

## Planning Nuts and Bolts: Course Summary

Hi. You've gone through the different segments related to developing a resource management plan and the environmental analysis necessary to support that final decision and approving the plan. What we've tried to do is through these segments, set the stage in considering the kind of laws and issues you need to be thinking about as you go into the planning process. Then, once you're in the planning process, talking a lot about those concepts in developing the preferred plan developing all the alternatives necessary to accurately compare all of the issues related to that plan and then coming out with a proposed plan and finally approving the plan.

We also talked about in that third phase the issues related to implementation of the plan. So, as we're going through and summarizing the different sections, we're going to be talking, generally, about the tools, the techniques, all the considerations necessary as you're moving forward to develop the plan collecting the resources necessary from the data, from the interdisciplinary team issues, through the input of the collaborators. Also considering how are we consistent with a lot of the issues related to planning laws and other resource specific laws.

First we set the stage by looking at FLPMA, NEPA and some of the considerations related to the procedures necessary as you move forward in the planning process. You haven't yet started planning necessarily, but you're thinking, how did FLPMA work. What are the, literally, the words in FLPMA, the words in the regulations, the considerations in NEPA; what are those ideas and concepts that are really going to help develop the right plan for your plan area.

We then talked about making sure you don't forget some of these resource specific laws that are also a requirement of compliance. You need to integrate the Endangered Species Act considerations. The Historic Preservation Act considerations, Clean Water Act issues, Clean Air Act issues, tribal coordination issues. All of those considerations need to be integrated with your plan in order to make sure, well now it's not just going to comply with FLPMA and the regulations associated with it; it's not just complying with NEPA and the regulations associated with that, but we're also going to use this process to make sure we're complying with all of these other laws necessary for a federal approval of an action. And we're going to make sure, also, not to forget compliance with, and trying to coordinate with, state laws, local laws, tribal issues.

And then we also talked about how important that administrative record is. Again, if you think of it as the pyramid, the final decision, the approved plan and the record of the decision related to the environmental impact statement, well that's only a small component of the larger support necessary to make that plan. We want to show a good faith effort at full disclosure, we want to make sure we took a hard look at all of the issues considering a reasonable range of alternatives. All of that needs to be documented in the administrative record in order to create that road map to show the public, to show your collaborators, to show if there's judicial review that you have collected the right information to support your decisions.

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And then we took up the planning process. We began by discussing the preparation plan, its role and importance in the overall planning process. We talked about the key contents of the preparation plan, we talked about identifying roles and responsibilities of the ID team and also including the public participation plan in the participation plan. We talked about including a schedule and the general steps in the process of planning. We talked about including a budget. We talked about including data and the GIS needs which the data is going to create the foundation of the administrative record that Ken just spoke about. It's also going to identify, initially identify, the data that you're going to be needing later. We also identified planning criteria. And what planning criteria were and how they'd be used in planning process.

We then moved on to the analysis of the management situation or the AMS, which included a description and the role of the AMS in the overall planning process. We described the key contents of the AMS including the resources, the resource uses, the management, the management direction, and opportunities and ensuring that the individual resources and resources uses identified all of the regulatory components for their particular program.

In talking about one of the important elements as you're moving forward in the plan process, it's about scoping. It's about reaching out to other entities to make sure they're giving input in the process. Not just in terms of learning their particular issues, but also in terms of getting buy-in and support related to it. So we described the different requirements that NEPA and FLPMA have for scoping in developing that plan.

We also talked about the different opportunities that you have when you're going out to meet with different groups related to getting input related to it. Eventually, all that information at the early stages of the process, after you've done your notice of intent, is to create some kind of scoping report to show that you've summarized the issues, you've heard what folks had to say and then it basically creates a plan of how to move forward. Looking back at the prep plan, deciding do we need to make some adjustments as far as budgeting and staffing, information collection and then how are we going to move forward now in the next steps of the plan process.

We then talked about issues, issue identification, the importance of issues in the overall planning process. We also talked about the differences between attitudes, positions, interests, and issues. We talked about distilling down those attitudes and positions to actual issues. We also talked about how to frame issues in the R&P itself and the importance of the fact that the issues are the basis and the framework of the overall R&P analysis.

We then moved on to the plan goals, objectives, and alternatives. We talked about what a vision was and vision statements and how vision statements can bring together planning teams including cooperators and stake holders. We talked about the differences between goals and objectives and we noted that goals were really a purpose and need for the plan. And our objectives were smart; they were essentially measurable and quantifiable. We talked about alternatives within the planning context

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and what components went into an alternative including the goals, the objectives, the management actions, and allocations. We described the various roles of collaborators and envisioning in their participation in the development of the plan alternatives. We talked about writing goal and objective statements. We talked about the role of the alternatives in the planning process. And then we also talked about adaptive management. We talked about what adaptive management was, how it can be used in the planning process, and how it's actually important throughout the planning process because once you get to implementation and monitoring, which we'll talk about in just a second, it actually informs the resource and resource programs of how well the plan decisions are actually meeting desired conditions.

We then moved on to data gathering. We talked about the role of data in the planning process. We've already mentioned that it's the foundation of the admin record. We talked about identifying the types of data from statistically valid, analyzed data through quantitative, qualitative, and professional judgment. We talked about the sources of data, acquiring data from our cooperators and our collaborators and verifying the data's validity. We talked about screening data for the value of the data and is the data out-dated or is it usable in our plan.

And we talked about acquiring data if we didn't have it. If the price wasn't exorbitant, then we could include it. And if it was, and we weren't able to actually acquire it, then we would actually describe it in the EIS itself and the limitations of the information that we do have. We described IT and IT applications for collecting data, including data stewards and data administrators. Who is going to be in charge of the data initially, who's going to put together the metadata, who's going to then --- the data stewards would then just pass it off to the data administrators to maintain and hold. We talked about data standards that would be required for all the data including BLM and cooperator-supplied data.

And then the next step in the process is really taking all that information and doing some kind of assessment, making sure that you're spelling out the different impacts related to the human environment. NEPA requires that you do that alternatives-based impact analysis. So you're trying to look at the different alternatives that you organized through this process and look at your direct impacts, your indirect impacts, including possible growth issues, and then also, in terms of the cumulative impact analysis. Trying to make sure you're setting up an appropriate level of analysis for your programmatic EIR. And you're trying to anticipate, based on the information that you got, how the different alternatives would affect the environment. And all of those issues relate to the next step in the planning process as you're going forward to select the preferred alternative.

We discussed the preferred alternative, the selection, the identification of the preferred alternative that would go into the draft plan, draft EIS. We mentioned the fact that the BLM actually requires the identification of the preferred alternative in the draft plan. We mentioned that the development and the identification of the components of

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the preferred alternative were mixing and matching, so to speak, of the various actions and allocations of the other alternatives.

And next comes steps in the process where you're taking that plan, you're announcing to the public we do have a preferred plan based on the alternatives that we looked on, based on your input. We collect all that, basically, in the draft EIS and there's certain steps in the process, there's certain requirements on how you announce it with your notice of availability through the federal register with EPA actually publishing it. We talked about how you're going to collect that, the contents necessary within the actual draft EIS as well as how your announcing particular plan that is identified as the preferred. You're also, basically, setting up the next stage in the process as you're moving forward, you're saying, here's our draft, here's our first cut after hearing all of your input at what we think is the right alternative and also what we think is an appropriate level of analysis related to the impacts on the human environment.

Then in the next stage, we talked about evaluating comments. We talked about, okay, you've issued the draft EIS, you now have reached out to folks and said, what do you think? Did we get it right? So, we talked about how you could set up, basically, a process to receive the comments, organize the comments, categorize them, you're going to be using E-Planning as a part of that, and you're going to then think about substantive ways to respond to those comments. You're thinking about how, what is the most appropriate way to respond to that issue. Is it modifying the preferred alternative? Is it modifying the preferred alternative? Is it modifying some of the impact analysis? Considering all of the issues related to, does that require some kind of supplement and some kind of additional noticing necessary.

After you've evaluated your comments, you're moving forward to do your proposed plan announced in the final EIS. As part of the final EIS, you're considering what went into the draft EIS, you're considering the comments that were raised and now you're ready to release this final statement saying, here are the impacts based on the draft issues, based on the record we have. Here is our proposed plan. It may be modified from the preferred plan, it may actually be a continuation of exactly what was originally proposed as the preferred plan. And you're also, again, explaining to the reader, here's this step in the process. We're getting to a final point where some of these plan elements you need to be considering in order to decide if you want to protest that and there may be certain implementation decisions within the plan that you're still going to have to wait a little bit for a final approved plan and the record of decision.

So all of those elements need to come into these aspects related to writing the final EIS and the proposed plan and then issuing the record of decision as part of that analysis, as well as that approval of the plan.

So, after you've approved the plan, after you've signed the ROD on the EIS, you can feel like that part of the planning process is done. But as we've talked about, really doesn't start or stop at any one spot, scoping doesn't start or stop at any one spot. There's now the aspects of implementation, end of monitoring. So the first element

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related to that, looking at implementation of the land use plan. You're going to be looking at particular proposals that come out, requests the BLM to approve certain activities and you're going to be looking at the resource management plan and deciding is this consistent with the plan.

Have we, the decision in front of us, have we accurately portrayed that within the resource management plan, does it really encapsulate these kinds of uses. And then the other issue related to that is not only analyzing whether the plan is consistent, and as the next segment talked about possibly doing some kind of modification of the plan, but then it's separately saying, has the environmental analysis associated with the EIS has that accurately and adequately addressed the impacts of this particular action of the implementation decision that's happening that we're asked to approve right now.

And you go through that process by deciding was the original analysis adequate. Does this particular action fit under a categorical exclusion? Is there necessity for preparation for an environmental assessment and does that necessitate preparing an environmental impact statement more focused on that particular action or is it appropriate to do a finding of no significant impact? Trying to tier as much as possible from the programmatic analysis that was done in the EIS.

Thank you, Ken. That was very insightful.

Lastly, we talked about monitoring an evaluation of our planned decisions. We talked about the difference between implementation monitoring which was an evaluation of where the plan decisions actually implemented. We said there were no thresholds for effectiveness. We said that the second type of monitoring, which was effectiveness monitoring, actually had thresholds. We identified the types of components; the components of a effectiveness monitoring and if the effectiveness monitoring evaluation decided if, yes indeed the land use decisions were being achieved or they were not. And the third type was the plan evaluation report which is done annually on the overall land use plan and the overall decisions and if they are actually achieving desired condition. And then, they are actually, a report is generated every five years.

We also talked about the type of plan modifications. We said that amendments were, excuse me, we said that maintenance could be done at any time. We said that amendments were done when some decisions were no longer achieving desired conditions and could be completed with either an environmental assessment or environmental impact statement. And then a wholesale revision of the entire plan, which was a revision which is to be completed with an EIS during a much more complex process.