

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans
Rulemaking 18-10-007
Data Response**

PG&E Data Request No.:	WSD_007-Q05		
PG&E File Name:	WildfireMitigationPlans_DR_WSD_007-Q05		
Request Date:	March 1, 2021	Requester DR No.:	WSD-2021 WMP-02
Date Sent:	March 4, 2021	Requesting Party:	Wildfire Safety Division
PG&E Witness:		Requester:	Ryan Arba

QUESTION 05

P. 628 "Long-term, PG&E is planning on better partnerships and agreements with agencies to perform vegetation management work on federal or state lands without additional permitting requirements that could slow the mitigation of crucial work activities."

- a. List out current and planned pathways to streamline permitting processes with each partnering agency, including but not limited to USFS, CalFire, State Parks, NPS, CDFW, RWQCB, and local governments.
- b. What is PG&E's process, including timelines used, to notify and file notifications/permits with each partnering agency prior to regular vegetation management work, enhanced vegetation management work, and emergency response work (including but not limited to response post-wildfire)?

ANSWER 05

- a. Pathways to enhance communication with the agencies PG&E Vegetation Management encounters is variable and considered a continuous improvement opportunity. While many of the approaches have been consistent over the years, this response will focus on historical efforts in addition to newer approaches by the agency categories itemized below.

Federal and State Environmental and Resource Agencies and Land Management Agencies:

- PG&E holds long-term permits with the following Federal Agencies, and these permits are associated with long term Operation and Maintenance (O&M) plans that allow for streamlined permitting and approval steps and therefore reducing timeframes. PG&E holds O&M plans with USFS and NPS. Through these agreements, PG&E also hosts annual and ad-hoc meetings to discuss work coordination, share plans, and discuss opportunities for collaboration on common goals and efforts that may support these common goals.

- PG&E holds a short-term agreement with State Parks which functions as an O&M plan (similar to the ones on the federal side) and is working on developing a long-term agreement.
- BLM has issued a temporary Instruction Memorandum (IM) (which has been renewed several times) to allow for utility wildfire-related work to occur in California through a streamlined approach and with a post-work reporting process. The post-reporting process allows for collection on data that will then be used to establish a long-term agreement and O&M plan. PG&E is developing an O&M plan and long-term agreement with BLM.
- PG&E holds 3 long-term permits and associated Habitat Conservation O&M plans (HCP) with USFWS that provide incidental take coverage for listed and endangered species and their habitats.
- PG&E holds 1 Incidental Take Permit (ITP) with CDFW linked to the San Joaquin Valley HCP and is currently finalizing another ITP with CDFW linked to the Bay Area HCP.
- PG&E is currently working with CALFIRE on applicability of Utility Exemption for vegetation management and Wildfire Mitigation Plan activities.
- PG&E is currently working with Caltrans on possibilities to streamline some of the permitting processes when working within Caltrans right-of-way (ROW).
- PG&E is working on coordinating with Tribal Communities to establish stronger relationships and possible programmatic agreements.
- PG&E has been meeting with RWQCB to discuss wildfire programs and coordinate data sharing for vegetation management programs.

Local Governments:

Encroachment Permits: County and City Department of Public Works are engaged at least quarterly to share upcoming work plans and challenges. However, timelines may shift depending on volume or sensitivities. The PG&E Encroachment Permit Team, in conjunction with Vegetation Management, works to establish fast flow programmatic permitting to pre-approve large scopes of vegetation work prior to inspections taking place.

- Tree Removal Permits: Initial engagement with County agencies walks through PG&E tree removal permitting exemptions, where applicable. With annual and redundant patrols, the need and volume of tree removal permits varies, but PG&E's Vegetation Management representatives work with counties on an on-going bases to secure the proper permits for tree removals.

- b. As noted and presented in response to Question a., PG&E's process varies due to the number of agencies and their unique requirements. Work required on any given property or jurisdiction varies each year and in some cases is cyclical or limited. The most frequent and consistent engagements are described below by category if not already provided in response to Question a.

Federal/State Agencies:

- PG&E follows the processes outlined in the various O&M plans with regards to the screening for proposed work to identify resources, conduct environmental and scope reviews, conduct appropriate notifications, and go through the permitting/approval processes. These processes and timelines are outlined in each O&M plan and agreement stipulated with such agencies. Agencies include: NPS, USFS, State Parks, USFWS, and CDFW.
- For agencies with which PG&E does not have long-term agreements and O&M plans, and when the proposed scope of work triggers the need to acquire a permit or approval from an environmental resource agency, PG&E follows the process and steps as outlined by the specific resource agency.
- For work on BLM: PG&E follows the IM notification process.
- With regards to emergency response: For agencies for which PG&E holds O&M plans, agreements, and established processes, as described above, PG&E follows the emergency notification process as outlined in each agreement and O&M plan. For agencies with which PG&E does not hold long-term agreements, O&M plans, or established processes, PG&E conducts the appropriate post-emergency notification to resource agencies.

Local Governments:

Encroachment Permits: PG&E's Encroachment Permit Team first submits encroachment permits on a quarterly/bi-annual bulk submittal basis, where allowed by the agency, for proposed inspection areas and where we can utilize annual/programmatic permits that grant pre-approval of work. For agencies where this is not allowed, or we do not have annual/programmatic permits, the submission timeframe varies between 10-45 days depending on work type. Pre-work notifications take place on a rolling weekly look ahead.

- Tree Removal Permits: PG&E submits tree removal permit applications on an as-needed basis. With annual and redundant patrols, the need and volume varies, but PG&E's Vegetation Management representatives work with counties on an ongoing basis to secure the proper permits for tree removals.