File Code: 2300  Date: March 24, 2020
Route To: Regional Foresters and Station Directors

Subject: Guidance for the Operation of Recreation Services Sites and Food Services (Update 3)

This supercedes Update 2 guidance issued on 03/19/2020.

Summary of Update 3 Changes:

- Acknowledges expanded number of Statewide shelter in place orders and increased pressures on National Forest System recreation facilities and public services;
- Refines guidance on geographically defined area closures and reporting; and
- Establishes messaging and reporting coordination approaches.

The Forest Service is taking the risks presented by COVID-19 seriously. Given the rapidly changing situation, proactive and precautionary steps are essential to ensure long-term viability of the workforce and mission delivery and are based upon comprehensive and continual assessments of workplace, recreation sites, and community risk. The Agency is following OMB, USDA and CDC guidance and is using an Enterprise Risk Management framework (attachment A) to identify risk factors and mitigation measures to make risk-informed decisions accordingly. Social distancing measures and facility closures are necessary to preserve the health and welfare of Forest Service employees, partners, cooperators, our families, and the local communities in which we live.

As the number of COVID-19 cases in the United States increases and the World Health Organization has classified the COVID-19 as a pandemic, the USDA has issued guidance on visitors and food services. The USDA Forest Service is updating guidance to Agency staff for how to implement this guidance and to mitigate potential employee exposure, recognizing that site-specific decisions will need to be made by local Line Officers based upon the local situation and employee/public safety. This guidance will be updated as the situation changes.

Guidance for Forest Service Operation of Recreation and Food Service Sites

The delivery of public health and safety has been determined to be mission critical and is a focus of this associated guidance. While it is possible to offer recreation services to the public that are consistent with guidelines for maintaining public health, it must be done in a manner consistent with the Agency COVID-19 Risk Management Framework. With public use rapidly increasing across the National Forest System, even more refined assessments will be required to evaluate the tradeoffs in managing areas/facilities as closed or open for public use. Area closures may be necessary.

Forest Service risk management assessments require recreational services to adhere to public health recommendations concerning “social distancing”. This evaluation, which should involve partner organizations as practicable, is critical to inform strategies the Agency is taking to mitigate risks of exposure to both employees and the public, while not unnecessarily restricting access to National Services.
Forest system lands. In forested areas and facilities that foster dispersed recreational access such as campgrounds, day use sites, and the NFS trail system, person-to-person contact can be minimized with risk mitigations. Access by the public to those sites need not be restricted so long as sanitation measures and staffing capacity—whether Agency personnel, volunteers, permittee, or contractor, are adequate to minimize risks to public health and damage to resources. If a unit cannot meet either of these standards, consider suspending services or closing the site. When site closures alone do not mitigate public health and safety risk or align with state, regional, or local health and safety guidance/orders/requests, consider geographic defined area closures.

Certain Forest Service facilities such as visitor centers, group camping sites, and large bathroom and shower facilities are, by their very nature, designed to draw in large numbers of people. It is inherently challenging to impose restrictions on the number and behavior of visitors at such sites without compromising services, sanitation, or social distancing measures. The health and safety of visitors as well as Forest Service volunteers, permittees, contractors, resource assistants, and staff is paramount. Therefore, in order to minimize risk to staff as well as the public, visitor centers and other sites where people congregate should be closed until further notice.

Within the Agency Risk Framework, managers of Forest Service public facing recreation facilities should implement the following guidance along with CDC, state, or local guidance. Agency recreation services will be offered in alignment of local health and safety guidance, for example local curfews or shelter in place guidelines. Risk assessments and updated Job Hazard Analysis will be required to ensure appropriate measures remain in place to mitigate potential risks to Agency personnel and contractors. They will need to be continuously reviewed and decisions updated as conditions change. Expanded public notice of the latest safety guidance and services will need to reflect current risk evaluations.

The format of this guidance is tiered to match USDA Visitors and Food Service Guidance 03/17/2020 and is updated as of 03/24/2020.

A. LIMIT VISITOR ACCESS

1. Reconsider Visits
   i. For Visitor Centers and Other Forest Service Sites that Concentrate People1:
      1. Limit public visitor congregation until further notice. Close visitor centers, information offices, and associated facilities such as group bathroom facilities.
      2. Post alternative customer service approaches such as phone numbers or websites in areas where limited access has been implemented.
      3. Associated Visitor Center facilities, including outside interpretive trails, open areas, and public access points may remain open if risk assessments establish a framework for such.

   ii. For Campgrounds, Day Use Sites, and Dispersed Recreation1:
      1. Do not allow activities that congregate large groups. Close group camping sites and large visitor congregations until further notice and implement administrative access restrictions.
      2. Consider closures if operation of campgrounds conflict with local guidance or if a risk assessment deems a closure is necessary to protect employee or the community. Consider

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1 See Section A.1.iv. regarding “iv. Closure of Developed Recreation Facilities, Administrative Facilities to Public Access, or Other Permitted Sites/Activities where Visitors Congregate”
keeping sites open but with limited services based on employee capacity or human health considerations. See below - Closure of Developed Recreation Facilities and/or Administrative Facilities to Public Access.

3. Consider area closures where public safety cannot be reasonably assured through the closure of a recreation facility or where resource degradation cannot be managed through current workforce staffing.

4. Provide expanded public information about conditions, services, and restrictions using signboards and public facing websites. Where available, use highway signs and other means to communicate with the travelling public.

5. Large bathroom, shower, and other facilities that foster groupings of people should be closed.

6. Single bathrooms (SSTs, etc.) may remain open but are to be posted with cleaning schedules. When activities cannot meet safety or sanitation guidelines, limit services as appropriate.

7. Provide materials and training to staff and contractors regarding cleaning techniques, protocols, and protection, including wearing proper personal protective equipment (PPE) of public Forest Service recreation facilities. Employee safety must remain paramount and employees must follow all employee safety protocols. When activities cannot meet safety or sanitation guidelines, limit services as appropriate.

8. Increase cleaning of public areas in accordance with CDC guidelines and Job Hazard Analysis (JHA) using the following guidelines:

   - The following steps have been transcribed from existing CDC guidance on Environmental Cleaning and Disinfection Recommendations.

     - **Surfaces:**
       - If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
       - For disinfection, diluted household bleach solutions, alcohol solutions with at least 70% alcohol, and most common EPA-registered household disinfectants should be effective. If a unit does not have a suitable disinfectant, a simple diluted bleach solutions can be used if appropriate for the surface. (Prepare a bleach solution by mixing: 1/3 cup bleach per gallon of water or 4 teaspoons bleach per quart of water <NEVER MIX BLEACH WITH AMMONIA OR ANY CLEANSER>)

     - **Personal Protection Equipment:**
       - Staff should wear disposable gloves, gowns or washable layered clothing for all tasks in the cleaning process, including handling trash.
       - Gloves and gowns should be compatible with the disinfectant products being used (Consult the Material Safety Data Sheet for proper PPE requirements as additional PPE might be required based on the cleaning/disinfectant products being used)
       - Gloves and gowns should be removed carefully to avoid contamination of the wearer and the surrounding area. Be sure to clean hands after removing gloves.
       - Staff should immediately report breaches in PPE (e.g., tear in gloves) or any potential exposures to their supervisor.
• Staff should clean hands often, including immediately after removing gloves by
washing hands with soap and water for 20 seconds. If soap and water are not
available and hands are not visibly dirty, an alcohol-based hand sanitizer that
contains 60%-95% alcohol may be used. However, if hands are visibly dirty,
always wash hands with soap and water.
• Follow normal preventive actions while at work and home, including cleaning
hands and avoiding touching eyes, nose, or mouth with unwashed hands.

9. Associated facilities, including outside interpretive trails, open areas, and public access
points may remain open if risk assessments establish a framework for such.
10. Continue existing programs as appropriate, while seeking ways to minimize person-to-
person contact and the handling of cash.
11. Collaborate with recreation special use permittees and other partners to identify measures
to best comply with public health orders.
12. Consider reducing hours of operation to match diminished visitor demand and/or limited
staffing capacity.
13. Where possible, offer services online and consider other virtual methods of serving the
public.

iii. Geographic Defined Area Limitations of Service or Closures (see attached Risk Framework)
1. Use this authority only
   • To align with state, regional, county, or local requests to limit or close access to
      areas of national forests or,
   • when facility/site closures do not safely mitigate the health and safety risks to the
      public or employees or,
   • When unit capacity is compromised and cannot provide services or,
   • When extensive resource degradation is occurring.

2. Suspend/Limit agency emergency and recreation services in defined geographic areas
   through Forest Supervisor order as approved by a Regional Forester. Services may
   include patrols, facility cleaning, trash pick up, and developed recreation opportunities.
   Post and Notify the public upon entry of changed risk conditions and service limitations.
3. Issue Emergency Forest Supervisor Closure Orders closing a defined geographic area to
   entry or restricted entry as approved by Regional Forester.
4. Use of these authorities requires post decision reporting through the Regional Pandemic
   coordinator (or other appropriate staff) to the National Pandemic Coordinator.

iv. For District Offices and Other Locations where Recreation Services are Scheduled and
    Conducted:
1. Close public spaces, offices, limit exposure for public facing employees, and practice
   social distancing.
2. Where possible, conduct all day-to-day permit processing over the phone, by US mail, or
   via email.
3. Devise alternatives for procedures that currently require physical interactions, such as
purchasing firewood permits.

4. When physical transactions must take place, consider using strategies that do not require people to enter each other’s personal workspace, such as leaving forms in secure drop boxes.

5. Consider suspending the issuance of new permits that would require day-to-day oversight from an FS employee.

6. Remind permittees that they must conform to advisories issued by State and local organizations regarding maximum number of participants at a gathering, etc.

v. **Closure of Developed Recreation Facilities, Administrative Facilities to Public Access, or Other Permitted Sites/Activities where Visitors Congregate:**

1. When making closure determinations and implementing associated actions, monitor and evaluate specific direction provided in local or State “Shelter in Place” or similar orders affecting the area where the facility or permitted activity is located.

2. Assess the risk of managing a closure in light of the risk of managing the area or facility as open. Document that risk and rationale.

3. Closely coordinate with State and Local partners, permittees, and volunteers as risk decisions are being considered.

4. Developed recreation facilities and/or administrative facilities where members of the public typically congregate may be closed to prevent congregations of visitors, promote social distancing, and protect those who operate and maintain these facilities. As indicated in the sections above, these determinations are made by the local line officer within the Agency Risk Framework. In event that a determination is made to close such a facility:
   - Unit line officers should use their discretion on how to implement facility closings based on local situations.
   - Restrooms should be closed and locked, and trash receptacles removed, to the extent practicable to avoid collections of refuse and waste. We recommend posting “Pack It In / Pack It Out” signs to encourage visitors not to leave refuse and waste.
   - Periodic monitoring of recreation facilities and sites is expected to address public health, safety and natural resource concerns that may arise as a result of these closures. Personnel conducting these monitoring and related response activities should follow CDC guidance, follow all appropriate health and safety procedures, utilize PPE, and follow local or regional job hazard analysis (or equivalent document) which establishes COVID-19 human interaction mitigation guidelines.
   - Develop consistent messaging and communication plans for each unit that tiers to Regional and National guidance. Proactive messaging encouraging the public to “pack in, pack out” any waste, maintain social distance, and be flexible about available services will be included in this communication plan.
   - Consider the needs of volunteers and hosts in light of facility closures. They may be allowed to stay if risk assessments allow for adequate social distancing and safety guidelines to be met and as long as adequate oversight and accountability can be maintained.

3. Regarding consideration of permitted recreation sites/activities, take appropriate action for permitted sites/activities included as allowed under State or local shelter in place orders.
   - Closely coordinate with permittees as risk assessments are completed.
If applicable, issue permit suspension letter (using the national sample letter) when permittee requests it or to document direction when the permittee disagrees with the closure direction.

Consider the needs of camp hosts in light of facility closures. They may be allowed to stay if risk assessments allow for adequate social distancing and safety guidelines to be met and as long as adequate oversight and accountability can be maintained.

2. Schedule and Screen

i. For District Offices and other locations where recreation services are conducted for walk-in services:

2. Where possible, make all visits by appointment only.
3. If security personnel are not regularly available, keep doors locked to prevent unscreened individuals from entering.
4. All visitors should be screened using the USDA “Visitor Health and Travel Questionnaire” prior to being admitted to Forest Service facilities.
5. Post screening questions and phone numbers adjacent to entryways so visitors can request entry.
6. When possible, screening questionnaires should be filled out and submitted in advance of the visit to properly screen visitors and expedite the process.
7. Visitors should not queue in line to seek access to offices. Provide opportunities for visitors to maintain social distancing by, for instance, encouraging them to wait in their cars until they can be served.

B. ESCORT REQUIRED

i. For District Offices and other locations where recreation services are conducted:

2. Visitors should not be allowed to access any locations on the site other than those directly relating to the reason for their visit.
3. Escort personnel need to follow recommended social distancing recommendations.

C. FOOD SERVICE

1. Cafes and cafeterias at Forest Service facilities must discontinue service to the general public, but may continue to offer services to Forest Service employees and partners as appropriate, subject to USDA guidance.

D. ONSITE BUSINESSES/RETAIL

1. Work with permanent vendors, and other permit holders, at Forest Service facilities to implement this guidance and limit congregations of people. Vendors and permit holders may remain open, as appropriate, if they are operating in accordance with this guidance or as agreed upon with a local line officer in consideration of local health guidance.
2. Maintain open dialogue with any partners who operate in or around Forest Service facilities, including Interpretive Associations.
E. COMMUNICATIONS WITH THE PUBLIC

1. Provide frequent updates to the public in a variety of media (i.e., recorded messages, signage, social media announcements) regarding topics like availability of services and updated cleaning schedules.

2. In communications with the public, officials should emphasize that the health and safety of Forest Service volunteers, contractors, resource assistants, and staff is a top priority, while acknowledging the limits of federal workers’ ability to guarantee COVID-19-free environments.

3. Where applicable, direct the public to online resources for information needs, pass sales, and permits.


CHRISTOPHER FRENCH
Deputy Chief
National Forest System
Attachment:

**Topic:** USDA Forest Service Enterprise Risk Management of COVID-19 for Recreation Services and Area Closures
**Date:** March 23, 2020

**Contact:** Chris French, Deputy Chief National Forest System
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**Issue Summary:**
The USDA Forest Service remains operational and we are committed to provide mission critical services in a manner consistent with OMB guidance to prioritize slowing the transmission of COVID-19.

Across the National Forest System we are seeing increased visitation, camping, and congregations that are compromising local, regional, and state health restrictions or unit capacity to maintain these areas. Agencies, governors, and local decision makers are closing recreation facilities that is resulting in increased pressures on Forest Service administered sites. In addition, we are seeing unusually large numbers of people locating themselves away from urban centers to National Forest System lands.

This increasing pressure is causing critical health and safety concerns that include the inability of the agency to properly sanitize facilities and overcrowding of facilities beyond their capacity. This over capacity, combined with the closure of designated facilities in surrounding jurisdictions, is creating resource and facility degradation. Increasingly, the ability of the agency to adapt to this dynamic situation is limited as it lacks the proper Personal Protective Equipment to effectively manage our facilities and dispersed recreation areas. Across the agency we are seeing a marked increase in requests to provide for larger closures tied to reports of overcrowding and workforce fear of exposure. In addition, we are receiving state level requests to close facilities or entire geographic specific areas in order to limit the continued exposure of COVID-19.

OMB, Department, and agency guidance provide for providing alternate service delivery, limiting services, and closing site specific facilities when employee or community health and safety cannot be ensured. They do not address regional or geographically defined area closures. With overcrowding and visitor use intensifying, it is compromising the agency’s ability to adhere to OMB guidance, social distancing standards, and local health and safety restrictions.

The Agency has activated risk-based policies and procedures to facilitate decision making across scales consistent with OMB recommendations to streamline and delegate decision-making. The attached risk management framework describes local decision makers the ability to provide Area Based service suspension or geographic specific area closures analogous to forest closures associated with wildfire risk. These actions must be coordinated with local and federal law enforcement before being enacted.
This risk framework ensures that our response to the COVID-19 will be based on continual assessment of risks and customer and workforce needs, along with prioritization of core delivery functions. Our immediate response is focused on three mission critical areas:

1. Agency COVID-19 response
2. Law enforcement and public safety
3. Wildfire response

This risk framework - Recreation Area Limitations and Closures – further implements mission critical areas #1 and 2.
We plan immediate implementation of the following risk-based decision protocols for the continue delivery of our recreation public service functions. We will work with line officers nationwide to ensure local decision makers understand and effectively deploy these protocols in a consistent and timely manner, with continual assessment of risk and mission needs.

### Framework 1: Specific Site/Facility Service Alteration, Suspension, or Closure

#### One or More Triggers to Limit or Suspend Services, Close Specific Facilities

- Government declared outbreak of COVID-19 in the US or near a USDA facility
- State, County or local government has imposed COVID-19 public health restrictions/guidance
- Site specific Risk Assessment finding of Employee or Public Health Risk

#### Sustain Employee and Public Health
- Ensure employee and community health safety
- Close visitor centers, campgrounds, group camping areas, group bathrooms, or other facilities that cannot meet social distancing requirements, sanitation requirements, or meet local, regional or statewide health restrictions.
- Train and equip employees with proper PPE to carryout public services (ie bathroom cleaning, trash pickup, fee collection). Suspend services proper PPE cannot be attained given local risk.
- Realign individuals and work units to support mission critical activities and mission continuity
- Explore other ways to accomplish, or postpone if necessary, all non mission critical functions that require face-to-face interaction

#### Continual Assessment of COVID-19 Risk and Mission Needs
- Develop specific risk protocols for recreation sites and areas,
- Update decision frameworks to meet employee and decision maker needs
- Communicate and coordinate with partners and cooperators
- Reevaluate opportunities to expand/contract operations as conditions warrant

#### Adhere to OMB Guidance
Adhere to guidance in USDA COVID-19 PLAYBOOK v2.0:
- Adhere to Agency guidance for recreation and food service delivery
- Adhere to Local, Regional, and Statewide health and safety restrictions

#### If risks cannot be mitigated, unit capacity is compromised, or local health restrictions conflict
- If site closures do not limit public/employee health concerns

#### Go to Framework 2: Geographically Defined Area Based Limitations or Closures (below)

**Mission/Agency Pandemic Coordinator** submits information on workplace risk, community risk, and proposed actions to **USDA Pandemic Coordinator**
Framework 2: Geographic Defined Area Limitations and Closures

Site Specific Closures do not mitigate community or employee health and safety risk

Triggers for Geographic Define Area Limitations and Closures

- Shelter in Place Orders/Curfews/Public Social Restriction/Quarantine
- Multiple site specific facility closures do not limit public congregations
- Conditions prevents employees from safely traveling to or performing work duty
- Other state and federal agencies close area or multiple facilities
- Increased numbers of visitors, campers, or other users compromise social distancing, public health restrictions, or result in extensive resource damage.

Suspend Services or Close an Area
- Suspend/Limit agency emergency and recreation services in defined geographic area. Services may include patrols, facility cleaning, trash pick up, and developed recreation opportunities. Post and Notify the public upon entry of changed risk conditions and service limitations.
- Issue Emergency Forest Closure Order closing a defined geographic to entry or restricted entry.
- Report area wide decisions through regional/national pandemic coordinators

Continual Assessment of COVID-19 Risk and Mission Needs

Mission/Agency Pandemic Coordinator submits information on workplace risk, community risk, and proposed actions to USDA Pandemic Coordinator.