

**Statement of**  
**CHRIS RISBRUDT**  
**DIRECTOR, ECOSYSTEM MANAGEMENT COORDINATION**  
**Forest Service**  
**United States Department of Agriculture**  
**Before the**  
**Subcommittee on Forests and Forest Health**  
**Committee on Resources**  
**United States House of Representatives**  
**April 11, 2000**  
**Concerning**  
**Oversight:**  
**GAO Report on Forest Service Planning; Better Integration of Broad**  
**Scale Assessments Into Forest Plans is Needed**

Madam Chairman and Members of the Subcommittee:

Thank you for the opportunity to discuss the February 2000, General Accounting Office Report entitled: Forest Service Planning; Better Integration of Broad Scale Assessments Into Forest Plans is Needed (GAO/RCED-00-56, February 15, 2000). My name is Chris Risbrudt, and I am Director of the Ecosystem Management Coordination Staff for the Forest Service.

The United States General Accounting Office (GAO) initiated a study, at the request of Congress, of the Forest Service's planning process in general and of broad scale ecosystem based assessments in particular. In the report, GAO discusses (1) the views of the Forest Service, other federal agencies, and GAO on the key elements that broad scale ecosystem based assessments should contain to maximize their value to the forest planning process; (2) the extent to which the Forest Service has incorporated these elements into the Great Lakes Ecological Assessment and whether it has integrated the assessment into the forest planning process; and (3) the extent to which the

Forest Service's proposed planning regulations ensure that future broad scale assessments contain these elements and are integrated into the forest planning process.

The Forest Service believes broad scale assessments provide an important fundamental source of information and data for the land management planning process. Broad scale assessments look at ecosystems and social conditions over broad, regional areas as opposed to looking at things from a forest-by-forest perspective. They can be efficient and cost-effective, and proving to be a valuable tool for improving land management. This is evidenced by the number of broad scale assessments that have been undertaken in the past, such as the Northwest Forest Plan effort, the Interior Columbia Basin Ecosystem Management Project, the Sierra Nevada Framework, the Southern Appalachian Assessment, and the Great Lakes Ecological Assessment, to name a few.

The GAO makes a number of recommendations to the Secretary of Agriculture regarding the Great Lakes Ecological Assessment and the forest planning process for the Lake States. GAO also makes recommendations regarding the revision of the forest planning regulations as it relates to broad scale ecosystem based assessments.

The Forest Service Statement of Action responding to the final GAO report has not been completed yet. While our final response is still being formulated, we can speak in terms of our response to the draft report. We agreed with many aspects of the draft GAO report, but we disagreed with the recommendation that we need a new strategy that would allow the Great Lakes Ecological Assessment team to complete their work before plan revision activities continue. The forest plans for the lake state forests are approaching or already exceed their 15 year life expectancy, and are in need of revision. Therefore, the revision process should move forward using the best available information in order to comply with statutory requirements for plan revisions.

### **GAO Recommendations Regarding The Great Lakes Ecological Assessment**

The ongoing Great Lakes Ecological Assessment has many long-term objectives pertaining to data assemblage and analysis. The effort has provided a number of short-term benefits to the Lake State forests in support of forest planning and revision efforts. The assessment has gathered an

extensive amount of data that is newly available to the forests in their planning efforts. The data has been collected at an appropriate scale to ensure that important issues facing the region are adequately addressed. While the Great Lakes Assessment will not provide all the data needed for the upcoming revision effort, some adaptations have been made to the assessment process as we have learned more about the forest planning issues we will have to address during the plan revisions.

An important point I would like to make is that broad-based ecosystem assessments such as the Great Lakes Ecosystem Assessment are not an exclusive approach to compiling the necessary information for planning purposes. However, in the case of the Lake States forest planning efforts, the forests have access to other sources of data and information that support the planning effort that are not the product of the Great Lakes Ecological Assessment.

In response to the draft GAO report's recommendations, we stated that the Great Lakes Ecological Assessment should be funded in a similar manner to other broad scale assessment efforts. These efforts prioritized funding within the programmed budget for the Region, rather than receiving special project funding. Also, in terms of a strategy for completing the Great Lakes Ecological Assessment, our current short-term priorities for issues and data to support the forest plan revision efforts are:

- Range of natural variability within certain ecological provinces
- Historic role of various natural disturbance events
- Identification of high ecological areas

Other short-term priorities are the identification of social value areas and social and economic trends and historic role of National Forests in the area. The forests have identified these as needs, and are putting together a strategy to deal with them by looking at both internal and external sources for funding and accomplishment.

### **GAO Recommendation Regarding Proposed Planning Regulations**

We are currently reviewing public comments on the proposed planning regulations, and if appropriate, we will revise the regulation. We are preparing final text for the regulations, and we anticipate publishing the final rule in the summer of 2000. We are also revising agency directives to further clarify Agency policy and procedural guidance for conducting

planning pursuant to the regulations. The draft directives will be available for public review and comment in the near future. We will consider GAO's recommendations as we complete the final rule and draft the directives.

As stated in our response to the draft GAO report, we intend to include direction for information development for planning, which includes a strategy for broad scale assessments, in our Forest Service directives system. The GAO recommendations will therefore be appropriately captured in the directives. The directives describe the relationships between the Regional Offices, Forests, and Forest Service Research units in conducting assessments. They will also likely spell out the assessment process recommended by GAO, including that assessments:

- Occur early in the planning process to enable timely use of information
- Have clear objectives and identifiable products
- Are conducted at appropriate geographic scales
- Include information assemblage, analysis, and conclusions related to issues
- Are open to all interested parties and make data and findings available in a way the public can understand
- Include cost and time estimates for consideration by Forest Service officials

In the proposed planning rule as published in the Federal Register, the official responsible for making a plan decision has the discretion to determine whether an issue raised by the public, raised as a result of monitoring results, or because of new information is appropriate for further consideration. If an issue is appropriate for further consideration, the responsible official should review available information and determine if additional information is desirable and can be obtained at a reasonable cost and in a timely manner. The responsible official may develop or supplement either a broad scale assessment or local analysis, depending on the scale of the issue. The responsible official has the discretion to choose the method and determine the scope of the collection of new information. Depending on the scale of the issue at hand, a forest supervisor will typically be the responsible official for a plan amendment or revision. However, Regional Foresters are responsible for national forest's participation in broad scale assessments.

The findings of the assessments are used to characterize current conditions and to help make informed decisions about management activities, such as resource protection and watershed restoration, and will be readily available to the public.

**Summary**

In conclusion, the Forest Service will prepare a Statement of Action for the GAO report, and consider GAO's recommendations as we revise and finalize the proposed planning rule and draft revised planning regulations. Together the proposed planning rule and directives will address GAO's concerns regarding this issue. We believe the Great Lakes Ecological Assessment is serving its intended purpose and has in fact been a model of adaptive management as our thinking and understanding on the use and role of broad scale ecological assessments has evolved over time.

This concludes my written statement. I would be happy to answer any questions you or members of the Subcommittee might have at this time.