



**February 2, 2026**

Comments regarding:

**December 4, 2025 Agency Information Collection Activities; Eagle Take Permits and Fees**

Submitted by:

**Energy and Wildlife Action Coalition**

Filed electronically to the attention of:

Service Information Collection Clearance Officer  
U.S. Fish and Wildlife Service  
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OMB Control No. 1018-0167

The Energy and Wildlife Action Coalition (“EWAC”)<sup>1</sup> submits these comments in connection with the U.S. Fish and Wildlife Service (“USFWS”) December 4, 2025 notice of information collection “Agency Information Collection Activities; Eagle Take Permits and Fees” (“Notice”).<sup>2</sup> In accordance with its obligations under the Paperwork Reduction Act, the Notice seeks input on permit applications for eagle permits under the Bald and Golden Eagle Protection Act (“BGEPA”). EWAC appreciates the opportunity to comment and provides these comments based on the knowledge and experience of its membership. EWAC members most commonly use Form 3-200-71 “Eagle Incidental Take,” Form 3-200—72 “Eagle Nest Take,” and Form 3-200-91 “Eagle Disturbance Take.” These permit application forms are applicable to both general and specific eagle permit applications. EWAC’s comments today solely focus on the application process for the general permit program.

As USFWS is aware, Executive Orders issued by President Trump and Secretarial Orders issued by Secretary of the Interior Burgum have prioritized both the need for domestic electricity generation and the need for streamlined permitting processes. The general permit program provides an efficient and centralized pathway toward compliance, enabling more effective use of government resources while delivering greater regulatory certainty. Having a clear and readily attainable pathway to managing risk under BGEPA is valuable to the energy generation and electric transmission sectors. By reducing administrative burdens and facilitating timely permitting, the general permit program advances two key objectives of this administration: expanding energy generation and promoting an efficient government. The general permit program exemplifies good government by reducing time and cost for both regulated entities and USFWS, and it should serve as a model for other permit programs administered by USFWS. Accordingly, EWAC membership supports the general permit program and appreciates this opportunity to affirm the benefits of the centralized application process and encourage the USFWS to look for areas to further streamline and clarify the process as it continues to administer the program.

The letter today focuses solely on application process considerations. However, to ensure the substantive aspects of the general permit program continue to align with evolving industry practices, technological developments, and safety standards, EWAC encourages USFWS to continue engaging with industry groups on implementation of the program and, most critically, when considering potential changes. This is particularly important for the general permit for power lines, which would benefit from substantive adjustments to better align with industry standards and practices. EWAC looks forward to continuing to work with USFWS in its efforts to improve implementation of BGEPA and would welcome further dialogue.

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<sup>1</sup> EWAC is a national 501(c)(6) trade association formed in 2014 whose members consist of electric utilities, electric transmission providers, and independent power producers, operating throughout the United States, and related trade associations. The fundamental goals of EWAC are to evaluate, develop, and promote sound environmental policies for federally protected wildlife and closely related natural resources while ensuring the continued generation and transmission of reliable and affordable electricity. EWAC supports public policies, based on sound science, that protect wildlife and natural resources in a reasonable, consistent, and cost-effective manner. EWAC is a majority-rules organization and therefore specific decisions made by the EWAC Policy Committee may not always reflect the positions of every member.

<sup>2</sup> 90 Fed. Reg. 55,919 (December 4, 2025).

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