

October 29, 2018

Submitted via *Federal Register* and Email

Forest Health Service
USDA Forest Service
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Re: Request for Comments on the Renewal with No Revisions of the Pesticide-Use Proposal of the USDA Forest Service; *83 Fed. Reg. 43844* (August 28, 2018)

To Mr. Covell:

The National Rural Electric Cooperative Association (NRECA) submits these comments in response to the request by the USDA Forest Service for public comment on renewing without revision its existing information collection, Pesticide-Use Proposal (*83 Fed. Reg. 43844*) (August 28, 2018).

NRECA is the national service organization for America's electric cooperatives. NRECA represents the interests of the nation's more than 900 rural electric utilities responsible for keeping the lights on for more than 42 million people across 47 states. Electric cooperatives are member-owned, not-for-profit small businesses serving member-consumers facing significant economic challenges, especially in rural areas. They are driven by their purpose to power communities and empower their members to improve their quality of life. Affordable electricity is the lifeblood of the American economy, and for 75 years electric co-ops have been proud to keep the lights on. Given their critical role in providing affordable, reliable, and universally accessible electric service, electric cooperatives are vital to the economic health of the communities they serve.

As part of their vegetation management programs to maintain reliability on their systems, co-ops often have the need to safely apply pesticides. In fact, the appropriate use of pesticides is often the only viable option. Many federal lands are not ideal for mowing or other methods to limit both native and exotic invasive species from taking hold on their systems. In many cases, mowing could actually lead to a higher likelihood of spreading invasive species. In addition, properly applied pesticides could benefit wildlife where native grasses would have an opportunity to flourish and thus offer nesting, bedding, or feeding areas for animals. Pesticide use could also benefit pollinators by encouraging wildflowers and other nectar plants to grow.

Yet in particular many of our members are often prohibited from using pesticides on Forest Service lands, and thus have not had the opportunity to pursue the Pesticide-Use Proposal. We urge the Forest

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Service to provide due consideration to those co-ops that need to use pesticides as it could provide mutual benefits to both Forest Service lands and the co-ops.

In many instances, the co-ops that have pursued a PUP approval on other federal lands, such as those managed by the Bureau of Land Management, were denied or faced significant delays in obtaining approvals. In summary, co-ops have experienced an unnecessarily lengthy and complicated process:

- Six to 14 months to obtain PUP approval while the term of approval is just three years
- Differing levels of review required by staff depending on the field office involved
- When a particular field office does not have the certified staff to complete the PUP, it is routed to another field office to complete the review – adding time to the process
- Requiring signed original PUP form with “wet ink” signatures by the originator and the certified applicator (contractor) that will be completing the herbicide application to start the process

Overall, despite guidelines in place, there are significant inconsistencies in how the PUP process is interpreted and applied among the field offices, leading to a lengthy and inefficient review and approval process.

NRECA appreciates the opportunity to provide comments on the burden of using the Pesticide-Use Proposal. We ask that the USDA Forest Service consider the impacts of the process on America’s electric cooperatives and consider ways to implement changes that would make it simpler for them to obtain PUP approvals. We have members that have never pursued the use of the Pesticide-Use Proposal due to the perceived difficulty in obtaining such authorizations, despite the obvious operational, maintenance, and cost benefits of safe application of pesticides or herbicides as proven by years of use elsewhere on the transmission system. Given the potential positive impact these PUP approvals could have for both the co-ops and federal lands, NRECA urges the USDA Forest Service to act expeditiously to modify the PUP approval process. We welcome an opportunity to discuss our recommendations further with your team.

Sincerely,

Stephanie Crawford

Stephanie Crawford
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