



U.S. Department of Agriculture  
Office of Inspector General  
Western Region  
Audit Report

FOREST SERVICE  
SIUSLAW NATIONAL FOREST  
LAND ADJUSTMENT PROGRAM  
CORVALLIS, OREGON



Report No.  
08003-7-SF  
SEPTEMBER 2001



UNITED STATES DEPARTMENT OF AGRICULTURE

OFFICE OF INSPECTOR GENERAL

Washington D.C. 20250



DATE: September 10, 2001

REPLY TO

ATTN OF: 08003-07-SF

SUBJECT: Land Adjustment Program, Siuslaw National Forest, Corvallis, Oregon

TO: Dale Bosworth  
Chief  
USDA Forest Service

This report presents the results of our audit of the land adjustment program on the Siuslaw National Forest (SNF). Our audit objectives were to determine whether SNF land adjustment transactions met the intent of the program and other authorizing legislation, and served the general public's best interest.

The FS' written response to the draft report is included in its entirety as Exhibit B. We appreciate the prompt corrective actions initiated by FS regional staff to address the conditions noted in the report. Based on the FS' response, we have accepted management decision on all audit recommendations except for Recommendation No. 5.

In order to reach management decision on this recommendation, please provide the information shown in the OIG position section of the report within 60 days. Departmental Regulations 1720-1 requires a management decision to be reached on all findings and recommendations within a maximum of 6 months from date of report issuance.

The Office of the Chief Financial Officer (OCFO), U.S. Department of Agriculture, has responsibility for monitoring and tracking final action for the findings and recommendations. Please follow your agency's internal procedures for forwarding final action correspondence to OCFO.

/s/

RICHARD D. LONG  
Assistant Inspector General  
For Audit

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# EXECUTIVE SUMMARY

## FOREST SERVICE SIUSLAW NATIONAL FOREST LAND ADJUSTMENT PROGRAM CORVALLIS, OREGON

REPORT NO. 08003-7-SF

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### RESULTS IN BRIEF

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This report presents the results of the U.S. Department of Agriculture, Office of Inspector General's (OIG) audit of the land adjustment program at the Forest Service (FS), Siuslaw National Forest (SNF), Corvallis, Oregon. The SNF administers over 630,000 acres of lands located in the Coast Range of western Oregon.

Under the land adjustment program, the SNF acquires new land, either through purchases or exchanges, in order to further FS objectives—protecting natural resources, increasing recreation, etc. Each year, private parties propose sales or exchanges to the FS. The agency analyzes each in terms of the FS objectives expressed in the Northwest (NW) Forest Plan<sup>1</sup> and other guidance. We reviewed 10 recent land acquisitions completed or in progress on the SNF. These transactions involved about 1,149 acres of land and were valued at \$4.2 million.

Our audit concluded that SNF and Regional Office (RO) lands staff did not effectively analyze the feasibility of a proposed \$1.6 million land exchange. This occurred because lands staff did not adequately perform their responsibilities for analyzing and reviewing the exchange proposal, and because they were not familiar with the land management objectives of the NW Forest Plan. The proposed transaction, which involved a private timber company, would have disposed of FS land that harbored old-growth trees and provided critical habitat for the northern spotted owl (NSO). RO lands staff decided to reject the land exchange proposal after discussions with the FS National Landownership Adjustment Team (NLAT) raised questions about the proposal's feasibility.

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<sup>1</sup> The record of decision, commonly referred to as the NW Forest Plan, is officially entitled "Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl."

We also found that FS acquisition and restoration of lands in the Salmon River Estuary have been stalled. This occurred because some FS staff are waiting for further guidance from the RO clarifying the resolution of acquisition and restoration work that can be done. As a result, efforts to restore the estuary and associated wetlands, an objective of the Cascade Head Scenic Research Area (CHSRA) Act, were not being wholly accomplished.

Finally, we determined that forest staff did not secure and remove unneeded structures acquired through land purchase in a timely manner. This occurred because staff did not consider the structures to be unsafe, and did not have direction requiring their expeditious removal. However, four of the five structures we visited, which had remained untended for an average of 2 years, had deteriorated and posed a potential safety hazard to the public.

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## **KEY RECOMMENDATIONS**

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We recommend that the FS (1) clearly identify the delegated responsibilities of lands staff executing and reviewing the feasibility analyses prepared for proposed land exchanges, and communicate these responsibilities in supplemental, written direction; (2); direct RO lands staff responsible for reviewing land exchange proposals to only recommend approval of projects that meet land management objectives, serve the public interest, and appear feasible; and (3) provide training on the land exchange requirements of the NW Forest Plan to RO and forest lands staff.

Concerning the Salmon River Estuary, we recommend that the FS request an opinion from the Office of the General Counsel (OGC) to resolve funding authority associated with parcels purchased by the Federal Government that include the state-owned lands.

Finally, in cases where the FS acquires unneeded structures slated for disposal, we recommend that forest staff secure the structures immediately after acquisition and take necessary steps to protect public safety. Direction should also be provided concerning the timely maintenance and disposal of unneeded structures acquired in land purchases.

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## **FS RESPONSE**

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The FS generally concurred with all audit recommendations, with the exception of Recommendations No. 1, 5, and 7. On 2 audit recommendations with which the FS did

not concur, the FS had completed other actions that met the intent of  
OIG's recommendations. The complete FS written response to the audit  
is shown as Exhibit B.

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**OIG POSITION**

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Based on FS written response, OIG accepted FS management decision for 6 of the 7 audit report recommendations. However, the FS needs to complete additional actions on Recommendation no. 5 before OIG can accept FS' management decision.

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# INTRODUCTION

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## BACKGROUND

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The SNF is located within the Pacific Northwest (PNW) Region of the FS. The SNF administers over 630,000 acres of lands located in the Coast Range of western Oregon. The mild and wet climate encourages dense stands of tall trees, miles of streams, and a diversity of fish and wildlife habitat including migrating fish, bald eagle, marbled murrelet and NSO.

The land adjustment program sets forth the requirements for purchasing and exchanging forestlands to protect critical natural resource areas, increase public recreation, eliminate conflicting uses, and improve management efficiency. From FY 1996 through FY 2000, the SNF had 15 land adjustment transactions completed or in progress. Eight of the transactions were completed purchases in which the forest acquired 958 acres of private land for approximately \$2 million. Six of the transactions were completed land exchanges in which the forest acquired approximately 347 acres of private land, valued at about \$4.7 million, in exchange for approximately 610 acres of Federal land. At the time of our audit, the SNF was working on a proposed \$1.6 million<sup>2</sup> land exchange with Lincoln City, that involved the disposal of approximately 714 acres of Federal land in exchange for 60 acres of private land. This exchange proposal has subsequently been terminated.

Several key factors determine whether land should be acquired or exchanged. First, land adjustments must meet the goals, objectives, and management guidelines of the *Siuslaw National Forest Land and Resource Management Plan*, as well as the NW Forest Plan. Second, land adjustments must serve the public interest. Finally, all lands exchanged or purchased must be valued in accordance with Federal appraisal standards.

### Northwest (NW) Forest Plan

In April 1993, controversy over the survival of the NSO and the harvesting of old-growth Federal forests of the PNW prompted President Clinton to call for an interagency effort by expert scientists, economists, sociologists

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<sup>2</sup> This value was based on estimates provided by the land exchange proponent and does not represent an official FS determination.



and others to develop a balanced, comprehensive, and long-term policy for the management of over 24 million acres of public land within the range of the NSO. The result was the NW Forest Plan that provided standards and guidelines for management of late-successional reserves<sup>3</sup> (LSR) and old-growth species habitat. The NW Forest Plan superseded existing land management planning documents previously created by the RO and 13 of its national forests, including the SNF, unless the prior FS direction was more restrictive or provided greater benefits to LSR species.

In an effort to create a suitable habitat for late-successional and old-growth related species, including the endangered NSO, the NW Forest Plan designated approximately 7.5 million acres (30 percent) of affected public land as LSR. The NW Forest Plan directed the FS to manage LSR so that old-growth forest conditions were protected or enhanced. Programmed timber harvest in LSR was prohibited, while other activities, such as silvicultural treatment or land exchanges, were severely limited. Land exchanges involving LSR could only be considered if the exchange provided equal or better LSR habitat than current conditions.

A Regional Interagency Executive Committee, consisting of Federal agency heads, was created to ensure that the standards and guidelines of the NW Forest Plan were successfully implemented. A Regional Ecosystem Office (REO) was also formed to review proposed actions and to make recommendations to the interagency committee. In addition, the FS was directed to prepare management assessments for each large LSR within its boundaries, and to submit those assessments to the REO and the interagency committee for review and approval. All activities inside LSR lands, including proposed land exchanges, had to comply with the approved management assessments and/or the standards and guidelines of the NW Forest Plan.

#### Cascade Head Scenic-Research Area (CHSRA)

In December 1974, Congress designated Cascade Head as the first scenic-research area in the United States. The CHSRA is located within the SNF and contains approximately 6,630 acres of National Forest System lands. This area was established to provide present and future generations with the use and enjoyment of certain ocean headlands, rivers, estuaries, and forested areas, to insure the protection of significant areas for research and scientific purposes, and to promote a more sensitive relationship between man and his environment.

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<sup>3</sup> Late-Successional Reserves are forests that include mature and old-growth timber.

The CHSRA Act designated specific management areas, one of which was the Salmon River Estuary and associated wetlands. At the time the CHSRA was created, the FS owned only 1 acre of land in this area. The FS recognized that in order to restore the Salmon River Estuary to a functioning system, and to meet the intent of the Act, it would be necessary to purchase all lands within the estuary and associated wetlands area.

Some of the restoration work done by the FS in the Salmon River Estuary could be more effective if extended to adjoining non-Federal lands as well. In order to make it possible for the FS to expend appropriated funds for watershed restoration and enhancement projects on non-Federal lands, Congress included an amendment to the FY 1998 Appropriations Act (referred to as the Wyden Amendment). This amendment allowed FS to enter into cooperative agreements with willing state and local governments, private landowners, and non-profit entities, and use appropriated funds for protection, restoration and enhancement of fish and wildlife habitat, on public or private land. Congress extended this authority through FY 2001 in the FY 1999 Omnibus Act.

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## **OBJECTIVES**

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Our audit objectives were to determine whether SNF land adjustment transactions (1) met the intent of the program and any other authorizing legislation, (2) met the guidelines established in landownership adjustment plans, and (3) served the general public's best interest.

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## **SCOPE**

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The scope of our review was the land adjustment program of the SNF, and included activities occurring within the SNF during October 1995 through September 2000. Of the 15 land adjustments completed or in progress, we selected 10 of the most recent transactions for review (see exhibit A). These 10 transactions accounted for 1,149 of the 1,365 non-Federal acres targeted for acquisition during the 5 years of our scope period, and were valued at \$4.2 million of the total \$8.3 million in transactions. We noted deficiencies in one of the four land exchanges we reviewed (See Finding No. 1) and in five of the six land purchases we reviewed (See Finding No. 3).

In addition, we identified 22 conservation easements that had been purchased from 1978 through 1985 for approximately \$1.4 million. We visited 21 of these properties and observed no instances of non-compliance.

The audit was conducted in accordance with the U.S. General Accounting Office's "Government Auditing Standards (1994 revision). The audit fieldwork was performed from September 2000 through January 2001.

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## METHODOLOGY

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To accomplish our review of the land adjustment program at the SNF, we performed the following steps and procedures.

- We reviewed pertinent public laws; the *Uniform Appraisal Standards for Federal Land Acquisitions*; and FS regulations, manuals, and handbooks.
- At the FS PNW RO, we interviewed lands staff to determine their role in the forests' land adjustment program, related regional direction and oversight, and any concerns they might have. We also reviewed case files maintained at the RO relating to land transactions sampled at the SNF.
- At the SNF, we met with forest staff involved in the land adjustment program to discuss the sampled land adjustment cases and current land adjustment policies, procedures and priorities. We also reviewed the SNF's Land and Resource Management Plan, the NW Forest Plan, and documents relating to the sampled land adjustments.
- We met with the district ranger and his staff at the Hebo Ranger District, and lands staff at the Oregon Dunes National Recreation Area, to discuss land adjustment processes and issues relating to the sampled land adjustments.
- We interviewed FS review appraisers to discuss the general appraisal process as well as appraisals of the sampled land adjustments, and to identify if they had any concerns with the process.
- We interviewed an OGC staff attorney about legal issues relating to land adjustments.
- We conducted field visits of the sampled land adjustment transactions to review the property that was acquired.

- We conducted visits to properties containing conservation easements to determine if landowners were complying with the terms of the easement.

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## FINDINGS AND RECOMMENDATIONS

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<b>CHAPTER 1</b>	<b>IMPROVEMENTS NEEDED TO STRENGTHEN ANALYSIS OF LAND EXCHANGE PROPOSALS</b>
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### FINDING NO. 1

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Forest and RO lands staff's analysis of a \$1.6 million land exchange proposal was ineffective. This occurred because forest and regional lands staff did not adequately perform

their responsibilities for analyzing and reviewing the exchange proposal, and because they were not familiar with the management objectives of the NW Forest Plan. The proposed transaction, which involved a private timber company, would have disposed of FS land that harbored old-growth trees and provided critical habitat for the NSO. RO lands staff decided to reject the land exchange proposal after discussions with the NLAT raised questions about the proposal's feasibility.

The FS recently implemented additional controls over its land adjustment activities as a result of recommendations from prior OIG audits. One of the new controls, implemented in November 1998 by the NLAT, is the completion of a feasibility analysis for each land exchange proposal. The feasibility analysis is prepared by lands staff at the forest initiating the exchange, and serves as a preliminary evaluation of the proposed transaction. It must document, among other things, how the exchange proposal conforms to existing land management plans, regulations, and policy, and serves the public interest.

Regional lands staff are responsible for reviewing the feasibility analysis and recommending approval of the project if it meets the necessary requirements. The feasibility analysis is then forwarded to the RO Director of Lands for approval. The RO Director of Lands currently has the delegated authority to approve land exchange proposals under \$500,000. Proposals in excess of that amount must be submitted to the additional review and approval of the NLAT. It is the goal of the FS Washington Office (WO) to discontinue the NLAT reviews once regional lands staff have demonstrated the ability to provide the necessary guidance and oversight to the land exchange program.

Only one of the four land exchange transactions we reviewed had been initiated after the implementation of the required feasibility analysis. This

proposed transaction, known as the Lincoln City Land Exchange, involved the disposal of approximately 714 acres of FS land in exchange for a 60-acre parcel located in the CHSRA. The bulk of the FS land (520 acres) was designated as LSR under the NW Forest Plan, and partly as NSO habitat under the Siuslaw Land and Resource Management Plan. RO lands staff reviewed the proposal and recommended proceeding with the exchange. However, RO lands staff decided to terminate the exchange proposal after discussions during the NLAT review identified weaknesses in the project's feasibility.

We reviewed the feasibility analysis prepared by forest lands staff and found that it was incomplete and inaccurate. We also determined that RO lands staff's review and recommended approval of the project did not satisfy their oversight responsibilities. Finally, we determined that RO and forest lands staff responsible for developing and reviewing the feasibility analysis did not have a clear understanding of the land management guidelines established by the NW Forest Plan.

#### Forest Lands Staff's Preparation of the Lincoln City Feasibility Analysis was Incomplete and Inaccurate

The feasibility analysis prepared by forest lands staff for the proposed Lincoln City Land Exchange was incomplete and inaccurate. Specifically:

- *Forest lands staff did not determine if the proposed land exchange conformed to existing forest plans.* Although forest lands staff cited portions of both the NW Forest Plan and Siuslaw Land and Resource Management Plan in the feasibility analysis, they did not determine if the proposed land exchange *complied* with those plans. We subsequently analyzed the proposed transaction and found that it appeared inconsistent with the Siuslaw Land and Resource Management Plan because it involved the disposal of FS land that contained NSO habitat in exchange for land that had no known NSO habitat. The proposal was also potentially inconsistent with the direction of the NW Forest Plan, because it included the disposal of as much as 520-acres of Federal LSR lands in exchange for a 60-acre parcel that had no identified LSR characteristics. Proceeding with the Lincoln City Land Exchange would likely have required forest plan amendments and possible consultation with the REO. The feasibility analysis did not discuss either of these foreseeable actions.
- *Forest lands staff did not accurately describe the management objectives assigned to the FS parcels proposed for exchange.* In the feasibility analysis, Forest lands staff stated that all four of the

Federal parcels identified for disposal were classified as Group 3 lands under the Siuslaw Land and Resource Management Plan, and were available for exchange under the forest's land adjustment guidelines. This statement was inaccurate. We determined that two of the FS parcels contained Group 2 lands, which had been identified as requiring special management and were to be retained in FS ownership. We also found that forest resource staff had previously identified critical wildlife habitats on three of the FS parcels, and had assigned these lands the highest priority for retention in Federal ownership.

- *Forest lands staff did not discuss the prospective future use of the Federal lands after the exchange, and the implications to threatened and endangered wildlife.* As stated above, the majority of the Federal lands to be disposed of in the exchange transaction were identified as LSR and NSO habitat. If the land exchange were completed as proposed, the Federal lands would become the property of a timber company and would eventually be harvested. Forest lands staff did not discuss this future use of the Federal lands or the implications of logging designated LSR and NSO habitats.
- *Forest lands staff did not adequately address the presence of old-growth forest on the FS parcels to be exchanged.* In the feasibility analysis, forest lands staff noted that possible old-growth existed on only one of the four FS parcels proposed for disposal and stated that, because the forest intended to divide this parcel into aliquot parts,<sup>4</sup> it did not anticipate including the old-growth portion in the final land exchange package. However, forest lands staff did not discuss the fact that another of the FS parcels, one that was going to be included in its entirety in the final land exchange package, also contained possible old-growth.

Forest lands staff who prepared the feasibility analysis told us that he did not analyze the Lincoln City Land Exchange proposal when he completed the document, and that he did not know if the proposal complied with land management objectives and served the public interest when he submitted it to the RO for review and approval. According to the forest lands staff, he thought the function of the feasibility analysis was to document information about the land exchange proposal without reaching any conclusions. He added that he assumed the feasibility of the land exchange proposal would be determined at a later date after it had been approved for processing. Although he agreed that it was reasonable to

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<sup>4</sup> Aliquot parts are legal subdivisions of parcels into halves or fourths.

analyze a land exchange's feasibility at an early date, the forest lands staff did not think it was his responsibility to do so.

#### RO Lands Staff Did Not Provide Sufficient Oversight of the Lincoln City Land Exchange Proposal

RO lands staff reviewed the feasibility analysis prepared for the Lincoln City Land Exchange and recommended its approval, inappropriately concluding that the proposed exchange:

- was consistent with the land management objectives of the Siuslaw Land and Resource Management Plan and the NW Forest Plan;
- contained no expected adverse affects on threatened and endangered species or old-growth forests, and
- demonstrated that the public interest would be well served.

However, as stated above, the land exchange proposal appeared inconsistent with both the Siuslaw Land and Resource Management Plan and the NW Forest Plan. The Federal acreage proposed for disposal contained protected habitat that could not be exchanged under the plans unless equal or better habitat was acquired. There was nothing in the feasibility analysis to indicate that the 60-acre parcel being offered to the FS contained equal or better habitat than the 520 Federal acres slated for disposal. The RO lands staff's review of the feasibility analysis did not discuss the implications associated with the loss of the protected habitat, or the fact that the Siuslaw Land and Resource Management Plan and the NW Forest Plan would likely require amendments before the proposed land exchange could proceed. According to staff at the REO, the NW Forest Plan had never been amended to accommodate a land exchange proposal.

We questioned RO lands staff about their review of the land exchange proposal. They stated that it was the RO's policy to subject each land exchange proposal to a thorough analysis before concluding whether it complied with land management objectives, served the public interest, and appeared to be a feasible project. RO lands staff explained that the Lincoln City Land Exchange proposal had not been subjected to the customary analysis due to time constraints and the scheduled NLAT review. They acknowledged that, given the preliminary nature of their analysis, the documented RO review should not have concluded that the project complied with land management objectives and served the public interest. RO lands staff added that they considered their review of the feasibility analysis to be only one of many screening procedures the land



exchange would be subjected to, and that they would not have approved a project that did not serve the public interest.

RO lands staff stated that they decided to reject the Lincoln City Land Exchange proposal after they obtained additional information during the NLAT's review of the case. They told us that they found the oral discussions conducted by the NLAT to be an effective tool for evaluating the feasibility of land exchange proposals, and that they were considering conducting similar discussions for all future proposals, regardless of the dollar value.

#### FS Lands Staff Did Not Understand the Land Exchange Requirements of the NW Forest Plan

Although the Lincoln City Land Exchange proposal cited the NW Forest Plan, we determined that neither RO nor forest lands staff possessed an accurate or complete understanding of the land exchange requirements established by the plan. Specifically:

- RO and forest lands staff believed that Federal LSR lands could be exchanged if the FS acquired land that contained equal or better habitat for *any* species, rather than just LSR species. This assumption was incorrect. According to staff at the REO, LSR lands could only be exchanged if the FS obtained lands that contained equal or better LSR habitat, or that enhanced existing LSR habitat in some way. Proposed land exchanges that did not meet these conditions could only be pursued through an amendment to the NW Forest Plan.
- Forest lands staff thought the NW Forest Plan allowed the FS to dispose of LSR lands if those lands were difficult to administer (e.g. had limited access, were isolated from other FS parcels, etc). This understanding was also incorrect. The NW Forest Plan assigned LSR designations to specific areas of public land in an effort to enhance old-growth forest conditions and protect endangered species. Any proposed land exchange that did not result in equal or better LSR habitat would be inconsistent with the provisions of the NW Forest Plan and would require a review by the REO.
- RO and forest lands staff did not know the circumstances under which they were required to consult with the REO, and did not know that amending the NW Forest Plan would require such a consultation.

- RO lands staff thought there was confusion about the land exchange requirements of the NW Forest Plan, and that additional training in this area, conducted by FS staff with expertise in the standards and guidelines of the Plan, would be very useful.

The proper preparation and review of the feasibility analysis is an important control over the land exchange process because it allows FS lands staff to develop and initiate land exchange proposals based on land and resource management objectives, rather than reacting to externally developed proposals. Equally important is an accurate understanding of the NW Forest Plan's land exchange requirements and compliance with its standards and guidelines. If these controls are not operating properly, FS lands staff may pursue land exchanges that contradict land management objectives and that do not serve the public interest.

In the case above, the forest and RO lands staff did not use the feasibility analysis effectively. Forest lands staff did not understand their responsibility for analyzing the exchange proposal's compliance with law, regulation, and policy, while the RO review inappropriately concluded that the exchange met land management objectives when, in fact, the proposal's compliance was uncertain.

The Lincoln City Land Exchange proposal was eventually determined to be infeasible as a result of the NLAT review and discussions that occurred during that review. However, the FSWO plans to eventually discontinue the NLAT reviews. Consequently, RO lands staff are ultimately responsible for providing the necessary oversight and guidance to the land exchange program.

The RO needs to clearly identify the delegated responsibilities of lands staff executing and reviewing feasibility analyses prepared for proposed land exchanges, and communicate these responsibilities in supplemental, written direction. Written direction would increase lands staff's accountability and eliminate the confusion that currently exists regarding the preparation and content of the feasibility analysis. In addition, RO lands staff should only recommend the approval of land exchange proposals that meet land management objectives, serve the public interest, and appear feasible. If compliance with the necessary requirements is unclear, RO lands staff should supplement the information provided in the feasibility analysis with oral discussions and/or additional documentation as needed. Finally, the RO should provide training on the land exchange requirements of the NW Forest Plan to RO and forest lands staff.

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**RECOMMENDATION NO. 1**

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Clearly identify the delegated responsibilities of FS lands staff executing and reviewing feasibility analyses prepared for proposed land exchanges, and communicate these responsibilities in supplemental, written direction.

**ES Response**

The FS does not concur since written direction already exists. However, The FS WO staff have reviewed this existing direction with Lands personnel within the Region during a recent training session.

The delegated responsibilities of lands staff executing and approving the feasibility analysis prepared for proposed land exchanges has been clearly delegated to the responsible official, the Director of Recreation, Lands, and Minerals. The November 16, 1998 direction from the Deputy Chief to the Regional Foresters on the NLAT was sent to all Forests in the Region and was the subject of discussion in a March 1999, Regional Land Adjustment Workshop. The subject was again covered in detail on June 19 and 20, 2001 at the WO Land Adjustment Handbook Training in Portland, Oregon.

**OIG Position**

We accept management decision on this recommendation. Although the FS did not concur with this recommendation, we believe the WO Land Adjustments Handbook Training conducted at the RO in June 2001 achieved the desired results.

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**RECOMMENDATION NO. 2**

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Direct RO lands staff responsible for reviewing land exchange proposals to only recommend approval of projects that meet land management objectives, serve the public interest, and meet feasibility tests.

**ES Response**

The FS concurs and the RO staff has been instructed to note any inconsistency with forest plan direction and identify potential need for possible forest plan amendments when reviewing a proposal during the feasibility analysis. The RO staff will not recommend approval of future

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proposals until it has been demonstrated that all of the feasibility analysis components have been adequately addressed.

**OIG Position**

We accept management decision on this recommendation.

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**RECOMMENDATION NO. 3**

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Provide training on the land exchange requirements of the NW Forest Plan to RO and forest lands staff.

**FS Response**

The FS concurs and the WO and RO Lands Staff held a required Region-wide two day Land Adjustment Handbook training session June 19 and 20, 2001, during which time the portions of the NW Forest Plan that were particularly relevant to land adjustment work were discussed and reinforced.

**OIG Position**

We accept management decision on this recommendation.

<b>CHAPTER 2</b>	<b>OWNERSHIP AND MANAGEMENT ISSUES IN THE SALMON RIVER ESTUARY HAVE NOT BEEN RESOLVED</b>
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**FINDING NO. 2**

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FS acquisition and restoration of lands in the Salmon River Estuary have been stalled due to ownership issues. This occurred because some FS staff are waiting for further guidance

from the RO clarifying the resolution of acquisition and restoration work that can be done. As a result, FS efforts to restore the estuary and associated wetlands, an objective of the CHSRA Act, are not being wholly accomplished.

The CHSRA Act specified management direction for areas within the CHSRA, including the Salmon River Estuary and associated wetlands. The Act directed, among other things, that the estuary and wetlands be managed to protect fish and wildlife and to perpetuate the unique natural values of the area. In addition, the Act specified that, after appropriate study, dikes in the estuary and wetlands could be breached, restoring the land to its natural state.

Under the authority of the CHSRA Act, the Secretary of Agriculture developed a comprehensive management plan for the CHSRA and filed an environmental statement with the President's Council on Environmental Quality in November 1976. At the time of this filing, the FS owned only 1 acre of land in the Salmon River Estuary and associated wetlands. The environmental statement indicated that the protection and perpetuation of the unique values found within the estuary and wetlands, as directed by the CHSRA Act, made acquisition of private lands within this area a high priority. The environmental statement concluded that, in order to restore the estuary and wetlands to a functioning system, and to meet the intent of the Act, it would be necessary to purchase all lands within the estuary and associated wetlands area.

After passage of the Act, the FS began acquiring lands within the Salmon River Estuary and wetland areas. It was FS policy to acquire all privately owned lands being protected by a specific dike, then to remove that dike and restore the land to its natural state. Between 1978 and 1996, the FS removed three of the larger dikes that lay between U.S. Highway 101 and the ocean, and restored about 358 acres of marshland. Several smaller dikes were also removed or modified, and work was done to open, close or re-route channels.

However in 1998, staff from the Bureau of Land Management (BLM) surveyed FS lands located near the mouth of the Salmon River and identified an ownership issue previously undetected by FS staff. According to the BLM staff, some of the lands located within the estuary waterways were legally owned by the State of Oregon, rather than by the FS or private individuals as presumed. BLM explained that title to the beds of navigable waterways and tidelands automatically passed to the states in which these waters were located.

The State of Oregon's apparent ownership of the beds of navigable waterways and tidelands within the estuary would adversely affect the FS' ability to restore those lands to their natural state. Consequently, the FS asked OGC to render a legal opinion on this matter. In a letter dated July 29, 1998, OGC stated that ownership of beds of navigable waters, including those subject to the ebb and flow of tides, belonged to the State of Oregon. OGC further stated that even though landowners within the estuary had treated the tidelands as their own property, they remained the property of the State of Oregon. OGC concluded that appropriated Federal funds could not be used for the permanent improvement of state-owned property unless there was specific statutory authority for such use.

As a result of the OGC opinion, the RO directed the SNF to stop purchasing any lands in the Salmon River Estuary that might contain state-owned tidelands. The RO also directed the forest to not perform any restoration work on lands that they believed might be state-owned. Despite RO direction, FS lands staff remained confused about the legal ownership of parcels previously purchased by the FS and the nature of the restoration work the FS was permitted to do. For example:

- Some FS staff had the impression that the RO had issued direction prohibiting the purchase of *any* lands in the Salmon River Estuary, while other FS staff understood that the RO direction specified that only lands lying within tidal sloughs and navigable waterways could not be acquired.
- Some FS staff told us that their restoration work in the estuary was now severely limited because they were unable to identify which lands were owned by the State of Oregon and which were owned by the FS. However, other FS staff stated that their research and work had continued unabated.

The restoration and preservation of the Salmon River Estuary was clearly an intended goal of Congress when it passed the CHSRA Act. If the FS is prevented from completing certain land acquisitions and necessary restoration work within this estuary because of the present ownership

issue, it may be unable to accomplish that goal. Therefore, it is appropriate for the FS to identify alternate means to accomplish the remaining land acquisitions and restoration work necessary to meet the intention of the CHSRA Act.

We have reviewed the CHSRA Act and believe that it provides the FS with the authority that OGC referred to in its opinion. The Act directs the FS to restore the estuary to its natural state, something that can only be accomplished through additional land acquisitions and restoration work. In addition, the Wyden Amendment to the 1998 Appropriations Act<sup>5</sup> authorizes the FS to spend appropriated funds on lands that are not owned by the Federal Government if the expenditures benefit the public lands or serve the public interest. This amendment also allows the FS to enter into cooperative agreements with willing state and local governments for the protection, restoration, and enhancement of fish and wildlife habitats. As such, the Wyden Amendment appears to be an appropriate tool for the FS to use to continue restoration work in the estuary.

The RO should seek an OGC opinion as to whether the CHSRA Act represents the statutory authority necessary to authorize the expenditure of Federal funds on state-owned lands in the Salmon River Estuary. This opinion will be important if Congress does not extend the Wyden Amendment beyond fiscal year 2001. Finally, the RO should issue written direction to lands staff at the forest and district levels, clearly specifying the land acquisition policy in the Salmon River Estuary and its related waterways, and the nature and extent of restoration work that is authorized in that area.

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**RECOMMENDATION NO. 4**

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Request an OGC opinion to determine if the CHSRA Act represents the statutory authority necessary for the FS to expend Federal funds to restore lands owned by the State of Oregon

in the Salmon River Estuary.

**FS Response**

The FS concurs with this recommendation and on July 20, 2001, requested an OGC opinion on this matter.

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<sup>5</sup> The Wyden Amendment was first included in Section 334 of the FY 1998 Appropriation Act (Public Law 105-83). This authority was extended to FY's 1999, 2000 and 2001 in Section 323 of the FY 1999 Omnibus Act (Public Law 105-277).

### **OIG Position**

We accept management decision on this recommendation.

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### **RECOMMENDATION NO. 5**

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Issue written direction to lands staff at the forest and district levels, clearly specifying the land acquisition policy in the Salmon River Estuary and its related waterways, and the nature and extent of restoration work that is authorized in that area.

### **FS Response**

The FS does not concur that further written direction is warranted.

The FS annually solicits nominations for acquisition of important resource properties to be funded through the Land and Water Conservation Fund. The CHSRA would qualify for this funding and the SNF has been working through this nomination process. Nominations compete nationally in order to make the President's Budget and ultimately must compete for a Congressional appropriation.

With respect to providing written policy on "extent of restoration work that is authorized in that area", direction on use of the Wyden Amendment already exists. The Wyden Amendment allows Federal funds to be used on private land if there is a Federal benefit to the restoration. The authority to use the Wyden Amendment has been delegated to the Forest Supervisors (April 21, 1998). The Siuslaw National Forest has completed 15 projects on private sector or state owned land using the Wyden Amendment as authority — including estuary restoration work — using \$878,465 in Federal appropriations since 1998. The Forest is well versed in their ability to do restoration work in waterways and in using the Wyden Amendment.

### **OIG Position**

Although the FS has previously issued written direction relating to land acquisition and estuary restoration work authorized in the CHSRA, our audit identified a need for further clarification of these policies. In order to reach management decision, the FS needs to reemphasize its current direction to forest staff and provide a timeframe for completing this action.



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**FINDING NO. 3**

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Forest staff did not secure and remove in a timely manner unneeded structures that had been acquired through land purchases. The staff did not consider these structures to be a public safety hazard and did not have direction requiring their expeditious removal. However, four of the five structures we visited, which had remained untended for an average of 2 years, had deteriorated to the extent that they posed a risk to unauthorized users and a potential liability to the FS.

The FS occasionally acquires land through purchase or exchange that includes structures that serve no FS purpose. In such cases, the district ranger on the acquiring unit notifies the forest of the unneeded structure and requests removal. The district ranger's request is routed to a facilities engineer, who conducts a Structural and Condition Survey to determine how the structure will be removed from the FS land. The completed survey is then forwarded to a contracting officer who contracts out the work indicated and the structure is removed.

All six of the FS land purchases we sampled included unneeded structures slated for disposal. We visited these properties in October 2000 and found that five of the structures remained intact, even though an average of 2 years had passed since the parcels were acquired. We also found that four of the structures, which had not been secured or maintained by forest staff, had deteriorated to the extent that they presented unsafe conditions.

Structures Awaiting Disposal Had Not Been Properly Secured

Four of the properties we visited contained structures that were in a state of disrepair and, in our opinion, constituted a public safety hazard, with broken windows, rotting roofs and floorboards, exposed wires, etc. FS staff had not boarded up any of the structures or posted them with "no trespassing" signs. Following is a photo of one of the structures awaiting removal that the public could inappropriately access.



**Figure 1:** Deteriorating structure that the public could inappropriately access.(OIG Photo)

FS Handbook 7309.11, effective July 31, 1997, directs that unneeded structures awaiting demolition or removal be maintained to abate major health and safety hazards.

The facilities engineer agreed that structures slated for disposal should be maintained if/when they constituted a safety hazard. However, it was his opinion that only one of the four structures presented a potential safety hazard to the public, since it was visible from a highway. The engineer added that he had scheduled this structure for removal within the next 60 days and that he would board it up and post appropriate signs on the property if disposal did not occur within that time period. He further stated that he had completed Structural and Condition Surveys for the other four structures and that they would also be removed from FS land in the near future.

#### Unneeded Structures Were Not Timely Disposed Of

We concluded that the four structures had deteriorated, in part, because they had not been disposed of in a timely manner. FS staff had not removed the unneeded structures from the parcels even though, in some cases, 3 years had passed since the structures had been acquired.

NAME	DATE ACQUIRED	PROCESSING PERIOD As of 10/00
Rutledge	14 Feb 00	.7 years
Canal Creek	1 Aug 97	3.3 years
King	30 Sept 99	1 years
Otto	13 Jan 98	2.8 years
Helsing	14 Oct 97	3 years

**Table 1:** Chronology showing the length of time to complete removal of unneeded structures.

Although the FS recently implemented new controls over improvements acquired in land exchanges, current direction does not provide guidance on the timely maintenance and disposal of unneeded structures acquired through land purchases.

We conclude that unneeded structures acquired through land purchases should be promptly maintained to prevent public injury while disposal is being accomplished. Appropriate FS staff should evaluate each structure's condition at the time of its acquisition and take the necessary steps to prevent unauthorized entry and use. Further, the FS should provide direction concerning the purchase of properties that include unneeded improvements and their timely disposal after acquisition.

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## RECOMMENDATION NO. 6

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protect public safety.

In cases where the FS acquires unneeded structures slated for disposal, direct forest staff to secure the structures immediately after acquisition and to take necessary steps to

### **FS Response**

The FS concurs with this recommendation and the Regional Director of Engineering on individual cases in those instances will take necessary steps to protect public safety when unneeded structures are acquired. The September 8, 2000 letter from the Regional Director of Lands to the Forest Supervisors provides direction on how the Forests will document

their intentions. In addition, this issue was addressed in the June 19 and 20, 2001, Land Adjustment Training Session.

**OIG Position**

We accept management decision on this recommendation.

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**RECOMMENDATION NO. 7**

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Provide direction for the timely maintenance and disposal of unneeded structures acquired in land purchases.

**FS Response**

The FS does not concur that further direction is warranted. The September 8, 2000 letter from the Regional Director of Lands to the Forest Supervisors provides this direction on how the Forests will document their intentions. The Forest will dispose of these structures as proper funding becomes available. The priority use of available funds has been targeted for use on occupied buildings for public and employee health and safety items.

**OIG Position**

We accept management decision on this recommendation. Although the FS did not concur with this recommendation, we believe the FS' commitment to securing unneeded structures immediately after acquisition (See Recommendation No. 6) and the recent WO training on this issue adequately protects public safety and achieves the desired result.

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**EXHIBIT A – LAND TRANSACTIONS REVIEWED – SIUSLAW NF**

CASE NAME	TYPE OF TRANSACTION	ACRES		VALUE (\$)	
		Federal	Non-Fed	Federal	Non-Fed
Wood	Exchange	.9	55.72	418,000	418,000
Kliewer	Exchange	N/A <sup>1</sup>	97.85	355,000	355,000
Port of Tillamook	Exchange	5	4	127,000	127,000
Lincoln City	Proposed Exchange	714	60	1,600,000	1,600,000
Trust for Public Lands / Tenmile	Purchase	N/A	908	N/A	1,300,000
Borchardt	Purchase	N/A	1	N/A	92,000
King	Purchase	N/A	1	N/A	86,000
Helsing	Purchase	N/A	1	N/A	82,000
Long	Purchase	N/A	19	N/A	42,500
Otto	Purchase	N/A	1	N/A	62,000

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<sup>1</sup> This transaction was a tripartite exchange in which receipts from a timber sale were given in exchange for the non-Federal land.

## EXHIBIT B – FS RESPONSE TO DRAFT REPORT



United States  
Department of  
Agriculture

Forest  
Service

Washington Office

14<sup>th</sup> & Independence SW  
P.O. Box 96090  
Washington, DC 20090-6090

File Code: 1430  
Route To: (5430)

Date:

**Subject:** Response to Office of Inspector General (OIG) Draft Audit Report Forest Service  
Siuslaw National Forest Land Adjustment Program 08003-7-SF

**To:** Richard D. Long  
Assistant Inspector General  
Office of Inspector General

Enclosed is our response to the OIG Draft Audit Report, Siuslaw National Forest Land Adjustment Program, No. 08003-7-SF. We have also enclosed several documents that were previously discussed with the OIG but which may not have been provided during the audit.

We generally agree with the draft report findings. However, we offer some additional background information for clarification on some aspects of the Audit Report.

If you have questions or concerns, please contact our External Audit Liaison, Linda Washington, on (202) 205-1560.

CATHRINE L. BEATY  
Acting Chief Financial Officer  
Deputy Chief, Office of Finance

Enclosure

cc:  
Region 6  
Lands, Mike Williams



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**USDA  
FOREST SERVICE  
PACIFIC NORTHWEST REGION**

**OFFICE OF INSPECTOR GENERAL  
WESTERN REGION  
DRAFT AUDIT REPORT NO. 08003-07-SF  
FOREST SERVICE SIUSLAW NATIONAL FOREST LAND  
ADJUSTMENT PROGRAM  
CORVALLIS, OREGON**

GENERAL COMMENTS CONCERNING THE REPORT

We generally agree with the draft report findings. However, we offer some additional background information for clarification on some aspects of the Audit Report.

We agree that the Forest staff could have done a more thorough job in its analysis of the proposed exchange and that the Forest incorrectly described all of the Federal parcels as being classified in Group 3 (available for exchange) under the Siuslaw Plan and over 50% of lands in these parcels was actually classified as Group 2 (special management areas for retention).

When a land exchange proposal is initially formulated, it is not uncommon that substantially more lands (Federal and/or non-Federal) are included in the analysis than what may ultimately be contained in a final decision. The reason for this is that the exchange must be based on fair market value and it is anticipated that the resource analysis work done during the NEPA will cause some parcels to drop out. In the Lincoln City case, the likely amount of National Forest System Land (NFSL) involved in the final disposition would have been far less than the 714 acres identified for consideration/analysis and would have been prioritized to include the *least* impact on resources with the greatest public benefits, while balancing the market values. The feasibility analysis process is designed to be a "course screen" which is used to identify potential viability and benefits of a conceptual proposal. The Forest anticipated that further analysis would identify which portions of the lands in the proposal would be suitable for exchange.

The RO lands Staff Did Not Provide Sufficient Oversight of the Lincoln City Land Exchange Proposal

The Regional Land Exchange Program Manager completed a "Regional Staff Review" on July 28, 2000, which was an early analysis of the exchange feasibility. This was done to summarize his initial review of the feasibility analysis prior to discussions with the Forest and the initial National Landownership Adjustment Team (NLAT) review. Although inappropriate, there was no effect to the Land Exchange Program manager signing and indicating approval of this review, because Forest Service procedures require the feasibility analysis for all exchanges and provides that they be approved by the *Regional Lands Director*. In this case, the Feasibility Analysis was not signed and approved by the Director.

FS Lands Staff Did Not Understand the Land Exchange Requirements of the NW Forest Plan.

The Regional Lands Staffs are familiar with the basic requirements of the Plan and the Record of Decision and Standards and Guidelines for the NW Forest Plan. The Feasibility Analysis in Section II quotes the Land Exchange provisions from Page C-17 of the Standards and Guidelines and both the Forest and Regional staffs understand provision that exchanges in Late-Successional Reserves (LSR) will only be considered if they provide benefits equal to or better than the current condition. The Forest's Feasibility Analysis in Section VII (2) noted that the Federal properties need to be screened by the Forest biologists to ensure that the exchange was in compliance with the NW Forest Plan, **and if the proposal did not meet the requirements, it would not be supported.** Further review of the proposal by the Forest biologist was appropriate and would be made prior to committing further resources on the proposal. Neither the Forest nor Regional land staffs are experts in the complexities and interpretations of the NW Forest Plan and must rely on input from other staff specialists.

Forest Service acquisition and restoration of lands in the Salmon River Estuary have been stalled due to ownership issues. This occurred because some Forest Service staff are waiting for further guidance from the RO clarifying the resolution of acquisition and restoration work that can be done. As a result, FS efforts to restore the estuary and associated wetlands, an objective of the CHSRA Act, are not being wholly accomplished.

The Forest Service is unable to find evidence that the acquisition and restoration of lands in the Salmon River Estuary have stalled due to ownership issues. The Regional Office has advised the Forest that the estate that we appraise and pay for needs to match the estate that we will actually take title to; we find no evidence that this discussion has delayed acquisitions or restoration. The issue of ownership of the bed of the Salmon River, as identified in the BLM cadastral resurvey of the area, has been misconstrued within this investigative report. Although the BLM has not done extensive research into the issue, they indicated in their April 15, 1998, letter to the Forest Service Regional RLM Director that "it appears that the upland owners have historically claimed the sloughs as part of the government lots, which may or may not be the case."

It is clear after investigating the BLM resurvey plat, the original survey plat, and aerial photographs of this area, that the ocean tides affect all of the sloughs within the Salmon River estuary. It was also clear that the lands the Forest Service acquired, while fronting on a slough or other tidally affected area, are limited to the upland area only, and not the bed of any slough.

The local OGC office was contacted to validate the ownership issue; specifically, who has jurisdiction to the beds of tidally affected lands. Their response, dated July 29, 1998, confirmed that the beds of the sloughs in this area belong to the State of Oregon.

Forest staff did not secure and remove in a timely manner unneeded structures that had been acquired through land purchases. The staff did not consider these structures to be a public safety hazard and did not have direction requiring their expeditious removal. However, four of the five



structures we visited, which had remained untended for an average of 2 years, had deteriorated to the extent that they posed a risk to unauthorized users and a potential liability to the FS.

Lands staff with input and concurrence of Engineering facilities staff as well as property and procurement staff prepared a policy letter dated September 8, 2000, addressing this matter. The policy letter addresses acquisition of structures with respect to appraisal and title issues and highlights peripheral issues related to hazardous materials risk, responsibilities related to acquiring historical building, and general liabilities associated with eventual removal of the structures. (see enclosure)

**OIG RECOMMENDATION NO. 1:** Clearly identify the delegated responsibilities of Forest Service lands staff executing and reviewing feasibility analyses prepared for proposed land exchanges, and communicate these responsibilities in supplemental, written direction.

**FS Response** – We do not concur since written direction already exists. However, we have reviewed this existing direction with Lands personnel within the Region during a recent training session.

The delegated responsibilities of lands staff executing and approving the feasibility analysis prepared for proposed land exchanges has been clearly delegated to the responsible official, the Director of Recreation, Lands, and Minerals. The November 16, 1998, direction from the Deputy Chief to the Regional Foresters on the National Landownership Adjustment Team (NLAT) was sent to all Forests in the Region and was subject of discussion in a March 1999, Regional Land Adjustment Workshop. The subject was again covered in detail on June 19 and 20, 2001 at the WO Land Adjustments Handbook Training in Portland. (see enclosure)

**OIG RECOMMENDATION NO. 2:** Direct the RO lands staff responsible for reviewing land exchange proposals to only recommend approval of projects that meet land management objectives, serve the public interest, and meet feasibility tests.

**FS Response** – We concur and the RO staff has been instructed to note any inconsistency with forest plan direction and identify potential need for possible forest plan amendments when reviewing a proposal during the feasibility analysis. The RO staff will not recommend approval of future proposals until it has been documented that all of the feasibility analysis components have been adequately addressed.

**OIG RECOMMENDATION NO. 3:** Provide training on the land exchange requirements of the NW Forest Plan to the RO and forest lands staff.

**FS Response** - We concur and the Washington Office and Regional Office Lands Staff held a required Region-wide two day Land Adjustments Handbook training session June 19 and 20, 2001, during which time the portions of the NW Forest Plan that are particularly relevant to land adjustment work were discussed and reinforced.

**OIG RECOMMENDATION NO. 4:** Request an OGC opinion to determine if the CHSRA Act represents the statutory authority necessary for the Forest Service to expend federal funds to restore lands owned by the State of Oregon in the Salmon River Estuary.

**FS Response** – We concur with this recommendation and on July 20, 2001, requested an OGC opinion on this matter. (see enclosure)

**OIG RECOMMENDATION NO. 5:** Issue written direction to Lands staff at the forest and district levels, clearly specifying the land acquisition policy in the Salmon River Estuary and its related waterways, and the nature and extent of restoration work that is authorized in that area.

**FS Response** – We do not concur that further written direction is warranted.

The Forest Service annually solicits nominations for acquisition of important resource properties to be funded through the Land and Water Conservation Fund (LWCF). The Cascade Head Scenic Research Area would qualify for this funding and the Siuslaw National Forest has been working through this nomination process. Nominations compete nationally in order to make the President's Budget and ultimately must compete for a Congressional appropriation.

With respect to providing written policy on “extent of restoration work that is authorized in that area”, direction on use of the Wyden Amendment already exists. The Wyden Amendment allows federal funds to be used on private land if there is a federal benefit to the restoration. The authority to use the Wyden Amendment has been delegated to the Forest Supervisors (April 21, 1998 – see enclosure). The Implementation Guidelines and the Final Watershed Restoration and Enhancement Agreement template was reviewed and revised by OGC and sent to the Forests May 28, 1998 (see enclosure). It should be noted that the Siuslaw National Forest has completed 15 projects on private or state owned land using the Wyden Amendment as authority – including estuary restoration work – using \$878,465 federal appropriations since 1998. The Forest is well versed in their ability to do restoration work in waterways and in using the Wyden Amendment.

**OIG RECOMMENDATION NO. 6:** In cases where the FS acquires unneeded structures slated for disposal, direct forest staff to secure the structures immediately after acquisition and to take necessary steps to protect public safety.

**FS Response** – We concur with this recommendation and the Regional Director of Engineering on individual cases in those instances will take necessary steps to protect Public Safety when unneeded structures are acquired. The September 8, 2000, letter from the Regional Director of Lands to the Forest Supervisors provides direction on how the Forests will document their intentions. In addition, this issue was addressed in the June 19 and 20, 2001, Land Adjustment Handbook Training Session.

**OIG RECOMMENDATION NO. 7:** Provide direction for the timely maintenance and disposal of unneeded structures acquired in land purchases.

**FS Response** – We do not concur that further direction is warranted. The September 8, 2000, letter from the Regional Director of Lands to the Forest Supervisors provides this direction on how the Forests will document their intentions. The Forest will dispose of these structures as proper funding becomes available. The priority use of available funds has been targeted for use on occupied buildings for public and employee health and safety items.

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## ABBREVIATIONS

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BLM	
Bureau of Land Management.....	15
CHSRA	
Cascade Head Scenic-Research Area .....	ii
FS	
Forest Service .....	i
LSR	
Late-Successional Reserves .....	2
NLAT	
National Landownership Adjustment Team .....	i
NSO	
Northern Spotted Owl.....	i
NW	
Northwest.....	i
OGC	
Office of the General Council.....	ii
OIG	
Office of Inspector General .....	i
PNW	
Pacific Northwest.....	1
REO	
Regional Ecosystem Office.....	2
RO	
Regional Office.....	i
SNF	
Siuslaw National Forest .....	i

