



August 6, 2019

NEPA Services Group
 c/o Amy Barker
 USDA Forest Service
 125 South State St., Suite 1705
 Salt Lake City, UT 84138

Dear Ms. Barker:

The National Association State Foresters (NASF) is pleased to provide comments on the proposed rule changes to US Forest Service National Environmental Policy Act (NEPA) Processes as published in the June 13, 2019 Federal Register.

NASF represents the heads of the forestry agencies for all 50 states, the US Territories and the District of Columbia. As such we share in the Forest Service's responsibility for protecting and managing the Nation's forest resources. National Forest System lands are a significant portion of that resource and, in many states have a profound influence on the environmental, social, and economic benefits that forests provide.

Recognizing the importance of federal lands, NASF in 2016 formally adopted a position paper titled "*Preferred Reforms to Federal Forest Land Policy*." One of the desired reforms listed in the paper is quoted below.

"Implement NEPA in ways that are more productive; i.e., 1) utilizing landscape scale planning, or 2) developing desired condition documents with smaller scale projects meeting [Categorical Exclusion (CE)] requirements tiered to those documents, or 3) implement other strategies which produce more on-the-ground results."

We are encouraged to see the proposed rule changes are meant to address NEPA efficiency. We support these changes being incorporated into a new rule that will eventually be followed by new guidance and direction.

Expanding the type of work that can be eligible for CEs should save the agency significant time and funding which is currently expended on administrative procedures. These include CEs for restoration work that is consistent with an approved Land Management Plan, CEs for infrastructure work that can have positive benefits on other resources, and CEs for special uses such as communications sites.

Land Management Plans are, in fact, supported by an Environmental Impact Statement and Record of Decision. They should be sufficient to justify the use of CEs in ways that will increase the pace and scale of vital forest restoration projects. The end result for forests will be improved ecosystem health, greater resilience, and more functional watersheds providing the

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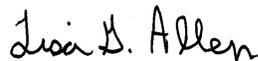
many benefits of clean drinking water for millions of Americans. There is no doubt national forests are seeing larger more intense wildfires. Because of this, the number of non-fire related personnel on national forests has been reduced by nearly forty percent over the last decade and a half. Those staff that remain need this relief from unnecessary and oftentimes duplicative administrative requirements that don't have a meaningful impact on the condition of the resources.

In addition, we note several other changes we feel are improvements over current policy. These include clarification that Environmental Assessments should not be viewed as "mini Environmental Impact Statements." Adding an ability to use a "Determination of NEPA Adequacy" also seems appropriate, as other agencies already apply this process to identify where an existing NEPA assessment can be used for a newly proposed, similar project.

We understand codifying a definition of "Condition Based Management" is simply defining a practice that is already being used, which is to say if certain resource conditions begin to occur, then pre-determined activities have been identified that will be used to address them. We concur with formalizing this sound practice. We also agree with giving local managers more discretion as to what extent they engage the public beyond what is required by the Council on Environmental Quality, allowing managers to engage at a level that is commensurate with public interest.

We recognize other federal laws, such as the Endangered Species Act, the Administrative Procedures Act, and the Historic Preservation Act must still be followed. Notably, all projects will continue to be published in the Forest Service's Schedule of Proposed Actions and available for public review. Therefore, we welcome the proposed revisions, and view them as strategic and necessary changes representing a sensible, long overdue evolution of how the agency carries out its NEPA responsibilities.

Sincerely,

A handwritten signature in black ink that reads "Lisa B. Allen". The signature is written in a cursive, slightly slanted style.

Lisa Allen
Missouri State Forester
NASF President