
March 17, 2025

Tom Schultz
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=64745>

Re: Comments on the U.S. Forest Service Draft Forest Plan Amendment Environmental Impact Statement for Regions 5 & 6; California, Oregon, and Washington, EIS No. No. 20240208

Dear Chief Schultz,

The National Rural Electric Cooperative Association (NRECA) respectfully submits these comments in response to the U.S. Forest Service (USFS) Draft Northwest Forest Plan Amendment Environmental Impact Statement (Draft EIS).¹

NRECA shares President Trump's vision of a pro-energy future. We look forward to working with the U.S. Forest Service under your leadership. NRECA has long partnered with the U.S. Department of Agriculture (USDA) and USFS in promoting economic development and higher standards of living in our rural communities; and in fostering the good stewardship of our natural resources and public lands. A well-organized forest plan amendment process with ample opportunity for stakeholder input is critical for understanding the real-world impacts of all potential plan amendment alternatives; and for ultimately creating a forest plan that balances forest health and stakeholder needs.

Because we serve 56% of our nation's landmass, cooperatives necessarily operate on more public lands, forests, and critical habitat than any other type of utility, increasing our risk exposure to events like wildfire and subjecting cooperatives to burdensome and costly government red tape for right-of-way operations and maintenance, and wildfire mitigation activities. Working through bureaucratic challenges within the land management agencies is a key priority for our members and is critical to electric reliability.

America's electric cooperatives comprise a unique sector of the electric industry. NRECA's member cooperatives include 64 generation and transmission (G&T) cooperatives and 832 distribution cooperatives. The G&Ts generate and transmit power to distribution cooperatives that provide it to the end of line cooperative consumer-members.

These not-for-profit entities are independently owned and governed by the people they serve. From growing exurban regions to remote farming communities, electric cooperatives provide power to 42 million Americans across 48 states. They keep the lights on across 56% of the American landscape – areas that are primarily residential and sparsely populated. Those characteristics make it comparatively more expensive for electric

¹ 89 Fed. Reg. 90280 (Nov. 15, 2024).

cooperatives to operate than the rest of the electric sector, which tends to serve more compact, industrialized, and densely populated areas. Because of their unique business model, many cooperatives operate on thin financial margins and any increases in permitting, compliance, and operations costs necessarily are passed to the member-consumer in the form of increased electricity rates.

Electric cooperatives have long worked closely with USFS to be good stewards of our national forests in and around their rights-of-way. We utilize USFS-managed lands to deliver a reliable and affordable supply of electricity to rural communities across the Pacific Northwest. These communities depend upon our nation's public lands for their livelihoods, and they rely upon a well-organized, predictable forest planning process to understand and, importantly, to weigh-in on the management process of lands that belong to the American people, and upon which so much of our success as a nation depends.

The forests encompassed in this rulemaking stretch across three states and include electricity infrastructure and rights-of-way that are critical to electric reliability throughout the entire western region. Because of the vast scope of this Draft EIS and its potential impacts on energy reliability and affordability across an entire region, NRECA encourages the USFS to review, revise, and possibly rescind the Draft EIS to ensure it is consistent with President Trump's pro-energy and timber production priorities.²

A renewed examination by this Administration of the Draft EIS is particularly critical in light of the withdrawal of the proposed USFS Old Growth Timber Rule at the end of the Biden Administration, which prioritized *non-use* of forest lands by stakeholders, including electric cooperatives, and served as the foundation upon which this Draft EIS was scoped and crafted.³ That Proposed Rule would have dramatically constrained electric reliability and use of our national forest system.

Should USFS move forward with finalization, NRECA encourages you to thoroughly evaluate potential impacts on electricity operations in the region and to prioritize an alternative that provides the greatest flexibility for vegetation management and wildfire mitigation. USFS should avoid the restrictive policies described in alternative C, which would further hamper cooperatives' ability to protect their systems and communities from wildfire and other reliability risks. It is important that the USFS utilizes this process to improve, rather than further hinder electric reliability. USFS also may wish to consider reopening the comment period to ensure that all stakeholders have the opportunity to collaborate with the new USFS leadership in this EIS process.

NRECA further encourages USFS to prioritize wildfire mitigation in the region and to utilize a collaborative relationship with cooperatives to further reduce fire risk. This is particularly critical in the Pacific Northwest, where threat of wildfire is high, and where co-ops are held to strict liability standards on forest lands.

Wildfire is a grave threat to electric cooperatives and the communities they serve throughout this region, and yet mitigation efforts have frequently been stymied by USFS's red tape and delays. Cooperatives frequently must wait months or even years for USFS permission to remove even a single hazardous tree, to replace a

² See Exec. Order Nos. 14225, *Immediate Expansion of American Timber Production* (March 1, 2025); 14156, *Declaring a National Energy Emergency* (Jan. 20, 2025); 14154, *Unleashing American Energy* (Jan. 20, 2025); 14192, *Unleashing Prosperity Through Deregulation* (Jan. 31, 2025); and *Regulatory Freeze Pending Review* (Jan. 20, 2025).

³ 90 Fed. Reg. 1945 (Jan. 10, 2025).

wooden pole with a metal pole, and to access their rights-of-way for standard maintenance operations. Implementing categorical exclusions, programmatic National Environmental Policy Act (NEPA) reviews, and similar tools for utility wildfire mitigation activities and right-of-way access across the National Forest System could help expedite this critical work and reduce strain on regional USFS staff.

NRECA further encourages USFS to use available authorities to allow for the removal of felled timber from our rights-of-way across the National Forest System without undergoing timber sales procedures. Cooperatives currently must leave felled timber and vegetation stacked or scattered on the forest floor in and around their rights-of-way, adding to the hazardous fuel load and increasing wildfire risk.

Importantly, NRECA urges USFS to refrain from adding unnecessary complexity, cost, and mandates on electricity infrastructure that may increase electricity rates and chill investment in grid hardening and expansion, at a time of high wildfire risk and increased electrification of the nation.

In addition to the comments contained in this letter, NRECA also incorporates by reference comments that NRECA filed on January 29, 2024 regarding the Notice of Intent to Prepare and EIS, and the January 2025 letter NRECA sent to Secretary Rollins on regarding NRECA's policy priorities.⁴ Both comment letters provide greater detail about NRECA's continuing concerns regarding wildfire, vegetation management, grid hardening and expansion, and maintenance operations in our national forests.

Reliable and affordable electric service is a foundation for rural economic prosperity and development across the Pacific Northwest. Any increased costs or liabilities in the production and distribution of electricity, or any further challenges in vegetation management, grid hardening and wildfire mitigation, or maintenance operations resulting from this forest plan amendment process can impact rates, decrease safety, and have far reaching effects throughout entire communities and regions.

NRECA appreciates the opportunity to inform the USFS on this important Forest Plan Amendment. We welcome the opportunity to discuss our comments and to continue working with you and your team. Please contact Megan Olmstead, Regulatory Affairs Director by telephone at (571) 419-4585 or via email at Megan.Olmstead@nreca.coop if you have any questions regarding these comments.

Respectfully,

Megan A. Olmstead, Esq.
Regulatory Affairs Director
National Rural Electric Cooperative Association

⁴ Letter from Megan A. Olmstead, Regulatory Affairs Director, NRECA to Randy Moore, Chief, U.S. Forest Serv. (Jan. 29, 2024); Letter from Jim Matheson, CEO, Nat'l Rural Electric Cooperative Assoc. to Brooke Rollins, Secretary, U.S. Dep't of Agriculture (Jan. 27, 2025).