

Streamlined NEPA and the Payette Forest Coalition

Efficiency and the NFMA Phase

The Payette NF Management Team in 2009 encouraged the PFC to engage in all phases of landscape scale projects, beginning with the NFMA phase. The Coalition has engaged in the development of five landscape scale projects over the past eleven years. Using the PFC document library, Table 1 summarizes the NFMA phase durations for each of the five landscape scale restoration projects. The NFMA durations all occur **prior to the NEPA phase** that Sandee Dingman's slide presentation summarized at the July PFC meeting.

The duration in days was determined by calculating the number of days elapsed between the date of the first PFC or ID Team document in the [project library](#) and the date that the PFC Recommendations Report for the project was submitted to the Forest Service. Note that the durations of the NFMA phase ranged from 209 to 695 days. Adding those durations to the NEPA phase yields an estimate of the total elapsed time (in years) to bring a project to a Record of Decision, starting with the initiation of the NFMA design phase.

Table 1: NFMA Phase Duration by Project

Project	Project Acres	Initiation	Recommendations	NFMA (Days)	NEPA (Days)	Total (Years)
MCCM	51,975	9/1/2009	3/29/2010	209	523	2.01
LCBC 1	80,000	3/24/2011	1/25/2013	673	557	3.37
MFWR	50,000	2/6/2013	8/20/2014	560	1077	4.48
Huckleberry	67,076	9/23/2014	8/18/2016	695	1413	5.78
Granite Meadows	83,000	2/15/2017	10/30/2018	622	TBD	

PFC Engagement in NFMA Phase

Learning from the first of the five projects, Mill Creek-Council Mountain, the PFC adopted by consensus business processes in 2012 for the NFMA project phase (Figure 1), and the NEPA environmental review phase.

It's timely to review and revise the process, now eight years later, given the background presented at the July meeting. For example, the guidance to the PFC in 2009 was that landscape scale projects would lead to a single action by the Responsible Official (Line Officer in the figure): publication of a Notice of Intent to prepare an EIS. District Rangers and the

Forest Supervisor concluded that any landscape scale project, with the scale defined as 50,000 acres or more, would require an EIS to address the complexity of resource restoration actions. The business process currently reflects that guidance in the swim lane diagram that depicts roles and responsibility.

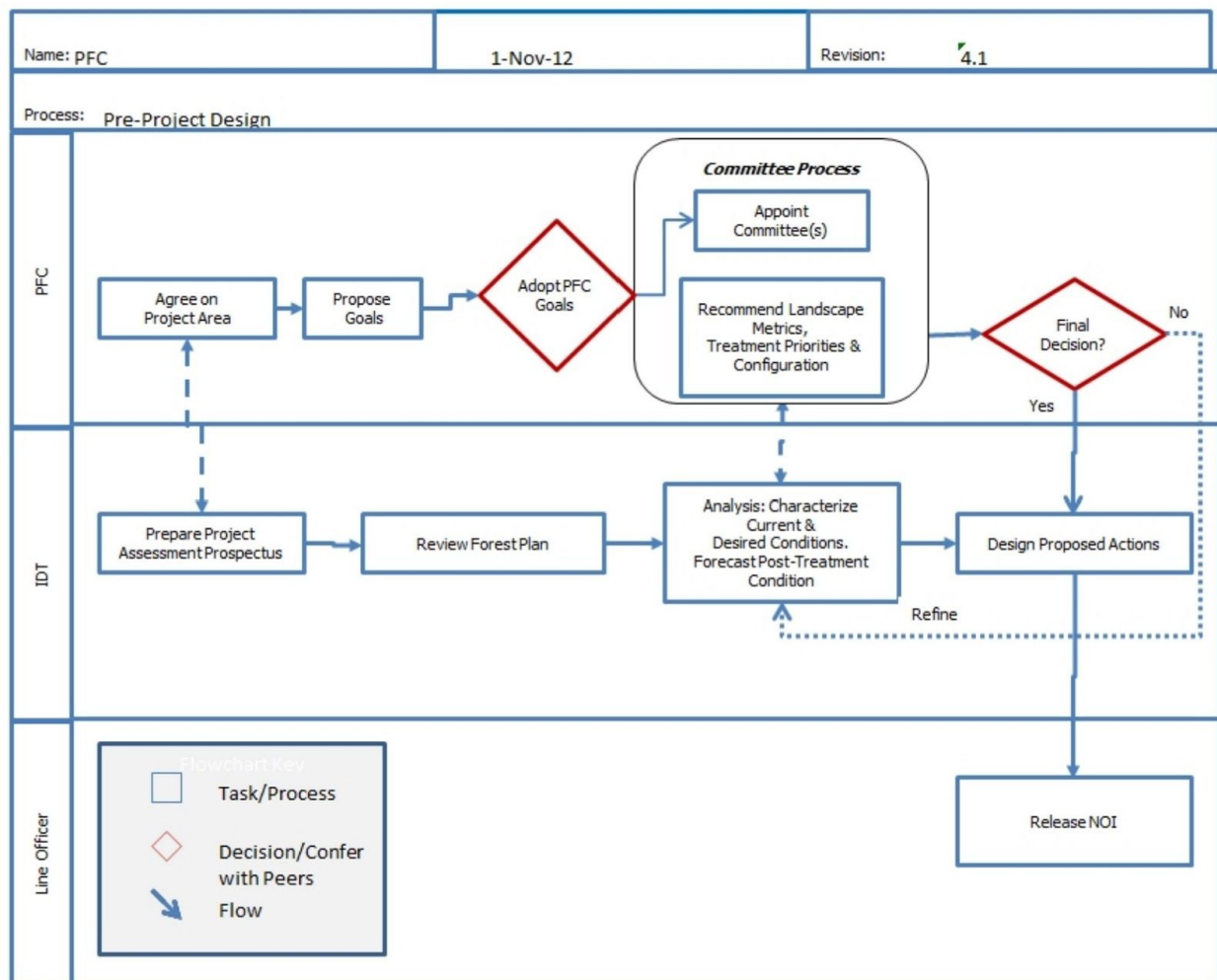


Figure 1: NFMA Phase Business Process

Streamlining the Process

The July PFC meeting presentation by Sandee Dingman included a slide on Strategic Project Design (Figure 2) to shorten the NEPA process. For future restoration projects, a landscape scale NFMA may lead to a portfolio of NEPA projects and not a single action.



Adoption of new regulations

Q = How can we use the new federal regs to shorten NEPA processes?

A = Strategic Project Design (?)

- Landscape-scale pre-NEPA (NFMA)
- Outcome of NFMA is a portfolio of interrelated but focused NEPA projects
 - Sequencing
 - Mitigate risk

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Figure 2: Slide from July Meeting Presentation

The current NFMA business process initiates with an agreement between the ID Team and the PFC on the project boundary. This may be a constructive starting point to revise the business process by reaching an agreement on the “strategic landscape” that would produce a portfolio of interrelated but focused NEPA projects. Second, agree on the likely components of the portfolio. Consider the following to initiate the discussion (i.e., it is not necessarily a solution).

Questions/Comments:

- What is the landscape scale referenced in the Strategic Project Design slide?
 - Idaho Shared Stewardship Priority Landscape
 - WCII-CFLRP Landscape, or
 - The projects delineated in the Appendix of the WCII-CFLRP proposal
- Assuming the strategic landscapes are the project boundaries contained in the WCII-CFLRP proposal, is it fair to conclude that within each of the WCII-CFLRP project boundaries, the most likely portfolio will be a combination of an EIS or EA with individual HFRA authorized Categorical Exclusions (CEs)? If the answer is yes, then below are suggestions to amend the process to improve efficiency.
- **Expand the NFMA business process** to address HFRA CEs that may occur within a WCII-CFLRP project boundary.
 - This issue could be an integral part of the Committee task in the business process diagram, based on a project assessment provided to the PFC by the ID Team.
 - The Committee recommendations would subsequently be reviewed by the PFC, as is the case with all Committee recommendations, in preparation to adopt a Recommendations Report for the landscape scale project area.

- Potential benefit: If the PFC is able to adopt guidelines for HFRA authorized CEs for the landscape, the outcome will eliminate the need for PFC review of each individual CEs at PFC meetings. For example, if the Purpose and Need of the proposed action of the CE is consistent with the overall goals/objectives of the landscape, the Responsible Official would proceed with the publication of a CE scoping announcement. The PFC will be informed of the announcement, but no review would be required.
- The subsequent NEPA phase business process for a HFRA authorized CE could be streamlined to be a summary presentation for informational purposes at a PFC monthly meeting.

- **Project Management Tools**

- A project management consideration is the competing demand for limited resources. By limited resources I mean the time of both the ID Team Resource Specialists and the PFC members.
- It would be counterproductive to increase the NEPA phase duration of landscape scale restoration projects because resources are diverted to the HFRA scale CEs in the portfolio for that landscape..
- The pilot testing of the Project Management tools on the Payette should help optimally use the resources of all parties to ensure that efficient progress on landscape scale restoration activities is not sacrificed by allocating scarce resources to HFRA CEs.

For Reference -

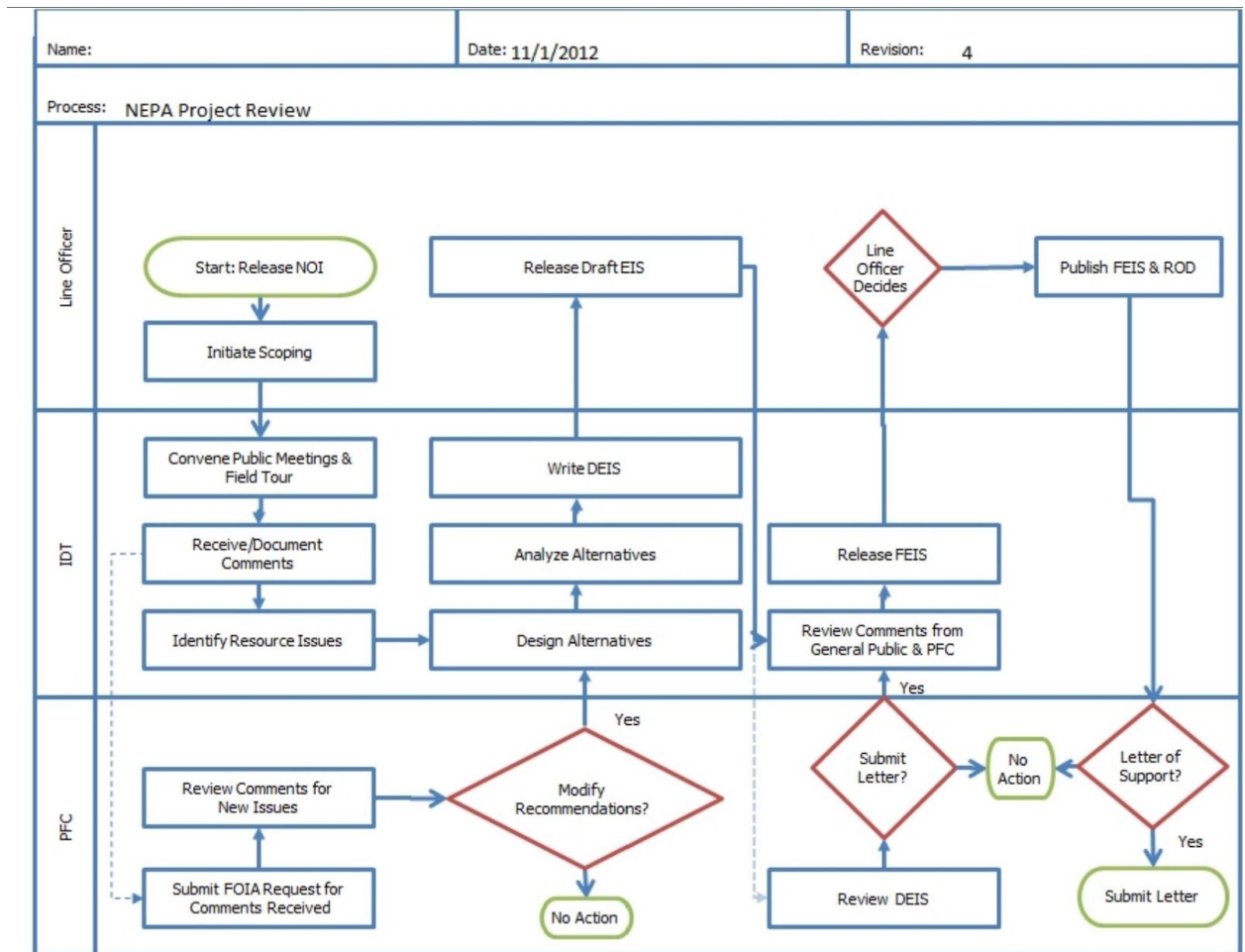


Figure 3: the current NEPA phase business process for an EIS