



Drug Enforcement on National Forest System Lands

Audit Report 08003-0001-22

OIG evaluated the effectiveness of controls over the detection and eradication of marijuana grown on NFS lands and reviewed the effectiveness of rehabilitation methods.

OBJECTIVE

Our objectives were to evaluate the effectiveness of controls over the detection and eradication of the marijuana grown on NFS lands, the effectiveness of FS' rehabilitation methods for impacted lands, and FS' strategy for reducing health and safety risks and protecting the Nation's natural resources.

REVIEWED

We reviewed pertinent laws and regulations governing controlled substance enforcement and reclamation and rehabilitation activities on NFS lands. We also reviewed FS policies and procedures that provide guidance to FS regional offices and national forest staff. We also interviewed FS national office, regional office, and national forest personnel.

RECOMMENDS

FS should assess how marijuana cultivation in the NFS affects water, wildlife, and forests; develop and implement guidance on cleaning up and tracking grow sites; document hazardous materials at grow sites; and clean up these grow sites based on highest risk.

WHAT OIG FOUND

We found that Forest Service (FS) officials are conducting effective actions to detect and eradicate marijuana grown on National Forest System (NFS) lands. However, we found that FS does not always reclaim and rehabilitate marijuana grow sites after plants are eradicated, and FS is unaware of the overall impact these marijuana grow sites pose to the forest ecosystems. This occurred because of a lack of FS resources and expertise, as well as communication and coordination between FS' Law Enforcement and Investigations (LEI) and NFS staff. As a result, trash and chemicals such as pesticides and fertilizers are still present on these grow sites, thereby putting the public, wildlife, and environment at risk of contamination. In addition, FS has not conducted an overall assessment of the effect this marijuana cultivation has on the forest ecosystems. As a result, FS does not have adequate information needed to prioritize its limited resources to reduce the risk to the public and the environment.

In addition, FS does not track the status of reclamation and rehabilitation activities at grow sites or consistently document marijuana plants eradicated from or hazardous materials found at these sites. Without these data, FS is unable to determine the presence, types, and locations of hazardous materials left on the national forests. Consequently, it cannot prioritize grow sites for reclamation and rehabilitation efforts to minimize the sites' risk to the public and wildlife.

FS generally agreed with our findings and recommendations, and we were able to accept management decision for 6 of the 7 recommendations. Further action from the agency is needed before management decision can be reached for the remaining recommendation.



United States Department of Agriculture
Office of Inspector General
Washington, D.C. 20250



DATE: March 30, 2018

AUDIT
NUMBER: 08003-0001-22

TO: Victoria Christiansen
Interim Chief
Forest Service

ATTN: Antoine Dixon
Chief Financial Officer

FROM: Gil H. Harden
Assistant Inspector General for Audit

SUBJECT: Drug Enforcement on National Forest System Lands

This report presents the results of the subject audit. Your written response to the official draft report is included in its entirety at the end of this report. Your response and Office of Inspector General's (OIG) position are incorporated into the relevant sections of the report. Based on your written response, we are accepting management decision on Recommendations 1, 3, 4, 5, 6 and 7. Management decision has not been reached for Recommendation 2. The actions needed to reach management decision for this recommendation are described under the relevant OIG Position section.

In accordance with Departmental Regulation 1720-1, please furnish a reply within 60 days describing the corrective actions taken or planned, and timeframes for implementing the recommendation for which management decision has not been reached. Please note that the regulation requires management decision to be reached on all recommendations within 6 months from report issuance, and final action to be taken within 1 year of each management decision to prevent being listed in the Department's annual Agency Financial Report. Please follow your internal agency procedures in forwarding final action correspondence to OCFO.

We appreciate the courtesies and cooperation extended to us by members of your staff during our audit fieldwork and subsequent discussions. This report contains publicly available information and will be posted in its entirety to our website (<http://www.usda.gov/oig>) in the near future.

Table of Contents

Background and Objectives	1
Section 1: Impact of Marijuana Grow Sites.....	4
Finding 1: FS Has Not Effectively Addressed the Damage Caused by Marijuana Grow Sites	4
Recommendation 1	9
Recommendation 2	10
Recommendation 3	10
Section 2: Documentation and Tracking of Marijuana Grow Sites	12
Finding 2: FS Does Not Consistently Document Marijuana Grow Sites and Does Not Track the Response Activities at these Grow Sites	12
Recommendation 4	16
Recommendation 5	17
Recommendation 6	18
Recommendation 7	18
Scope and Methodology.....	20
Abbreviations	22
Exhibit A: Audit Sites Visited.....	23
Agency's Response	25

Background and Objectives

Background

The mission of the Forest Service (FS) is to sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations. The agency manages 193 million acres of land comprised of 154 national forests and 20 grasslands in 43 States, Puerto Rico, and the Virgin Islands. The agency has four levels: Headquarters, Regions, National forests and grasslands, and Ranger districts. FS manages the National Forest System (NFS) through nine regional offices (see Figure 1).

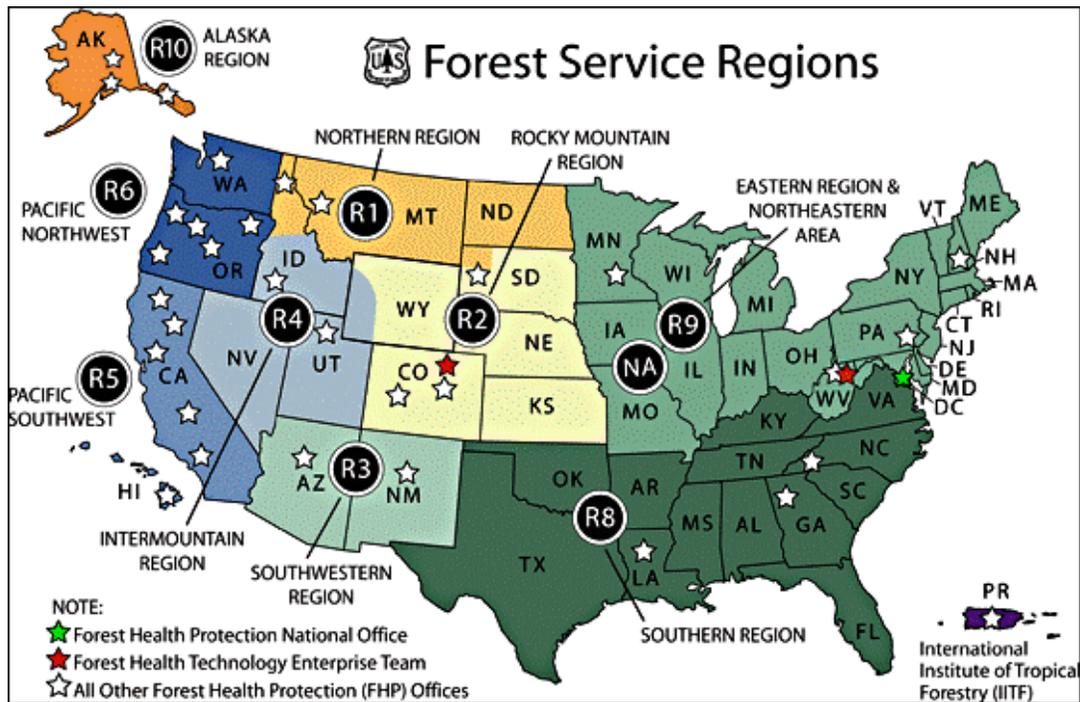


Figure 1: This map shows the Forest Service’s nine regions, the International Institute of Tropical Forestry, the Forest Health Protection National Office, the Forest Health Technology Enterprise Team, and other Forest Health Protection Offices.

Marijuana cultivation is a drug enforcement issue of specific concern to FS. This activity creates health and safety risks to the visiting public and employees, and threatens the continued viability of our nation’s natural resources. Drug Trafficking Organizations (DTO) have been identified as the key producers of marijuana on NFS lands. DTO activities are confirmed in 72 national forests and in all regions, except for Region 10. According to the FS Budget Justification for Fiscal Year (FY) 2017, approximately 80 percent of the marijuana grown on Federal public land is grown on NFS lands.

Law Enforcements and Investigations (LEI) is responsible for providing a safe environment for the public and FS employees, and for protecting the Nation’s natural resources on NFS lands and surrounding areas. FS received \$379,336,000 between FY 2014 and FY 2016¹ for Law Enforcement operations, including drug enforcement. FS does not have a specific budget for drug enforcement activities. The National Forest System Drug Control Act of 1986, as amended in 1988, and 16 United States Code (U.S.C.) § 559 a-e, provide authorization to the FS for law enforcement activities relating to the Controlled Substance Act and 21 U.S.C.

Through a Memorandum of Understanding with the Drug Enforcement Agency, FS has assumed a lead role for enforcing Federal drug laws on NFS lands. One of the main goals of the White House’s Office of National Drug Control Policy is to “disrupt domestic drug trafficking and production and to eradicate marijuana cultivation”; LEI’s effort to address marijuana production and its associated severe environmental damage in addition to the significant safety risk DTOs pose to public lands is a central tenet of that goal.

LEI special agents plan and conduct investigations concerning possible violations of criminal and administrative provisions of FS and other statutes under the United States Code. These officers carry concealed firearms and other defensive equipment, make arrests, execute complex criminal investigations, present cases for prosecution to U.S. Attorneys, and prepare investigative reports. All field agents are required to travel, and they usually maintain a caseload of up to 15 ongoing criminal investigations. LEI also provides a highly visible uniformed patrol presence and rapid emergency response to incidents affecting the public and employees visiting or working on NFS sites.

Over 90 percent of marijuana plants seized on NFS land in FY 2014 and 2015 were located in California (FS Region 5). FS detects marijuana grown on NFS through a number of methods, including aerial reconnaissance, routine patrols, and cameras located in higher risk areas of NFS. Additionally, hunters and other NFS visitors alert FS to possible grow sites.²

LEI participates in joint operations with the Drug Enforcement Agency, other Federal agencies, regional task forces, State and local police authorities, and the National Guard to perform detection and eradication activities. LEI uses approximately 500 cooperative law enforcement agreements that use State and local cooperators to assist and augment patrols on NFS lands to enhance LEI patrol coverage and to ensure public safety. However, in many remote areas or areas with diminished local law enforcement, LEI often provides the only law enforcement personnel available.

Illegal cultivation of marijuana damages NFS lands by diverting water from streams and rivers. DTOs use illegal and dangerous pesticides (chemicals) that indiscriminately kill wildlife, leach into the water table, and pose a significant threat to the safety of law enforcement and other

¹ \$126,653,000 for FY2014, \$126,653,000 for FY2015, and \$126,030,000 for FY 2016.

² According to FS, a grow site often consists of one or two camping or sleeping areas, interconnected by a trail system, which provides quick access to additional plots that may be separated by a few yards or up to a half a mile. The camping and sleeping area may be spread over 1 to 2 acres and the “growing areas” 10 to 20 acres with the total impacted area being up to 50 acres.

personnel at grow sites. The primary activities and costs associated with the cleanup of these grow sites include removal of irrigation pipes, removal and disposal of hazardous materials (rodenticide, herbicide, etc.), and removal of storage sheds. In FY 2016, 1,149,749 marijuana plants were eradicated on NFS lands. Forest Service participated in multiple operations in partnership with other State, local and Federal partners. These efforts also resulted in the seizure of over 6,811 pounds of processed marijuana and 53 firearms, and led to 45 arrests. During these operations, FS removed 116.1 tons of infrastructure, 14.9 tons of fertilizers, 2467.2 pounds of pesticides, 16.8 gallons of restricted or banned use poisons, over 225 miles of irrigation pipe, and 204 man-made dams/reservoirs.

Objectives

The objective of our audit included evaluating the effectiveness of controls over the detection and eradication of marijuana grown on NFS lands; however, we did not identify any reportable issues for this objective. We also evaluated the effectiveness of the rehabilitation methods FS uses on impacted lands. Additionally, we evaluated FS' strategy for reducing health and safety risks and protecting the Nation's natural resources.³

³ Our initial audit objective included evaluating the effectiveness of controls over the prevention and detection of the manufacture, distribution, and dispensing of controlled substances on NFS Lands. However, this objective was modified based on survey work performed.

Section 1: Impact of Marijuana Grow Sites

Finding 1: FS Has Not Effectively Addressed the Damage Caused by Marijuana Grow Sites

FS does not always reclaim and rehabilitate⁴ marijuana grow sites after plants are eradicated, and FS is unaware of the overall impact these marijuana grow sites pose to the NFS ecosystems. This occurred because of a lack of FS resources, expertise, communication, and coordination between LEI and national forest staff. As a result, trash and chemicals such as pesticides and fertilizers are still present at marijuana grow sites several years after LEI has eradicated these marijuana grow sites, putting the public, wildlife, and environment at risk of contamination. In addition, FS has not conducted an overall assessment of the effect marijuana cultivation has on the national forest ecosystems due to a lack of prioritization of its limited funding. Without this complete assessment, FS does not have the essential information needed to prioritize its limited resources to reduce the risk to the public and the environment or to protect the Nation's natural resources.

The FS mission is to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations. LEI is charged with providing a safe environment for the public and FS employees, and protecting the Nation's natural resources on approximately 193 million acres of NFS lands in 43 States. The Government Accountability Office (GAO) Green Book⁵ states that management should communicate quality information to enable personnel to perform key roles in achieving objectives, addressing risks, and supporting the internal control system.⁶ Furthermore, management should design and implement control activities through policies to achieve objectives and respond to risks.⁷

We performed onsite inspections of eight marijuana grow sites that were eradicated in FYs 2014-2016 in California⁸ and two marijuana grow sites in Daniel Boone National Forest in Kentucky. Hazardous materials were present at seven of the eight grow sites in California, and infrastructure such as irrigation piping, trash, or equipment were found at all eight sites. The hazardous material and infrastructure were still present several years after eradication for some

⁴ According to FS, *reclamation* is the removing of the immediate environment and health threats from grow sites including hazardous material and irrigation piping. *Rehabilitation* includes bringing the site back to its original condition, including efforts taken to offset erosion, decommission trails, and revegetate an area heavily cut and thinned by growers.

⁵ *Standards for Internal Control in the Federal Government*, known as the "Green Book," sets the standards for an effective internal control system for federal entities.

⁶ GAO-14-704G, *Standards for Internal Control in the Federal Government* (September 2014), Page 60, Principle 14.03.

⁷ GAO-14-704G, *Standards for Internal Control in the Federal Government* (September 2014), Page 44, Principle 10.

⁸ Grow sites included: 2014 and 2016 grow sites on Los Padres National Forest; 2014, 2015, and 2016 grow sites on Plumas National Forest; and 2014, 2015, and 2016 grow sites on Sequoia National Forest.

of the grow sites.⁹ Both sites visited within the Daniel Boone National Forest had some trash onsite; however, neither had piping nor equipment. According to Region 8 LEI staff, the growers on Daniel Boone National Forest do not use the piping and chemicals that growers in California use.



Figure 2: Trash, fertilizer, and chemicals left at a marijuana grow site in Sequoia National Forest. Photo by OIG

The absence of grow site reclamation and rehabilitation occurred, in part, due to a lack of communication and coordination between LEI and national forest staff. In some instances, LEI has been reluctant to share grow site locations with other national forest staff due to security concerns with outside parties receiving the information. In addition, in at least one national forest we visited, national forest staff has been unable to get LEI to fill out an inventory of items found at grow sites due to the lack of time available. Without this information, national forest staff cannot identify locations and hazards of grow sites and is thus unaware of damages, reclamation and rehabilitation needs, workloads, and costs. In addition, at some national forests,

⁹ Hazardous material includes fertilizers, pesticides, rodenticides, and other chemicals. We were unable to walk the entire site because the site was overgrown with new trees and plants, so we did not find hazardous materials at the 2014 Los Padres grow site; however, hazardous material might have been present.

LEI staff stated that national forest staff believes the cleanup of grow sites is LEI's responsibility. Indeed, we found that FS does not have guidance that outlines who is responsible for the reclamation and rehabilitation of the grow sites. Without a clear designation of responsibilities in FS guidance, it makes it difficult for FS and LEI staff to effectively work together to ensure they keep the national forests and the visiting public safe and protected.

According to LEI officials, officers have been injured from chemical exposure while on these grow sites. Because of such injury risks, the national office has instructed LEI staff to not handle anything that appears hazardous. FS regional and national office officials stated they do not have the resources or the specially trained experts needed for hazardous materials safety. Therefore, LEI is not able to effectively reclaim and rehabilitate all marijuana grow sites. To reclaim and rehabilitate hazardous materials, FS often has to use contractors with hazardous materials training, which can be costly. FS officials have stated that costs to clean up some marijuana grow sites can reach as high as \$100,000. FS officials have stated that, due to lack of funding, FS has not been able to reclaim and rehabilitate many of the grow sites in the past few years.

Because of not reclaiming and rehabilitating these grow sites, hazardous materials are still present, thereby putting the public, wildlife, and environment at risk of contamination several years after LEI has eradicated them. Growers spray pesticides and add them to irrigation systems, so the chemicals seep into the soil and surrounding waterways—these chemicals can kill aquatic species and potentially compromise the safety of drinking water downstream. One expert estimated that Federal land in California contains 731,000 pounds of solid fertilizer, 491,000 ounces of concentrated liquid fertilizer, and 200,000 ounces of toxic pesticides.¹⁰ LEI in Region 5 informed us that it often finds dead animals, including bears, at grow sites. Once an animal consumes and dies from pesticides, the chemicals continue powering through the ecosystem as animals feed upon the poisoned carcasses. At one site, researchers found a dead fox, a dead vulture that had been feeding on the fox, and dead insects that had landed on both (See Figure 3).

¹⁰ Sharon Bernstein, *Toxic Waste from U.S. Pot Farms Alarms Experts*, Reuters (August 6, 2017), <https://www.reuters.com/article/us-usa-marijuana-environment/toxic-waste-from-u-s-pot-farms-alarms-experts-idUSKBN1AM0C3>.



Figure 3: Executive Director/Senior Ecologist of the IERC (Integral Ecology Research Center)¹¹ samples a fox and vulture found dead at a marijuana grow site on the Lassen National Forest in California. The small black dots on the ground between the animals are flies that died from eating the decaying carcasses. Photo by IERC

In addition to the hazardous materials, as noted earlier in this finding, we found that the growers' infrastructure, specifically irrigation piping as well as trash and equipment, was still present at grow sites several years after eradication efforts. When infrastructure and materials are not removed, we believe this allows grow sites to be more easily reactivated year after year. We witnessed a possible reactivated grow site during one of our visits to Los Padres National Forest. While hiking into the grow site, LEI officers indicated the new trash and fertilizers as signs of new activity and stated that the grow site was most likely reactivated. We conclude that if FS

¹¹ IERC is a non-profit organization dedicated to the research and conservation of wildlife and their ecosystems. According to its website, the mission of IERC is to perform ecological research and to compile, organize, and disseminate the results of this research in order to improve scientific knowledge of the public and advance the management and conservation of wildlife species and overall ecosystem health and conservation.

removed the infrastructure, it could reduce the likelihood that growers would easily be able to return to the site and therefore may reduce the number of grow sites requiring eradication in the future.

An FS contractor stated that when sites are fully reclaimed and rehabilitated, DTOs are less likely to re-establish these grow sites. He stated that grow sites use an average of 5,000-7,000 feet of irrigation piping, and if all the piping and infrastructure are taken out of the grow site, the growers have to bring multiple truckloads of infrastructure through the forest to reactivate; this increases the likelihood that the growers will be detected and prosecuted. One of FS' goals is to "clean and rehabilitate grow sites to deter the re-use of the area for marijuana cultivation."¹² However, officials stated that the dangerous hazardous materials now found at grow sites limit how many they can dismantle and reclaim. Additionally, multiple LEI officials have stated that they often have grow sites reactivated when they do not fully reclaim the site. However, FS did not have any data that show how often grow sites are reactivated when the sites are not fully reclaimed.



Figure 4: Flexible irrigation piping taps into a stream in the Sequoia National Forest to irrigate marijuana plants. Some of these pipes were still pressurized with water at the time of our inspection. Photo by OIG

¹² USDA FS, *Forest Service National Drug Trafficking Organization Strategy*, (January 26, 2011), page 2.

In addition to not reclaiming and rehabilitating marijuana grow sites, we found that FS is unaware of the overall impact these grow sites pose to the public and the environment. We interviewed officials at each site we visited, and although they were aware there were environmental impacts, they had not assessed them. FS has not conducted an overall assessment of the impacts of marijuana cultivation on the national forest ecosystems that considers chemical runoff into watersheds, water diversion, wildlife damage (endangered species), deforestation, or other impacts. However, we noted that some individual national forests, such as Plumas National Forest, have used a contractor to evaluate specific marijuana grow sites to determine what chemicals are present. FS officials agreed that they have not yet prioritized FS' limited funding to assess the overall impact of marijuana grow sites on NFS land. Until FS is aware of the impact these grow sites have, FS will not have needed information to prioritize its limited resources toward appropriately reducing the risk to the public and the environment. If FS could determine the risks and effects of the marijuana grow sites, it could better support its funding and personnel decisions. FS would also be able to prioritize its staff and resources to reclaim and rehabilitate the grow sites that pose the highest risk.

Recommendation 1

Conduct an overall assessment of the impact of marijuana cultivation on the national forest ecosystem to include chemical runoff into watersheds, water diversion, wildlife damage (endangered species), deforestation, or other impacts.

Agency Response

In its March 19, 2018, response, FS stated:

The Forest Service generally concurs with this recommendation.

Studies have been done to “Assess the Impact of Public Lands Marijuana Cultivation on Soil, Water, Plants, and Wildlife” on National Forest Systems lands by Dr. Mourad W. Gabriel, MS, PhD, Director, Integral Ecology Research Center (IERC). Dr. Gabriel continues to partner with the Forest Service’s Pacific Southwest Region to perform research and to conduct agency-wide training. Dr. Gabriel’s publications can be found at this website: [Marijuana Grow Site Cleanup Research](#)

Therefore, the Forest Service will conduct a three phase assessment that’s slated to take place over the course of about five years, in accordance with funding. Phase One, which is to be conducted in the next year, will include a qualitative literature research. It will focus mostly on the work Dr. Gabriel has done on NFS lands and marijuana cultivation impacts to humans, soil, water, plants and wildlife. The results of the research will allow us to design an approach to quantify the impacts to humans, soil, water, plants and wildlife.

Phases Two and Three will encompass the use of quantified results to design prioritization and take inventory, and begin remediation of grow sites respectively.

Forest Service provided an estimated completion date of April 1, 2019, for this action.

OIG Position

We accept management decision on this recommendation.

Recommendation 2

Develop a methodology for prioritizing grow sites for reclamation and rehabilitation based on grow sites that pose the highest risk. Begin to reclaim and rehabilitate marijuana grow sites, starting with those that pose the highest risk.

Agency Response

In its March 19, 2018, response, FS stated:

The Forest Service generally concurs with this recommendation.

A site inventory form, which includes grow site data was developed to assist managers in evaluating and prioritizing sites for reclamation and rehabilitation.

Prioritizing reclamation and rehabilitation of grow sites that pose the highest risk could pose financial concerns, as it's not always cost effective. Grow sites in close proximity to each other can be cleaned up at lower costs, as opposed to those with longer distances between sites. Therefore, careful consideration and flexibility should be exercised in prioritization to ensure that the limited funds for reclamation and rehabilitation are used efficiently.

Forest Service provided an estimated completion date of April 1, 2019, for this action.

OIG Position

We are unable to accept management decision on this recommendation. FS' response discusses the site inventory form, but not a methodology on how they will use the site inventory form to evaluate and prioritize grow sites for reclamation and rehabilitation. To reach management decision, FS needs to develop a methodology for prioritizing grow sites with instructions or guidance outlining the process of evaluating the site inventory forms to determine those sites that pose the highest risk.

Recommendation 3

Develop policies and procedures outlining how to reclaim and rehabilitate grow sites to ensure consistency across all of the national forests. This guidance should outline the responsibilities

and the communication requirements of the various LEI and national forest staff in the reclamation and rehabilitation of the marijuana grow sites.

Agency Response

In its March 19, 2018, response, FS stated:

The Forest Service concurs with this recommendation.

Development of national policies and procedures, outlining responsibilities and communication requirements of LEI and national forest staff, will be drafted by the LEI, Office of Safety and Occupational Health (OSOH) and Engineering, Technology and Geospatial Services (ETG) staffs, as the reclamation and rehabilitation of marijuana grow sites encompasses all three program areas.

Forest Service provided an estimated completion date of April 1, 2019, for this action.

OIG Position

We accept management decision on this recommendation.

Section 2: Documentation and Tracking of Marijuana Grow Sites

Finding 2: FS Does Not Consistently Document Marijuana Grow Sites and Does Not Track the Response Activities at these Grow Sites

FS does not consistently document the marijuana plants eradicated from or the materials found at grow sites. In addition, FS does not track the status of reclamation and rehabilitation activities.¹³ This occurs because FS does not have a documented strategy or specific guidance related to: entering marijuana eradicated into the Law Enforcement and Investigations Management and Attainment Reporting System (LEIMARS),¹⁴ documenting the materials found on grow sites, and tracking and reporting reclamation activities conducted at marijuana grow sites. Without accurate and relevant data, FS is unable to determine the presence, type, and location of hazardous materials left on the national forests. As a result, it cannot prioritize grow sites for reclamation and rehabilitation efforts to minimize sites' risk to visitors, employees, wildlife, and the Nation's natural resources.

The GAO Green Book states that management should communicate quality information down and across reporting lines to enable personnel to perform key roles in achieving objectives, addressing risks, and supporting the internal control system.¹⁵ Management should obtain data on a timely basis for effective monitoring.¹⁶ Quality information is appropriate, current, complete, accurate, accessible, and provided on a timely basis.

Management is to use quality information to make informed decisions and evaluate the entity's performance in achieving key objectives and addressing risks.¹⁷ Management should design and implement control activities through policies to achieve objectives and respond to risks.¹⁸ The Forest Service Manual states that LEI is to use LEIMARS to report and track all violations of law and regulations and all felony and serious misdemeanor cases.¹⁹ The Forest Service Manual also states the LEI National Office Director is responsible for providing instructions needed to operate LEIMARS and to provide oversight, monitoring, and periodic assessment of LEIMARS data to ensure data are accurate and complete.

¹³ The primary activities associated with reclamation and rehabilitation are the removal of irrigation pipes, the removal and disposal of hazardous materials (rodenticide, herbicide, etc.), and the removal of storage sheds and other fabricated structures.

¹⁴ A web-based application that is the incident reporting and case tracking system for the Forest Service.

¹⁵ GAO-14-704G, *Standards for Internal Control in the Federal Government* (September 2014), Page 60, Principle 14.03.

¹⁶ GAO-14-704G, *Standards for Internal Control in the Federal Government* (September 2014), Page 59, Principle 13.04.

¹⁷ GAO-14-704G, *Standards for Internal Control in the Federal Government* (September 2014), Page 60, Principle 13.05.

¹⁸ GAO-14-704G, *Standards for Internal Control in the Federal Government* (September 2014), Page 44, Principle 10.

¹⁹ Forest Service Manual, *Title 5300—Law Enforcement*, Chapter 5340 Reports (May 7, 2009), 5340.3. - Policy.

According to FS officials at both the national and regional offices, LEIMARS does not currently track hazardous materials or reclamation and rehabilitation activities related to marijuana grow sites, therefore FS was unable to provide OIG a list of all grow sites that had been reclaimed, rehabilitated, or had remaining hazardous materials. A regional official stated that she was unaware of any systems to track hazardous materials or reclamation and rehabilitation activities related to marijuana grow sites.

The FS national office generates the Controlled Substance Enforcement Activity Report using the information in LEIMARS to report drug activity on NFS lands, including marijuana eradication data, on a fiscal year basis. However, the national office did not ensure the eradication data were recorded in the correct fiscal year in the two FS regions we reviewed. At 4 out of the 5 national forests we reviewed,²⁰ we identified 38 instances in which marijuana eradication activity that occurred in 1 fiscal year was documented in LEIMARS in a different fiscal year. Additionally, we identified two instances in which the LEIMARS report dates preceded the eradication dates provided by FS officials by more than 8 months. This occurred because FS reports marijuana eradication data based on the report date in LEIMARS instead of the date the marijuana was eradicated.

FS officials said that often it could be months before the marijuana eradication data are received from State law enforcement officials and other law enforcement eradication teams and therefore the data are not timely entered into LEIMARS. We understand that FS shares responsibility and cooperates with Federal, State, and local law enforcement agencies in the sharing of eradication of marijuana.²¹ However, Federal regulations specify that agencies are ultimately responsible for the services and processes provided by third-party service organizations as they relate to the agency's ability to maintain internal control over operations, reporting, and compliance with laws and regulations.²²

An FS national office official stated FS is aware of the problems and agrees that it needs a solution. According to national office officials, LEIMARS is currently undergoing updates and enhancements that will include a "date seized" entry field. This new field will allow FS to run the report using that field instead of the date the data were entered. However, although FS has explored adding a data entry field in the LEIMARS system for basic hazardous materials data, LEI national office officials stated that a separate system or process should be developed to track hazardous materials and reclamation activities used to assist with the prioritization of clean-up and rehabilitation activities. According to LEI officials with the national office, the hazardous materials and reclamation and rehabilitation activity data should not be tracked within LEIMARS because it is a law enforcement database that only LEI may access.

²⁰ We performed fieldwork at Los Padres National Forest, Daniel Boone National Forest, Plumas National Forest, and Sequoia National Forest throughout our audit. We performed fieldwork at Shasta-Trinity National Forest during our survey phase.

²¹ Forest Service Manual, *Title 5300—Law Enforcement*, Chapter 5340 Reports (January 24, 2008), 5303.2. – Cooperation With Other Agencies.

²² OMB, *OMB Circular No. A-123, Management's Responsibility for Enterprise Risk Management and Internal Control*, Memorandum M-16-17 (July 15, 2016), Page 24.

We performed inspections of 10²³ marijuana grow sites eradicated between FY 2014 and FY 2016, located at 4 national forests. In addition, during our audit survey phase, we visited an additional three marijuana grow sites at the Shasta-Trinity National Forest in Region 5. At each national forest, we inquired about the status of each grow site as well as the availability of the site inventory. National forest officials at all four of the national forests reviewed in Region 5 were unable to provide the number of marijuana grow sites that possessed hazardous materials and/or those that still required reclamation and rehabilitation.²⁴ We did find that staff at two of the four national forests internally prepared documents to track the status of their grow sites; however, we noted these documents did not include information on whether all sites were reclaimed or the type or locations of hazardous materials found at the sites. Additionally, we could not reconcile this internally prepared information to the marijuana grow sites listed in LEIMARS. Officials at the Plumas National Forest stated they had not received any guidance or direction regarding reclamation from the national or regional office.

We identified that in Region 5, none of the four national forests reviewed used a formal process to inventory the materials located on their grow sites, and only one of the four national forests could provide OIG with a partially complete document that recorded grow site information. Additionally, OIG compared eradication information obtained at each of the five national forests reviewed to LEIMARS data provided by the FS national office.

At the five national forests, we found:

- The Shasta-Trinity National Forest LEI officials did not always use the inventory form they received from the regional office. For two of the three grow sites reviewed, personnel had used different types of documents to record grow site information. For the third grow site, the LEI and national forest officials were unable to provide documentation showing what was on the grow site. A national forest official stated the regional office provided the forest with an inventory sheet, which the national forest officials wanted LEI officials to use during site visits. However, national forest LEI officials stated that they do not have time to fill out inventory sheets while they are onsite due to other concerns. During our review, we identified two grow sites that had a report date in a different fiscal year than the eradication date.
- The Los Padres National Forest LEI officials created a spreadsheet to document information for grow sites for each grow season that included columns for information such as “date eradicated,” “plant count,” “guns,” and “Notes.” However, there is no specific category for hazardous material information, therefore it goes into “General Comments.” As a result, the data cannot be tracked or analyzed at a summary level (e.g., a geographic division level). In

²³ Grow sites included: 2015 and 2016 grow sites located on Daniel Boone National Forest in Kentucky; 2014 and 2016 grow sites on Los Padres National Forest; 2014, 2015, and 2016 grow sites on Plumas National Forest; and 2014, 2015, and 2016 grow sites on Sequoia National Forest.

²⁴ Based on discussions with Forest Service officials, OIG determined that Region 8 grow sites were smaller than those in Region 5, and as such the Region 8 grow sites did not require reclamation and almost never had hazardous materials used at the grow site.

addition, based on discussions with Los Padres National Forest officials, there are no National Forest procedures in place to ensure that information is consistently collected from grow site to grow site. A Los Padres National Forest LEI official stated that the official on site is responsible for collecting the information for the spreadsheet. In our review of the spreadsheet, we noted only partial information for many of the grow sites, and in many cases, the specific location of any hazardous materials identified on each site was rarely provided. We identified one instance in LEIMARS that had a report date in FY 2014 when the eradication occurred on September 25, 2013. Therefore, the eradication data for this grow site should have been included and reported in FY 2013.

- The Sequoia National Forest did not have a method in place to track or document materials found at marijuana grow sites. We did identify three grow sites that had a report date in FY 2016, but the eradication date was in FY 2015. We identified another instance in which the report date was in FY 2015 and the eradication occurred in FY 2014. Additionally, one instance in LEIMARS documented the grow site in the same fiscal year as the one documented by the national forest; however, the date of report in LEIMARS is December 14, 2015, while the eradication date provided by an FS official is more than 8 months later on September 1, 2016.
- The Plumas National Forest Patrol Captain stated he received a form for site reporting (inventory documentation worksheet) from the Region 5 office, but had not used it yet because it was not required. The official stated the worksheet is intended to help LEI staff prepare a field inventory of any hazardous materials/wastes encountered at the grow sites and to provide that information so staff can perform its work. The official stated he plans to implement the form for each grow site in 2017. In addition, Plumas National Forest officials told us that they are currently contracting for grow site assessments which are thought crucial to properly documenting grow sites. Officials stated the assessments enable the national forest to properly plan for the reclamation and rehabilitation activities as well as know of the existing hazards located on that grow site to reduce the risk of any FS staff planning work in that area. Plumas National Forest officials stated that grow site assessments are expensive, and while to date they have been fortunate to have funds available, there are concerns that they will not be able to keep up with the inventory of sites they have and the new grow sites they identify each grow season.
- The Daniel Boone National Forest, in Region 8, did not have a marijuana grow site inventory checklist nor a document to record the inventory. At both the regional and national office, officials stated grow sites in Region 8 do not contain the hazardous materials or items that would require a checklist to document the site. OIG identified 31 instances at the Daniel Boone National Forest in which eradication data were documented incorrectly. We found that 30 of the grow sites that were reported as eradicated in FY 2015 in LEIMARS had an eradication date in FY 2014, according to national forest marijuana eradication reports. We identified one grow site that was reported in LEIMARS as eradicated in FY 2016 due to the date of the report, but the eradication date was in FY 2015 based on national forest records. OIG also identified an instance in which both LEIMARS and the national forest documented a grow site was eradicated in the same fiscal year; however, the date of the

report in LEIMARS is November 2014, while the incident date in the national forest documentation was 8 months later, in July 2015.

FS national office officials agreed that a consistent standardized process is needed to assess, document, and track hazardous materials and the reclamation of grow sites. They added that Region 5 national forest safety officials and LEI officials have developed a preliminary site assessment/inventory worksheet to be used at all grow sites. National office officials stated that LEI staff do not have the expertise, training, and permission to conduct a thorough assessment or inventory.

Region 5 officials confirmed they have created a “Marijuana Grow Site: Field Inventory of Hazardous Materials/Wastes” worksheet that can be used to do an assessment in order to proceed with eradication once the site is secured; however, there is no official policy requiring national forest personnel to complete it. The purpose of the inventory sheet was to help determine what type of chemicals, including size and shape, are at the sites so that the national forest personnel know what sites need to be cleaned up and prioritize the ones that need hazardous materials removed. A regional office official stated that the inventory sheet was only in draft form. Furthermore, because it was not formal guidance, the regional office was having trouble getting the national forests to use the document.

Without a documented strategy or a formal process to require the documentation of materials found and the tracking and reporting of reclamation activities at marijuana grow sites, FS cannot ensure it is effectively addressing the reclamation requirements of marijuana grow sites. Additionally, FS is unable to prioritize grow site cleanup efforts based on risk to visitors, employees, wildlife, and the Nation’s natural resources.

We believe that if the national office created and implemented guidance requiring the documentation of materials found at grow sites, along with a standard form, the national forests and regional offices could consistently identify the materials found at grow sites across the regions and help prioritize their reclamation workload based on the urgency related to each chemical or material identified. Additionally, if FS can modify its supplemental report form and LEIMARS to include an entry for seizure date, it would reduce the likelihood of reporting inaccurate marijuana eradication data used for internal and external reports.

Recommendation 4

Develop and implement a methodology for tracking the reclamation and cleanup status of all grow sites identified by FS.

Agency Response

In its March 19, 2018, response, FS stated:

The Forest Service concurs with this recommendation.

LEI has developed a marijuana site inventory form and master spreadsheet to record the data for each marijuana grow site, including reclamation and clean-up status. This spreadsheet captures data points such as hazardous materials, reclamation, and cleanup, can be organized by forest or region. Data fields relative to reclamation and clean-up status include: date of eradication, date of reclamation, number of plants eradicated, reclamation status (yes/no/ percentage of site reclaimed), hazardous materials, and coordinates for hazardous materials, and remarks. Guidance will be issued to prepare the form, including instructions for officials responsible for entering data and updating the spreadsheet, the location to save the spreadsheet electronically, and a list of officials with access to this information.

Forest Service provided an estimated completion date of April 1, 2019, for this action.

OIG Position

We accept management decision on this recommendation.

Recommendation 5

Create and implement standardized guidance and an inventory sheet requiring national forests to document hazardous materials at grow sites, as well as the locations of those materials.

Agency Response

In its March 19, 2018, response, FS stated:

The Forest Service concurs with this recommendation.

California has developed a standardized inventory form that will be used at all marijuana grow sites. This inventory form will include specific hazmat information for manufacturer trade name; active ingredients; solid/liquid; color; container type, size, condition, and level of contents. Specific location in the grow site where each hazmat item is located will also be recorded. Once finalized, this form will be sent out with standardized guidance requiring it be completed by the Case Officer, Agent, or Law Enforcement Personnel in charge of that operation for each site that is eradicated or reclaimed. The information captured on the inventory form will be entered into a spreadsheet that will record information for all marijuana grows in the region. This data will be broken down by forest and compiled for each region.

Forest Service provided and estimated completion date of April 1, 2019, for this action.

OIG Position

We accept management decision on this recommendation.

Recommendation 6

Modify the Supplemental Incident Report Form FS-5300-2a and the LEIMARS to include an entry for a seizure date.

Agency Response

In its March 19, 2018, response, FS stated:

The Forest Service concurs with this recommendation.

Over the last several years, we have been working with software developers to upgrade and enhance LEIMARS. For example, one modification includes adding a seizure date in the CSEAR-drug seizures tab to allow for a separate seizure date from the report date. Each type of seizure (plants, processed marijuana, etc.) will require a separate entry in CSEAR for Drug Type and Drug Activity Type. This enhancement is in progress. Modifications to the Supplemental Incident Report Form FS-5300-2a will also be made to capture the seizure date.

Forest Service provided an estimated completion date of April 1, 2019, for this action.

OIG Position

We accept management decision on this recommendation.

Recommendation 7

Provide guidance to LEI officials to ensure future marijuana eradication data are recorded in the appropriate fiscal year.

Agency Response

In its March 19, 2018, response, FS stated:

The Forest Service generally concurs with this recommendation.

LEIMARS currently does not allow for separate seizure and eradication dates from the report date. This can result in seizure dates being reported inaccurately in the Controlled Substance Activity Report (CSEAR). Report dates can vary by months from the actual seizure and eradication date.

As previously mentioned in Recommendation 6, the Agency has contractors working to mitigate this issue. Once these updates are completed, guidance will be provided to the field to accurately capture and enter dates for all drug seizures, including eradicated marijuana.

Forest Service provided an estimated completion date of April 1, 2019, for this action.

OIG Position

We accept management decision on this recommendation.

Scope and Methodology

We conducted this audit to evaluate the effectiveness of controls over the detection and eradication of marijuana grown on NFS lands for FY 2014-2016. FS eradicated over 2.6 million marijuana plants across all regions over FYs 2014 (660,206), 2015 (874,890), and 2016 (1,149,749). We found that FS has officials at various levels within the agency conducting effective actions to detect and eradicate marijuana grown on NFS lands. We did not have any reportable issues on this part of the objective. We also evaluated the effectiveness of the rehabilitation methods FS uses on impacted lands. Lastly, we evaluated FS' strategy for reducing health and safety risks and protecting the Nation's natural resources.

We conducted fieldwork at the FS national office and two FS regional offices from October 2016 through August 2017. We judgmentally selected the top four national forests based on plant count in Region 5: Los Padres National Forest, Plumas National Forest, Sequoia National Forest, and Shasta-Trinity National Forest.²⁵ We also judgmentally selected the second highest national forest outside Region 5 based on plant count—Daniel Boone National Forest in Region 8. During the survey phase, we selected three grow sites at the Shasta-Trinity National Forest based on the status of rehabilitation work. We selected one site that was currently being rehabilitated, one that was rehabilitated recently, and one where the rehabilitation work occurred a year ago. During audit fieldwork, we judgmentally selected three grow sites²⁶ from each of the four national forests based on plant count to perform site visits.²⁷

At FS' national office, we familiarized ourselves with FS policies, program operations, and internal controls related to controlled substance enforcement and rehabilitation activities on NFS lands. At the FS regional offices and national forest offices, we evaluated oversight responsibilities and operating policies related to the detection and eradication of marijuana grown on NFS lands, rehabilitation methods used on impacted lands, and strategy for reducing health and safety risks and protecting the Nation's natural resources. At the national forest offices, we performed site visits to the grow sites to evaluate FS effectiveness of rehabilitation methods.

To accomplish our audit, we performed the following procedures:

- **Reviewed Criteria:** We reviewed pertinent laws and regulations governing controlled substance enforcement and rehabilitation activities on NFS lands. We also reviewed FS policies and procedures that provide guidance to FS regional offices and national forests.
- **Interviewed FS National Office, Regional Office, and National Forest Personnel and LEI:** We interviewed FS officials, including national office and regional office officials, national forest supervisors, deputy supervisors, environmental engineers, safety officers, patrol officers, patrol captains, and special agents to gain an understanding of their roles

²⁵ The Shasta-Trinity National Forest was reviewed during the Survey Phase.

²⁶ One for each fiscal year in our scope: FY 2014–2016.

²⁷ We were unable to perform site visits for 2 of the 12 grow sites during the audit phase due to inclement weather and remote location.

and responsibilities in monitoring drug enforcement activities on NFS lands and to determine FS' strategy for detecting and eradicating marijuana grown on NFS lands, rehabilitation methods, and reducing health and safety risks and protecting the Nation's natural resources. We also asked FS officials about the communication and coordination between LEI and NFS officials regarding these strategies.

- **Coordination with Outside Entities:** We inquired how LEI officials at the regional office and national forest use formal agreements with other federal law enforcement agents, state governments, and local private entities to perform the strategies mentioned above.
- **Tracking of Grow Sites:** We determined whether the FS tracks and reports rehabilitation of impacted lands from marijuana grown on NFS lands. We also determined whether the FS tracks grow site locations including documenting hazardous materials found at grow sites.
- **Conducted Site Visits:** We performed fieldwork at the FS national office, two FS regional offices, and five national forests to determine FS' strategy for detecting and eradicating marijuana grown on NFS lands and for reducing health and safety risks and protecting the Nation's natural resources. We observed 10 grow sites to evaluate FS effectiveness of rehabilitation methods.

The only FS system the audit team relied on for data was LEIMARS. The audit team reviewed LEIMARS' design and effectiveness and ensured that the security plan was approved and had not expired. The audit team determined we would rely on source documents from LEIMARS. During the course of our audit, we did not rely on or verify information in any other agency electronic information systems, and we make no representation regarding the adequacy of any other agency computer systems or the information generated from them.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Abbreviations

DTO	Drug Trafficking Organization
FS	Forest Service
FY	fiscal year
GAO.....	Government Accountability Office
IERC	Integral Ecology Research Center
LEI	Law Enforcement and Investigations
LEIMARS	Law Enforcement and Investigations Management and Attainment Reporting System
NFS	National Forest System
OIG	Office of Inspector General
OMB	Office of Management and Budget
U.S.C.....	United States Code

Exhibit A: Audit Sites Visited

Audit Site	Location
FS National Office	Washington, D.C.
FS Pacific Southwest Region (R5) <u>National Forests</u> Shasta-Trinity Los Padres Sequoia Plumas	Vallejo, CA Redding, CA Goleta, CA Porterville, CA Quincy, CA
FS Southern Region (R8) <u>National Forests</u> Daniel Boone	Atlanta, GA Winchester, KY

**AGENCY'S
RESPONSE TO AUDIT REPORT**



File Code: 1430**Date:** March 19, 2018**Route To:****Subject:** FS Response to Reach Management Decision on Office of Inspector General Report No. 08003-0001-22, "Drug Enforcement on National Forest System Lands"**To:** Gil H. Harden, Assistant Inspector General for Audit, Office of Inspector General

Thank you for the opportunity to review and comment on the Office of Inspector General (OIG) Report Number 08003-0001-22. The Forest Service generally concurs with the findings. Please note our enclosed agency responses to the OIG recommendations. Please contact Antoine Dixon, Chief Financial Officer, at (202) 205-0429 or aldixon@fs.fed.us with any questions.

/s/ Victoria Christiansen
VICTORIA CHRISTIANSEN
Interim Chief

Enclosures (2)



U.S. Department of Agriculture’s Forest Service (FS)

**Office of Inspector General (OIG) Audit Report No. 08003-0001-22
Drug Enforcement on National Forest System Lands
Official Draft Issued February 15, 2018**

Response to the Official Draft Report / Management Decision Request

Recommendation 1: Conduct an overall assessment of the impact of marijuana cultivation on the national forest ecosystem to include chemical runoff into watersheds, water diversion, wildlife damage (endangered species), deforestation, or other impacts.

Forest Service Response: The Forest Service generally concurs with this recommendation. Studies have been done to “Assess the Impact of Public Lands Marijuana Cultivation on Soil, Water, Plants, and Wildlife” on National Forest Systems lands by Dr. Mourad W. Gabriel, MS, PhD, Director, Integral Ecology Research Center (IERC). Dr. Gabriel continues to partner with the Forest Service’s Pacific Southwest Region to perform research and to conduct agency-wide training. Dr. Gabriel’s publications can be found at this website: [Marijuana Grow Site Cleanup Research](#)

Therefore, the Forest Service will conduct a three phase assessment that’s slated to take place over the course of about five years, in accordance with funding. Phase One, which is to be conducted in the next year, will include a qualitative literature research. It will focus mostly on the work Dr. Gabriel has done on NFS lands and marijuana cultivation impacts to humans, soil, water, plants and wildlife. The results of the research will allow us to design an approach to quantify the impacts to humans, soil, water, plants and wildlife.

Phases Two and Three will encompass the use of quantified results to design prioritization and take inventory, and begin remediation of grow sites respectively.

Estimated Completion Date: April 1, 2019

Recommendation 2: Develop a methodology for prioritizing grow sites for reclamation and rehabilitation based on grow sites that pose the highest risk. Begin to reclaim and rehabilitate marijuana grow sites, starting with those that pose the highest risk.

Forest Service Response: The Forest Service generally concurs with this recommendation.

A site inventory form, which includes grow site data was developed to assist managers in evaluating and prioritizing sites for reclamation and rehabilitation.

Prioritizing reclamation and rehabilitation of grow sites that pose the highest risk could pose financial concerns, as it’s not always cost effective. Grow sites in close proximity to each other can be cleaned up at lower costs, as opposed to those with longer distances between sites.

Therefore, careful consideration and flexibility should be exercised in prioritization to ensure that the limited funds for reclamation and rehabilitation are used efficiently.

Estimated Completion Date: April 1, 2019

Recommendation 3: Develop policies and procedures outlining how to reclaim and rehabilitate grow sites to ensure consistency across all of the national forests. This guidance should outline the responsibilities and the communication requirements of the various Law Enforcement and Investigations (LEI) and national forest staff in the reclamation and rehabilitation of the marijuana grow sites.

Forest Service Response: The Forest Service concurs with this recommendation.

Development of national policies and procedures, outlining responsibilities and communication requirements of LEI and national forest staff, will be drafted by the LEI, Office of Safety and Occupational Health (OSOH) and Engineering, Technology and Geospatial Services (ETG) staffs, as the reclamation and rehabilitation of marijuana grow sites encompasses all three program areas.

Estimated Completion Date: April 1, 2019

Recommendation 4: Develop and implement a methodology for tracking the reclamation and clean-up status of all grow sites identified by FS.

Forest Service Response: The Forest Service concurs with this recommendation.

LEI has developed a marijuana site inventory form and master spreadsheet to record the data for each marijuana grow site, including reclamation and clean-up status. This spreadsheet captures data points such as hazardous materials, reclamation, and cleanup, can be organized by forest or region. Data fields relative to reclamation and clean-up status include: date of eradication, date of reclamation, number of plants eradicated, reclamation status (yes/no/ percentage of site reclaimed), hazardous materials, and coordinates for hazardous materials, and remarks. Guidance will be issued to prepare the form, including instructions for officials responsible for entering data and updating the spreadsheet, the location to electronically save the spreadsheet, and a list of officials with access to this information.

Estimated Completion Date: April 1, 2019

Recommendation 5: Create and implement standardized guidance and an inventory sheet requiring national forests to document hazardous materials at grow sites, as well as the locations of those materials.

Forest Service Response: The Forest Service concurs with this recommendation.

California has developed a standardized inventory form that will be used at all marijuana grow sites. This inventory form will include specific hazmat information for: manufacturer trade

name; active ingredients; solid/liquid; color; container type, size, condition, and level of contents. Specific location in the grow site where each hazmat item is located will also be recorded. Once finalized, this form will be sent out with standardized guidance requiring it be completed by the Case Officer, Agent, or Law Enforcement Personnel in charge of that operation for each site that is eradicated or reclaimed. The information captured on the inventory form will be entered into a spreadsheet that will record information for all marijuana grows in the region. This data will be broken down by forest and compiled for each region.

Estimated Completion Date: April 1, 2019

Recommendation 6: Modify the Supplemental Incident Report Form FS-5300-2a and the Law Enforcement and Investigations Management and Attainment Reporting System (LEIMARS) to include an entry for a seizure date.

Forest Service Response: The Forest Service concurs with this recommendation.

Over the last several years, we have been working with software developers to upgrade and enhance LEIMARS. For example, one modification includes adding a seizure date in the CSEAR-drug seizures tab to allow for a separate seizure date from the report date. Each type of seizure (plants, processed marijuana, etc.) will require a separate entry in CSEAR for Drug Type and Drug Activity Type. This enhancement is in progress. Modifications to the Supplemental Incident Report Form FS-5300-2a will also be made to capture the seizure date.

Estimated Completion Date: April 1, 2019

Recommendation 7: Provide guidance to LEI officials to ensure marijuana eradication data are recorded in the appropriate fiscal year.

Forest Service Response: The Forest Service generally concurs with this recommendation.

LEIMARS currently does not allow for separate seizure and eradication dates from the report date. This can result in seizure dates being reported inaccurately in the Controlled Substance Activity Report (CSEAR). Report dates can vary by months from the actual seizure and eradication date.

As previously mentioned in Recommendation 6, the Agency has contractors working to mitigate this issue. Once these updates are completed, guidance will be provided to the field to accurately capture and enter dates for all drug seizures, including eradicated marijuana.

Estimated Completion Date: April 1, 2019

Learn more about USDA OIG

Visit our website: www.usda.gov/oig/index.htm

Follow us on Twitter: @OIGUSDA

How to Report Suspected Wrongdoing in USDA Programs

Fraud, Waste, and Abuse

File complaint online: www.usda.gov/oig/hotline.htm

Monday–Friday, 9:00 a.m.– 3:00 p.m. ET

In Washington, DC 202-690-1622

Outside DC 800-424-9121

TDD (Call Collect) 202-690-1202

Bribes or Gratuities

202-720-7257 (24 hours)



In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotope, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET

Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.