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United States Forest Service  
Regional Forester  
1220 SW 3rd Avenue  
Portland, OR 97204

*Submitted via Webform:* <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>

**RE: COMMENTS ON THE NORTHWEST FOREST PLAN AMENDMENT #64745**

Golden State Power Cooperative (“GSPC”) respectfully submits these comments in response to the Northwest Forest Plan (“NWFP”) Amendment. GSPC appreciates the U.S. Forest Service (“USFS”) for recognizing the need for amendments and soliciting public input.

GSPC is the trade association representing California’s electric cooperatives and rural electric utilities<sup>1</sup>. Electric cooperatives and rural public utilities are focused on providing affordable, reliable, and safe electric service in remote areas. GSPC members maintain over 5,000 miles of power line and serve an average of less than 5 customers per mile of infrastructure; compared to 34 customers per mile for Investor-Owned Utilities. By nature of our rural service territories, GSPC’s utility members obtain federal special use permits, rights-of-way (ROW) authorizations, and other approvals to construct and maintain electric infrastructure on USFS land. The nature of our service territories, and our local, member-driven structure enables us to empower communities, innovate to meet tomorrow’s energy demands, and be good stewards of the federal land on which we operate. It is important that the USFS utilizes this process to improve, rather than further hinder the operations of rural utilities, and indeed the long-standing partnership between the electric cooperatives and USFS.

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<sup>1</sup> GSPC represents Anza Electric Cooperative, Plumas-Sierra Rural Electric Cooperative, Surprise Valley Electric, and Trinity Public Utility District.

The Bioregional Assessment of Northwest Forests (“BioA”)<sup>2</sup> recognized the importance of managing our national forests under the mandate of multiple use:

“Energy infrastructure, such as transmission and powerlines on national forests and grasslands, contributes to national energy security, improves quality of life, and feeds power to communities. National forests and grasslands in the BioA area support more than 1,700 miles of energy transmission lines that contribute to local communities and regional needs.”

Additionally, it should be noted that there are thousands more miles of sub-transmission and distribution powerlines that traverse the northwest forest area. Maintaining reliable, affordable, and safe electric service is the underpinning of rural economic vitality and wellbeing, and we emphasize that the NWFP Amendment must ensure utility rights-of-way continue unhindered.

One of the drivers for this Amendment is the urgent need to address wildfire risk to communities and ecosystems. We understand the areas within the Northwest Forest Plan (NWFP) contain important habitat that we also want to protect. After all, these are the forests in which we live and recreate, and we have seen the impact of catastrophic wildfire. We reiterate our support for fuels reduction projects to protect our Forests, our communities, and our infrastructure. Efforts to prevent and mitigate the impact of wildfires- regardless of cause- should be a primary focus in the NWFP Amendment.

GSPC encourages USFS to utilize this amendment process to ease, rather than further complicate, the processes by which we manage vegetation and perform maintenance of our electric infrastructure; and to make permitting procedures for those processes more straightforward and efficient. This is particularly critical in northern California, where threat of wildfire is high, and where utilities are held to strict liability standards.

We concur with the Bioregional Assessment of Northwest Forests that “Land management plans need to better address strategic wildfire-risk mitigation in and around communities and in the wildland-urban interface.” We further contend that land management and strategic wildfire-risk

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<sup>2</sup> Bioregional Assessment of Northwest Forests (2020), pg. 16

mitigation should be expanded to also include buffers around critical infrastructure, such as powerlines and telecommunications sites. This strategic focus on rural communities and the infrastructure that serves them will mitigate ignition risk, improve resiliency of these communities, aid in wildland firefighting, and protect forest habitat. The existing Northwest Forest Plan severely limits the allowed vegetation disturbance within riparian corridors. While we understand the need to minimize disturbances in riparian corridors, the NWFP Amendment should consider permitting removal of trees that are at risk of tree-to-line contact. We acknowledge there are competing priorities within riparian corridors, but mitigating wildfire risk is a shared objective.

Further, recognizing the increased risk of wildfire to our Northwest National Forests, we urge you to consider *expanding* rights-of-way for public utilities through areas designated as northern spotted owl habitat to reduce the potential for tree-to-line contact. ROW expansion would allow broader corridors for vegetation management, which would decrease the risk of standing trees outside our ROWs falling into energized electrical lines.

There is broad bipartisan agreement that the environmental review and permitting processes must be significantly accelerated to support the modernization of our nation's electric infrastructure, facilitate clean energy development, utilize infrastructure funding, address increased demand from transportation electrification, and to mitigate the risk of wildfire. The Administration's recent amendments to NEPA that were included in Section 321 of the Fiscal Responsibility Act ("FRA")<sup>3</sup> were a step in the right direction, and we hope the NWFP Amendment will coordinate with efforts to streamline the process to efficiently reach our collective energy goals.

GSPC appreciates the opportunity to share our comments. GSPC is a member of the National Rural Electric Cooperative Association ("NRECA") and endorses their comments, filed separately.

Sincerely,



Jessica Nelson  
General Manager  
Golden State Power Cooperative

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<sup>3</sup> Pub. L. No. 118-5, § 321, 137 Stat. 10, 38 (2023).