



Montana Electric Cooperatives' Association

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September 19, 2024

Randy Moore
Chief
United States Forest Service
201 14th Street SW
Washington, DC 20250-1124

Subject: Comments on the U.S. Forest Service Draft Environmental Impact Statement – Land Management Plan Direction for Old Growth Forest Conditions Across National Forest System

Dear Chief Moore,

As Chief Executive Officer of the Montana Electric Cooperatives' Association, representing the 25 member-owned electric cooperatives in the Treasure State, I offer you the following comments on the Draft Environmental Impact Statement (DEIS) regarding land management plan direction for old growth forest conditions.

Although my members appreciate the DEIS states special use authorizations under Section 512 of the Federal Land Policy and Management Act (FLPMA), which provide for operation and maintenance of electricity infrastructure on federal lands, would not be affected, they remain concerned about their ability to implement fire mitigation measures in mature and old growth forests if this issue is not specifically and clearly addressed in the Final EIS. Guideline 1 of the DEIS presents a potential conflict with my members' obligation to manage vegetation along powerlines to mitigate fire risk. The guideline calls for constraining vegetation management projects in areas prioritized for recruitment and development of future old-growth forests, conditions routinely encountered by western Montana electric cooperatives.

Montana's electric cooperatives are also concerned Alternative 2 of the DEIS, if selected, could potentially require them to complete unnecessarily complex and costly documentation for review by a "responsible official" if vegetation management is necessary to mitigate wildfire risk along powerline corridors in areas prioritized for recruitment and development of future old-growth forests. This could

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not only delay or prevent necessary vegetation management projects, but also impact electricity reliability and increase fire risk for homeowners, businesses, and communities. In addition, this language could create a situation where vegetation management projects would be approved only on a case-by-case basis, conflicting with the intent of Section 512 of FLPMA to avoid lengthy processes that delay necessary work that mitigates wildfire risk.

Thank you for your attention to the issues raised in this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gary Wiens", with a stylized flourish extending to the right.

Gary Wiens
Chief Executive Officer