

Data Submitted (UTC 11): 3/12/2025 4:00:00 AM

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Comments: Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the November 2024 Northwest Forest Plan (NWFP) Amendment Draft Environmental Impact Statement (EIS). PG&E underwent a multi-year regional effort with the U.S. Forest Service (USFS) to obtain new master permits and easements for existing electric facilities across USFS lands. This effort included preparing an Operations and Maintenance Plan (OMP) that outlines the activities needed to fulfill the requirements of maintaining electrical transmission and distribution infrastructure and ancillary facilities across USFS lands. PG&E facilities within the Shasta-Trinity, Six Rivers, and Mendocino National Forests are subject to the OMP and are within the NWFP area.

During the December 5, 2024, public meeting, when a question was asked about how vegetation management was being addressed in utility easements, the USFS stated that utility lines were considered critical infrastructure; however, nowhere in the NWFP Amendment Draft EIS is "critical infrastructure" defined. If USFS considers utility lines to be considered critical infrastructure, PG&E requests that USFS clearly define what critical infrastructure consists of in the final EIS. Additionally, as critical infrastructure, PG&E's utility lines and other facilities should be governed by the approved OMP.

Regarding habitat for northern spotted owl within the NWFP area, PG&E respectfully requests that the USFS consider excluding PG&E's maintained utility corridors as suitable breeding habitat for the owl.

We would also like to point out a discrepancy between what is stated in Table 3-12 and the text on page 3-58. In Table 3-12 under the column "Pre-Disturbance Surveys Practical", for Category C, the table states "Pre-disturbance surveys not required"; however on in the second to the last paragraph on page 3-58, it states "Of the 305 S&M species, a total of 62 species require pre-disturbance surveys (A or C category) because surveys are considered practical for these species." This sentence states that pre-disturbance surveys are required for category C species, while Table 3-12 states that pre-disturbance surveys for category C species are not required.

Finally, we applaud the USFS for considering an expanded role for Tribes in land management decisions within the NWFP boundaries. These goals must be integrated with the process and timelines that are the foundation of the OMP to support timely maintenance of infrastructure and wildfire prevention work.

We look forward to continuing our partnership with the USFS and collaborating to further prevent catastrophic wildfires.

ATTACHMENT-LETTER TEXT: PGE\_NWFP\_comment\_letter.pdf; this is the same content that is coded in text

box; it was also included as an attachment