed to increase the reliability and capacity of the federal transmission system and provide more of the infrastructure necessary for BPA's customers to meet emerging renewable resource portfolio requirements.

BPA is exploring the installation of more sophisticated conductors, hardware, and other transmission materials to increase the capacity of existing transmission corridors. These upgrades are necessary to better integrate renewable energy, another nationwide goal and directive in EO 14057.

E. Preserve regional/forest level review and avoid unnecessary and untimely DC review.

BPA has concerns about the Deputy Chief's Directive to Regional Foresters entitled "Review of Proposed Projects with Management of Old-Growth Forest Conditions" which indicates that foresters shall send all vegetation management actions to DC for approval. This was issued on December 18, 2023.

First, BPA would appreciate the Deputy Chief clarifying if the directive was only intended to address actions the FS is taking to manage vegetation. BPA hopes the directive is not meant to contravene FLPMA Section 512 and existing FS Directives and procedures set forth in approved Operating Plans. Additionally, this would interfere with BPA's current MOU with the FS that provide processes for vegetation management on its powerline facilities.

If, however, the Deputy Chief intends to apply this DC review process to powerline VM actions that are completed under FLPMA Section 512, then BPA is alarmed by the potential adverse impact this could have on our ability to conduct timely and adequate VM for our transmission system.

BPA is concerned that this directive if applicable to utility VM actions could well increase wildfire risks due to delayed review of routine vegetation management. Routine vegetation occurs in cycles of 3 to 6 years generally, missing a cycle poses an undue risk. This vegetation work is often dependent on timing restrictions due to the Endangered Species Act and weather so any delayed review could result in over a year delay in the work getting done. As noted above, transmission lines cross a checkboard of ownership and the inability to maintain the portions that cross the NFS impacts the entire line and its reliability. This deviation from the review and coordination outlined in existing procedures is unnecessary when it comes to powerlines.

Conclusion

BPA appreciates the opportunity to comment on these two notices regarding proposed actions to amend Forest Plans at the nationwide level as well at the NWFP plan level. BPA stresses how critical it is the proposals' effects on transmission lines be assessed in the EIS and that EIS alternatives acknowledge how specialized tools for powerline vegetation management can enhance wildfire protection and reliability.

In summary, BPA believes the FS should retain the status quo for TLM and not adopt additional mandatory constraints in guidelines or standards that interfere with the rights in its existing permits.

Proactive transmission line VM and infrastructure maintenance and upgrades should be considered proactive stewardship to improve forest resilience. Finally, BPA seeks clarity from the FS on how the plan amendments and the December 2023 directive will impact pre-existing special use permit holders. BPA submits these substantive comments for the record and looks forward to commenting on the draft environmental impact statement and draft record of decision.

Please note that BPA is more than willing to engage with FS staff as they proceed on the scoping and EIS development. I can be reached via email at jdt Tyler@bpa.gov or by phone at 503-230-5116. BPA would welcome the opportunity to coordinate with FS further as you complete your NEPA process.

BPA appreciates your review of these comments and looks forward to working with the Forest Service on both the National Old-Growth effort and the NWFP amendments. It encourages the FS to make sure that it effectively coordinates these two efforts given that BPA will be impacted by both.

Sincerely,

John Tyler

Chief Forester, Vegetation Management and Forestry, TFBV

Bonneville Power Administration

ATTACHMENT: Bonneville Power Administration Comments for Old Growth Notices 2.1.2024.pdf is letter content.