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Subject: Sierra and Sequoia National Forests Plan Revision Objection

Dear Planning Team:

We appreciate your thoughtful and detailed forest plan updates, but we are writing to express several objections to the updates of the Sierra and Sequoia National Forest Land Management Plan (LMP) updates.

I. Introduction and Background

PG&E is the largest investor-owned utility in California. A significant portion of our electric transmission and distribution facilities are located on National Forest System (NFS) lands. Specifically, we operate and maintain more than 400 miles of electric transmission lines, 790 miles of electric distribution lines, and 4 70 miles of utility access roads that collectively occupy approximately 7,300 acres across 11 National Forests in Region 5. On the Sequoia National Forest, this includes approximately 12 miles of transmission facilities, 40 miles of distribution facilities, and 5 miles of utility roads. On the Sierra National Forest, this includes approximately 96 miles of transmission facilities, 100 miles of distribution facilities, and 57 miles of utility roads. We previously commented on the LMPs on September 25, 2019, requesting updates and modifications to accommodate our work.

PG&E has worked cooperatively with the USFS and has various authorizations that allow the utility to operate and maintain its infrastructure in a way that delivers reliable power, reduces the risk of wildfire, and protects environmental resources and the public.

II. Objections

We acknowledge the importance and value of the USFS' efforts to update the LMPs, and we submit these comments in the spirit of continuing a constructive dialogue on how to maintain the objectives of the USFS as well as those of PG&E. Based on this, we have the following objections to the LMPs.

Forest Service has Not Included a Utility Land Allocation and Management Area

Utility maintenance work is needed along utility lines to continue to deliver reliable power and these areas have unique management needs. We continue to recommend the development of a utility-specific land allocation and management area along utility corridors. In a meeting in 2017 with then-Regional Forester Randy Moore, he suggested to PG&E, Southern California Edison and USFS staff that a long-term management goal should

be to attribute utility corridors for land allocations. Land allocation will ensure that the management needs along utility corridors are maintained for that purpose. As currently written, there are multiple objectives within the facility corridor and utility maintenance does not always appear to be the highest priority use. It would be much clearer if there was a land allocation that had identified desired conditions, goals, standards, guidelines, and management approaches; there are some of these elements in the energy and infrastructure components of the LMP but these are very brief.

Utility Lines are Community Assets, but also Regional Assets

In the LMPs, Utility lines are described in connection to community assets and wildfire management/protection zones, but they are more. They are regional assets; they are critical infrastructure that connects communities and the region. Based on our review of USFS' LMP wildfire protection zones, not all transmission and distribution lines are located within community wildfire safety areas. In the screenshots below using the USFS online data viewer with utility facility corridors added in red, there are gaps in coverage (e.g., areas not in orange).

<Utility Maps>

Utility facilities need protection in areas where they occur - irrespective of labeling on a map - as power is needed to maintain public health and safety. This includes maintaining power for all users of the forest.

Full Suite of Vegetation Management Options is Needed in the Utility Right-of-Way

A full suite of vegetation management options is needed within the utility corridors and right-of-way (ROW). For example, the utilities need to be able to create a wire-zone, border-zone, and hazard-tree exclusion zones. Vegetation management options include chipping, mastication, and selective herbicide use to control the vegetation structure and height within the ROW. In these areas, timber production is not consistent or compatible with maintenance of the facility corridor. Similarly, expectations for species and habitat management within corridors should be adjusted to be consistent with utility corridor maintenance objectives. If there are conflicting objectives, the public health and safety objectives associate with utility work should prevail.

Expectations for Avoidance of Sensitive Habitat and Species

The LMPs sets a high bar for avoidance of sensitive habitat and species. While the utilities strive to avoid and minimize impacts to sensitive habitat and species and will continue to do so, the priority should be to allow continued utility facility maintenance in the utility ROWs. Many of our facilities overlap with riparian conservation areas which limit equipment use in these areas (i.e., mechanical exclusion zones 150' of perennial waters and 75' of intermittent streams); there are instances where these exclusion zones are unable to be followed. The LMP also describes a limited operating period (LOP) requirement for work in deer breeding and fawning key summer range areas and for rutting season in key winter range areas. We need to work closely with the USFS to better evaluate if our facilities overlap these areas. If so, implementing LOPs for deer will be challenging for us to implement when conducting vegetation management work which is already heavily seasonally, and resource constrained.

Expectations for Curation of Cultural Resources

The LMPs call for cultural resources to be curated at USFS-approved repositories. It should be noted that curation facilities are hard to come by and not readily available. Ideally a list of potential pre-approved facilities would be listed in the LMP.

Energy and Infrastructure Sections are Brief

The LMP information on energy and infrastructure is slim. Additional conditions, goals, and standards would help ensure that utility maintenance work would continue to benefit the public and protect public safety. We would be happy to work with USFS to help develop this additional information.

Relationship to O&M Plan

After several years of collaboration with USFS, the utilities were able to develop an operations and maintenance plan (O&M Plan) that describes how work on NFS lands will proceed. The utilities believe the O&M Plan is consistent with the conditions, goals, and standards of LMP as the O&M Plan was written to comply with law, regulation, and policy and to comply with the Federal Land Planning and Management Act (FLPMA) Section 512. The utilities must be able to conduct their work to comply with state and federal law. There have been instances where the Utility and USFS have been held responsible for wildfire damages due to lack of maintenance work on the facilities and in the utility corridor. We want to avoid potential maintenance restrictions where the utility or federal government could be held liable.

Roads

The LMPs pay little attention to roads as roads are part of travel management planning. However, roads are necessary to effectively maintain utility facilities. To this end it would help if the LMPs placed more emphasis on the importance of roads to maintain existing infrastructure.

III. Conclusion

Overall, the updated LMPs articulate the USFS' priorities in the Sequoia and Sierra National Forests and are an improvement over past LMPs. However, we would like the USFS to consider our request for a land allocation and to clarify the importance of allowing utility maintenance work to proceed within the utility ROWs beyond wildfire management and protection zones.

Sincerely,

Lara Weyant

Principal Land Consultant PG&E