

NAFSR Comments on Proposed Changes in Directive System July 23, 2026

The National Association of Forest Service Retirees (NAFSR) comprises over a thousand long-tenured, retired USDA Forest Service employees with unparalleled experience and expertise in all facets of National Forest management. We appreciate the opportunity to comment on USDA's proposal to amend regulations governing the Directive System for the United States Forest Service; the scope of the notice and comment requirements for the formulation of standards, criteria and guidelines applicable to Forest Service programs; and associated agency procedures.

The subject of this proposal, the agency's directive system, is opaque to most people. As retired agency employees, most of us understand the long-standing need to clarify, clean up and modernize these agency internal processes. The Forest Service Manual and Handbook system has served the agency well over many decades, providing policy and guidance to responsibly and more uniformly implement laws that govern agency actions. We also know that for many years, through multiple administrations, there have been ongoing concerns about how to streamline sometimes redundant or convoluted direction and update old guidance to reflect current best practices.

In the proposal before us, we support the overall concept of a focused effort to improve agency directives with several critical caveats:

- Reductions in agency staffing and ongoing reorganization efforts have reduced agency expertise that is vitally important to a task of this magnitude. Without employees with an in-depth of knowledge in these respective areas of law, regulation and on the ground implementation, there is a greater risk that an effort of this sort will fail.
- Effectiveness should not be measured by the number of pages of direction eliminated. Rather, the measure should be clarity about the purposes and distinctions of what is contained in Manuals and Handbooks. The Manuals must retain policy direction that insures compliance with law and regulations. Handbooks should supply succinct guidance on procedures to implement policy, informed by decades of past experience. With the recent loss of agency employee expertise, the Manuals and Handbooks can be a source of efficient knowledge transfer for new employees.
- A stated goal of this effort is to increase efficiency and afford more local discretion to agency decision makers. We applaud efforts to move agency decision making closer to the ground and local communities. States, Tribes, local governments, permit holders, partners and the public benefit from clarity and consistency as well. This is particularly true with decisions and processes involving such things as special use permits, fees, land management and project level planning, and opportunities for comment, appeals and objections.

- Manual direction should be considered policy, as it speaks to direct interpretation of laws and regulations. Though there has always been a mechanism for appropriate deviations from manual direction, the rationale should be clarified. We suggest a better definition of “in the public interest” or alternately, remove this language and focus on case specific situations with unique circumstances where meeting the intent of law can be achieved in a different manner.
- There is value in the proposed approach to more clearly distinguish between the role of the Manuals and use of the Handbooks. To accomplish this:
 - 1) there must be a thorough review of agency handbooks to move required direction into the appropriate Manual;
 - 2) public comment on substantive changes to manual direction should be valued and required;
 - 3) the review should rely on experience of employees with a deep understanding of subject matter and how it translates to work on the ground.
- Following an in-depth review of handbooks for policy that is non-discretionary which belongs in manuals, handbooks should be revised to provide focused procedural guidance based on best science and informed by experience. Handbook guidance that is outdated, overly prescriptive, overlapping or in conflict with other sections should be removed or rewritten.
- Land Management Plan Revision efforts have had extensive public involvement, consultation with Tribes, and collaboration with States, Counties and interested non-governmental partners and engaged citizens. Plans typically incorporate Manual/Handbooks by reference or include cites in the Plan. With a revision of the Directives system, it will be necessary to crosswalk changes and address whether Plan amendments are required.

The membership of NAFSR remains available to provide our knowledge and experience throughout this process.

Sincerely,
/s/Bill Avey

Bill Avey, Chair
National Association of Forest Service Retirees