



NATIONAL FEDERATION OF FEDERAL EMPLOYEES

Affiliated with the International Association of Machinists & Aerospace Workers, AFL-CIO

December 19, 2023

Undersecretary for Natural Resources Homer Wilkes
U.S. Department of Agriculture and U.S. Forest Service
1400 Independence Ave., S.W.
Washington, DC 20250

Re: Housing in the Forest Service

Dear Undersecretary Wilkes,

By letter dated July 11, 2022, to you, Secretary Vilsack and Chief Moore, we alerted you to the housing crisis within the Forest Service and shared several recommendations on how to end it. Secretary Vilsack has made clear his goal that federal employees in your department and mission areas are safe, housed and healthy. Thank you for devoting staff time and resources to improving housing. In partnership, we have pinpointed actions you and the Secretary could take immediately- yet to date we stand in limbo. We urge you to take the following actions right now during this unique moment of opportunity to fix the housing crisis in the Forest Service.

1. Include in your 2025 Budget Request programmatic funds that reflect the actual cost for all identified and anticipated housing needs. USDA did not request nearly enough funding in the 2024 budget process. OPM included a portion of what is truly needed in the President's 2024 Budget Request because of NFFE's advocacy direct to OPM on the issue. Please do your part this cycle and we will support it.

At least \$360 million must be appropriated specific to housing simply to catch up on deferred maintenance. Budget for added FTE slots to hire forest engineers and facilities staff to keep up with regular upgrades and to build new buildings to replace condemned housing. Please demonstrate by your budget request that this administration prioritizes hygiene, health, and safety of employees who occupy government housing. We will support it.

2. Implement our joint initiative to refund 65% of the housing cost burden to approximately 3,000 government-owned housing renters. Last year, we requested rent be waived until repairs can be made to make housing safe and livable, but this rent reimbursement is the solution fully within your authority and achievable now. This reimbursement will assist employees who have the greatest financial need. We will not rationalize or condone any further delay.
3. Request OMB rescind and reissue Circular A-45. The Circular unduly restricts Agency's from making government housing truly affordable and is out of step with the Biden Administration's policies on housing more broadly. The OMB must abandon this outdated economic policy piece, revisit its flawed statutory interpretations, and stop exacerbating the housing crisis by leaving the circular in place. The Agency must articulate to those with authority at OMB exactly how this Circular is impacting employees. To the fullest extent, please amplify and reinforce NFFE's efforts

to lift this barrier to affordable housing for federal employees.

4. Negotiate additional housing solutions with the Union at Master Agreement Negotiations in January 2024. The Union identified multiple interests and proposed solutions for housing problems in Article 29 of the Master Agreement. Please approach negotiations with full resolve to bargain and establish contractual rights to stability, choice, equal opportunity, modern technology and safety and in housing. We ask the Agency to increase transparency in how employees' money paid towards rent is being used by the Agency. Our goal is to conclude negotiations in January and implement the Master Agreement in Spring 2024.

Thank you for consistently listening to our members and making the effort to end the Forest Service housing crisis. We look forward to continuing to work with you on this issue and the many others for the betterment of employees we care about and represent.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Erwin', with a stylized flourish at the end.

Randy Erwin
National President/DBR
National Federation of Federal Employees
IAMAW, AFL-CIO



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July 11, 2022

Agriculture Secretary Tom Vilsack
Undersecretary for Natural Resources Homer Wilkes
Forest Service Chief Randy Moore
U.S. Department of Agriculture and U.S. Forest Service
1400 Independence Ave., S.W.
Washington, DC 20250

Re: Union Recommendations for Housing in the Forest Service

Dear Secretary Vilsack, Undersecretary Wilkes, and Chief Moore,

The National Federation of Federal Employees (NFFE) is a national union representing approximately 110,000 government workers across thirty different agencies in the United States, including thousands of employees within the United States Forest Service within the Departments of Agriculture. We appreciate the opportunity to share our recommendations on how to solve the housing crisis within the Forest Service. Our members and NFFE leadership greatly appreciate your commitment to find a way to fix the dire housing situation permanently.

As you know, the housing problem in the Forest Service is fundamentally about dignity. Forest Service employees deserve to have a safe, affordable, and reliable place to live but many do not. Your employees and our members have shared these acute observations on the Forest Service housing crisis that negatively impacts a sense of dignity in the workplace and impedes recruitment and retention efforts:

- Employees are living in their trucks, vans, hammocks, or are “couch-surfing” while working for the Forest Service. This is most often not by choice but out of necessity.
- No government housing is available to employees in some locations. Private rentals are scarce and unaffordable in many locations. There is no housing stipend now for Forest Service employees.
- Existing housing is dilapidated and in dangerous disrepair. Frequent complaints include: mold, asbestos, rodent infestations, roofs caving in, exposed wires, no insulation, inoperable windows, no locks, non-functioning appliances, no Wi-Fi and poor cellular phone service. Forest Service housing compares unfavorably with that in other land use agencies.
- Only housing available is “males only”. No family housing or it is limited to 3-year terms.
- Employees make repairs themselves or pay out of pocket because the FS says there is no money.
- Housing is not guaranteed. Temporary employees can lose their housing if they take a permanent

position. Employees can be kicked out of housing on short notice. For example, if the Agency has posted a vacancy announcement for a position with higher priority for housing, the current occupant must vacate. That bed will go unused until the new hire onboard.

- Employees are paying market rates for substandard living facilities. Rents in government housing are high because they are based on the next closest municipality, which are often pricey tourist or college towns. Rent is not reduced when property is in disrepair.
- Rents are not fairly pro-rated among government housing tenants. For example, if the only government housing available is designed for six occupants, but only one employee wants housing, that one employee must pay the entire rent even if no one else lives there.

These problems are systemic and widespread. Right now, our union is conducting a survey of the bargaining unit to gather the data to reliably demonstrate the depth of the problems and identify specific locations of urgent concern. We are also consulting with other stakeholders including non-union forest employees and affinity wildland firefighter associations, to pinpoint areas of common concern. We will share that data and those conclusions with you as soon as possible, within the next few weeks.

In the short term, we have identified changes that the Forest Service can implement immediately to improve living conditions and aid in the recruitment of new employees. These recommendations include:

1. Expedite repairs and upgrades for existing government housing, including adding simple amenities and new furnishings. Instruct forest supervisors to complete deferred maintenance by the end of the calendar year. Mandate that forest supervisors review and by default, approve, any reasonable request for maintenance with a priority to those repairs that impact the hygiene, health, and safety of employees.
2. Waive all rent payments from employees on government housing until issues are abated and housing is livable. Investigate via the Inspector General any private housing providers who charge market or premium rates for substandard housing, or commit any violations of federal or local health or infestation regulations.
3. Establish a housing stipend benefit and make it available to any employee who does not live in Forest Service housing.
4. Lay down more trailer pads with full hookups on Forest Service property. Expedite the purchase of campers for employees who request them and put them to immediate use.
5. Consult the Department of Interior on best practices and get their housing blueprints for permanent builds. National Park Service employees have A-frame cabins with a common room with a TV, cookhouse, shared bathroom, and private quarters.
6. Identify all sites that have been deemed “administrative site” and begin construction right away. Environmental impact assessments do not need to be completed on these sites and new construction is subject only to public comment.

7. Hire more forest engineers and facilities staff to keep up with regular upgrades and to build new buildings. Contractor construction and renovation maintenance is extremely expensive. Currently, some forests only have one person responsible for this work for the entire forest.
8. Condemn and bulldoze properties as necessary to eliminate safety risks and prepare for new permanent builds.
9. Audit the QMQM fund where money employees pay in rent is held and redistribute these funds for maintenance. Ensure each region is allocating those resources fairly between forests and is making those funds available for promptly repairing and renovating existing housing.

In the longer term, we recommend the following changes to housing across the Forest Service:

- A. **Availability.** Every Forest Service employee who wants to live in Forest Service housing should get it. This goal requires significant upgrades to current housing and new building. Housing must accommodate the workforce we will have within ten years and account for surges in hiring. Permanent housing might include NPS-style cabins and barracks, mobile housing such as campers, multi-family style options for families, access to Forest Service land for employees to park privately owned vehicles or campers, if they choose, and provide on-forest camping opportunities for the intentionally transient. Even short-term housing must have the minimum amenities upgraded to ensure living arrangements are dignified and are attractive to potential recruits.
- B. **Affordability.** Set one low rate nationwide for the cost per-day to live in Forest Service housing. Establish different rates for types of housing commensurate with the level of amenities they choose to use. For example, it should not be more expensive for an employee to rent a camping pad with hookups than to have a fully furnished bunk in a permanent structure. For those who choose to live off-forest, housing stipends should be permanently available based on the market rate in the next closest municipality to duty station.
- C. **Stability.** Build sufficient housing so each employee, and their families when necessary, can keep their selected housing for as long as they need while working for the Forest Service. Eliminate the practice of evicting current tenants to make room for new employees. If housing options are more available, employees will have more flexibility to take a permanent position, apply for a promotion, or take an assignment in another forest that currently is out of reach due to the housing crisis.
- D. **Expanded Options.** Maximize employee choice in housing. Permanent structures are generally preferred over temporary or mobile housing configurations that deteriorate quickly because of exposure to the elements. Barracks and cabins are more generally sought after than campers & yurts. Portable housing may appeal to some employees because it minimizes travel, but it does not weather well and falls apart. Housing options should be creative and accommodate any individual employee's preferred lifestyle so long as their housing arrangement allows them to do their job with the Forest Service.
- E. **Equality.** Eliminate barriers to housing based on an employee's gender or family status. Provide professional child-care to help with recruitment and retention.

- F. Transparency. Be transparent in how rent monies are utilized. Adopt revised policies that ensure integrity and accountability in how rent-generated funds are used by forest supervisors. Create a position if necessary to ensure oversight and quality control on all aspects of housing administration.
- G. Standardize housing requirements. By standardizing housing requirements to include amenities, furniture, and other basic living needs will help employees find good housing options wherever they work. Living in government housing should not be an embarrassment. Decent housing is a tool for recruitment. Select and standardize durable and comfortable furnishings that are American and union-made to the maximum extent feasible. Provide reliable phone service and Wi-Fi coverage. Winterize each living space and equip each living area with efficient water heaters, heat pumps, and air conditioners for employees to live safely and comfortably in local weather. Many employees want more safety and privacy. Sound-proof the walls, provide window coverings, and windows/interior doors that lock from the inside.

Fixing the housing problems in the Forest Service will require allocation of additional financial resources. However, this is necessary for the agency to attract and retain the workforce it needs to accomplish its critical mission. The current state of housing represents a certain degree of neglect via programmatic funding to maintain housing conditions and adjust for modern life, such as access to electronic communications, or in the interests of family responsibilities to prevent firefighters from choosing between a career or a family.

Thank you for this opportunity to provide initial information to you regarding the Forest Service housing crisis, and we look forward to continuing to work with you to modernize and upgrade the living conditions of federal wildland fire fighters.

Sincerely,



Randy Erwin
National President/DBR
National Federation of Federal Employees,
IAMAW, AFL-CIO