

Now that you have met our panel I would like to start with a discussion about the philosophy about how the handbook was revised, and I think it would help to know where the operating assumptions came from so that will help us understand why some of the things got in the handbook. So, Ted, could you start with telling us a little bit about why did the BLM finally decide to revise this handbook?

>> T. Milesnick: I think one of the main reasons was the age of the handbook being 20 years old and it doesn't really reflect the NEPA environment we currently work in. That was probably the main overriding factor.

>> M. Conry: I would echo that. There are so many new folks coming into the Bureau, new folks doing NEPA work, while lot of the policy and guidance is housed in institutional memory with staff regarding case law or all of the scattered policy from instruction memorandums and IBs, for those new folks who may not know where to look for that extraneous guidance, having a handbook that's out of date was really hard, and I think that having the new stuff all together in one spot is really beneficial.

>> R. Hardt: I think we wanted to produce a process that's more efficient.

>> C. Humphrey: That sounds kind of like a guiding principle. Did you have other guiding principles?

>> R. Hardt: Yes, when I say effective, I think one of the primary things we wanted was to have it be more effective at producing a sound decision.

>> T. Milesnick: Too, I think, we wanted to have it focus on NEPA requirements, not the requirements of some other authorities that we often kind of intermingle with our NEPA

requirements. We're trying to separate those out.

>> M. Conry: And while focusing strictly on the NEPA requirements and with the goal of working toward better decisions, we wanted to emphasize critical thinking. We understand there's a lot of comfort with check lists and templates but sometimes that comes with the cost of thinking through each problem individually.

>> R. Hardt: But at the same time we want people to do a lot of thinking, we wanted to make the kind of determinations people make to be more objective. For example, what's a reasonable alternative? What impacts are significant? We wanted to try to make clear what those thresholds are.

>> C. Humphrey: So taking out the guesswork and giving them some criteria.

>> R. Hardt: Right.

>> C. Humphrey: That's great.

>> T. Milesnick: I think also one other point we wanted to establish a mechanism for where people could go to get additional information and that kind of spurred the creation of our NEPA web guide that works in conjunction with the handbook and hopefully we'll have that up and running before too long.

>> M. Conry: We have two goals with the handbook. I mean, there's the provision of references through the web guide, all the extra material that's out there, but we also wanted to create a reference that helps people move through the NEPA process. So much of what's been written about NEPA talks about the law or the regulations from more of a philosophical standpoint and we felt it was important to give the users a guide in terms

of how to navigate the process when you're sitting there at your computer.

>> R. Hardt: And that's why in the handbook a lot of the examples we give we tried to make these examples from very typical BLM actions.

>> C. Humphrey: Yeah, that's helpful.

>> T. Milesnick: I --

>> R. Hardt: There was one thing that was particularly important in the process we went through in producing this is that we didn't want to create any new requirements. If we say something in the handbook that we must do it, we wanted to be able to trace back to the Departmental manual or the CEQ regulations or law itself as a basis for why we must do this.

>> C. Humphrey: That's an important point. So you didn't just make up this stuff. It's all based in law, regulation, policy. Good. Anything else so how was the team made up and what was the process that you followed?

>> T. Milesnick: I think the primary consideration was that we wanted to get a good cross section of BLM users, and so we were looking to get representation from both management, BLM Field Managers, as well as staff who are actually preparing the documents, and then we also wanted to get a good representation of all levels from the field level through the state office and including Washington Office, and we did concentrate on the field level staff just to make sure that the field users were well represented in the handbook, and then finally, Cathy, we wanted to get a solicitor on our team just because of the implications for our NEPA processes that stem from litigation and court rulings and so we were fortunate to have solicitor participation as an actual team member, not just as a reviewer and that was

very helpful in the process.

>> M. Conry: As Ted indicated, we had a wide variety of staff and management actually on the handbook team, and I know myself I was on the handbook team with very little practical NEPA experience. I think it lends to the overall strength in that we worked very tightly together as an interdisciplinary team much like our I.D. teams work in the field to accomplish NEPA work. One of the neat aspects of our process is we worked on a consensus-based decision-making model, and while we had a diverse team working out concepts and what type of guidance to provide, all of those different specialists were able to come together on consensus in terms of the guidance that we're actually providing. We worked together really tightly for about a year and I would have to thank the Utah state office who supported our efforts in providing us office space many, many times. So thanks to Utah.

>> R. Hardt: Cathy, you asked about our process. As Megan said, we worked for about a year to produce a draft here, and we sent it out for review to a cadre of NEPA experts. We responded to those comments. Then we sent it out for Bureau-wide review and by the solicitor's office more broadly and gathered all those comments, responded to those. And then after about 18 months, we sent this out for another review by the Department of the Interior, by the solicitor's office again, and then by -- finally by council on environmental quality itself.

>> C. Humphrey: That sounds exhausting.

>> R. Hardt: Yeah.

>> C. Humphrey: Now I know why it took so long to come out. Sounds like a good process, though.