

Focused Analysis: How can the BLM reduce duplicative and disproportionate analyses?

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dbrown@americaoutdoors.org Yes, I would like to participate in future streamlining efforts.

Online portal would not work for me.

Focused Analysis:

- A. How can the BLM reduce duplicative and disproportionate analyses?
 - a. Develop Resource Management Plans with programmatic environmental assessments for recreation that enable managers the flexibility to permit new commercial uses without having to create extension documentation or plan amendments. BLM is already doing this in some areas. This is key to authorizing NEW activities without extensive NEPA documentation.
 - b. Renew permits that have been ongoing and do not present significant impacts without new NEPA analysis.
 - c. Consider the Limits of Acceptable Change model in RMP's to provide a gauge as to when additional NEPA would be required for new or renewed permitted activities after they have been broadly authorized by the RMP.
- B. User-friendly Planning: How can the BLM help state and local governments, tribal partners, and other stakeholders understand and participate in the planning process?
 - a. Develop concise Executive Summary that enable readers to review and submit substantive comments.
 - b. Develop on line templates that help them provide the information in comments that are necessary to submit substantive comments.
 - c. The National Landscape Conservation System manuals were written without public review and comment. Rewrite those manuals to provide more status to recreational uses. Also, consider working with Congress to make recreation a value for establishment of the NLCS.
 - d. BLM has eliminated some activities that have been successfully practiced under permit for years, such as technical canyoneering, possibly because of the establishment of the Monument and the lack of support for high adventure recreation.
- C. Transparency: How can the BLM foster greater transparency in the NEPA process?
 - a. Provide on online list and status report of the changes to RMPs that are occurring in each state with link to comment forms and executive summaries.
 - b. Use association to help promulgate information about NEPA processes.
- D. Being Good Neighbors: How can the BLM build trust and better integrate the needs of state and local governments, tribal partners, and other stakeholders?
 - a. Continue outreach.
- E. Reducing Litigation: How can the BLM create legally defensible documents and avoid the delays associated with legal challenges?
 - a. Consider working with Congress on statutory CE's.
 - b. Work with CEQ to develop guidance for NEPA streamlining.
- F. "Right-sized" Environmental Analysis: How can the BLM more closely match the level of NEPA analysis to the scale of the action being analyzed?
 - a. NEPA needs to be streamlined so that extensive documentation is not required for every site specific authorization.

- b. Further, RMPs should provide the appropriate level of documentation without requiring extensive amendments and NEPA for new recreation activities if they are substantially similar to existing uses which have been authorized where or not they are commercial or private.

Recommended solutions may include changes to BLM policy (e.g., Bureau manuals, handbooks, etc.); changes to regulations; and/or changes to laws.

You are welcome to submit multiple forms if you have more than four recommended solutions for a topic.

The BLM will consider the input you provide as the Bureau identifies potential solutions for improving the planning and NEPA processes. However, please note that this is not an official comment period; the BLM will not be providing responses back to you on the input you submit.

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The BLM is interested in soliciting public input about ways to streamline the Bureau's planning and NEPA processes. This request constitutes a general solicitation of comments and does not seek information about commenters, other than that necessary for self-identification. Therefore it is not subject to the Paperwork Reduction Act, 44 U.S.C. 3501-3521. (Please refer to implementing regulations at 5 CFR 1320.3(h)(4)).

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