

# Planning Rule National Advisory Committee - Recommendations on the Development of Assessments

**National Advisory Committee for  
Implementation of the National  
Forest System Land Management  
Planning Rule**

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- Susan Jane Brown, *Blue Mountains Forest Partners*
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- Joan May, *San Miguel County Commissioner, CO*
- Peter Nelson, *Defenders of Wildlife*
- Martin Nie, *University of Montana*
- Candice Price, *Urban American Outdoors*
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- Lorenzo Valdez, *Rio Arriba County, NM*
- Ray Vaughan, *Noted Author and Raconteur*
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December 1, 2015

Tom Vilsack  
Secretary, Department of Agriculture  
1400 Independence Ave., SW  
Washington, D.C. 20250

Thomas L. Tidwell  
Chief, U.S. Forest Service  
1400 Independence Ave., SW  
Washington, D.C. 20250-0003

Dear Secretary Vilsack and Chief Tidwell:

The National Advisory Committee for Implementation of the National Forest System Land Management Planning Rule (hereafter Committee) is pleased to offer our recommendations on the development of assessments as an important component of the planning process.

As defined in the 2012 planning rule, “[A]n assessment is the identification and evaluation of existing information to support land management planning” (§219.19).

The Committee believes that assessments are a key part of the adaptive planning framework put forth in the 2012 rule, with the intent of creating “a responsive planning process that informs integrated resource management and allows the Forest Service (USFS) to adapt to changing conditions, including climate change, and improve management based on new information and monitoring” (§219.5).

### Background:

From October 2014 to January 2015, a working group of the Committee reviewed the assessments thus far completed (Natahala-Pisgah National Forest (NF), Francis Marion NF, El Yunque NF, Sierra Nevada NF, Nez Perce–Clearwater NF, Cibola NF, and Flathead NF). To guide and focus our evaluation, we used an open-ended evaluative rubric containing a number of questions under five broad themes emphasized in the 2012 Rule and the 2014 Draft Directives (see attached “evaluative questions and criteria” form).

Members of the working group were assigned to particular content areas that must be evaluated in assessments (§219.6). The working group also benefitted from various learning calls and presentations in which USFS personnel discussed issues regarding the writing of assessments and answered questions by the group.

The Committee deeply appreciates the amount of effort devoted to the preparation of assessments by the different USFS planning teams involved. Committee members read assessments that did an outstanding job of situating national forests in their broader landscapes while identifying the forest's distinctive roles and contributions. Such assessments were outward looking and analyzed a range of transboundary issues, challenges and opportunities. This information could possibly set the stage for a more "all-lands" approach to planning.

### Observations

*1) Revision efforts should make stronger linkages between the assessments and the need-to-change documents.*

The information analyzed in assessments should be used "to identify a preliminary need to change the existing plan and to inform the development of plan components and other plan content." (§219.7(c)(2)(i)). Similarly, the assessment report should describe "a clear base of information for identifying a need to change the plan" (FSH 1909.12, ch. 10, sec. 11.3). The working group had expected there to be stronger connections in this regard, but in some cases the need for change documents (or parts of) apparently made little use of the information evaluated in the assessment. If, for example, a forest states a possible need to change a forest plan standard, then there should be a corresponding (and referenced) discussion of that standard in the assessment (why it was used, what impact it had, what new information or circumstance warrants a change in this standard, etc.). The two documents should be linked in a logical fashion. Otherwise, a reader is curious as to why there is a proposed need to change X or Y. Many forests do this by referencing "current forest plan direction" which is useful and will help the agency explain to the public why departures from existing plans are deemed necessary or why existing plan components are still important.

The Committee found it very useful when assessments and need-for-change documents made references to existing plans and specific plan components and monitoring results. Doing so seemed to focus attention on what purportedly works and what fails to work in existing plans and, therefore, what may remain unchanged and what needs to change as a result. A more comprehensive referencing of existing plan direction will assist readers and help structure the subsequent scoping and public participation processes.

Stronger linkages between assessments and need for change documents are also necessary in order to meet the rule's requirements to "document how best available scientific information was used to inform the assessment, the plan decision, and the monitoring program" and to "[i]dentify what information was determined to be the BASI, explain the basis for that determination, and explain how the information was applied to the issues considered" (§219.3).

The following is a good example of a forest making strong linkages between the assessments and the need-to-change documents:

- The Francis Marion National Forest's assessment included good references to the current forest plan, highlighted that the forest plan revision will update the existing forest plan and not create a new forest plan from scratch, did a nice job of referencing monitoring results for the current forest plan, and included changes/trends in tree species composition, timber inventory, age class distribution, annual timber growth, and an evaluation of forest plan harvest objectives vs. accomplishments. The Francis Marion National Forest's need for change statements all contained references to specific sections of the assessment. In particular, the assessment detailed a need for longleaf pine restoration and how the 1996 forest plan (including specific management area designations and plan components) might need to change as a result.

*2) Planning teams should view and use assessments as a crucial part of a more adaptive planning framework.*

It would be helpful for future assessments to more clearly "document information needs" (§ 219.a)(3)) and identify "key assumptions, risks, areas of uncertainty, and how the assessment can inform the development of the monitoring program" (FSH 1909.12, ch. 10, sec. 11.3). Identifying these information needs, assumptions, risks, and uncertainties will be essential to structure a more adaptive approach to planning in the future. Some forest assessments identify information needs, but only in a cursory fashion, and there is often no corresponding discussion of how these information needs could be filled and their relevance to the monitoring program. Clearly identifying information needs will be critical to the development of a more adaptive planning framework.

*3) Revision efforts should include more robust information on social, cultural, economic and historic uses – making stronger connections between human uses and ecological conditions.*

Forests should make efforts to front load information/partners early in the planning process. During the assessment phase, efforts should be made to better populate the plan with relevant information. Partners should be identified and actively invited to share

relevant information. Forests should not solely rely on those members of the public who ‘show up’ and provide information. This mode of operation most often results in ‘hit or miss’ data collection and data gaps are the result. It would also be beneficial for forests to provide a general discussion of historic and traditional uses.

Oftentimes cultural and historic resource condition reports are more focused on cultural archeology than on ethnography and anthropology of current forest communities. Although it is important to address historic uses, it is also imperative that assessments contain information on current communities and living practices and their importance to the landscape and the opportunities that exist to engage in balancing natural process and human species through management. In particular, assessments should provide information on how forest communities are impacted by current conditions and discussions on how communities will be effected by trends, stressors, future management or lack of management of ecosystem resources.

Recreation, traditional and extractive uses need to be accounted for spatially and experientially, not just programmatically. For recreational uses, forests need to orient the human uses portion of assessments around a detailed inventory of places of recreational significance, incorporating insights on quality, user experience, and seasonality. Forests should ensure that trend data is appropriately up-to-date and connected to actual Forest use and ensure that the Recreation Opportunity Spectrum (ROS) is appropriately used as shorthand for levels of development, not as a substitute for detailed information about the user experience.

The following are good examples of forests including robust information on social, cultural, economic and historic uses:

- The Sierra National Forest’s Living Assessment website contains an especially helpful on-line overview with links to chapters and topics, plus a Wiki page. The assessment also contains a good discussion about benefits to people, including vulnerability to the threat of uncharacteristic fire, funding needs, large departures from NRV, acknowledgement that the rate of restoration is much less than needed, and a discussion on potential effects on water, ecological integrity and ecosystem services. Region 5’s Sierra Nevada Bio-Regional Assessment complements the Sierra National Forest’s assessment by providing context for issues that are broader than individual national forests. (It is important to note that the Committee acknowledges that not all Forests/Regions have the resources or the need to complete a Bio-Regional Assessment.)

- The Flathead National Forest's assessment contains a good discussion about the interdependence of ecological, social, and economic factors in all phases of forest planning, plus a thorough discussion of Ecosystem Services.

4) *Planning teams must consider and adequately respond to the relevant information provided by the public during the assessment phase.*

The 2012 Rule emphasizes collaboration and stronger public participation. To foster this, it is important that forests actively engage the public and then address the input and information that the public provides, incorporating user-generated content into the assessments as much as possible and providing a clear rationale when information is not used. When the public spends significant time and resources participating in the assessment phase it is fair to expect some reflection of, or response to, that input. Public engagement in the assessment phase should build trust and encourage further participation in the process.

5) *Planning teams should focus on presentation of information to increase utility and functionality (or usability) and applicability.*

Early adopter forests have generally approached the assessment report by providing a wide variety of information on each of the 15 assessment topics. While having a lot of information in one place can be helpful, this approach has led to assessments that sometimes are unwieldy, not as strategically focused as they could be, and missing critical pieces of information necessary to inform the need for change and the plan revision. The primary value of an assessment is how it feeds into the larger planning process. As such, the usability and applicability of the assessments is important. Different approaches to achieving this objective are described below.

- One promising approach to make explicit the linkages between assessments and need for change statements is to pose and answer questions for each of the fifteen assessment topics. The Pisgah-Nantahala National Forest utilized such a Q&A approach, although the questions for some assessment topics were not sufficiently comprehensive. This approach can help identify the information necessary to evaluate the extent to which changes in plan direction are needed to satisfy the substantive provisions of the rule (36 CFR §§ 219.8-219.11). By using this approach, the Forest Service can also organize a logic model or roadmap that makes explicit linkages to not only the need for change statement and potential plan components, but also to the eventual development of monitoring plans. Done well, the Q and A approach can serve as a logic model that explicitly articulates the key linkages up front.

- Other ways to improve the assessment's utility and functionality can include utilizing executive summaries, key findings or abstracts and other methods for summarizing relevant information in an accessible manner.

The rapid identification and evaluation of relevant information during the assessment process can help set up a more participatory, adaptable and science-based plan revision. The recommendations offered herein can assist planning teams in preparing more effective and efficient assessments that serve as an important first phase of a three part adaptive planning process.

Respectfully submitted on behalf of the National Advisory Committee,



Susan Jane Brown  
Co-Chair



Rodney Stokes  
Co-Chair

Attachments:

APPENDIX 1- Evaluative Questions and Criteria Form

<b>Reviewer:</b>	<b>National Forest:</b>
<b>Common &amp; Contextual Understanding</b>	<b>Reviewer Comments:</b>
<ul style="list-style-type: none"> <li>Does the assessment help build a common and contextual understanding of conditions, trends and information that is relevant to plan development, revision, or amendment?</li> </ul>	
<ul style="list-style-type: none"> <li>Was the information usefully presented, synthesized, narrated, etc.?</li> </ul>	
<ul style="list-style-type: none"> <li>Does the assessment situate a plan area in its broader landscape (i.e., distinctive roles and contributions)?</li> </ul>	
<ul style="list-style-type: none"> <li>What is the scope of information considered in the assessment (e.g., does it come from a broad base of information and research internal and external to the USFS)?</li> </ul>	
<ul style="list-style-type: none"> <li>Was the assessment completed in a 'rapid' fashion (i.e. how long did the assessment take)?</li> </ul>	
<ul style="list-style-type: none"> <li>Additional Comments/Observations:</li> </ul>	
<b>Best Available Scientific Information</b>	
<ul style="list-style-type: none"> <li>Does the assessment document and explain how the best available scientific information was used to inform the assessment and applied to the issues considered?</li> </ul>	
<ul style="list-style-type: none"> <li>Does the assessment evaluate the integrity of current conditions, identifying areas that may require restoration?</li> <li>How was NRV assessed and presented in the assessment? If NRV was not used to evaluate ecological integrity, what alternative approach was used?</li> </ul>	
<ul style="list-style-type: none"> <li>Additional Comments/Observations:</li> </ul>	
<b>Adaptive planning</b>	

<ul style="list-style-type: none"> <li>Does the assessment facilitate a more adaptive approach to planning?</li> </ul>	
<ul style="list-style-type: none"> <li>Does the assessment identify information gaps that could be filled through inventories, plan monitoring, or research?</li> </ul>	
<ul style="list-style-type: none"> <li>Are assessments naming assumptions?</li> </ul>	
<ul style="list-style-type: none"> <li>Are forests identifying areas for potential monitoring during the assessment phase?</li> </ul>	
<ul style="list-style-type: none"> <li>Does the assessment identify areas of uncertainty that are relevant to the development of plan components?</li> </ul>	
<ul style="list-style-type: none"> <li>Additional Comments/Observations:</li> </ul>	
<p><b>Need for Change and Plan Components</b></p> <ul style="list-style-type: none"> <li>Are there linkages (rational connections) between the assessment and the agency's decision that there is a need to change the existing plan?</li> </ul>	
<ul style="list-style-type: none"> <li>Are there linkages (rational connections) between the assessment and the development of plan components?</li> </ul>	
<ul style="list-style-type: none"> <li>Additional Comments/Observations:</li> </ul>	
<p><b>Public Participation</b></p> <ul style="list-style-type: none"> <li>Was the public (including tribes and other agencies/governments) informed of and invited to provide information for the assessment early in the process?</li> </ul>	



<ul style="list-style-type: none"> <li>Was a draft assessment made available for public comment, and were public comments incorporated into the final assessment?</li> </ul>	
<ul style="list-style-type: none"> <li>Additional Comments/Observations:</li> </ul>	

**Relevant language from regulations**

**Common & Contextual Understanding**

§219.19 Definitions. Assessment. For the purposes of this subpart, an assessment is the identification and evaluation of existing information to support land management planning. Assessments are not decision-making documents, but provide current information on select topics relevant to the plan area, in the context of the broader landscape.

§219.6 Assessment. The responsible official has the discretion to determine the scope, scale, and timing of an assessment described in §219.5(a)(1), subject to the requirements of this section. (a) Process for plan development or revision assessments. An assessment must be completed for the development of a new plan or for a plan revision. The responsible official shall:

(1) Identify and consider relevant existing information contained in governmental or non-governmental assessments, plans, monitoring reports, studies, and other sources of relevant information. Such sources of information may include State forest assessments and strategies, the Resources Planning Act assessment, ecoregional assessments, non- governmental reports, State comprehensive outdoor recreation plans, community wildfire protection plans, public transportation plans, State wildlife data and action plans, and relevant Agency or interagency reports, resource plans or assessments. Relevant private information, including relevant land management plans and local knowledge, will be considered if publicly available or voluntarily provided.

(2) Coordinate with or provide opportunities for the regional forester, agency staff from State and Private Forestry and Research and Development, federally recognized Indian Tribes and Alaska Native Corporations, other governmental and non-governmental parties, and the public to provide existing information for the assessment.

(3) Document the assessment in a report available to the public. The report should document information needs relevant to the topics of paragraph (b) of this section. Document in the report how the best available scientific information was used to inform the assessment (§219.3). Include the report in the planning record (§219.14). (b) Content of the assessment for plan development or revision. In the assessment for plan development or revision, the responsible official shall identify and evaluate existing information relevant to the plan area for the following:

- (1) Terrestrial ecosystems, aquatic ecosystems, and watersheds;
- (2) Air, soil, and water resources and quality;
- (3) System drivers, including dominant ecological processes, disturbance regimes, and stressors, such as natural succession, wildland fire, invasive species, and climate change; and the ability of terrestrial and aquatic ecosystems on the plan area to adapt to change;

- (4) Baseline assessment of carbon stocks;
- (5) Threatened, endangered, proposed and candidate species, and potential species of conservation concern present in the plan area;
- (6) Social, cultural, and economic conditions;
- (7) Benefits people obtain from the NFS planning area (ecosystem services);
- (8) Multiple uses and their contributions to local, regional, and national economies;
- (9) Recreation settings, opportunities and access, and scenic character;
- (10) Renewable and nonrenewable energy and mineral resources;
- (11) Infrastructure, such as recreational facilities and transportation and utility corridors;
- (12) Areas of tribal importance;
- (13) Cultural and historic resources and uses;
- (14) Land status and ownership, use, and access patterns; and
- (15) Existing designated areas located in the plan area including wilderness and wild and scenic rivers and potential need and opportunity for additional designated areas.

Draft Directives: FS1909.12 (11) Assessment. Assessments rapidly evaluate existing information about relevant ecological, economic, and social conditions, trends, and sustainability and their relationship to the land management plan within the context of the broader landscape. The responsible official shall consider and evaluate existing and possible future conditions and trends of the plan area, and assess the sustainability of social, economic, and ecological systems within the plan area, in the context of the broader landscape (§ 219.6). (36 CFR 219.5(a))

Draft Directives: FS1909.12 (11) The term “relevant” means the information must pertain to the topics under consideration at spatial and temporal scales appropriate to the plan area and to a land management plan. Relevance in the assessment phase is information that is relevant to the conditions and trends of the 15 topics in 36 CFR 219(b) or to the sustainability of social, economic, or ecological systems. If no relevant available information exists for the topic areas described in 36 CFR 219.6(b), or if there are gaps in existing, available information, there is no requirement to begin new studies to acquire or develop such information.

Draft Directives: FS1909.12 (11) The term “available” means that the information is currently available in a form useful for the planning process without further data collection, modification, or validation. The assessment report should identify information gaps, which the responsible official could fill in through inventories, plan monitoring, or research.

“The intent is for the RO to develop in the assessment phase a clear understanding of what is known about the plan area, in the context of the broader landscape, in order to provide a solid context for decision-making required during the planning phase.” 77 Fed. Reg. 21, 201.

“A plan reflects the unit's expected distinctive roles and contributions to the local area, region, and Nation, and the roles for which the plan area is best suited, considering the Agency's mission, the unit's unique capabilities, and the resources and management of other lands in the vicinity.” 36 CFR 219.2

“Nothing in this section should be read to indicate that the responsible official will seek to direct or control management of lands outside of the plan area, nor will the responsible official conform management to meet non-Forest Service objectives or policies.” 36 CFR 219.4

“Identify and consider relevant existing information in governmental or non-governmental assessments, plans, monitoring reports, studies, and other sources of relevant information. Such sources of information may include State forest assessments and strategies, the Resources Planning Act assessment, ecoregional assessments, non-governmental reports, State comprehensive outdoor recreation plans, community wildfire protection plans, public transportation plans, State wildlife data and action plans, and relevant Agency or interagency reports, resource plans or assessments. Relevant private information, including relevant land management plans and local knowledge, will be considered if publicly available or voluntarily provided.” 36 CFR 219.6

### Best Available Scientific Information

§ 219.3 Role of science in planning. The responsible official shall use the best available scientific information to inform the planning process required by this subpart. In doing so, the responsible official shall determine what information is the most accurate, reliable, and relevant to the issues being considered. The responsible official shall document how the best available scientific information was used to inform the assessment, the plan decision, and the monitoring program as required in §§ 219.6(a)(3) and 219.14(a)(4). Such documentation must: Identify what information was determined to be the best available scientific information, explain the basis for that determination, and explain how the information was applied to the issues considered.”

Draft Directives: FS1909.12 (12.15a): The NRV is an analysis tool for assessing the ecological integrity of selected key ecosystem characteristics (FSH 1909.12, zero code, sec. 05 defines NRV). The NRV represents the distribution of conditions under which ecosystems developed. In this Handbook, the NRV approach is a tool for assessing ecological integrity and does not constitute a management target or desired condition. The NRV approach gives context for evaluating the integrity of current conditions, and identifying important compositional, structural, and functional elements that may warrant restoration. The responsible official may, however, use alternatives to the NRV approach for assessing ecological integrity as described in section 12.15b.

Draft Directives: FS1909.12 (12.15a) The NRV approach gives context for evaluating the integrity of current conditions, and identifying important compositional, structural, and functional elements that may warrant restoration. The responsible official may, however, use alternatives to the NRV approach for assessing ecological integrity as described in section 12.15b.

### Adaptive Planning

§ 219.5 Planning framework. (a) Planning for a national forest, grassland, prairie, or other comparable administrative unit of the NFS is an iterative process that includes assessment (§ 219.6); developing, amending, or revising a plan (§§ 219.7 and 219.13); and monitoring (§ 219.12). These three phases of the framework are complementary and may overlap. The intent of this framework is to create a responsive planning process that informs integrated resource management and allows the Forest Service to adapt to changing conditions, including climate change, and improve management based on new information and monitoring.

(1) *Assessment.* Assessments rapidly evaluate existing information about relevant ecological, economic, and social conditions, trends, and sustainability and their relationship to the land management plan within the context of the broader landscape. The responsible official shall consider and evaluate existing and possible future conditions and trends of the plan area, and assess the sustainability of social, economic, and ecological systems within the plan area, in the context of the broader landscape (§ 219.6).

### Need for Change and Plan Components

“In developing a proposed new plan or proposed plan revision, the responsible official shall: Review relevant information from the assessment and monitoring to identify a preliminary need to change the existing plan and to inform the development of plan components and other plan content.”

“Assessments do not develop plan components, but only gather and evaluate existing information that can be used later in the development of plan components.” 77 Fed. Reg. 21,202.

§219.5(a)(2) The process for developing or revising a plan includes: Assessment, preliminary identification of the need to change the plan based on the assessment,...

### Public Participation

(§ 219.4(a)) “The RO shall provide opportunities to the public for participating in the assessment process.... [T]he RO has the discretion to determine the scope, methods, forum, and timing of those opportunities.”

Draft Directives: FS1909.12 (11) “Assessments serve several purposes: ... 2. Build a common understanding of that information with the public and other interested parties before starting plan development, plan amendment, or plan revision. 3. Develop relationships with interested parties to facilitate public and government participation among government entities, Indian Tribes, private landowners, and other partners and interested parties. 5. Develop a mutual understanding of the complex topics across landscapes that are relevant to planning on the unit.

Assessments serve several purposes: 1. Identify and evaluate a solid base of available information relevant to the plan development, plan amendment, or plan revision, including: a. Evaluate available information with the public and other interested parties relevant to the assessment requirements of 36 CFR 219.6(b); and...

“The RO should engage the public and governmental entities early to encourage participation in the assessment process. The RO should manage the process so that the assessment report is promptly available to the public.” (ibid.)

§219.4 Requirements for public participation. (a) Providing opportunities for participation. The responsible official shall provide opportunities to the public for participating in the assessment process; developing a plan proposal, including the monitoring program; commenting on the proposal and the disclosure of its environmental impacts in accompanying NEPA documents; and reviewing the results of monitoring information. When developing opportunities for public participation, the responsible official shall take into account the discrete and diverse roles, jurisdictions, responsibilities, and skills of interested and affected parties; the accessibility of the process, opportunities, and information; and the cost, time, and available staffing. The responsible official should be proactive and use contemporary tools, such as the Internet, to engage the public, and should share information in an open way with interested parties. Subject to the notification requirements in §219.16, the responsible official has the discretion to determine the scope, methods, forum, and timing of those opportunities. The Forest Service retains decision making authority and responsibility for all decisions throughout the process.

“Coordinate with or provide opportunities for the regional forester, agency staff from State and Private Forestry and Research and Development, federally recognized Indian Tribes and Alaska Native Corporations, other governmental and non-governmental parties, and the public to provide existing information for the assessment.” 36 CFR 219.6