

January 6, 2021

Submitted Electronically to Docket No: FS-2020-0013 and via Email

Gregory C. Smith  
Director, Lands and Realty Management  
USDA Forest Service  
1400 Independence Avenue SW  
Washington, DC 20250-1124

Re: Request for Comment Period Extension on the USDA Forest Service Proposed Directive on Operating Plans and Agreements for Powerline Facilities; 85 *Fed. Reg.* 79462 (December 10, 2020)

To Mr. Smith:

The National Rural Electric Cooperative Association (NRECA) respectfully requests that the U.S. Department of Agriculture Forest Service extend the deadline to submit public comments on the proposed directive, *Operating Plans and Agreements for Powerline Facilities*, 85 *Fed. Reg.* 79462 (December 10, 2020). The Forest Service has requested that comments be received by January 11, 2021. NRECA requests that the deadline be extended by 45-days, through and including February 25, 2021.

NRECA is the national trade association representing nearly 900 local electric cooperatives and other rural electric utilities. America's electric cooperatives are owned by the people that they serve and comprise a unique sector of the electric industry. From growing regions to remote farming communities, electric cooperatives power one in eight Americans and serve as engines of economic development for 42 million Americans across 56 percent of the nation's landscape.

Electric cooperatives operate at cost and without a profit incentive. NRECA's member cooperatives include 62 generation and transmission (G&T) cooperatives and 831 distribution cooperatives. All but three of these co-ops are small business entities as classified by the Small Business Administration. The G&Ts generate and transmit power to distribution cooperatives that provide it to the end of line co-op consumer-members. Collectively, cooperatives own and maintain 2.6 million miles or 42 percent of the nation's electric distribution lines. Both G&T and distribution cooperatives share an obligation to serve their members by providing safe, reliable, and affordable electric service.

NRECA members from coast to coast own and operate electric facilities, including distribution and transmission powerlines, substations, access roads, and other related infrastructure on National Forest System (NFS) lands. Thus, NRECA members must acquire special use authorizations to access powerline facility rights-of-way (ROW), as well as complete necessary facility inspection, vegetation management, and operation and maintenance (O&M) activities. These routine and non-routine or emergency activities are a key part of ensuring the safe and reliable delivery of electric services, as well as mitigating potential wildfire risks. The proposed directive provides guidance for the development, review, and approval of operating plans and agreements that address these activities, within the linear ROW for the powerline facilities and on NFS lands adjacent to either side of the ROW. Accordingly, the proposed directive is important to NRECA and its members, their operations, and public service obligations.

Letter to Mr. Gregory C. Smith

NRECA Request for Comment Period Extension on the Forest Service Proposed Directive

*Operating Plans and Agreements for Powerline Facilities*

January 6, 2021

We believe that additional time for public comment on the proposed directive is warranted for several important reasons. First, the Forest Service has stated that it values public participation and as required by section 512 of the Federal Land Policy and Management Act (FLPMA) and the associated implementing regulations will develop the directive in consultation with electric utility owners and operators. We have long worked collaboratively with the agency to support efforts to help improve the approval process for accessing powerline facilities on NFS lands. This proposed directive takes another positive step towards the long-term, cost-effective, and efficient management of electric facilities and vegetation, including hazard trees, necessary to enhance electric system reliability, promote public safety, protect natural resources, and avoid wildfire hazards. However, NRECA and its members will have to spend a significant amount of time to review and provide useful comments on the standards, criteria, and guidelines proposed for operating plans and agreements. Second, many NRECA members will now be required to develop an operating plan or agreement for the first time and need time to understand the potential complexities, scope, and implications the proposed directive will have on their operations and local communities, if finalized. Third, the current comment period has overlapped with many vacation and holiday schedules, effectively shortening the time in which NRECA can effectively coordinate with its members and industry partners on the proposed directive.

For these reasons, NRECA respectfully requests that the Forest Service extend the comment period for 45-days. This brief delay will allow NRECA and its members to provide more thorough and thoughtful comments on the proposed directive. NRECA further requests that the agency notify stakeholders of its decision regarding the extension as soon as possible.

Thank you for your prompt attention to this important matter.

Sincerely,

A handwritten signature in cursive script that reads "Janelle Lemen".

Janelle Lemen

Regulatory Director, Environmental Policy

National Rural Electric Cooperative Association