Chapter 10

Relationship of Forest-Level NFMA Planning to National RPA Planning

Contents

Chapter 10

Relationship of Forest-Level NFMA Planning to National RPA Planning

INTRODUCTION

The **Forest and Rangeland Renewable Resource Plannning Act of 1974 (RPA) establishes a strategic planning process for an integrated, national examination of renewable resource conditions and opportunities for all forests and rangelands. The strategic planning process envisioned in RPA is structured around the preparation of four documents: the RPA Assessment, the RPA Program, the Presidential Statement of Policy, and the Annual Report. The RPA Assessment is to provide information on renewable resources--conditions and outputs, interrelationships, and present and future supplies and demands. This information serves as the basis for the RPA Program and the development of directions and goals. The Presidential Statement of Policy, transmitted with the Program to Congress, guides formulation of annual budget requests. The Annual Report informs Congress of the Forest Service's progress in implementing the RPA Program. Together, these four documents enable the Forest Service to develop along-term strategic plan to guide present and future management decisions.**

RPA also establishes a strategic planning process, at the local level, that stresses an interdisciplinary approach and public involvement. The National Forest Management Act of 1976 (NFMA) amended the original RPA legislation by providing substantial additional direction in preparing land and resource management plans for the national forests. These forest plans are intended to set long-term direction for on-the-ground management activities, including desired future resource conditions and subsequent management actions to achieve those conditions. In contrast to the national scope of the four RPA documents, the forest plans guide management activities at the local level. The plans take into account local situations, capabilities, and opportunities, and attempt to balance local resource uses and values to accommodate the public's interests.

If the strategic planning process envisioned in both RPA and NFMA is to be effective, national direction and goals must mesh with local capabilities. The RPA documents must incorporate information from the local level on resource availability and conditions as well as on public opinion, desires, and concerns. The information on local interests and capabilities must be available for use in the national analysis. Only with this meshing of national and local planning can the forest resources be managed sustainably for the future.

THE CURRENT RPA-NFMA LINKAGE

Congress did not envision a clear, direct system for meshing national and local planning efforts (329). The RPA and NFMA planning processes have been evolving slowly, however, to become more intertwined. Historically, the Forest Service has approached planning as a hierarchical process that allocates resource output targets from the RPA Program to the regions, and from the regions to the forests (206). This approach contrasts with the description of the linkage between RPA and NFMA in the Forest Service regulations as:

> **. . . essentially iterative in that the information from the forest level flows up to the national level where in turn information in the RPA Program flows back to the forest level (36 CFR 219.4(a)).**

In 1989, Forest Service Chief Dale Robertson (206) testified that the 1990 RPA process was influenced by an integrated approach, with "more careful consideration of the resource opportunities as developed in the forest plans. " This integration was accomplished by using data from the plans in the RPA Assessment and by building RPA Program strategies using forest plan standards and guidelines. Robertson stated that, because most of the forest plans are now complete and more comprehensive than earlier plans, data from the forest plans were used extensively in the 1990 Program. Thus, the 1990 program may mark the beginning of an iterative exchange of information, from the forests to the national level and the national level to the forests, contemplated in the regulations.

The historic pattern of top-down targets from the RPA Program to the national forests was possible before the completion of the national forest plans

297-904 II - 92 - 7

only because of lack of information. Many forests took 10 to 15 years to complete their frost plans under NFMA, providing little information from the local level to feed into the national process. The lack of final forest plans permitted the top-down flow of information to dominate, and led to allocation of resource output targets from the national level to the regions and forests.

RPA target allocations are difficult to mesh with NFMA planning because: 1) targets are set only for outputs and 2) allocated targets may be infeasible. Output targets are not necessarily incompatible with local level strategic planning, but forest managers do not have the measures to determine annual outputs for all resources. (See ch. 6.) Annual timber production can easily be measured, and is directly under the control of the managers, but recreation use, water flows, wildlife populations, and other uses and outputs are less easily measured, and less readily governed by managers. Furthermore, the RPA Program has not established effective targets-those for which managers can be held accountable-for resource conditions of forests and rangelands. Thus, RPA targets have become synonymous with national timber sale targets.

Equal treatment of all resources could be accomplished by setting national targets for all important outputs and conditions. This approach would require developing measures for nontimber values-an admittedly difficult task. Meaningful production and condition goals for recreation, range forage, water, wildlife, and fisheries have not been established, and reported accomplishments might be impossible to verify or to evaluate objectively (277). Nonetheless, accountability standards for all important forest and rangeland outputs and conditions are a prerequisite if the RPA process is to establish broad and balanced direction for the Nation's renewable resources.

Even if acceptable national targets are established for all significant outputs and conditions, the allocated RPA targets probably would not match the targets set in forest plans. NFMA plan targets are developed locally, with information on resource conditions and interactions and with substantial public input. The dilemma arises as to how to decide between allocated RPA targets and NFMA plan targets. Should national targets override the NFMA planning process when so much time and effort goes into local planning? Allocated RPA targets could make local analysis and public involvement in NFMA planning useless and ineffective, because targets are set by people removed from the local resource conditions and public desires. Alternatively, should the local planning process ignore the regional, national, and global concerns reflected in the RPA targets? NFMA planning targets could result in missed opportunities or regional dislocations not considered locally.

A second, and more serious problem in trying to mesh RPA targets with NFMA planning, is that allocated RPA targets maybe infeasible, despite the resource capability information in the NFMA plans. In past RPA Programs, resource production goals, especially for timber, have been a reflection of projected national demand more than a reflection of the resource capabilities to actually meet that demand (277). Even before NFMA was enacted, participants of a national symposium organized by the Forest Service at Pajaro Dunes, CA, discussed the need for data aggregation to proceed in a local ''bottom-up' approach (192). In addition, even with aggregated local data from the forest plans, national analyses of capabilities and opportunities necessarily lack information on site-specific resource interactions and conflicts. RPA analyses, therefore, will typically overestimate the productive potential of the lands being analyzed (72). (See ch. 7.) Thus, the national planning process under RPA is likely to overstate the opportunities for producing outputs from the national forests.

DIRECTION AND FLOW OF INFORMATION

The conflict between allocated RPA targets and directions established in NFMA planning might be alleviated if the flow of information between the forest plans and the RPA documents is continuous and two-directional. Precedent has been set for a process that is based on capabilities set locally, with general guidance from the top. In a 1988 court case, a Federal district court ruled that while production targets under a timber management plan are important goals, they are not legally enforceable decisions (277). The Chief of the Forest Service expressed agreement with this decision in an internal memo to the regional foresters (207).

The compatibility of output potential determined at the local level, and output goals determined at the national level, must be discussed and planning adjusted depending on national and local interests,

resource sustainability, and budget allocations. This approach would shift the RPA Program's emphasis from setting hard targets for the national forests to setting an overall direction for the Forest Service--for Research, State and Private Forestry, and International Forestry as well as for the National Forest System. The Program would guide national policies and identify considerations and approaches for NFMA planning. The NFMA plans would determine capabilities based on resource inventory and monitoring, public input, and local managerial expertise.

To summarize, the Forest Service regulations describe the information flow among the RPA documents and the forest plans as iterative. Information from the plans is used in compiling the RPA Assessment, and the plans and the Assessment contribute to the RPA Program, which then provides guidance for the forest plans. The problems created by this process could be alleviated with a continuous and interactive information flow among the four RPA documents and the forest plans.

NFMA Planning and the RPA Assessment

Data gathered to prepare the national forest plans and to monitor plan implementation provide basic information on resource conditions and predicted outcomes of proposed management actions, and on opportunities and limitations for expanding the uses and outputs of the national forests. Forest planners should be aware of resource demands outlined in previous Assessments and compare local assessments of physical, biological, and economic capabilities of the land with the national assessment, to assure that the conditions and possibilities considered in planning address national concerns (277). Standardized procedures and measures for inventories and monitoring can improve communication and minimize the costs of developing analytical models-each forest can take advantage of computer capabilities and models developed for the entire agency (51). (See also ch. 6.)

The RPA Assessment can assist forest-level planning by serving as a source book for planners. First, the Assessment provides information on methods used on national forests, private, and other public lands to collect data on resource outputs, conditions, and trends. This information can help planners design inventories and monitoring activities on their forests so that data will be compatible with previous inventories and with studies in progress. Measures used on the national forests must also be comparable to measures used on private and other public lands so that data can be aggregated and compared. Coordination of data measures allows information from the national forests and from private and other public lands to be used in a comprehensive analysis. These data are then available for national use in the RPA Assessment, Program, and Annual Report.

In addition, the RPA Assessment (and the supporting data) is a source of information for forest planners to consider in examining alternatives for their national forests. The Assessment is to describe the existing resource conditions and outputs from private and other public lands, as well as from the national forests. Forest planners can use the Assessment database to assess the extent to which various regional, national, and global concerns are being addressed on the lands surrounding their forest, and thus can assess the need for addressing such concerns in their forest plans. The RPA Assessment, therefore, is a source of information on inventory and monitoring measures and methods and on the conditions and outputs from lands surrounding the national forests.

NFMA Planning and the RPA Program

The forest plans can contribute to the RPA Program by providing information and guidance on the public's preferred management alternatives for the National Forest System. The forest plans are developed with substantial public input, and thus should describe locally acceptable management direction. Furthermore, the NFMA planning process identifies public issues and concerns relevant to the management of the national forests. Issues and concerns that are widespread at the local level should receive special attention in the Program. For example, a national policy on below-cost timber sales might demonstrate agency responsiveness to public concerns. In essence, NFMA plans are part of the public's participation in the RPA process.

As a strategic plan, the Program needs to set direction for all planning on the national forests as well as for research, cooperative assistance, and international programs. The Program, however, should not override local decisionmaking. Instead, it can augment NFMA planning by addressing regional, national, and global problems not identified

or considered locally. The Program can then include issues and concerns to be considered in amending and revising the forest plans, with a clear explanation of why such issues are of regional, national, or global concern and should be addressed in national forest management. This interpretation of the influence of the RPA Program on local planning is patterned after a theme of "firm central direction and maximurn individual autonomy' '—a theme common to effective organization in the private sector (195). This view was expressed by Chief Robertson in his 1990 testimony, stating that resource output targets will be replaced by more flexible, general guidance from the RPA Program (206).

Strategic planning does not require the elimination of national targets. In fact, targets may be critical to reaching stated goals for the various resources. Hard national targets, however, can effectively negate local decisionmaking, if targets are set only for certain outputs and only for the national forests. Such targets also tend to discourage an interactive flow of information from the local level to the national level and thus run counter to functional strategic planning and the iterative process. Alternatively, national output and condition targets can be used to identify impending or potential problems that are to be considered in national forest planning, in setting research priorities and in determining the financial and technical assistance needed by States and private landowners.

NFMA Planning and the Budget Process

The forest plans are intended to serve as the basis for developing the agency's annual budget proposal (217). However, the budget requests from the forests cannot simply be added together to arrive at a grand total for the National Forest System, because the forests have used different assumptions about possible budget levels in their NFMA plans. (See ch. 8.) Currently, the forests identify the appropriate projects for implementing the forest plan. These multiple-use projects must then be converted into budget requests by resource activity, and the budgets for each resource activity are subject to modification by the administration and Congress.

The Forest Service budget request for the National Forest System must be balanced against overall spending constraints and management priorities. According to Chief Robertson (206), the rate of forest plan implementation-and the mix of projects carried out under the plans-depends on the annual Federal budget process:

> [The] forest plans are strongly linked to and dependent on the national budget process. As we develop our annual agency budget request, we carefully consider the needs documented in the forest plans in light of competing agency priorities and constraints. Ultimately, the rate at which we are able to implement each plan-and the relative emphasis given to each component of the plan--reflects national priorities and constraints that are resolved as the President proposes a budget and the Congress appropriates funds.

Congress appropriates funds by resource activity. The appropriations are then allocated to the regions, and subsequently to the forests. The appropriations by resource must be converted back into multiple-use projects, not an easy task because it is unlikely that the appropriations will match the balanced mix of resource activities needed to implement the forest plans.

A better flow of information between the forest planning and the budget and appropriations process is needed for implementing the forest plans. Congress needs accurate information on the likely outputs and conditions that will result from implementing the plans with a given level of appropriations. Congress also needs information on the improvements possible with increased tiding, and on the consequences of reduced funding. Furthermore, the local publics need to know how the forest plan will be implemented, if the full funding called for in the plan is not appropriated. Thus, to be integrated with the budget and appropriations process, the forest plans must contain information on the likely outputs and conditions under a range of budgets, including both the most likely and the most desirable budget levels.

The budget and appropriations process also must be better integrated with forest planning. The current structure of appropriations by resource activity is inconsistent with the integrated, multiple-use management direction established in the plans. Congress may object to reducing the current budget details, fearing a loss of control over the Forest Service budget. However, actual expenditures and accomplishments often differ, sometimes substantially, from the appropriations and from the reported expenditures and accomplishments. Furthermore,

special accounts and trust funds account for more than a third of the Forest Service budget, but the substantial agency discretion over the size and use of these funds occurs with little congressional control or oversight. Thus, Congress has, in fact, already lost some of its apparent control in the appropriations process. Congress could reestablish control over the Forest Service budget while allowing the implementation of national forest plans by:

1. **appropriating funds by activity (e.g., planning, producing, maintaining, investing, monitoring) rather than by resource;**
2. **examining the use and discretion over permanent appropriations; and**
3. **requiring full disclosure of expenditures and unit costs for significant activities-regionally and fictionally.**

NFMA Planning and the Annual Report

Monitoring of the forest plans can provide information to be presented in the Annual Report on the expenditures and results of management activities on each national forest. This information can be used to compare the performance of forest supervisors and regional foresters, and thus can serve as an incentive for the Forest Service to make sure its efforts are balanced and efficient.

Peer pressure is an important component of quality performance. Thus, monitoring of forest plan implementation should provide information for the Annual Report on what each forest is doing and how well management activities have been implemented. Consistent reporting is necessary so that data can be aggregated and compared. Unit cost information is important, especially for certain critical activities and results, such as reforestation success, timber sale preparation and harvest administration, and wilderness quality improvements. Furthermore, as discussed earlier, measures are needed for all the important outputs and conditions, to assure that all goals are being achieved; finally, management activities, such as range improvements and watershed rehabilitation, must be related to the outputs and conditions of interest to Congress and the public.

A third connection between forest planning and the Annual Report may be the identification of important issues that arise quickly, in the time between RPA Programs. To address rapidly emerging issues in a timely fashion, the issues can be discussed in the local context and included in Annual Reports. In this way, forest planning and the Annual Reports can serve as issue scoping for each RPA program, and as a basis for considering new or revised policy direction for national forest management.

NFMA Planning, RPA, and the Role of the Regions

In the RPA and NFMA planning processes described in this OTA assessment, the regional offices serve three main purposes: to aggregate data, to allocate budgets, and to coordinate and facilitate problemsolving of regional scope.[1] Budget and resource data from all of the national forests are too unwieldy to accommodate directly at the national office. The regional offices can aggregate these data and present them to the national office in a manageable form. The regional offices also work with budget decisions from the national level, allocating budgets to the forests.

The regional offices' third role, to coordinate and facilitate problemsolving of regional scope, maybe especially important when problems involve several forests as well as State, private, and other public lands. The regions can identify issues common to several national forests, and can assist in coordinating responses and identifying issues that need to be addressed nationally, in the RPA planning process. The regional offices can also serve as a focal point for coordination with State agencies that have a stake in national forest management, including agencies that regulate forest practices, that manage wildlife populations, and that enforce water rights and water quality standards.

If the RPA Program is not seen as a document providing hard output targets and budgets to the forests, the regions would not be required to serve as a liaison in these areas. Rather, they could provide coordination between local decisionmaking (as the major impetus behind planning) and national policy guidance. The regions could assist in finding ways to deal with regional disputes and conflicting interests before they are brought to national attention.

[1]Regional offices undoubtedly serve other functions, as well, but this section focuses solely on their role in RPA and NFMA planning.

CONCLUSION

Concern over land and resource capability and sustainability has contributed to the debate over centralized, top-down planning versus decentralized, forest-based, bottom-up planning (277). Resource capability information developed at the local level was intended to provide the foundation for RPA planning; at the same time, national objectives are essential to strategic planning and setting long-term goals. National and forest level information ''address the nations's resources demands and recognize natural and practical limitations of the land and forests to meet those demands' (277).

Binding targets set at the national level in past RPA Programs have resulted in a concentration on timber outputs, at the expense of considering other outputs and conditions. Furthermore, national analyses are likely to overestimate productive potential, because site-specific resource interactions are necessarily lost in aggregating data on local capabilities. Replacing hard targets with general guidance and flexible goals would lessen the emphasis on top-down planning and allow for a more iterative process, as prescribed in the regulations.

A two-directional, interactive exchange of information between local forest planning and national RPA planning would encourage resources to be managed for realistic and desired goals and long-term sustainability. The forest plans can provide information: on resource capabilities for the RPA Assessment, on public desires for national forest management for the RPA Program, on opportunities and likely results for the annual budget, and on the results and costs of management for the Annual Report. The Assessment database can inform planners about conditions and outputs from neighboring lands, and about measurements and methods for inventorying and monitoring. The Program can provide policy direction for considering regional, national, and global issues and concerns. The annual appropriations determine the extent of implementation of the forest plans. And the Annual Report allows managers to compare their performance in implementing the forest plans with the performance of their peers. Thus, by improving the flow of information between local NFMA planning and national RPA planning, the national forests can be managed to achieve local desires, address national needs, and assure the long-term sustainability of the forest ecosystems.