

Order for Waste Discharge Requirements and Clean Water Act Section 401 Water Quality Certification for Electric Utility Operations and Maintenance Activities Related to Wildfire Mitigation and Other Similar Activities

CEQA Scoping Meeting



Permitting and Enforcement Unit II, February 18, 2022

Agenda

- Background
- Meeting Purpose
- Project Purpose
- Project Scope
- Project Description
- General Order Structure
- CEQA Process
- Schedule
- Public Comment



Terray Sylvester, Reuters, 2018

Background

- Senate Bill 901 (Dodd, 2018)
 - Increases the pace and scale of wildfire mitigation activities
- Wildfire Mitigation Plans
 - Electrical utility plans to reduce the risk of facility wildfire ignition
- Plan activities have the potential to discharge waste that could impact water quality

The State Water Board values the critical public safety work completed by the utilities and wants to ensure our permit supports this critical work

Meeting Purpose

- **Receive public and agency input on scope and content of Environmental Impact Report (EIR)**
- State Water Board will consider comments while preparing the EIR
- Comments can be provided by:
 - Speaking at this meeting
 - E-mail or mail by noon on March 4



Project Purpose

The goal of the proposed General Order is to develop a streamlined permitting process for utility wildfire mitigation plan activities and other similar activities that protects aquatic resources (e.g., wetlands, stream channels and lakes).

Project Scope

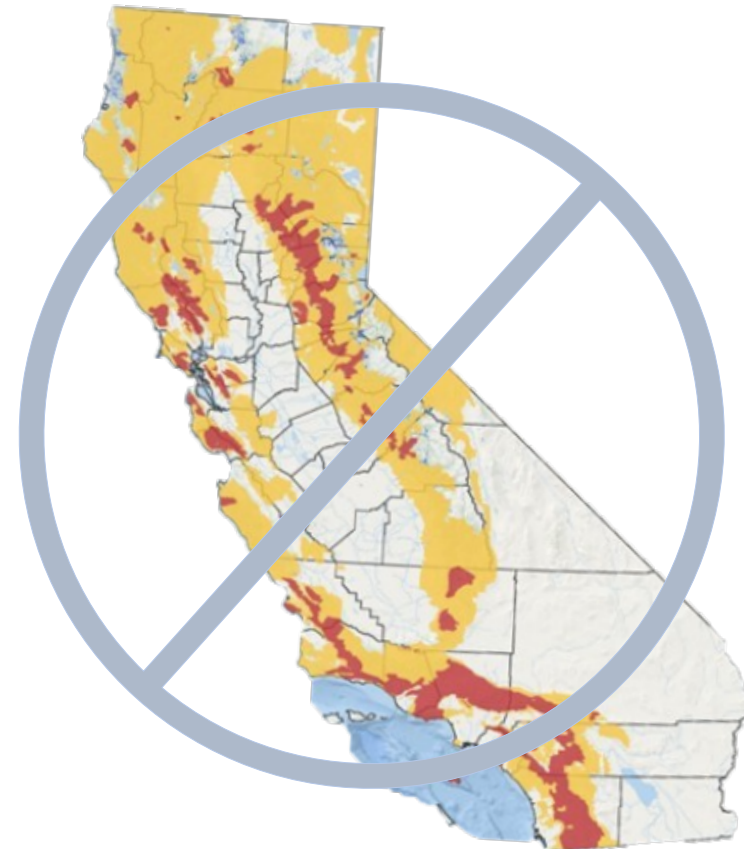
- Electric utilities
- System hardening
- Vegetation management



Statewide Geographic Scope



Statewide Geographic Scope



CPUC High Fire-threat District Map

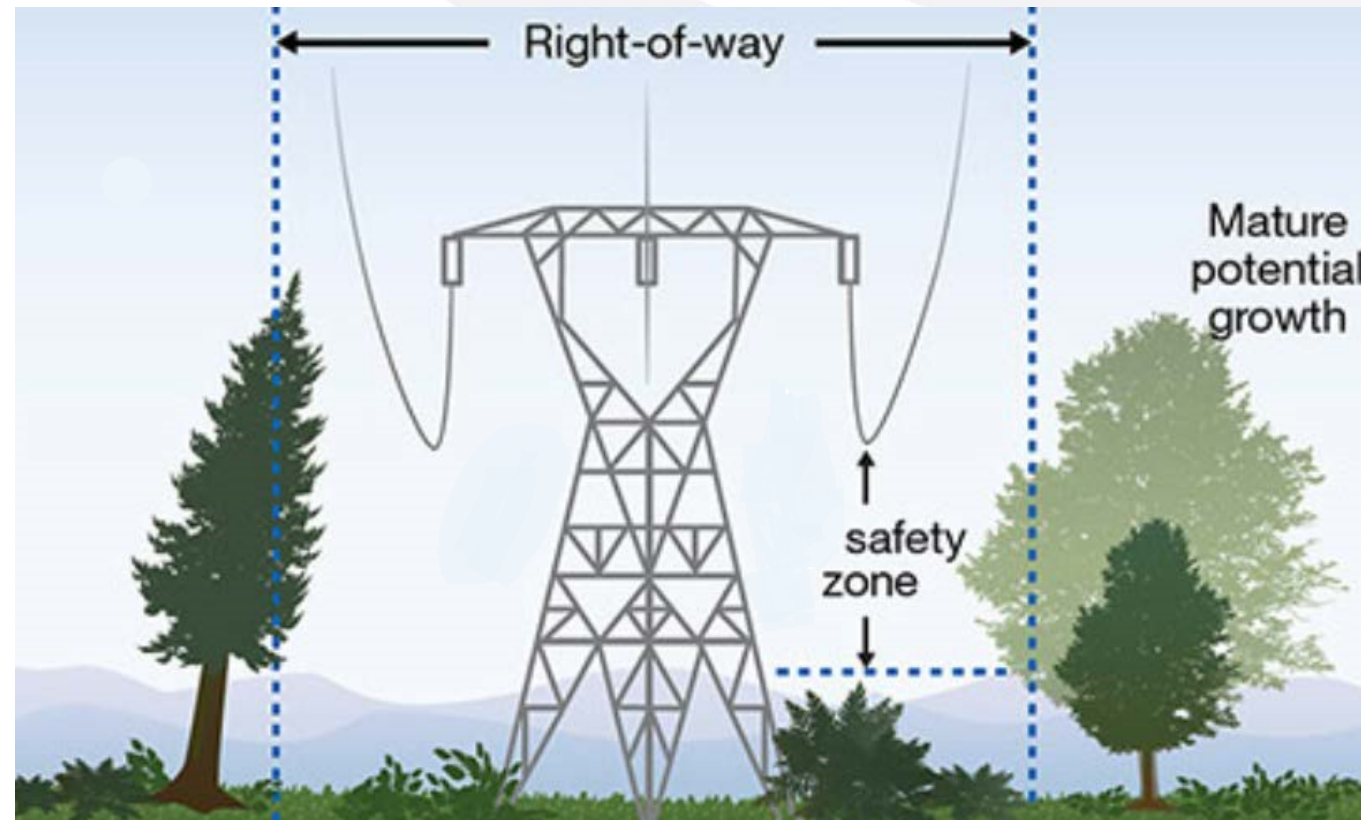
Project Description

A variety of electric utility activities take place throughout the State and are proposed for General Order inclusion:

1. Vegetation management	8. Transmission Tower Maintenance
2. Post-fire response	9. Structural Conversion
3. Site access development/maintenance	10. Line Reconductoring
4. Fire Retardant or Suppressant Application	11. Undergrounding Powerlines
5. Staging Areas and Laydown Yards	12. Boardwalk Repairs or Replacement
6. Pole/Tower Repairs or Replacement	13. Electric Utility Infrastructure Lowering, Maintenance, Replacement or Removal
7. Substation Maintenance	

Vegetation Management

Trimming, mowing, removal, pesticide application, or other prevention methods used to manipulate vegetation underneath or adjacent to existing circuits, electrical structures and facilities.



Bonneville Power Administration, Oregon, 2022

Post-Fire Response



Cal Recycle, 2022

Hazardous tree removal, repair and replacement of burned facilities.

Site Access

- Creation, maintenance, improvements (e.g., grading, blading, graveling, brushing) of roads used to access electric utility facilities.
- Drainage crossings, culverts, ditches and side drains.
- Placement of mats or other materials such as sandbags or sheet piles to gain access and perform work.



Handbook for Forest, Ranch and Rural Roads, 2015

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General Order Structure

- 401/WDR
- List of covered activities
- Prohibitions on enrollment
- Conditions



Proposed Project Alternatives

- Alternative 1 - Proposed Project: Combined 401 Certification/WDR
- Alternative 2 - No Project
- Alternative 3 - Consider only fire prevention work (do not include post fire activities)
- Alternative 4 - Limit the permit to only high fire threat areas as specified in SB901
- Alternative 5 - Separate permits for in water work (401 Certification) and out of water work (WDR)



Written Comments

Address comments to:

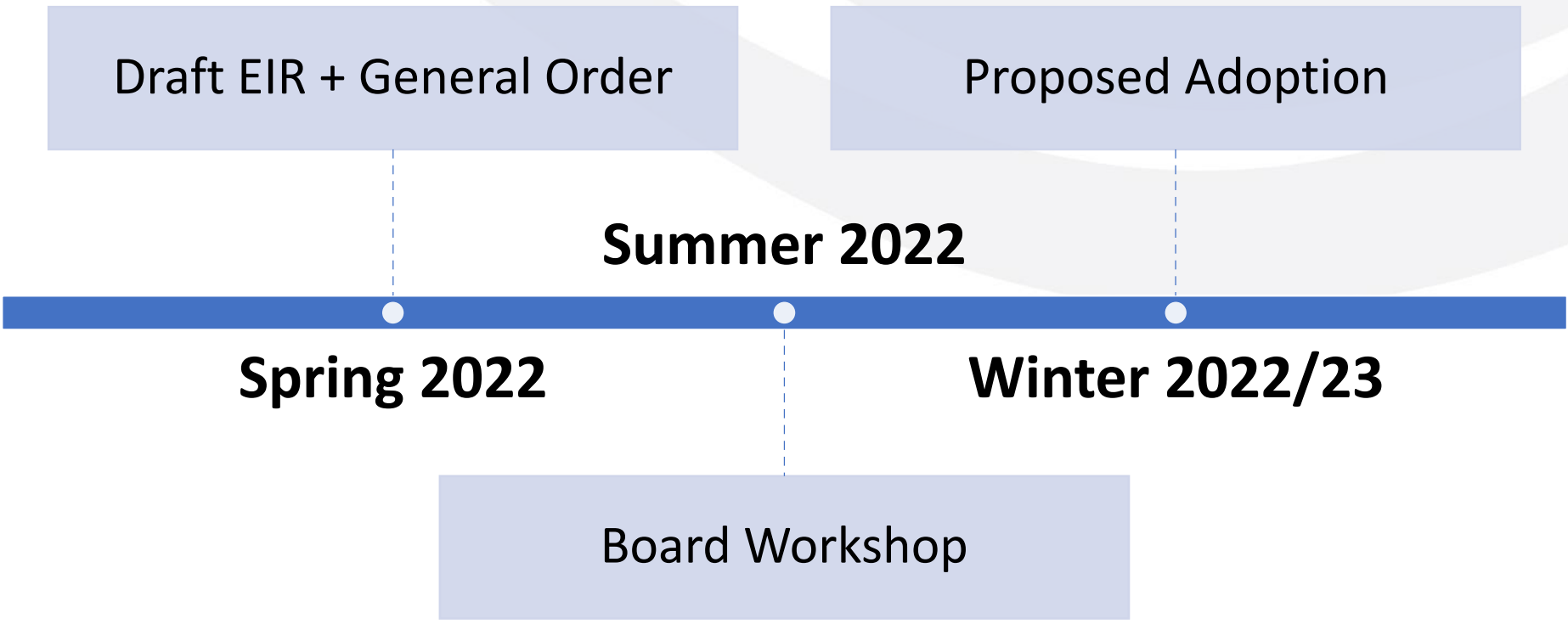
Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000 (mail)
1001 I Street, 15th floor, Sacramento, CA 95814 (hand-delivered)

or email to:

commentletters@waterboards.ca.gov

With the subject line **“Comment Letter – Proposed Electric
Utility General Order”**

Schedule



CEQA Process

- State Water Board is Lead Agency
- Programmatic EIR
- Public comment period on the scope and content of the EIR:
 - Ends at noon on March 4, 2022

Thank you for commenting...

- **To comment, add your name and affiliation to the chat**
- Unmute once called. Mute when you are done speaking
- Slides and future project information will be available at:
https://www.waterboards.ca.gov/water_issues/programs/cwa401/statewide-utility-wildfire-mitigation-general-order.html



California Department of Fish and Wildlife, 2022