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Randy Moore, Chief
United States Forest Service
201 14th ST SW
Washington, D.C. 20250-1124

Submitted via Webform: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>

Re: Comments on the U.S. Forest Service Notice of Intent to Prepare Environmental Impact Statement – Land Management Plan Direction for Old Growth Forest Conditions Across National Forest System

Dear Chief Moore,

Flathead Electric Cooperative respectfully submits these comments in response to the U.S. Forest Service (“USFS” of “the Service”) Notice of Intent to (“NOI”) to Prepare Environmental Impact Statement (“EIS”) Regarding Land Management Plan for Old Growth Forest Conditions Across National Forest System.

Flathead Electric Cooperative is the largest electric cooperative in Montana, serving 58,000 members. One-third of the communities we serve are identified as Justice40 disadvantaged communities – many meeting more than one of the qualifying criteria. Our Cooperative’s diverse service area also includes three national forests, most of which are bordered by these underserved communities. Flathead Electric Cooperative works closely with the USFS to be good stewards of our public lands in and around our rights-of-way (ROW), ensuring the reliability and affordability of the electric system we manage.

While we are faced with a significant and growing mass of industry challenges that threaten the resources we rely on to keep electricity affordable and reliable for the members we serve, wildfire risk sits at the top of our list of concerns. Effective right-of-way management and access are critical to maintaining public safety and system reliability and protecting our member-owned utility from unlimited liability – all of which, if not properly addressed, could have a dire impact on the members our Co-op is responsible for serving.

It is important that the USFS recognizes the magnitude of this rulemaking and its potential impacts on all Americans who depend upon a stable, reliable, and affordable supply of electricity to power their daily lives. We are concerned that the short timeframe outlined for this process does not allow sufficient time for the USFS to consider all impacts fully. Any measures that may restrict utility ROW vegetation management, maintenance, access, and grid hardening and expansion; and limitations, prohibitions, or mandates on transmission and distribution line siting or infrastructure should be avoided in this process.

Flathead Electric Cooperative urges the USFS to utilize this EIS and forest plan amendment process to improve, rather than further hinder, electricity generation, transmission, and distribution operations and to enhance the long-standing partnership between co-ops and USFS.

We understand that this land management plan is still in its early stages and still leaves many unanswered questions. We want to take this initial opportunity to encourage the USFS to thoroughly evaluate potential impacts on electricity operations, reliability, and affordability and to prioritize an EIS alternative that mitigates and minimizes negative impacts to electric cooperatives and other utilities that power our nation. Flathead Electric Cooperative supports the comments submitted by the Northwest Public Power Association and National Rural Electric Cooperative Association, and we further encourage the USFS to actively incorporate the considerations raised in those comments into the EIS process.

Sincerely,

Katie Pfennigs, Community Relations Manager

