Malcolm Wiener Center for Social Policy

> *Negotiating a Vision: Principles of*
> *Comprehensive Resource Planning and*
> *A Planning Process for the White Mountain Apache Tribe*
>
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Executive Summary

The White Mountain Apache Tribe(White Mountain Apache Tribe) currently faces the decision of whether to develop a comprehensive resource plan. The issue of Integrated Resource Management Plans (IRMPs) came up a few years ago when the BIA suggested the Tribe develop one and the BIA may force the issue again. Furthermore, current complaints about resource allocation and use may become active demands for planning. Even if comprehensive multiple resource planning were not a hot-button issue, the White Mountain Apache Tribe might find planning worth considering in its own right.

The purpose of this report is to help the Tribe decide whether to plan or not. Planning has both costs and benefits, and the way in which the Tribe creates a plan affects both. This report will focus on the *process* of planning by analyzing the experience of others and developing a prototype plan for the Tribe. The report will concentrate only briefly on the intrinsic merits or risks of plans themselves; that is left to the Tribe to investigate.

Why plan?

Planning at the Fort Apache reservation can result in several benefits. Among these are:

- Economic efficiency
  Greater economic benefit can be a consequence of two characteristics of good planning: 1)careful analysis of the Tribe's competitive situation and 2) the comparison of alternative projects to maximize net benefit to the Tribe.

- Sovereignty
  Developing a plan can assert Tribal claims to resources and can be a means of influencing the BIA's policies directly or indirectly. Creating a plan that commits resources to preservation or use may also be helpful in the Tribe's dealings with others off the reservation who have an interest in how the Tribe's resources are used. Developing a plan can also cause the BIA to follow goals defined by the Tribe if the Tribe develops an Integrated Resource Management Plan(IRMP). Even without an IRMP, if the Tribe develops a plan, the BIA will likely include the goals of plan in its policy making.

- Institutional development
  Beginning the process of developing a comprehensive natural resource plan can spur the creation of new Tribal institutions and the development of existing ones. If the Tribe chooses to write a plan by itself, pressure for better resource management agencies will naturally emerge from the planning process. The Tribe has already begun working on a Tribal Department of Forestry. Developing a plan will strengthen arguments that this process be advanced rapidly and may induce work in other agencies if the Tribe finds it wants to develop self-sufficiency in other resource management areas.

- Social learning
  Producing a plan can encourage social learning if the process of understanding existing conditions and obstacles to desired conditions is public and open. Such learning can provoke changes in accepted means of fostering greater development. For example, job security in the Tribal government may emerge as a problem all factions on the reservation want to address if a common diagnosis of the obstacles to the Tribe's development emerges.

- Vision
  Since the first phase of a planning process requires articulating a destination—a way the Tribe will look after implementation—planning can be a vehicle for building agreement on what the Tribe's priorities are. Such a vision, once converted into goals and guidelines can be used by Tribal managers and directors to guide their daily decisions in a coherent fashion.

These advantages are not exhaustively articulated here nor in the main report. The Tribe's members will have to investigate, whether the benefits of planning are worth the substantial effort required to develop a natural resource plan. Nevertheless, these advantages provide a good jumping off point for a discussion of what planning entails because they balance the considerable costs involved.

What would a good plan look like?

There is an intuitive simplicity to planning that often causes people to address only the functional requirements of planning and not the strategic implications of their choices in designing a planning process. For example, choosing who will participate in the process has strategic consequences for the success of the process and the long-term sustainability of the agreements encapsulated in the plan. Therefore, the groups that assemble a planning process for the White Mountain Apache Tribe may find it useful to think seriously about what they want to accomplish before planning the process so they can design a process that will not only result in a well-written plan, but be sustainable, be economically efficient, be politically feasible or satisfy any other criteria they desire.

In collecting the wisdom of practitioners and observers, this report suggests that the stages of the process and the way in which the players are selected and organized are critical for the success of the plan. Specifically, the stages and their strategic implications include the following:

- Deciding to Begin
  This stage can be strategically useful for mobilizing political or popular commitment to planning. By making the decision to plan unanimous, by incorporating many factions into the decision or by choosing a set of goals that planning would satisfy, the people who make the decision to plan can develop a constituency that favors planning. A committed constituency could then be used as a powerful advocate for completing the plan when the negotiation of the plan becomes difficult.

- **Defining the Scope of the Plan**
  Deciding what resource issues to include in the plan affects the level of conflict likely to emerge in the process. First, managers or analysts who are included because their resources are included, will bring their personal traits and professional perspectives. These differing points of view could create conflict. Second, the broader the plan's scope, the more likely players unfamiliar with traditional conflicts among resource managers will have a moderating influence. However, the more managers unfamiliar with current resource conflicts, the more likely discussions will breakdown due to lack of shared expertise. Third, the scope of the process will determine what outside organizations will participate, and adding outside participants certainly increases the potential for conflict.

- **Articulating the Goals of the Plan**
  Choosing a collection of goals for the plan is likely to be a frustrating task, but the planners should not lose track of the strategic advantage offered by an agreed-upon set of goals. The goals will be a foundation upon which the remainder of the process will rest. The more solid the agreement and the more concrete the goals, the more useful they will be as a fallback when disagreements need to be settled.

- **Research and Analysis**
  If research and analysis are used strategically, they can be tools for generating agreement. One major obstacle to planning is the different perceptions of the Tribe's problems that players bring to the process. If research is done with education of the public and managers as a goal, it can be the basis for a shared perception of the objective reality facing the Tribe.

- **Developing and Comparing Alternatives**
  Inevitably it will be impossible to create sets of policies that satisfy the plan's goals equally well. Thus, choosing a set of alternative policies implies that some goals will receive priority over others. Giving some goals higher priority could have adverse effects for the long-term implementation of the plan if some participants feel a deal was struck to exclude them or their goals. Therefore, it is wise to determine who chooses the alternatives and how they are chosen in a way that enhances the likelihood they are implemented.

- **Implementation and Performance Review**
  The goal of a plan is change not the generation of studies. If real change is to be accomplished, the plan must be converted into implementation guidelines or operational objectives that would eventually be yardsticks for comparing performance with intentions.

It is not enough to simply develop the stages of the process; the participants need to be orchestrated in a way that contributes to the durability of the plan and its ability to generate change over the long-term. The players need to be selected; they need to be organized; and the inevitable conflict between them needs to be regulated.

- **Players in the Planning Process**
  The complexity of planning will inevitably require the participation of consultants, lawyers and perhaps the resource managers. The inclusion of each should be done with an eye for the long-term viability of the plan. First, the expertise of natural resource consultants will be needed, yet their involvement could threaten Tribal perceptions of sovereignty. Second, current litigation and the heavy burden of statutory review require the participation of Tribal legal staffs and retained lawyers, yet unchecked concern with legal strategy could detract from the strategic needs of the plan. Finally, the inclusion of resource managers is necessary because they are ultimately going to implement any plan and their experience and opinion will be important

to incorporate. Nevertheless, including them in the wrong way could needlessly take time away from their managing duties or escalate the potential for conflict.

- Organizing the Participants in the Process
  How the public, political leaders, technical experts, managers and outsiders are brought together has implications for the efficiency of the plan and for its success. Each of these categories of participants can specialize in certain areas yet they all need to be coordinated. For example, the public or political leaders are probably best suited to making value decisions yet the experts and maybe outsiders have the relevant knowledge with which to generate policy options. Coordinating these groups and making sure they learn from each other given the distrust among them is a strategic challenge the process design will have to address.

- Regulating Conflict
  Conflict could be the centripetal force that destroys a concerted process. The threat of conflict could also cause the planning groups to avoid difficult issues or otherwise weaken the plan. Therefore, the planning process should carefully address how difficult work is paced and how cooperation is developed. This could be done by limiting the scope of the plan, limiting the roles people can play, carefully choosing a facilitator or coordinator, or otherwise dividing and pacing the labor.

A Prototype of a Phased Planning Process

This report tries to distill the more important aspects of the principles listed above into a prototype that the Tribe can employ as a focus of discussion. The prototype does not take into account all of these principles nor is it necessarily compatible with Tribal culture or politics. It does, however, incorporate some of the major issues raised here. As the Tribe begins to develop its plan, it is encouraged to address not only the mechanical parts of the planning process but the strategic implications of each decision for the plan's ability to improve life on the reservation and the plan's long-term viability.

The core of the process is a set of four stages each consisting of two major tasks: 1)Deciding to plan and creating a planning process, 2)Evaluating the present and choosing a future, 3)Generating a set of alternatives and choosing from alternatives from it and 4)Putting the plan to work and reviewing its outcomes. [Figure 3 in Appendix A, which is repeated after this summary for convenience, illustrates the four phases and the specific work in each.] In the first phase the Tribal leadership would investigate the potential costs and benefits of planning, decide whether or not to plan, and if so, designate a task force to develop the planning process fully and coordinate planning once it began. In the second phase the task force would preside over the development of a plan scope, collect opinions about goals for the plan and create interdisciplinary technical teams that would evaluate past and present uses and conditions of resources. In the third phase, the task force would coordinate the creation of alternatives for each resource and present

the alternatives to the public and/or the Council for review and approval. In the final stage, the task force would create a review board to oversee the plan's implementation and would disband itself. The review board would continue in existence for the duration of the plan, periodically comparing outcomes of the plan with intentions. (A more detailed discussion of each of these phases is in Figure 3 and in part three of the text.)

The Task Force would coordinate all the players while ultimately reporting to the Council. It would consist of four or five full-time staff members, and its sole purpose would be to develop the plan. It would integrate information from the technical teams and from the department directors and enterprise managers, political mandates from the Council and the public and specialized expertise from the legal staffs, consultants and others. One possible organizational relation looks like this:

A Prototype of Institutional Relations in the Planning Process of the White Mountain Apache Tribe
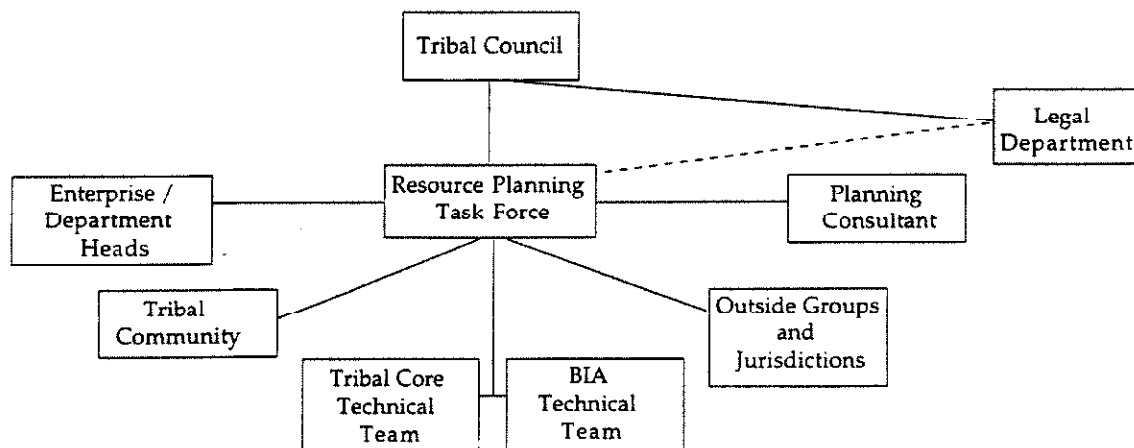
Figure 4

The enterprise and department directors would contribute a small fraction of their time to working on the plan and would primarily develop alternative resource policies. The Tribal community might participate indirectly through representatives or directly through public hearings. The technical teams would be responsible for the scientific and economic information about past, current and possible future uses of natural resources. Outside groups or jurisdictions like the neighboring forests and counties might contribute information about their management plans or otherwise aid the process. The planning consultant would

primarily offer advice on how the logistical and technical questions should be resolved and perhaps serve as a facilitator. The legal staffs could advise the task force on matters of litigation strategy or statutory compliance.

The model presented here is only one of many possible conceptions of what an effective planning process is. Hopefully, this report will spark some discussion on the reservation about what appropriate planning measures might be like or how they should be produced. If such a discussion matures into a decision to embark on a planning process, this report may help the Tribe design a process that not only makes a strong plan but engenders other benefits. If this report encourages the Tribe to think not just about the plan itself, but of the strategic elements of all the choices made in designing a process and a plan, the report will have been a success.

A Prototype for a Phased Planning Process for the
White Mountain Apache Tribe

Phase 1	Phase 2	Phase 3	Phase 4
Deciding to Plan and Creating a Planning Process	**Evaluating the Present and Choosing a Future**	**Generating Alternatives and Choosing Among Them**	**Putting the Plan to Work and Reviewing its Outcomes**
Review of planning principles and discussion of merits of planning by Council, Directors and Managers	Draft of scope of issues to be included by Council and Task Force with Legal Department	Proposal and analysis of policy alternatives to accomplish goals by Technical Teams, Enterprise Managers and Department Directors	Creation of Comprehensive Plan Review Board to oversee implementation of plan by resource managers and users by Task Force
Formation of Planning Task Force by Council, Directors and Managers	Creation of Tribal and BIA Technical Teams by Task Force	Circulation of written alternatives to Council, associations and public for discussion	Disbanding of Task Force & Technical Teams
Assessment of Tribal institutions needed for planning and definition of plan process, time frame, planning participants and roles, staffing and budgeting needs, sources of funding, plan's relation to existing plans and Memorandum of Understanding with BIA by Task Force	Development of additional Tribal institutions by Council and Task Force	Hearing of public comments on alternatives' ability to meet goals and alternatives' economic, social, cultural and environmental impacts	Creation of implementation guidelines and format of management plans to be given to BIA, Enterprises, Department Managers by Review Board
	Assessment of data needs and current conditions by Technical Teams	Revision of existing and proposed plans by Technical Teams	Review of plan accomplishments and comparison with plan goals by Tribal Council and Review Board
	Hearing of public opinions about issues and goals for the plan in the four districts by Task Force	Review of statutory compliance by Task Force and Legal Staff	
Review and approval of planning process, institutional design, funding and MOU by Tribal Council	Writing of final report evaluating existing conditions and outlining goals by Task Force and Technical Teams	Council selection and approval of final list of policies in a final draft of the plan	

Figure 3

As the White Mountain Apache Tribe looks to the twenty-first century it faces considerable challenges and opportunities. Demands on the Tribal government and the Tribe's natural resources are likely to increase. Claims on Tribal resources from within the Tribe will certainly rise dramatically. The Tribe's population of 13,000 is growing rapidly, and new generations of Apaches will look first to the Tribe to provide the resources and enterprises on which their jobs, incomes and social services will depend. Claims on Tribal resources from beyond the reservation will also grow rapidly. The Tribe faces rising burdens from the federal government in the form of detailed statutory obligations. The Tribe is also likely to face growing demands for recreation and natural resources from the Phoenix metropolitan area. Of Arizona's 3.7 million inhabitants, 44% live in the Salt River Valley communities and the state's population is predicted to grow at 2.8% annually until the end of the century. (Tecle & Covington,14)[1] These demands on Tribal assets from within and without raise the question of planning for the future. Is it wise for the Tribe to dedicate the substantial time, energy and money required to embark on an integrated plan for the future preservation and use of its resources? Is it wise for the Tribe to continue managing its resources as it now does, or would the Tribe be better off integrating its resource management decisions more fully and allocating resources in accord with articulated visions and goals?

The purpose of this report is to aid the Tribal government and its people in answering this question. There are advantages and disadvantages to creating a comprehensive resource plan, and there are variety of ways that the Tribe could develop a plan. This paper will not focus intently on the advantages or disadvantages; those are probably best left to the Tribe. Instead the report will explore the characteristics of effective planning processes. By applying accepted and tested principles in designing a prototype for the White Mountain Apache Tribe, this report will hopefully aid the Tribe in making its decision of whether to plan or not.

The discussion that follows is divided into three main parts. Part I sketches a few of the benefits the Tribe can expect from planning. Part II outlines principles of development planning collected from the experience of the Confederated Salish & Kootenai Tribes, the literature of public management theory and integrated development planning and the recommendations of the BIA for Integrated Resource Management

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[1]For comparison, the U.S. population compounded growth per annum was 1.1% from 1960 to 1988. (Ibid., p.14)

Plans (IRMPs).[2] Part III lays out a prototype of a planning process for the White Mountain Apache Tribe and sketches out some of the institutional and staff requirements of the proposed planning process. Part IV concludes the report with some observations about the prototype and the Tribe's situation.

I. Why plan?

Obviously, there are numerous benefits that could accrue to the Tribe were it to develop and follow a carefully designed plan.[3] Most salient among these benefits are increased economic efficiency, greater Tribal sovereignty and institutional capacity.[4] Developing and implementing a comprehensive long-range resource plan can make land and resource allocations more complementary thereby increasing their long-term effectiveness in accomplishing Tribal goals. Planning can also send a signal to the BIA and entities off the reservation that the Tribe has serious and articulated goals for its resource development. The development and implementation of a resource plan can also provide an opportunity for the Tribe to develop its institutions to the point where they can take over the BIA's functions. Most importantly, the planning process can cause the Tribe to face and address current internal obstacles to its long-term development.

Economic Efficiency

A well-designed plan can improve the likelihood of increased economic efficiency. First, if the planning process involves an assessment of the Tribe's competitive position, it could ultimately improve the profitability of firms on the reservation. Careful analysis of the firm's competitors, suppliers, buyers and internal resources could lead the Tribe to make strategic planning decisions for the enterprises. If these

[2] I choose the Salish and Kootenai Tribes as an example because their model is highly regarded in Indian country. Other tribes have developed plans but I have not included them here. Many of them pale in comparison with the Flathead example. Some follow the BIA's model directly and do not go much beyond IRMP guidelines. Others fail to integrate planning or to outline implementation guidelines. Still others are only in the early phases.
[3] I include this discussion of the benefits of comprehensive resource planning not so much to convince the Tribe to develop a plan as to provide a counterbalance to the discussion that follows. Enumerating the benefits above provides a way to sweeten the picture presented in Part III—the task of developing a planning process will certainly be contentious, time-consuming, costly and frustrating. Without presenting a brief sketch of the benefits the Tribe should consider, this report might convince the readers not to embark upon the planning process—*not* the purpose of this report.
[4] This report takes institutional capacity to mean the ability of an organization (e.g. the Tribal government) to do specialized work (e.g. analysis of resource conditions and generation of policy options).

decisions were made together the Tribe could diversify its risk, the enterprises could more carefully differentiate their market niches and enterprise managers might have greater awareness of their strategic options. All of these could increase the net flow of revenues to the Tribe.

Second, it is likely that gains can be made by considering the set of individual resource development projects together of separately. If plans for resource use are made independently of one another it is unlikely that net benefits to the Tribe are maximized. For net benefits to be maximized, the last incremental asset (dollar, employee, etc.) added to each project must result in equal return (financial or otherwise) regardless of which project it is added to. In other words, under efficiency, the Tribe could not be made better moving money from one project to another. If Tribal funds were inefficiently allocated, assets could be moved from one project to another resulting in a net gain for the Tribe. Such inefficiency might arise if the funding decisions were made separately without comparing gains from trading investments between projects.

An example may prove helpful.[5] Suppose the Tribe wanted to maximize net income, i.e.,, benefits were measured in terms of per capita Tribal income. And, suppose that the opportunities for exploiting the timber resources of the reservation were virtually all expended. It might prove beneficial for the Tribe to invest in an area where the opportunities for economic development were relatively untapped, say in livestock management or tourism. In this example, moving capital from the timber industry to the livestock industry would certainly hurt the timber industry, but the gains to livestock would exceed the losses to timber. If, on the other hand, the Tribe's decisions were perfectly efficient (in economic terms) no such re-allocations could be made; the returns of investing one more dollar in timber production would equal the returns to investment in livestock, and no trades could be made where the benefits surpassed costs. In fact, in such a situation the costs of a re-allocation would be greater than the gains.

This economic principle is a theoretical model and not a perfect predictor of how the world behaves. Adding to this model political conflict or inflexible decisions like heavy capital expenditures makes perfect economic efficiency elusive. Nonetheless, this economic principle can inform the design of a planning process. First, it suggests that Tribal planners articulate what they consider to be benefits.

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[5]While it may bear some resemblance to Tribal conditions, the example that follows is included for the purposes of understanding and not as a recommendation.

Without establishing what the planners hope to accomplish, it will be difficult to compare projects. Second, the principle suggests that as many projects and fields of study be brought together as is practical. By including the livestock investment decision with the decision to invest in forest growth, lumber mills, camp sites, gaming resorts, ski resorts, schools and hospitals, the Tribe can determine whether tradeoffs can be made between projects that will result in net benefits. By bringing together multiple resource planning decisions, an integrated process can evaluate tradeoffs across resources that create net gains. In short, combining the decisions to invest or develop natural and other resources in a comprehensive planning process can improve the overall well-being of the Tribe.

Sovereignty and Institutional Development

A second category of intended benefits for the Tribe will be additional sovereignty and technical capacity. Developing a plan will assert Tribal claims to the resources it wants to control. The Salish and Kootenai Tribes designed their comprehensive resource plan to "enhance the Tribe's ability to exercise control and decision-making over the lands and natural resources of the Flathead Indian Reservation." The Tribes' government intended the plan to "reinforce the jurisdictional and decision-making capabilities of the Tribes on all land and natural resource matters of the Reservation." (Salish & Kootenai, 1988, 1)

These intentions were turned into a firm assertion of Salish and Kootenai control when the Tribes used provisions of the BIA's Integrated Resource Management Planning (IRMP) guidelines[6] to hold the BIA to a course charted by the Tribe. At the start of their planning process they signed a Memorandum of Understanding with the BIA that limited the role the BIA would play in the planning process. (S&K, 1988, 4) Writing a memorandum of understanding put them in control of how BIA personnel, information and analysis would be incorporated into the plan. Making a Comprehensive Resource Plan also assured the BIA followed the will of the Tribes in planning and allocating the Tribes' resources; since the IRMP is a management agreement between the Tribe and the BIA, "It is the responsibility of appropriate Bureau...line officers to ensure the selected IRMP alternatives are implemented." (30 BIAM Supplement 10,

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[6]Bureau of Indian Affairs, 30 BIAM Supplement 10.

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§4.1) This means that tribes that develop resource plans can compel the BIA to follow a course determined by the tribe.

The development of a plan could also provide an impetus to make resource management more coherent and to develop the Tribe's management and research capacity. The Confederated Salish and Kootenai Tribes found that:

> Over the years, the Tribes adopted a variety of ordinances governing land and resources without a comprehensive policy framework to provide a vision…Management and regulatory activities have often been initiated in response to a crisis resulting in a "piecemeal" approach to planned resource management. This process has resulted in overlap, confusion and inconsistency in policy development. (S&K, 1988, 2)

The creation of a planning process brought Tribal leaders and members to face the problems of their way of making policy, and agreement emerged on the need for more comprehensive planning. The process of developing the plan required the cooperation of resource managers from all parts of the reservation and the creation of a centrally positioned office to coordinate the generation and implementation of the plan. At first, this took the form of a Resources Planning Office joined by a Core Technical Team. As the project evolves, a clearinghouse is proposed through which resource management plans will pass to ensure implementation follows comprehensive plan guidelines.

At the White Mountain Apache Tribe the development of a planning process could have the same stream of effects. The Natural Resource Committee as it currently stands is primarily concerned with the allocation of timber, and the committee members who are not directly connected to timber management do not feel engaged or important.[7] By developing a new institution that would be more broadly based than the Natural Resource Committee or by expanding and balancing the members and duties of the Natural Resources Committee, the Tribe could engage the managers of all the Tribe's resources and make resource planning more comprehensive.

Embarking on a project to develop a plan could also provide the impetus and justification for developing the Tribe's institutional capacity for resource management. The Salish & Kootenai Tribes found that the

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[7] Several members commented that attendance of Committee members who did not manage or use timber resources directly was sporadic. Some Committee members who did not feel engaged, felt the Natural Resources Committee had virtually the same duties as the now-defunct Timber Committee and did not often need nor solicit their input.(Gatewood, Albert, Jojola)

process of developing a comprehensive resource management plan required even more personnel than they had in their well-developed Natural Resources Department.[8] Their Council's decision to support planning enabled them to justify in grant applications, four and a half additional FTE's for the planning process, of which two were funded. At the White Mountain Apache Tribe where institutional capacity is considerably less well developed, creating a plan could a) justify grant applications and P.L. 638 contracts and b) provide a way for the Tribe to commit itself to maintaining institutional capacity it has already been planning.[9]

Social Learning and Developing a Vision

Finally, and perhaps most importantly, the development of a plan could be the vehicle by which the Tribe articulates and implements a long-term vision for its members, institutions and resources. The Salish & Kootenai Tribes began their planning process by formulating a vision of what the Tribes could look like in the year 2000. (see Fig. 1 in Appendix A) This formed the basis for eventual discussion of scope and goals. (Salish & Kootenai,1988) The White Mountain Apache Tribe might also find it useful to begin with a vision of where it wants to be when the next century opens. Once Tribal vision is developed, the Tribe will almost naturally begin to face the obstacles to that vision of the current institutional arrangements. If, for example, the Tribe wants to develop its own forest management capacity so that it is not beholden to the BIA's analysis and prescriptions, it will have to face the question of why educated young Apaches find the job security in the BIA or off the reservation so alluring. If the Tribe wants to develop sustainable multiple resource use and extraction on the reservation so that all generations will benefit from their natural heritage, it will have to face the question of timber's dominance in Council and Natural Resource Committee discussions. If the Tribe takes planning seriously and develops a commitment to the planning process early, it is likely that the Tribe will not only face the obstacles to its vision, but work to surmount them as well.

In order for these and other benefits of planning to accrue to the Tribe, the Tribe would have to do all it could to make sure the planning process and the plan itself work toward these ends. The Tribe could embark

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[8]The Salish & Kootenai Tribes' Natural Resources Department has 74 FTE's including 20 professionals most of whom are members.
[9]The Tribe has already been considering full development of a Department of Forestry. Embarking on a planning process could provide further impetus for developing this and other natural resource management capabilities.

on the planning process but fail to keep these benefits in mind as goals for the process, in which case it might finish what is sure to be an arduous process with diminished returns. Hopefully, the lessons of the Salish and Kootenai Tribes and the theory of development planning can offer guidance to avoid such pitfalls.

II. Principles for Developing a Plan

The experience of the Salish and Kootenai Tribes can be best translated to the Apache case if it is first distilled into principles removed from the particular details of their government and resources. Principles can also be gleaned from representative articles from the literature of development planning and from the BIA's guidelines for Integrated Resource Management Plans. The example of the Salish and Kootenai Tribes may be particularly useful to the White Mountain Apache Tribe because it is not only exemplary in its design, but because it takes advantage of the Confederated Tribes' well-developed bureaucracy, which can serve as a model to the White Mountain Apache Tribe. Other tribes have begun developing Integrated Resource Management Plans, but many have shortcomings that would make their application to the White Mountain Apache Tribe imprudent. Some have plans that are well developed for each resource yet do not integrate planning across resources. Others were developed largely by technical experts and do not include public or political values to the degree that the Salish and Kootenai Tribes did. Still others followed the BIA's guidelines closely, which, while not a bad model in itself, would not likely be palatable to the White Mountain Apache Tribe given existing animosity and litigation. In sum, the Salish and Kootenai example is both technically outstanding and strategically valuable for the White Mountain Apache Tribe to examine.[10]

This analysis also depends heavily on the experience of development projects in general and the experience of the marble industry in Macael, Spain in particular. The experiences of several development projects overseas are insightfully represented in Samuel Paul's "Strategic Management in Development Programs: Evidence from an International Study." In his piece, Paul identifies what he considers to be the critical elements of management strategy in six of the most highly regarded development projects around

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[10]It should be noted that virtually all the tribes are just beginning the planning process, and no case study can offer the wisdom of hindsight.

the world. His formulation of these principles is applicable to the situation at the Fort Apache

Reservation and to the development of a planning process.

The experience of the marble industry in Spain's Andalusia region also has lessons for the planning

process the White Mountain Apache Tribe is considering. Michael Barzelay's article on the successful

experience of the Institute of Industrial Promotion of Andalusia (IPIA) in the county of Macael draws

clinical interpretations for application of the lessons learned there to other local development projects. The

method the IPIA used to direct participants' attention on the "need to improve natural resource utilization,

product quality, marketing strategy, infrastructure, plant and equipment, access to financing, procurement,

working conditions and training" (Barzelay, 272) will be useful in developing a prototypical planning

process for the White Mountain Apache Tribe.

There is also appropriate advice in the BIA's guidelines for Integrated Resource Management Plans

(IRMP's). Bureau of Indian Affairs Manual Supplement 10 gives guidelines for the process of developing an

IRMP, and while they are generic recommendations because they were designed for tribes across the nation,

they do contain principles the White Mountain Apache Tribe is encouraged to consider when it develops its

customized planning process.[11]

The principles extracted from these sources are divided below into two sections. The first is a general

discussion that suggests a time table for the planning process. Following it is a collection of characteristics

others have found helpful in managing the players in a planning process. It includes some discussion of who

might be incorporated into the process and how the players might be organized to ensure a successful

outcome. The final section reviews some benefits that might accrue to the Tribe were it to follow these

principles.

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[11]These guidelines (30 BIAM Supplement 10) are useful for the Tribe to note for two other reasons: 1) As mentioned earlier, a properly developed plan can mean than Tribal goals guide Agency policy; and 2) The BIA is required to work with the Tribe to develop an IRMP or develop one itself and if the Tribe develops its own within the (minimally troublesome) BIA guidelines, it can avoid an IRMP imposed by the BIA.

Stages of the Planning Process

1. Deciding to Begin

Common sense suggests that the first place to start when developing a plan is in deciding to plan. This point is so obvious that planners may neglect it by assuming planning is understood to be necessary either because there is a mandate to plan or because the lack of planning is so obviously harmful. However, neglecting this decision can be strategically damaging for the planning process. Both the Salish & Kootenai Tribes and the BIA's IRMP guidelines begin with careful consideration of the need for planning and of the process by which the plan will be designed. The Salish & Kootenai Tribes spent an entire year examining possible approaches to planning, defining the structure of the planning process and mobilizing political support for the planning work program (see Fig. 1 in Appendix A). They found that by carefully considering the decision to plan and the form planning would take, they were able to create political commitment to the process early on. This commitment helped them persevere through the tough work of designing the plan. (Dupuis, 1/27)

The BIA also recommends that there be a "Determination of Need" at the start of the planning process. The guideline suggests that this Determination may arise out of a controversy, a unique opportunity, program reviews, a procedural mandate or a change in policy. (BIAM Supplement 10, 3) While the first two, (a controversy or opportunity) may provide the impetus for planning to begin, the Tribe may find a proactive approach (as in the latter three) more enduring than a reactive one; if the original crisis, or opportunity were to fade, the reason for planning might also fade. If planning is developed for strategic reasons to implement a vision for the future or to accomplish Tribal goals, the planning process is more likely to have sustainable momentum.

It may also be noted that the planning process could begin simply because the BIA has mandated that IRMP's be "acquired and maintained."(§ 1.3) While evaluating the BIA's directive for IRMP's is the genesis of this report, it is a poor motivation for the Tribe to begin planning. Tribal members are likely to see the imposition of the mandate as another intrusion of the BIA into Tribal affairs. Instead, the Tribe would be better served if it conceived of planning as a vehicle to further its own goals because to do so would engender Tribal ownership of the plan and pride in it.

One final issue concerning the decision to plan is worth mentioning. The Tribal leadership may want to think strategically about when to begin the planning process. Elections, budget deficits, litigation and many other predictable and unpredictable conditions or events will influence the process. Starting the process well before the elections, for example, could affect the outcome of the process by allowing goal setting and process design to be isolated from campaign politics, i.e., the process could be into the technical phases by the elections. Obviously, different groups and individuals around the reservation may have varying opinions about when the process should begin and how it is scheduled. The decision to plan can be used strategically to influence the outcome of the planning process.

Planning can begin just because some feel it is a good idea, because the BIA suggests that it be done or because a crisis of disorganization calls for orchestration. While these justifications might be easy to embrace, it would be better over the long-term to consider carefully what the Tribe hopes to accomplish by planning, and thereby create a justification for planning that is reasoned and originates within the Tribe. Such a justification would lay a firm foundation on which to build a process.

2. *Defining the Roles Institutions and Individuals Will Play*

The first step after deciding to plan is determining who will plan and how they may interact. In considering how it will work with the BIA, consultants, counties and others who have jurisdiction over or interest in the Tribe's resource planning, the Tribe will accomplish two things: 1) it will circumscribe the roles of others and thereby assert control over the planning process and 2) it will implicitly or explicitly define the role it wants to play. Both could contribute to the plan's benefits of greater Tribal sovereignty and capability.

The Salish & Kootenai Tribes delineated the role the BIA would play by taking advantage of provisions in 30 BIAM Supplement 10, which recommend writing a Memorandum of Understanding between the BIA and the Tribes(see Appendix C: 30 BIAM Supplement 10, p 4 and Illus. 4). While Supplement 10 recommends a technical team of both Tribal and BIA technical personnel, the Salish & Kootenai Tribes designed a structure that separated the technical staff into two teams (see Fig. 2). The central planning organization, the Tribal Resource Planning Office, served as a liaison between the two teams and the role of

the BIA team was primarily to provide data and to make the Tribes aware of trust responsibilities rather than to provide analytical or prescriptive support. (S&K, 1988, 6-7)[12]

Planning Structure Used by
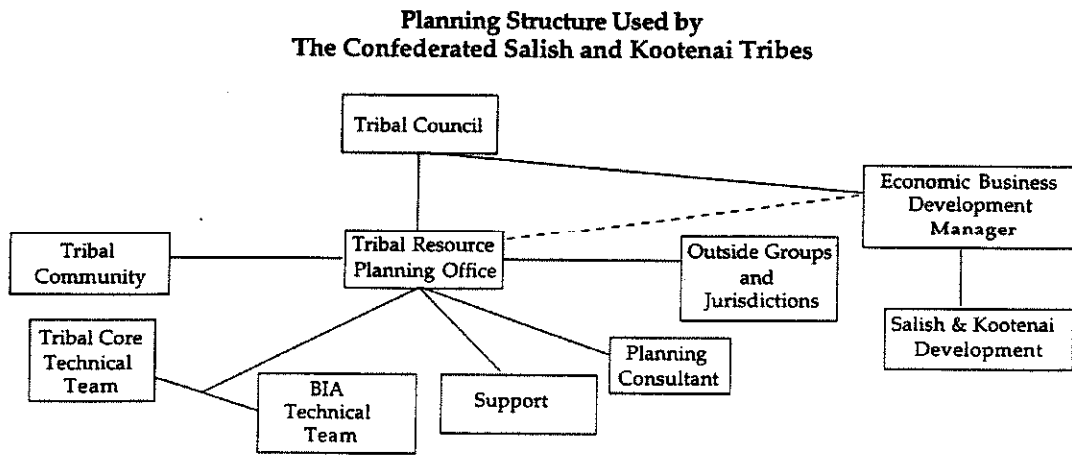**The Confederated Salish and Kootenai Tribes**

Figure 2

The White Mountain Apache Tribe might find this tactic helpful for delimiting the BIA's role and for spurring the development of Tribal expertise in resource management.

The Tribe might also want to consider how it could establish an organization that would remain above the conflict, refrain from introducing substantive recommendations and intervene to facilitate the negotiation of goals and policies. Such an organization might be advised by an outside consultant with experience in mediation and natural resource management as was done at the Flathead Reservation. Or, the Tribe could choose elders, medicine men and women, or clan leaders who represent the different factions of Tribal politics yet who can remain above political conflict. Were these people both concerned with the long-term health of the Tribe and respected as representatives of the factions, they could serve as a moderating influence over all the interests that will inevitably conflict when planning gets underway.

There is also the question of how the people and the Council should participate in the planning process. The Council, since it is the Tribe's legislating body, will have to authorize and approve anything the planning groups propose that involves major changes in policy or appropriation. A not so obvious task that

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[12]The Salish & Kootenai Tribes also had to describe the role owners of allotted lands and local governments would play in the planning process. While allotted lands are not an issue at the Fort Apache Reservation, there are outside organizations like the Salt River Project, the US Forest Service, the county and state governments and retained lawyers and consultants who will invariably be interested in how planning is carried out. The roles of these outside players should be considered carefully before the planning process begins.

is also appropriate for the Council is the articulation of goals and values. The decisions made by the technical teams only span a narrow range of scientific, managerial and economic issues. The technical staff will have to depend on the people of the White Mountain Apache Tribe and their representatives to make value judgments. Therefore, the Council can play a role in determining what resources to include in the plan, what goals to set for the plan and what sets of policies best accomplish the goals since these are all value questions.

As at the Flathead Reservation, the general public of the White Mountain Apache Tribe could have a role to play. In each phase that involved value judgments, i.e., defining the scope, setting goals and management priorities or defining issues or options, the planning staff consulted with the public (both Indian and non-Indian) in several hearings around the Flathead Reservation. This could have two beneficial effects were it used by the White Mountain Apache Tribe: 1) it could raise pressure on the planners by generating public interest in and demand for a successful plan, and 2) it could increase perceptions that the plan is "owned" by the Tribe and thereby increase commitment to it.

Finally, roles of outside players would have to be circumscribed before the planning begins. When word gets out that the Tribe is working on a comprehensive resource plan, outside interests will want to influence the final plan and obtain information about its development. It will be much easier to control these potential entrants if the Tribe decides beforehand how it wants them to participate, if at all.

3. Defining the Scope of the Plan

Once the Tribe has decided to plan and defined the procedural roles of Tribal and non-Tribal organizations, the Tribe would be ready to define the period of and topics covered by the plan. The temporal scope is a fairly easy issue to resolve. The BIA stipulates that IRMP's not exceed the planning cycles the BIA uses. Since many of the BIA's most important plans run for a decade at a time, the Tribe might find it is easiest to adopt that planning cycle. The topics covered by the plan are much more difficult to define. On the one hand, the more issues are included, the more likely the plan will balance competing claims on resources that are not currently balanced. The BIA includes the following as possible resources:

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Agriculture	Archeology	Culture	Fish
Hydrology	Minerals	Range	Recreation
Social	Soil	Species	Timber
Wildlife			

(BIAM Supplement 10, §3.1B(2))

On the other hand, the more issues in the planning process, the more cloudy the discussion will be when issues arise where there is little common expertise.[13] Planners of the Salish & Kootenai Tribes recommend that the planning process refrain from developing a general economic plan and from considering social issues in too much detail. They felt the process was arduous enough without including programmatic social issues bearing little on how resources are developed.[14] The Salish & Kootenai Tribes also found that the development of a plan scope also affected the way the process would be designed. The process of defining the scope that they went through indicated to the plan designers what data needs would have to be met and what analysts and managers would have to be included. It also underscored the previously determined purposes for the planning process. (Dupuis)

Defining the scope of the plan also enables the Tribe to establish the relationship the comprehensive plan will have with existing plans, ordinances or resolutions covering resources. The Flathead Tribe found it was useful to determine the relationship between existing plans for specific uses and the overarching plan before designing the comprehensive plan itself (see Fig. 1 in Appendix A).

4. *Articulating the Goals of the Plan*

Having determined the scope, the Tribe will likely find it helpful to outline the goals of the plan. The experience of IPIA in Andalusia showed that the articulation of goals was heavily influenced by the research that marble industrialists did about their own problems. The marble companies found that doing research changed their perceptions of what their goals ought to be. In their case, taking tours of other, more advanced, facilities and the inclusion of aerial and scientific data caused industry management to agree on objective conditions. This agreement formed a foundation upon which goal setting discussions could be based

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[13]Health and timber issues, for example, require differentiated expertise and have little or no bearing on each other, yet they might fit within the BIA's broad list of possible resources to include in IRMP's.

[14]The Tribe may legitimately decide to include social issues, for example, in a comprehensive resource plan since land use planning can guide housing policy, but the Tribe would benefit from making explicit the social resource uses it wants to incorporate and exclude.

(Barzelay, 278). The White Mountain Apache Tribe might find it useful after defining a plan scope to engage managers and scientists in field visits and formal research into current and historical uses of the Tribe's natural resources. Such investigation might provide the basis for a common understanding of the what the plan needs to accomplish.

The Confederated Salish & Kootenai Tribes found that setting their goals for the Reservation as a whole provided a means of setting the goals for their Comprehensive Resource Plan. Before starting the pre-planning phase (Phase I) they listed ten long-term goals:

> Provide open and responsive Tribal government
> Protect and preserve Tribal rights
> Protect individual rights
> Maintain cultural and Tribal identity
> Develop economic independence for the Tribes and Tribal Members
> Create Tribal unity and harmony
> Develop expertise within the membership
> Sustain a high degree of personal health
> Gain freedom from bureaucratic controls
> Preserve, protect and enhance environmental quality.
> (S&K, 1990, 12)

These goals were then refined as the Tribes began the resource planning project and conducted public hearings to articulate goals for the planning process. By selecting these goals as a starting point, the Tribes hoped to make fundamental issues the center of discussion rather than the petty or parochial issues that had regularly characterized debates about natural resource policy.

The White Mountain Apache Tribe may find developing a set of long-term goals useful not only for this planning process but for guiding other decisions as well. Certainly starting with goal setting can help reduce conflict later in the process. Goal setting is sure to be contentious unless goals are vague to the point of being worthless, but insisting on specific goals and settling the inevitable value conflicts can provide a foundation upon which later disagreements can rely for a common set of criteria or values for comparison. Once basic goals have been hammered out, the Tribe can turn its attention to the study of existing conditions and possible policies.

5. Research and Analysis

Data collection and interpretation do more than just serve the scientific needs of the planning process, they can be strategically used to influence the success of the process. In the case of the Macael quarries,

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research was used to bring together factions who had opposing subjective interpretations of what needed to be done to pull the marble industry out of its slump. Barzelay notes, "Intense conflict is to be expected when people whose perceptions of reality are untested interact for the first time." (276) Both field research by participants and conventional research by experts modulated these conflicts by creating greater consensus about the objective conditions of the industry. IPIA used aerial photographs and geological studies to change perceptions of the problems facing the industry. As the industry did more research, it began to believe its problems were not beyond its control (i.e., the marble was not poor quality as originally it was believed to be) rather that the obstacles (property allocation and technology) were easily surmounted by collective action. (277-8) In Macael, once the IPIA had dispelled the belief that the industry was a victim of nature by showing quarry managers the tremendous natural wealth that was available to them, IPIA sponsored tours for managers so they could see firsthand the highly advanced marble processing plants and quarries that existed elsewhere in Europe. This transformed what had been a contentious planning process based on multiple subjective realities into one where the players agreed on the diagnosis if not the cure.

The lesson for the White Mountain Apache Tribe may be that research and analysis are best shared and used strategically to advance the process rather than simply left to experts within the Tribe's or the BIA's bureaucracy. The Tribe could use research to educate itself about its resource base either by widely distributing the task of research so that many learn firsthand about the objective reality of natural resource use or by educating people through more traditional means of public education. Both strategies have merits that depend on the purpose of the education, the audience and the information's accessibility. The Tribe will be able to use both methods not only for influencing the outcome of the planning process but for increasing Tribal commitment to the plan as well.

Research and analysis can also be used to increase commitment to the integrated approach. Samuel Paul's interpretation of successful development projects indicates that when projects are jointly planned and reviewed by the agencies that will have to implement the plan, there is likely to be more thorough implementation. (20) In Macael, Barzelay found that the process was aided by the forming of subcommittees of managers and owners to do research. Each committee identified problems, possible

solutions and responsibilities. This had the affect of muting the disputes when the final draft reports were assembled:

> Some disputes about facts were resolved by investigation or expert opinion, committee members had experienced working together, and every participant felt ownership of at least one subcommittee's draft report. (275)

If the research conducted in the process of developing the White Mountain Apache Tribe resource plan were combined strategically with education and prepared by diverse groups around the reservation, research would be more than just a necessary part of the plan; it could be used strategically to build consensus and momentum for the plan's development and implementation. Incorporating experiential as well as conventional research could cause people to agree on a diagnosis. Incorporating the managers and directors responsible for implementing the plan could encourage agreement on a cure and improve the chances the plan will be effectively implemented.

6. Developing and Comparing Alternatives

As the process of research and analysis comes to a close it is inevitable that actual plan policies will emerge. The technical teams or committees that put together the research reports may want to narrow the set of policies down to a final recommendation to make to the Tribal Council. Rather than do that, however, it may prove beneficial for the recommendations to be made to the Council and the public in the form of multiple alternatives presented with the expected outcomes for each of the original goals. Also, if the choice of the policies is made in the same arena as the selection of goals (public hearings, referenda, Council votes, etc.), there is likely to be greater coherence between the Tribe's purpose and the final alternatives for the plan than if the technical teams or committees doing the research tried to select the alternatives as proxies.

The Salish & Kootenai Tribes sought public deliberation on the alternatives before they selected a final plan. In Phase III of their planning process, they forecast outputs and impacts for their proposed alternatives with the Council. Objectives developed from this process and which respond to the issues, goals, and preferred alternatives are to be reviewed by non-Tribal parties (see Fig. 1 in Appendix A). Draft guidelines for IRMP's also recommend a similar though not as democratic approach. Following this review period and after considering all comments, the plan's policies "shall be referred to the Tribal Council for

adoption through a formal resolution." (BIAM Supplement 10, §2.1G) If the Tribal Council and/or public were to ratify a set of alternatives there would only be one more obstacle to final implementation—statutory review by the legal staffs.[15]

7. *Implementation and Performance Review*

Since the purpose of the planning process is to change the way the Tribe manages its resources, the Tribe would need to turn its plan into guidelines for the BIA, the enterprise managers and the department directors to follow in making their day-to-day decisions and resource-specific plans. It also would be beneficial to establish mechanisms that review the planning process so that lessons from the Tribe's experience can be systematically collected for application to later planning. It is conceivable that the planning document could wind up as a meaningless report with little effect on the operations of Tribal managers if a commitment to the rationale behind development of a plan (change) is not made. To ensure the plan does not become just another report, the Salish & Kootenai Tribes are developing guidelines for each resource and establishing a clearinghouse that will monitor implementation by the different agencies to make sure the plan results in real change. (See Fig. 1 in Appendix A) The White Mountain Apache Tribe may also find this valuable to do.

Thus far, this section has covered some basic components of successful planning projects and their possible strategic uses above and beyond their functional purposes. These components were:

> Deciding to plan
> Defining roles individuals and groups will play
> Choosing a scope
> Articulating goals
> Conducting research and analysis
> Developing and comparing alternatives
> Implementing and reviewing the plan

Each of them has a functional purpose for the plan. Goals, for example, have to be specified to guide the plan toward future outcomes. These components can also have strategic purposes if they are properly

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[15]The experience of the Salish & Kootenai Tribes cautions against making the plan a detailed allocation document since doing so would complicate the NEPA review process. The legal implications for the plan of both NEPA review and a compliance reviews for other statutes are quite serious, and the planners at the Flathead Reservation recommend including tribal lawyers at every stage of the planning process. (Dupuis, 1/27) This will be discussed in more detail later in the paper.

conceived. Articulating goals, to continue the example, can serve to mobilize support or demand for planning or can serve as the basis for reducing conflict later in the planning process. The White Mountain Apache Tribe could profit from considering both the functional and the strategic components of each phase in whatever process it develops.

Managing the Players

In addition to the necessary stages of a planning process there are other aspects of planning whose consideration is important for affecting the successful completion of a plan. This section considers conflict and its moderation, key players to include in the process, and the organization of the participants.

Regulating Conflict

Conflict in planning natural resource use is inevitable. The question for the White Mountain Apache Tribe is how to use conflict strategically to advance the purpose of the planning process. Conflict can be averted, incorporated and modulated to enhance the likelihood that the plan will be broadly supported and result in a sustained agreement among groups in the Tribe.

The IPIA in Spain found that averting conflict early in the planning generated momentum and created an atmosphere of joint action. When the IPIA first met with industry association leaders it insisted at the end of the meeting in unanimous support as a condition for IPIA's participation. Unanimity created a joint commitment to facing the hard work ahead. It established a tradition for major agreements that engendered a group norm that all parties' voices were legitimate. It enabled the industry to present a unified front to the financiers and agencies to whom they appealed for assistance. This tactic of insisting on unanimity in deciding to plan also

> frames as sharply as possible the question of whether to continue sliding into crisis or to work together towards a common solution, drawing to some degree on outside help.
> (Barzelay, 274)

The IPIA also avoided conflict by bringing up easy decisions at the outset of the discussions. By starting with moderately contentious issues, the IPIA was able to generate momentum and optimism for the process. Such sentiment was a reserve on which the participants could depend when more contentious issues emerged. (Barzelay, 282) Barzelay also found that the role of the leader or facilitator was strategically important. In Macael, the facilitator ensured diverse opinions were heard, focused attention on a roster of

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key issues and helped participants get over their disagreements. (276) The importance of a facilitator is corroborated by experience of the Salish & Kootenai Tribes; an outside consultant who played the role of coordinator for the Tribes' planning process was adept at getting the Tribes to address their conflict without injecting himself into the substantive issues.[16] This helped the Tribes address differences of opinion, rather than become sidetracked by preexisting feuds or animosities. (Dupuis, 1/27)

Not only can the pacing of contentious issues and the facilitation of conflict resolution improve chances for success, but the way the planning process is framed can influence the outcome. If the process is framed as a negotiated one in which all players have an equal right to be at the table and to claim value for themselves, participants will take ownership in the product, the final agreement will be more durable and the chances of the plan affecting real changes in resource use are greater. If all relevant players are invited to join the planning process and are given equitable opportunity to affect the plan, they will be more likely to support the final plan though it may involve compromising their original visions. Leaving players out of the process intentionally or inadvertently will create an impression that the plan is an inside deal among a few of the factions. Such perceptions whether valid or not undermine the long-term durability of an agreement and it is often difficult to add excluded parties after the process is completed. The Tribe might therefore find it worthwhile to cast a wide net in selecting the participants of the planning process, to genuinely include diverse opinions and to allow the participants themselves to narrow the committee or task force (for expediency) either by self-selection, choosing proxies or dividing into subcommittees.

There may also be valid reasons for making the planning process fairly closed rather than inclusive. Opinions about natural resource uses are often highly charged and occasionally impossible to include in a civilized process. In such a case, it might make more sense to close the process down by excluding many players and then have the first public view of the plan be when the Council reviews it. The Tribe could then avert destructive conflicts and concentrate public discussion in a relatively short time. Such an

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[16]Doug Dupuis, Tribal Resources Planning Coordinator for the Confederated Salish & Kootenai Tribes and others raved about Charles Johnson, a consultant of the Johnson–Trussel Company, [Resource Management Consultants of Albuquerque (505) 822-9596]. He claimed the money invested in his services was well spent. Nevertheless, he recommended investigating several of the five or six good consulting firms specializing in Indian natural resource planning before choosing.

approach may be more culturally attune with Apache politics yet may run the risk of being too one-sided for long-term support for the plan to emerge.

Just as the Tribe needs to think about the strategic aspects of the stages of the process, it needs to think strategically of how conflict will be incorporated. Conflict will be inevitable and how the process incorporates or excludes it could have serious long-term impacts on the plan's success. The same can be said for the way in which players in the process are included.

Players in the Planning Process

The most salient advice on whom to include comes from the experience of the Confederated Salish & Kootenai Tribes. Planners there recommend including consultants, the public and Tribal lawyers in addition to the natural resource managers. (Dupuis, 1/27) They found the consultant useful in shaping the framework for the plan. For example, the consultant designed methodologies and guidelines for each document within the plan. The consultant also developed review processes, an implementation clearinghouse, monitoring systems and comparative analysis of neighboring jurisdictions' plans. (S&K, 1990) His expertise was valuable since the Tribes had not developed a comprehensive plan before. Yet, by remaining relatively isolated from the substantive issues at stake and the actual writing of the plan, he was able to play the part of a neutral arbiter. If the central planning organization both delineates the role and pays the salary of the consultant, it can claim ownership of the product. It will be critically important for the ultimate success of the plan that it not be a consultant's plan but one driven by the Tribe.

The Salish & Kootenai Tribes also made extensive use of public meetings and hearings. They held six community meetings in six different locations on the reservation, seven meetings with county commissions and planners, two meetings with Tribal elders and cultural committees, one meeting with the Tribal Council and two meetings between the Tribal and BIA technical teams just for the second phase of planning (see Fig. 1 in Appendix A; S & K 1990). The early meetings were closed to non-members, and all meetings were used to decide what issues to include in the scope, what existing conditions were, what goals for all the resources would be and what policy alternative to select for each goal. Input from the public and from political leaders accomplishes two things: 1) it gives value questions to the general public and leaves the technical work to the technical teams and 2) it engages the public and creates demand for a successful plan. As Samuel

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Paul points out, one critical component of successful development projects is the creation of demand from below for the projects' services. (17) With pressure from below, political leaders are eager to see the project develop.

The Salish & Kootenai Tribes also found that incorporating their legal staffs into all phases of the process as advisors and troubleshooters was helpful. The completion of a comprehensive plan in general and an IRMP in particular requires legal advice to avoid violation of existing statutes and to avoid strategic conflicts with existing litigation. The BIA's IRMP guidelines list several major statutes with which a plan must comply:

> National Environmental Protection Act
> Endangered Species Act
> Archaeological Resources Preservation Act
> National Historical Preservation Act

And there may be others. (BIAM Supplement 10, §3.1D) The Salish & Kootenai Tribes also found that the legal staff could be helpful for pointing out where the Tribe's plan might run up against existing litigation, legal strategy and internal ordinances or resolutions.[17] All this said, they were careful to make the role of lawyers advisory and not a role of direct articulation of the plan itself. (Dupuis. 3/13)

Finally there are the resource managers and staffs. Their inclusion in the process may seem plainly obvious, but the manner in which they are included has strategic implications. At Warm Springs IRMP planners issued an open invitation to managers yet few managers were centrally involved in planning. When the draft plan was released, the managers criticized it harshly. (Inman) This bears out Samuel Paul's observation that including the implementing managers in the design of a project is necessary for its ultimate success. The technical staffs, are also a necessary component of the planning process since they are best suited to evaluating the potential of resources for meeting the goals laid out in the plan. However, the White Mountain Apache Tribe has little balance in its resource staff. For timber management the Tribe has relied on consultants and one forester with no staff, yet in wildlife management there is a capable staff that includes wildlife biologists, a fisheries manager, numerous game rangers and others. The Salish &

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[17]Several people interviewed at the Fort Apache reservation thought getting the support of the Tribe's water rights attorney for planning would be helpful not only because he would be able to guide the plan to fulfill the strategic needs of the water rights suit, but because his considerable influence on the reservation would give added momentum to the plan.

Kootenai Tribes have a well-developed Natural Resources Department that employs seventy-four people including twenty full-time professionals and thirty-five technical and support positions.[18] Since the Salish & Kootenai Tribes have an extensive and capable Tribal staff, the final plan was largely written by Tribal members and the members felt more pride for their plan than they would have if the plan had been done by a consultant. While it is considering a scope and a process, the White Mountain Apache Tribe could seize the opportunity for developing its resource management capabilities further and move forward with greater speed than it is now.

The resource managers can also play a strategic part beyond the contribution of their technical skills and planning backgrounds. As Samuel Paul noted in his analysis of development projects, the inclusion in the design and review stages of as many people involved in the final implementation as possible makes the success of the project more likely. (13) Bringing these managers together at the planning stages accomplishes three things: 1) they can eliminate goals that are impractical or unfeasible, 2) they can monitor their counterparts' compliance with the plan and 3) by incorporating their own interests in the plan, become supporters eager to see it succeed. There is a risk, however, that the inclusion of high-level management can stall the process by injecting turf battles or political fights into the process. It is a dilemma that their exclusion from the process could weaken implementation and their inclusion could increase political tensions beyond the capacity of the process for handling conflict.

Organizing the Participants in the Process

Once the Tribal leadership determines the composition of its planning group, it needs to consider the best way to organize the players. On the one hand, since the technical staffs already exist for some of the resources and since the Tribal Council is committed to creating resource staffs for other resources,(Kulosa) it seems prudent to develop a planning structure that takes advantage of existing technical capabilities rather than setting up a duplicate organization. On the other hand, the enormity of the task suggests that a full-time planning organization, though costly, would have the time and resources to plan for the Tribe over the long haul. The experience of the Salish & Kootenai Tribes suggests a compromise may be the most

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[18]This does not include the Tribal and BIA forestry programs, cultural resource specialists, and numerous other Tribal specialists who were instrumental in the planning process.

efficient way to develop a planning group. They established a central planning organization, the Tribal Resource Planning Office, that served as a liaison between the BIA and Tribal Technical Teams, held hearings with the public, solicited opinions from outside groups and drafted cooperative agreements with them, coordinated support staffs and the consultant, and cooperated with other branches of the government with jurisdiction over development. It was ultimately responsible to the Tribal Council and collated and completed the draft components of the two plan volumes. (S&K, 1990, 15-16) The Resource Planning Office applied for and was awarded a grant that provided funding for two FTE's to be used only for the planning process (S&K, 1990, 11-12) and found that they needed 5 to 20% of the time of the regular full-time resource managers, technical and planning staffs for the preparation of the draft reports. One full-time position was also provided by the Confederated Tribes to manage the project (Dupuis, 1/27).

Further supporting the argument for a central organization that coordinates planning, Samuel Paul found that the best development projects were networked organizations rather than hierarchical or monolithic bureaucracies. If the central agency with authority for the project had control of funds and political support at the highest levels of government, it did not matter that formal authority was widely dispersed. Paul also noted that this kind of structure allows for controlled autonomy by leaving the line agencies to make their own implementation decisions yet gives the central organization the power to reign in the agencies that strayed from the plan. These lessons can clearly be applied to the design of a prototype planning process for the White Mountain Apache Tribe.

Advantages of these Principles:

Besides the benefits of economic efficiency and Tribal sovereignty mentioned at the start of this report, the careful application of the principles outlined in this part of the report could yield important side benefits. First, the Tribe could develop a greater sense of its own self-governing abilities. Were the Tribe to develop a plan largely without the assistance or intervention of the BIA, it could develop the capacity and confidence to take further steps toward greater self-determination and sovereignty. Second, the planning process could develop a strategic vision that would encompass the conditions on the reservation and the competitive environment it finds itself in. Such a vision could take advantage of opportunities for greater economic development. Finally, the process of creating a long range plan can motivate the next stages of

Tribal institutional development. The Tribe has already hinted a willingness to develop its own forest management capability, and the process of planning for comprehensive resource management will provide the impetus for the Tribe to develop a detailed plan outlining what functions it would take over from the BIA or develop from scratch.

The next part of this report outlines the phases of planning the Tribe might want to consider and possible institutions to do the work in each phase. It tries to match the lessons from part two with the realities of the Tribe's political, economic and institutional context. It is intended to be a sketch and not a full picture; it is intended as a prototype for the Tribe to use as a jumping off point in its deliberations over whether to plan and what planning might look like, not as a specific recommendation for a policy or institutional design.

III A Prototype of a Planning Process for the White Mountain Apache Tribe

Planning of any kind requires phased design. Generically speaking, a planning process cannot select alternatives until it has evaluated existing conditions and established goals. It cannot assess existing conditions and establish goals until a scope has been set. In the BIA's more specific terms, planning must follow the following order of tasks:

1. Determination of Need	6. Consolidation and Review of Draft
2. Organizational Meetings	7. Alternative Selection
3. Scoping	8. NEPA Review
4. Resource Analysis	9. Plan Approval
5. Alternative Development	(§ 2.1A-F)

And, though they avoided the need for a National Environmental Policy Act(NEPA) review as much as they could, the Salish & Kootenai Tribes followed virtually the same process.[19] (See Fig. 1 in Appendix A and Appendix B) In sum, the ordering of the stages of planning is straightforward and not subject to much disagreement.

Who takes responsibility for the planning phases and how they are completed is much more debatable. The selection of goals, for example, could be done by majority vote, executive decision, committee

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[19]The Salish & Kootenai Tribes designed their plan to be a collection of guidelines rather than an allocation document to make NEPA review less onerous.

recommendation, or Council resolution. Each method has particular advantages to recommend it and drawbacks that might suggest other alternatives.

The sections that follow outline a phased process and a suggestion of who might do the work of each phase and how it might be done. The suggestions should be taken as proposals to spark discussion about the process rather than as recommendations for the Tribe to consider implementing. Obviously, the Tribe will be much more aware of local political, social and economic conditions and will be better suited to designing their own process. Hopefully, proposing this alternative will get the discussion started.

The prototype consists of a four-stage planning process. These stages entail 1) preparing for planning, 2) choosing goals the plan should accomplish, 3)developing a plan to meet the goals, and 4) implementing and reviewing the plan. Each phase would depend on the results of the previous stage, would last roughly one year[20] and would have several sub-stages (listed in rough chronological order in Fig. 3 in Appendix A).

1. Deciding to Plan and Creating a Planning Process

The first phase would involve a discussion of planning principles among Tribal leaders, the formation of a group that would be responsible for coordinating planning, the design of a process and Tribal Council approval of the process.

In this first stage it will be important to build consensus behind the idea of planning and to realistically predict what the planning process will be like. Therefore, the first phase begins with a general meeting of

Phase 1

Deciding to Plan and Creating a Planning Process
Review of planning principles and discussion of merits of planning by Council, Directors and Managers
Formation of Planning Task Force by Council, Directors and Managers
Assessment of Tribal institutions needed for planning and definition of plan process, time frame, planning participants and roles, staffing and budgeting needs, sources of funding, plan's relation to existing plans and Memorandum of Understanding with BIA by Task Force
Review and approval of planning process, institutional design, funding and MOU by Tribal Council

[20]Similar stages took a year at the Flathead Reservation, but a planner there recommended carefully calculating the time needed for each stage and then doubling the result for good measure. Planning took much more time and many more meetings than expected for the Salish & Kootenai Tribes. (Dupuis, 1/27, 3/13)

the Tribe's main leadership. This meeting could include the Chairman, the Council, the managers of Tribal enterprises, the directors of the Tribal government and leaders from previous administrations. It could also include members of other tribes' planning staffs to add the experience of other tribes to the discussion. Intentionally absent from this list are members of the BIA staffs, consultants to the Tribe, lawyers retained by the Tribe and other outsiders. If the decision to plan is made by Tribal members without influences of the trust mandate of the BIA, the legal strategy of Tribal lawyers and other outside influences, Tribal members will be able to claim the plan as their own initiative and establish a norm for the planning process that asserts Tribal direction over the influences of others.[21] It may also be important to establish a pattern of cooperative agreement as well, and this could be done by insisting on unanimous agreement before first phase begins.

At this first meeting, Tribal leaders would also propose a Planning Task Force that would carry out the coordinating work of planning the process. The Planning Task Force would be different from committees established by the Council in that it would have only coordinating and facilitating functions, would disband after those functions were fulfilled, and would not be made up of politicians necessarily but of individuals who had the trust and respect of many Tribal groups within and beyond the Council.[22] Perhaps there are elders, medicine men or women, retired Councilmen or retired Chairmen who could form this task force whose role would be to design the planning process, negotiate among conflicting parties, conduct the public hearings, assemble the drafts of the plan and present the plan for Council approval.[23] Were the Task Force a temporary organization Tribal resources could be saved for the creation of other more important organizations like a Tribal Natural Resources Department.

However the Tribe decides to develop its central planning organization, the choice will be a critical one for the whole process since it would be the linchpin of this proposed prototype. The Planning Task Force

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[21]This by no means recommends the exclusion of the BIA, the lawyers, others from the planning process. In fact, quite the opposite is true: this report recommends their inclusion for important reasons mentioned elsewhere with the exception of three parts of the process: the decision to plan, the definition of scope and goals and the selection of alternatives.

[22]It may be wise for the Task Force to include Councilmen because they appear to be trusted salesmen when presenting decisions made by the NRC to the whole Council.

[23]Several people suggested Reymus Albert, Adam Lupe, and Erv Kulosa as people who were sufficiently independent, knowledgeable and respected for this position.

will have to regulate the competing values and players on the political and the technical sides of the process. It will have to be aware of the political conflicts among the players and remain above the fray so that it can facilitate the process. In short, the planning process will depend entirely on the ability of the members of the Task Force, and it should be developed carefully and with an eye toward the long-term success of the plan and not to satisfy the political needs of the present.

Once a Planning Task Force is selected, its first task will be to draw up its own charter and by-laws and determine its staffing needs. It will then have to plan the process and project the human, informational and financial resources necessary for the creation of a plan. The Task Force will have to define what the planning process will include: when the phases will begin and end, 2) what institutions will partake in planning and what role they will play, 3) what staff and budgetary needs will have to be satisfied, 4) what possible sources of funding are and 5) what the Memorandum of Understanding with the BIA will include. The Task Force may also have to begin applying for grant funds and developing PL 638 contracts with the BIA to support the planning process. Finally, the Task Force will have to decide whether to hire a consultant to assist them and what kind of consultant to use. Laying out this groundwork for the planning process will likely take a full year.

Once the process is designed the Planning Task Force will have to present the proposed process to the Council for review and approval. Without Council approval the process could flounder. Council approval is necessary for contracting outsiders, for contracting with the BIA for PL 638 funds[24] and for approval of the Memorandum of Understanding. Council approval would also be required for any appropriation of Tribal money necessary for completion of planning. Finally, Council approval is advisable to ensure the process is democratically supported. That Council support is so critical suggests that the Task Force keep current Council attitudes in mind when designing the process and assigning roles of players if not consult with the Council regularly. When the Council agrees to support and develop the process, the Task Force will be ready to begin developing institutions and soliciting public opinion.

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[24]Public Law 93-638 allows tribes to contract to take over "functions or portions of functions" from the BIA. The tribe then becomes a federal contractor with the objectives of the BIA functions as receivables and the budgets previously allocated to those functions as the payment for the contract. The tribe can decide whether or not to keep BIA personnel or equipment or to acquire its own.

2. Evaluating Current Conditions and Choosing Future Goals

The next phase in the process essentially is intended to help Tribal members understand where the Tribe's natural resource base stands now and articulate how they want to use or preserve the resource base in the future. It is an iterative and two-way process that involves technical experts educating the public about past use, current conditions and future possibilities and the public telling the experts what their preferences, goals and values are. It is an important process not just because later stages of planning depend on articulated goals, but because it is a way for demand for a plan to be mobilized. As Tribal members become involved in the planning process they may become increasingly eager to influence its outcome and see it succeed. If this occurs, a healthy plan would be more likely.

Phase 2

Evaluating the Present and Choosing a Future
Draft of scope of issues to be included by Council and Task Force with Legal Department
Creation of Tribal and BIA Technical Teams by Task Force
Development of additional Tribal institutions by Council and Task Force
Assessment of data needs and current conditions by Technical Teams
Hearing of public opinions about issues and goals for the plan in the four districts by Task Force
Writing of final report evaluating existing conditions and outlining goals by Task Force and Technical Teams

The second phase of planning begins with a draft of the scope of the plan. The Planning Task Force should work on this with the Council so that political values are served and at the same time tempered. This will only be a first cut at the issues to include in the plan. The list will probably be amended as public comment begins and will only finally be developed by the Task Force and Technical Teams.

Once a sketch of the scope is assembled, the Task Force will have to develop the Tribe's Technical Team, the BIA Technical Team, and the Tribal institutions necessary for the plan's development. This will be simultaneously difficult and critically important. To be considered a truly Tribal plan, the analysis of the data would need to be done by Tribal members or employees to the greatest extent possible. However, the Tribe will probably not have the in-house expertise to conduct all the analysis it needs to especially since technical work must be interdisciplinary. In the areas where it finds it does not have the capabilities, there are three options the Tribe can choose from: contract out, develop the talent and institutions internally, or let the BIA

continue to do the analysis. Contracting out has the advantage that the consultants will be agents of the

Tribe and therefore under contractual obligation to the Tribe. The disadvantage is that consultants can only be a temporary solution to the problem of diminished Tribal capacity. Developing the institutions within the Tribe, say creating a genuine Tribal Department of Forestry, will enhance the Tribe's capability of self-governance and encourage greater Tribal sovereignty. The problem with such a strategy is that the Tribe may find it hard to attract and keep talent because job security is limited given that a change of administration is enough to lose one's job.[25] It also may take longer than the Tribe has for the planning process to develop such capability. A final option is for the Tribe to allow the BIA to provide the bulk of the forestry data and analysis and use the planning process as a vehicle to assert only the Tribe's goals and values. This tactic would have the advantage of requiring little change in the way resource analysis is currently done and takes advantage of the BIA's considerable experience, data and data processing capability. However, the BIA's knowledge and experience may be little reason to pursue such a strategy given the hostility toward the BIA and litigation alleging BIA mismanagement.

There may be a way to combine the second and third strategies to simultaneously take advantage of the BIA's existing capability and give control to the Tribe. For example, the Tribe may want to use PL 638 procedures to take over the BIA's analytical and managerial functions in the area of forestry. Doing so would allow the Tribe to select the analytical methods and techniques it feels appropriate for deciding allowable cuts, burning regimes, multiple use guidelines, etc. As Erv Kulosa suggests, it would probably be wise to integrate the BIA functions under PL 638 without changing personnel at first, and make a gradual transition to a Department of Forestry fully hired and managed by the Tribe. (17-18)[26] Though it may appear that taking over the BIA's personnel and the data systems entirely is indistinguishable from letting the BIA do the analysis in the first place, doing so would only be the first step leading to the Tribe eventually taking over the functions of the BIA's branch of forestry.

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[25]Several observers on and off the Reservation noted that talented young Apaches did not find jobs for the Tribe secure and therefore that they turned to work in the BIA or off the Reservation.(McTague, Lacapa, Jojola) For the Tribal leadership to think seriously of more analytical work being done in-house they must confront this perception and address the causes of this "brain drain," if one exists.

[26]The way Erv Kulosa's preliminary phased plan for assuming BIA forestry duties was originally written, the Tribe could begin tapping into the BIA's Geographical Information System (GIS) as soon as ten months after his plan began. If his plan is not yet adopted and were to be adopted at the same time that the first phase began, the GIS could be ready for the Tribe's use by the time the second phase begins.

In conjunction with designing a phased incorporation of the BIA's natural resource staff, the Task Force would select the members of the Tribal Technical Team. Ideally, the technical aspects of the plan should be kept out of the political debate as much as possible, yet it is impossible for politics to be completely separate from analysis. Nevertheless, the Task Force should strive to keep the analysts and analysis objective. For that reason, and given tensions between the BIA and the Tribe, it should distinguish, as the Salish & Kootenai Tribes did, the BIA and Tribal Technical Teams' responsibilities.

The first task of the Technical Teams will be to assess the data needs of the plan. There is a wealth of information in the BIA's GIS system and additional information the Tribe has garnered from consultants and researchers. To the extent it is possible this existing data should be used for the plan. The Salish & Kootenai Tribes found that collection of new data would be time consuming and when at all possible, it was best to use existing data rather than conduct new studies. (Dupuis, 1/27) As the plan is intended to improve natural resource use not study it, the function of the research should be to advance change rather than to obtain a perfect understanding of Tribal resources.

While the Technical Teams begin data collation, the Task Force could begin soliciting public opinion of issues and goals. Several Apaches mentioned there were difficulties getting members to attend public .hearings unless they followed self-serving motivations. Nevertheless, the role of public input is quite important for reasons mentioned earlier. It could serve the planning process well to allow diverse members and groups comment on the issues and goals. Attendance might be encouraged by overlapping the hearing with other meetings among cattlemen's associations, for example, or by luring members with social activities before the hearing. Once the hearing took place it would be important to encourage the attendees by showing them that their views were taken seriously by recording them, probing them and, ultimately, incorporating them into the plan. The hearing is also an opportunity for the Task Force to inform and thereby mobilize the membership to support planning. As Barzelay pointed out, research can bring together disparate factions by creating a shared diagnosis of a problem. As the hearings take place, they should be dialogues rather than simply a way of soliciting public opinion.[27]

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[27]One reader of an earlier draft of this document argued that public hearings were not "the way of the Apache." She argued that the opinions of traditional, rural people were essential to the process of natural resource planning but that hearings were not an effective way of soliciting opinion in Apache society. Instead she suggested that representatives

The final sub-stage in the second phase is to collate, and summarize the findings of the Technical Teams and the records of the public hearings for approval by the Council. It is important that this be a written volume describing the scope, goals and existing conditions of the resource plan and not something less formal like a presentation because the statement of goals can serve as a planning guide for the BIA.[28] Articulating the goals will also be helpful for the next phase of the project since generating and comparing alternatives will inevitably refer to the goals as criteria to be met and as measures of comparison.

3. Generating Alternatives and Choosing Among Them

Following the assessment of resource conditions and the collection and codification of goals, the planning moves to the creative process of setting forth alternative policies and choosing among them. The generation of alternatives is perhaps best done by the Technical Teams, resource enterprise managers and department directors; in the case of the Technical Teams, they presumably have a good sense of the resource conditions having just analyzed them, and in the case of the managers and directors, they eventually implement the policies and should therefore be included in their design. The evaluation of policy alternatives, since it involves value judgments in balancing goals against each other, is likely best done by the Council and the members of the Tribe.

At the Flathead Reservation planners found that resource managers were helpful in developing a comprehensive plan because they were able to incorporate their knowledge of existing plans, resource conditions and the capabilities necessary to implement the proposed alternatives. Some ended up spending 15 to 20% of their time working on the plan. It is also useful to have the resource managers and department heads work on the plans to develop ownership in the final plan. Virtually everyone responsible for implementing the plan would write at least part of the plan.

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be selected from each of the districts to articulate traditional values about the land and its resources to the Task Force. Who would choose such representatives was left up in the air. It would also be important to determine whether such a group of representatives would be threatening to the Council's power of representation.

[28]There seemed to be general agreement within the BIA Fort Apache Agency that an articulated set of goals from the Tribe would be helpful in setting BIA policy more in line with Tribal values. (Nuvamsa, Reinholt)

Phase 3

Generating Alternatives and Choosing Among Them
Proposal and analysis of policy alternatives to accomplish goals by Technical Teams, Enterprise Managers and Department Directors
Circulation of written alternatives to Council, associations and public for discussion
Hearing of public comments on alternatives' ability to meet goals and alternatives' economic, social, cultural and environmental impacts
Revision of existing and proposed plans by Technical Teams
Review of statutory compliance by Task Force and Legal Staff
Council selection and approval of final list of policies in a final draft of the plan

How should the Tribe incorporate the managers into the process? One way would be to divide the Technical Teams up with the managers and directors into sub-committees responsible for developing classes of alternatives for the plan. If the sub-committees were to form along the existing divisions separating resource managers (forestry, wildlife, livestock, etc.) rather than along some other division of labor, the same conflicts that currently exist would simply re-emerge in generating alternatives. If, instead, the sub-committees broke up along topical areas rather than resource areas, say, committees covering erosion, land use or fire policy for all resources, the contemporary conflicts might be more successfully included in the process. Dividing the work this way has the drawback of making the writing of the planning document more difficult, but it does accomplish the task of integrating the resource planning, a task not often done in making resource plans.[29]

In writing the alternatives, the sub-committees will need to keep the goals in mind and make predictions of the consequences of the alternatives for the plan. The Tribal Resource Planning Office at the Flathead Reservation designed a format for these alternative proposals so that the alternatives could be compared not only on their effectiveness in accomplishing the goals, but also on other criteria such as environmental impact and economic development. (S&K, 1988, 7) Having a standard format facilitated the final presentation of alternatives to the public and Council.

Once a volume outlining the proposed alternatives has been assembled and distributed to the Council, associations and the members of the Tribe, the Task Force can hold another set of public hearings in which the public can voice their opinions about the alternatives. Going back to the public at this stage in the

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[29]The Yakima IRMP process, for example, appears to be quite comprehensive in its scope but there appears to be little integration of planning. For the Tribe to reap the economic benefit of planning it would want to make sure alternatives for development among resources are compared as much as possible.

process allows the groups who defined the goals of the process to evaluate the alternatives and to begin sorting out the conflicts between them. Invariably, the alternatives will not be able to satisfy goals without sacrificing others. Therefore, the task for the Tribe is one of satisficing goals, and the people best suited for that generally are not the technical experts who generated the policy alternatives but the public who participated in developing the goals. Once public comment has been recorded, the Task Force, in conjunction with the Technical Teams, enterprise managers and department directors, should draft a final list of plan alternatives to the Tribal Council with a summary of the public comments. When the plan is finally approved by the Council, the last stage, the stage for which the whole process should be designed, begins—implementation.

4. Putting the Plan to Work and Reviewing its Outcomes

Even though planning is complete by this stage, implementation and review are the most critical parts of the process. It cannot be stressed too much that the purpose of planning is to affect change—change in the Tribe's sovereignty, change in the Tribe's economic prosperity or change in the Tribe's institutions. For the plan not to be one more study, special attention must be devoted to the implementation of the plan. Plan policies need to be developed into guidelines for managers to follow in their day-to-day decision making. Plan goals need to be changed into evaluation and monitoring criteria so Tribal leaders can see when implementation deviates from the plan. For these reasons it is important for a new organization to supersede the Planning Task Force and the Technical Teams.

In this final stage, an organization whose main task will be oversight should take over from the Task Force and the Technical Teams. The purpose of the Task Force in the earlier phases was to handle the negotiation and logistical aspects of the process. The Technical Teams were to apply the necessary scientific and economic knowledge necessary for understanding the present and charting the future. The need at this stage is for a monitoring body that can ensure the successful implementation of the plan. It may be reasonable to disband the Task Force and Technical Teams and create a Comprehensive Plan Review Board. The Review Board would be an institution convening every six or twelve months to review the implementation process. It would have to convene for a considerable time at the first meeting to turn the

plan policies in to guidelines for the managers and directors and to transform the goals into performance standards by which to judge the success of the implementation. At the initial meeting, the Review Board could also consider how the comprehensive resource plan would interact with other plans in place. After that initial meeting, however, the group would not have to congregate for longer than it took to review statements, reports or presentations by the managers and directors about the status of the resources for which they were responsible.

Phase 4
Putting the Plan to Work and Reviewing its Outcomes
Creation of Comprehensive Plan Review Board to oversee implementation of plan by resource managers and users by Task Force
Disbanding of Task Force & Technical Teams
Creation of implementation guidelines and format of management plans to be given to BIA, Enterprises, Department Managers by · Review Board
Review of plan accomplishments and comparison with plan goals by Tribal Council and Review Board

The last stage of the plan's development and implementation should analyze to what extent the process of developing the plan and the accomplishments of the plan furthered the interests of the Tribe. Doing an analysis of this kind ensures that lessons learned in this planning process are carried forward to the plans the Tribe might develop in the next century. It is hard to make recommendations of how to go about this stage from the experience of other tribes since none have developed a plan to the point of long-term implementation. Nevertheless, there are some general qualities such a review should have. First, to what extent did the planning process create a sustainable agreement? In other words, how well did the process integrate disparate interests into the plan with sufficient compromise and agreement to make the participants feel part of a fair deal? Also, to what extent did the process create agreements where failing to comply after the plan's creation was more costly for players (in terms of social pressure, financial cost or any relevant measure) than complying? Second, was the process successful in eliciting the opinions of the Tribal membership and applying them to the formation of goals? What was public opinion about the plan once the plan had been implemented? Did the Tribal members feel the plan advanced the well-being of the tribe significantly? Their own welfare? Third, how useful was the planning process in spurring the creation of new Tribal analytic and management capabilities? Were new institutions that will usefully serve the Tribe developed in response to planning? Fourth, how well was the plan implemented? Did the changes

expected to take place in actually occur? Finally and most importantly, was planning a good use of members' time and money? Did the planning process improve the well being of the Tribe more than it hurt it? Would planning be worthwhile for the Tribe in the future?

This final discussion of review brings us back full circle to the decision to plan and the choice of a planning structure. In deliberating how the planning process will be reviewed several years down the road, the Tribal leadership will have to articulate what it hopes to get out of a plan and what process will be most appropriate for doing so. Beginning with the end in mind will help the Tribe evaluate this and other proposals for a planning process and create its own.

IV Conclusion

The process of developing a plan may encourage the Tribe to accomplish a great deal of work that is not being engaged now. Current Tribal members and other observers complain that resource use is haphazard and not in keeping with Apache values. Developing and following a resource plan could organize the Tribe's growth over the next decades. Integrated planning may also result in additional economic efficiency by comparing resource and capital allocations across resource programs. If the Tribe chose to plan for itself rather than charging consultants or the BIA with writing a plan, it could increase the pressure for the creation of new Tribal institutions capable of economic and scientific analysis and improve Tribal self-sufficiency in resource management. Furthermore, planning under the BIA's guidelines can assert Tribal sovereignty in its relations with the BIA. Most importantly, the process of developing a plan can spur the Tribe to imagine its future and direct its destiny according to its own values. An articulate vision for the future is not enough. As the Tribe faces increasing population growth and rising demands on its resources, converting that vision into real allocations can ensure that future generations of Apaches will enjoy the plenty that current Apaches do.

To accomplish this work the Tribe will have to design a planning process and planning organizations that are likely to accomplish this work. The model presented in this report is only one prototype of many possible processes and institutional arrangements. It has merits but the Tribe should consider its faults as well. It is likely to make planning integrated if the Technical Teams are established in a way that

scientists or resource managers for all the resources included in the scope are given equitable weight in the planning process. If planning is integrated and the economic impacts of the alternatives are compared, the Tribe can expect greater economic benefits from the implementation of the plan. Moreover, the arrangement outlined in this report assumes that the Tribe develops talent in the fields of resource analysis to staff the Tribal Technical Team. The assumption is justified by the Tribe's desire to be in control of natural resource planning yet it also creates an imperative that the Tribe begin phased personnel takeovers from the BIA and develop institutions of its own. Finally, the prototype proposed here addresses the formulation of issues and goals and the selection of alternatives in a way that can engender a lasting commitment to a vision once it is articulated. Including the opinions of diverse groups on the reservation can create a sense of ownership of the plan not just among the planners and managers but among the public at large. Strong public commitment is a possible outcome from this sense of ownership.

The proposed planning framework also warrants concern. For one, the success of the process is highly dependent on the Planning Task Force. Because it has to mediate disputes, solicit opinion, regulate who does the analysis, and manage the actual production of the plan, the Task Force is the keystone of the planning organizations. If worse came to worst and one of the supporting organizations was weak or incapable, the Task Force might be able to make up for the loss. The opposite does not hold true; were the Task Force to be deficient, the supporting organizations would not be able to step in its place because of inter-group jealousies or specializations.

A second concern of the proposed plan is its probable cultural insensitivities. For example, the prototype assumes that the Salish & Kootenai Tribes are a worthy model from which to draw lessons for the White Mountain Apache Tribe. It may be that the White Mountain Apache Tribe is not comfortable with the idea of a BIA Technical Team so completely integrated in the planning process. It may also be that the White Mountain Apache Tribe is uncomfortable with consensus, in general, and public comment, in particular, as bases for making decisions. The prototype put forward here is also heavily influenced by technocratic and Anglo traditions that are only partially relevant to the White Mountain Apache Tribe's situation. The Tribe is encouraged to separate the wheat from the chaff in this report and design a process sensitive to its own cultural and political traditions.

A third weakness of the prototype is that it is vulnerable to being slowed by the creation of the institutions necessary for planning. The Tribe's desire to have a Department of Forestry is nearly five years old yet there is only one Forester and no support staff. While it is not the purpose of this paper to investigate the reasons behind this slow development, it does raise threatening questions for the planning process. If the Tribe must develop its institutional capacity slowly it may want to consider either radically changing this planning process or postponing the inception of one like this one. Both options weaken one of the processes greatest advantage, spurring institutional capacity building, but the alternative may be an uncoordinated and unbalanced process. Considering to what extent institution building will be a bottleneck in the planning process will be an important first step in designing the process.

Finally, the greatest weakness of this prototype is its ignorance of current litigation. Both the mismanagement suit and the water rights suit have strategic requirements that will impinge on planning if not preclude it. Apparently, the Tribe already has rejected planning by the BIA's IRMP model because of the mismanagement suit. (Reinholt) Though it may be throwing away the baby with the bath water, BIA involvement in this prototype may have to be jettisoned if the Tribe feels it cannot engage with the BIA in making plans. This would have the effect of delaying planning while tribal capacity is developed and may disregard the opportunity for cooperation with and control of the BIA that is available in the provisions of BIAM Supplement 10. No matter what the Tribe decides to do vis-à-vis the BIA, it needs to consider the strategic needs and gains of its lawsuit and balance them against the strategic needs and gains of planning its resources effectively and incorporate both into the design of a process.

The White Mountain Apache Tribe has had a successful past that stands out from the general experience of Indian tribes in North America. Previous generations of Apaches have organized themselves effectively to extract resources from the land to provide for their families and communities. The present generation has effectively managed a dozen Tribal enterprises not only to maintain an ample Apache standard of living but to provide goods and services that are without peer to Apaches, Arizonans and Americans. This is a testament to the Apache culture and to its effective leadership.

The future, on the other hand, is not so bright. The future holds the end of the old growth forest; rising demands for recreation and resources from outside the reservation; growing population on the reservation and greater regulatory and statutory demands from the US Government. Resource planning may enable the Tribe to face these demands and keep the Apache standard of living from slipping, and it is worth the careful consideration of the Chairman, the Tribal Council and the membership. Hopefully this report will be useful in their deliberations.

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Appendix A: Figures and Diagrams

Confederated Salish and Kootenai Tribes
Comprehensive Land And Natural Resources Plan Process Phasing

Phase I Pre-Planning	Phase II Conditions, Issues* and Goals	Phase III Land Use Alternatives and Policies	Phase IV Plan Adoption and Implementation.
Examine Alternative Approaches and Establish Planning Work Program	Prepare Draft Volume 1 Including Issues, Economic Setting, Existing Conditions and Goals	Prepare Draft Volume II Including Land Use Alternatives, and Management Objectives	Establish Framework to Implement Plan Policies and Development Plans
Oct. 87-Jul. 88†	FY 89**†	FY 90**†	FY 91-2**
1. Establish Tribal vision	1. Mobilize technical team for work program approved by Council	1. Define Land Use alternatives, outputs and impacts per policy alternative: • Land Use allocation • Economic effects • Social/Cultural effects • Environmental effects	1. Adopt Comprehensive Plan‡
2. Identify scenarios for 2000	2. Establish GIS for technical support of plan design		2. Update or develop near-term implementation guidelines for each resource‡
3. Define inter-jurisdictional context and strategies	3. Establish Land/Natural Resource Classification System	2. Review alternatives with community, Council and affected, non-Tribal jurisdictions	3. Establish Land/Resources Use Clearinghouse to assure Comprehensive Plan policies are met‡
4. Define plan structure and technical elements	4. Develop plan database	3. Identify preferred alternatives	
5. Define multiple year planning process and products	5. Conduct special plan studies	4. Define land/resource policies for zones of influence	4. Revise and update economic plans to focus on commercial property development/investment within preferred areas of Comprehensive Plan‡
6. Obtain approval of planning work program and BIA role from Council	6. Analyze Tribal Economy	5. Define management objectives by category and land classification	
7. Establish relationship of plan to Land Management Plan and other regulations	7. Define issues* with community involvement	6. Conduct community and Tribal Council hearings	5. Reassess current Tribal investment and related land use policies; establish means to maximize desired return on investment for Tribe and small businesses‡
	8. Determine existing conditions in each category of resources	7. Prepare official Land Use Map	
	9. Define goals with community involvement		
	10. Prepare goals and existing conditions reports		

(Salish and Kootenai, 1988, p. 4; 1990, p. 10; Dupuis, 1/27, 3/13)
*Issues were defined to be those areas which a plan should include in its scope e.g. annual allowable cut, grazing rights, cultural heritage etc.
** planned
† actual
‡ Virtually all of this column was changed between 1988 when the first grant application was written and 1990 when the second one was. The main reason was to accommodate the change from a fairly specific allocation document to a more general plan of guidelines for resource managers.

Figure 1

41

Institutional Relations in the Planning Process of the
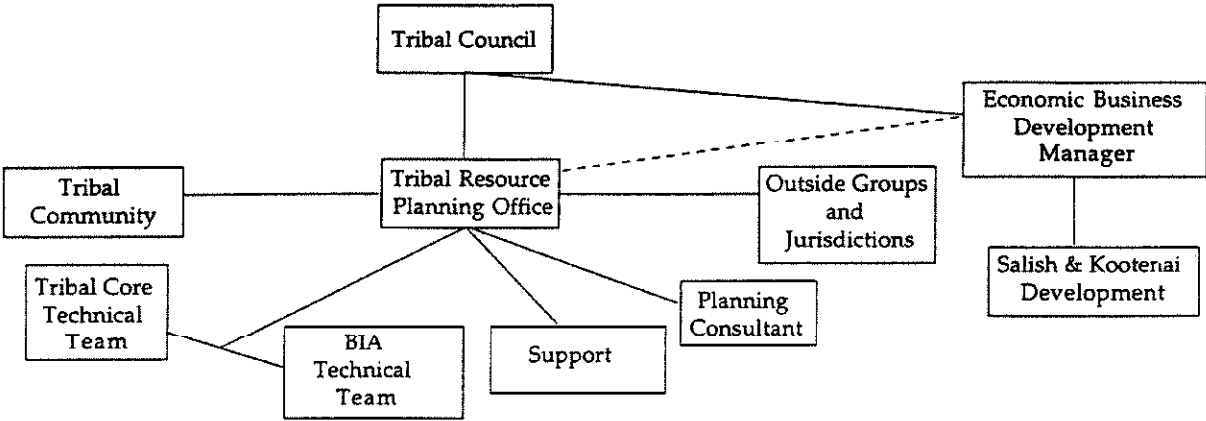
Confederated Salish & Kootenai Tribes

Figure 2

A Prototype for a Phased Planning Process for the
White Mountain Apache Tribe

Phase 1	Phase 2	Phase 3	Phase 4
Deciding to Plan and Creating a Planning Process	Evaluating the Present and Choosing a Future	Generating Alternatives and Choosing Among Them	Pulling the Plan to Work and Reviewing its Outcomes
Review of planning principles and discussion of merits of planning by Council, Directors and Managers	Draft of scope of issues to be included by Council and Task Force with Legal Department	Proposal and analysis of policy alternatives to accomplish goals by Technical Teams, Enterprise Managers and Department Directors	Creation of Comprehensive Plan Review Board to oversee implementation of plan by resource managers and users by Task Force
Formation of Planning Task Force by Council, Directors and Managers	Creation of Tribal and BIA Technical Teams by Task Force	Circulation of written alternatives to Council, associations and public for discussion	Disbanding of Task Force & Technical Teams
Assessment of Tribal institutions needed for planning and definition of plan process, time frame, planning participants and roles, staffing and budgeting needs, sources of funding, plan's relation to existing plans and Memorandum of Understanding with BIA by Task Force	Development of additional Tribal institutions by Council and Task Force	Hearing of public comments on alternatives' ability to meet goals and alternatives' economic, social, cultural and environmental impacts	Creation of implementation guidelines and format of management plans to be given to BIA, Enterprises, Department Managers by Review Board
	Assessment of data needs and current conditions by Technical Teams	Revision of existing and proposed plans by Technical Teams	Review of plan accomplishments and comparison with plan goals by Tribal Council and Review Board
	Hearing of public opinions about issues and goals for the plan in the four districts by Task Force	Review of statutory compliance by Task Force and Legal Staff	
Review and approval of planning process, institutional design, funding and MOU by Tribal Council	Writing of final report evaluating existing conditions and outlining goals by Task Force and Technical Teams	Council selection and approval of final list of policies in a final draft of the plan	

Figure 3

43

A Prototype of Institutional Relations in the Planning Process of the

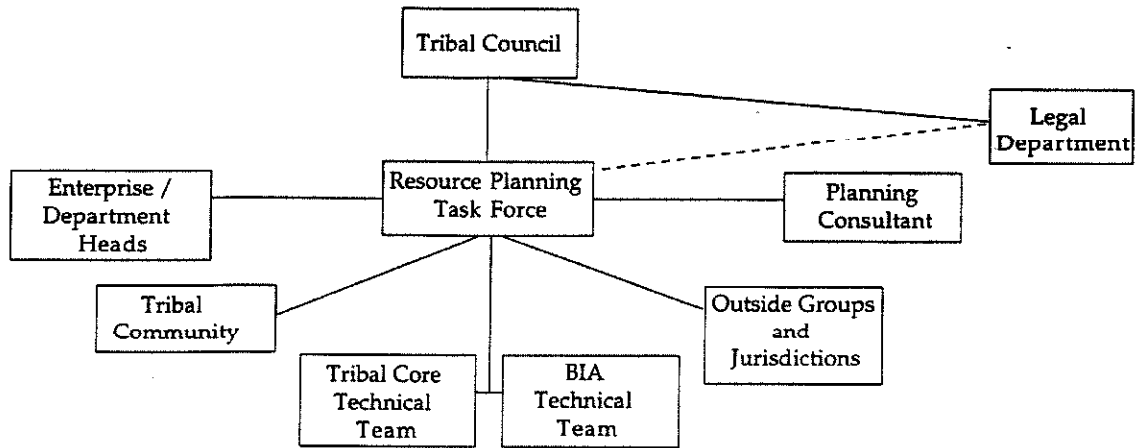# White Mountain Apache Tribe

Figure 4

Appendix B: Institutions of the Salish & Kootenai Tribes' Planning Process

As mentioned before, the Salish and Kootenai Tribes adopted a planetary scheme for organizing their planning with a Tribal Resource Planning Office as the sun and seven or eight groups and individuals as planets. The Tribal Resources Planning Coordinator found this planning structure necessitated many meetings and placed an extra burden on the Planning Office to make sure reports were written according to the specified format. (Dupuis, 1/27) Nevertheless, the structure required little new institutional capacity by taking advantage of existing resources and adding the expertise of the consultant.

Within the system, which is perhaps best illustrated as it was in Figure 2 in Appendix A (repeated below), political will and values, technical expertise, outside opinions and economic development goals were reconciled and compiled by the Tribal Resource Planning Office. Political interests come primarily from the Tribal Council which presides over the Salish & Kootenai Tribes' bureaucracy and from the general public whose opinions are solicited in hearings. Scientific, legal and planning expertise comes from the Technical Teams, the Planning Consultant and the Support staffs. Outside groups and jurisdictions express their concerns about interactions with their plans via hearings held by the Planning Office and continuous communications with it. Economic development issues and conflicts are reconciled via direct inter-agency contact between the Natural Resources Department and the Economic Business Development Manager.

Planning Structure Used by
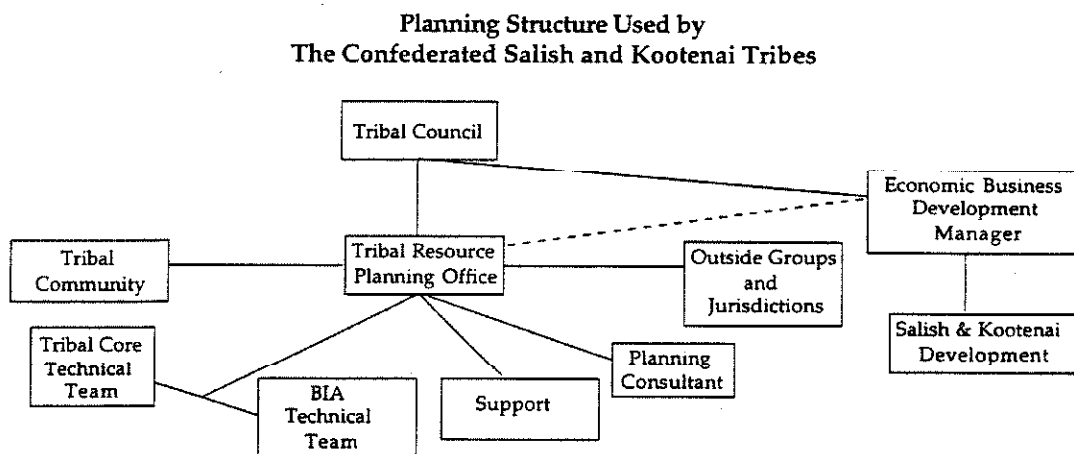The Confederated Salish and Kootenai Tribes

Figure 2

The division of labor among these groups was carefully laid out by the planning staff before beginning

Phase II (Defining the Scope and Goal Setting). Starting in the center of the diagram above and working

around counterclockwise from the left the duties for each group are as follows:

Tribal Resources Planning Office
    a. Coordinate administrative and technical components of planning.
    b. Serve as technical liaison between Tribal and BIA Technical Teams.
    c. Serve as liaison between "affected and participating parties"(see below) and the Tribes.
    d. Coordinate community meetings to define issues and goals and review existing conditions.
    e. Prepare major documents of the plan.
    f. Coordinate consultant's assistance to the Tribes.
    g. Coordinate support staffs.

Tribal Core Technical Team
    a. Prepare information for and participate in working meetings for defining issues, goals, conditions, alternatives and proposed policies.
    b. Assist in defining scope of technical areas of plan.
    c. Assist in preparing technical elements of plan and conduct analysis according to guidelines provided by the consultant.
    d. Interpret existing studies, plans and ordinances as they pertain to the structure of the proposed comprehensive land use plan and provide updated analysis of these studies, plans, and other ordinances.
    e. Specify mapping and analytical requirements for the Geographic Information System(GIS).

BIA Technical Team
    a. Provide technical support and interpretation of trust responsibilities and BIA functions as they pertain to the plan and within the guidelines specified in the Memorandum of Understanding.
    b. Prepare materials for and participate in working sessions on issues, goals, existing conditions, use alternatives and proposed policies.
    c. Assist in coordinating the interface of BIA GIS hardware and software with the Tribes' applications.
    d. Provide data, maps and analysis to assist in preparation of Volumes I and II.

Land Use Planning Consultant
    a. Prepare a technical paper on the proposed scope of plan.
    b. Assist Tribes in developing up-to-date land and natural resource classification system and in outlining the boundaries of management zones.
    c. Provide a detailed list of data requirements for the plan and conduct a working session on data and mapping needs including GIS.
    d. Provide training to staff and technical teams on planning baseline data analysis and utilization of GIS and interface with BIA GIS.
    e. Assist Tribes in developing data profiles of all resource and land use categories.
    f. Establish requirements for economic analysis and business profiles.
    g. Prepare and facilitate working sessions on the definition of issues, goals, and inter-jurisdictional policy concerns.
    h. Provide a detailed structure for Volumes I and II including detailed formats and guidelines for analyses and policy statements.

Other Affected and Participating Parties[30]
   a. Participate in working sessions on plan issues, goals, and long-term policies.
   b. Provide input to the Tribes on the relationship of the existing or adopted jurisdiction plans or policies and the proposed tribal plans or policies.
   c. Provide information related to social, economic, land status and resource category profiles as requested by the Tribes.
   d. Review impacts of proposed long-term Tribal planning goals and policies as requested by the Tribes. (S&K, 1988, 5-9)

Economic Business Development Manager and S & K Developments[31]
   These two institutions are responsible for planning and developing commercial property owned by the Tribes. Their inclusion in the planning process is justified by their functions of 1)updating economic plans to focus on commercial property development within preferred areas of the comprehensive plan and 2) reassessing Tribal investment to maximize returns for the Tribes and member-owned businesses. (S&K, 1988, 16)

Within the Tribal Resource Planning Office, there were three full-time employees working on the

planning process directly. Led by the Resources Planning Coordinator, the staff included a resources planner,

a Planning Technician and a part-time secretarial and GIS support form the Tribes. Since the Planning

Office is housed in the Natural Resources Department, the Department Head contributed some of her time

as well. Although only two full-time positions were funded, these full-time planning positions were

proposed Phase II as follows:

Position	Phase	Duties[32]
Resources Planning Coordinator	II.	Conduct working sessions with technical teams, Tribal Council and Tribal members at community levels to establish issues and goals. Complete Volume I. Mobilize comprehensive land use team, establish detailed scope of plan and interagency arrangements for tasks. Prepare baseline data and develop structure for GIS.
	III.	Prioritize management objectives by land classification considering all resource categories. Conduct Council and community hearings on objectives and alternatives. final adoption of plan. Define land use alternatives and expected economic, social, environmental and cultural impacts arising from present and future land allocations. Identify preferred alternatives.

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[30]These "Other Affected and Participating Parties" consisted of forty or more organizations and institutions including five state departments, four counties, eleven cities and towns, three National Forests, four companies, several federal and state agencies and four special interest groups. Obviously with little fee land to speak of, the WMAT would not have to contend with so many outside parties.

[31]Added as players between Phase II and IV. S & K Developments is a development corporation wholly owned by the Tribes.

[32]Duties are listed in order of time commitment by phase.

	IV.	Develop and adopt standard format for Tribal and BIA management and development plans such as ten year forest management plan. Develop monitoring system for plan administration.
Planner I	II.	Prepare updated analysis of Tribal and regional economic setting. Conduct studies to establish commercial/industrial and socioeconomic profiles as well as major transportation corridor impacts. Prepare baseline data and develop structure for GIS
	III.	Same as Coordinator but with greater emphasis on defining alternatives.
	IV.	Same as Coordinator with addition of preparation of five year economic plan.
GIS Technician	II.	Prepare baseline data and develop structure for GIS
	III.	Prioritize management objectives by land classification considering all resource categories. Conduct Council and community hearings on objectives and alternatives. final adoption of plan. Define land use alternatives and expected economic, social, environmental and cultural impacts arising from present and future land allocations. Identify preferred alternatives.
	IV.	Develop monitoring system for plan administration. Prepare five year economic development plan
Planning Technician		Assist Resources Planning Coordinator, Planner I and GIS Technician throughout all phases.
Planning Secretary		Secretarial support for all phases of the project.

(S & K, 1988, 11-2,24-45)

INTEGRATED RESOURCE MANAGEMENT PLANS
General

1. GENERAL

1.1 Policy. It is the policy of the Bureau of Indian Affairs to encourage Indian tribes to become more knowledgeable about Bureau activities, and to plan and administer Federal programs on Indian reservations. The management of the natural resources on Indian lands is encouraged by, and in accordance with, a current Integrated Resource Management Plan (IRMP), hereafter referred to as the "plan".

Plan format must be in conformance with this manual supplement, which has been specifically formulated to satisfy the revised Departmental policies and procedures for compliance with the National Environmental Policy Act (NEPA) (42 U.S.C. 4321). This policy has been developed to comply with the mandate of Section 102 (2)(A) of NEPA, to utilize a systematic, interdisciplinary approach. It will ensure the integrated use of the natural and social sciences and the environmental design arts in planning and decision making.

The plan is not considered current until approved by the Area Director in accordance with delegated authority in 10 BIAM. It remains current only during the period designated at approval, or as provided through formal extension by the Area Director.

Plans should span no more than one management cycle and normally will be limited to a ten year period, which should correspond to data collection or inventory of the primary resources. The collection of inventory data utilized in the plan, shall be completed prior to organization of the planning team.

In order to provide for the development of a quality plan, allow for timely plan modifications, and ensure ease of plan implementation, the Bureau's Geographic Information System (GIS) should be utilized during plan development. The availability of digital spatial data shall be evaluated as a routine part of the planning effort. All spatial data shall meet the standards established by the National GIS Coordinator, and will be compatible with the Bureau's Indian Integrated Resource Information Program (IIRIP).

It shall be the responsibility of the respective tribal and/or Bureau program (i.e., forestry, agriculture, minerals, etc.) to arrange funding for required inventories, as well as the incorporation of their respective data into the GIS data base.

1.2 Scope. The plan will encompass all trust and restricted land ownerships (i.e., tribal, and allotted). The determination and implementation of resource utilization practices shall be limited to lands under the jurisdiction of the Bureau of Indian Affairs.

INTEGRATED RESOURCE MANAGEMENT PLANS
General

1.3 Authority. It is the responsibility of the Agency
Superintendent, and the duty of resource managers, to ensure the
acquisition and maintenance of an approved plan that is responsive to
tribal goals and objectives. The Agency Superintendent shall strive
to secure plan approval by the tribal governing body. Should tribal
approval not be obtained after a prudent period of time and effort, or
after consideration of written objections to the plan, the Area
Director may approve the plan to protect valuable resources. In
effect, this will be exercising the Bureau's trust responsibility.

Once the plan has been approved, the Bureau shall support only those
resource related activities which are within the scope of the plan's
preferred alternatives.

1.4 Content. An IRMP defines the resources of value, documents
issues and concerns, evaluates management alternatives, and identifies
a preferred alternative which is responsive to the Indian owner's
goals and objectives. The plan, as identified in this supplement,
will satisfy the mandates of NEPA (40 CFR Ch. V), and facilitate the
Bureau's trust responsibility in harmony with tribal self-
determination.

At a minimum, an IRMP will contain the following:

    1. Introduction (Executive Summary, Purpose, Need, etc.).

    2. Description of the Affected Environment.

    3. Issues and Concerns.

    4. Goals and Objectives.

    5. Management Alternatives and Environmental Consequences.

    6. Alternatives recommended by the planning team.

    7. Preferred alternatives selected by tribe(s) and Bureau.

    8. A Finding of No Significant Impact (FONSI), or a Notice
       of Intent (NOI) to prepare an Environmental Impact
       Statement.

    9. Documented Public Involvement.

A separate Environmental Impact Statement is necessary and shall be a
companion document to the IRMP, only when a Notice of Intent (NOI) has
been issued. The Environmental Impact Statement (EIS) shall conform
to 30 BIAM Supplement 1, Section 6.

INTEGRATED RESOURCE MANAGEMENT PLANS
Development Procedures

2. DEVELOPMENT PROCEDURES

2.1 _General_. It is Bureau policy to actively seek the assistance of the tribe(s) in preparation of Integrated Resource Management Plans, not only for the determination of goals and objectives, but for the technical expertise of tribal employees and individuals (e.g., cultural, socio-economic, etc.). The following describes the process for development of an IRMP.

   A. _Determination of Need_. The first step in the process of integrated resource management planning is the determination of need. This can occur as the result of: (1) various program or administrative reviews; (2) an immediate concern or controversial issue; (3) a procedural mandate; (4) a unique economic opportunity; or (5) a change in governmental policy (tribal or federal). The planning process can be initiated by either the tribe(s) or the Bureau, but should immediately include the participation of both.

   B. _Organizational Meetings_. One or more organizational meetings shall be held after the need for planning has been determined. It is essential that tribal, agency and area office staffs be involved. During these meetings the following information shall be identified:

   1. Short and long term goals (general direction of management relative to important resources).

   2. Scope of the project (what resources and activities will be involved).

   3. Geographic area of consideration.

   4. Identification of data which is currently available, and determination of need to up-date information.

   5. Source, quality, and limitations of data.

   6. Disciplines required on the planning team and potential team members.

   7. Projected time required for data collection and GIS data base development.

   8. Projected completion date of the plan.

   9. Tribal, Bureau and other involvement.

   10. Determination of affected public (residents, land owners, other land users, etc.).

INTEGRATED RESOURCE MANAGEMENT PLANS
Development Procedures

11. Methodologies of public involvement.

12. Costs estimates for developing the plan.

13. Sources of funding.

The organizational meetings will generate various documents,
including:

1. Memorandum of Understanding signed by all organizations
   taking part in the development of the plan (reference
   Illustration 4).

2. Listing of resources that are of value to the tribe.

3. Listing of resource management goals and objectives.

4. Listing of potential interdisciplinary team members.

5. Methods of public involvement.

The planning team leader shall be appointed as early as possible to
assist in organizing, scheduling and documenting results of
organizational meetings.

   C. Scoping. Scoping sessions shall be conducted with tribal
leaders and staff specialist, Bureau personnel, local residents, and
involved land users such as lessees, contractors, associations and
land owners. The scoping session may either be conducted jointly,
with all team members on site at a scheduled time, or team members may
make arrangements for individual scoping sessions over a period of
several weeks. In addition to interviews, team members shall review
all pertinent resource plans, reports and files. It is the
responsibility of each team member to document program goals,
objectives, issues and concerns, and identify resource data which may
be incomplete or missing for their subject area of expertise. During
the scoping process, team members shall also collect information to
document the Description of Affected Environment (reference section
3.13).

   D. Resource Analysis. Following the scoping process, a resource
analysis workshop shall be conducted, in which, the planning team
shall discuss the findings of the scoping session. The objective of
this workshop is to refine and focus on the goals, issues and concerns
and to formulate appropriate individual resource analysis strategies.
A schedule shall be established for individual team members to work
with the Area GIS Coordinator to design and develop cartographic and
tabular data products utilized in the analysis process. Outputs from
this meeting shall be used in parts B, C, and D(2) of the plan
(reference Illustration 3).

INTEGRATED RESOURCE MANAGEMENT PLANS
Development Procedures

E. **Alternative Development**. Following resource analysis, an
alternative development workshop shall be conducted. The objective of
this workshop is to: (1) identify management alternatives; (2) discuss
impacts of various management strategies; (3) recommend an alternative
for each primary resource use; and (4) identify needed refinements to
the cartographic and tabular data products. Outputs from this meeting
shall be used in parts E and F of the plan (reference Illustration 3).

F. **Consolidation and Review of Draft**. The planning team leader
shall consolidate the plan into a formal document, and copies shall be
distributed to the contributing authors for critique.

G. **Alternative Selection**. Following review of the draft plan,
tribal and Bureau officials shall meet to select a preferred
alternative for each primary resource use. Following a public comment
period, the plan, with preferred alternatives and comments, shall be
referred to the Tribal Council for adoption through a formal
resolution. After adoption, the preferred alternatives shall be
documented in the Executive Summary and Alternative Selection portions
of the plan (reference parts A.1 and G of Illustration 3).

H. **NEPA Review**. As the plan itself comprises an Environmental
Assessment, a determination shall be required as to the further need
for an Environmental Impact Statement. This determination shall be
made by the Area Director. The Area Director may obtain the advice or
guidance of the Area Environmental Coordinator or may request
additional information from the planning team. Should the Area
Director determine there is no significant impact, he shall document
his decision in a Finding of No Significant Impact (FONSI). Should
the Area Director determine an Environmental Impact Statement is in
order, he shall document his decision in a Notice of Intent (NOI), and
proceed in accordance with 30 BIAM Supplement 1, Section 6.

I. **Plan Approval**. Once the provisions of the National
Environmental Policy Act have been met, the plan may be approved with
the signatures of the Tribal Chairman and the Area Director.
(reference Illustration 1)

3. PLAN CONTENT

3.1 __General__. The IRMP, when approved, is a reservation specific management agreement between the tribe(s) and the Bureau. As such, the document must describe, evaluate, recommend, and establish acceptable resource management strategies.

The plan shall consist of two parts; a narrative and an atlas. An outline for the narrative is provided in Illustration 3. All new plans and revisions of existing plans, shall follow the form summarized herein and outlined in Illustration 3. Waiver of this requirement will be considered by the Deputy Assistant Secretary only when requested in writing with an explanation of how the requirements of 25 CFR and the National Environmental Policy Act will be met. Inclusions of additional topics to meet Area, Agency and Tribal needs are permitted.

Minimum content of the plan narrative is described as follows:

A. __Introduction__. The introduction describes the organization of the plan and provides the reader with an understanding of plan content and format. It shall consist of the following:

(1) __Executive Summary__. The Executive Summary shall contain a brief synopsis of the issues and concerns, as well as the goals and objectives. Following tribal adoption of the preferred alternative for each primary resource use, a brief synopsis identifying the preferred alternatives shall be included in the Executive Summary. (Reference section 2.1G)

(2) __Preface (Purpose and Need)__. The preface shall be a brief statement which expresses the objective and scope of the plan. It includes the purpose of, and need for the plan, the term of the plan, when development began, authority (tribal and federal), what the plan is designed to accomplish, area of consideration (ownership, resource), major constraints and other background information that may prepare the reader to better understand the plan's content. As the plan itself comprises an Environmental Assessment, it is essential that the preface explain that the National Environmental Policy Act has been considered by combining both plan and Environmental Assessment, as authorized by 40 CFR parts 1500.4(o), 1500.5(i), and CEQ Regulation Section 1506.4.

(3) __Acknowledgements__. The Acknowledgement is a documentation of names, titles and organizations of planning team members and others involved in the planning process.

(4) __Table of Contents__. The Table of Contents provides a concise, topical reference in outline form. An index of maps, tables, figures and illustrations shall also be included as a separate page.

INTEGRATED RESOURCE MANAGEMENT PLANS
Plan Content

B. <u>Description of the Affected Environment</u>. The environmental description identifies the current condition of the reservation or area covered by the plan. It details the extent and present value, in tangible terms, of major resources considered by the plan, as well as forecasts for future values of these resources. Intangible values of the reservation's innate resources are also described (e.g., cultural, traditional, recreational, etc.). The description shall include the following:

(1) <u>Reservation Setting</u>. Describe the physical attributes of the reservation with a minimum of narrative. The description should include location, geology, topography, climate and ownership patterns. This portion of the plan should reference one or more descriptive maps, included in the plan atlas.

(2) <u>Resources</u>. Discuss present and potential use for all resources which were identified during the organizational meetings and scoping sessions, as having value to the tribe(s). Examples include:

Timber	Agriculture
Range	Recreation
Wildlife	Archaeology/Historical
Hydrology	Cultural/Traditional
Fisheries	Socio-Economic
Soils	Threatened/Endangered Species
Minerals	Others

C. <u>Issues and Concerns</u>. Various issues and concerns, identified during the scoping process, may be consolidated for a single resource. All major issues shall be discussed in a concise manner.

D. <u>Goals and Objectives</u>. Goals and objectives establish the direction and principles under which reservation programs shall be managed. Each of the following shall be discussed:

(1) <u>Statutory Objectives</u>. A statement of plan compliance with NEPA, the Endangered Species Act, Archaeological Resources Protection Act, National Historical Preservation Act, and other pertinent statutes is required.

(2) <u>Management Goals</u>. Management goals which were identified by either the tribe(s) or the Bureau during the organizational meetings and/or scoping process must be consistent with statutory objectives and state-of-the-art resource management techniques. Management goals will be identified for each primary resource use which has been determined to be of value. The term "resource use" is given to a management philosophy that may be applied to a given area of the reservation with like resource priorities. For example, the management goal for the recreation resource use will state level of intensity and enhancement of recreation values, and degree of utilization or protection of other resources within the "recreation area". Resource uses are normally derived from a composite of like or compatible resource issues or concerns.

E. <u>Management Alternatives and Environmental Consequences</u>. This section serves as the summary of the environmental considerations in compliance with 516 DM 3.5B. It shall include the following:

(1) <u>Need</u>. A brief statement of need shall be developed for each primary resource use for which alternatives are being developed (reference 30 BIAM, Supplement 1, Section 4.3 C).

(2) <u>Summary of Alternatives</u>. The summary of alternatives shall consist of a brief narrative with maps and tabular data for each viable alternative and a topical matrix comparing resource policy by alternative. Estimates of tribal and Bureau support required to implement each alternative, shall also be included (i.e., staffing, major equipment, and funding requirements).

(a) <u>Alternative I</u>. Alternative I shall always be a description of management policy as it presently exits (No Action/No Change). Current resource use and values shall be projected for the term of the plan. By using adequate cartographic and tabular data, this information shall be presented with a minimum of narrative.

(b) <u>Following Alternatives</u>. Each viable alternative shall be described and compared with Alternative I, explaining changes in policy, projected uses, values and support requirements.

(3) <u>Environmental Consequences (Impacts) Summary</u>. A summary of impacts shall identify environmental consequences, including strengths and weakness, and impacts to other programs and resources. The summary shall be a matrix of alternatives, displaying projected impacts to resource concerns as compared to Alternative I. Impacts can be described in subjective terms (i.e., improve, degrade, enhance, maximize), or rated numerically ($+3, +2, +1, 0, -1, -2, -3$). (reference CEQ regulation 1502.16)

(4) <u>Contributing Individuals</u>. It is essential to document public involvement. Names, titles, and organizations of team members and individuals providing comment should be recorded. Document methods used to secure comment for each primary resource use (reference 30 BIAM supplement 1, Section 4.3C). Public comments should require minimal space as most will be referrals to the Supporting Data portion of the plan (reference section 3.1I).

F. <u>Recommended Alternative</u>. The alternative which the planning team determines to best satisfy tribal and Bureau goals for each primary resource use, shall be designated as a "Recommended Alternative". The planning team's supporting justification for their recommended alternatives shall be included in this section. The justification shall consist of the following:

(1) Matrix Analysis. The means by which a recommended alternative was derived shall be explained with the use of a matrix analysis. Interdisciplinary interaction and efforts to avoid bias shall also be noted.

(2) Methodologies of Prioritizing Values. Since different resources may have different relative value to the Indian land owner, it may be necessary to weight or prioritize resources as to relative importance. An explanation of the procedure used shall be brief.

G. Alternative Selection. After reviewing the planning team's recommended alternatives, tribal and Bureau officials shall select a preferred alternative for each primary resource use. Once the preferred alternatives have been adopted by tribal council resolution, they shall be documented in this section of the plan. (reference section 2.1G)

H. NEPA Documentation. Either a Finding of No Significant Impact (FONSI), or a Notice of Intent (NOI) to prepare an Environmental Impact Statement shall be included with the plan. (reference section 2.1H)

I. Supporting Data. A file shall be established in which reference material is maintained. As its volume is essentially unlimited, it may be kept in a file separate from the IRMP. At a minimum, it shall include the following:

1. Originals of NEPA documents, tribal resolutions, and Memorandums of Understanding.

2. Explanation of procedures used to secure public involvement and all written input or comments provided by the public.

3. Explanation of how issues were identified and a listing of all issues and concerns before consolidation.

4. A listing of all alternatives discussed regardless of viability.

5. Titles and locations of previous management plans.

6. Literature References.

7. General correspondence related to development of the IRMP.

8. Annual reviews, program reviews and plan addendum.

INTEGRATED RESOURCE MANAGEMENT PLANS
Implementation and Review

4. IMPLEMENTATION AND REVIEW

4.1 Implementation. It is the responsibility of appropriate Bureau and tribal line officers to ensure the selected IRMP management alternatives are implemented. The Agency Superintendent shall be responsible for development of action plans for various programs and activities affected by the IRMP. These action plans shall ensure the objectives of the IRMP are properly considered during development of various programs and projects, budget formulation and execution plans, annual work plans, employee performance standards, etc.

4.2 Annual Review. Plan reviews will be conducted annually by the Agency Office. Reviews shall briefly examine current issues, determine validity of the selected alternatives, document corrective action where necessary, and record progress of plan implementation. The Superintendent shall chair the review and minutes shall be recorded and maintained in the Supporting Data file (reference section 3.1I). Tribes are encouraged to participate during annual IRMP reviews. Plan addenda resulting from these reviews shall be documented, adopted by tribal council resolution, and approved by the Area Director (reference Illustration 2).

4.3 Program Review. The Central Office shall conduct periodic program reviews of IRMP's and their implementation. These program reviews shall provide a means of evaluating Bureau performance in management of trust resources. The objective of the program review is to: (1) determine adequacy of plans; (2) determine if selected alternatives have been properly implemented; (3) determine if management resources (funding, staffing, etc.) are sufficient to implement the selected alternatives; (4) determine if the selected alternatives are reasonable, in light of tribal/Bureau program priorities and the competition for limited management resources; and (5) determine the need for changes in Bureau direction, policy and management practices.

MEMORANDUM OF UNDERSTANDING

BETWEEN

THE BUREAU OF INDIAN AFFAIRS,
_____ AGENCY

AND

THE _____ INDIAN TRIBE

FOR

DEVELOPMENT OF THE _____ RESERVATION
INTEGRATED RESOURCE MANAGEMENT PLAN

This Memorandum of Understanding (hereafter referred to as the "Agreement"), is for the purpose of developing an Integrated Resource Management Plan (hereafter referred to as "IRMP" or the "Plan") for the _____ Indian Reservation.

Item 1. PRINCIPAL PARTIES. This Agreement is between the Bureau of Indian Affairs, _____ Agency (hereafter referred to as the "Bureau"), and the _____ Tribe (hereafter referred to as the "Tribe").

Item 2. PURPOSE AND INTENT. The purpose of this Agreement is to stipulate the general terms and conditions which shall establish an interdisciplinary planning team, as well as develop and implement the _____ Reservation Integrated Resource Management Plan. It is the intent of both the Tribe and the Bureau, to provide for the cooperative development of long-term resource management policies, which shall ensure direction and stability for sustained growth of reservation economies, compatible with traditional values.

Item 3. AREA OF CONSIDERATION. The Plan shall address resources of value on all trust lands within the boundaries of the _____ Reservation.

Item 4. ORGANIZATION. The planning team will be composed of the best expertise available in the fields of natural and human resources. Team participants shall consist of both Tribal and Bureau personnel, as well as specialists from other organizations, if needed. The assistance of other Tribal and/or Bureau staff specialists, not on the team, may be required to assist a member of the planning team, in development of specific portions of the plan.

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Team operations will be coordinated by a team leader. In addition to being responsible for the satisfactory completion of the Plan, the team leader shall:

1. Schedule Tribal/Bureau meetings, team meetings and scoping sessions.

2. Ensure results of the meetings and scoping sessions are properly documented.

3. Coordinate data base development with Tribal and Bureau program managers.

4. Assist the Tribe and Bureau in determining the specialty positions required on the planning team and selection of personnel to fill those positions.

5. Serve as a liaison between the planning team and the Tribe, Bureau, and other involved organizations.

6. Ensure team members are focusing on the goals, issues and concerns identified during organizational meetings and the scoping process.

7. Review individual team member reports for completeness and accuracy, and consolidate reports into the formal IRMP document.

8. Assist Tribal and Bureau officials in selection of preferred alternatives, arrange for formal review and comment period, prepare a draft resolution, and present the resolution, plan, preferred alternatives and comments to the Tribal Council for adoption.

9. Finalize the Plan and prepare NEPA documentation (FONSI or NOI) for review of the Area Director.

10. Obtain Tribal and Bureau approval signatures for the Plan.

11. Arrange for printing and distribution of the IRMP and atlas.

Item 5. AVAILABILITY OF DATA. The parties to the Agreement shall make all data, which they possess, available for development of the Plan. To the extent possible, relevant data shall be entered into the Bureau's Geographic Information System (GIS). Data which any party to the Agreement considers to be sensitive in nature, shall have restricted access within GIS. In order to facilitate the development and use of the GIS data base, the Bureau's Area GIS Coordinator shall be designated as a technical member of the planning team.

Team operations will be coordinated by a team leader. In addition to being responsible for the satisfactory completion of the Plan, the team leader shall:

1. Schedule Tribal/Bureau meetings, team meetings and scoping sessions.

2. Ensure results of the meetings and scoping sessions are properly documented.

3. Coordinate data base development with Tribal and Bureau program managers.

4. Assist the Tribe and Bureau in determining the specialty positions required on the planning team and selection of personnel to fill those positions.

5. Serve as a liaison between the planning team and the Tribe, Bureau, and other involved organizations.

6. Ensure team members are focusing on the goals, issues and concerns identified during organizational meetings and the scoping process.

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Item 6. FUNDING. All salary, travel and training cost, associated
with the development of the Plan, shall be borne by each individual's
respective organization (i.e., Tribe, Bureau, other). This includes
both team members and participation of other staff.

It shall be the responsibility of the respective Tribal and/or Bureau
programs (i.e., forestry, agriculture, minerals, etc.) to arrange
funding for required inventories, as well as the incorporation of
their respective data into the GIS data base.

Item 7. PLAN STRUCTURE AND PROCEDURES. This Agreement is limited to
the development of an Integrated Resource Management Plan as detailed
within 30 BIAM Supplement 10.

Item 8. PLAN IMPLEMENTATION. Following completion of the Plan, the
parties to this Agreement shall immediately meet to prepare and
initiate an action plan, as described in 30 BIAM Supplement 10, for
implementation of the objectives and policies of the IRMP.

Item 9. AMENDMENTS. This Agreement may be modified by amendment at
any time, with the mutual consent of the Tribal Chairman and the
Agency Superintendent.

Item 10. TERM OF AGREEMENT. Unless terminated or extended by
amendment, this Agreement shall continue in force until either
completion of both the IRMP and implementation action plan, or until
_____, 19__, which ever comes first.

Agreed: _____, 19__   Agreed: _____, 19__

_____   _____
Chairman,   Superintendent,
_____ Tribe   _____Agency Office
by Tribal Resolution No. ___

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