



Improving Environmental Analysis and Decision Making Processes SUMMARY REPORT

Washington Office Partner Roundtable

March 14, 2018

Washington, D.C.

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).

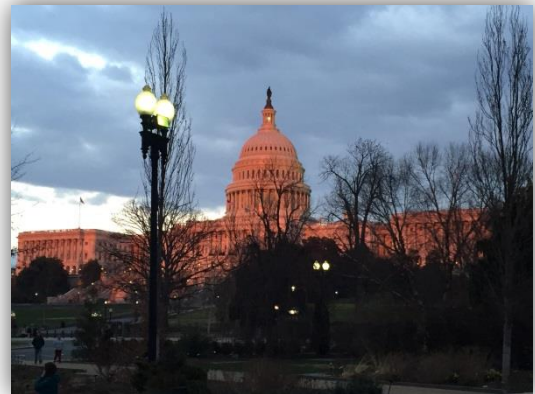
The USFS aims to decrease cost and increase the efficiency of EADM processes by 20% by 2019. In working toward this goal, actions may include:

- 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.¹ The NFF and USFS worked closely together to plan, coordinate, and facilitate these 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.



¹ 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.



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 **Washington Office EADM Partner Roundtable**, held in Washington, D.C. on March 14, 2018.

ROUNDTABLE MEETING DESIGN

The USFS and the NFF hosted the EADM Washington Office Roundtable at the U.S. Department of Agriculture’s Yates Building. The Washington Office (WO) 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 WO sent out 70 invitations, and 30 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 Victoria Christiansen, Interim Chief, and Chris French, Associate Deputy Chief for the National Forest System. Subject matter experts from various WO-EADM Cadres (National Forest System, State & Private Forestry, and Business Operations), were also present throughout the Roundtable to respond to questions and provide greater context to the overall change effort.



The WO had invited several partners to provide some perspectives on EADM challenges and opportunities, and how EADM issues affect their abilities to partner effectively with the USFS. The aim was to prompt active Roundtable participant discussion and to queue up topics for small-group discussions. The panel, moderated by Chris French, consisted of:

- **Geraldine Link**, Director of Public Policy, National Ski Areas Association
- **Bill Imbergamo**, Executive Director, Federal Forest Resource Coalition
- **Peter Nelson**, Director of Federal Lands Program, Defenders of Wildlife

Panelists responded to the following questions (and their responses are captured in the thematic tables below):

- 1) *What do you see as opportunities to make EADM more effective?*
- 2) *What specific actions would you take in the next 100 days to improve EADM?*
- 3) *As a partner, how do you want to be a part of making the change?*
- 4) *What do you think our agency's blind spots are to doing this work well?*

Small Group Discussions – Five breakout topics focused small group discussions:

- **Training and Staff Capacity:** *How can we prepare or equip USFS staff to conduct EADM in ways that enable them to care for the land and serve people more effectively?*
- **Policy:** *How can the USFS reform its policies to improve implementation of the National Environmental Policy Act (NEPA) and other environmental laws?*
- **Research and Science:** *Are there better ways we can utilize research and science to help us assess and improve EADM?*
- **Engagement and Partnerships:** *How can your organization help lead this change with the USFS? How can the USFS partner with you better?*
- **Culture Change:** *How can the USFS work to improve the culture that drives us? This includes building a safe and rewarding workplace for everyone, strengthening the way we develop and implement projects, how we incorporate innovation, and how we work with tribes, partners, and the American people to identify new and better ways to perform work.*

The participants self-selected which topical discussions to join, focusing on barriers to effective and efficient EADM, evidence of the challenges (using resource value and place-based examples), and desired outcomes.

In the second breakout session, the small group discussions focused on generating solutions to EADM challenges (strategies, tools, roles and feasibility) and how the USFS and partners could work together to follow through on ideas. Each small group selected a participant to report discussion points in a fast-paced solution-sharing session.



WHAT PARTNERS SHARED: THEMATIC TABLES OF EADM CHALLENGES AND SOLUTIONS

Ideas captured throughout the day from the main sessions and small group discussions are organized below by eight themes.² These are presented in the tables below: (A) USFS Culture; (B) USFS Personnel Policies and Staffing Decisions; (C) USFS Staff Capacity and Resources; (D) Collaboration and Partnerships; (E) Analysis Documents and Specialist Reports; (F) Tribal and Interagency Consultation; (G) Scale Issues in Environmental Assessment and Decision Making; and (H) Research and Science.³

Please see Appendix D for a list of acronyms.

² 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.

³ 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.

CULTURAL CHALLENGES		DESIRED OUTCOMES	CULTURAL SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Cultural shift away from partnerships toward oversight, regulation and compliance.	Focus on timber management, with sales down because of trying to protect the forests from “bad actors” (i.e. timber theft). Some in the ski industry now view USFS as “regulators.”	USFS is focused more on outcomes and outputs than process.	Find ways to recognize that commercial entities are doing something of value to National Forests (NFs), i.e. encouraging the public to access and value NFs for recreation opportunities. Prioritize recreation among forest uses, relying on economic data to support conclusions.	<u>Tools:</u> Economic indicators of the recreation value of NFs in comparison with other uses; analysis of revenue from recreation fees.
Risk-averse culture.	"Can Do" cultural shift toward fear of "bad actors" and "litigation threat."	USFS staff boldly innovating to generate greater efficiencies.	Provide staff with leadership support so staff are not punished for taking strategically-sound risks. Trust partners and reduce fear of appearing to favor one over another.	<u>Tool:</u> USFS Chief meeting with all line officers. <u>Resources:</u> Travel funds and time.



CONTINUED USFS CULTURE				
CULTURAL CHALLENGES		DESIRED OUTCOMES	CULTURAL SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Inability to regulate behavior change. Cultural change is difficult and takes a long time.	Attempts to regulate employee behavior have varying degrees of impact.	USFS NEPA policy emanates from a place with the most "teeth."	Analyze the appropriate place for USFS NEPA policy: the CFR or USFS Directive System.	<u>Tools:</u> CFR or Forest Service Directive System.
New EADM authorities seen as requiring new partners.	Industry having to wait for "buy-in" from a certain non-profit before receiving a stewardship contract.	Existing/regular partners valued as "customers" of USFS EADM, along with partners that join collaborative opportunities as a result of new authorities.		
Leadership change is a part of cultural change.	Fake policy, e.g. "USFS policy is to only have two CEs per year on each district," which is not true; the number of CEs is a result of limits on what the district can do.		Give line officers enough authority to act.	



CONTINUED USFS CULTURE				
CULTURAL CHALLENGES		DESIRED OUTCOMES	CULTURAL SOLUTIONS	
Barriers	Evidence		Strategies	Tools & Needed Resources
Structural problem of stove-piping program areas, fracturing the agency's "one Forest Service" ethic.	Centralizing Human Resources. AQM allowed to develop own culture.			
	LEI and FAM have developed "brotherhoods." LEI self-dispatches with no coordination with the Line Officer, e.g. in trying to address timber theft.			
Internal workforce environment has allowed for sexual harassment.	Sexual harassment within USFS workforce is particularly evident among fire staff.		Determine if/how fire culture and conditions are different from other USFS program areas. Has moving FAM from the National Forest System to State & Private Forestry had the effect of allowing FAM to develop its own "brotherhood" culture?	
USDA's departmental oversight is unfolding a "wait and see" attitude; lack of communication with partners.	USFS used to roll along even with political changes. Budget concerns. Lack of a permanent USDA Undersecretary for Natural Resources & the Environment.	Field staff are constrained by a fear of saying the wrong thing ("cautious culture" is evolving).	Consider the effect that this "wait and see" attitude is having on partners. Prepare for EADM reform after the next election.	



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
USFS staff turnover and “move on to move up” mentality increases velocity of staff turnover.	While a Forest Plan was being developed, the Forest Supervisor was promoted to another position; the plan was dropped.		Incentivize tenure to produce consistency in EADM, particularly at the Forest level. Promote in place. Manage the timing of moves. Provide short-term assignments.	<u>Tools</u> : New staff orientations (focused on increasing morale). <u>Resources</u> : Cost savings with less relocation and training of replacements. Mentors.
Personnel in acting positions lack the skill set necessary to conduct EADM.	Document inconsistencies emanating from forests.			
Inadequate or missing NEPA compliance monitoring.	Lack of NEPA compliance staff (unlike BLM, which staffs this position).	Monitoring demonstrates that USFS is implementing the mitigations prescribed by EADM.	Rework field staffing to include monitoring compliance. Make sure that the right specialists have monitoring data.	<u>Tool</u> : Data used to justify FONSI.



CONTINUED PERSONNEL POLICIES AND STAFFING DECISIONS				
PERSONNEL POLICIES & STAFFING CHALLENGES		DESIRED OUTCOMES	PERSONNEL POLICIES & STAFFING SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
USFS staffing decisions inconsistent with needs (e.g., planners).	Pay grade levels for planners are lower than they should be.	Place planners in a leadership role, delegating decision-making authority and using pay grade level as an incentive.		



C. USFS STAFF 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.

STAFF CAPACITY AND RESOURCE CHALLENGES		DESIRED OUTCOMES	STAFF CAPACITY AND RESOURCE SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
EADM is short-staffed in terms of both people and expertise.	EADM “burnout.” Resources have to be focused on timber projects.	EADM is energized. EADM teams staffed with the right skill sets and enough talented staff to meet EADM workload.	Establish NEPA planning teams with expertise in multiple areas (e.g. public engagement, NEPA compliance, others). Include expertise in SUPs and effects of/on species, as well as species biology.	<u>Tool:</u> NEPA SWAT team. <u>Resources:</u> Staff position fully dedicated to EADM. Contracted NEPA analyses.
		EADM duties carried out by the parts of the agency with the capacity to perform them.	Give regions the responsibility for EISs.	
Narrow views of EADM teams.		A variety of viewpoints are reflected on an EADM team to enable the most comprehensive analysis.	Train or make adjustments to staff to include analyst capabilities.	<u>Tool:</u> Analysts or training in analysis.



CONTINUED USFS STAFF CAPACITY AND RESOURCES				
STAFF CAPACITY AND RESOURCE CHALLENGES		DESIRED OUTCOMES	STAFF CAPACITY AND RESOURCE SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
USFS takes on too much review. Priorities are not effectively set.	Land management plans are too general.	Fewer but more meaningful projects reviewed and implemented. The appropriate scale of analysis is applied.	Establish programmatic sideboards. Seek efficiencies at the project level.	
Inefficiencies causing strained USFS capacity to conduct NEPA.			Share information that is commonly used to complete NEPA forms and documents.	<u>Tool:</u> E-library of documents accessible by EADM teams.
			Identify and deploy focused types of NEPA (e.g. Special Use Permits).	<u>Resources:</u> Expertise in Special Uses. Revenue earmarked for training that pertains to a specific type of NEPA (e.g. ski area revenue used to train staff on “special uses” NEPA).
Lack of professional development in NEPA.	Inconsistency in documents across Forests. Quality found only in the sub-elements of documents. Staff not current on NEPA law.	Better decisions that inform the public.	Establish budget line items for NEPA training and related travel.	<u>Tool:</u> NEPA training for planners.



CONTINUED USFS STAFF CAPACITY AND RESOURCES				
STAFF CAPACITY AND RESOURCE CHALLENGES		DESIRED OUTCOMES	STAFF CAPACITY AND RESOURCE SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Poor communication tactics and weak communications skill sets within USFS.	No background materials/agenda provided to partners with their invitation to the WO EADM Partner Roundtable; purpose unclear.		Establish strong stakeholder points-of-contact with the right skill set. Be upfront on issues, better coordinate with stakeholders, and engage partners in preliminary EADM to ensure they understand and can act on the purposes and intent of USFS collaborative efforts.	
Monitoring is not utilized as an effective post-management action.	Monitoring is the first thing to go as budgets fall.	Monitoring is consistent and effective, and results are used to inform future decisions.	Demonstrate how monitoring that is used well saves time on future analyses.	<u>Tools:</u> Examples of effective monitoring partnerships. <u>Resources:</u> Partner assistance in monitoring.



D. COLLABORATION & 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
Sustaining partner energy over long decision-making timeframes.	Non-profit organizations lose enthusiasm and interest in EADM over complex multi-year projects.	Partner involvement sustained over the life of projects. Collaboration yields Desired Conditions found in Forest Plans.	Give partners an opportunity to periodically re-visit the operational rules of collaboration to which they have agreed. Communicate exactly what is expected from partners and ensure they can agree to the commitments implied. Rely on partners to help sustain project focus and energy by delegating tasks to them.	
Risk averse behavior and fear of conflict when dealing with partners.	USFS appears to cut off the debate with its stakeholders when partners dissent on USFS activities or plans.	USFS is willing to enter into difficult conversations and avoids setting narrow sideboards for discussion.	Communicate expectations and ensure partners understand and agree to them.	<u>Tool:</u> Training in conflict resolution.
Onerous and complicated pre-decisional objection process.	The average public cannot effectively track the pre-decisional objections process, impeding participation.	Public participating with ease in the pre-decisional objection process.	Create a pre-decisional objection process that the public can easily understand. Avoid rushing to the rule-making process; take advantage of other components of EADM.	



CONTINUED COLLABORATION & PARTNERSHIPS				
COLLABORATION & PARTNERSHIP CHALLENGES		DESIRED OUTCOMES	COLLABORATION & PARTNERSHIP CHALLENGES	
Barriers	Evidence		Strategies	Tools and Needed Resources
Disparity in the scope/scale of partner engagement across USFS units and programs.	USFS not always sure of when it has the “right” and “enough” stakeholders at the table. USFS doesn’t seem to recognize that partners cannot sustain their capacity for protracted and un-focused collaborative/ public meetings. Skill and knowledge gaps due to missing partners (e.g. NGOs, states, and Tribes) when conducting large-scale, landscape-level project planning.	USFS deeply considers the scale of a project or program when deciding what partners to involve, and partners with respect for the time and knowledge of stakeholders.	Use project or program scale to determine which partners (and how many) should be involved in EADM. Involve stakeholders early in the decision-making process, effectively conveying the intent of collaboration and partner expectations. Ensure partners agree to USFS terms of collaboration.	
USFS EADM costly to partners.	Not uncommon for a ski area EIS to cost \$1M (EA can total \$300K; CE can cost \$25K). Ski areas pay for all third-party NEPA costs.			



CONTINUED COLLABORATION & PARTNERSHIPS				
COLLABORATION & PARTNERSHIP CHALLENGES		DESIRED OUTCOMES	COLLABORATION & PARTNERSHIP CHALLENGES	
Barriers	Evidence		Strategies	Tools and Needed Resources
Staff and leadership turnover and transition can lead to mistrust and decrease in the resolution of issues among partners.	Dramatic effects of personnel transfers and transitions. New line officers and/or program staff do not necessarily share the perspectives or values of their predecessors. Staff changes appear based on staff career ambitions rather than project/program needs. Many personnel in “acting” positions. Dissonance as institutional knowledge and the consistency of dialogue with partners is lost with staff change.	The process of partner collaboration is “owned” by multiple parties, enabling it to endure USFS staff changes.	Ensure personnel changes and transitions are strategic in meeting project/program and local community, as well as USFS workforce needs.	<u>Resources:</u> Investment in transition planning.
Not responding to and/or incorporating public input.		USFS demonstrates how it is responding to and incorporating public comments in its decision-making processes.	Focus on areas of agreement to reduce time spent dragged out by disagreement.	



CONTINUED COLLABORATION & PARTNERSHIPS				
COLLABORATION & PARTNERSHIP CHALLENGES		DESIRED OUTCOMES	COLLABORATION & PARTNERSHIP CHALLENGES	
Barriers	Evidence		Strategies	Tools and Needed Resources
Lack of clarity between opportunities for collaboration and formal public comment.		Expectations regarding collaboration are communicated, well-understood, and agreed to between USFS and its partners.	Clarify the respective purposes and differences between collaborative and pre-decisional objection processes. Once formal public comment period has ended, circle back to respondents and let them know if/how their comments were used in EADM. Clarify the true purpose of each scoping exercise, being very deliberate about what USFS seeks from its partners.	<u>Tools:</u> Delineated process of decision-making that distinguishes between formal and collaborative opportunities to provide input and clearly defines the roles of USFS and partners.



E. ANALYSIS DOCUMENTS & 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 & SPECIALIST REPORTS CHALLENGES		DESIRED OUTCOMES	ANALYSIS DOCUMENTS & SPECIALIST REPORTS SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Protracted and extended EADM timelines and missed deadlines.	USFS appears to routinely “blow up” the timelines that it establishes.	USFS sets and adheres to EADM timelines and communicates any timeline to partners.	Set, routinely communicate, and remain committed to tighter EADM timelines to help focus both USFS and public involvement efforts. Identify the major milestones over the life of a project, utilizing partner input and areas of shared accountability for project steps. Minimize significant shifts in project/plan design and collaborative processes, as well as in personnel, over the anticipated life of a project/plan.	<u>Resources:</u> Contracted services to expand a Forest unit’s capacity.
Withdrawal of mitigation efforts.	Current administration undertaking headlong retreat from mitigation based on perception that mitigation was policy proposed	Mitigation efforts are standardized, demonstrating their effectiveness and supporting decisions.	Utilize mitigation policies more often and more effectively, making a cultural adjustment among USFS employees toward mitigation.	



CONTINUED | ANALYSIS DOCUMENTS & SPECIALIST REPORTS

DOCUMENTS & REPORTS CHALLENGES		DESIRED OUTCOMES	DOCUMENTS & REPORTS CHALLENGES	
Barriers	Evidence		Strategies	Tools and Needed Resources
	by the previous administration.			
Fear-based decision making. Repeated processes resulting in the same decisions.	Scope creep – out of fear being accountable if things go wrong. Tree removal on a ski area treated as a full-blown timber sale (approximate cost of \$50,000). Despite holding permits for 40 years, some ski areas endure NEPA/EADM repeated on the same acres. Ski area cannot replace a chair lift without a historic preservation analysis; ski area misses the mountain environment’s short construction window of opportunity to replace the lift.	Decision makers empowered to take unique actions.	Use more CEs to accomplish EADM; avoid defaulting to EISs. Hold USFS accountable to 40 CFR. Consider utilizing Desired Future Conditions more as the basis for decisions. Follow 2012 CEQ guidance that invokes meaningful timelines.	<u>Tools</u> : 40 CFR that tells decision makers to focus analysis and communicate to the public.
Inability for management to be flexible or adapt to changing circumstances.	USFS tendency to lean toward restriction (e.g. in range management, tend to limit, rather than expand, use). Unaddressed need for both hard and soft triggers for sage grouse conservation measures.	Adaptive management built into the NEPA process to provide the public with needed assurances during changing circumstances.	Review NEPA policy and regulations to determine where adaptive management can be built in. Identify hard and soft triggers for all types of activities.	<u>Tool</u> : Monitoring data used to justify FONSI.



CONTINUED | ANALYSIS DOCUMENTS & SPECIALIST REPORTS

DOCUMENTS & REPORTS CHALLENGES		DESIRED OUTCOMES	DOCUMENTS & REPORTS CHALLENGES	
Barriers	Evidence		Strategies	Tools and Needed Resources
Undue length of time to complete analyses that result in restoration.	Forest industry restoration project proposal reviews take an average of 3.5 years. Southwest Jemez Collaborative Forest Landscape Restoration Project (term forest and watershed restoration strategy) approval took 4 years.			
Use of unwieldy EADM documents to connect with and inform the public.	The size and complexity of documents are too difficult for the public to wade through. All types of decisions are treated similarly, producing similar volume and complexity.	Decision-making objectives are transparent and connect to statutory and regulatory requirements. Industry drawn into EADM discussions early enough in the process to avoid bid sales.	Create standards for the presentation of documents that are better suited to general public understanding and response. Shorten EIS timeframe and limit the number of pages. Outline decision criteria in NEPA documents.	<u>Tools:</u> Decision Notice (outlines the rationale for a decision). EIS page limits. EIS production timeline.



F. INTERAGENCY AND TRIBAL 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.

INTERAGENCY AND TRIBAL CONSULTATION CHALLENGES		DESIRED OUTCOMES	INTERAGENCY and TRIBAL CONSULTATION SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Poor communication tactics and weak communications skill sets within USFS.	Given the 373 Indian Nations and their highly variable information needs, inadequate transparency with regard to tribal consultation.		Establish strong stakeholder points-of-contact with the right skill set (e.g. similar to the Office of Tribal Relations, which is well respected within Indian Country and very responsive to the Tribes).	



G. SCALE ISSUES IN ENVIRONMENTAL ASSESSMENT 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
Lack of programmatic analyses and Forest-wide NEPA. Duplicative analyses at forest level.	The USFS Manual and Handbook do not allow for much flexibility.	Large-scale analysis benefits recognized. Programmatic analyses result in program-scale decisions.	Standardize programmatic elements of EAs and EISs. Identify these elements by reviewing previous documents to identify common programmatic threads. Strengthen Purpose and Need statements and ensure they are clear. Reward quality Forest Plans with implementation benefits.	<u>Tools:</u> Model of Aquatic Organism Passage methodology considered approvable for the entire Forest (Cherokee NF and NFs of North Carolina). George Washington & Jefferson NFs' forest-wide fire management program.
			Ensure line officer/program manager/other project staff have the knowledge of local conditions and decision-making skills.	
Failure of analyses to look at big-picture issues in NEPA analyses.	Issues like climate change (e.g. ski areas needing to transition to 4-season land use because of declining snow pack) and invasive pests and diseases not considered.	A more holistic approach to restoration is taken during EADM, rather than being narrow in scope.	Recognize the scale of today's threats to forest health. Consider both the summer and winter realms of ski area NEPA and EADM.	



H. RESEARCH AND SCIENCE

Participants discussed the important role of science and data in EADM processes, and the relationship between research, monitoring and open discussion of science with partners as critical to decision making.

RESEARCH AND SCIENCE CHALLENGES		DESIRED OUTCOMES	RESEARCH AND SCIENCE SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
EADM lacks key science questions and research that could help assess the needed actions and the impact of those actions.	R&D providing scientific review too late in the EADM process.	EADM processes are systematically changed to be better informed by science. R&D is engaged consistently to allow for abstract discussion before NEPA begins.	Develop key science questions to use in EADM that could provide a better understanding of uncertainty. Demonstrate that better decisions are made if informed by science.	<u>Tools:</u> Existing key science questions. Demonstration areas on select Forest units that test the value of formal guidance on how to incorporate science. Guidance on using science in EADM.
Inconsistent application of scientific research in EADM processes.	Scientific information sometimes not used in pre-NEPA processes.	Science consistently informs USFS environmental management decisions.	Routinely apply research findings during the pre-NEPA process. Ensure FONSI's are grounded in science.	<u>Tools:</u> Key research questions, driven by management needs. <u>Resources:</u> Guidance issued on how to use research/findings to mitigate risk and uncertainty associated with management decisions.
Management actions not based enough on defensible and independent science.	Forest managers in the Sierra Nevada are not certain that owls can live with just 30% tree cover, yet thinning is occurring to that degree.	Baseline science driving management actions is defensible and independent.	Make scientific syntheses available to resource specialists and ensure they use them when considering management actions.	<u>Tools:</u> Existing scientific syntheses. <u>Resources:</u> Investments in developing more scientific syntheses.



CONTINUED RESEARCH AND SCIENCE				
RESEARCH AND SCIENCE CHALLENGES		DESIRED OUTCOMES	RESEARCH AND SCIENCE SOLUTIONS	
Barriers	Evidence		Strategies	Tools and Needed Resources
Managers not asking stakeholders questions based in science.	Respecting the independence of science is not always part of working to achieve project goals.	Project managers ask the right questions and carefully consider the answers they receive.	Help managers understand why and how science can help them ask the right questions. Develop best-practices for seeking and using independent science.	<u>Tools:</u> Examples of best practices.
Forest resources at risk from a lack of certainty about which management practices are best/most appropriate for a Forest.	Lack of clarity on which Best Management Practices are most helpful to ensuring forest resilience.	Strong understanding of EADM effects of applying management theories and adaptive management.	Monitor results of decisions to confirm or reject management theories. Ensure planning driven by research factors in risk and uncertainty.	<u>Resources:</u> Partner involvement in monitoring and analysis.
Desired Future Conditions lack adequate modeling.	Purpose and needs statements missing risk considerations.	USFS has developed a better understanding of predicted outcomes.	Improve the way Desired Future Conditions are described and considered in the Forest Plan. Use modeling methods that recognize why the science applied must be objective.	<u>Tools:</u> Methods to perform better modeling / projections. <u>Resources:</u> Projections and futuring research.



THE EADM CHANGE EFFORT

EADM Partner Roundtables were held in each USFS region and in Washington, D.C. Information in this report, as well as the national synthesis report, will be used by USFS leadership to refine business practices, information sharing, policy, and direction toward improved efficiencies in EADM. 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. These future actions may include changes in practice, improved training, altered staffing structures, and/or steps toward improved rulemaking.

RESOURCES

WASHINGTON OFFICE EADM CADRES

- National Forest System Cadre:
 - William Carronero Marcano, National Botanist, Rangeland Management (Cadre Co-Lead)
 - Eric Davis, Assistant Director, Integrated Vegetation Management (Cadre Co-Lead)
- State and Private Forestry:
 - Rick Cooksey, Acting Director, Forest Health Program (Cadre Lead)
- Business Operations:
 - Annie Goode, Assistant Director, Directives & Regulations (Cadre Lead)
 - Nicolas DiProfio, Program Analyst, Business Operations (Cadre Representative)
- Research and Development
 - Toral Patel-Weynand, Director, Sustainable Forest Management Research (Cadre Lead)

WEB LINKS

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



APPENDIX A

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



APPENDIX B

WASHINGTON OFFICE EADM ROUNDTABLE PARTICIPANT LIST

SUMMARY: Approximately 70 partner representatives were invited to participate in the Roundtable. Of these, 30 participated in the Roundtable in person. The participants represented a broad range of interests and revealed strong experience with USFS EADM processes.

PARTNER PARTICIPANTS

John R	Barnwell	Society of American Foresters
Chris	Brown	River Network
David	Brown	America Outdoors Association
Rick	Cables	Vail Resorts
Faith	Campbell	Center for Invasive Species Prevention
Cecilia	Clavet	The Nature Conservancy
David	Cleaves	Cleaves Consulting LLC
Dana Lee	Cole	Hardwood Federation
John R	Culclasure	Congressional Sportsmen's Foundation
Tristan	Daedalus	American Forest Foundation
Cody	Desautel	Intertribal Timber Council
Sam	Evans	Southern Environmental Law Center
Bill	Hodge	Southern Appalachian Wilderness Stewards
Steve	Holmer	American Bird Conservancy
Bill	Imbergamo	Federal Forest Resource Coalition
Christine	Jourdain	American Council of Snowmobile Associations
Lane	Kisonak	Association of Fish and Wildlife Agencies
Ethan	Lane	Public Lands Council & National Cattlemen's Beef Association
Geraldine	Link	National Ski Areas Association
Paulo	Lopes	Center for Biological Diversity
Peter	Nelson	Defenders of Wildlife
Jody	Olson	National Fish and Wildlife Foundation
Jacky	Pata	National Congress of American Indians
Joel	Pedersen	National Wild Turkey Federation
Andrew	Pike	The Pew Charitable Trusts
Paul	Sanford	The Wilderness Society
Gary	Schiff	National Association of State Foresters
Vera	Smith	The Wilderness Society
Rebecca	Turner	American Forests



USDA FOREST SERVICE STAFF - WASHINGTON OFFICE

Victoria	Christiansen	Interim Chief
Chris	French	Associate Deputy Chief, National Forest System
Andrea	Bedell-Loucks	Assistant Director, Ecosystem Management Coordination
Alicia	Bell Sheeter	Program Manager, Office of Tribal Relations
Estelle	Bowman	Assistant Director, Office of Tribal Relations
Rick	Cooksey	Acting Director, Forest Health Program
Eric	Davis	Assistant Director, Integrated Vegetation Management
Nicholas	DiProffio	Program Analyst, Business Operations
Alice	Ewen	Acting Assistant Director, Cooperative Forestry
Samuel	Gaugush	NEPA Specialist, Ecosystem Management Coordination Public Engagement and Collaboration Specialist, Ecosystem Management Coordination
Brad	Kinder	Detail, National Partnership Office
Deidra	McGee	Director, Forest Management Sciences (SFMR)
Toral	Patel-Weynand	Acting Director, Ecosystem Management Coordination
Cecilia	Seesholtz	Assistant Director, Ecosystem Management Coordination
Jim	Smalls	Detail, Ecosystem Management Coordination
Joe	Smith	Assistant Heritage Program Manager
Doug	Stephens	Detail, Ecosystem Management Coordination
David	Tait	Assistant Director, Water, Fish, Wildlife, Air, & Rare Plants
Chris	Worth	

ROUNDTABLE PLANNING AND IMPLEMENTATION TEAM

Julie	Anton Randall	Roundtable Facilitator, National Forest Foundation
Kayla	Barr	National Forest Foundation
Karen	DiBari	National Forest Foundation
Andrea	Bedell-Loucks	Assistant Director, Ecosystem Management Coordination
Estelle	Bowman	Assistant Director, Office of Tribal Relations
Rick	Cooksey	Acting Director, Forest Health Program
Nicholas	DiProffio	Program Analyst, Business Operations
Alice	Ewen	Acting Assistant Director, Cooperative Forestry
Ray	Foote	Exec. Vice President of Development, National Forest Foundation
Chris	Frisbee	National EADM Lead
Ann	Goode	Assistant Director, Office of Regulatory and Management Services



Brad	Kinder	Collaboration Specialist, Ecosystem Management Coordination
Deirdre	McGee	Minerals & Geology Liaison
Toral	Patel-Weynand	Director, Forest Management Sciences
Cecilia	Seesholtz	Acting Director, Ecosystems Management Coordination
Joe	Smith	Detail, Ecosystem Management Coordination
Doug	Stephens	Assistant Heritage Program Manager
David	Tait	Detail, Ecosystem Management Coordination
Chris	Worth	Assistant Director, Water, Fish, Wildlife, Air, & Rare Plants

APPENDIX C

WASHINGTON OFFICE EADM PARTNER ROUNDTABLE AGENDA

Wednesday, March 14, 2018

9:00am	<p>Welcome & Roundtable Overview</p> <p>Welcome and Safety Message – Chris French, Associate Deputy Chief, USDA Forest Service</p> <p>EADM Partner Roundtable Structure & Procedures – Julie Anton Randall, Facilitator, National Forest Foundation (NFF)</p> <p>Participant Introductions - All</p>
9:30am	<p>National Overview of EADM Effort and Open Discussion – Chris French, Associate Deputy Chief, USDA Forest Service</p>
10:30am	<p>Break</p>



- 10:45am Partner Perspective Panel and Dialogue– Moderated by Chris French, Associate Deputy Chief, USDA Forest Service
- Panelists:
- Geraldine Link, Director of Public Policy, National Ski Areas Association
 - Bill Imbergamo, Executive Director, Federal Forest Resource Coalition
 - Peter Nelson, Director of Federal Lands Program, Defenders of Wildlife
- 12:00pm Lunch - On Your Own
- 1:00pm Identifying Challenges Partners Face in EADM – Breakout Session
- 2:00pm Remarks –Victoria Christiansen, Interim Chief, USDA Forest Service
- 2:30pmq Break
- 2:45pm Working Groups on Generating Solutions to EADM Challenges – how we can work together to follow through on ideas?
- 3:45pm Fast-Paced Solution Sharing – Moderated by Julie Anton Randall, Facilitator, NFF
- 4:15pm Concluding Remarks– Chris French, Associate Deputy Chief, USDA Forest Service
- 4:30 pm Adjourn

APPENDIX D

LIST OF ACRONYMS

AQM	Acquisition Management
BLM	Bureau of Land Management
CE	Categorical Exclusion
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EADM	Environmental Analysis and Decision Making
EA	Environmental Assessment
EIS	Environmental Impact Statement
ESA	Endangered Species Act
FAM	Fire and Aviation Management
FONSI	Finding of No Significant Impact
LEI	Law Enforcement and Investigation
NEPA	National Environmental Policy Act



NF	National Forest
NFF	National Forest Foundation
NGO	Non-Governmental Organization
NHPA	National Historic Preservation Act
RO	Regional Office
R&D	Research and Development Deputy Area of USFS
USDA	United States Department of Agriculture
USFS	United States Forest Service
SHPO	State Historic Preservation Office
SWAT	Special Weapons And Tactics
SUP	Special Use Permit
WO	Washington Office

