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First name: Andrew

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Organization: Arizona Public Service

Title: Manager of Forestry, Fire, and Resource Management

Comments: Dear Ms. Walker:

Arizona Public Service (APS) is Arizona's largest and longest-serving energy provider. We generate clean, reliable, and affordable energy for 2.7 million Arizonans. APS works closely with agencies, tribes, and the public to accomplish our mission and create a sustainable energy future for Arizona. We partner with the five National Forests in our service territory to implement our Integrated Vegetation Management (IVM) program. Rights-of-way are managed to ensure system reliability, mitigate fire risk, and conserve natural and cultural resources.

APS has two concerns about the proposed Land Management Plan. First, USFS completed an initial inventory of mature and old-growth Forests (FS-1215a) in fulfillment of Executive Order 14072, Section 2(b). Old-growth forest locations were not identified in sufficient detail to assess potential interactions with our existing infrastructure. We request that areas of old-growth conditions be identified and communicated to the public as part of the scoping process.

Second, the notification in the Federal Register includes Standards for Management Actions within old-growth forest conditions. Utility vegetation management is not included in the list of allowed proactive stewardship activities. If the plan is implemented as written, utility vegetation management associated with existing infrastructure in old-growth forests would require an exemption by the responsible official in a decision document. In our experience, similar exemptions require significant time and resources from the utility and Forest. The APS IVM program has been analyzed extensively and authorized at the Forest and Regional levels. Utility vegetation management should be added to the list of allowed proactive stewardship activities in old-growth forests (section 2(a)), subject to existing laws and agreements. Forest-level officers will take old-growth conditions into consideration when authorizing future utility vegetation work without requiring a separate decision document.

APS supports the stewardship and preservation of important resources such as old-growth forests. We look forward to continuing to support USFS to sustain the health, diversity, and productivity of the Nation's forests while serving our customers.

Sincerely,

Andrew Rable

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