

Balancing Our Approach

Process Improvements Related to the Four Threats

Efforts to reduce process and address the predicament facing Forest Service employees have produced significant results over the past year. By eliminating or reducing processes that do not contribute to or inform decision making, the Agency has increased its capability to complete work on the ground. However, many of these efforts were initiated prior to the Chief's recognition of the "four threats" to the National Forest System.

The following table depicts the relationship between completed and on-going process improvement actions and the four threats. Each of the status rows is divided into those actions having a direct relationship to the threat (above the dotted line) and those that have indirect application to the threat.

Improvements in process were initially focused on implementation of the National

Fire Plan and assisting in our efforts to respond to the President's Healthy Forests Initiative. It is apparent from reviewing the table that we need to better balance our emphasis on process improvements in relationship to the four threats. At the field level, new tools and methods available to reduce fire risk and address forest health issues are a significant step forward. However, new tools available to address the other three threats are largely by-products of the effort to address fire risk and forest health. Additional ongoing work continues this pattern.

The most significant efforts underway relative to the other threats – revision of Chapter 90 of the Range FSH and the OHV Taskforce will directly help employees address threats resulting from invasive species, un-managed recreation and loss of open space.

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Based upon suggestions from District and Forest employees there are a number of other useful tools that could be developed to either assist employees in directly dealing with threats or that will reduce work that detracts from their capacity to address other threats. Suggestions made include:

ESA Common Sense Actions

While efforts to streamline and improve our consultation process are noteworthy, there are three “common sense” actions that could be taken to make our compliance with ESA more effective:

1. Eliminate the need for consultation on inland aquatic species with both DOI-Fish and Wildlife Service and NOAA-Fisheries.

2. Expand the counterpart regulation concept to all land management activities.
3. Revise and clarify the definitions and descriptions of effects in the DOI/NOAA-Fisheries Consultation Handbook and FSM/FSH direction to be consistent with the concepts in the December 10, 2002 letter regarding the evaluation of net benefits of hazardous fuels treatment projects.

HPA 106 Compliance and Consultation with SHPOs

Compliance with Section 106 requirements of the Historic Preservation Act through consultation with State Historic Preservation Officers (SHPOs) is often raised as a concern in implementing Agency programs.

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The Council is in the process of revising its regulations regarding compliance with Section 106 of the Historic Preservation Act providing opportunities to work with the Council to ensure the final regulations support implementation of the HFRA and efforts to address the four threats.

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	Fire Risk/Forest Health	Invasive Species	Un-Managed Recreation	Loss of Open Space
C	- CEQ Memo		- CE for Ski Area Permits	
O	- Demonstration EA's			
M	- ESA Counterpart Regulations			
P	- ESA Short-term/Long-term risk			
L	- Limited Timber Harvest CE's	- Healthy Forests Restoration Act	- Healthy Forests Restoration Act	- Healthy Forests Restoration Act
E	- Fuel Treatment/Rehab CE's	- 215 Appeal Rule Revision	- 215 Appeal Rule Revision	- 215 Appeal Rule Revision
T		- "Mere Presence" CE Rule	- "Mere Presence" CE Rule	- "Mere Presence" CE Rule
E	- Healthy Forests Restoration Act	- NEPA Primary Purpose Letter	- NEPA Primary Purpose Letter	- NEPA Primary Purpose Letter
D	- 215 Appeal Rule Revision			
	- "Mere Presence" CE Rule			
	- NEPA Primary			

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	Purpose Letter			
O N G O I N G	<ul style="list-style-type: none"> - Revised NFMA Planning Rule - e-SOPA - e-NEPA - “No NEPA Letter” 	<ul style="list-style-type: none"> - Range FSH NEPA Direction - Revised NFMA Planning Rule - e-SOPA - e-NEPA - “No NEPA Letter” - 251 Appeal Rule Revision 	<ul style="list-style-type: none"> - OHV Taskforce - Revised NFMA Planning Rule - e-SOPA - e-NEPA - “No NEPA Letter” - 251 Appeal Rule Revision 	<ul style="list-style-type: none"> - Range FSH NEPA Direction - Revised NFMA Planning Rule - e-SOPA - e-NEPA - “No NEPA Letter” - 251 Appeal Rule Revision
N E		<ul style="list-style-type: none"> - Weed Treatment CE - Range Improv. w/ AMP CE 	<ul style="list-style-type: none"> - Rec. SUP Reissuance CE - Rec. Residences 	<ul style="list-style-type: none"> - Weed Treatment CE - Range Improv. w/ AMP CE

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E D E D	- ESA Common Sense Actions - HPA 106 Compliance/SHPO	- ESA Common Sense Actions - HPA 106 Compliance/SHPO	- Outfitter/Guides - ESA Common Sense Actions - HPA 106 Compliance/SHPO	- Ditch Bill Easement CE - ESA Common Sense Actions - HPA 106 Compliance/SHPO
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Rather than continue our traditional approach to developing project specific findings or developing programmatic agreements with each SHPO, the Forest Service could utilize an approach similar to the BLM in making an effects determinations in consultation with the Council and eliminate the need for SHPO clearance on numerous projects or development of unique programmatic agreements with each SHPO.

Categorical Exclusion for Noxious Weed Treatments

Use herbicides for treatment of noxious weeds in accordance with EPA application guidelines should not require extensive analysis. The EPA’s certification process should be used to support a determination of limited intensity and effect from the use of these chemicals.

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Categorical Exclusion for Range Improvements without an Allotment Management Plan

This category would parallel the existing category for situations where improvements can be made when an AMP does not exist. We should be able to make the case that a CE is appropriate when we have an AMP and supporting NEPA documentation.

Categorical Exclusion for Reissuance of Recreation Special Use Permits

Reissuance of Recreation Residence SUPs by December 31, 2006 is mandated by the Cabin User's Fee Fairness Act regulations. Regions 2 and 5 collectively are spending \$4.2 million for archeological clearance alone for this effort. In Region 4 over 1400 permits will be reissued and will be supported by an Environmental Assessment

or EIS. The actions being taken amount to updating standard terms and conditions and instituting new fee procedures. Permit holders can still challenge permit reissuance using 36 CFR 251, but there are limited and well understood environmental effects associated with the continuance of a use or value-added as a result of additional analysis. Any improvements or actions by the permit holder will be regulated by the terms and conditions of the permit and provide for resource protection through the review and approval process of actions proposed by permit holders.

The same situation applies to Outfitter-Guide permit reissuance. Additional environmental analysis is not warranted nor does it contribute to improved decision making.

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Categorical Exclusion for Ditch Bill **Easements**

If a ditch qualifies under the Act, an easement is to be issued. Extensive environmental analysis contributes little to the decision making process. The Ditch Bill provides little discretion for the Agency in deciding when to issue an easement. A standard set of terms and conditions are required for routine maintenance of improvements. These terms and conditions along with required maintenance plans provide protection for subsequent actions.