



U.S. Department of Agriculture  
Office of Inspector General





# IIJA—Restoration Projects on Federal Land

## Inspection Report 08801-0002-41

OIG determined whether the Forest Service had controls for selecting, funding, tracking, and implementing infrastructure funding to mitigate environmental hazards on Federal land.

### OBJECTIVE

Our objectives were to inspect controls related to project selection, project funding, and accomplishments and to review the implementation of projects funded by IIJA Section 40804(b)(8).

### REVIEWED

We interviewed ECAP personnel from the Washington Office and all nine FS regions, visited five IIJA-funded ECAP project sites in two FS regions, and reviewed the supporting documentation for our selected IIJA projects for FYs 2022 and 2023. We also identified and reviewed applicable laws, policies, and procedures and analyzed program information related to restoration projects, including best practices for internal controls of Federal programs.

### RECOMMENDS

We recommend that FS (1) establish clearly defined, measurable objectives for the ECAP program that align with the expectations in the GAO Green Book and FS policy; (2) establish and document a hiring strategy; and (3) document a knowledge management plan.

### WHAT OIG FOUND

In November 2021, the Infrastructure Investment and Jobs Act (IIJA) provided the Forest Service (FS) with approximately \$5.5 billion for wildfire management, ecosystem restoration, and investment in natural resources-related infrastructure. Of this funding, \$100 million was made available “to restore native vegetation and mitigate environmental hazards on mined land on Federal and non-Federal land” through Section 40804(b)(8). The scope of this inspection specifically covered projects mitigating environmental hazards on Federal land carried out through FS’ Environmental Compliance and Protection (ECAP) program during fiscal years (FYs) 2022 and 2023. During those FYs, FS funded over \$14.2 million of ECAP projects with IIJA funding.

We determined that FS did not have clearly defined, measurable objectives for the ECAP program as outlined by policy. This occurred because ECAP management has not updated the program’s general objectives in roughly 30 years. As a result, the program does not have a target level of performance to compare actual achievement against and ECAP management has not established a sufficient internal control system.

In addition, FS staffed key ECAP program positions with temporarily detailed employees and was negatively impacted by a lack of staffing throughout the program. This occurred because FS did not have a hiring strategy or knowledge management plan in place for the ECAP program. As a result, FS risks IIJA funds for ECAP projects being used inefficiently and ineffectively.

FS generally concurred with our findings and recommendations but stated it could not implement corrective action due to budget restraints and it would reassess if funding became available. OIG accepted management decision on all recommendations. Once funding becomes available FS should propose actions that specifically meet the recommendations.



## OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



**DATE:** March 25, 2025

**INSPECTION**

**NUMBER:** 08801-0002-41

**TO:** Tom Schultz  
Chief  
Forest Service

**ATTN:** Robert Velasco  
Chief Financial Officer/OIG Audit Liaison Staff  
Forest Service

**FROM:** Steve Rickrode  
Acting Assistant Inspector General for Audit

**SUBJECT:** IIJA – Restoration Projects on Federal Land

This report presents the results of our inspection of IIJA – Restoration Projects on Federal Land. Your written response to the official draft is included in its entirety at the end of the report. Based on your written response, we are accepting management decision for all three recommendations in the report, and no further response to this office is necessary.

In accordance with Departmental Regulation 1720-1, final action needs to be taken within 1 year of the date of each management decision. Please follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer.

We appreciate the courtesies and cooperation extended to us by members of your staff during our fieldwork and subsequent discussions. This report contains publicly available information and will be posted in its entirety to our website (<https://usdaoig.oversight.gov>) in the near future.

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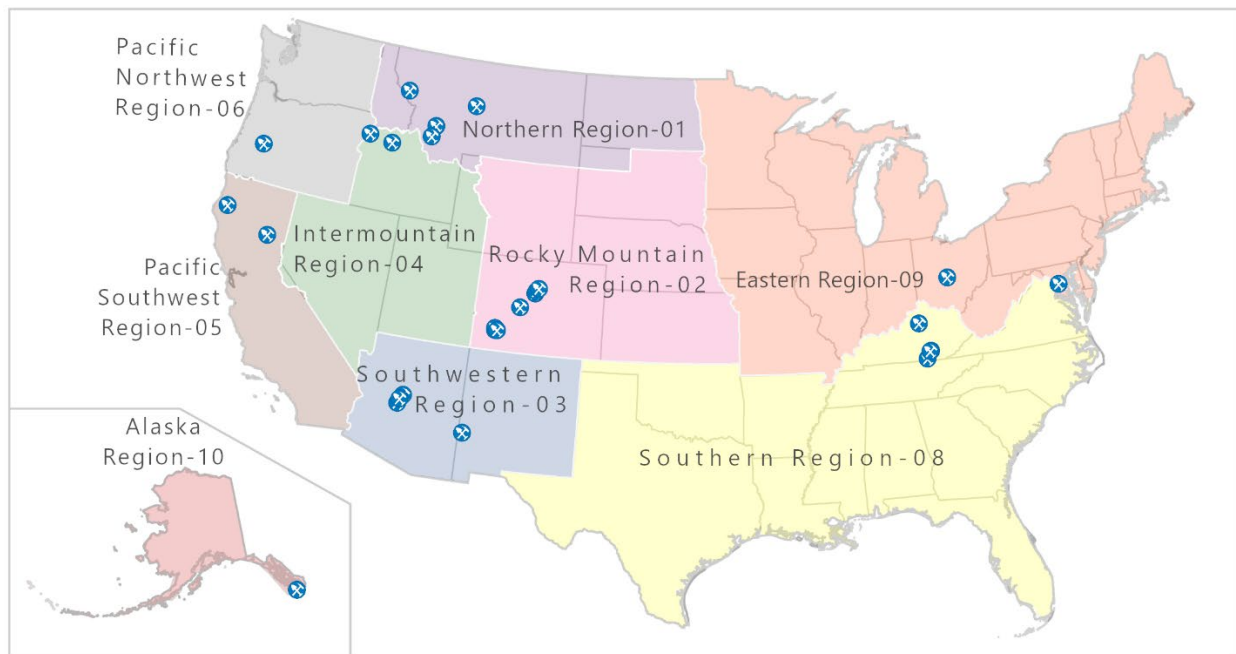
# Background and Objectives

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## Background

The U.S. Department of Agriculture’s (USDA) Forest Service (FS) is responsible for managing approximately 193 million acres of national forests and grasslands throughout the United States. FS’ Environmental Compliance and Protection (ECAP) program addresses environmental hazards at abandoned mines and other contaminated sites located within National Forest System land. ECAP projects aim to mitigate environmental hazards on Federal land where there is a release or threat of release of hazardous substances, pollutants, or contaminants at abandoned mine sites.

The Infrastructure Investment and Jobs Act (IIJA),<sup>1</sup> which was signed into law on November 15, 2021, provided FS with approximately \$5.5 billion for reducing the risk of wildland fire, restoring ecosystems, and investing in natural resources related to infrastructure. Of this funding, \$100 million was made available specifically “to restore native vegetation and mitigate environmental hazards on mined land on Federal and non-Federal land.”<sup>2</sup> However, FS only used a portion of this funding for ECAP program projects mitigating environmental hazards, or restoration projects, on Federal land. In our scope of fiscal years (FYs) 2022 and 2023, FS funded over \$14.2 million of restoration projects with IIJA funding. See Figure 1, a map highlighting the locations of these projects.



**Figure 1. Map of FS’ FYs 2022 and 2023 IIJA-funded restoration projects.**  
Figure by Office of Inspector General (OIG).

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<sup>1</sup> IIJA, Pub. L. No. 117-58, 135 Stat. 429 (2021).

<sup>2</sup> IIJA, Pub. L. No. 117-58, 135 Stat. 1106, § 40804(b)(8) (2021).



FS implemented IJJA-funded projects to mitigate environmental hazards on mined Federal land through its ECAP program. ECAP projects are performed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA).<sup>3</sup> CERCLA was enacted to enable selected Federal agencies to respond to, or “clean-up,” sites that have releases or spills of hazardous substances, pollutants, or environmental contaminants. According to FS, it uses its CERCLA authority to clean up hazardous substances from abandoned mine land and other sites to protect human health and the environment.



FS estimates that 13,597 of 38,991 (more than 34 percent) abandoned mines on National Forest System land contain hazardous substances, pollutants, or contaminants left from prior mining operations, such as copper, lead, and zinc.<sup>4</sup> These minerals can adversely impact human health and the environment.



To ensure long-term program and project stability and to minimize agency liabilities and risks, FS prioritized funding for national priority projects over new projects.<sup>5</sup> FS’ ECAP program managers are responsible for prioritizing and selecting high-risk projects and ensuring that the cleanup of contaminated sites is completed in accordance with CERCLA.

**Figures 2 and 3. The Beal Mountain open-pit mine is the site of multiple projects funded by IJJA. Horizontal drains were installed to reduce groundwater infiltration of the leach pad at the Beal Mountain mine. Project funded by IJJA. Photos by OIG.**

This is the third and final report in our multitiered approach to conducting oversight of FS IJJA funding for restoration projects on Federal land. We previously published reports detailing how FS allocated IJJA funding for Section 40804(b)(8) and how FS planned to select projects to

<sup>3</sup> CERCLA, Pub. L. No. 96-510, 94 Stat. 2767 (codified at 42 U.S.C. 103).

<sup>4</sup> This FS estimate of abandoned mines is found on FS’ Abandoned Mine Lands webpage and is based on data compiled by the United States Bureau of Mines, Department of the Interior, in 1995. USDA-FS, *Abandoned Mine Lands* (Nov. 5, 2024), <https://www.fs.usda.gov/managing-land/natural-resources/geology/abandoned-mine-lands>.

<sup>5</sup> FS’ national priority projects include sites that are subject to penalties, regulatory action, or enforceable agreements and any projects at active and previously vetted ECAP sites.

restore native vegetation and mitigate environmental hazards on Federal and non-Federal land.<sup>6</sup> This inspection report focuses on internal controls over IJJA-funded ECAP project selection, funding, implementation, and accomplishments.

## Objectives

To complete our multitiered approach, we conducted an inspection of FS projects mitigating environmental hazards on Federal land funded by IJJA Section 40804(b)(8). Our objectives were to inspect controls related to project selection, project funding, and accomplishments and to review the implementation of projects.

Specifically, we answered the following objective questions:

1. If there are sufficient data available for data analytics related to projects mitigating environmental hazards on Federal land, do they have integrity and quality?
2. Does FS have controls to ensure projects are appropriately selected, and project funding and accomplishments are properly tracked and reported?
3. Did FS ensure selected projects were implemented and completion of projects was tracked according to the applicable requirements?

We found no issues related to the first objective question about integrity and quality of data or the third objective question about FS selected projects being implemented and completion of projects being tracked according to the applicable requirements.

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<sup>6</sup> Information Report 08801-0002-41(IN1), *IJJA-Restoration Projects on Federal/Non Federal Land*, July 2023, and Information Report 08801-0003-41, *IJJA-Restoration Projects on Federal/Non-Federal Land: Project Selection*, Mar. 2024.

## Finding 1: FS Lacks Clearly Defined, Measurable Objectives for the ECAP Program

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FS lacks the clearly defined, measurable objectives outlined by policy for the ECAP program. This occurred because ECAP management has not updated the program's general objectives in roughly 30 years. As a result, the program does not have a target level of performance to compare actual achievement against and ECAP management has not established a sufficient internal control system.

The Office of Management and Budget (OMB) Circular A-123<sup>7</sup> requires Federal Departments and agencies to establish internal controls in accordance with the Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government*, known as the Green Book.<sup>8</sup> The GAO Green Book contains the requirements necessary to establish an effective internal control system. As part of designing this system, "management should define objectives clearly to enable the identification of risks and define risk tolerances."<sup>9</sup> Additionally, the GAO Green Book suggests that management define these objectives in specific and measurable terms.<sup>10</sup>

FS policy states that performance accountability is achieved by establishing meaningful and appropriate performance goals at each level of the organization.<sup>11</sup> It defines a performance goal as "a target level of performance expressed as a measurable objective, against which actual achievement can be compared." It further states that "a goal is expressed in a manner that allows a future assessment to be made of whether the goal was or is being achieved."<sup>12</sup>

We found that the ECAP program does not have established objectives that meet the GAO Green Book and FS policy expectations noted above. While FS does have published objectives for the Hazardous Materials Management Program (renamed ECAP in November 2001), the objectives are general in nature and have not been updated since 1994. The objectives are to protect the safety and health of the public and FS employees from hazardous materials; to minimize future agency and personal liabilities related to hazardous materials; and to protect and/or restore, from the impact of hazardous materials, the natural resources and the environment on (1) National Forest System lands, (2) lands outside the National Forest System that are affected by actions authorized on National Forest System lands, and (3) lands leased by FS.<sup>13</sup> An FS official told us the objectives had not been updated because revisions are a considerable undertaking and other directives were prioritized for revision due to regulation changes and a greater need for update. The official also stated that the intent behind the objectives had not changed. However, these objectives fall short of the expectations outlined in policy because they do not define risk

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<sup>7</sup> OMB, *Management's Responsibility for Enterprise Risk Management and Internal Control*, Circular A-123 (July 15, 2016).

<sup>8</sup> GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Sept. 2014).

<sup>9</sup> GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G, ¶ 6.01 (Sept. 2014).

<sup>10</sup> GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G, ¶ 6.02 (Sept. 2014).

<sup>11</sup> USDA FS, *Forest Service Manual*, § 1491 (June 8, 2007).

<sup>12</sup> USDA FS, *Forest Service Manual*, § 1490.5 (June 8, 2007).

<sup>13</sup> USDA FS, *Forest Service Manual*, § 2160.2 (Nov. 10, 1994).



tolerances and are not measurable. They also are not expressed in a manner that allows a future assessment to be made of whether the goal was or is being achieved.

Because the ECAP program did not have clearly defined, measurable objectives, there was less context and framework available regarding the decisions made for the prioritization and selection of IIJA-funded ECAP projects and there were internal concerns about and inconsistencies with this process. For example:

- FS employees with ECAP program responsibilities expressed concern that there was a lack of transparency related to the project selection process. One regional environmental engineer raised concerns about the selection and implementation of projects in FYs 2022 and 2023, citing a lack of clarity at the regional level. Additionally, this FS employee stated that FS had not used the most beneficial method for addressing some of its critical needs. If these projects had been selected in alignment with clearly defined, measurable ECAP program objectives, FS employees may have had a better understanding of the Washington Office's prioritization and selection decisions.
- FY 2022 IIJA-funded ECAP projects were selected by the national environmental engineer. However, this position was vacated in January 2023 and has been filled by temporarily detailed employees, each serving 120-day details. As a result, projects in FY 2023 and FY 2024 were selected by different acting national environmental engineers, each using different methods for project selection. Clearly defined, measurable objectives for the ECAP program would have given these engineers consistent context and framework for making selection decisions and addressing areas of risk. Other staffing-related concerns are discussed in Finding 2.



**Figure 4. Drainage pipe installed on the Daniel Boone National Forest to reroute acidic mine drainage. The installation was funded through IIJA. Photo by FS.**

Further, because there were not clearly defined, measurable objectives for the ECAP program, FS has not established a target level of performance against which actual achievement can be compared. ECAP accomplishments are tracked in USDA's National Environmental Accomplishment Tracking system.<sup>14</sup> However, these accomplishments generally show which

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<sup>14</sup> The National Environmental Accomplishment Tracking system is USDA's sole centralized source of information for USDA's inventory of potentially contaminated sites and progress in cleaning up and restoring USDA's natural resources and facilities.

step in the CERCLA process has been accomplished.<sup>15</sup> Often, FS completes several smaller, projects at active sites over a period of several years before a step in the CERCLA process, such as a cleanup action, is completed. FS does not track the accomplishments of these smaller, projects and is missing an opportunity to measure actual achievement.

Additionally, the GAO Green Book sets internal control standards for Federal entities. The standards in the Green Book are organized into the five components of internal control. The five components apply to staff at all organizational levels and to all categories of objectives. Each of the five components of internal control contains several principles. Principles are the requirements of each component. Because ECAP management has not defined objectives clearly to enable the identification of risks and define risk tolerances, one of the GAO Green Book's principles, it has not established a sufficient internal control system.

We discussed with FS officials the need for establishing clearly defined, measurable ECAP program objectives. An FS official noted that ECAP projects were often unique and too varied to combine into measurable objectives. While we recognize that ECAP projects take many diverse forms, it is important to define ECAP program objectives in specific and measurable terms to ensure FS can assess performance toward achieving those objectives and ensure ECAP has a sufficient internal control system.

Without updated clearly defined, measurable objectives for the ECAP program, the program does not have a target level of performance against which actual achievement can be compared and ECAP management has not established a sufficient internal control system. We recommend that FS establish clearly defined, measurable objectives for the ECAP program that align with the expectations in the GAO Green Book and FS policy.

## **Recommendation 1**

Establish clearly defined, measurable objectives for the ECAP program that align with the expectations in the GAO Green Book and FS policy.

### **Agency Response**

FS generally concurs with the recommendation. However, budget constraints impact the agency's ability to implement corrective action at this time. FS plans to reassess if funding becomes available.

### **OIG Position**

We accept management decision on this recommendation due to FS' budgetary funding constraints. Once funding becomes available FS should propose an action that specifically meets this recommendation.

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<sup>15</sup> CERCLA accomplishments reported annually to USDA's Office of Budget and Program Analysis from the National Environmental Accomplishment Tracking system include site assessments, cleanup studies, cleanup actions, long-term monitoring, and long-term operations and maintenance.

## **Finding 2: FS' Staffing Challenges Are a Limiting Factor for Administering IJA ECAP Funding**

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FS staffed key ECAP program positions with temporarily detailed employees. FS was also negatively impacted by a lack of staffing throughout the program. Further, as ECAP staff left positions, their program knowledge was not always documented or provided to their successors. This occurred because FS did not have key internal controls, such as a hiring strategy or knowledge management plan, for the ECAP program. As a result, FS risks using IJA funds for ECAP projects inefficiently, ineffectively, or both because of the temporary nature of detailed employees' tenures (120 days), the limited number of program staff, and a lack of documented quality information communicated and provided to successors.

The GAO Green Book states that management should (1) establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives; (2) demonstrate a commitment to recruit, develop, and retain competent individuals; and (3) internally communicate the necessary quality information to achieve the entity's objectives.<sup>16</sup>

We found that FS did not fully establish these key internal controls within the ECAP program. For example, FS' national environmental engineer made the decisions related to the selection of IJA-funded ECAP projects; however, this position was last staffed by a permanent employee in January 2023. Since then, it has been staffed by employees detailed to the position for 120-day periods. As of July 2024, FS did not have an estimated timeframe or plan for when a permanent national environmental engineer would be hired.

The regional and forest levels of the ECAP program were also inhibited by staffing challenges. Multiple regions indicated that staffing levels limited the ECAP work that could be carried out. For example, an employee from one region stated that the region has areas with no on-scene coordinators<sup>17</sup> available to monitor projects, which prevents it from doing ECAP work in those areas.

These staffing challenges throughout the program expose FS to the risk of using IJA funds for ECAP projects inefficiently, ineffectively, or both. During our fieldwork, we interviewed the acting national environmental engineer, who was unable to answer our questions about the selection of FY 2022 and FY 2023 IJA-funded ECAP projects, citing a lack of information or documentation on decision-making processes from prior national environmental engineers. Additionally, one regional environmental engineer explained that there was about a year of interim acting employees after the prior regional environmental engineer left the agency, noting that no documentation was provided regarding how ECAP projects for the region had been planned and prioritized, which could have helped ensure consistency in the region's decision-making.

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<sup>16</sup> GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G, ¶ 3.01, 4.01, & 14.01 (Sept. 2014).

<sup>17</sup> An on-scene coordinator is the government official designated to coordinate and direct the cleanup or removal of released hazardous substances from the environment (called a removal action). FS is required to provide on-scene coordinators for all its CERCLA-related removal actions.

Notably, we did identify a best practice for internally communicating this necessary quality information during our fieldwork. One regional environmental engineer maintains a 5-year program of ECAP work for the region that can be used to understand how the region was planning and strategizing future ECAP projects. It is possible that other regions and the Washington Office could benefit from similar documentation.

Without a knowledge management plan, FS cannot ensure that the necessary quality information is internally communicated. Specifically, FS cannot ensure consistency between acting national environmental engineers. Additionally, acting national environmental engineers are not able to implement long-term strategies that may be beneficial to FS programs. At the regional level, staffing challenges limit FS' ability to fulfill its mission. FS cannot remediate environmental concerns in areas lacking sufficient staff, despite the presence of abandoned mines requiring action, even if provided additional funding.

We discussed these challenges with FS officials, and they generally agreed with our finding. The acting director of engineering explained that hiring a new national environmental engineer is the engineering department's top staffing priority; however, the engineering department must compete with the rest of the National Forest System's hiring needs for the ability to hire. The acting national environmental engineer also acknowledged that increased documentation of its processes and decision-making would help consistency within the program.



**Figure 5. Area of Flat Creek mine tailings to be revegetated. Project funded by IIJA. Photo by OIG.**

Based on the staffing and documentation concerns that we found during our inspection, FS has not met the requirements to (1) establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives; (2) demonstrate a commitment to recruit, develop, and retain competent individuals; and (3) internally communicate the necessary quality information to achieve the entity's objectives. To meet these requirements, we recommend that FS establish and document a hiring strategy to ensure FS has sufficient qualified staff at all levels of the ECAP program and document a knowledge management plan to ensure all relevant information from ECAP program activities is communicated and provided to successors.

## **Recommendation 2**

Establish and document a hiring strategy to ensure FS has sufficient qualified staff at all levels of the ECAP Program.



### **Agency Response**

FS generally concurs with the recommendation. However, budget constraints impact the agency's ability to implement corrective action at this time. FS plans to reassess if funding becomes available.

### **OIG Position**

We accept management decision on this recommendation due to the budgetary funding constraints. Once funding becomes available FS should propose an action that specifically meets this recommendation.

## **Recommendation 3**

Document a knowledge management plan to ensure all relevant information from ECAP program activities is communicated and provided to successors.

### **Agency Response**

FS generally concurs with the recommendation. However, budget constraints impact the agency's ability to implement corrective action at this time. FS plans to reassess if funding becomes available.

### **OIG Position**

We accept management decision on this recommendation due to the budgetary funding constraints. Once funding becomes available FS should propose an action that specifically meets this recommendation.

## Scope and Methodology

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The scope of our inspection was FS controls related to project selection, implementation, funding, and reporting of IJIA-funded projects mitigating environmental hazards on Federal land for FYs 2022 and 2023. The 30 projects within our initial scope totaled more than \$14.2 million. We non-statistically selected five sites for visits from two regions that received over 10 percent of the funding and were accessible based on weather and staffing availability.<sup>18</sup> These five sites received over \$3.6 million in funding. We conducted our fieldwork between December 2023 and November 2024. We discussed the results of our inspection with agency officials on December 10, 2024, and included their comments as appropriate.

To accomplish our inspection objectives, we:

- Identified and reviewed applicable laws, policies, and procedures and analyzed program information related to restoration projects, including best practices for internal controls of Federal programs.
- Requested and reviewed documentation relating to the FY 2022 and FY 2023 IJIA-funded ECAP project selection and execution activities.
- To assess the reliability of FS ECAP data, we confirmed with FS that the total number of ECAP projects in FYs 2022 and 2023 matched the data provided by the agency. We make no representation regarding the adequacy of any agency computer system, or the information generated from it, because evaluating the effectiveness of information systems or information technology controls was not one of our inspection's objectives.
- Interviewed FS program and budget officials at the Washington Office, as well as the administrator for USDA's National Environmental Accomplishment Tracking system.<sup>19</sup>
- Interviewed all nine FS regional environmental engineers and seven budget officials within the FS regions.
- Completed site visits at five IJIA-funded ECAP project sites: three sites in Kentucky (Region 8) and two sites in Montana (Region 1). See Exhibit A.
- Reviewed the supporting documentation for our judgmentally selected projects from the FY 2022 and FY 2023 universe.

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<sup>18</sup> One of these projects was not included in our initial universe. It received FY 2022 IJIA funds that were reallocated from a different project.

<sup>19</sup> The National Environmental Accomplishment Tracking system is USDA's sole centralized source of information for USDA's inventory of potentially contaminated sites and progress in cleaning up and restoring USDA's natural resources and facilities.

We reviewed GAO’s *Standards for Internal Control in the Federal Government* to determine how we would inspect key aspects of FS’ control environment. Overall, we identified four components and five principles that were significant to our inspection objectives. In particular, we assessed the following components and principles as part of answering our overall inspection objectives:

Component	Principle
Control Environment	Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity’s objectives.
Control Environment	Management should demonstrate a commitment to recruit, develop, and retain competent individuals.
Risk Assessment	Management should define objectives clearly to enable the identification of risks and define risk tolerances.
Control Activities	Management should design control activities to achieve objectives and respond to risks.
Information and Communication	Management should internally communicate the necessary quality information to achieve the entity’s objectives.

For the purpose of evaluating the control environment, we determined whether FS established an organizational structure, assigned responsibilities, and delegated authority to achieve the objectives for the program as outlined in IIJA. We accompanied this by reviewing the requirements outlined in IIJA and reviewing FS documentation. Because our review was limited to these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this inspection.

We conducted this inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency’s *Quality Standards for Inspection and Evaluation*.<sup>20</sup> These standards require that we obtain sufficient and appropriate evidence to meet our inspection objectives, support our findings, and provide a reasonable basis for our conclusions. We believe that the evidence obtained provides a reasonable basis for our conclusions.

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<sup>20</sup> GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Sept. 2014).

## Abbreviations

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CERCLA.....	Comprehensive Environmental Response, Compensation, and Liability Act
ECAP .....	Environmental Compliance and Protection
FS .....	Forest Service
FY .....	fiscal year
GAO.....	Government Accountability Office
GPRA.....	Government Performance and Results Act
IIJA .....	Infrastructure Investment and Jobs Act
NF .....	National Forest
OIG .....	Office of Inspector General
OMB .....	Office of Management and Budget
U.S.C.....	United States Code
USDA.....	U.S. Department of Agriculture



## Exhibit A: Sites Visited

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This exhibit shows the name and location of all FS sites visited as part of this inspection.

Inspection Site	Location
National Office (virtual)	
FS Washington Office	Washington, DC
Regional Offices (virtual)	
FS Region 1	Missoula, MT
FS Region 2	Lakewood, CO
FS Region 3	Albuquerque, NM
FS Region 4	Ogden, UT
FS Region 5	Vallejo, CA
FS Region 6	Portland, OR
FS Region 8	Atlanta, GA
FS Region 9	Milwaukee, WI
FS Region 10	Juneau, AK
Ranger Districts (physical)	
Stearns Ranger District Office	Whitley City, KY
Superior Ranger District Office	Superior, MT
Project Sites (physical)	
Beal Mountain Mine (Region 1)	Beaverhead-Deerlodge National Forest (NF)
Flat Creek Mines (Region 1)	Lolo NF
Wildcat Branch Area A (Region 8)	Daniel Boone NF
Wildcat Branch Area B (Region 8)	Daniel Boone NF
Rock Creek Mines (Region 8)	Daniel Boone NF

**Forest Service's  
Response to Inspection Report**



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**File Code:** 1430

**Date:** March 3, 2025

**Subject:** Response to OIG Report - Restoration Projects on Federal Land 08801-0002-41

**To:** Steven Rickrode, Acting Assistant Inspector General for Audit

Thank you for the opportunity to review and comment on the Office of Inspector General (OIG) Report Number 08801-0002-41.

The Forest Service generally concurs with the findings and recommendations and appreciates the time and effort that went into the report. The agency's response to the recommendations is enclosed.

Please contact Jennifer McGuire, Acting Chief Financial Officer, at (505) 563-7162 or [jennifer.mcguire@usda.gov](mailto:jennifer.mcguire@usda.gov), with any questions.

RANDY MOORE  
Chief

Enclosure (1)



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USDA Forest Service (FS)

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Office of Inspector General (OIG) Inspection Report No. 08801-0002-41  
IIJA Restoration Projects on Federal Land

**Response to the Official Draft Report**

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**Recommendation 1:** Establish clearly defined, measurable objectives for the Environmental Compliance and Protection (ECAP) program that align with the expectations in the GAO Green Book and FS policy.

**FS Response:** The Forest Service generally concurs with the recommendation. However, budget constraints impact the agency's ability to implement corrective action at this time. Forest Service plans to reassess if funding becomes available.

**Estimated Completion Date:** March 4, 2026

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**Recommendation 2:** Establish and document a hiring strategy to ensure FS has sufficient qualified staff at all levels of the ECAP Program.

**FS Response:** The Forest Service generally concurs with the recommendation. However, budget constraints impact the agency's ability to implement corrective action at this time. Forest Service plans to reassess if funding becomes available.

**Estimated Completion Date:** March 4, 2026

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**Recommendation 3:** Document a knowledge management plan to ensure all relevant information from ECAP program activities is communicated and provided to successors.

**FS Response:** The Forest Service generally concurs with the recommendation. However, budget constraints impact the agency's ability to implement corrective action at this time. Forest Service plans to reassess if funding becomes available.

**Estimated Completion Date:** March 4, 2026

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