



NATIONAL WILDERNESS STEWARDSHIP ALLIANCE

Building a Wilderness Stewardship Community

August 17, 2015

USDA Forest Service
Attn: Jonathan Stephens
Recreation, Heritage and Volunteer Resources
201 14th Street SW
Washington, DC 20250

RE: National Saw Policy Program Comments

I am writing on behalf of the National Wilderness Stewardship Alliance (NWSA) regarding the proposed directive for the U.S. Forest Service's National Saw Program Policy. NWSA appreciates the opportunity to comment on the proposed directives.

First and foremost thank you to the U.S. Forest Service (USFS) for taking action to make much needed improvements to the national saw program, and for the opportunity to provide comments on the proposed National Saw Program Policy. This proposed policy has been a long time in coming to fruition, but is essential for volunteers and cooperators to operate without barriers to accomplish successfully much needed stewardship work on the National Forest System. As you remember NWSA has been pushing for this policy from at least 2010.

The NWSA is a non-profit organization building a nationwide network of volunteer organizations that provide stewardship for America's enduring resource of wilderness. Our vision is to see each wilderness area within the National Wilderness Preservation System adopted by a wilderness stewardship organization dedicated to protecting, restoring and nurturing the area's wilderness. All of these organizations need the ability to have consistent application and interpretation of a saw policy as well as access to saw certification and training programs.

Safety is paramount for volunteers working in Wilderness areas; the NWSA, in conjunction with our agency partners and programs, work to provide the best possible crosscut saw training and certification courses for volunteers. In the future we wish to provide qualified saw training to our member organizations and to see their trainings recognized by the USFS.

NWSA and our agency partners recognize and support the essential roles of non-profit staff and volunteers in the construction, operation and maintenance of trails in Wilderness areas. The quality training and safety of all Wilderness volunteers is a principal concern of both agencies and the NWSA. The use of crosscut saws has been frequently and routinely required of NWSA volunteers in order to accomplish their roles. Agency partners and the NWSA recognize that a consistent, nationally program for the training and certification of crosscut saw operators is necessary to ensure the safety of all volunteers.

NWSA supports in general the new National Saw Program Policy as it has universal standardized application across the entire National Forest System and recognizes volunteer and cooperators as full, equal partners in training and certifying volunteers. We appreciate that qualified volunteers would be placed on even standing with agency personnel and contractors. This must continue to be the main theme of the policy as it becomes final.

Our comments are arranged as a review of what is contained in the Proposed Directive for the National Saw Program Policy with recommendations for corrections, improvements, and clarification.

FMS 2300

NWSA recommends this program should remain in 6700 Safety and Health Program. All principal authorities and regulations listed for National Saw Program are all safety related and managed by the Safety and Health Program. It has been successfully develop and administered in the 6700 series throughout the history of the Forest Service. The saw program is no different in terms of safety-related oversight than check in/check out, job hazard analysis, blood borne pathogens, hearing conservation, or any number of other safety-related programs where employees, volunteers and cooperators are performing duties. Relocation to the recreation program does not create the agency wide program emphasis that one would expect with an agency that promotes a safety culture in fire, recreation, wildlife, boundary management, and vegetation management – all of whom use saws on a frequent basis. Because several USFS program areas are likely to manage the saw program keeping it in 6700 provides an overall context and can prevent the program from becoming sidetracked as the province of one or another program.

Page 3, Section 2358 – Saw Program

Nationally, countless volunteer and service programs perform stewardship activities not only on National Forest System lands but also public lands managed by the Department of Interior (USDI). We ask the USFS to provide greater clarity on how the proposed policy would handle saw training and certification cards issued by Department of Interior agencies including the National Park Service (NPS) and Bureau of Land Management (BLM). We understand NPS is currently designing a new Standard Operating Procedure for NPS Chainsaw Safety Program for Non-Wildland Fire Operations but does not address crosscut saw use and certification. The BLM does not have a national saw policy; instead it delegates the task to individual BLM state officials. The USFS saw program and the draft NPS saw program are not compatible in numerous ways. Consequently, we see the discrepancies between agency policies and lack of collaboration between agencies in developing saw programs and reciprocity for certification cards as a critical concern for volunteer and service programs working across national public

lands. We recommend the USFS add a provision to the policy to accept saw certification cards issued by NPS and BLM as well as direct the USFS to collaborate with Department of Interior agencies to develop a consistent interagency saw program policy approach for certifying sawyers. However we do not want the USFS to delay finalization and implementation of this policy as it seeks collaboration with USDI. Instead complete the existing directive and then work with USDI to develop more consistent interpretation and implementation of a saw program that works across the agencies.

Page 4, Section 2358.03 – Policy, Item 6:

The draft policy states “Crosscut sawyers should be at least 16 years of age.” We believe that the policy should be definitive on any age restrictions. However, we recommend the age restriction be lowered to 13. Crosscut saw work is an ideal way to engage volunteers at a young age in learning and appreciating this traditional skill. Many youth volunteers that work with NWSA are younger than 16. We support and recommend that all youth volunteers age 18 and under are required to always be under trained adult supervision when assisting A, B or C Sawyers. At a minimum younger sawyers should be allowed in the role of Sawyer Trainee for simple bucking under the supervision of a certified sawyer.

Page 6, Section 2358.04b – National Saw Program Manager

This section identifies the responsibilities of a National Saw Program Manager which we feel is an integral position to the ongoing success of a safe, consistent national saw training and certification for both USFS staff as well as volunteer and service programs. Additionally, the Program Manager will be beneficial to assisting larger volunteer and service programs, such as those found in the National Wilderness Preservation System, that cross multiple USFS regions. This position is critical to the successful integration of policy, improving national training and foundational in building success with partners, USFS staff, and other agencies. We recommend this national management position be permanent and at least half time. We are troubled to hear that this position, which is not yet filled, might only be considered a 2 year term position. We are convinced it will be a needed position long into the future. In fact it is needed now to bring this policy to completion and to implement it in a timely manner. We ask that you begin the process of filling this position immediately.

Page 6, Section 2358.04c – The TAG

We recommend adding at least one representative from the volunteer and service community to the Technical Advisory Group (TAG) as an ad hoc member to represent stewardship views on saw program issues. The representative would offer a unique skill as volunteer-related subject matter expert and complement the skills of other TAG member in developing and coordinating trainings, skills, and safety for all aspects of non-fire saw operations.

This section states “the TAG recommends NRSTCs to the National Saw Program Manager.” However, the policy is unclear as to who or what body is the actual decision maker in approving Nationally Recognized Saw Training Courses. If the decision maker is the TAG, the policy needs to state this and what number of TAG members need to agree to approve a NRSTC. We feel that there are a variety of sawing techniques and skills that vary across the nation and that there could be a challenge for volunteer and service programs to be approved by consensus of the entire TAG.

Page 11, Section 2358.041 – Sawyer Evaluators, Item 2:

This section identifies that Sawyer Evaluators input data to a National Sawyer Certification Database. It is imperative that volunteer and service partners as well as other agencies such as NPS and BLM have access to this database to enter Sawyer Training and Field Evaluation forms in a timely manner and to access data to verify an individual sawyer's credentials, as we will continue to be responsible for the certification of our volunteers. In our past experience, it is unrealistic to expect already overburdened USFS employees to enter and access data on our behalf in a timely manner.

Page 14, National Sawyer Certification Card

The section states that cards issued to a sawyer qualifies a sawyer to work on National Forest System lands with restrictions. The policy needs to state explicitly that cards are to be accepted on all NFS lands without geographic or regional restrictions to alleviate the current challenge of the card not being accepted from Forest to Forest or Region to Region.

Page 14, Nationally Recognized Sawyer Training Course (NRSTC)

We recommend that the list of nationally recognized training classes be maintained on a USFS website accessible to all groups. We also think it is imperative that the process for reviewing and accepting training programs by volunteers and cooperators be identified. Accepting volunteer and cooperator training sessions using NRSTC course materials is critical to the success of this program.

Page 15, Volunteer

We recommend strengthening language that volunteers have the same opportunities and requirements for levels of authorities and certifications as federal employees for saw use.

Page 16, Section 2358.06 - Qualifications

This section states that "certifying officials must verify successful completion of required training and a sawyer training and field proficiency valuation" and that a certification card will be issued from the National Sawyer Certification Database. In addition to the paramount need for volunteer and service partners to access the database, we are concerned with the timeline that would be required with issuance of the National Sawyer Certification Cards. While we understand the advantages of entering sawyer information into a national database, we are very concerned that this will result in a delay in our volunteers receiving their cards. At present, NWSA's training and certification program ensure volunteers receive cards within two weeks of attending training. This quick turn-around time enables our volunteers to perform much needed sawyer duties almost immediately. We suggest that sawyer cards be in a form which can be immediately issued at the completion of qualifying training. This will streamline the issuance process and alleviate delays of processing cards after training sessions are completed.

Page 17, Training, Knowledge and Skill Requirements

The requirements for a successful NRSTC should be identified in this section. It is essential to standardize the training requirements and curriculum for NRSTC courses to ensure consistent application around the country. Identify existing acceptable NRSTC courses in this section. Limiting NRSTC's to only USFS authored and delivered programs defeats the purpose of

accepting qualified training from volunteers and cooperators that meets all the elements of quality saw training. A process of evaluating existing volunteer and cooperator training should be identified so it can be added to the NRSTC listing.

Page 18, Section 2358.1- Exhibit 02, Crosscut Sawyer Trainee:

We recommend the First Aid and CPR prerequisite be eliminated for Crosscut Sawyer Trainees. For many volunteers being the “second person on the saw” is an excellent training introduction to this traditional, widely unknown, tool and piquing their interest in becoming a fully certified sawyer. Adding this requirement puts an undue time and financial burden on volunteers and volunteer and service programs to have this certification. The Trainee is performing under the direct supervision of a certified sawyer who is fully certified.

The USFS training manuals state “new sawyers should master the skill of single bucking before learning double bucking.” We recommend the removal of the restriction “May not single buck” because single bucking is considered safer than double bucking, as well as the cutting is taking place under direct supervision of a fully certified sawyer.

Page 17, Section 2358.1:

While we support the removal of size/diameter restrictions on sawyer levels, in various locations the policy uses “minimally complex, low complexity, and advanced complexity” terms, which are subjective descriptors that could result in variable and inconsistent interpretations between volunteers and employees. We recommend the addition of a matrix as a guideline to illustrate suggested complexity levels for sawyers.

We recommend eliminating “Total Training” requirements from the certification levels and instead provide the minimum baseline of needed training for each level. The “Total Training” requirement confuses this requirement and may create barriers to successful certifications.

Page 19, Section 2358.1 – A Sawyer:

We recommend the addition of an “A Sawyer – Bucking Only” category. The intent here is to provide a companion certification for the Bucking Only category of B and C sawyers. Volunteer programs have a substantive focus on bucking only operations in a non-fire management context. As such, we feel it should be clearly stated that an A card may be issued for bucking only.

Page 22, Section 2358.1, Exhibit 02, C Sawyer – Bucking Only:

We recommend establishing minimum instruction and proficiency levels for C level certifications. As presented the policy creates an inherently subjective certification process that could be a barrier to certifying volunteers and cooperators resulting in variable standards between volunteers and employees.

The draft policy states two Sawyer Evaluators are required to determine C Sawyer – Bucking Only proficiency. Currently, C Sawyer – Bucking Only certifications in volunteer programs are being certified by one evaluator. We recommend changing the draft policy to require only one evaluator particularly in light of personnel and financial limitations that could be encountered in ensuring that two sawyer evaluators are available and present during all such certifications especially in rural, remote areas.

Page 24, Section 2358.1 – Exhibit 02, C Sawyer Evaluator:

We recommend the addition of a “C Sawyer Evaluator – Bucking Only (not applicable in the fire management context)” category. The intent here is to provide a companion certification for the Bucking Only category of A, B and C sawyers.

Page 25, Section 2358.21 - Sawyer Training and Field Proficiency Reevaluation:

Policy states that “The National Sawyer Certification Card is valid for three years and is subject to review any time prior to expiration.” In practice, many forests and regional policy supplements are requiring that volunteer sawyers undergo a recertification process annually. The policy should clearly define certifications are valid for three years without annual recertification each year and may not be changed by regional policy supplements. Leaving this decision to individual forests creates undue inconsistencies across the system and inefficient impediments to fully utilizing trained and qualified volunteers to accomplish much needed work on National Forest System lands.

As presented the policy fails to address skills and proficiency required for Sawyer Instructors and Evaluators for recertification. This creates an inherently subjective recertification process that could be a barrier to certifying volunteers and cooperators resulting in variable standards between volunteers and employees.

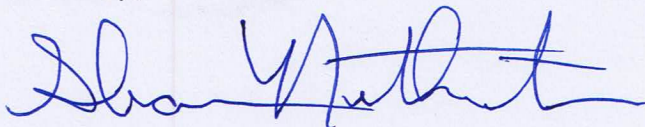
Page 27, Section 2358.3 – Exhibit 03 – Form FS_2300-52:

Some volunteer and service programs focus almost exclusively on bucking only operations and evaluations, requiring field evaluation forms with more than a third of the form dedicated to felling certifications adds undue complexity to Evaluators certifying bucking only sawyers. We recommend the addition of bucking only evaluation forms or a method of approving other evaluation forms.

In conclusion, NWSA welcomes the new national saw policy and are excited to see it soon implemented for the benefit of volunteers, partners, cooperators, and the agency. Our volunteer sawyer instructors and evaluators are eager to work side by side with USFS staff at training and certification events.

Thank you for the opportunity to be involved in the review process for the proposed National Saw Program policy, and for your careful consideration of our concerns and proposals. We look forward to continuing and strengthening our partnership with USFS.

Sincerely,



Shaaron Netherton, Chair
National Wilderness Stewardship Alliance