AGENCY INFORMATION

Agency: USDA

Name of Agency CERPO: Scott Vandegrift

Email address of Agency CERPO: Scott.Vandegrift@usda.gov

Agency submitter (if different from agency CERPO):

Submitter email address:

*If this form is submitted by a Permitting Council member's designee, please provide a delegation memo with the self-assessment submission.

SECTION 1. EXAMPLES OF BP IMPLEMENTATION

While FPISC OED does not require an implementation narrative for each BP category, it encourages each member agency to highlight its successes and challenges for each category. This can be in the form of identifying positive outcomes from implementation of a BP during FY 2020 or from identifying where a BP did not prevent the issue it was intended to prevent and how the agency or Permitting Council may want to consider addressing that. The specific BPs to be reported on are listed in Table 1 of the Fiscal Year 2020 Recommended Best Practices for Environmental Reviews and Authorizations for Infrastructure Projects and in Appendix B. Please note, BP Categories and BPs have been shortened in the dropdowns for ease of use.

Agencies are also encouraged to identify and submit "alternative BPs" that reflect where the agencies have implemented process improvements that meet the statutory BP categories but not one of the specific BPs identified in the FY 2020 BP Report. Alternative BPs should be submitted to FPISC OED by August 28, 2020 for approval before submitting the BP through this form. If your alternative BP has been approved, please choose "Alternative BP" from the "Corresponding BP" drop-down menu below for the appropriate entry.

Please adhere to a word count limit of 200 words per BP example in this section (i.e., if you provide examples of implementation of four BPs, please use four template boxes below for a total word count of 800 words), while thoroughly reflecting your accomplishments and challenges. Provide links and/or citations as appropriate, and provide as many relevant examples as possible. If you would like to provide more than four examples of BP implementation, please contact FPISC OED for a supplemental form.

Best Practice Category: (i) Early stakeholder engagem	Corresponding BP: i.1 Early stakeholder engagem
Identifying pre-work, such as wildlife, botany, and water quality resource surveys in advance of formal application filing with FERC can streamline the NEPA process and avoid supplemental NEPA. For Pacific Connector Pipeline in Oregon, the Forest Service worked with the applicant in the FERC pre-filing process to avoid delays or information gaps that could of led to vulnerability during decision making. The Forest Service relied less on after-the-fact fixes by way of modeling impacts and, instead, had field data that wasn't open to speculation and scientific debate.	

Best Practice Category: (v) Reducing information coll	Corresponding BP: v.2 Joint processes or progra
Integrating land management planning regulation requirements into the FPISC process and project milestones is an ongoing priority for USDA. Most major infrastructure projects that are on federal lands require land management plan adjustments. Including the environmental review, scoping, alternatives and objections processes for laws such as National Forest Management Act in the NEPA analysis will add some time to the NEPA review due to some conflicting regulatory requirements and additional information needs at the	

Best Practice Category: (iv) Increasing transparency	Corresponding BP: iv.1 Share information about
Coordinate analysis with FERC where agencies have common requirements of effects disclosures to reduce analysis redundancy in NEPA documents and leads to opportunities for inconsistent analysis or conclusions. Cooperating agencies can focus additional resources/analysis on their respective narrower legal and regulatory requirements which goes beyond general effects disclosures. Example: On the Pacific Connector Project, hydrology reports that contain general watershed analysis were synced, then where Forest Service had more restrictive thresholds due to land use plan sustainability requirements, the Forest Service can provided particular impacts effects analysis to the narrower	

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SECTION 2. FAST-41 PROJECT SPECIFIC PERMITTING IMPROVEMENTS/OUTCOMES

This section should highlight examples from specific projects. Please include agency innovations, initiatives, successes, and identification of and resolution to challenges. Agencies are encouraged to report on FPISC OED recommendations from the FY 2019 ARC (See OED Assessment, Part 2).

Please adhere to a total word count limit of 300 words for this section, while thoroughly reflecting your accomplishments and challenges. Provide links and/or citations as appropriate. Provide as many relevant examples as possible in the space provided below.

USDA executed a strategy for Pacific Connector Pipeline to align agency process and decision points with other Federal and State agencies that is resulting in litigation avoidance for the US Forest Service. A relatively simple concept, but often proving very difficult to implement with the numerous regulatory conflicts and executing offices. Past projects like Atlantic Coast Pipeline, have not aligned their decisions and put Forest Service in the lead for legal challenges and in some cases telegraphing alternatives that may undermine other agency analyses. Implementing these measures for Pacific Connector Pipeline is arguably saving USDA millions in staff time defending unnecessary lawsuits and better aligning all Federal decisions to better defensible decisions.

SECTION 3. PERMITTING PROCESS IMPROVEMENTS (GENERAL)

Please document activities undertaken by the agency in FY 2020 that may be outside the information captured in the two sections above. Examples include challenges addressed or looking to be addressed through actions like: new tracking systems, procedural changes, outreach efforts/information gathering, regulatory changes, and interagency discussions/working groups/agreements/collaboration through the Permitting Council and with other Permitting Council member agencies. This section provides a space to report any new and unexpected challenges with novel solutions developed by agencies. Addressing challenges that were anticipated, then addressed by existing or new BPs can be included in sections 1 and 2.

Please provide a narrative for each process improvement in a separate section below. Please adhere to a total word count limit of 300 words for this section, while thoroughly reflecting your accomplishments and challenges. Provide links and/or citations as appropriate. Provide as many relevant examples as possible in the space provided below.

In 2020 USDA developed and implemented a checklist and project framework template for FAST41 and OFD projects responsive to meeting the requirements and intent of FAST41 and all policies designed to expedite project execution. The design of the framework is intended to simplify the various requirements and create a visualization of a successful project execution for field personnel and local decision makers. USDA followed up the development of this template by holding internal project meetings for each FAST41 and OFD project to include all the levels of leadership associated with each project. These meetings not only served as a platform to train personnel on FAST41 process and principles but enabled every level of program management and leadership to get on the same page and further facilitate future communications and project delivery.

Early identification of potential problems or delays are critical to timely resolution or avoidance all together. USDA implemented a policy in 2020 to align the lines of communications with all USDA

This information has been reviewed by the Permitting Council Member and CERPO, and others as necessary (public affairs, legislative affairs, office of general counsel staff). I understand that this information will be used as submitted in the FPISC Annual Report to Congress and is testimony-ready for use by Administration officials. ☑

Scott Vandegrift

CERPO Name (or designee)	Signature

SUBMIT

Permitting Council Member Agency Self-Assessment

Agency Input to FPISC's FY 2020 Annual Report to Congress

Section 1 Supplement

Please use this section to supplement Section 1. Examples of BP Implementation. Please submit this document with your Agency Self-Assessment form to FPISC OED by October 14, 2020

Best Practice Category: (v) Reducing information coll	Corresponding BP: v.2 Joint processes or progra
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Best Practice Category: (ii) Timely decisions for ERA (	Corresponding BP: Unique to Agency
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Best Practice Category: (iii) Improving coordination	Corresponding BP: Unique to Agency
Early identification of potential problems or delays are critical to timely resolution or avoidance all together. USDA implemented a policy in 2020 to align the lines of communications with all USDA FAST41 and OFD projects directly between the CERPO and project managers in USDA. Furthermore, USDA positioned the CERPO role to report directly to the Deputy Secretary. This alignment ensures accountability and responsiveness of senior leadership while providing a conduit for information flow that is clear, unhindered and expedited. In 2020 there were numerous occasions where the Executive Director or FPISC staff requested details of a project milestone or evolving situation that was facilitated	

Best Practice Category: (ii) Timely decisions for ERA (	Corresponding BP: ii.1 ERA process templates/ c
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SUBMIT