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To: David C. Childs A-76comments/OMB/EOP@EOP

cc:

Subject: Draft A-76 Comment

As a USDA Forest Service employee and president of Local Lodge 1781 of the National Federation of Federal Employees, I have mixed emotions about the administration's proposed changes in laws that effect USDA Forest Service actions. That being said, I have a great concern that while the Agency and the Administration are justifying so many actions in the name of preventing catastrophic wildfire, the current Administration direction on competitive sourcing is essentially nullifying those actions.

More specifically, Agency employees are essentially managing intangible natural resources (e.g., scenic vistas, riparian habitats, meadow complexes). In doing so those employees are multi-taskers. As an example, fire crews often brush roads or clean-up trash and human resource employees, wildlife biologists, and road maintenance personnel can all end-up on the fireline; they comprise what the the Agency calls their "militia." These employees have an intrinsic knowledge that has been developed by working "in the woods" and is a great benefit to the Agency in managing natural resources and dealing with emergencies. For instance, if a fire breaks at 4:15 PM on any given ranger district, chances are high that by 4:30 10, 20, 30, 40+ people will be in route to the fire and because they know the area, they probably won't need detailed directions to get to it. The reality is that the government land management agencies are some of the best agencies in the world when it comes to managing natural resource "incidents" and the reason they are so good is because their employees have a wide spectrum of skills.

The problem is that the current direction on competitive sourcing contained in both the existing and proposed OMB A-76 circulars, forces these same agencies to analyze their workforce on the basis of economic efficiency that will require the agencies to view employees as single taskers. Thus, in my opinion, the end result of these A-76 studies will be to reduce the effectiveness of the our nation's land management agencies to respond to incidents such as wildfire, particularly in the "off season."

I also would suggest that in addition to reducing the effectiveness of land management agencies to respond to incidents, the existing and proposed OMB A-76 studies fall short in being able to assess the economic value of our present government land management workforce. As previously mentioned, most USDA Forest Service employees have a broad range of skills and are multi-taskers; they acquire the skills and they do what it takes to get the job done. In a contracting environment, any deviation from the contract is going to require a "change order" and those "change orders" are where the contractors make their money.

Another facet of the privatization of federal jobs is the whole worker benefit issue. Based on past experiences, it is doubtful that the successful bidders will employ union labor or pay benefits. Given that a number of USDA Forest Service employees live in smaller communities, there could potentially be some adverse impacts on local health care systems, both from the employees that were displaced and the contractors that may move into the area.

**Now, relative to the proposals in the new draft of the A-76 circular, I can only say that shortening timeframes will exacerbate any problems of privatization of USDA Forest Service activities - I can only say that more homes will burn and more people will die because OMB will be in the driver seat and neither they or most any other DC official (or the USDA Forest Service contractor driving the Agency A-76 studies) have a clue as to reality for on the ground for USDA Forest Service workers. Shortening the 3-year timeframe to 1 year will insure more homes will burn and more people will die because of the inability to thoroughly analyze the work situation. Giving OMB authority to directly contract out if the timeframes are not met will insure more**

**homes will burn and more people will die because OMB will not have a clue as to true functionality of the Agency workforce. Eliminating union appeal rights will only insure more homes will burn and more people will die because, despite administration propaganda to the contrary, federal unions do represent workers and do want to promote efficiency... AND WE DO NOT WANT TO SEE PROPERTY OR PEOPLE BURN!**

It is about time the current administration and OMB realize their ideas of A-76 and the FAIR Act are unrealistic, self-serving, and will result in disastrous impacts to our great nation's nationally managed lands. It is about time the current administration and OMB realize that DOI and USDA Forest Service workers are not assembly line workers and both the present and proposed A-76 circular criteria, when applied to land management agencies, is akin to forcing a round peg into a square hole. IT WON'T WORK! HOMES WILL BURN - PEOPLE WILL DIE - AND THE CURRENT ADMINISTRATION AND OMB WILL BE TO BLAME BECAUSE THEY COULDN'T SEE - REFUSED TO SEE - THE FOREST FOR THE TREES.

...as in the words of Liz Gumpton in the Missoulian

***"Let's see if we understand this right: First, take a relatively uncomplicated task like searching people at airports (for bombs, guns, knives, scissors) and create a new federal workforce because contractors weren't getting the job done well. Next, take the very complex management of public resources - forests, wildlife, watersheds - and study those jobs to see how many of them could be privatized (Missoulian editorial, Nov. 27). Does this maneuver make sense? Not if the goal really is to save the taxpayers money and to make the government more efficient."***

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