



Streamlining, BLM_WO <blm_wo_streamlining@blm.gov>

RE: BLM Requests Input for Future Planning Efforts and Environmental Reviews

1 message

Scot Timboe (b) (6)

Mon, Jul 10, 2017 at 2:45 PM

To: "Streamlining, BLM_WO" <blm_wo_streamlining@blm.gov>

Good morning,

From my perspective, NEPA was original created for the purpose of full public disclosure and preventing backroom deals that the public was unaware of. Today it has become a tool that environmental extremists use to delay, and challenge routine natural resource maintenance and preservation. NEPA should be rewritten to delete any elements of it or processes that require approval of any sort including as part of the project and instead streamline it to its original intent of public notification. Therefore, it would become a step by step process for the content necessary for public input and once it has been noticed for its availability it should then be removed from the process no different than a newspaper public hearing notification.

Thank you for your consideration,

Scot Timboe

Planner III

From: fhamedani@blm.gov [mailto:fhamedani@blm.gov] **On Behalf Of** Streamlining, BLM_WO

Sent: Monday, July 03, 2017 11:36 AM

To: BLM_WO Streamlining <blm_wo_streamlining@blm.gov>

Subject: BLM Requests Input for Future Planning Efforts and Environmental Reviews

I write to you today to ask for your ideas.

The President and Secretary of the Interior Zinke have asked the Bureau of Land Management (BLM) to take a new, in-depth look into our land use planning and National Environmental Policy Act (NEPA) processes. As someone who cares about the nation's public lands, your input is vital to determining how the BLM will approach land use planning going forward.

Our goal is to identify inefficiencies and redundancies that should be eliminated from our land use planning and NEPA processes, while ensuring that we fulfill our legal and resource stewardship responsibilities. By doing this, we will be able to dedicate more time and resources to completing the important on-the-ground work on our public lands.

Balanced stewardship of the public lands and resources is more important to the interests of the country and its people than ever before. This mission is also more complex and challenging than at any time in our history. But with your input, we can strike that balance.

We are opening a 21-day period, beginning on July 3, 2017 and ending on July 24, 2017, in which you can submit your ideas specific to how we can make the BLM's planning procedures and environmental reviews timelier and less costly, as

well as responsive to local needs. This streamlining effort will help shape how we move forward. You can submit your input by going to this link: goo.gl/CYxqM5.

The decisions made in land use plans and after NEPA analyses are fundamental to how BLM public lands and resources are used for the benefit of all Americans. We are committed to working cooperatively with state and local governments, communities, Indian tribes, and other stakeholders to determine the best ways to manage public lands for multiple uses and values, both now and in the future.

This effort is not required under any laws or regulations. We are doing this because we strongly believe that public input, especially at the local level, is an essential component of federal land management.

We look forward to hearing from you.

Sincerely,

Michael Nedd

Acting BLM Director

SPORTSMEN **FOR** **Responsible Energy Development**

July 24, 2017

Mike Nedd
Acting Director
Bureau of Land Management
1849 C Street NW, Rm. 5665
Washington DC 20240

RE: BLM Future Planning Efforts and Environmental Reviews

Dear Acting Director Nedd:

Trout Unlimited, the National Wildlife Federation, and the Theodore Roosevelt Conservation Partnership appreciate the opportunity to comment on the Bureau of Land Management's (BLM) review of future planning efforts and environmental reviews, and we applaud the goal of increased efficiency in land use planning while assuring the Bureau fulfills its legal and resource stewardship responsibilities. While we strongly support the idea of increasing planning efficiencies, we also believe it is critically important that streamlining not be seen as a means of diminishing environmental laws or as an end in and of itself.

It is paramount to find ways to create efficiencies that also increase agency transparency while maintaining and improving opportunities for public involvement in land use planning. Thus, our groups offer the following comments to aid BLM in making the planning process timelier, less costly, and more responsive to local needs.

Engage in Long-Range, Scalable, Collaborative Planning

To reduce redundancies in planning, save resources, ensure local participation in the planning process, and adequately address environmental concerns of an ecosystem scale, BLM should engage in long-range planning at the appropriate scale, identifying resource issues, conflicts and opportunities early in the process, and incorporating public input early and throughout plan scoping and development. This approach will allow BLM to consider and balance environmental issues such as crucial habitats (e.g., winter range, issues of migration and connectivity), while re-instilling a cycle of sustainable development that reconnects socio-economy and landscape quality in ways that are both self-sustaining and mutually reinforcing.

Scalable planning within the resource area (watersheds and other habitat areas) also aids in avoiding redundancies in the planning process. By engaging in planning with the appropriate scope and scale, BLM can account for concerns that cross field office and state boundaries, and can effectively cooperate with other cooperating agencies, both federal and state, to address those concerns. Early collaborative

planning with local stakeholders will help identify cross-jurisdictional concerns so they may be mitigated early in the process.

Update Resource Management Plans (RMPs) Continuously

RMPs require an intensive process, take a long time to complete, and are infrequently updated; many have not been revised in decades. We urge BLM to adopt a schedule to update RMPs on a rolling basis once every ten years and to develop administrative mechanisms for consistent monitoring and amendment of those RMPs every three to five years at a minimum. Regular analysis of management strategy and efficacy would make the RMP revision process less onerous, and would allow BLM to continuously incorporate the best available science into its planning process.

Regular analysis, as noted above, would also help BLM be more responsive to dynamic conditions and developing local concerns in a timely manner. Regular, effective monitoring between RMP revisions is essential to ensure compliance and address problems as they arise. Monitoring serves to protect all users on public lands by making decisions informed with current information and keeping the public informed. As such, monitoring standards should be clearly delineated for all desired conditions and BLM should produce regular public reports of results.

Early Planning and Data-Based Decision Making

We ask that the BLM establish a step at the beginning of the planning process where the agency collects known existing information about a planning area before initiating decisions about resource allocations. This process would increase coordination and use of information provided by the state agencies and counties. By collecting information up front, such as known fish and wildlife habitats, migration corridors, and energy resources, the agency will be better prepared to make informed, data-based decisions and allocate resources in ways that minimize conflicts among stakeholders. We believe that a “look before you leap” approach is simply common sense and a best practice in land use planning, one that should be used far more extensively. This action would likely result in better coordination, reduced conflict, fewer lawsuits and greater efficiency for project approval, permitting and plan implementation.

Vetting Alternatives with the Public

We strongly support the best practice of the BLM vetting alternatives with cooperating agencies and the public before issuing a draft RMP. By vetting alternatives with cooperating agencies, the public and stakeholders before issuing a draft RMP, the BLM is able to respond to feedback and refine a draft RMP to a point more closely reflecting the critically important input it receives. This can easily be accomplished while simultaneously maintaining special privileges of state and local cooperators. This approach has long been used as a best practice by some BLM managers to reduce conflict in land use planning, reducing potential for litigation and increasing efficiencies at the back end of the planning process. It should become a standard practice.

Update the Uniform Format for Oil and Gas Stipulations

The current Uniform Format for Oil and Gas Lease Stipulations was published in 1989, nearly three decades ago. We believe updating the current format across the Bureau would improve consistency and facilitate interagency communication, learning, and efficiency. The BLM should revise the Uniform Format to incorporate current best science and practices, particularly in light of significant industry

technological advances and new research on impacts to the environment from the increasing oil and gas footprint over the last 30 years. Any waivers, exceptions, or modifications to stipulations should require public review. Grounding the Uniform Format in sound science and providing for public review will increase efficiency by obtaining upfront input from the scientific community and the public, reducing the potential for expensive and time-consuming litigation, and ensuring public buy-in to responsible energy development.

Update Websites to Adequately Inform the Public

We urge the BLM to ensure state offices adequately facilitate public participation by making public information easily available online and updating email rosters of stakeholders. Currently, in many state offices, public information is difficult to obtain even with the recent eplanning addition to the BLM website. Those offices should update websites and email lists to ensure public input is obtained early in any review process, and that all stakeholders are encouraged to participate in planning.

Improve Planning and Public Participation in Oil and Gas Leasing

We believe the lease nomination process is outdated and warrants review and refinement to design a more comprehensive approach to lease nomination that better comports with resource management plan objectives and implementation.

RMPs should provide a solid framework that guides leasing to areas with important deposits and ensures an appropriate balance between development of oil and gas and sustaining other multiple uses of public lands, including fish and wildlife. There need to be limits on how easily that balance can be overturned when or if circumstances change regarding either development potential or the needs of fish and wildlife. BLM should ensure that leasing locations, levels and terms continue to meet multiple use goals by carefully monitoring achievement of planning objectives. Unanticipated impacts may require BLM to re-visit terms of availability for oil and gas leasing.

We encourage the BLM to analyze development scenarios and updated mitigation measures for oil and gas leasing at a scalable level prior to issuance of leases, and to incorporate public input in a uniform process across all states. Many RMPs are outdated and require revisions. Amendments or revisions to RMPs should be viewed as an opportunity to engage in collaborative regional and landscape level planning, taking a more proactive and comprehensive approach to mineral leasing. Conditions that may warrant additional landscape level planning include but are not limited to: risks to fish and wildlife habitat, migration corridors, lands with wilderness characteristics, adjacent or nearby lands, watershed conditions, cultural resources, and public health and safety.

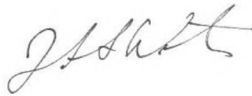
Further, all BLM field offices should provide a 30-day public review and comment period for Determinations of NEPA Adequacy (DNAs), Environmental Assessments (EAs) and unsigned Findings of No Significant Impacts (FONSIs) for oil and gas leases. Currently, each state decides whether to offer a pre-evaluation of lease parcels offered and then a 30-day public review of the environmental assessment. This will ensure BLM acquires public input upfront, which will obviate the need for additional environmental review and reduce or eliminate objections and litigation.

Thank you for your consideration of our input on the BLM planning process. We stand ready and willing to work with you and the BLM as the agency looks to revise its planning process in the future.

Sincerely,



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Cc: Heather Bernier, BLM Acting Division Chief of Decision Support, Planning & NEPA