



National Association of Conservation Districts

August 26, 2019

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

Submitted online at <https://www.regulations.gov/>

Dear Ms. Barker:

The National Association of Conservation Districts (NACD) represents America's 3,000 conservation districts and the 17,000 men and women who serve on their governing boards. Conservation districts are local units of government established under state law to carry out natural resource management programs at the local level. Conservation districts work with millions of cooperating landowners and operators to help them manage and protect land and water resources on private and public lands in the United States.

NACD applauds the U.S. Forest Service (USFS) for proposing the National Environmental Policy Act (NEPA) Rule. The proposed rule expedites environmental review on three types of projects, including 4,200-acre projects to combat insect and disease in combination with stream restoration, infrastructure projects and special uses and permitting, which will directly benefit the health of our national forests. Too often, we see the environmental review process be used to delay or permanently stall projects. NACD appreciates the use of a categorical exclusion, which still requires the agency to go through environmental review. As the nation's local technical natural resource experts, conservation districts can provide a wealth of knowledge for the applicable projects.

The USFS has the statutory authority to use categorical exclusions to combat the spread of insect and disease for 3,000-acre projects. We would like to see more data on the projects that have started and finished under the existing authority. Regarding this proposal, NACD supports the expansion of the size of the projects to 4,200 acres in areas where potential catastrophic conditions exist. NACD recommends that the USFS engage more with conservation districts to improve the health of our national forests.

The infrastructure projects included under this proposal will directly benefit the American taxpayers. As of June 2019, the USFS has a deferred maintenance backlog of \$5.2 billion, and approximately 61 percent of that amount is due to roads. NACD supports expediting the environmental review process on routine projects to save the agency more money as these projects move forward. NACD supports the multiple uses of our national forests and the continued use and development of a road system to ensure public access. This type of access should allow for economic development and provide the necessary firebreaks that are essential to sustain these uses.

The special use permitting aspect of the proposed rule will allow for a better experience for the public in our national forests. The USFS currently manages 192.9 million acres, all of which is accessible to the American public. Special use permits under this proposal include hiking trails



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and water storage projects. By expediting the environmental analysis of these routine projects, it provides the public easier access to better-managed public lands.

Lastly, NACD wants to ensure public comment periods for these projects are still respected. We recommend the USFS to cooperate and coordinate with conservation districts on all applicable projects. Thank you for providing the opportunity for NACD to submit public comments. NACD looks forward to learning about the effective implementation of this proposed rule and working with the U.S. Forest Service to continue addressing the health of our national forests and the integration of locally-led conservation practices.

Sincerely,

A handwritten signature in black ink that reads "Tim Palmer".

Tim Palmer
President
National Association of Conservation Districts