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## **UPDATE ON RECREATION SITE FACILITY MASTER PLANNING**

### ***Public Participation Review Report Confirms Lack of Public Input Into The Planned Closure of Thousands of Recreation Sites.***

#### **Policy Continues Without Public Participation**

Implementation of the Forest Service Policy called Recreation Site Facility Management Planning or RS-FMP, continues unabated without meaningful public participation and despite promises by top Forest Service officials that no further decisions would be made without fully involving the public.

RS-FMP has raised concern in communities adjacent to or surrounded by National Forests because it threatens to close, decommission, or otherwise remove from the developed recreation program between 3,000 and 5,000 recreation sites, reduce seasons at thousands more, and implement new and increased fees at campgrounds, picnic areas, boat launches, swimming sites, and trailheads. Critics, including the Western Slope No Fee Coalition, have charged that RS-FMP is being implemented without considering public input.

Following a flurry of negative media stories in late 2006, retiring Forest Service Chief Dale Bosworth, in one of his last official acts, appointed a National Review Team to look into whether public involvement in RS-FMP was adequate. He required them to submit their report by April 1, 2007.

The Review Team completed their report, entitled *RS-FMP Public Participation Review Report*, on time, and submitted it to new Forest Service Chief Abigail Kimbell and Deputy Chief Joel Holtrop, but it was not released to the public until May 24. By delaying the release, the Forest Service withheld from the public, for seven weeks, a report about inadequate public involvement in a policy that deeply affects public lands.

In his press release announcing the appointment of the Review Team, Chief Bosworth said,

“During the Review Team’s examination of public involvement, national forests will not make any decisions based on the Recreation Site Facility Master Planning analysis.”

Although decisions were not announced during the review period, the RS-FMP process, which is *inherently* a decision-making process, continued, and on dozens of forests the decisions had already been made anyway. Those decisions are now being executed with

shallow and disjointed public participation, and the outcome has long been a foregone conclusion. RS-FMP has resumed business as usual without regard to the findings of the report.

The report fails to address fundamental issues raised by the WSNFC and others. The report does nothing to change the fact that RS-FMP will result in a huge loss of recreational facilities, will aggravate the trend toward fee-based funding that is making public lands increasingly unaffordable to ordinary Americans, and will contribute to the creeping commercialization/privatization of public lands.

### **RS-FMP Background**

RS-FMP mandates that every National Forest inventory all its developed recreation sites and compare their facilities to a National Required Standard, which Regions can modify to a limited extent. The National Required Standard was created by taking a poll of Forest Service managers. No public input was sought. Many simple recreation sites do not meet the standards. The RS-FMP Process Guidebook is blunt:

“If a site cannot be operated to at least meet the regionally required standards, it must be closed.”

Each Forest is mandated to produce an RS-FMP 5-year Proposed Program of Work (PPOW) listing management actions planned for each recreation site. In at least one Forest, 72% of recreation sites are slated for closure. While dozens of the PPOWs are known to be complete and some Forests have begun implementation by removing site facilities, only eight Plans have been released to the public to date.

RS-FMP dictates that all recreation sites must become financially sustainable (spelled “Sustainable” in the RS-FMP logo) and have a marketable “niche.” Based on the 5-year Plans obtained to date by the WSNFC, the principal ways that sustainability is to be achieved are by closing/decommissioning lesser-used sites, removing facilities such as toilets and picnic tables, and by charging or increasing fees at the sites that remain.

### **Public Still Excluded From Site Closure Decisions**

The *RS-FMP Public Participation Review Report* found that “There was no deliberate attempt to exclude public participation in RS-FMP or any attempt to conceal it from the public,” but admits, “direct public involvement was not required prior to the fall of 2006.” It says that forest officials simply saw no need to include the public as they were ranking recreation sites against an internally created standard and closing down those that don’t fit.

“Not excluding” the public is not the same thing as *including* the public, and “making no attempt to conceal” a policy from the public is not the same as *informing* them. The Report says that RS-FMP was seen as a totally internal process, despite the fact that it is being used to decide the fate of thousands of publicly owned recreation facilities.

The Review Team was heavily weighted toward individuals who are supporters of public land user fees, including Forest Service staffers who are heavily invested in the fee concept.

- Team leader Beth Pendleton is from the Pacific Southwest Region, where an “Adventure Pass” has been required for over ten years for almost all recreation in

four national forests encompassing over 3.5 million acres. The Adventure Pass program was one of the first fee programs under Fee Demo. It imposed an entrance fee for any recreational use of the Los Padres, Angeles, Cleveland, and San Bernardino National Forests. Under the prohibition against Forest Service entrance fees specified in the Federal Lands Recreation Enhancement Act (Fee Demo's successor law), almost all of those forests' recreation sites continue to require the Adventure Pass under the guise of being High Impact Recreation Areas. HIRA is an internal Forest Service designation which is not authorized anywhere in the law.

- Another team member was the Supervisor of the Medicine Bow-Routt National Forest, whose PPOW has still not been released to the public or been subjected to any public input, even though eleven sites were closed in 2006 without any public involvement or NEPA analysis, and 38 of 132 recreation sites are ultimately slated to be closed, decommissioned, or otherwise removed from the developed recreation program. The Medicine Bow-Routt's 5-Year Plan, obtained through unofficial channels by the WSNFC, also calls for new or increased fees at 32 sites, for reduced seasons and/or fewer services at 66 sites, and for 12 sites to be transferred to private concessionaire or volunteer management. All of these decisions were made without any public input, and they were already made before Chief Bosworth appointed Medicine Bow-Routt Supervisor Mary Peterson to the Review Team.

Throughout 2006, efforts to obtain RS-FMP plans from forests that were known to have completed them were met either with claims that they did not exist or refusal to release them. Only when a handful of plans were obtained through unofficial sources and some site closures started to occur and met public opposition did the Forest Service begin to release a few RS-FMP plans.

### **Forest Site Closure Plans Still Under Wraps**

One of the "Key Recommendations" in the Review Team's Report is that all forests that have completed their RS-FMP "Proposed Plan of Work" should "share those plans with the public and invite public participation in proposed actions." The report contains a chart showing that 41 forest units have completed their Plan of Work, but only eight of those have been posted on the forest's website in the almost three months since the Report was submitted.

- The eight forests that have released their completed RS-FMP 5-year Plan are the Malheur, Deschutes, Lolo, Bitterroot, Sequoia, Flathead, Helena, and Mendocino.
- The Wallowa-Whitman and Willamette National Forests have released summaries of their Plans but not the complete document.
- Plans that are shown on the report's chart as complete but have not been publicly released are the Bridger-Teton, Fremont-Winema, Colville, Dixie, Chugach, White River, Ashley, Coronado, Umpqua, Tongass, Shoshone, Medicine Bow-Routt, Sawtooth, San Juan, Apache-Sitgreaves, Fishlake, Wasatch-Cache, Salmon-Challis, Caribou-Targhee, Land Between The Lakes, Stanislaus, Boise,

Angeles, Lewis & Clark, Payette, Nebraska, Rogue-Siskiyou, Carson, Uinta, Custer, and San Bernardino National Forests.

The WSNFC has been able to obtain the complete plans for the Medicine Bow-Routt, Colville, Umpqua, Wallowa-Whitman, Willamette, and Tongass National Forests, and partial information about the plan for the Grand Mesa-Uncompahgre-Gunnison (GMUG) National Forest. The fifteen plans or partial plans obtained to date encompass over 1,900 recreation sites and show that the Forest Service intends to remove 380 of them, or 20%, from the developed recreation program, reduce capacity at another 20%, remove amenities such as toilets, picnic tables, fire rings, and drinking water systems at 276 sites (15% of the total), and add or increase fees at 272 sites (14%).

Imbedded in the Review Team's report is evidence that the practice of not releasing RS-FMP plans to the public continues unabated:

- The Dixie National Forest was one of four forests visited in person by the Review Team. It was chosen because it was "one of four pilot RS-FMP forests that did not have extensive public involvement and has only recently begun implementation of its 5-year RS-FMP program of work with some public participation." Yet even though they were a "*pilot forest*" and have "*begun implementation*," the Dixie's RS-FMP Plan has still not been released to the public.
- The Review Team also visited the Santa Fe National Forest because it is "near the end of its RS-FMP process" and is "taking its draft 5-year RS-FMP program of work to the public for review and input prior to finalization." Yet the chart in the report shows the Santa Fe to be only at the mid-point in their RS-FMP process and to not yet even have a completed 5-year Plan. If the Santa Fe has a completed 5-year Plan, it has not been publicly released.
- The Superior National Forest was the third site visited by the Review Team. It was chosen because it is "at the mid-point of its RS-FMP process with substantial public involvement." However, on the chart the Superior is shown as having not yet begun their RS-FMP process, and there is nothing about RS-FMP on their website.
- The Mt Hood National Forest was the fourth forest visited by the Review Team. Mt Hood has conducted public participation in the form of two public "workshops" and an on-line survey. The public was invited to communicate which sites on the forest are most valuable to them by essentially "voting" for their favorite sites. At no time were they told that the sites that get the most "votes" will be kept open but will probably see new or increased fees, while the ones with less votes will probably go away. The overall objective of RS-FMP (to make sites financially self-sustainable or close them) was not made explicit and was not open to discussion.

Even those few forests that have posted their Plan of Work have not invited public participation in any meaningful way. Efforts to include the public have been shallow and disjointed, including public meetings announced less than a day in advance and press releases calling vaguely for public participation but giving no specifics.

- The Mendocino National Forest put out a press release on January 31, 2007 inviting the “interested public” to “participate in an evaluation” of their recreation sites. No public meetings were scheduled, no specific proposed actions were announced, and their Plan of Work was not provided for public review. Then in a subsequent press release dated April 30, 2007, the Mendocino announced that their site review was complete, published their Plan of Work (dated January), and revealed that major management changes are planned at 30 of their 64 developed sites. Those changes include the complete obliteration of two campgrounds, the implementation of new fees at 15 sites, and increased fees at 13 sites.
- Sequoia National Forest Supervisor Arthur Gaffrey approved the Sequoia’s PPOW on April 24, 2006, but did not reveal its existence or offer the public an opportunity to comment on it until March 1, 2007, when they issued a vaguely worded press release asking for comments by April 15, 2007. No public meetings were conducted. The Sequoia plan calls for closing or decommissioning 58 of their 121 recreation sites, removing amenities such as toilets and picnic tables from another 65 sites, closing 42 drinking water systems, and turning 13 sites over to private concessionaires or volunteer groups to operate.

### **No Public Participation Under NEPA**

Another finding by the Review Team was that “Activities in a National Forest’s 5-year proposed program of work which involve removing or expanding facilities require adherence to the National Environmental Policy Act (NEPA).” In fact, facilities already were being removed in 2006, before public concern about RS-FMP became widespread, without any NEPA notification. Picnic tables, fire rings, toilets, and water systems, as well as some entire campgrounds, are known to have been removed at more than a dozen sites on the Grand Mesa-Uncompahgre-Gunnison, White River, and Medicine Bow-Routt National Forests, without any NEPA process.

### **Fee Proliferation**

A basic premise of the Review Team’s report is that the Forest Service’s attempt to use “business-like methods” has been misunderstood as being an expectation of profitability. The report says the process was too technical and used too much jargon for the public to understand it. But there is no misunderstanding. The RS-FMP reports obtained to date, as well as statements by agency spokespersons, confirm that only financially self-supporting sites will be retained. One Forest Service recreation manager was quoted in the press as saying

“We are being told that our developed sites must pay for themselves or we are going to get rid of them.”

For those sites that cannot generate revenue directly through fees or by being transferred to concessionaire management, the Forest Service is seeking “partners” — volunteers, non-profit groups, or local government agencies — and making it clear that if no partner can be found the site will be closed. Among the forests whose 5-year Plans have been obtained, 193 sites, or about 15%, fall into this category. If no partner can be found, these sites will be added to those scheduled for closure/decommissioning or removal of facilities. These local governments and non-profits are being pressured into “adopting”

sites and using their own funds to operate them, allowing the Forest Service to divert federal funding for other purposes.

The Review Team’s report also states that since December, 2004,  
“the Forest Service has implemented less than 15 recreation fee increases throughout the Agency.”

That statement ignores the facts that at least 118 *new* fees (as opposed to *increases*) have been implemented during that period, that concessionaires have been allowed to raise fees or implement new fees at hundreds of sites, and that the 5-year Plans obtained to date show new fees or fee increases slated for 15% of all recreation sites. There have already been at least 50 new fees or fee increases on the Tonto National Forest alone.

The report also failed to address the significant effect that fee proliferation is having on visitation. Two surveys, five years apart and on opposite ends of the country, looked at the impact of recreation fees upon visitation at federally managed public lands as well as State Parks, and both came to the almost identical conclusion that fees reduce visitation by about a third among all users and by almost half among low-income users, as shown in the following chart.

Year of Study	2000	2005
Study performed by	Dr. Thomas More US Forest Service Northeast Research Center	Michael Kirshenbaum M.S. Candidate Western Washington University
Geographic Region	New Hampshire and Vermont	Western Washington State
Method	Random mail survey	Random telephone survey
Low income upper limit	\$30,000	\$35,000
Medium income upper limit	\$75,000	\$75,000
% of ALL respondents saying they now visit public lands less often because of access fees	38%	33%
% of Low Income respondents saying access fees negatively impact their use of public lands	49%	46%

The Review Team’s report says “Recreation fee authority has created higher visitor expectations.” It ignored the fact that recreation fees have displaced traditional forest users in favor of more affluent and mobile visitors and have been correlated to decreasing recreational use and visitation.

### **Review Team Report Does Not Address The Key Issues**

The Review Team’s report does not address the Western Slope No Fee Coalition’s objections to RS-FMP. Based on the 5-year Plans obtained by the WSNFC to date, the agency plans to close, decommission, or otherwise remove from the developed recreation program between 3,000 and 5,000 developed recreation sites and convert as many as

4,000 of the remaining sites to either fee-based or private for-profit operation. The RS-FMP also calls for other drastic management changes such as reduced operating seasons, turning sites over to non-profits, removal of amenities (toilets, fire rings, picnic tables), removal/elimination of drinking water systems, new fee sites, and increased fees at existing fee sites. These changes will affect campgrounds, picnic areas, boat launches, swimming sites, and trailheads. Meaningful public participation in these changes is still lacking, and the Forest Service continues to develop and implement their RS-FMP 5-year Plans without releasing them to the public.

The Review Team's statement that removal of facilities must go through NEPA is the first time that *any* aspect of RS-FMP has been acknowledged by the Forest Service to be subject to NEPA. The Western Slope No-Fee Coalition continues to call for the entire RS-FMP process to be subjected to NEPA requirements, just as Forest Management Plans and Travel Management Plans are required to be, because of its potential to alter the human condition and affect the economies of local communities.

The RS-FMP was never authorized by Congress and has never seen Congressional oversight. The policy itself, the new recreation site standards, the individual Forest 5-year Plans and specific management actions have all been developed behind closed doors. Despite legal requirements that significant management actions on public lands be subjected to public review under NEPA, the Forest Service has no plans to do so. Implementation of site closures has already begun with little or no public notice and no meaningful public review.

The WSNFC renews its call for the following three actions:

- ***Every Forest should immediately release their RS-FMP 5-Year Plan for public review and comment as specified in NEPA.*** By law, the management actions mandated by RS-FMP should go through the NEPA process and have a public comment period, but the Forest Service is implementing them simply by public "notification," often merely by posting a closure notice at the site itself. RSFMP 5-Year Plans are supposed to be approved by Forest Service headquarters in Washington DC, but some Forests have begun implementation without that approval. That is unacceptable. This major change in public land policy must not be implemented without public participation.
- ***The responsible Committees in the House and Senate should immediately hold oversight hearings to consider whether RS-FMP is in conformity with Congressional intent.*** Congress did not initiate, was not consulted about, and did not approve the RS-FMP program.
- ***A GAO audit of Forest Service recreation appropriations compared to recreation spending, for at least the past five years, should be undertaken and completed before any further implementation of RS-FMP.*** There is a huge gap between what Congress has appropriated for Forest Service recreation programs and what is actually making its way to local land managers.

**REFERENCES [Updated October 2008]**

- The WSNFC's August 2006 White Paper on RS-FMP can be read at <http://westernslopenofee.org/index2.php?newsitem=yes&newsid=38>
- The Forest Service's Public Participation Review Report can be read at <http://www.fs.fed.us/recreation/rsfmp.pdf>
- Information about the RS-FMP process, including a two-page summary and the entire 144-page RS-FMP Process Guidebook, are no longer available at the Forest Service website but can be requested from [wsnofee@gmail.com](mailto:wsnofee@gmail.com)
- Copies of the completed RS-FMP 5-Year Plans that have been obtained by the WSNFC are posted at <http://westernslopenofee.org/index2.php?newsdisplay=yes&newsid=3>
- Summary tables showing the proposed changes by Forest within Region and National totals are posted at <http://westernslopenofee.org/index2.php?newsdisplay=yes&newsid=14>