

1 **Northwest Public Power Association**
2 **Resolution 2018-16**
3 **Vegetation Management and Fire Prevention on Rights of Way**

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5 **Background**

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7 Of great concern to the electric utility industry is the timely management of vegetation
8 growing along electric transmission and distribution lines on rights-of-way (ROW) located
9 on federal lands. Proper vegetation management ensures reliable electric service, reduces
10 power-line related wildfires, and safeguards electric infrastructure.

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12 The Bureau of Land Management (BLM) and the U.S. Forest Service (Forest Service)
13 together manage 439.3 million acres throughout the United States containing almost
14 90,000 miles of electrical transmission and distribution rights-of-way. Utility companies, and
15 ultimately their customers, bear the cost of maintaining and repairing these ROWs, and
16 suffer the reliability and financial consequences if they are not allowed timely access to
17 federal lands to manage vegetation. Utilities may be liable for fire damage if vegetation in
18 or near ROWs cause fires when coming into contact with electric lines. Utilities may be
19 liable for fire suppression costs even when federal land managers have denied a utility's
20 request to trim vegetation that ultimately caused the fire. Utilities that are held liable for
21 fire damage costs can be denied future liability insurance.

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23 Unfortunately, BLM and the Forest Service have not allowed vegetation management of
24 ROW to be carried out on a consistent or timely basis. In some cases utilities have found
25 that federal land managers apply inconsistent policies to vegetation management requests.

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27 **NWPPA's Position**

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- 29 • NWPPA supports policies that provide electric utilities with transmission and
30 distribution lines on ROW on federal lands with a reasonable certainty that the
31 approving federal agency will respond in a timely and consistent manner to access and
32 vegetation management requests.
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34 • NWPPA supports legislation or regulations that would provide electric utilities with a
35 sensible framework to manage ROW on federal land in a consistent and reliable
36 manner, allow for procedures to reduce delays in receiving responses to requests,
37 modify rules on liability, and allow for training of federal personnel to ensure
38 consistency in ROW determinations.