Chapter 4
Audiences and Players

Congress envisioned RPA as a planning process that would ensure more orderly and responsible management of the Nation's renewable resources. Although the Forest Service had engaged in land management and forest and rangeland planning since its inception, it had never been directed to engage in such an ambitious and comprehensive long-range planning process as is required under RPA. Furthermore, RPA gave Congress and the public significantly greater roles and responsibilities in shaping resource plans and policies.

Congress intended that RPA serve the needs of four general audiences: Congress, the Forest Service, the Administration, and the public. The RPA Assessment and Program were to provide Congress with sufficient information and analysis on which to frame long-term policy and programs and to prepare annual budgets. RPA would serve the management needs of the Forest Service, by providing more comprehensive information on resource conditions and future trends, by establishing long-range goals and objectives to direct activities, and by assisting it in justifying its annual budget needs both to the Administration and to Congress. The RPA documents would substantially improve the Administration's ability to shape more responsible and balanced short- and long-term renewable resources policy and to frame budgets consistent with that policy. And finally, the RPA documents would provide the public with information sufficient to allow its expanded and continuous participation in the planning process.

Interest in RPA has remained relatively high since it was enacted in 1974, as reflected by the numerous symposia and workshops that have studied the process over the years. In addition, Congress commissioned a study of the process by the General Accounting Office (129), and has held several oversight hearings since the first set of documents were delivered in 1976. Despite this interest, there is a growing concern within each of the four main audiences that the RPA documents, especially the Program, are of limited and declining relevance to annual budgets and decisionmaking. In a 1985 study of RPA, the Conservation Foundation surveyed congressional staff and representatives of natural resource organizations, and concluded that "the RPA Program suffers a credibility gap" (89), and recommended that, to serve the needs of its constituents more effectively, the Forest Service should clearly identify RPA's audiences and concentrate on improving the quality of participation by those audiences.

CONGRESS

Expectations

As noted earlier, RPA was born in part from Congress' frustration with the Nixon Administration's annual Forest Service budget requests, which many Members felt had been consistently inadequate for meeting resource needs. The country lacked long-term goals and objectives for managing the Nation's renewable resources, and consequently lacked any strategy to preserve and protect those resources for use by future generations. In short, Senator Humphrey and others perceived that forest policy and planning, being a product of annual budgets, was dangerously short-sighted and fragmented.

Congress intended to create a systematic long-range planning process whose strength would be derived from the aggregation and analysis of comprehensive information on current resource quantity and quality, as well as on present and future supplies of and demands for those resources. Congress expected that acquiring and updating such a base of knowledge would lead to more informed, more rational, and probably better decisionmaking than had been possible, and designed the Assessment to serve this analytical function.

Congress then expected that the renewable resources Program would respond to the findings of the Assessment and to other available information. The Program is intended to set forth goals, objectives, and a recommended course of action for the management of the Nation's renewable resources. Senator Humphrey explained that:

> . . . the program is developed from the assessment and will describe in detail for a 5-year period what the Federal effort should be. This will include the plans on Federal lands, the cooperative efforts needed under the Federal program, and the research that will go forward to meet unsolved prob-

> lems. . . The annual budget request will thus be presented against a background of goals that the Congress will have considered based upon an executive recommendation (145).

While the law makes the Secretary of Agriculture responsible for the Assessment and the Program, Congress expected that both documents would be prepared by the Forest Service, and the Secretary has delegated the authority to develop the RPA Assessment and Program to the Chief of the Forest Service (36 CFR 219.4). The sponsors of the legislation believed that the Forest Service would play the lead role in the process and that RPA would provide "new stature and responsibility" to the agency (145). RPA permits the inclusion of alternative courses of action in the Program, but it requires that a preferred, or recommended, course of action be specified. This reflects Congress' intent that, while the Program is officially the Secretary's document, it would also provide insight to the agency's professional view of the direction renewable resources policy should take both in the short- and the long-term.

Another important RPA document, essential for Congress' oversight role, is the Annual Report. The Annual Report is to be delivered to Congress when the Administration presents its annual budget request. The Annual Report is intended to provide information on and an evaluation of accomplishing policy objectives, and to alert the Administration and Congress of any shortcomings and/or needed changes or modifications in policy. RPA requires that the Report sets forth 'progress in implementing the Program. . . together with accomplishments of the Program as they relate to the objectives of the Assessment, " and that objectives and accomplishments be described in both qualitative and quantitative terms. The Report shall also include plans for corrective action and recommendations for new legislation when necessary. By requiring delivery of the Annual Report with the President's budget request and "structured for Congress in concise summary form with necessary detailed data in appendices,' Congress anticipated that it could readily rely on the Annual Report to update, modify, or completely revise the Program and Statement of Policy, whenever necessary.

Congressional supporters of the RPA legislation did not conceal that a primary motive behind the passage of the law was to assert more congressional control over Forest Service budgeting and policymaking. The RPA Assessment and Program were intended to provide Congress with essentially the same facts that the Administration used in formulating its annual budget requests. The Act vested the President with the responsibility for the Statement of Policy to be used in framing budgets, but Congress reserved the right to rejector revise it. Congress also included provisions in the law to hold the President accountable for budget requests which were inconsistent with the stated goals and objectives set out in the program and Statement of Policy.

Nevertheless, RPA was not intended to set rigid goals, priorities, or budgets, but was meant to be a flexible process that could accommodate new information, changing conditions, new priorities, and fluctuating budget levels where warranted. Senator Humphrey explained that under RPA:

> . . . policy for renewable resources will be subject to revision as new facts become available. . . Both the Executive and the Congress must proceed in a flexible manner to adjust sights, redefine goals, and provide the financing as the facts warrant (145).

B/et only did Congress perceive this flexibility as sound policy, it also recognized that such flexibility was necessary to secure the Administration's support of the legislation.

While Congress preserved a substantial degree of flexibility in planning and policy, it clearly envisioned that any changes and revisions in direction would be premised on more comprehensive and integrated information than had previously been available, thereby leading to more informed decisionmaking. According to Bob Wolf, a congressional staffer who worked on the legislation:

> With RPA in place, it is possible to document whether in the quest to meet overriding national issues, we have impacted conservation goals and, if so, how ***(150).***

RPA as Implemented and Congress' Response

RPA is of limited use as a long-range planning process unless the documents are produced on time and serve the needs of the targeted audiences. Congress understood that RPA directed the Forest Service to engage in an ambitious resource planning process, unprecedented in scope and detail, and it also understood that by creating such high expectations it had assumed responsibility to oversee the

process, to provide the agency with feedback and ongoing guidance on how to meet congressional expectations, and to revise the law, if necessary.

The 1975 RPA Documents

After the first Assessment and Program were released in early 1976, Senator Herman Talmadge, chair of the Senate Committee on Agriculture, Nutrition, and Forestry, commissioned the U.S. General Accounting Office (GAO) to conduct a "separate evaluation of the 1975 RPA Assessment and Program from the standpoint of economics and good management of resources," explaining that "Congress must provide the agency with still more guidance as to how it should proceed in connection with the next Program and Assessment" (129).

GAO concluded that the documents suffered from several problems with organization and presentation as well as from deficiencies in the methods of analysis (129). For example, GAO criticized the Forest Service for failing to sufficiently discuss and highlight issues of broad national importance in a separate section of the Program. GAO recommended that the agency improve the format for presenting and discussing important issues so as to make the document more useful to both Congress and the public. The report also criticized the documents for the lack of regional analysis and failure to analyze adequately the relation between national forests and privately-owned forests.

In response to the GAO findings, Congress held oversight hearings to provide further guidance to the Forest Service before the next round of documents were due in 1980. In 1977, the House Agriculture Subcommittee on Forests, Family Farms, and Energy held 6 hearings around the country and received testimony from 180 individuals, resulting in 10 major findings and 27 recommendations for improvement (9).

The 1980 RPA Documents

A flurry of congressional interest and activity surrounded the development of the 1979 Assessment and the 1980 Program. Following the 1977 oversight hearings, "continued contacts-with individual members, their staff, and committee staffs in both the Senate and House provided a continuous exchange of information on process, issues, and planning during the next several months"(9).

The Administration, by May 1980, still had not submitted the 1980 RPA documents to Congress, and on May 27, the Senate Agriculture Subcommittee on Environment, Soil Conservation, and Forestry held a hearing seeking an explanation for the delay. The 1980 RPA Assessment, Program, and Statement of Policy were finally submitted by the President on June 19, 1980, and met with almost immediate disapproval from Congress. The Senate subcommittee held a hearing a week later to review the documents, and expressed serious concern that the 1980 Program had not included a recommended course of action as required by law, but rather had included only a range of program alternatives, with a high-bound and a low-bound.

In August, Senator John Melcher, chair of the Senate subcommittee, read a white paper into the *Congressional Record* outlining the subcommittee's concerns with the RPA documents, expressing disappointment especially with the Program and the Presidential Statement of Policy, and recommending that Congress work with the President to amend the 1980 Statement of Policy. While generally embracing the high-bound Program alternative, the subcommittee stated that major problems with the RPA documents made them of little practical use to Congress. The white paper outlined the following shortcomings:

- future targets for action are not well-defined, and there is no national focus;
- the Program provides a range of action levels for each program activity, avoiding the recommendation of a preferred Program as required by the Act;
- neither the low-bound nor the high-bound alternative defines the expected outcome for each resource in the 5 years ahead, the impact on future targets, or the best judgment of the professional land managers;
- the Program needs to consider timber supplies in a global context so that reasonable levels of supply can be anticipated from foreign, industry, non-industrial, and Federal lands. Barring this global examination, neither the effect of U.S. supply and demand on world resources, nor the appropriate timber goals for public lands, given multiple use and sustained yield constraints can be determined;
- the Program fails to adequately differentiate between capital and operational activities (64).

The white paper also expressed the subcommittee's disappointment that the Program did not adequately respond to the needs described in the Assessment. While commending the Forest Service for a "comprehensive and well prepared" Assessment, the white paper stated that, "with the possible exception of the timber resource, the databases [sic] used to develop Assessment information must be improved across the board as the programs proposed can only be as valid as the information available on which they are built" (64). The subcommittee expressed confidence that the land and resource management plans prescribed by the National Forest Management Act of 1976 would improve future Assessments.

Despite Congress' strong criticism of the 1980 Program and swift rejection and revision of the Presidential Statement of Policy, actual annual appropriations for 1981-85 closely approximated those budget levels set forth in the 1980 Program's low-bound alternative, which Congress had soundly repudiated. Although the budget requests reflected program mixes that were contrary to congressionally endorsed goals and objectives set forth in the revised Statement of Policy, Congress systematically approved them with little or no changes or revisions in the annual appropriations (84).

The 1985 RPA Documents

The 1985 RPA Program and Statement of Policy were submitted to Congress nearly 11/2 years late, and then only after the House Agriculture Subcommittee on Forests, Family Farms, and Energy had scheduled oversight hearings to review the Program. Earlier hearings were held for public comment with only an advance copy of the Program and a promise from the Secretary that a complete Program and Statement of Policy would be transmitted "very soon" (134).

Like the 1980 Program, the 1985 Program included two alternative levels of funding for the Forest Service-a high- and a low-bound. "The pattern of the 1985 Program [was] much the same as that of the 1980 Program except that initial funding levels [were] below those in 1980 and generally increased] at a slower rate . . . the low-bound call[ed] for zero growth for all programs across the board" (83). The 1985 Statement of Policy was a brief and general statement that, instead of supporting a recommended Program alternative, again embraced a "reasonable range of management directions, outputs, costs, and goals for the long-term future, [which] . . . provides Congress and the public with a valuable information base on which to continue their informed participation in the decisions affecting our National Forests" (81).

Criticism of the 1985 RPA effort echoed much of that which was heard in response to the 1980 documents. Although the Program and Statement of Policy were submitted so late as to be virtually useless to Congress for the purpose of framing the budgets for fiscal years 1986 and 1987, Congress' response to the 1985 RPA effort was tame compared to its response in 1980. Even the failure of the 1985 Program to address issues or to contain a recommended Program did not cause Congress to revise the Statement of Policy. While Congress showed interest in gathering advice on how to improve the process, it was once again clear that Congress could make little practical use of the RPA Program to shape forest policy and appropriate annual funds.

Meeting Congressional Needs and Expectations

Experience with RPA has caused many observers to question whether RPA can be of use to Congress in the manner expected by the framers of the law. According to Sample, RPA should be most useful when there is not enough money to go around, but the "RPA has never provided Congress with information adequate for making budget allocation decisions under constrained budget conditions' (85). One observer has suggested that past RPA documents have not been useful to Congress because they have failed to adequately address current social, economic, and environmental issues, while others have questioned whether Congress "institutionally could really handle long-range goals" (89). As Congress readies itself to address the 1990 RPA documents, it is worthwhile to examine some current congressional concerns and needs with respect to the RPA process.

Although the Program has consistently fallen short of congressional expectations, the Assessment has been said to have some value. Lyons and Knowles wrote:

> In general this document has provided a reasonable benchmark of the status of the Nation's renewable natural resources. Discussions of most resources in the Assessment document have been sufficiently complete to give some indication of where, as a

> Nation, we stand. This is especially true for resources associated with the National Forest System and, in particular, for commodity resources on the forests. Where the Assessment has failed, however, is to provide a more complete picture of the forest and rangeland resources on state and private lands and a report on the status of nontimber resources. . . (58).

They fault the Program and explain that its lack of utility to Congress is a function of a combination of flaws. They noted four particular problems which can be summarized as follows:

1. *Timing.* None of the previous Programs have been presented to Congress in time to guide budget decisions for the first year of the Program. Further, the RPA cycle is out of sync with the political cycles of Congress and the Administration. It is unlikely that a new Administration will accept and implement a program and Statement of Policy that were developed by a prior Administration.[1]
2. ***Format. The*** "high-bound/low-bound" approach used in the 1980 and 1985 Programs still fails to provide Congress with a clear, professional recommendation for how the forests should be managed. As the white paper stressed in 1980, Congress is more likely to respond to a recommended course of action, as is required by RPA.
3. *Continued lack of clear relevance of the Program to the findings of the Assessment. The Program* should, at a minimum, enable congressional observers and others to understand, in strategic terms, what long-range resource problems or situations exist (or are forecast) and what the agency recommends be done to address the identified problems.
4. *Continued failure of Program documents to demonstrate how the activities of the National Forest System, Research, and State and Private Forestry would function together to achieve the goals and objectives of the Program.* What is specifically lacking are statements of quantifiable goals and of the linkages among Forest Service programs that might indicate how each affects the other.

Lyons and Knowles (58) also assert that RPA has been ineffective because the Program has been unrelated to the President's annual budget and because the Forest Service's Annual Report has suffered from some major inadequacies in its function of evaluating Program implementation. These two problems attest not only to a lack of commitment to the process by recent Administrations, but also demonstrates that Congress, by accepting inadequate RPA materials, has not fulfilled its oversight responsibilities under the Act.

As an audience of RPA, Congress demands more from the RPA documents to guide its budget and policy decisions. On the other hand, as a key participant in the RPA process, Congress must be more committed to fulfilling its oversight responsibilities than it has been in the past.

THE FOREST SERVICE

With RPA, Congress elevated the stature and the role of the Forest Service in national renewable resources policymaking. Congress created a mechanism by which the Forest Service could map out its missions, goals, and objectives in a national setting. Although, the agency had been assessing resources and planning activities since its beginning, RPA gave legitimacy to long-term strategic planning and management by establishing a formal framework and procedure.

The Forest Service is the primary actor in the RPA process and played an active role in the development and passage of the Act. Its interpretation of the law and its expectations of the process heavily influence the nature of the documents as well as the interactions among the participants. How the agency perceives its role and how it defines and identifies RPA's audiences significantly affect the utility of the documents and the subsequent successes and failures in implementation.

Forest Service expectations of RPA can perhaps best be gleaned fromthe documents themselves—the methods of analyses, the organization, and the presentation. This task will be taken up in greater detail in the following chapters on the RPA documents. The section below briefly examines agency efforts to encourage and solicit outside professional review of RPA and evaluates the effects these efforts have had on the agency's perceptions and expectations of the process.

[1]This has happened in two of the first three RPA efforts: president Jimmy Carter was to implement the 1975 Program and Statement of Policy developed under President Gerald Ford, while President Ronald Reagan was to implement the 1980 Program and Statement of Policy developed under President Carter.

Pre-RPA Experience

Although RPA may well be the most ambitious long-range planning system ever employed by a Federal agency, the Forest Service has long engaged in a variety of assessment and long-term planning efforts for the Nation's renewable forest and rangeland resources. While some of these efforts were mandated by Congress, many others were instigated by the agency itself.

By 1928, Congress had vested in the Forest Service the authorities to manage the National Forest System, to establish cooperative assistance programs of financial and technical assistance to States and private landowners, and to engage in forest and rangeland related research. In 1933, the Forest Service completed a report entitled *A National Plan for American Forestry* (better known as the *Copeland Report)* which included an extensive inventory of forest lands and resources, a findings section detailing the "forest problem' in the United States, and several short- and long-term recommendations for action. The Report was intended to function as a "coordinated plan which [would] insure all of the economic and social benefits which [could] and should be derived from productive forests by fully utilizing the forest land, and by making all of its timber and other products and its watershed, recreational, and other services available in quantities adequate to meet national requirements" (144).

The Forest Service completed several studies, surveys, and appraisals of the forest resources over the next 26 years, though none matched the Copeland Report in detail and scope. In 1959, the agency completed an extensive long-term plan entitled *Program for the National Forests,* and in 1961, shortly after the passage of the Multiple-Use Sustained-Yield Act of 1960, the Kennedy Administration revised and expanded that plan in a document entitled the *Development Program for the National Forests.* Another multi-resource long-range plan developed before RPA was a draft Forest Service plan entitled *Environmental Program for the Future,* described in the 1972-73 Report of the Chief (101).

RPA differs significantly from those earlier assessment and planning efforts in that it is defined by statute rather than by the agency. It mandates a more formal, systematic, and integrated planning process, and it requires the agency to provide charnels for public participation.

Expectations and Implementation

Although RPA originated in Congress rather than in the Administration, the Forest Service played an active role in its development and passage. Top officials of the agency, including the Chief, supported the legislation, viewing it as providing much needed legislative sanction for long-term planning. "Once satisfied with its essential features and organization, the agency actively pushed the [RPA bill] within the administration by countering and thus eroding OMB arguments against it" (54).

Congress clearly expected RPA to substantially improve the Nation's long-range resource planning and policy. While Congress and the public had participated to some extent in Forest Service planning before 1974, RPA expanded their roles in the process, and therefore demanded more accountability on the part of the agency. It is unclear, however, whether top agency officials viewed RPA as significantly changing the manner in which they had traditionally developed long-range resource management objectives and plans. It is therefore useful to examine the agency's planning efforts since 1974 to discern whether its own expectations of RPA approximate those of its audiences. This examination involves two issues. First, has the Forest Service modified its performance in response to outside review and criticism of the RPA process? And second, do the documents themselves reflect any changes in expectations?[2]

Reviewing the **Process**

The Forest Service assembled an RPA staff and began to prepare the first RPA documents immediately following the enactment of the law. The agency completed drafts of the frost Assessment and Program a year later, in August 1975 (54). Following reviews by State and local governments, academics, public and private interest groups and individuals, and other Federal agencies, the Secretary transmit-

[2]This section examines the extent t. which the Forest Service has solicited and responded to congressional and public participation and review. The last section of this chapter explores public participation and its impact on planning in greater detail; chs. 6 through 9 evaluate the documents themselves more closely.

ted the final documents to Congress by that December, as required. Although, this first round was viewed by many as a "trial-run" (84), the Assessment and Program were subjected to intense scrutiny almost immediately.

In addition to the GAO study discussed earlier, RPA was the subject of a symposium sponsored by the Forest Service and the University of California at Berkeley, at Pajaro Dunes, California, in 1976. The objectives of the symposium were "to encourage academic participation in constructive criticism of the first Assessment and Program, so as to provide the Forest Service with assistance in developing future assessments and programs' (103). In addition to highlighting certain shortcomings in the Act, symposium participants evaluated and critiqued the 1975 RPA documents, generally concluding that "given the time constraints, the Forest Service did a remarkable job . . . [although] a better job should have been done' (103). The symposium participants concluded that the most significant weakness in the 1975 RPA effort was "the absence of an explicit structure explaining the relations among the various assessments of demands and the various programs that resulted from those assessments" (103). They suggested that what was needed was "a more rigorous planning process that increases accountability by allowing the agency to retrace planning decisions" (103).

Since 1976, the Forest Service has engaged in a series of cooperative efforts with individuals and organizations to review the RPA process. Perhaps the most notable is the agency's association with the Conservation Foundation. Before completing the 1980 RPA Program, the Forest Service contracted with the Conservation Foundation to hold a series of educational and informational workshops on RPA around the country for both the public and agency staff, which eventually resulted in *A Citizen's Guide to the Forest and Rangeland Renewable Resources Planning Act (107).* As was true with the 1976 symposium, this study provided a probing and comprehensive analysis of the RPA process, including a critique of the 1980 RPA Assessment and Program. This contract ended in 1981, but the Conservation Foundation has continued to actively study and review the RPA process.

Other efforts to evaluate RPA have included *The RPA Process: Moving Along the Learning Curve,* sponsored by Duke University (93); *Forests in Demand: Conflicts and Solutions,* sponsored by Dartmouth University (46); and *Redirecting the RPA,* sponsored by Yale University (13). These workshops supplement the public participation provided for in the Act, and give the agency an independent professional analysis of its performance in meeting the expectations of various outside interests. In the foreword to *Forests in Demand,* then-Chief R. Max Peterson implied that the agency relies on these outside analytical efforts to modify the ways in which it plans under RPA when he wrote, "This sort of informed discussion and analytical thinking will enable us to improve our forest resource planning in the decades ahead" (79).

Adjustments and Responses

Despite the numerous, extensive reviews of the RPA process, many question whether the Forest Service has adequately modified the process and the documents in response to the needs and expectations of its audiences. As discussed above, many congressional staff members and interest group representatives support the RPA as a concept but question its utility. According to Shands (89), the Forest Service has consistently failed to clearly identify its audiences and thus has failed to produce RPA documents which respond adequately.

Some attribute the growing public indifference to RPA to the perception that RPA planning has had only a minimal impact on budgets and decisionmaking within the Forest Service. This perception may well be an accurate one. A growing number of interests groups have cited the widening gap between targets and budgets as evidence of the Program's irrelevancy to decisionmaking (89). According to Sample, similar perceptions of RPA exist within the agency itself:

> Beyond its impact in constraining the choice of timber sale levels in forest planning, the RPA is regarded by nearly all forest supervisors and district rangers-the key line officers actually directing resource management on the national forests—as being of little or no assistance or relevance to their program planning or daily decisionmaking responsibilities (85).

It is important to note that the agency solicited internal feedback on the Draft 1990 RPA Program. In 1989, the Chief sent a pamphlet to agency employees asking them to review and comment on the Draft; this request resulted in 469 employee responses. The decision to solicit internal feedback

may have been prompted by the 1989 founding of the Association of Forest Service Employees for Environmental Ethics (AFSEEE), a group of more than 1,000 employees concerned with the future direction of agency management. Nonetheless, such internal feedback may provide the kind of information needed to make RPA more relevant to agency operations.

Since 1975, Congress and the public have also criticized the agency for failing to tighten the connection between the findings contained in the Assessment and the recommendations put forth in the Program. In spite of this criticism, and the Act's requirement that the Program must be based on the Assessment, the Forest Service still seems to have a different perception of the relationship between the two documents. According to Thomas Mills, Director of the RPA staff, the Assessment and Program have largely been separate efforts (65). And although the agency asserts that it is improving the linkage between the two documents, the connection between the Draft 1990 Program and the 1989 Assessment is not obvious.

To date, it seems that the agency has inadequately met the needs of its audiences, indicating either that outside expectations are too great, are unrealistic, or simply differ substantially from those of the agency.

THE ADMINISTRATION

The Administration, through the Secretary of Agriculture and the Office of Management and Budget (OMB), is ultimately responsible for producing the RPA documents and for developing annual Forest Service budget requests consistent with those documents. Because the Forest Service has been delegated the responsibility to develop the Assessment, Program, and Annual Report, the Secretary and OMB should be viewed not only as players in the process, but as audiences as well.

The Secretary is responsible for submitting the Assessment and Program to the President, who in turn submits them to Congress, along with a Statement of Policy. But while the Secretary has the authority to disapprove the materials prepared by the agency and to revise them at will, it is unclear to what extent the Secretary exercises this authority. The Secretary has provided the agency with some direction in the past, but it appears that this role has been limited. Fedkiw has described the importance of the Department in developing the 1980 Program *(28),* but the Department's influence in the 1975 and 1985 efforts is not well-documented. The RPA documents appear to have been substantially a result of Forest Service efforts.

On the other hand, OMB clearly plays an active and major role in the RPA process. As chief architect of the President's annual budget requests, OMB is responsible for coordinating programs and balancing spending priorities among all Federal agencies, within overall fiscal constraints. In the context of RPA, the Assessment, Program, and Annual Report could supply sound justification for agency programs and provide sufficient information to meet the President's needs in writing the Statement of Policy and OMB's needs in framing annual budget requests.

Expectations

As discussed above, RPA was born largely from Congress' frustration with the Administration's short-sighted resource management policies and inadequate budget requests. With this Act, Congress intended to exert more control over the Forest Service's planning and budgeting processes, and to establish a certain measure of Presidential accountability which had been lacking. The required Presidential Statement of Policy is to be based on the Assessment and Program and to be used to frame annual budget requests. Most importantly, in any instance in which budget requests fail to meet the established policies, the President is required to explain publicly the reason(s) for requesting Congress to approve the lesser policies or smaller programs than' those presented in the Program and Statement of Policy.

The Administration generally supported the purpose of the RPA legislation, but fervently opposed those accountability provisions which it construed as limiting 'presidential flexibility and discretion in preparing annual operating plans and attendant budget requests" (145). In a letter to the House Agriculture Committee, then-acting Secretary of Agriculture Carroll Brunthaver wrote:

> The regular appropriations process allows ample opportunities and an orderly process for questioning Presidential fiscal priorities and should continue to be relied upon as the appropriate forum for handling budget questions and issues (145).

In spite of the Secretary's opposition, Congress passed the legislation with the disputed language

intact; OMB promptly recommended that the President veto the legislation. While President Ford expressed some concern over those provisions relating to Presidential discretion, he signed RPA into law stating that:

> . . . the benefits of this legislation far outweigh any potential drawbacks, and I am confident that the Congress and the executive branch, working together, can and will manage, develop, and improve our priceless natural legacy of forests and rangelands (29).

Aside from its opposition to the accountability provisions of RPA, OMB saw great promise in the rest of the legislation. Having regarded previous Forest Service national planning efforts as 'no more than program promotion devices lacking any real analytical justification for the increased budgets that were called for, " OMB perceived that RPA documents could potentially provide the "detailed analytical bases needed to justify Forest Service funding requests" (84).

Implementation

The Secretary and OMB played only minor roles, if any at all, in the 1975 RPA process; the effort was almost exclusively that of the Forest Service. However, the Secretary and OMB took a more active interest in the 1980 process, after Congress decided to appropriate 85 percent of the recommended Program level for 1978.

The Secretary viewed this funding approach as inconsistent with the analytic underpinnings of RPA, believing that neither Program development nor annual budgeting could adequately be done unless the Program decision process "was based on increments of management effort on a resource-by-resource basis . . . On the basis of the 1975 RPA Program, which presented highly aggregated, multiple-use alternatives, the Department decisionmakers were unable to comprehend and make informed decisions among alternative levels and mixes of resource outputs and the total costs for such alternatives" (28). While the Forest Service maintained that its "multiple-use" approach would more likely result in a management program that was more consistent with its mandate and which could be physically, economically, and environmentally implemented, the Department's final decision was to adopt the 1980 Program on a resource-by-resource basis (28).

OMB also showed a keen interest in the 1980 RPA process. According to Fedkiw, OMB was dissatisfied with the weak RPA analyses, and concluded that there was a high degree of uncertainty in the demand and supply projections. OMB therefore recommended that the 1980 Program include a wider range of outputs than was suggested by the Secretary and the agency, and instead of a recommended Program as mandated by RPA, OMB developed and advocated a high- and low-bound range of options (as described in ch. 7) to retain the Administration's budget flexibility (28). Sample (85) suggests that the high- and low-bounds resulted from disagreements between the Forest Service, trying to respond to the Assessment, and OMB, rejecting the agency's ambitious plans. Presenting both views instead of one recommended Program was the Administration's compromise in the face of congressional pressure to release the documents.

The extent to which the Secretary was involved in the development of the 1985 RPA Program and supplemental Assessment is not clear. What is apparent, however, is that the Secretary withheld the RPA documents from Congress for over a year and a half after they were due; however, some observers attribute this delay to objections by OMB (84).

OMB's influence in the process was once again apparent in the 1985 Program's use of the high-bound/low-bound approach. And once again, OMB attempted to preserve flexibility in the annual budget process for the Administration by including a wide range of resource output levels in the recommended Program.

Future Role

It seems apparent from these experiences that the Administration, especially OMB, requires at least two things of the RPA documents. First, it demands that the documents provide clear and reasonable analysis of projected output levels and budget needs for each resource rather than on an aggregated, multiple-use basis. Second, it seeks a wide-range of viable alternatives, rather than a single recommended Program, so that it can respond flexibly to a variety of fiscal conditions. Until the Forest Service better meets these needs of the Administration, it is highly likely that the Secretary of the Agriculture and OMB will continue to strongly influence future RPA documents.

RPA documents could be substantially more useful to OMB if the Forest Service improved its methods of economic analysis (84). A lingering feeling exists among OMB officials that the RPA Program has "degenerated to little more than another agency promotion device without adequate analysis to support its budget recommendations' (84). Sample cites two specific examples of the Program's analytical weaknesses. First, OMB believes that the Program fails to provide a straightforward marginal benefit/cost analysis of proposed increases in funding, and that nearly the same incremental benefits could be obtained at much lower incremental cost for many Forest Service activities *(84).* Second, OMB is critical of the methods used by the Forest Service to impute dollar values for nonpriced resources; specifically, prices placed on nonpriced resources are not analytically comparable to prices for market resources (84).

It is clearly within the Forest Service's capacity to improve its economic analyses in RPA. Presumably, if it does so, OMB will rely more heavily on the Program than it has in the past in developing the annual budget. It is questionable, however, whether the agency itself can meet the Administration's demand for flexibility in the budget process, without violating the spirit and intent of the law, which requires that the agency present a single recommended renewable resources Program.

THE PUBLIC

In creating RPA, Congress recognized the inherently political nature of long-term planning for lands and resources. Before RPA, national level planning was a less open process. The Forest Service typically welcomed outside review and comment, but it was not explicitly required to do so. RPA opened the agency's national planning process to public scrutiny and participation in two significant ways: first, it established a congressional forum for Forest Service policy and budgeting by providing a considerable oversight role for Congress; second, it mandated public participation in the agency's national planning process.

Although the Act does not include specific standards and guidelines for public participation, it requires that the Program be developed in accordance with the National Environmental Policy Act of 1969 (NEPA). NEPA generally establishes a host of procedures by which a Federal agency solicits, uses, and responds to public comment.

The following section examines the expectations and role of the public in Forest Service planning and policymaking at the national level, and considers whether RPA, as implemented, has satisfied those expectations. In addition, this section examines how the Forest Service has used public input and whether public participation has had any identifiable impact on the RPA Programs. Finally, it addresses potential roles for the public in future RPA efforts.

Who Are the Publics?

To understand the expectations of the "public," it is important to distinguish who the various publics are. Several general labels are frequently used to compare and contrast broad categories of publics: users and non-users of resources; commodity and amenity interests; business and non-business interests; conservationists and preservationists; industry and environmentalists. Although these labels are somewhat descriptive of the general points of view of the various interest groups, they do not reveal the diversity of objectives of the individual interests composing those larger groups, nor do they illuminate how these varied interests overlap, compete, or complement each other. This section will examine two broad RPA interest groups-environmentalists and business interests-and will identify some of the individual interests that comprise each group.

Environmentalists

The environmental movement includes a multitude of individuals, groups, and associations representing a wide range of interests and dedicated to a variety of purposes. Environmental groups are generally concerned with the amenity resources and values of forests and rangelands, such as wildlife, outdoor recreation, streams and lakes, wilderness, and scenery; they include backpackers, hunters and anglers, birders, trail bikers, recreational vehicle tourists, and so forth (91). While these groups are loosely bound by a common interest in the amenity resources, as opposed to commodity resources, their objectives are diverse and often conflict with one another. As Shands notes:

> Some advocate preservation of wildland with minimum management both for recreation use and to provide ecological services-maintenance of water and air quality, gene pools, and so forth. Others favor

> fairly active management to provide habitats for huntable species. Some like roads through the forests, others abhor them. . . Some see the forests [and rangelands] primarily as a place for active recreation, others prize them for existence values and the ecological services they provide (91).

But despite some differences, individuals and groups aligned with each of the above interests came together in support of RPA as it was making its way through Congress. Many of these groups shared the same concerns: that there had been substantial and disproportionate increases in the amount of timber harvested in the past decade, and that the Forest Service's interpretation of its multiple-use mandate was out-of-step with public values (92). Dan Poole, of the Wildlife Management Institute, testified to the Senate Agriculture Subcommittee on Environment, Soil Conservation and Forestry that:

> [T]he central issue. . . is the urgent necessity to achieve and maintain balance in the national forest management program. Arguments over such issues as clear cutting, log exports, and all the rest are indicative of the current imbalance in the national forest program (145).

Thomas Kimball, of the National Wildlife Federation, voiced support for RPA because its principles were "environmentally sound," and because it enhances more "balanced multiple-use management of national forests" (145).

Members of the environmental community perceived RPA as providing a mechanism through which they could engage in an open and continuous dialog with the Forest Service. It represented a legally mandated channel through which they could express their concerns directly to those in charge of managing the forest and rangeland resources. Most importantly, RPA represented a comprehensive and systematic planning approach that would force the Forest Service to practice "more balanced" multiple-use and sustained-yield resource management.

Business Interests

There are several distinct interest groups that can generally be described as "business interests." Again, while they share some common goals and perspectives, it is important to keep in mind the diversity of interests and objectives held by the various groups in this category.

There at least four primary kinds of **businesses** with an acute interest in Federal forest and rangeland policy and planning-timber processing, recreation businesses such as ski areas, ranching, and mining (41). These businesses typically invest in relatively long-lived assets and each is tied to a specific location once it has made an investment. Although some of the individuals engaged in the above businesses do not actually use Federal lands or resources, Federal policies often have important implications for their business decisions. For example, recreation businesses operating exclusively on private land must, directly or indirectly, compete with those businesses operating on Federal land, and thus have an interest in Federal resource management policy (41).

Business interests generally testified in favor of RPA and supported the basic principles underlying the legislation. Like the spokespersons from environmental interests, representatives from various businesses perceived RPA as establishing a more orderly, logical, and comprehensive framework for resource planning and management. Representatives from the timber industry, probably the most vocal business group to testify at congressional hearings, saw RPA as a way to eliminate some of the controversy generated from previous piecemeal planning efforts. Perhaps most importantly, they believed that RPA would expose the importance of developing long-term forest and rangeland planning, thereby encouraging Congress to increase Forest Service funding to increase the development of the national forests. Speaking on behalf of the National Forest Products Association, John Hall testified:

> We think [RPA] is a tremendous first step in helping to develop the undeveloped potential of the National Forests, not only for timber but for wildlife, watershed, recreation, and other uses. . . [T]he separate consideration of each resource activity has resulted in controversies and stress which could be avoided with a coordinated plan (145).

Others from the timber industry also perceived RPA as providing justification for increased investments in Forest Service programs, and especially in the National Forest System lands. Bill Hagenstein, of the Industrial Forestry Association, stated that RPA would provide the Nation with a' 'new national forest outlook and program for the future" which would recognize the potential of the national forests to provide "more jobs, more timber, more grass,

more wildlife, more recreation, more water, more support for local government" (145).

Business interests typically look to RPA to meet at least four basic needs (41). First, they require a certain degree of predictability: by establishing both a short- and long-term direction, RPA could reduce some of those uncertainties common to the marketplace. "Only in times of crisis do they expect that government should change its course substantially' (41). They also look to the Forest Service to work with them to create a good business climate. This involves providing channels through which business can communicate their views to the government. Third, they expect the Forest Service to provide accurate, timely, and aggregated information that can be used in making business decisions. And finally, they believe the government should provide them with relatively low-priced land and/or resources.

Both environmental and business interests saw value in the planning procedures established by the Act. RPA provided a forum for all publics to review draft RPA documents and to communicate their needs and concerns directly to the Forest Service. Some interpreted the law as providing the public with the opportunity to serve as a sort of consultant to the agency. Each of the interest groups lauded RPA for its potential to bring about a more orderly, more logical, and longer-term planning process for the Forest Service. Each seemed to believe that they could promote and advance their particular interests more effectively with a more coordinated system in place.

RPA as Implemented: Meeting the Public's Expectations?

In 1982, Gene Bergoffen, director of the Forest Service efforts for the 1975 Program, wrote that the RPA process was in "critical danger of rapid atrophy,' and that the 1980 Program had fallen short of expectations in two fundamental ways:

> First, it has not become a tool for policy choices. It does not provide a way of measuring the effects of short-term resource actions on long-term trends in forest outputs and related socioeconomic concerns. Second, it does not serve as a basis for holding accountable the decisionmakers in the Forest Service, the Administration, and the Congress (10).

In 1985, the Conservation Foundation conducted a study to evaluate how useful the RPA documents had been to the public-at-large and to Congress. While most of the persons interviewed supported the principles underlying the law, many expressed frustration with the quality of the documents and questioned RPA's relevance to decisionmaking.

In 1986, the House Agriculture Subcommittee on Forests, Family Farms, and Energy held two oversight hearings on the 1985 RPA Program. The subcommittee solicited testimony from a wide variety of witnesses including representatives from environmental groups, business interests, professional associations, and academia. Again, witnesses generally supported the RPA process, but almost all of them noted significant shortcomings in the 1985 RPA Program.

Mark Rey, of the National Forest Products Association, testified that the 1985 RPA Program failed to address long-term resource needs and goals effectively. "[T]he Program sacrifices many of the Nation's resource needs in favor of shorter term budget or fiscal objectives" (82). Speaking on behalf of the Society for Range Management, Peter Jackson testified that the assessment of public and private rangeland resources had been and continued to be seriously underfunded and that as a result planning for the range resource through RPA was poor in comparison to planning for other renewable resources. "For federal lands, revising priorities so that basic resource values like soil, water, range and wildlife habitat are in better balance with timber production and mineral exploitation seems clearly the most urgently needed change" (49).

Environmentalists also expressed concern that the 1985 RPA Program continued disproportionately to favor some resources over others, and that the plan still failed to address sufficiently long-term resource conditions and needs. Speaking for The Wilderness Society, Peter Kirby alleged that despite RPA, the Forest Service's interpretation of multiple-use continued to be flawed:

> [T]he 1985 update of the RPA program continues and even expands the dominant use of the national forests for timber, mining, and grazing at the expense of recreation, fish and wildlife, wilderness and watershed. . . [A] very different program is required if the national forests are to provide the benefits and uses wanted by the American people in the future (51).

Public sentiment today echoes those earlier criticisms, with calls either to make the process more

useful, or to do away with it. The number of groups and individuals who participate in the RPA dialog has substantially decreased since 1975. During the 100-day public comment period for the 1975 Draft RPA Program, the Forest Service received 3,450 public comments, along with 77 petitions (102). In 1980, the agency received only 1,700 public comments, less than half the number received in 1975. In 1985 there was a slight increase, to 1,800 public comments, but in 1990 public response sharply fell. By October 3, 1989, when the period for public comment closed, the Forest Service had received only 250 comments on the Draft Program from individuals (other than employees), interest groups, and other agencies and officials (92).

According to the 1985 Conservation Foundation survey, many felt that RPA simply required too much time relative to its influence on Congress or the Administration (89). It appears that this belief is even more widespread today.

Forest Service Use of Public Participation

Congress intended that the public would play a significant and meaningful role in the RPA planning process, and required the Forest Service to establish procedures guaranteeing interested members of the public the opportunity to help shape the issues to be addressed in the RPA documents and to review and comment on each RPA draft Program. The public's disappointment with past RPA efforts poses questions of to what extent and how well the Forest Service has used public participation in its national planning process: does the agency perceive its publics as mere reviewers of draft Program alternatives or as consultants to the process?

NEPA regulations require Federal agencies to involve interested members of the public in the process of "scoping." Scoping is defined in the regulations as "an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action" (40 CFR 1501.7). Notice of the agency's intent to engage in such a scoping process are to be published in the *Federal Register* and shall expressly invite participation by any interested persons. In addition, the regulations require that agencies actively solicit public participation throughout the environmental impact statement (EIS) process; the agency is required to:

> (a) Make diligent efforts to involve the public in preparing and implementing their NEPA procedures, and (b) provide public notice of NEPA-related hearings, public meetings, and the availability of environmental documents so as to inform those persons and agencies who may be interested or affected (40 CFR 1506.6).

NEPA contemplates that agencies will use public input to help them identify important issues and concerns and to assist them in shaping the agenda for the proposed action or plan. The Forest Service has indicated that public participation in the RPA process should serve as an "early warning system" of emerging conflicts and new values (92).

Since the first RPA effort in 1975, the Forest Service has actively solicited public comment and review. For each of the previous iterations, the agency has distributed thousands of copies of draft Programs and has conducted numerous public meetings nationwide. In addition, as discussed above, the agency has co-sponsored and funded several workshops on RPA with various universities and private organizations. Nevertheless, some critics of RPA assert that Forest Service has yet to use public participation in a manner consistent with the spirit and intent of NEPA and RPA.

Between 1975 and 1985, "[t]he RPA process did not serve as a forum for public deliberation and policy. Rather, comments from groups and individuals alike were transformed into bureaucratic restatements of issues relating to intra-organization conflicts, e.g., timber versus wildlife, water versus grazing, and so forth" (92). After having reviewed the 1975 RPA Program and its treatment of "major issues of public concern, ' Shannon questioned whether the list of 66 issues was either comprehensive or representative, and asserted that the agency seemed to be deliberately avoiding more contentious issues, such as clearcutting in the national forests (92).

Shannon also criticized the agency's analysis and presentation of public comments in the RPA documents, and asserts that summaries of public comments are typically "disembodied from any real social, political, cultural or historical context," leaving the reader with the impression that he "has heard all this before . . . While the array of dissected comments attests to the differences among those concerned about the use of the [resources and their] management, this process cannot be considered

political dialogue in any form" **(92).** Not only is it difficult for agency officials to evaluate public expectations and demands, but the various publics cannot learn much about each other either. Another critic asserts that instead of advancing the interests of the various publics, RPA has transformed the various views into polarizing issues and has thereby discouraged meaningful interaction among the various interests (20).

Congress intended that the public would significantly influence the strategic direction of the Forest Service by actively participating in scoping and in discussion of important issues. The role that the public plays in defining and developing national renewable resources policy in the future will largely be determined by future efforts by the Forest Service to solicit, analyze, and incorporate public concerns into the RPA process.

The Forest Service appears to have made a serious effort to be more responsive to public participation in the 1990 RPA effort. The Draft 1990 Program includes a chapter on proposed agency roles as well as a discussion of contemporary resource issues. The proposed future roles appear to be largely derived from broad issues that surfaced during the development of the 1985 Program. The discussion of issues directly responds to recurring public concerns.

In a speech to the National Audubon Society in 1989, George Leonard, Associate Chief of the Forest Service, announced:

> The Forest Service is offering an outstretched hand. I invite you to join us in exploring some new ways of doing business. . . I am willing to ask our people to make a greater effort to open up their deliberative and decisionmaking processes so that others can feel like they own apiece of the solution, rather than feeling that they must stand off to the side and throw stones (92).

The extent to which the agency meets this challenge will largely influence the utility of future RPA documents to both Congress and the public.