

**LASSEN MUNICIPAL UTILITY  
DISTRICT  
WILDFIRE MITIGATION PLAN  
2021 INFORMATIONAL RESPONSE**

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**RESPONSES TO WILDFIRE SAFETY ADVISORY  
BOARD'S 2021 GUIDANCE ADVISORY OPINION**

June 11, 2021

## I. PURPOSE OF THIS 2021 INFORMATIONAL RESPONSE

The California Wildfire Safety Advisory Board (WSAB) issued the *Guidance Advisory Opinion for the 2021 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Cooperatives* (“2021 WSAB Guidance Advisory Opinion”) on December 15, 2020. [POU] provides this document to the WSAB in order to respond to each of the recommendations included in the 2021 WSAB Guidance Advisory Opinion. POUs will provide a narrative response and/or a cross reference to the location in [POU]’s Wildfire Mitigation Plan (WMP) where the topic is addressed. Where the recommendation is not applicable to [POU], the response will provide a brief description supporting this conclusion.

## II. CONTEXT SETTING INFORMATION

WSAB requested that POUs provide an informational table to assist the Staff and Board member in understanding the unique characteristics of each POU.

**Table 1: Context-Setting Information**

Utility Name	LMUD	
<b>Service Territory Size</b>	1,933 square miles	
<b>Owned Assets</b>	X Transmission X Distribution <input type="checkbox"/> Generation	
<b>Number of Customers Served</b>	10,500 customer accounts	
<b>Population Within Service Territory</b>	15,000 people	
<b>Customer Class Makeup</b>	<i>Number of Accounts</i>	<i>Share of Total Load (MWh)+</i>
	86% Residential; N/A % Government; 1% Agricultural; 12% Small/Medium Business; 1% Commercial/Industrial	70% Residential; N/A % Government; Not a Class 6 % Agricultural; 22 % Small/Medium Business; 2 % Commercial/Industrial
<b>Service Territory Location/Topography<sup>1</sup></b>	4% Agriculture 1% Barren/Other 35% Conifer Forest 1% Conifer Woodland 1% Desert 0% Hardwood Forest	

<sup>1</sup> This data shall be based on the California Department of Forestry and Fire Protection, California Multi-Source Vegetation Layer Map, depicting WHR13 Types (Wildlife Habitat Relationship classes grouped into 13 major land cover types) available at: <https://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfbf4665989eb3>.

	<p>0% Hardwood Woodland  2% Herbaceous  49% Shrub  0% Urban  5% Water</p>
<b>Service Territory Wildland Urban Interface<sup>2</sup> (based on total area)</b>	<p>3% Wildland Urban Interface;  5% Wildland Urban Intermix;</p>
<b>Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)</b>	<p><input checked="" type="checkbox"/> Includes maps  Tier 2: 85%  Tier 3: 0%  (Remaining 15% of service territory contains water features, high elevation meadows, and desert).</p>
<b>Prevailing Wind Directions &amp; Speeds by Season</b>	<p><input type="checkbox"/> Includes maps  The LMUD service territory experiences wind patterns normal of the eastern escarpment of the Sierra Nevada characterized by seasonal wind patterns exceeding 10 mph with gusts of 30 mph being common. The prevailing wind pattern is from the southwest, with winter winds averaging 6-8 mph, spring winds 8-20mph, summer winds 7-15 mph, and fall winds 6-10 mph.</p>
<b>Miles of Owned Lines Underground and/or Overhead</b>	<p>Overhead Dist.: 350 miles  Overhead Trans.: 80 miles  Underground Dist.: 75 miles  Underground Trans.: 0 miles</p>
	<b>Explanatory Note 1 - Methodology for Measuring "Miles":</b> Line miles
	<b>Explanatory Note 2 – Description of Unique Ownership Circumstances:</b> NA
	<b>Explanatory Note 3 – Additional Relevant Context:</b> NA
<b>Percent of Owned Lines in CPUC High Fire Threat Districts</b>	<i>Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)</i>
	<p>Tier 2: 48%  Tier 3: 0%</p>
	<i>Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)</i>
	<p>Tier 2: 51%  Tier 3: 0%</p>
	<b>Explanatory Note 4 – Additional Relevant Context:</b> [e.g., explain any difference from data reported in WMP due to different numerator used for this form]
<b>Customers have ever lost service due to an IOU PSPS event?</b>	<p>Yes <input checked="" type="checkbox"/> No  Though LMUD is susceptible to PSPS, LMUD has the ability to provide power to all circuits through the islanding process with Honey Lake Power (HLP),</p>

<sup>2</sup> This data shall be based on the definitions and maps maintained by the United States Department of Agriculture, as most recently assembled in *The 2010 Wildland-Urban Interface of the Conterminous United States*, available at [https://www.fs.fed.us/nrs/pubs/rmap/rmap\\_nrs8.pdf](https://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf).

	whereby LMUD customers will be directly serviced by HLP during an emergency event that affects power supply.
Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No LMUD would consider the option to pre-emptively shut off electricity during extraordinary conditions.
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No During periods of elevated fire risk, LMUD places key systems on non-reclosed settings.

### III. CROSS REFERENCE TO STATUTORY REQUIREMENTS

WSAB requested that POUs provide a clear roadmap as to where each statutory requirement is addressed within the POU WMP.

**Table 2: Cross References to Statutory Requirements**

Requirement	Statutory Language	Location in WMP
Persons Responsible	PUC § 8387(b)(2)(A): An accounting of the <b>responsibilities of persons</b> responsible for executing the plan.	Section III Page 5
Objectives of the Plan	PUC § 8387(b)(2)(B): The <b>objectives</b> of the wildfire mitigation plan.	Section II Page: 3
Preventive Strategies	PUC § 8387(b)(2)(C): A description of the <b>preventive strategies and programs to be adopted by the local publicly owned electric utility</b> or electrical cooperative to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.	Section IV Page 9
Evaluation Metrics	PUC § 8387(b)(2)(D): A description of the <b>metrics the local publicly owned electric utility or electrical cooperative plans to use to evaluate the wildfire mitigation plan’s performance</b> and the assumptions that underlie the use of those metrics.	Section VII Page 19
Impact of Metrics	PUC § 8387(b)(2)(E): A discussion of how the <b>application of previously identified metrics</b> to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	Section VII Page 19
Deenergization Protocols	PUC § 8387(b)(2)(F): <b>Protocols for disabling reclosers and deenergizing portions of the electrical distribution system</b> that consider the associated impacts on public safety, as well as	Section IV(J)&(K) Page 13

	protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	
<b>Customer Notification Procedures</b>	<b>PUC § 8387(b)(2)(G):</b> Appropriate and feasible <b>procedures for notifying a customer</b> who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.	Section IV Page 15
<b>Vegetation Management</b>	<b>PUC § 8387(b)(2)(H):</b> Plans for vegetation management.	Section IV Page 15
<b>Inspections</b>	<b>PUC § 8387(b)(2)(I):</b> <b>Plans for inspections</b> of the local publicly owned electric utility’s or electrical cooperative’s electrical infrastructure.	Section IV Page 12
<b>Prioritization of Wildfire Risks</b>	<b>PUC § 8387(b)(2)(J):</b> A list that <b>identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility’s or electrical cooperative’s service territory.</b> The list shall include, but not be limited to, both of the following:  (i) Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility’s or electrical cooperative’s equipment and facilities.  (ii) Particular risks and <b>risk drivers</b> associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility’s or electrical cooperative’s service territory.	Section IV(A) Page 9
<b>CPUC Fire Threat Map Adjustments</b>	<b>PUC § 8387(b)(2)(K):</b> Identification of any <b>geographic area in the local publicly owned electric utility’s or electrical cooperative’s service territory</b> that is a higher wildfire threat than is identified in a commission fire threat map, and identification of where the commission should expand a high fire threat district based on new information or changes to the environment.	Section IV Page 10
<b>Enterprisewide Risks</b>	<b>PUC § 8387(b)(2)(L):</b> A methodology for identifying and presenting <b>enterprisewide</b> safety risk and wildfire-related risk.	Section IV Page 9
<b>Restoration of Service</b>	<b>PUC § 8387(b)(2)(M):</b> A statement of how the local publicly owned electric utility or electrical cooperative will <b>restore service after a wildfire.</b>	Section VI Page 17
<b>Monitor and Audit</b>	<b>PUC § 8387(b)(2)(N):</b> A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following  (i) <b>Monitor and audit</b> the implementation of the wildfire mitigation plan.	Section VII Page 19

	<p>(ii) <b>Identify any deficiencies</b> in the wildfire mitigation plan or its implementation, and correct those deficiencies.</p> <p>(iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules.</p>	
<b>Qualified Independent Evaluator</b>	<p><b>PUC § 8387(c):</b> The local publicly owned electric utility or electrical cooperative shall contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on the Internet Web site of the local publicly owned electric utility or electrical cooperative, and shall present the report at a public meeting of the local publicly owned electric utility’s or electrical cooperative’s governing board.</p>	<p>Section VIII Page 21</p>

**IV. WSAB GUIDANCE ADVISORY OPINION RECOMMENDATIONS**

The WSAB Guidance Advisory Opinion identifies 14 specific recommendations that POU’s are requested to address in their 2021 WMPs. As specified in Public Utilities Code § 8387(b)(1), each POU is required to perform a comprehensive revision to the POU’s WMP at least once every three years. Pursuant to this guidance, the POU’s will be updating their WMPs based on the direction of their local governing boards within this 3-year cycle. Because the WSAB’s recommendations have been provided after the initial WMP submission, the POU’s will have varying capacities to fully address each recommendation in their 2021 WMP. This Section IV restates each of the WSAB recommendations and provides an opportunity for each POU to do one or more of the following: (1) provide a narrative response to the recommendation; (2) provide a cross reference to where in the POU’s WMP this topic is addressed; (3) describe why the recommendation is not applicable to the POU; or (4) inform the WSAB of the POU’s intent to address the recommendation at the point of the POU’s next comprehensive revision, occurring in either the 2022 or 2023 WMP.

**A. Plan Structure**

**WSAB Recommendation #1:** Provide context-setting information about the POU and provide a simple guide to where the statutory requirements are addressed within the WMP.

**POU Response:** See Sections II and III above.

**WSAB Recommendation #2:** Provide a short description of the POU’s public review and approval (if required) for the WMP. This description may also include a brief explanation of the funding mechanisms for wildfire mitigation efforts.

**POU Response:** Lassen Municipal Utility District collaborates with customers, communities, local and state fire agencies, and local fire safe councils to discuss wildfire concerns and LMUD planning obligations and requirements. Collective input from these stakeholders has been incorporated in the WMP. Annually, the WMP is presented to the LMUD Board of Directors annually for review, input, and approval.

**WSAB Recommendation #3:** Identify where the POU has posted the most recent Independent Evaluator (IE) Report and if your POU plans to enhance future IE reports, please summarize in what ways.

**POU Response:** The Independent Auditor Report is available on the LMUD website. The subject auditor will present the report and findings to the LMUD Board of Directors at a public meeting.

**WSAB Recommendation #4:** Develop, in collaboration with POU industry associations, WMP guidelines for future WMPs, understanding that it may take multiple cycles for POU’s to integrate these recommendations into the WMPs.

**POU Response:** This document is intended to include, as appropriate, responses to the recommendations in the WSAB’s Guidance Advisory Opinion for the POU’s 2021 WMP. This document also represents the combined effort of the POU industry associations to further the development of a template to respond to the WSAB’s Guidance Advisory Opinion in a future reporting WMP cycle.

## B. Customer Impacts

**WSAB Recommendation #5:** Describe the potential impact investor-owned utilities (IOU) public safety power shutoff (PSPS) events could have on POU customers and how the POU manages these impacts. For POU’s that are also balancing authorities, describe the criteria for wildfire related de-energizations. Responses shall only provide aggregated information that does not provide customer-specific information or other potentially sensitive data.

**POU Response:** LMUD’s customers are unlikely to be directly impacted by an IOU PSPS event because LMUD has the ability to separate from the IOU electric grid. In the event of a PG&E Public Safety Power Shutoff due to high wildfire threat conditions LMUD will coordinate with a local power generator (HL Power, a 30 MW Biomass Energy Plant). An agreement between our two companies (known as an Islanding Agreement) allows for

direct servicing of our LMUD customer load by HL Power during an emergency. This islanding process is initiated with notice from PG&E that power supply through the Caribou Transmission line could be shut off. LMUD and HL Power would then coordinate the timing and load considerations for islanding to take place.

**WSAB Recommendation #6:** Describe the utility customer communication plans with respect to wildfires and PSPS, and in particular describe the methods, content and timing used to communicate with the most vulnerable customers, such as Access and Functional Needs (AFN) customers, medical baseline customers, non-English speakers, and those at risk of losing water or telecommunications service.

**POU Response:** The first level of communication with LMUD customers is a text alert system available to all customers that allows for up to the minute information to be provided to customers within the LMUD service territory. LMUD will communicate with all customers in the event action must be taken that affects certain circuits. Generally, LMUD will have the ability to provide power to all circuits through the islanding process with Honey Lake Power, whereby LMUD customers will be directly serviced by Honey Lake Power during an emergency.

LMUD has developed a new website that will be implemented and will be going live on June 30 of 2021. This Website will change text to over 100 languages and will be fully compliant for Access and Functional Needs customers. LMUD will be developing a medical baseline program. With various tracking and communication methods LMUD will be adding to its resources that may be used to reach all customers with targeted communications. Facebook is also a method that LMUD utilizes to communicate with the community served and also has language translation capability.

During high wildfire threat conditions or during actual wildfire events, LMUD will be in communication with all major and critical communications infrastructure customers as well as all residential customers. LMUD will also coordinate with Cal OES, Cal Fire, Lassen County, City of Susanville, Sheriff's Department, CHP, Banner Lassen Medical Center and pertinent Water Supply Districts (Susanville, Westwood, Lake Leavitt, Spalding, and Lake Forest).

## C. The Grid

**WSAB Recommendation #7:** Provide details on each POU's system hardening and grid design programs, including: (1) the goals of the programs and the risk any particular program is



designed to mitigate; (2) approach to PSPS mitigation and prevention; and (3) identify any resource shortages.

**POU Response:** LMUD's system hardening is designed to increase the wildfire resiliency of the system and reduce the likelihood of a utility caused wildfire. The program is designed to mitigate topographic and climatological risk factors known to be the primary risk drivers for wildfire as detailed in the WMP Section IV.

LMUD system hardening includes 1) weather monitoring and associated assignment of four operating conditions based on relevant weather data, 2) design and construction standards that meet or exceed relevant federal, state, and industry standards, 3) vegetation management that meets or exceeds Public Resource Codes 4292 & 4293, GO 95 Rule 35, and GO 95 Appendix E Guidelines to Rule 35, 4) Inspection frequency that meets or exceeds the minimum requirements of CPUC GO 165 and CPUC GO 95 Rule 18, and ensuring that all inspections conducted in the High Fire Threat District are complete by the historic onset of fire season (September 1 annually), 5) workforce training to reduce the likelihood of the ignition of wildfires, 6) reclosing policy based on Red Flag Fire Danger conditions, 7) Deenergization, and 8) equipment changes and modifications, including trip saver fuses and upgrades of the existing SCADA monitoring system.

LMUD intends to implement the aforementioned mitigation measures to avoid the need to preemptively shut off power due to fire threat conditions. LMUD will make a case-by-case decision to change recloser function or relay settings based on weather conditions, input from local fire authorities, ongoing fire activity within the LMUD service territory and California, ability to notify customers, local government, and public officials, and potential impacts to communities and customers.

**WSAB Recommendation #8:** Describe annual visual patrols on potentially impacted circuits and the risks the POU is inspecting for. Describe whether and how system inspections lead to system improvements. Describe line patrols before, during, and/or after a critical fire weather event, such as a Red Flag Warning with strong winds, or following a fire that burned in areas where electric facilities are or could have been impacted.

**POU Response:** Contact of the powerlines by vegetation, specifically trees, represents a risk to the LMUD overhead powerlines. Annual visual patrols are done on foot inspecting for dead, dying, diseased, and/or leaning trees along the LMUD system. Vegetation growing within the mandated clearance distances of the CA Public Resource Code is also inspected, inventoried, and abated, improving the vegetative clearance of the system until the next trim cycle. Should LMUD infrastructure be affected by wildfire,

the subject lines would be deenergized and every potentially affected line inspected prior to reenergization.

**WSAB Recommendation #9:** Describe options considered by POU (including through the joint efforts of the POU associations) to identify previously unidentified risks that could lead to catastrophic wildfires.

The California Municipal Utilities Association (CMUA) will be holding a special meeting of its Wildfire Preparedness, Response, and Recovery Working Group this fall, which will be focused on risk drivers for powerline caused catastrophic wildfires and innovative mitigation options. CMUA plans to invite a broad range of utility staff, state agency staff (including the WSAB), industry experts, and academics to participate in this discussion. As part of this meeting, the working group will discuss unidentified wildfire risk drivers and mitigation measures that could address these risks. Based on the input provided during this meeting, CMUA will produce a publicly available, post-meeting report that summarizes the group's conclusions and recommendations. [POU]'s staff will participate in CMUA's meeting and will discuss any changes that [POU] has made to its operations in response to the conclusions and recommendations of the working group in a future WMP.

#### D. Risk Assessment

**WSAB Recommendation #10:** Describe the particular wildfire risks associated with system design and construction such as topography and location near the HFTD areas of another utility's service territory. Describe any G.O. 95 exempt assets and possible updates to G.O. 95 that could facilitate more resilient utility transmission and distribution assets.

**POU Response:** LMUD's assessment of wildfire risks is discussed in Section IV of LMUD's WMP. The subject section discusses the primary topographical and climatological risk drivers for wildfire, including drought, vegetation type and density, weather, human activities, terrain, access, changing weather patterns, fire history, and proximity of communities.

The following provides responses to specific questions included in the WSAB's 2021 WSAB Guidance Advisory Opinion:

- Are there design or construction issues related to the utility's specific topography or geographic location that the Board should be aware of?

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*POU Response:* The LMUD territory is geographically and topographically diverse, spanning 1900 square miles, requiring significant travel distances to maintain, improve, and restore service.

- How will the utility address risks associated with facilities requiring power that abut a Tier 2 or Tier 3 HFTD?

*POU Response:* Portions of the LMUD service territory are within a Tier 2 HFTD. During high fire threat conditions or during an actual wildfire event, LMUD will be in communication with all major and critical communication and water infrastructure customers. LMUD will coordinate with OES, Cal Fire, Lassen County, City of Susanville, Sheriff's Department, CHP, Banner Lassen Hospital, and all pertinent water supply districts. Should LMUD need to take action that affects certain circuits, affected customers will be serviced directly from Honey Lake Power.

- How does the utility assess its risks associated with system design and construction?

*POU Response:* LMUD assesses risks associated with system design and construction through 1) weather monitoring and assignment of one of four operating conditions based on relevant weather data, 2) foot patrol inspections for compliance with PRC 4292 & 4293, GO 95 Rule 35, GO 95 Rule 35 Appendix E, GO 165, and GO 95 Rule 18.

- What design and construction standards has the POU implemented that go beyond G.O. 95 or other General Order standards related to design and construction?

*POU Response:* The entire LMUD system is built to Grade A heavy construction, the highest standard of GO 95.

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## E. SITUATIONAL AWARENESS TECHNOLOGY

**WSAB Recommendation #11:** Provide context-setting information about the prevailing wind directions and speeds, differentiated by season, along with average weather conditions by season. Describe how and why situational awareness technology is installed, and where on the system. Describe the decision-making process regarding the installation of situational awareness technology, including constraints such as budgets, availability of equipment, knowledge to effectively deploy, or qualified personnel to install and monitor effectively. Identify any other agencies, utilities, or fire professionals that the data from these devices is shared with.

*POU Response:* The LMUD service territory experiences wind patterns normal of the eastern escarpment of the Sierra Nevada characterized by seasonal wind patterns exceeding 10 mph with gusts of 30 mph being common. The prevailing wind pattern is from the southwest, with winter winds averaging 6-8 mph, spring winds 8-20mph,

summer winds 7-15 mph, and fall winds 6-10 mph. Temperatures vary seasonally, with summer high temperature averaging 87 degrees (July), winter average low of 21 (January), rain averaging 16 inches of rain a year and average snowfall of 28 inches a year. The LMUD service territory experiences an average of 245 sunny days per year. Data provided through the National Weather Service's (NWS) weather stations located within the LMUD service territory are reviewed for situation awareness when the NWS issues weather alerts.

## F. VEGETATION MANAGEMENT

**WSAB Recommendation #12:** Describe treatment plans for all types of vegetation associated with utility infrastructure, from the ground to the sky, which includes vegetation above and below electrical lines.

**POU Response:** LMUD's vegetation management program is discussed in Section IV of [POU]'s WMP. The LMUD Vegetation Management Program includes foot patrol of electric lines to inventory vegetation according to the vegetation clearance requirements of Public Resource Codes 4292 and 4293, GO 95 Rule 35, and GO 95 Rule 35 Appendix E. LMUD completed the vegetation management inventory prior to the onset of historic fire season (September 1 annually).

The following provides responses to specific questions included in the WSAB's 2021 WSAB Guidance Advisory Opinion:

- Describe the reasoning behind each treatment plan and the ecological impact of the treatment options chosen.

Vegetation clearance according to PRC 4293, GO 95 Rule 35, and GO 95 Rule 35 Appendix E clears vegetation growing below, adjacent to, and above the electric wires. Vegetation removal is conducted manually on an annual basis. This annual minor alteration of vegetation does not present significant ecological impact as the vegetative community is maintained and not impaired or otherwise prevented from its full ecological function.

- Describe how vegetation management in the HFTD or Fire Threat Zones differs from other areas, including within private property and urban landscaping.

Within the HFTD, LMUD performs an evaluation of every tree that has the potential to strike overhead facilities if it were to fail on an annual basis. LMUD performs more frequent and detailed inspections of any such trees, and in instances where dead, dying, diseased, or leaning trees could strike the facilities, will work with the landowner to remove the subject vegetation hazard.

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- Describe any enhanced vegetation management that goes beyond the minimum G.O. 95 standard.

LMUD collaborates with the local fire safe council and large timberland owners within their service district to contribute to hazardous fuel reduction projects that reduce the risk of wildfire damage upon and adjacent to LMUD infrastructure. LMUD routinely contributes labor, equipment, and preventative tree removal for such fuel reduction projects. LMUD also has participated in projects that widen the utility easement beyond the minimum clearances on private and public timberlands.

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- A list of native and non-native species in the POU's Service Territory and describe how treatment methods vary.

Native species within the LMUD service territory include predominately Ponderosa Pine (*Pinus ponderosae*) and sagebrush (*Artemisia tridentata*), with occurrences of Western Juniper (*Juniperus occidentalis*), Bitterbrush (*Purshia tridentata*), Incense Cedar (*Calocedrus decurrens*) White Fir (*Abies concolor*), California Black Oak (*Quercus kelloggii*), and rubber rabbitbrush (*Ericameria nauseosa*). Non-native species are not present at a significant level on any portion of the LMUD system. All vegetation is inventoried and abated should it present a risk to compliance with PRC 4293 and GO 95 standards.

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- Describe how the POU tracks new vegetation growth that occurs in areas that has previously been cleared or treated.

Annual visual inspections of vegetation along the LMUD powerlines and within the utility easement provide for an inventory of vegetation that may need abatement to maintain compliance with PRC 4293 and GO 95 standards.

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**WSAB Recommendation #13:** List the qualifications of any experts relied upon, such as scientific experts in ecology, fire ecology, fire behavior, geology, and meteorology. Specify the level of expertise of the POU staff that manages the contractors performing vegetation management. Describe measures each POU takes to ensure that POU staff and contractors comply with or verify compliance with Cal/OSHA standards on Minimum Approach Distances (MAD)

**POU Response:** LMUD regularly seeks advice from Mark Shaffer and Danielle Bradfield, both CA Registered Professional Foresters, for matters pertaining to compliance with the Public Resource Code and vegetation management. LMUD's tree removal contractor is a Certified Arborist able to identify problematic vegetation and provide guidance to the tree abatement crews. The tree abatement crew is a California Licensed Timber Operator (LTO) with an "A" license, the highest level of licensure offered to LTO's by Cal Fire. LMUD also seeks the input of Fire Management Officers with the Lassen and

Plumas National Forests as needed in regard to the District's general approach vegetation management and anticipated fire behavior.