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First name: Emily

Last name: Newell

Organization: PacifiCorp

Title: Environmental Department Manager

Comments: Please see attached letter.

March 17, 2025

VIA ELECTRONIC FILING

Re: Northwest Forest Plan Amendment #64745

PacifiCorp appreciates the opportunity to provide comments on the United States Department of Agriculture, Forest Service (Forest Service)'s Northwest Forest Plan (NWFP) Amendment and associated Draft Environmental Impact Statement (DEIS). PacifiCorp values the Forest Service's continued efforts to amend the NWFP to, among other stated needs, improve wildfire resistance and resilience across the NWFP area in which PacifiCorp operates as a regulated electric utility. This letter builds upon the themes expressed in PacifiCorp's letter on February 2, 2024, which was jointly submitted to the Forest Service by PacifiCorp and other investor-owned utilities operating in the states of Oregon and Washington within the NWFP area.

Upon review of the alternatives analyzed in the DEIS, PacifiCorp encourages selection and implementation of Alternative D as it most thoroughly addresses the identified needs of the amendment. PacifiCorp agrees with a core tenet reiterated throughout the DEIS, which is that all anthropogenic preservation, conservation, and/or restoration activities to benefit imperiled species pale in comparison to the current scope and scale of the threat of catastrophic wildfire to these species and their habitat. This is evidenced by the analysis provided in Section 3.4 of the DEIS and the fire trends summarized in Figure 3-2 on Page 3-40, which indicates that modest (+3.1%) gains in northern spotted owl (*Strix occidentalis caurina*) habitat over the first 25 years of NWFP implementation were lost more than twofold (-6.8%) in the subsequent five years due to the accelerating frequency and scope of wildfire during those years. Addressing catastrophic wildfire threats is the most effective and efficient tool society has for addressing the myriad of current threats to species and their habitats in the NWFP area. This is best accomplished through adoption of Alternative D.

PacifiCorp does not support Alternative C because it does not meet the stated needs of the amendment to reduce fire resistance and ecosystem resilience and would result in greater risks to PacifiCorp's critical

utility infrastructure and its customers within the NWFP area. DEIS Section

3.8.2.5 identifies the risks associated to public health and safety from wildfire and states that the final amendment should address these risks. Yet the DEIS repeatedly concludes that Alternative C would not improve wildfire risk to communities and would reduce fire resistance and

ecosystem resilience (see DEIS Sections 3.4.2.3, 3.6.2.2, and 3.8.2.5), which is a stated need of the amendment. PacifiCorp suggests that all alternatives should include exceptions for timber harvest regardless of age, dry or moist forest, or managed area designation when in proximity to critical energy infrastructure, as encouraged in Alternative D (see DEIS Section 2.3.4 on Page 2- 9 and Standard FORSTW-LSR-MOI-STD-02-D). The Forest Service identifies in DEIS Section

3.8.2.5 that wildfire [ldquo]can have significant effects on public health and safety and community economics by affecting [hellip] power supplies, [hellip] property and critical infrastructure,[rdquo] and therefore, the final amendment components should address these effects.[rdquo]

While PacifiCorp supports adoption of Alternative D, we understand the final amendment could include any combination of alternatives evaluated in the DEIS. Therefore, the table included here in Attachment A provides comments on specific elements of the alternatives evaluated in the DEIS to aid the Forest Service to select and implement a final NWFP amendment that adequately addresses the threats and challenges posed from wildfire risk and climate change, while adequately protecting critical infrastructure and public safety.

We appreciate the opportunity to provide these comments to the Forest Service and look forward to additional collaboration on these issues. Please contact Emily Newell, Environmental Lands Department Manager, with specific questions on these comments at emily.newell@pacificorp.com or (458) 292-8348.

Respectfully,

[] Environmental Director PacifiCorp

Attachment A [ndash] Detailed Comment Table

Page#: 2-13

Referenced text: FORSTW-LSR-PMA-D: Silviculture - Thinning or other silvicultural treatments inside reserves are subject to review and approval by the Forest Supervisor

Comment: PacifiCorp requests clarification on whether thinning projects or off rights-of-way (ROW) fuels reduction projects adjacent to and along electrical infrastructure would require approval referenced in FORSTW-LSR-PMA-D.

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Topic area: Forest Stewardship [ndash] Late Successional Reserve, Moist Timber Harvest

Page#: 2-14

Referenced text: (FORSTW-LSR-MOI-STD-01-B & FORSTW-LSR-MOI-STD-01-D): No timber harvest shall occur in moist forest stands older than 120 years old in Late- Successional Reserves except to provide for tribal co- stewardship and cultural use or to reduce wildfire risk to communities.

Comment:

PacifiCorp supports the changes made to stand age from 80 to 120 years for timber harvest limitations.

PacifiCorp also supports the exceptions for activities that would reduce wildfire risk to communities and recommends clarification be added to include utility vegetation management (or protection of critical infrastructure) as an activity that reduces wildfire risk to communities. Such exceptions are critical to decrease potential for the devastating effects of wildfire to public safety and infrastructure as well as natural and cultural resources in the NWFP planning area. Such exemptions should be included in the final NWFP amendment.

3

Topic area: Forest Stewardship [ndash] Late Successional Reserve, Moist Salvage Harvest

Page#: 2-15

Referenced text: (FORSTW-LSR-MOI-STD-02-D): No salvage harvest shall occur in Late-Successional Reserves in moist forest stands older than 120 years except to provide for tribal co-stewardship and cultural use, remove hazard and danger trees, or to reduce wildfire risk to communities.

Comment: PacifiCorp supports inclusion of removing hazard and danger trees and activities to reduce wildfire risk to communities. Alternative D would have more beneficial impacts to fire resistance and resilience than the other alternatives by allowing for more risk reducing activities. Measure FORSTW-LSR-MOI-STD-02-D should be included in the final NWFP amendment.

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Topic area: Forest Stewardship - Late Successional Reserves, Moist Guideline for treatments in stands less than 120 years old

Page#:2-16

Referenced text: (FORSTW-LSR-MOI-GDL-01-B & FORSTW-LSR-MOI-GDL-01-D): In young, moist forest stands less than 120 years old in Late-Successional Reserves forest management activities should be designed to maintain or restore late-successional and old-growth forest conditions that[hellip].

Comment: PacifiCorp supports the changes made to stand age from 80 to 120 years for timber harvest limitations. This change should be incorporated in the final NWFP amendment to avoid unnecessary restrictions that could inadvertently lead to increased wildfire risk, and associated devastating effects to public safety, critical infrastructure, and cultural and natural resources throughout the NWFP planning area

5

Topic area: Forest Stewardship, Matrix, Moist

Page#: 2-17

Referenced text: (FORSTW-MTX-MOI-STD-01-B & FORSTW-MTX-MOI-STD-01-D): In moist forests in Matrix, no timber harvest shall occur in old growth stands (those that established prior to 1825) except to provide for tribal co-stewardship and cultural use or to reduce wildfire risk to communities and infrastructure

Comment: PacifiCorp supports the exceptions to timber harvest in old growth stands where such activity would reduce wildfire risk to communities and infrastructure. This exception is important to include in the final NWFP amendment because any preservation, conservation, and restoration activities would be meaningless if a catastrophic fire were to occur.

Alternative C does not include any exceptions for reducing wildfire risk to communities and infrastructure and should be excluded from further consideration.

6

Topic area: Forest Stewardship [ndash] All LUAs, Dry Forests

Page#: 2-18

Referenced text:(FORSTW-ALL-DRY-OBJ-01-B): Within 15 years of amendment approval, implement treatments that contribute to ecological resilience on at least one third of dry forests (527,000-643,000 acres/decade or 790,000 [ndash] 964,000 acres/15 years) across the Northwest Forest Plan area, not including any additional acres of salvage treatments that may occur, by using ecological forestry methods for forest management while also conserving and retaining older trees and promoting the development of future functional old-growth forest

ecosystems appropriate for dry forests.

Comment: PacifiCorp supports FORSTW-ALL-DRY-OBJ-01-B because of the improved resilience to wildfire that would result by treating more acres of dry forests compared to the other alternatives. Such treatments would protect nearly all resources evaluated in the DEIS through decreased risk of wildfire, including existing power line infrastructure that is necessary to provide safe, reliable power to the public and provides social and economic values.

8

Topic area: Forest Stewardship [ndash] Late- Successional Reserves, Dry

Page#: 2-19

Referenced text: (FORSTW-LSR-DRY-DC-01-C): Dry Late-Successional Reserves produce and maintain an optimum level of dense, closed canopy late- successional and old-growth stands on a landscape scale, which provide habitat for old-growth related species, including northern spotted owl. Suitable habitat for northern spotted owl is maintained at an amount equal to the median amount of habitat currently observed in home ranges within the province.

Locations of northern spotted owl habitat change over time.

Comment: Maintaining suitable habitat for northern spotted owl equal to the current median amount observed in home ranges within the province is likely an unrealistic goal due to the challenges faced by climate change and wildfire that may have dramatic effects to northern spotted owl habitat availability. This should be accounted for, as in Alternative D, to ensure the amended NWFP is a realistic planning document. Therefore, PacifiCorp recommends that FORSTW-LSR-DRY-DC-01-C is excluded for further consideration and instead supports FORSTW-LRS-DRY- DC-01-D (see comment on line 9).

9

Topic area: Forest Stewardship [ndash] Late- Successional Reserves, Dry

Page#: 2-19

Reference text: (FORSTW-LRS-DRY-DC-01-D): Dry Late-Successional Reserves produce and maintain an optimum level of dense, closed canopy late- successional and old-growth stands on a landscape scale, which provide habitat for old-growth related species, including the northern spotted owl. Suitable habitat for northern spotted owl is maintained at an amount reflective of a range of historic conditions within the inherent capability of the landscape given expected fire activity and other effects of climate change. Locations of northern spotted owl habitat change over time, but generally concentrate in areas more likely to persist.

Comment: PacifiCorp supports the revised desired condition described in Alternative D to maintain suitable northern spotted owl habitat in a manner that considers expected effects of climate change, including fire activity. This allows for a realistic approach given the dynamic conditions that exist in the current and future landscape within the NWFP planning area. To ensure the amended NWFP has achievable standards and goals, FORSTW-LRS-DRY-DC-01-D should be incorporated into the final NWFP amendment.

10

Topic area: Forest Stewardship [ndash] Late- Successional Reserves, Dry

Page#: 2-19

Referenced text: (FORSTW-LSR-DRY-DC-03-C): Suitable habitat for northern spotted owl is maintained at an amount equal to the median amount of habitat currently observed in home ranges within the province. Locations of northern spotted owl habitat change over time.

Comment: See comment on line 8.

11

Topic area: Forest Stewardship [ndash] Late- Successional Reserves, Dry

Page#: 2-19

Referenced text: (FORSTW-LSR-DRY-DC-03-D): Suitable habitat for northern spotted owl is maintained at an amount reflective of a range of historic conditions within the inherent capability of the landscape given expected fire activity and other effects of climate change. Locations of northern spotted owl habitat change over time, but generally concentrate in areas more likely to persist.

Comment: See comment on line 9.

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Topic area: Forest Stewardship [ndash] Late Successional Reserve and Managed Late Successional Areas, Dry

Page#: 2-20

Referenced text: (FORSTW-ALL-DRY-GDL-03-B): In Late-Successional Reserves in dry forests limited fuel management salvage is permitted when beneficial to restoration goals, fire resilience, wildlife needs, and local communities. Dry forest salvage should retain a high number of large snags as well as all live trees. Exceptions to these constraints are allowed for, protection of critical infrastructure and along existing system roads

Comment: PacifiCorp supports exceptions that would protect critical infrastructure and existing system roads. Such exceptions would serve to avoid potentially catastrophic effects to critical systems.

13

Topic area: Forest Stewardship [ndash] Late- Successional Reserves, Dry

Page#: 2-20

Referenced text: (FORSTW-ALL-DRY-PMA-D): Late-Successional Reserves in dry forests should reflect dynamic, fire- prone landscapes. They should be managed with anticipation of further change through wildland fire, and with an aim to create a sustainable range of seral stages, reflecting the characteristic fire frequency and severity of these landscapes.

Comment: PacifiCorp supports managing dry forest landscapes to reflect dynamic, fire-prone conditions because it will result in a management strategy that complements natural processes rather than combatting them, minimizing risk of catastrophic fire. However, because this would mimic a landscape with more frequent fire, management actions must consider critical infrastructure within the planning area and work with the owners of such infrastructure to avoid inadvertent adverse effects to the social and economic values provided by the infrastructure.

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Topic area: Fire Resilience [ndash] All LUAs

Page#: 2-20

Referenced text: (FIRE-ALL-OBJ-01-B): Treat 2.65 million acres per decade employing all fuels treatments across all LUAs[hellip].

(FIRE-ALL-OBJ-01-C): Treat 50% of current fuels and vegetation management relative to alternative A or 1.25 million acres per decade.

(FIRE-ALL-OBJ-01-D): Treat 4.95 million acres per decade employing all fuels treatments across all LUA, including 900,000 acres/decade in and adjacent to community protection areas (1 mile buffer HUD)

Comment: PacifiCorp supports treating as many acres as feasible to reduce risk of wildfire, and therefore supports FIRE-ALL- OBJ-01-D. However, treatments using prescribe fire must consider critical infrastructure within the planning area and work with the owners of such infrastructure to avoid inadvertent adverse effects to the social and economic values provided by the infrastructure.

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Topic area: Fire Resilience [ndash] All LUAs

Page#: 2-21

Referenced text: (FIRE-ALL-GDL-05-D): [ldquo][hellip]managing smoke emissions reducing fuel loading protecting communities and infrastructure[rdquo]

Comment: Use of wildland fire should always incorporate protection of communities and infrastructure to avoid significant adverse effects to public safety and social and economic values provided by critical infrastructure. The

last bullet of FIRE- ALL-GDL-05-D should be incorporated into the final NWFP amendment to avoid such effects.

17

Topic area: Fire Resilience [ndash] All LUAs

Referenced text: (FIRE-ALL-GDL-06-D): Within all LUAs, to improve efficiency in implementing actions to reduce the threat of wildfire adjacent to communities, areas of Tribal importance, and infrastructure, treatments to reduce hazardous fuels within a 0.25-mile buffer of these areas are exempted from pre-disturbance surveys, and associated management requirements as described in 2001 ROD and S&Gs for Amendment to Survey and Manage for species identified in Table 1-1 (April 2014, or subsequent update). Management of known sites shall not be exempt.

Comment: PacifiCorp supports the exceptions to pre-disturbance surveys, and associated management requirements as described in 2001 ROD and S&Gs for Amendment to Survey and Manage for species identified in Table 1-1 (April 2014, or subsequent update) where such activity would reduce wildfire risk to communities. PacifiCorp also recommends that activities reducing wildfire risk to critical infrastructure also be exempt to avoid significant adverse effects to public safety and the social and economic values provided by such infrastructure. These exemptions are also important to include in the final NWFP amendment because any preservation, conservation, and restoration activities would be meaningless if a catastrophic fire were to occur.

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Topic area: Fire Resilience - All LUAs

Page#: 2-21

Referenced text: (FIRE-ALL-PMA-D): In some cases, exemption buffers wider than 0.25-mile may be appropriate. This would be determined at the project level following national, regional and forest policies regarding wildfire risk assessment. National forest units within the NWFP area should coordinate and engage with local governments, States, and Tribes to discern appropriate buffer widths, and to specify which management activities would be covered by this exemption

Comment: PacifiCorp supports the potential for wider buffer widths to qualify for exemptions that would be determined at the project level and recommends this buffer width be applicable to activities reducing wildfire risk to critical infrastructure as stated in comment on line 17. Not all situations within the planning period can be predicted. Allowing for flexibility on an as-needed basis is important when managing such a dynamic landscape with so many valuable resources.

PacifiCorp recommends FIRE-ALL-PMA-D to be included in the final NWFP amendment and that a recommended timeframe be provided to the individual forest units when considering buffer exemptions.

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Topic area: Support Economic Opportunities and Sustainable Communities

Page#: 2-22

Referenced text: ECONSUST-PMA-C) Consider the value of recreation infrastructure when designing permanent fuel breaks so that the Forest Service can reduce wildland fire risks to outdoor recreation assets and their associated community benefits while still maintaining the scenery management objectives of a given area.

Comment: Fuel breaks should also consider critical infrastructure, such as utility power lines, and the Forest should work together with utilities when planning prescribed burns and establishing fuel breaks.

ATTACHMENT-LETTER TEXT: NWFP Amendment DEIS PacifiCorp Comments FINAL.pdf; This is the same content that is coded in text box; it was originally included as an attachment