

## Audience Questions

These are the questions and comments posed by the audience during the Purpose and Need broadcast and the section in which they were discussed by the panel. Some questions have been edited here for conciseness and understanding.

### Differentiating Purpose from Need

none

### Differentiating Agency from Applicant P&N

How do I address the need so it matches the purpose?

We're working on a project that has a list of issues. Is it inappropriate to use a bulleted list to make the purpose and need more clear and concise?

### Role of Purpose and Need

none

### Length and Specificity

We wrote a need for a grazing permit and IBLA didn't like it. The Need was to help provide an economic return on the ranch operations while providing for proper range management. What did we do wrong?

What makes a purpose and need legally defensible?

By defining your purpose in terms of regular law or regulatory responsibility only, a concern is the danger of being too broad and (or?) too narrow.

### Scope (Range of Alternatives)

Is it correct to use the applicant's P&N as background to allow you to narrow the need down a little?

Shouldn't a purpose statement be as concise as possible? The purpose of this EA is to analyze the impacts associated with BLM's proposal to build a bridge. The need would be to build a bridge (the proposed action) because there isn't one (a bridge). Does it have to be more complicated than that?

The CEQ regulations specifically say you can have reasonable alternatives outside of your jurisdiction if they meet purpose and need. One of the issues in confining the purpose and need to the agency's jurisdiction is the potential that someone could come back and say you're already artificially constraining your purpose and need so cannot consider alternatives outside your jurisdiction because all of these purpose that you have defined are all strictly BLM jurisdiction.

## Timing

We are facing issues in the southwest United States with renewable energy development, primarily in solar energy. How could Secretarial Order 3285, which seems to be promoting policy to authorize solar development on public lands, be considered or given deference in BLM's developing purpose and need statements in responding to the applicant's requests for developing solar production on the public lands in a defensible manner?

How do I make the purpose and need for my EA competent to be for an EIS? If we write our opening statements with EIS-like appeal, won't they be more effective?

Are there any phrases or wording or verbiage we should avoid in a purpose and need statement?

How do you develop a purpose and need for a project with multiple needs?

We had a third party EA in our office that was a programmatic EA, but it also included a site specific project. How do you write a purpose and need for that?

Richard said it's BLM's policy to tie the alternatives to those within our jurisdiction. Please provide a little more information on the CEQ regulations 1502.14c that say to include reasonable alternatives not within the jurisdiction of the lead agency.

What about addressing environmental consequences when part of the proposed action would/could happen on lands not managed by the BLM?

I have a concern with equating the No Action Alternative to an alternative that involves action on lands out the BLM's jurisdiction.