



## **Southwestern Regional EADM Partner Roundtable**

**March 21, 2018**

**Albuquerque, NM**

### **OVERVIEW**

#### **WHAT IS THE ENVIRONMENTAL ANALYSIS AND DECISION MAKING CHANGE EFFORT?**

The USDA Forest Service (USFS) has launched an Agency-wide effort to improve processes related to Environmental Analysis and Decision Making (EADM). The goal of the EADM change effort is to increase the health, diversity, resilience, and productivity of National Forests and Grasslands by getting more work done on-the-ground through increases in efficiency and reductions in the cost of EADM processes. The USFS is working internally at all levels of the Agency and with its Partners to thoroughly identify and consider areas of opportunity.

Internally, the Agency has identified a number of impediments to efficient and effective implementation of work on the ground, including lengthy environmental analysis processes, staff training and skill gaps, and workforce issues related to budget constraints and the increasing costs of fire response. As the USFS works to improve EADM, it will continue to follow laws, regulations, and policies and deliver high quality, science-based environmental analysis.

USFS has explored opportunities to improve EADM for over thirty years, and there are compelling reasons to act now:

- An estimated 6,000-plus special use permits await completion nation-wide, a backlog that impacts more than 7,000 businesses and 120,000 jobs.
- Over 80 million acres of National Forest System lands need cost-effective fire and disease risk mitigation.
- The non-fire workforce is at its lowest capacity in years.
- A steady increase in timelines for conducting environmental analysis, with an average of two years for an environmental assessment (EA) and four years for an environmental impact statement (EIS).



The USFS aims to decrease cost and increase the efficiency of EADM processes by 20% by 2019. In working toward this goal, actions may include:

- Training Agency subject-matter experts on contemporary approaches to implementing the National Environmental Policy Act (NEPA) and other environmental laws.
- Reforming compliance policies under NEPA and other laws by expanding use of categorical exclusions (CEs), capitalizing on process efficiencies, and enhancing coordination with other agencies.
- Standardizing approaches and electronic templates for CEs, EAs, and administrative records.

Leaders at all levels of the USFS are fully engaged in this effort and challenging USFS employees to be creative, design new ways to advance the USFS mission and embrace change while maintaining science-based, high-quality analysis that reflects USFS land management responsibilities. To this end, employees were recruited from all USFS levels to form EADM Cadres that are tasked with developing and implementing change efforts in each local USFS unit; within USFS regions, stations, and areas; and at USFS headquarters. The USFS is creating multiple collective learning opportunities to tap into the Cadres' knowledge, expertise, innovative ideas, and networks in support of these changes.

### **REGIONAL PARTNER ROUNDTABLES**

Within the EADM change effort, USFS leadership recognized that partners and the public can offer perspectives and lessons that complement the Agency's internal experiences—leading to greater creativity, cost-savings and capture of talent/capacity. To support this recognition, the USFS asked the National Forest Foundation (NFF) to assist in hosting ten EADM Regional Partner Roundtables across the country in February and March 2018 (see Appendix A for the schedule) with the objective of collecting diverse partner feedback to inform EADM processes on local, regional and national scales.<sup>1</sup> The NFF and USFS worked closely together to plan, coordinate, and facilitate the Roundtables. The NFF was charged with preparing a summary report for each Roundtable as well as one national report that synthesizes themes emerging from partner input at all of the Roundtables. These reports summarize partner-identified challenges and barriers, desired outcomes, and strategies and solutions for effective and efficient EADM processes.



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<sup>1</sup> The National Forest Foundation (NFF) is a Congressionally chartered nonprofit organization dedicated to conserving and restoring National Forests & Grasslands, and supporting Americans in their enjoyment and stewardship of those lands. NFF is non-advocacy and non-partisan, and serves as a neutral convener and facilitator of collaborative groups engaging with Forest Service and also works with local nonprofits and contractors to implement conservation and restoration projects. To learn more, go to [www.nationalforests.org](http://www.nationalforests.org).

The specific purposes of the Regional Partner Roundtables were to:

- Share why changes are important for achieving the USDA Forest Service’s mission
- Identify, discuss, and capture partner perceptions on barriers and solutions
- Explore what roles partners can play moving forward
- Support dialogue to strengthen relationships between partners and the USDA Forest Service
- Explain how partner inputs will be incorporated from the Roundtables and from participation in the formal rulemaking process.

The Roundtables are a major piece of USFS strategy to integrate the public and partners into its EADM effort. The Agency invited representatives of highly-engaged partner organizations, Tribes, governmental entities and the business community to participate in the Roundtables. USFS also requested formal comments from all members of the public in response to an Advanced Notice of Proposed Rulemaking (ANPR) in January 2018 regarding the National Environmental Policy Act, and is working toward issuing a proposed rule in the summer of 2018 for additional comment. The USFS may choose to issue additional ANPRs or draft rules on other aspects of EADM as a result of the EADM change effort.

This report is a summary of activities and themes emerging from the **Southwestern Regional EADM Partner Roundtable**, held in Albuquerque, New Mexico on March 21, 2018.

## **ROUNDTABLE MEETING DESIGN**

The USFS and the NFF hosted the Southwestern Regional EADM Partner Roundtable at the National Indian Programs Training Center. The Southwestern Region (known as R3) developed an invitation list of partners that regularly engage with the USFS in project design; comment formally and informally on policy, process, and projects; and/or bring a depth of understanding about the laws, rules, and regulations under which the USFS operates. The Southwestern Region sent out 76 invitations, and 46 Partners participated. Please refer to Appendix B for a full list of participants.

Roundtable design included context-setting presentations ([click here for presentation](#)), question and answer sessions, and multiple small group discussion opportunities. Presentations were delivered by: Cal Joyner, Regional Forester; Glenn Casamassa, Associate Deputy Chief, National Forest System; Sandy Watts, Deputy Regional Forester; and Rita Skinner, Chief of Staff. The R3 Regional Office EADM Cadre members and WO EADM Core Team Liaisons filled roles as small group discussion facilitators and note-takers engaging in active discussion with partners. The NFF provided neutral facilitation as lead facilitator.

Full-group presentations provided participants with context to support small group discussions that were organized by EADM themes. The regional presentation also summarized input heard at a prior EADM discussion with partners in



November 2017. Note-takers recorded examples of ineffective or inefficient EADM shared by partners and the solutions offered during these discussions, which provided the basis for the EADM Thematic Tables in this report.

R3 also reflected on a roundtable held the day before with Pueblo leaders in New Mexico. USFS heard that “science is more than books, and consultation is more than checking a box.” Tribes want to manage their ancestral lands with the USFS, not have the USFS serve as the sole caretakers, and they see landscapes, not ownership boundaries.



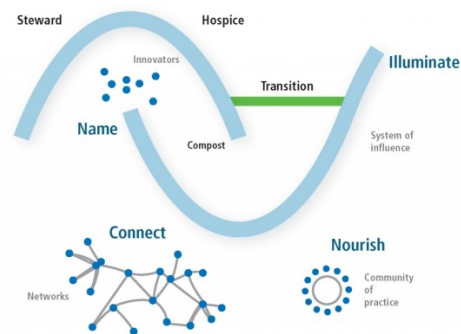
The first facilitated small-group discussion provided participants with an opportunity to share their perceptions of the EADM reform effort. As an introduction to the exercise, the above word cloud was developed from responses to questions on the online registration form, and projected for partners to review for discussion.

Participants answered the following questions with others at their table.

1. *Are we missing anything?*
2. *What opportunities for improvement rise to the top and why? Examples?*
3. *If we had to focus our work to a couple categories, where can we make the most difference?*

USFS employees (national and regional executives, Regional Directors, and/or EADM Cadre members) joined each table’s discussion and actively listened. R3 EADM Cadre members worked with the facilitator at lunch to derive the afternoon small-group discussion topics:

- A. Front-end Collaboration
- B. Adaptive Management
- C. Appropriate Risk
- D. Team Capacity/Composition
- E. Efficiency with Quality



Participants then worked to identify innovative responses to those challenges. Break-out group facilitators asked partners to consider the strategies, tools, and resources needed to make the change needed in EADM processes, as well as the feasibility of implementing the identified strategies.

Participants were prompted to describe additional opportunities for engagement with partners and the public on EADM.

Deputy Regional Forester Sandy Watts closed the day with an explanation of a diagram illustrating the cycle of change for EADM that is reflective of change in living systems. Change happens through emergence, and comes from both top and bottom. Leadership, stewardship, innovation, and trailblazing are roles that move us forward. Blind spots are arrogance and





inability to transition. Champions (like partners in the Roundtable) move the Agency through the process. It is important to connect people to the purpose and process, and nourish community of practice.

## **WHAT PARTNERS SHARED: THEMATIC TABLES OF EADM CHALLENGES AND SOLUTIONS**

Ideas captured in main-session and small-group discussions during the Southwest Regional EADM Partner Roundtable are organized below by top themes.<sup>2</sup> These are presented in the tables below: (1) USFS Culture; (2) USFS Personnel Policies and Staffing Decisions; (3) USFS Capacity and Resources; (4) Forest and Community Collaboration and Partnerships; (5) Analysis Documents and Specialist Reports; (6) Tribal and Interagency Consultations; and (7) Scaling Environmental Assessment and Decision Making.<sup>3</sup> Please see Appendix D for a complete list of acronyms used in the thematic tables.



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<sup>2</sup> The NFF organized information that emerged from all ten of the regional roundtables into major themes and the reports use a similar structure for easy comparison. The themes included in each report respond to the partner discussion at that particular roundtable.

<sup>3</sup> Please note that blanks or incomplete information in the table mean that no ideas were mentioned for that heading during the Roundtable.



## A. USFS CULTURE

The USFS was established in 1905 and since that time has developed cultural norms that guide how the Agency operates and how it relates with its public. The history of remote District Ranger outposts has led to persistent autonomy at the district and forest levels despite changes in technology and current national directives. Both USFS leadership and partners spoke to an inconsistency in practice across the country. Partners described frustration with a lack of communication from the Agency regarding decisions, and a desire to see innovation, risk-taking and effective risk management rewarded and encouraged.

USFS CULTURE CHALLENGES		DESIRED OUTCOMES	USFS CULTURE SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Inconsistencies in EADM practices across the Agency.		EADM policies and methodologies are consistent across units and regions.		
Need for stronger leadership to support EADM change effort at all levels of the Agency.	Employees not feeling supported in making risky decisions. Public concern that USFS will “buck change” and that EADM reform will not transcend change in administrations.	Personnel at all levels of the agency are motivated EADM change-agents. Leaders competently take responsibility for decision making (DM). Partners understand and are comfortable with streamlining efforts.	Encourage greater assertiveness among leaders and foster team-building toward consensus that replaces need for leader-only decisions.	<u>Tools:</u> Training in conflict management and team-building.
Majority of USFS employees are risk averse.	Current DM hierarchy is based on staff position and title. Dis-organized EADM. Fear of backlash from FACA.	Increased innovation and employee morale. Change agents in place that are acceptable within the employee community. Employees (including those at lower ranks) rewarded for taking appropriate risks and innovating.	Prepare for DM needs in emergency situations and in instances of high political sensitivity. Work with stakeholders to define “green (comfort),” orange (mixed degrees of comfort), and “red (needing higher levels of DM) zones.”	<u>Tools:</u> Heat map decision matrices. “Hierarchy tent.” Escalation matrix. Lean Six Sigma “black belt” training. Coaching in collaboration.  <u>Resource:</u> Organizational improvement professional.



CONTINUED   USFS CULTURE				
USFS CULTURE CHALLENGES		DESIRED OUTCOMES	USFS CULTURE SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Perceived risk of being litigated and fear of losing in court. Not learning adequately from past experience.	Slow moving and obstructed EADM processes due to lack of knowledge about what the actual risk is – despite litigation of only 1% of situations.	USFS assesses why perceived risk is high although occurrence of litigation is low. USFS leaders and litigators operate in good faith to make sure EADM documents address the heart of their concerns.	Research case law, review similar proposals and results, and assess whether impact of decisions were local, regional or national in scope.	<u>Tools:</u> Case law. Court decisions. Other agency approaches.  <u>Resources:</u> Legal experts at higher levels of agency.
	Imbalance in understanding the risk of action versus “no action.”	USFS approaches risk with balance of understanding regarding risk of action versus no action in terms of environmental, economic and litigation risks.	Conduct risk analysis to assess cost benefits of action versus no action.	<u>Tools:</u> Matrix to calculate decisions as risk escalates. Level-of-analysis tool measuring cost-benefit.
		Specialists by themselves do not define the risk.	Analyze risk in a collaborative setting. Give active litigators an active role within a collaborative project or consider partner research.	<u>Tool:</u> Template “map” enabling USFS to identify stakeholders based on power and interest levels.
		Risk factors are mitigated early in project development.	Approach potential litigators early to identify issues. Involve project opponents in tasks such as monitoring.	



CONTINUED   USFS CULTURE				
USFS CULTURE CHALLENGES		DESIRED OUTCOMES	USFS CULTURE SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Perceived risk to resources.	Lengthy, overdrawn analyses of impact on resources.		Map areas to prioritize DM based on risk to human health and safety, e.g. forest fires.	<u>Tools:</u> A decision tree to identify depth of analysis and degree of documentation. Outline of legal requirements.
Criticism for taking risk.	Success defined as lack of objections or litigation.		Set new measurements for success. Reward employees for assessing and taking appropriate risk within the legal "grey space."	<u>Tools:</u> Performance evaluation bonus/higher rating for an innovation in taking risks. <u>Resource:</u> Leadership and employee reward system.
Conflicting or overlapping authorities under the law/regulations.	Multiple use mission of USFS leads to facing many conflicting uses.	USFS and Congress recognize the Agency must clearly define priorities and "can't do it all."		





**B. USFS PERSONNEL POLICIES AND STAFFING DECISIONS**

The USFS has a long history of encouraging employees to change positions and move frequently to gain breadth and depth of experience, and to move up in responsibility. Aims of this policy include adequately preparing USFS employees to advance professionally; ensuring employees are able to make unbiased and professional decisions in managing public lands; and enhanced consistency and shared culture across the agency. While moving employees to different units can support a transfer of good practices and new ideas, it also means that employees are in a frequent learning curve to understand the relevant forest conditions, ecological systems, and community interests and dynamics. Often local relationships become fractured and have to be rebuilt, taking time and efficiency from EADM processes and frustrating local partners.

PERSONNEL POLICIES & STAFFING CHALLENGES		DESIRED OUTCOMES	PERSONNEL POLICIES & STAFFING SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Staff hired on Forests are not local and/or do not understand or relate to the local community. Staff transitions are too frequent.	Building partner relationships is challenged when staff come and go in the middle of a process. NEPA delays caused by staff turnover (e.g. Coronado NF travel management).	Staff continuity and smooth staff transitions are a priority for the agency. Succession planning is a standard practice.	Use performance measures to reduce turnover impact on EADM. Hire local (e.g. Gila and Carson NFs). Work with local community colleges and universities (e.g. as Sierra Club does in Arizona). Assess training programs to equip staff with skills to be adaptive when staff gaps occur.	<u>Resources:</u> Partner liaison staff positions with the skill sets needed to communicate openly with partners.
Personnel policies fuel risk-averse EADM.	Line officers (LO) not willing to accept risk; specialists allowed to define risk.	Agency aligned (senior leaders have set expectations for LOs) regarding necessary EADM time and documentation; focus is on “true issues.” LOs empowered to make decisions.	Provide LOs with positive reinforcement for taking risks that benefit the project/USFS. Define real risk versus that calculated in LO training.	<u>Tool:</u> Use Burned Area Emergency Response (BAER) as a model of how to support LOs.



CONTINUED | USFS PERSONNEL POLICIES & STAFFING

PERSONNEL POLICIES & STAFFING CHALLENGES			PERSONNEL POLICIES & STAFFING SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Inadequate or inappropriate IDT capacity and composition.	Unbalanced IDTs mean “pet” resources favored in decisions, justified by voluminous data and analysis.	IDTs are balanced.	Identify who needs to be on the project team prior to initiating a proposed action. Set policy that a Project Initiation Letter is a required component of a project.	<u>Tool</u> : Project Initiation Letter
	Non USFS-knowledge not included in IDT discussions.		Include non-USFS people on IDTs, since regulations indicate that state, tribal and other Federal agency representatives can serve on IDTs.	<u>Resources</u> : Regulatory updates that allow tribes, Non-governmental organizations (NGO) and land-grant heirs to participate in projects.
	IDT member attention divided due to other responsibilities.		Sequester IDT at times when they need to concentrate on their work.	<u>Resource</u> : Off-site location to sequester IDTs.
Appeal meetings lack requisite staff.	It’s like “whack-a-mole” - as soon as one issue is handled, another pops up.	The necessary human resources are in the room on an appeal to efficiently handle issues that arise.	Enable staff to participate in pre-filing (appeal) meetings if requested by the applicant.	



### C. USFS CAPACITY AND RESOURCES

Training in management, resource specializations, and EADM itself remains an unaddressed need throughout the USFS. Budget shortfalls and statutory mandates on funding for fire response combine with a shortage of trained employees in areas other than fire and/or a frequent diversion of staff to fire duty. This situation hampers the ability for the Agency to make progress on stewardship of important forest and grassland resources. Moreover, the complexity of landscape-scale approaches to ecological management of public lands demands a high level of expertise and a deep knowledge of forest conditions at the unit level.

CAPACITY AND RESOURCES CHALLENGES		DESIRED OUTCOMES	CAPACITY AND RESOURCES SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Inadequate staff capacity for EADM.			Improve training in decision process. Increase hiring of staff with DM skills.	<u>Tools</u> : DM training and decision support tools (model: New Mexico Department of Transportation (DOT)).
			Out-source NEPA document development to project proponents (while assuring science used is current and unbiased).	<u>Tools</u> : Diagram of job functions.
Uninformed and inappropriate decision-making due to lack of legal knowledge.	Hesitancy to move forward with projects.		Dismiss or reassign obstructive or non-productive staff.	<u>Tools</u> : Training on NEPA and Council on Environmental Quality (CEQ) regulations.
	Resource specialist bias in prioritizing “pet” resources.			<u>Tool</u> : Resource specialist coaching on EADM process.
	Moving forward non-compliant projects.	Project decisions are made within legal bounds while absorbing risk factors.	Ensure project decisions meet legal requirements.	



CONTINUED   FOREST SERVICE CAPACITY AND RESOURCES				
CAPACITY AND RESOURCES CHALLENGES		DESIRED OUTCOMES	CAPACITY AND RESOURCES SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Shortage in capacity for partner liaison and retention.			Improve recruitment and retention processes and succession planning. Assess training programs to equip staff with skills to be adaptive when staff gaps occur. Identify who can/will make these changes at a leadership level.	<u>Resources</u> : Hiring managers, human resources staff. Training and mentoring in use of science. Partner Human Resource tools.
Lack of monitoring.	NEPA does not require follow up on project impacts or effectiveness.	USFS learns and adapts; uses survey results.	Strengthen, better utilize and communicate assessments, and use assessments to set priorities and to conduct upfront communications.	<u>Tool</u> : After-action reviews (conducted by LOs).  <u>Resources</u> : Partner data.
Inadequate funding for implementation.	Threat that EADM cost savings will be skimmed off for something other than project implementation, where it belongs.		Use cost savings from more efficient EADM for project implementation.	



#### D. COLLABORATION AND PARTNERSHIPS

In the last ten to fifteen years, the USFS has recognized the opportunities offered by the rise of collaborative groups in addressing resource management conflicts and building agreement in project design. Not all units, however, regularly welcome collaboration and partnerships, and stakeholders expressed frustration with an inconsistency in USFS transparency, skill, communications, and use of scientific and traditional knowledge contributed by the public.

COLLABORATION & PARTNERSHIP CHALLENGES		DESIRED OUTCOMES	COLLABORATION & PARTNERSHIP SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Not enough partner collaboration upfront.	Flagstaff Watershed Protection Project, with US Fish and Wildlife Service (FWS) at the table at outset addressing Mexican Spotted Owl and their monitoring.	All parties with an interest in forest management are aware and engaged early in the process.	Make early partner inclusion a mandatory process.	
USFS-partner disputes, confusion, and conflicting agendas that create a power struggle.	Project work hindered by disconnect between USFS and partners. Objection process is often used as a tool of obstruction.	Memorandum of Understandings (MOU) implemented that clearly describe partner roles. Stakeholders seek and achieve concurrence before EADM process begins (e.g. Santa Fe NF Fire-Shed).	Build trust with organizations funding litigation to change their "business model." Develop a MOU template for landscape-scale projects involving multiple types of partners. Recognize that consult-ants/lawyers benefit from extended processes, pursue honest disclosure.	
Stakeholders with dominant voices and influence.	Existence of collaborative group not same thing as true collaboration.	Stakeholder input is diverse and reflective of the community.	Recognize differences between partners in the same or across stakeholder groups.	<u>Tool</u> : Guidance on how to conduct stakeholder analysis.





CONTINUED   COLLABORATION AND PARTNERSHIPS				
COLLABORATION AND PARTNERSHIPS CHALLENGES		DESIRED OUTCOMES	COLLABORATION AND PARTNERSHIPS SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Differences in how partners operate.			Participate in events involving other agencies, tribes, grazing communities, and acequia groups. Provide opportunities for partners to share operational overviews.	<u>Tools:</u> Joint meetings between partners, and between partners and the USFS.
Problem areas in project design identified late in the process. Risk handled late in the NEPA process.	Lack of connection and communication with partners on the front end of EADM. Issues important to partners not identified upfront.	Partners satisfied with EADM processes by being at the table from the outset. Collaborative conversations with partners before starting NEPA. USFS partner liaison remains consistent over time.	Conduct stakeholder engagement early and “map” out concerns that will arise throughout the process. Identify red-flag issues before they become unmanageable. Utilize collaborative processes to identify and mitigate issues.	<u>Tools:</u> Pre-scoping meetings. Update meetings between USFS and partners throughout project development.  <u>Resources:</u> Partners with hands-on project involvement. Resource Advisory Groups for individual land parcels or projects.



CONTINUED   COLLABORATION AND PARTNERSHIPS				
COLLABORATION AND PARTNERSHIPS CHALLENGES		DESIRED OUTCOMES	COLLABORATION AND PARTNERSHIPS SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Public lacks an understanding of how to engage on EADM.		Collaboration works around important dates and times for the local publics, tribes, and groups.	Identify the difference between a “collaborator” and a “stakeholder.” Track users/ partners by type of interest and contact them when their issues arise. Create a sequential EADM diagram with flow of information and human capital to show public where fit in and what resources they need to move to next point.	<u>Tool</u> : Systematic partner engagement process that is kept up to date. Electronic partner Point of Contact (POC) directory (software). Visuals.  <u>Resources</u> : Identified partner liaison (per partner).
Communication pathways inadequately account for language of many constituents.	Changeover in staff on the Tonto NF, Spanish-speaking constituents stopped participating because no meetings were translated in Spanish and no meetings in Spanish-speaking communities. No opportunity for verbal comments in Spanish.		Provide language-appropriate opportunities for engagement on forest plan revisions, including avenues for public comment and participating in public meetings.	



CONTINUED   COLLABORATION AND PARTNERSHIPS				
COLLABORATION AND PARTNERSHIPS CHALLENGES		DESIRED OUTCOMES	COLLABORATION AND PARTNERSHIPS SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Lack of trust.		USFS supports an atmosphere of honesty, fairness and equity in local collaborations. Partners/ collaborators serve as ambassadors for USFS, spreading positive word about Agency's upfront culture, plans and accomplishments.	Build trust among partners (including industry) affected by EADM.	
Concern that EADM reform opens lands to industry in the name of jobs.	1872 Mining Law still applies and favors development.		Manage special use permits to create jobs in all use sectors, including recreation (e.g. outfitters and guides) and infrastructure (e.g. cell phone towers).	



**E. ANALYSIS DOCUMENTS AND SPECIALIST REPORTS**

Federal environmental laws require analysis of the physical, biological, social and economic effects of an action on public lands or waters. Risk aversion and a history of legal challenges to USFS decisions have led to the “bullet-proofing” of environmental analysis documents and specialist reports. Rather than being understandable by the public, documents tend to be extremely long and hard to read. Partners offered suggestions to help streamline documentation and process without sacrificing quality of analysis.

ANALYSIS DOCUMENTS AND SPECIALIST REPORTS CHALLENGES		DESIRED OUTCOMES	ANALYSIS DOCUMENTS AND SPECIAL REPORTS SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Analysis creep.	For two similar projects or special use permits, a hydrologist will interpret one way, and another specialist will interpret another way.		Define what constitutes a good analysis.	
USFS employees comfort with “black-white” situations, less so with “grey.”	DM expect to have 100% of information attainable. Over-analysis on some projects.		Generate strong understanding of what is “enough” information to determine risk level and the triggers for significant actions. Distribute DM authority according to the document: CE, EA. or EIS.	<u>Tool</u> : Process map.
NEPA process is default EADM for USFS.		Stakeholders convene to establish true needs before initiating NEPA.	Empower or require community stakeholders to communicate across boundaries of organizations, local communities, tribes, and agencies before coming to the Forest Service with projects or issues.	<u>Tools</u> : Model of Internal Revenue Service “tax-payer advocates” that serve as a government to public intermediary that can track and share internal changes.



CONTINUED   ANALYSIS DOCUMENTS AND SPECIALIST REPORTS				
ANALYSIS DOCUMENTS AND SPECIALIST REPORTS CHALLENGES		DESIRED OUTCOMES	ANALYSIS DOCUMENTS AND SPECIALIST REPORTS SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
“Reinventing the wheel” syndrome.	Producing new EAs for similar types of projects.		Document and use knowledge attained through approval process for other projects. Make greater use of CEs. Take advantage of Forest Plan EIS, e.g. for fuel reduction.	
Support for decisions not clearly identified.	Lack of standardized structure for documenting decisions and process.			
End-users of documents vary.	Air quality permittee is typically not an NGO.		Recognize and customize response to the end-user. Move process of assessing compliance with other laws (e.g. ESA, NHPA) upfront; identify the critical path for decision-making. Fully analyze the risk, accounting for economic factors and cumulative impacts and usefulness of CEs.	
Documents excessive in length.			Measure qualitative data on length of EADM processes and their outcomes.	<u>Tool</u> : Decision matrix that allows for inclusion of qualitative data.





CONTINUED   ANALYSIS DOCUMENTS AND SPECIALIST REPORTS				
ANALYSIS DOCUMENTS AND SPECIALIST REPORTS CHALLENGES		DESIRED OUTCOMES	ANALYSIS DOCUMENTS AND SPECIAL REPORTS SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Cultural resource work and surveys “grind NEPA to a pulp.”	Juniper removal projects where specialists are calling for a survey over the whole area, even though rubber tired vehicles will be used.	USFS and State Historic Preservation Officer (SHPO) are in agreement regarding what is needed for cultural resource NEPA.	Determine (with SHPO) the correct protocol for cultural resource work/ surveys and apply it consistently and with the backing of upper-level USFS leadership.	
CEs used indiscriminately. CEs set above unit level do not fit needs of the field.	Examples used to describe CEs are taken literally, causing undue analysis.		Focus only on the differences between existing NEPA decisions and the new project.	<u>Tools</u> : Story maps that keep in mind the end user.
CEs should be used more.			Revise CEs as need. Determine the applicable level(s) of CEs. Utilize decades-worth of Findings of No Significant Impact (FONSI) to determine appropriate categories for CEs, and incorporate the FONSI analyses by reference.	<u>Tools</u> : Decision tree. Standard checklist (dropbox style that forces a decision at each step) to determine the applicability of CEs (see model that Federal Housing Administration (FHA) and state DOTs use for CEs).
“Range NEPA” not done efficiently.		NEPA process regarding livestock grazing is efficient.		



## F. TRIBAL AND INTERAGENCY CONSULTATION

Federal laws require multiple agencies to consult with each other about how the fish, wildlife and cultural resources on National Forests and Grasslands could be affected by an action. The USFS also consults and coordinates with Federally-recognized Tribes in a government-to-government relationship. The lack of adequate staffing, complexity of the issues, and inconsistent approaches and coordination has led to lengthy consultation processes.

CONSULTATION CHALLENGE		DESIRED OUTCOMES	CONSULTATION SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Shortchanging government-to-government consultation with a shortened NEPA timeframe.	Once an area of cultural importance is disturbed, it changes forever (cannot be moved elsewhere or replicated).	NEPA process considers cultural impacts and environmental justice, as well as environmental impacts.	Initiate tribal consultation process well in advance of decision-making. Raise level of consultation from specialist to leader-to-leader.	
USFS staff are “socially awkward” when it comes to tribes.	USFS staff turnover restarts relationships with tribes.	Tribal relationship is with the unit instead of the individual.	Have employees spend time on tribal land to learn Pueblo/tribal culture, values, and operations.	<u>Tool</u> : Example of Cochiti Pueblo, which invites the Army Corp to visit the Pueblo and stay in a local home every four years.
USFS not learning from other agencies.			Analyze costs and compare agency (BLM, NPS, USFS) approaches to the NEPA process best and identify best practices.	<u>Tool</u> : Department of Interior review of CEs.



### G. SCALING ENVIRONMENTAL ANALYSIS AND DECISION MAKING

Participants identified a number of issues related to the scale of project analysis, at what level decisions are made, and how local information is or is not reflected in decisions. Partners raised questions about how forest plans and the required large-scale analysis relates to project-level decisions. The discussion also highlighted the challenges of climate change and other cross-boundary issues, and the complexity of natural resource projects.

SCALE CHALLENGES		DESIRED OUTCOMES	SCALE SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Delay when forest decisions pushed up to regional level.			Define roles and responsibilities among the levels of the agency (WO, RO, forest, district).	
Project scale not considered.	Every project gets analyzed at EA or EIS level – “it is just part of the culture.” Line-painting on road used for recreation treated as a NEPA issue.	Levels of NEPA analysis match the intensity of the project under review (e.g. mine versus restoration); all do not require an EIS.	Pilot programmatic (e.g. grazing) project types within regions and share best practices nationally. Recognize that traditional uses (land grants, tribes, non-federally recognized tribes) may not work as pilot projects because of their site-specificity.	<u>Tool</u> : Checklist that provides clear direction on what level (EA vs. EIS) is needed. Landscape teams (e.g. R3 has two teams to relieve burden on districts).
	Level of analysis for 100 acres is the same as 100,000 acres. Groups (e.g. AZ Elk Society) drop out of efforts because there are no small projects to work on.			Take the opportunity to cover multiple jurisdictions (including those of other agencies) with NEPA analysis and incorporate economies of scale.



CONTINUED   SCALING ENVIRONMENTAL ANALYSIS AND DECISION MAKING				
SCALE CHALLENGES		DESIRED OUTCOMES	SCALE SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Projects not tied to the forest plan.		Project debate occurs at the forest plan level. Projects matched with forest plan move ahead quickly.	Make a case for the project that fits the forest plan. Ease the EADM process when a project is consistent with the forest plan.	
Climate change not a factor in DM.		Climate change and other boundary-spanning factors are considered in EADM.		



## **THE EADM CHANGE EFFORT**

EADM Partner Roundtables were held in each USFS region and in Washington, D.C. Information in this regional report, as well as the national report, will be used by USFS leadership to refine business practices, information sharing, policy, and direction toward improved efficiencies. As they are developed, the NFF will post summary reports from all of the Roundtables and a national report that synthesizes the themes heard around the country regarding EADM challenges and solutions ([click here](#)).

The NFF will present information generated at the Roundtables to USFS leadership and the staff teams working nationally and regionally on the EADM change effort.

The USFS will consider the input from the Roundtables as it develops its proposed rule regarding NEPA. The Agency will also review the input received at the Roundtables as it considers other priorities and actions to improve EADM processes, which may involve changes in practices, improved training, altered staffing structures, and/or steps toward improved rulemaking.

## **RESOURCES**

### **SOUTHWEST REGIONAL EADM CADRE**

- Neil Bosworth, Forest Supervisor, Tonto National Forest
- Dawnee Burson, NEPA Specialist, Regional Office
- Angela Dahlby, Wildlife Biologist, Coronado National Forest
- Bob Davis, Director, EAP, Regional Office
- Cliff Dils, Director of Forestry, Regional Office
- Rachelle Huddleston-Lorton, District Ranger, Gila National Forest
- Peggy Luensmann, NEPA Coordinator, Lincoln National Forest
- James Melonas, Forest Supervisor, Santa Fe National Forest
- Cheryl Prewitt, Regional NEPA Coordinator, Cibola National Forest
- Will Reed, Regional Archeologist, Regional Office
- Jennifer Ruyle, Deputy Director, EAP, Coronado National Forest
- Rita Skinner, Chief of Staff, Regional Office
- Art Telles, Staff Officer, Gila National Forest
- Tom Torres, Deputy Forest Supervisor, Tonto National Forest

### **RESOURCES**

- USDA Forest Service EADM webpage – [www.fs.fed.us/managing-land/eadm](http://www.fs.fed.us/managing-land/eadm)
- National Forest Foundation EADM Webpage – [www.nationalforests.org/EADM](http://www.nationalforests.org/EADM)
- USDA Forest Service Directives – [www.fs.fed.us/im/directives/](http://www.fs.fed.us/im/directives/)
- Environmental Policy Act Compliance – [www.federalregister.gov/documents/2018/01/03/2017-28298/national-environmental-policy-act-compliance](http://www.federalregister.gov/documents/2018/01/03/2017-28298/national-environmental-policy-act-compliance)





**APPENDIX A**

<b>Environmental Analysis and Decision Making Regional Partner Roundtable Dates</b>		
<b>Region</b>	<b>Date</b>	<b>Location</b>
<b>1 - Northern</b>	March 14, 2018	Missoula, MT
<b>2 - Rocky Mountain</b>	March 19, 2018	Lakewood, CO (and by video teleconference in Cody, WY; Pagosa Springs, CO; and Rapid City, SD)
<b>3 - Southwestern</b>	March 21, 2018	Albuquerque, NM
<b>4 - Intermountain</b>	March 29, 2018	Salt Lake City, UT
<b>5 - Pacific Southwest</b>	March 27, 2018	Rancho Cordova, CA
<b>6 - Pacific Northwest</b>	February 22-23, 2018	Portland, OR
<b>8 - Southern</b>	March 20, 2018	Chattanooga, TN
<b>9 - Eastern</b>	March 12, 2018	Midewin National Tallgrass Prairie, IL (and 14 Forest Unit locations by video teleconference)
<b>10 - Alaska</b>	March 22, 2018	Juneau, AK
<b>Washington, D.C.</b>	March 14, 2018	Washington, DC



## APPENDIX B

### SOUTHWEST EADM REGIONAL ROUNDTABLE PARTICIPANT LIST

**SUMMARY:** Approximately 76 partner representatives were invited by the Regional Forester to participate in the Roundtable. A total of 46 in-person participants attended the Roundtable in person. The participants represented a broad range of regional forest interests and revealed strong experience with USFS EADM processes.

#### PARTNER PARTICIPANTS

Sergio	Avila	Sierra Club
Jacobo	Baca	New Mexico Land Grant Council
Travis	Beck	SE Group
Kait	Blue-Sky	Cochiti Pueblo
Anne	Bradley	The Nature Conservancy
Patrick	Bray	Arizona Cattlemen's Association
Judy	Calman	New Mexico Wilderness Alliance
Doug	Campbell	PNM
Michael	Casaus	The Wilderness Society
Anthony	Chavez	USDA Farm Service Agency
George	Chavez	New Mexico Association of Conservation Districts
Stephen	Clark	Arizona Elk Society
Patricia	Dominguez	Office of United States Senator Martin Heinrich
Kyle	Dutro	Arizona Game and Fish Department
Deborah	Finch	US Forest Service Rocky Mountain Research Station
Timothy	Franquist	Arizona Department of Environmental Quality
Alicia	Gallegos	US Forest Service
John	Galvan	Pueblo of Jemez
Robert	Garcia	USDA Rural Development
Hannah	Griscom	Arizona Game and Fish Department
Adam	Hawkins	Global External
Patrick	Jackson	Forest Service Retiree
Michele	Jaquez-Ortiz	U.S. Senator Tom Udall
Marlin	Johnson	National Association of Forest Service Retirees
Steve	Kadas	USDA Natural Resources Conservation Service
John	Kelly	Taos Ski Valley
Tim L	Kirkpatrick	East Mountains Interagency Fire Protection Association & New Mexico Prescribed Fire Council
Terry	Klein	SRI Foundation
Randall	Major	New Mexico Cattle Growers
Susan	Millsap	US Fish and Wildlife Service
Tracy	Moore	Arizona Public Service



Scott	Lerich	National Wild Turkey Federation
Raymond	Lucero	Pueblo of Laguna
Corbin	Newman	USFS - Retired
Mariana	Padilla	U.S. Representative Lujan Grisham
Jeff	Pappas	State Historic Preservation Office
Chuck	Paradzick	Salt River Project
Brent	Racher	New Mexico Forest Industry Association
Kent	Reid	NM Forest & Watershed Restoration Institute
Susan	Rich	New Mexico State Forestry
Erik	Schlenker-Goodrich	Western Environmental Law Center
Tom	Teegarden	High Water Mark
Diane	Vosick	Ecological Restoration Institute - Northern Arizona University
Jody	Weil	Bureau of Land Management
Michael	White	USDA – Farm Services Administration
Tremaine	Wilson	FHWA-Arizona Division Office

#### **USDA FOREST SERVICE STAFF**

Glenn	Casamassa	Associate Deputy Chief, National Forest System
Cal	Joyner	Regional Forester
Andrea	Bedell-Loucks	Assistant Director, Ecosystem Management Coordination
Yolynda	Begay	Regional Tribal Relations Program Manager
Dawnee	Burson	NEPA Specialist
Blair	Halbrooks	Assistant Regional Administrative Review Coordinator
Rachelle	Huddleston-Lorton	Deputy Director, EAP
Ericka	Luna	New Mexico State Liaison
Patricia	Mares	Administrative Support Assistant
Adam	Mendonca	Forest Supervisor
Crystal	Merica	Planning Specialist, Washington Office
Cheryl	Prewitt	Regional NEPA Coordinator
Will	Reed	Regional Archeologist
Jennifer	Ruyle	Deputy Director, EAP
Rita	Skinner	Chief of Staff
Roxanne	Turley	Regional Administrative Review Coordinator
Sandy	Watts	Deputy Regional Forester

#### **ROUNDTABLE PLANNING AND IMPLEMENTATION TEAM**

Julie	Anton-Randall	National Forest Foundation - Facilitator
Kayla	Barr	National Forest Foundation



Andrea	Bedell-Loucks	Assistant Director, Ecosystem Management Coordination
Yolynda	Begay	Regional Tribal Relations Program Manager
Dawnee	Burson	NEPA Specialist
Glenn	Casamassa	Associate Deputy Chief, National Forest System
Bob	Davis	Director, EAP
Maia	Enzer	Planning and Public Engagement Advisor
Alicia	Gallegos	District Ranger
Blair	Halbrooks	Assistant Regional Administrative Review Coordinator
Rachelle	Huddleston-Lorton	Deputy Director, EAP
Ben	Irey	National Forest Foundation
Ericka	Luna	New Mexico State Liaison
Patricia	Mares	Administrative Support Assistant
Adam	Mendonca	Forest Supervisor
Crystal	Merica	Planning Specialist, Washington Office
Cheryl	Prewitt	Regional NEPA Coordinator
Will	Reed	Regional Archeologist
Jennifer	Ruyle	Deputy Director, EAP
Rita	Skinner	Chief of Staff
Roxanne	Turley	Regional Administrative Review Coordinator
Sandy	Watts	Deputy Regional Forester
Cynthia	West	Director, Office of Sustainability and Climate



## APPENDIX C

### SOUTHWEST REGIONAL EADM PARTNER ROUNDTABLE AGENDA

March 21, 2018

8:00 am – 4:30 pm

National Indian Programs Training Center

1011 Indian School Rd. NW, Albuquerque, NM 87104

**8:00am Welcome and Introductions**

Environmental Analysis and Decision Making (EADM) Partner Roundtable Objectives – *Cal Joyner, Regional Forester, Forest Service Southwestern Region*

EADM Partner Roundtable Structure & Procedures – *Julie Anton Randall, Facilitator, National Forest Foundation (NFF)*

Introduction Icebreaker

**8:45am Environmental Analysis and Decision Making Overview**

Background and Perspective – *Glenn Casamassa, Associate Deputy Chief, National Forest System and Cal Joyner, Regional Forester*

Open Discussion / Question and Answer Session - *Julie Anton Randall, Facilitator, National Forest Foundation (NFF)*

**10:00am Break and Mingle**

**10:30am Table Discussions on EADM Improvement Opportunities.  
Based on the presentation this morning:**

1. Are we missing anything?
2. What opportunities for improvement rise to the top and why? Examples?
3. If we had to focus our work to a couple categories, where can we make the most difference?

**11:45pm Lunch**

**1:00pm Top EADM Improvement Opportunities in the Southwestern Region  
– Working Groups Session Overview – *Julie Anton Randall, Facilitator,***

**1:15pm Innovating to Meet EADM Improvement Opportunities – Working  
Groups Session One**





1. Potential **strategies** for addressing the identified challenge. What strategies are needed to remove/reduce the barrier?
2. What are some **tools** to implement the strategy proposed?
3. **Who** will need to make changes to achieve the outcome? Role of FS, role of partners.
4. **Feasibility** of implementing strategy (any capacity limitations?).

**2:15pm**      **Break**

**2:30pm**      **Innovating to Meet EADM Improvement Opportunities – Working Groups Session Two**

1. Potential **strategies** for addressing the identified challenge. What strategies are needed to remove/reduce the barrier?
2. What are some **tools** to implement the strategy proposed?
3. **Who** will need to make changes to achieve the outcome? Role of FS, role of partners.
4. **Feasibility** of implementing strategy (any capacity limitations?).

**3:30pm**      **Working Group Report out**

**4:00pm**      **Engaging More Stakeholders on EADM**

**4:15pm**      **Leadership Remarks and Closeout – *Sandy Watts, Deputy Regional Forester***



## APPENDIX D

### List of Acronyms

ANPR	Advance Notice of Proposed Rule-making
ATV	All-Terrain Vehicle
BAER	Burned Area Emergency Response
BIA	Bureau of Indian Affairs
CE	Categorical Exclusion
DNR	Department of Natural Resources
DM	Decision Making
DOT	Department of Transportation
EADM	Environmental Analysis and Decision Making
EA	Environmental Assessment
EIS	Environmental Impact Statement
ESA	Endangered Species Act
FACA	Federal Advisory Committee Act
FHA	Federal Housing Administration
FONSI	Finding of No Significant Impact
IDT	Interdisciplinary Team
LO	Line Officer
M&E	Monitoring and Evaluation
MOU	Memorandum of Understanding
NEPA	National Environmental Policy Act
NF	National Forest
NFF	National Forest Foundation
NHPA	National Historic Preservation Act
NPS	National Park Service
POC	Point of Contact
RO	Regional Office
SHPO	State Historic Preservation Office
SIR	Supplemental Information Review
SUP	Special Use Permit
USDA	United States Department of Agriculture
USFS	United States Forest Service
USFWS	United States Fish & Wildlife Service
WO	Washington Office

