



PACIFIC FOREST TRUST

Caroline Thomas Jacobs  
Director  
Wildfire Safety Division, California Public Utilities Commission

June 30, 2020

**Re: Comments on the draft Roadmap for WMPs**

Ms. Caroline Thomas Jacobs,

Pacific Forest Trust (PFT) would like to thank you for your work with the Wildfire Safety Division (WSD) and California Public Utilities Commission (CPUC) to ensure electrical utilities are taking effective actions to reduce utility-related wildfire risk. Many of the major fires sparked by utility infrastructure in the last decade have occurred in, and significantly impacted, California's forests. PFT is a non-profit active in enhancing the health and function of the state's forests for the last 30 years. Our mission is to sustain America's forests for their public benefits of wood, water, wildlife, and people's well-being, in cooperation with landowners and communities. As you know, forest conservation, restoration, and management are critical in reducing the severe wildfires California now faces. While fire is a natural part of California's ecosystems, the recent uncharacteristically intense wildfires are the result of years of fire suppression, unplanned land development in the Wildland-Urban interface (WUI), past management decisions, and climate change. Reducing wildfires' negative impacts will take the collaboration of multiple parties, including the CPUC.

In addition to holding utilities accountable, the state should also align its wildfire mitigation efforts with climate-resilient forest management in order to protect residents and the lands they rely on. We are pleased to see two of the six objectives in the draft *Utility Wildfire Mitigation Strategy and Roadmap for the Wildfire Safety Division* are for natural resources and climate action. As such, we offer the following recommendations to the draft Roadmap to strengthen these objectives:

**1. Define "sustainable and resilient forests" for the natural resources objective.**

The natural resources objective should define "sustainable and resilient forests" to better guide implementation of this goal. Healthy forests have more natural characteristics, with a higher proportion of older, larger trees, which are fire and drought resilient, as well as more natural spacing, structure, and composition. To beneficial coincidence, these forests also store more carbon, in addition to reducing fire risk and associated carbon emissions. Multiple forms of management promote these conditions. This is most effective at the landscape scale, not fragmented by unplanned development and an expanding WUI. To reduce the extent of the WUI and promote

healthy forested landscapes, Working Forest Conservation Easements are a common tool the state uses to keep lands forested and guide management to restore and maintain more natural conditions and healthy function.

**2. Highlight the links between forest management and energy in the climate action objective.**

Utility wildfire mitigation activities, such as forest management, can also advance climate change goals. The WSD should explore the opportunity for a closed-cycle, carbon-negative approach to developing a sustainable woody biomass energy component in the state. This could be fueled by the materials derived from restoration and management in both more rural overstocked forests and the WUI. Proper management can make forests more fire-resilient and carbon-rich, all while sustainably producing material to meet energy needs that help California meet its climate goals.

**3. Combine efforts to minimize utility-related wildfire risk with other state efforts to strengthen effective collaboration and long-term resilience principles.**

Wildfire risk reduction actions have synergy with many other efforts the state is pursuing, such as multiple initiatives to increase water security and economic resilience. Forest restoration and conservation efforts to reduce wildfire risk are the same actions that also boost water and economic security for the long-term. Healthy forests and watersheds provide cleaner and more abundant water to downstream storage reservoirs, and also provide opportunities for regional communities to participate in a robust forest-based economy. These efforts, as identified in multiple state goals and documents (ARB's Scoping Plan, the State Water Action Plan, the Wildlife Adaptation Plan, the Forest Carbon Plan, etc.) are synergistic and complement the goals of the CPUC Roadmap. Acting collaboratively with those efforts should be called out in the Roadmap to reinforce the effective collaboration and long-term resilience principles.

Thank you for providing the opportunity to comment on the draft Roadmap, and we look forward to working with the WSD to ensure California's forests and communities are resilient and safe from catastrophic wildfire.

Sincerely,

A handwritten signature in black ink that reads "Laurie A. Wayburn" with a long horizontal flourish extending to the right.

Laurie A. Wayburn  
President  
Pacific Forest Trust