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The Honorable Sonny Perdue
Secretary of Agriculture
1400 Independence Ave, SW
Washington, D.C. 20250

Dear Secretary Perdue,

The National Association of Forest Service Retirees sincerely appreciates your desire to work with our organization to enhance rural prosperity and healthy environments through active land management. Per our discussions, NAFSR work teams have finalized our input and developed recommendations regarding agency culture, Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations, Forest Service Endangered Species Act (ESA) reform, and Forest Service environmental analysis and decision-making (EADM) processes. These documents are being, or have been, submitted to the appropriate agency either informally or through formal public involvement processes, and are being compiled into a single comprehensive report that is available to you and your staff upon request.

This letter summarizes the key concepts presented in those materials and recommends actions that you, in your capacity as Secretary of Agriculture, will likely need to take to overcome the institutional inertia and resistance that often thwart meaningful reform efforts. Based on our collective agency experience, we respectfully offer the following recommendations.

Agency Culture – Gifford Pinchot had a very specific vision for the management of the nation’s forests: the foresighted utilization, preservation and/or renewal of forests, waters, lands and minerals for the greatest good of the greatest number for the longest time. The cornerstone of the organization was a decentralized corps of field-based rangers who were expected to know the land and the people, and to use that knowledge to make decisions consistent with the Forest Service mission.

Due to a variety of factors—extended periods of low morale, endless process, declining budgets, lack of legislative support, push-back against public lands, personnel issues, and, most significantly, the decline in workforce capacity—the culture of the agency has been adversely affected. We cannot overstate the corrosive effects of losing, by some accounts, half of the non-fire workforce over the last 15 years. This is a very complex problem many years in the making; it will take many more years to right-the-course and restore the agency’s status as one of the best agencies in government for which to work.

September 16, 2018

We are pleased that corrective actions are already in progress: The Department and the Forest Service have initiated thoughtful efforts to reform environmental analysis and decision-making processes with the goal of increasing efficiency and accelerating restoration efforts. This is a great place to begin the process of changing agency culture. We strongly encourage you to guide and support those administrative reforms that streamline analysis and restore local decision making. It will be important for you to support the Chief as she works to finalize and implement meaningful change.

Further, it is imperative to restore agency employees' connections to the land they manage and communities they serve. Years of consolidating units and shuttering offices has taken a real toll on the local relationships that once made the Forest Service great. We call upon you to work with the Chief to find alternatives to future consolidations, and to even reverse the trend.

In addition to process reform, you may want to consider a well-orchestrated "Back to our Roots" campaign that emphasizes the expectation employees work to improve the health, diversity, resilience, and productivity of national forests and grasslands; be a good neighbor; and create jobs and economic benefits for the American people. This campaign must have a compelling message and delivery system. It would be most effective if initiated through a series of in-person discussions between you, the Chief, and the National Leadership Council. From there, leadership at all levels must get behind the effort if it is to facilitate meaningful change.

Please understand that we are not asking for a return to Gifford Pinchot's agency, but for a renewed appreciation of, and rededication to, the core values that have guided the agency for over a century. We believe this effort is necessary to restore the Forest Service's status as one of the most successful agencies in government.

Council on Environmental Quality National Environmental Policy Act Regulations -

We strongly urge you to engage with the Administration and decision-makers at CEQ to ensure the ongoing effort to revise NEPA regulations and procedures results in real reform that:

- 1) Includes guidance, based on the 1969 Act, as to what constitutes a "major federal action." The law was intended to apply to "major significant actions."
- 2) Adopts a determination of NEPA adequacy which allows prior NEPA to be used for similar projects with effects/impacts. Allow analysis from past projects to be used in similar environmental reviews.
- 3) Reduces the scope of alternatives that must be formally evaluated. Allow constructive collaborative discussions to narrow the range of options analyzed.
- 4) Clarifies which decisions may be addressed through categorical exclusions. Provide sufficient flexibility for agencies to determine whether a category of activity does not have a significant effect on the human environment.
- 5) Develops an integrated decision-making model. Integrate regulatory processes into the planning process and decision points.

NAFSR believes these five changes to NEPA regulations would be the most effective in improving agency efficiency (for more detailed explanations, consult our full report). We respectfully ask that you stay involved in CEQ's reform effort and work with the Administration and CEQ to ensure these reforms are among those adopted, and that the reforms are fully implemented.

Endangered Species Act Reform – It is critical that the Forest Service take bold steps to reform ESA processes, and that those reforms apply to informal, as well as formal, consultation. After reviewing the Endangered Species Act Task Force Report (May 2, 2018) our organization submitted a comment letter to Interim Chief Vicki Christiansen. The letter highlighted three major suggestions:

- 1) Increase long-term Forest Service authorities. Specifically, NAFSR believes it should be the agency's top priority to obtain authority for agency biologists to make "may affect" and "not likely to adversely affect" determinations.
- 2) Focus on process and program management actions. Items 5 (develop guidance and templates for biological assessments), 6 (increase use of programmatic assessments), and 7 (clarify relationship between ESA effects determinations and "significance" in the context of NEPA) have the potential to save significant time.
- 3) Develop and monitor reasonable consultation goals and deadlines for various situations and projects.

We respectfully request that you support these recommendations. Recognizing that ESA processes are not totally driven by the Forest Service, it will also be critical for you to provide leadership with the Departments of Commerce and Interior to forge agreements necessary to fully implement identified ESA reforms. Specifically, Department-level leadership need to be convened to discuss expanding the authority of Forest Service biologists to make effects determinations. There also needs to be a serious dialogue about risk management. Current processes are largely risk averse, focusing on the short-term impacts of land management activities and largely ignoring potential long-term benefits. We believe it is imperative for regulatory agencies to consider short- and long-term effects of management action and inaction when evaluating projects. Doing so is likely to require the establishment of special regulations under Section 4(d) of the Act.

Environmental Analysis and Decision Making (EADM) – The Forest Service is to be commended for initiating a robust national dialogue about improving the efficiency of environmental analysis and decision making. NAFSR was very involved in roundtable discussions and has provided input to the agency. Key suggestions included:

- 1) Make better and consistent use of existing authorities and policies (Healthy Forest Restoration Act (HFRA), Farm Bill, categorical exclusions, emergency alternative arrangements, stewardship contracting, and landscape-level NEPA).
- 2) Develop alternatives to litigation.
- 3) Modify existing regulations to decrease ambiguity and improve efficiency. Encourage an adaptive management approach to decision making.
- 4) Complete EADM reform, incorporating the massive body of work completed by Regions. Consolidate reforms into a package, implement and institutionalize. Rebuild agency capacity.

The agency is on the precipice of unprecedented reform. Successfully completing and implementing the intertwined CEQ, EADM and ESA reforms is absolutely critical to make significant changes in agency processes and culture. A reversal in personnel trends which returns non-fire personnel to the field in a decentralized manner is also crucial to the agency's success. It will take your personal involvement to see these initiatives through to a timely completion, and then to hold all levels of the agency accountable for their implementation.

The Administration, Department and Forest Service are to be commended for tackling very difficult land management issues. Improving agency processes and culture will take time, but it will happen with your support, involvement and oversight. Please know NAFSR is supporting you every step of the way as we seek to sustain the Forest Service mission while adapting to today's and tomorrow's challenges. Please let us know if you desire further discussion or a copy of our report.

Sincerely,

James L. Caswell

James L. Caswell, Chair
National Association of Forest Service Retirees