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? Solution #3	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? Solution #4	E. Reducing Litigation: How can the BLM create legally defensible documents and avoid the delays associated with legal challenges? Solution #1	E. Reducing Litigation: How can the BLM create legally defensible documents and avoid the delays associated with legal challenges? Solution #2	E. Reducing Litigation: How can the BLM create legally defensible documents and avoid the delays associated with legal challenges? Solution #3	E. Reducing Litigation: How can the BLM create legally defensible documents and avoid the delays associated with legal challenges? Solution #4	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? Solution #1	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? Solution #2
		It seems to me that given the reality that federal lands serve multiple interests, some that compete, litigation is a given. The only solution that might help would be efforts to try to bring together environmental and conservation groups with mining and extraction interests to forge relationships of trust. Might seem naive, but worth the effort.					
Avoid "one size fits all" approaches to land management.	Amend Appendix A (I) (B) of the Land Use Planning Handbook to recognize that local citizens know the land better than "distant interests." Distant interests don't have to live with the land management positions they often take.	Much of the legal challenges and delays can be avoided through legislation to amend or repeal the Equal Access to Justice Act. This act provides a financial incentive for NGOs to sue the federal government and settle once they get their way. The net result is a well-funded network of attorneys in environmental organizations who make a living suing federal agencies.	Amend the Endangered Species Act as recently proposed by House republicans.	Roll back federal over-reach at the EPA.		Make greater use of Categorical Exclusions.	Vest greater decision-making authority at the field office level.
		More government-to-government consultation with tribes, earlier in the process.				Maybe there can be more levels besides just a FONSI or a 1000-page EIS.	
Clear open communications straight forward language. This is a joke. You are only doing this so you can say that you asked for public input. The above statement is completely asinine. "Discrete idea"- code for top secret. Absurd. I'll bet whomever wrote that believes themselves to be clever.						Answer the question, "is an enviromental analysis need"!! ANY negative and direct environmental impact, no matter how small it is perceived by someone uneducated in the natural sciences, can have significant indirect impacts upon other parts of the environment as a whole. Stop looking for ways to wipe out species so Trump's buddies can get richer.	

Seek support of applicable state legislatures, county commissions, and LOCAL tribal leaders (if applicable) of all proposals, rules, policies, etc. Note that the US Constitution clearly limits federal land ownership to that obtained "by the Consent of the Legislature of the State".		All law-enforcement authority must be taken from the BLM. Instead, the BLM should rely on the sheriffs for all law enforcement functions.	The BLM must aggressively pursue the "multiple-use" concept and cooperate with all users (state legislators, county commissions, LOCAL tribal leaders (if applicable), sportsmen, campers, backpackers, miners, rangers, loggers, etc).	The Antiquities Act must be rescinded or amended. If the amendment route is taken, all changes of land status from "multiple use" to monument, park, wilderness status, etc. must be initiated at the local or state level -- not from environmental activists or lame-duck presidents in the final days of their administrations. Note that the US Constitution clearly limits federal land ownership to that obtained "by the Consent of the Legislature of the State". All changes in status must be severely limited to protect significant natural, cultural, or scientific features -- not vast tracts of land, most does NOT comprise significant natural, cultural, or scientific features	Seek support of applicable state legislatures of all proposals, rules, policies, etc. Note that the US Constitution clearly limits federal land ownership to that obtained "by the Consent of the Legislature of the State".	Seek support of applicable state legislatures, county commissions, and LOCAL tribal leaders of all proposals, rules, policies, etc. Note that the US Constitution clearly limits federal land ownership to that obtained "by the Consent of the Legislature of the State".	
		Work directly with special interest organizations and non-profits in scoping major actions and implementing Land Use Plans and Amendments. Set aside time and ask known stakeholders for comments up front.				Maintain publicly accessible comprehensive GIS database with project descriptions and tracking so public can inspect pending actions and comment on issues. Public concern should play a greater role in analysis. A national map database like the US Energy Information Agency maintains for energy infrastructure should be maintained for all BLM NEPA reviews with layers that can be toggled by program. More transparency will provide more appropriate level of analysis.	
		BLM can do this by making decisions based on ecological needs; not political.				You've got too many people trying to think up unnecessary questions.		
Sometimes extra measures may need to be put into place to protect this economic impact to keep the recreation available, even though from the land managers standpoint, it may not be feasible or make sense. At this point, the local government that would be the most negatively impacted, should have a bigger say in how the land is managed, and may have to provide some resources to ensure it is managed properly.		Change nothing Ensure all the proper stakeholders are engaged, and that they all have agreed to the proposed plan. If the person in the room does not have the authority to sign for the organization, they need to get someone that can. Once everyone has signed that they agree to the completed document, and that they can live with it the way it is, then that will mitigate litigation in the future.	The power players for the major groups need to be involved, and the smaller groups that can not be represented in the collaborative need to have an understanding with those that are in the room, that the best interest of their respective members and users are being represented to the best of their ability.			Change nothing Understand what the scope of the area being analyzed is, and don't let scope creep affect the planning process. It is hard, because everyone wants their little bit included.	If the whole area was analyzed from the beginning to understand the potential issues with the area under that land managers area, then the smaller environmental analysis would not be required. Kern County did something similar to this with the oil and gas industry to help speed up the process of approving new wells and the infrastructure associated with the industry. It seems to be working, and was a long time in the planning and implementation phase.
		Science-based decisions.	Rigorous use of best management practices.	Make few, if any, "exceptions" in management for individual stakeholders.		Not sure about this one.		
We would like to send you a document. Please provide an email address. Thank you.	We would like to send you a document. Please provide an email address. Thank you.	We would like to send you a document. Please provide an email address. Thank you. Work to get the law changed whereby groups are reimbursed their legal fees whether they win or lose. I will try to do the same. It's outrageous that groups with an agenda can file a lawsuit and be reimbursed their legal fees by the US government whether they win or lose. They then take that money to file another lawsuit, filling their coffers to continue this practice, further their agenda. I don't know where to start. Help me help you in eliminating this practice.	We would like to send you a document. Please provide an email address. Thank you.	We would like to send you a document. Please provide an email address. Thank you.	We would like to send you a document. Please provide an email address. Thank you.	We would like to send you a document. Please provide an email address. Thank you. How about revising the NEPA?	We would like to send you a document. Please provide an email address. Thank you.
		include and collaborate these groups as well as the public to put pressure on the litigants	establish that the litigants will pay all legal fees if they loose	establish time limits on suits and how long they can linger		engage local/regional BLM personel and public in early decision making and not engage NEPA unless absolutely necessary. for instance..establishing a water source/well on BLM should have the opportunity for a Catagorical Exclusionand not a full NEPA analysis	
Double the amount pf public meetings for all NEPA.	Hire people who can explain the process patiently.	By not pushing for development on projects so much. Listen to the public and stop pandering to developers.	Litigation comes from political influence that shortens BLM review. BLM should stick to their mission and stop being influenced by corrupt political entities.	Do not streamline NEPA!!! That is asking for litigation and you will get it!	Make sure everybody is heard by lengthening public review and adding more meetings. But you will never get rid of potential litigation. Move on.	BLM almost never has a long enough review process. All EIS documents should have a standard 120 day review process. By making things too short, BLM always ends up with incomplete analysis.	Add more public meetings and have more notifications in local papers.

It takes so long and expensive to get any project done on the land, that all parties agree on except those that don't want cattle, cars or people on the land. The best managed lands are managed local. The best managed lands are the ones the ranchers and BLM have worked on the bring water and feed to the land which brings wildlife and great pastures for cattle and other livestock.
We seem to have a cut and reduce mentality instead of a growth and increase grazing possibilities mentality.
I believe we do need to look at the impact the decisions will make on the land but we need to realize of the best managed lands for grazing are the best Managed lands for everything else

Do wants best for the land. Don't Cave to frivolous lawsuits. And those that do Sue need to pay their own cost not with taxpayer money.

The BLM needs more scientists to understand exactly what the conditions on the ground are. Lawsuits stem from stakeholders' assumption the land is theirs to use no matter it's condition. With a clear baseline of condition, and a long term landscape view, the BLM will have defensible positions.

The right size of analysis depends on how much knowledge the BLM has of the area. Less knowledge requires more analysis.

Create an atmosphere that is more open. Many BLM employees only socialize with each other. They are not at community events. They hide from the public. They are not proud of their jobs. That creates a broken system. Encourage them to be out it is required, not because they want. Train BLM there in the public as part of the community. Encourage them to open up.

Stop the game playing. BLM has meetings with stakeholders so they can check a box. They come to the meeting with a closed mind and and an intent to limit what they will say. They participate because employees that the right thing to do is work with the stakeholders who are affected by their management decisions.

Train BLM employees to collect repeatable measurable data, analyze results and write reports about trends. Assure that if someone else goes out to collect the same data they will get the same results.

Purge agenda driven BLM employees that are dishonest.

Stop playing games when public involvement is required. Instead, truly engage the stakeholders and listen, learn and act on what they have to say.

Change the culture at BLM. The employees are paid high salaries with very little accountability to anyone. Make them produce. Require weekly time reporting that includes results tied to goals. Shake up the organization. Make it come alive. People will feel better if they are productive. That will take a shift in the culture. Reward the achievers. Stop the apathy.

Create a common sense cost benefit analysis wherein the time and money spent on the NEPA process is looked at relative to the risk to the environment from a particular activity. Create more categorical exclusion lists.

Streamline EAs and EISs with good templates.

If sued, BLM should look to proceed in an expedited manner (always dependent on the federal court's calendar). Long delays and requests for continuances should not be coming from BLM. BLM should refuse requests for continuances from opposing parties. Discovery, if necessary, should be prompt and within the designated timeframes of the civil rules.

Elimination of all legalese from main and/or most important planning documents. All NEPA related documents should be condensed for all to read and understand. Supplemental legal treatise can be included, but it should not be necessary to submit comments.

Allow all comments to be provided electronically. Succinct ideas can be absorbed. The current e-platform I'm using to type these comments is a good example.

Provide for the necessary resources to do a thorough job. Increase cost recovery or 3rd party contracting opportunities to gain additional BLM work capacities.

Make decisions that you will defend in court. Show the public that appeals don't result in negotiating down a decision. That encourages more. Be willing to defend all land management decisions to show the special interest groups that once BLM considers all issues, resolves them appropriately, and makes a decision, it means business on implementation.

Reduce willingness to pay EJA fees to litigants.

Tough one. Judges who don't know NEPA too well, like to land on side of conservatism and push EISs. BLM should consider ways to make a small and efficient EIS easy to prepare. That way, BLM can avoid losing the debate of whether an action has the potential for significant impacts.

Consider preparing more "programmatic" NEPA documents that allow/facilitate many small future projects to be approved using Determination of NEPA Adequacy or Categorical Exclusions.

I have no idea. Too many lawyers.

Develop protocols for different levels.

BLM should consult earlier in the NEPA/review process rather than wait until litigation later on in the process.

Unfortunately, the impacts of a region studied under NEPA will have a farther reach than the land itself (see economic concept of externalities), and therefore BLM will have to evaluate the effects of changes to one parcel of lands to other parcels (e.g. wildlife connectivity, cultural landscapes).

Revise NEPA and include the following Statute of Limitations: for categorical exclusions, 3 months, for environmental assessments, 1 year, and for environmental impact statements, 2 years. Otherwise litigation follows the Administrative Procedures Act with a Statute of Limitations of 6 years for all actions.

Require that all administrative appeals be exhausted before any litigation before a federal district court. Congress carved out this process in the appropriations bills for the grazing program only- it needs to be applied to all actions and all programs.

Add more categorical exclusions. There should be one that could be applied to any program for a project in an existing disturbed setting where there are little or no resource values.

Add a new regulation requiring environmental assessments consider potentially significant impacts only. This negligible impacts should not be considered.

B LM managers should incorporate all input from interdisciplinary team staff specialists instead of picking and choosing what input they want.

Right size anslysis is already in place with NEPA with the use of categorical exclusion, determination of NEPA adequacy, environmental assessment, finding of no significant impact, and environmental impact statement. Managers should make sure all input is incorporated by interdisciplinary team members.

Exercise due diligence in engaging public officials.

Exercise due diligence in communicating the potential environmental impacts.

Operate in good faith with landowners. Play a supportive role in protecting neighboring landowners.

Legal challenges are not necessarily a bad thing. In many cases, such challenges are protecting natural resources and members of the public who rely on them.

Uphold the rights of citizens who rely on the land, water, and natural resources that are impacted by drilling and infrastructure projects.

Delays are needed to ensure compliance with regulation at each step of the process. Streamlining the process does not protect members of public.

Any time waterways and drinking water resources may be impacted, due diligence must be exercised in assessing potential risks.

Hazards are abundant with drilling and infrastructure projects. Each project must be carefully analyzed whether it impacts a community of 100 people or 100,000 people.

Implement Planning 2.0
Follow the NEPA process meticulously.

Give legally defensible reasons for BLM decisions at every stage during the NEPA process, inviting informal challenges at that time.

Never exclude any contributions during the public phase of the NEPA process.

Eliminate shortcuts to the NEPA process.

Implement Planning 2.0
Scale is a subjective description that is particularly subject to abuse. Never assume ahead of time that the NEPA process should be adjusted to match a preconceived scale. Let the needed scale emerge from the process.

Go to the public - instead of making us come to you.

Do not ignore the public.

Stop trying to take illegal action and then maybe you can avoid delays associated with legal challenges.

Why are all of your questions written with bias embedded in them?

Are you kidding me? Don't you have lawyers that can figure this out for you?

Use less lawyers

Follow the law in the first place, and stop using shortcuts to bow to industry pressure.

BLM can avoid litigation by protecting the environment and ecosystems that rely on it. Legal challenges only happen when the BLM is influenced by industry with profit motive.
Uphold the laws that exist. Strengthen the laws that protect public lands.

Follow the law. There is nothing wrong with legal challenges. We live in a democracy.

Provide time for adequate comment.
BLM cannot circumvent NEPA and other environmental laws. If a policy needs to be challenged, BLM should not circumvent the legal challenge by devious means. If BLM fully considers the best scientific evidence to support an action, its policy should be sound and will not be as easily challenged. But the agency needs to depend on science and full consideration of environmental impacts.

The best way to avoid legal challenge is to follow the letter of the NEPA law.

Take environmental groups seriously.

Don't let industry get away with actions that are bad for the land.

What makes you think the levels are not matched?

You need MORE environmental analysis - what you do now is down sized.

Work more closely with the public to see if they are happy with how much you are analyzing.

What?

Keep NEPA the way it is, it works fine. There are already varied analysis dependent on the situation and action to be taken.

Environmental interactions are complex whether the field of action is large or small. Thorough investigation is the right way to go.

Keep NEPA as it is. There's a reason it's rigorous.

Find folks in the agencies that can mentor new people coming in. BLM is notorious for those in high positions to hoard the position to the detriment of the Agency. Or the folks already established, were never mentored so they don't know how or have the time.

Have more outings that include these stakeholders, picnics, safety days, BBQ, offer classes at the offices or somewhere, brown bag information lunches, open house at the office, reach out to schools, colleges, universities, sharing NEPA information to people. Help everyone have a opportunity to understand NEPA in fun, interesting ways.

Decide early who is the person over the Project. Are the experienced? Competent in the NEPA Process? A good leader?

When you skirt the rules you will have litigation. Do your job and protect the land, water, air and environment.

Litigation can be reduced by following the law and maintaining / expanding the environmental review process. Providing access and transparency to the subsequent reports and recommendations can also reduce legal challenges.

Provide past success examples. Show success stories. Educate

Again NEPA Teams seem like the best answer.

Involve the Agency Lawyers early

Train your employees (can't teach an old dog new tricks), or hire employees who understand creating legally defensible documents. Agencies have created their own cesspool of employees who don't care. Other employees carry the load, work well in teams, are conscientious, dedicated, and hardworking. Agency leaders need to hold their employees together and lead like a leader. Most don't, due to any amount of reasons.

There is no "Right-size," Every analysis is unique, every environment is unique, there is no one-size-fits-all. Go to the Law. Stay within the Law. Don't cater to Industry or the current or future administrations.

Thoroughly analyze all impacts to public lands, and take the time necessary to do it right.

If it doesnt pertain to the situation, throw that part out.

Who determines the "scale"? This can be in the eye of the beholder. Follow the law and be transparent about it.

Hold workshops, online webcasts and other online meetings .

Host debates, discussion groups and open houses at convenient times and places to give the public a chance to hear pro's and con's about a project.

Being lawyers from all sides into the discussion early.

Work out differences before the documents are finalized.

Include all impacted stakeholders in the process.

First, analyze whether the scale of the action is directly related to the level of analysis needed.

Matching the level of analysis to the scale of action may not be the approach to take. A small action could lead to large consequences.

I have given this answer in the first part. 1. BLM often uses report authors who lack expertise. 2. BLM often uses many piecemeal reports to say each impact is not significant without looking at cumulative impacts. 3. BLM often uses reports that do not look at overall, long-term effects.

I believe BLM is usually challenged because the scope of their reviews is too narrow. By embracing the overall situation, BLM can probably limit legal action against the agency.

Good lawyers can draft documents that should be legally defensible.

Scientific data analyzed by top peers.

Planning outcomes should emphasize integrated resource management.

Establish stepped-down planning processes

NEPA has already withstood numerous legal challenges and should be left intact as it has proven that in the courts

Don't shorten the NEPA process, or cut the people or the science out in favor of shorter times and big industry. That will not improve the process, just create more problems in the future.

I don't think this is currently a problem.

stop destroying the environment!

stop destroying the environment!

stop destroying the environment!

stop destroying the environment!

stop destroying the environment!

stop destroying the environment!

It's already in NEPA called a ROD.

Hire the best environmental scientists to draft the preservation plans.

Have many more EIS. That's how NEPA was intended to work. EAs are really only suitable for the smallest of projects.

When issues arise, listen, communicate, and figure out solutions among the effected citizens.

Listen to citizen concerns.

Use public meetings to gather citizen ideas about how to solve the problem. Keep the citizens, be they tribal or other, actively involved in what you are doing, and the case in any court will be stronger.

Through the citizen base you have developed, ask for in-put on how the expedite legal challenges.

Consider all aspects of the consequences. For example, reintroducing the wolf to Yellowstone National Park met a great deal of concern from ranchers and farmers around Yellowstone. The wolves help balance the food chain in the park, but we understand the BLM does help ranchers who have lost animals.

Priorities must be made known to the citizens. For example, in Colorado, farming and ranching have the first call on water use. Developers are always trying to get change the law so that industry and urban gets first call. When the citizens of Colorado have known the consequences of changing priorities, they vote to keep water on agriculture.

Skipping proper analysis leads to conflicts, redundancies, and inefficiencies. When in-depth analysis and public input is conducted early on, there are fewer delays and legal challenges down the road. Sidestepping or rushing analysis inflates the process and increases costs to taxpayers and industry.

Don't cut out public input and attention to environmental impacts.
Give the public a chance to weigh in on decisions and evaluate the environmental impact of actions. It is not only the law, it's also the best thing for our public lands.

Industries should not form environmental policy. Of course industry opposes any regulations that might cut into profits or delay financial gain! If they were truly concerned about the health of our public lands, they wouldn't be opposed to a process that carefully evaluates environmental impact. As a steward of our public lands, BLM has an obligation to do what is best to protect our natural and cultural resources.
Insist the BLM fulfill its obligation and maintain strong environmental review practices. Our long-term public and environmental health is not worth any private company's short-term profits.

NEPA is law and BLM cannot undermine it NEPA has withstood many legal challenges over the years. It is the best tool we have to protect public lands from ill-conceived actions. Parts of the act frustrate industry factions because it provides multiple opportunities for public input.
However, it is intentionally a rigorous process designed to uphold public trust and scientific integrity. Any action BLM takes must follow laws and:
Use the best available science
Fully explore reasonable alternatives
Solicit and consider public input in an accessible, transparent process

there is not a streamlined process. environmental concerns outweigh the need for speed to make quick profits

give the public and environmental law experts the time to evaluate.

Follow the law. Do not shortcut. Use the best available science., and fully explore reasonable alternatives.

I don't know, but I do know BLM should be following the law. Maybe BLM should hire additional staff to ensure the process is complete and timely.

Transparency

Pro bono lawyers

Don't be afraid to trim the fat

Don't allow projects unless there is sufficient funding to fully execute the NEPA process. It is law.

Examine regional impacts (eg, air quality, water resources, large mammal migration...) not just the impact of an individual well, for example.

Advertise scoping well so that important issues are not inadvertently left out of analyses.

Consider regional impacts in a large analysis, then supplement with smaller individual analyses that reference the large analysis.

Don't forget that law dictates much of the NEPA process. Though sometimes cumbersome, even with the process, some environmental impacts are overlooked; our world cannot tolerate much skimping on the process.

work with all stake holders

Need to look at the area as sections and take out the trouble areas

Honest open transparent communication will certainly help when dealing with any entity.

Common Sense.

Multiple use in mind.

The full NEPA has been shown to discover possible conflicts that might produce delays or litigation. A shortcut procedure will result in more, not fewer legal challenges. NEPA is the law of the land and BLM should follow it.

The goal of Environmental Analysis is to "get it right". BLM is tasked with maintaining the long term vitality of the public lands, with long term health being the key goal. A shortened analysis may suit the short term goals of those wishing to make a profit from public lands, but it does not serve the long term environmental vitality of the land.

Create an awareness and education campaign

Work with stakeholders to come up with win-win solutions

involve stakeholders throughout the process

Create a citizen's academy to educate involved stakeholders

Work with local planning departments

Work with local leaders to assess community interest and likely opposition

The BLM can create legally defensible documents and avoid delays associated with legal challenges by working with legal people who are skilled, have the best interests of the People and the Planet as the priority and are not in the pockets of the corporate entities hell-bent on greed, power and extraction of our valuable resources and cultural heritages for corporate profit.

Build a skilled and dependable team that is trained to "measure" each action that responds to the health of the Planet and will of the People instead of responding to the pressure of corporate greed and government manipulation.

Talk with potential litigants early and all through the process

Be very thorough in developing your plan; address all issues in the first draft and solicit input with potential litigants early in the process

Listen to input

Invite and visit with stakeholder in person and digitally

Advertise heavily in the area being analyzed as to how folks can have input

Honor stakeholders equally - not bending to those with the most money and/or political power.

Base all decisions on solid science!

Base all decisions in equal partnership with all stakeholders.

Maintain the public trust now and for future generations - think long term!

Dedicate the necessary time and study up front to avoid costly litigation and "fixes" down the road.

Carefully consider how you define "scale of the action being analyzed." Is it economic, number of acres, proximity to public scrutiny? All actions will have impacts - sometimes "small scale" acting will have large scale impacts. Commit to careful analysis and public input on every action.

Make those that appeal or sue pay for the government time spent on the appeal or suit. Frivolous law suits are too easy now with no penalty for the plaintif. Now there are cut and paste appeals that sometimes do not even have the correct project. The government is maintaining an industry to fight themself. Appeals and suits should have merit not just be able to move forward on a shotgun basis. Shotgun. Sing say the NEPA document violates everything hoping one will work to stop the project.

By using sound interpretation of science in NEPA documents- that is probably best developed by people with suitable scientific backgrounds at NOCC or state office levels, and used consistently across the BLM at the field office level. Example, the NOCC rangeland ecologist could summarize the relevant livestock stocking rate literature for the U.S., and come up with a defensible and specific set of recommendations based on it, that could then be used by each Field Office during livestock permit renewal NEPA

Use the natural hierarchy of the BLM to address NEPA at the right scale...use programmatic level NEPA written at District, State or National levels wherever possible to cover the needs of multiple field offices or recurring issues so at the field level, just the details of a specific action need to be addressed, and a lot of the action would be covered by a DNA

Listen with an open heart.

Avoid delays by not rushing analysis.

Accept that the NEPA process is the law. As a steward of our planet BLM is obligated to protect our natural and cultural resources.

Do not be swayed by industry and money.

Awareness of the law is the first step in reducing litigation.

If the BLM (for some reason or another) takes a tack (legal or not) that conflicts with the interests of stake holders, there's going to be litigation. One way to avoid it is to focus on using the land for low-impact recreation vs. "resources" development (oil and gas). Education about managed forests, sensitivity to the interest of Indian tribes over artifacts and history. IMO the "greener" the BLM becomes and the more pro-active in that direction, the less litigation it will deal with down the road. Now, however, it's probably a different story.

I don't know

It is sad that litigation is necessary. It is because conservationists, fishermen, wildlife advocates, hikers, backpackers, campers feel it is the only option as their voices are not weighed appropriately. BLM has a job to balance use and extraction and mining seem to win. They never clean up and the tax payer is stuck with the bill. They just file for bankruptcy. The ATV fad is tearing up the west and damage fragile areas, housing developments, dams that are not necessary, sprawl and its consequence need to be given even more importance than in the past, not less.

Careful and scientific analysis should be performed. Data cannot just be invented. Studies need to be made. We don't need to streamline the process. That would only help industry and not give the general public time to get their position together. We need more, not less science. we need more time not less before we do irreversible damage.

You will always have legal challenges if you take away public lands from the public

these lands belong to all of us. If a local party wants to use the land for business purposes they need to pay for use

That goes for hunters & outdoor enthusiasts who should sign waivers to protect BLM

There only is a limited amount of wildland. Once gone it's gone forever

There only is a limited amount of wildland. Once gone it's gone forever.

Sell all the BLM land and pay off the debt

Sell all the BLM land and pay off the debt

Sell all the BLM land and pay off the debt
Your premise here is flawed. You cannot reduce litigation. As long as the BLM is making a decision, someone will not like it and will protest, appeal, and litigate it. The only way to avoid the delays of a lawsuit is to shutter the entire federal government.

Sell all the BLM land and pay off the debt
Your premise here is flawed. You cannot make documents bulletproof. The most you can do is learn the right lessons from the lawsuits. If you lose because you did not analyze 'X' in this document (whatever X is), the lesson is NOT "We must always analyze 'X' in every document from now on." The lesson is, "Why did we have to analyze 'X' in this document, and when is it appropriate to analyze it in future documents?"

Sell all the BLM land and pay off the debt
Incorporate the possibility of litigation into the project planning.

Sell all the BLM land and pay off the debt
Give the state offices the ability to decide what to do with settlement offers and possibilities. Do not make them waste time and resources going through the zero-value added process of waiting for the WO to make decisions that they do not have the experience on the ground with a given project to make wisely.

Sell all the BLM land and pay off the debt
Stop trying to make NEPA documents bullet proof. EAs and EISs have gotten so large because BLM keeps holding to the mindset of "If we just add more pointless analysis about more non-relevant stuff we'll win next time, you betcha." Focus on what's important to the decision, not on how much can be crammed into a single document.

Sell all the BLM land and pay off the debt

By listening from the beginning and following what I heard public wants not corporations.

Keep it local.

Keep public and adjacent lands free of harmful materials and activites.

See previous suggestions, if your partners and stakeholders are on board for the whole process, it is much more likely that you will experience fewer legal entanglements.

I don't think this is possible.

I think all environmental analysis needs to be thorough. It is necessary to preserve and restore a healthy environment in America.

Environmental integrity should be top priority. That is the default nature of this planet. Any change should be considered with care.

Planning 2.0

Planning 2.0

Planning 2.0
Fulfill all requirements of the NEPA.

Planning 2.0

Planning 2.0

Planning 2.0

Planning 2.0
Fulfill the legal obligation to carefully evaluate environmental impact via the NEPA.

Planning 2.0

Shut down Corporate frivolous rights to sue.

Shut down Corporate frivolous rights to sue.

A solution other than moving to Denver - do not let BLMers stay in Washington DC more than 10 years - make sure everyone is moving around in the system and staying in touch with issues and constituents.

Never, ever force state and local governments to come to the BLM - always travel to them instead. Have RAC meetings at those places.

So, how do corporations and other agencies do it? BLM has always been reluctant to adapt from other agencies and entities. They simply need to look around at agencies and entities who have a fantastic record of legally defensible documents and adapt those methods and formats. Ask such agencies and entities for advice.

Be honest and trustworthy.

Live up to your obligations to the public.

Report internal politicization of BLM employees who abuse their authority or overstep the boundaries of Policy or ethics.

Pass Torte reform to exclude intervention litigation that fails to have direct ownership or business involvement in BLM property or actions.

Develop a legal screening committee to determine authenticity of legal intervention groups.

Stop government grants to groups using the money to sue the government.

The problem isn't creating legally defensible documents, it is taking legal actions in the first place.

Engage your legal opponents in the creating solutions before it goes to court.

The BLM lacks inventories of its resources. The BLM should invest heavily in inventory of its forests, range, water, wildlife, fish, plants, cultural resources, recreational opportunities, minerals, roads, facilities, and invasive species. Often times the BLM relies on outdated information in its NEPA documents. This is the basis for much litigation.

The BLM severely lacks staff at all levels. Compare BLM with the Forest Service or Park Service. This basic lack of staffing creates gaps in process that results in increased vulnerabilities to litigation. There are just not enough people to do the enormous jobs that are asked of the existing staff. The staff that are there do their best but it seems to be not enough. Increase staffing at the Washington Office, State Offices, District Offices, and Field Offices. Increase training.

Be honest with local agencies about constraints placed on BLM as a federal agency. Some things they may want aren't legal and if they know that right away it can avoid disappointments later. Also let it be known that there is considerable decision space within those legal boundaries.

I think the only way to work with most tribes is by going and talking to people, not asking them to comment by mail with a deadline. Not all tribal officials represent the general opinion (true also of county commissioners) but you can usually find someone to give you a summary what's most important to them.

Follow NEPA, don't try to cut corners. Someone will always find a flaw in the document.

By doing things right the first time, especially transparency and respecting and valuing public comments in the NEPA process.

By taking more time to listen to the public early on, and then develop alternatives based on the main issues people bring up, you can avoid taking a lot of time after the fact dealing with appeals, document re-writes, and litigation. When people can see by reading your documents that you listened, not necessarily doing exactly what they suggested, they are less likely to challenge.

Remind the administration that NEPA is a law meant to help agencies make better decisions and incorporate the values of the people whose land this is. Complex and far-reaching decisions take time to reach, if done properly. "Streamlining" to make it go faster will only result in more lawsuits.

See page i, # 4

Listen to your general public.

Listen to your general public.

The oil and gas EAs are all nearly identical - cut and paste - EA after EA after EA. It's because of the huge workload that EAs, especially oil and gas, impose on small BLM staffs, which are all relatively small throughout the west. It's far better to have one programmatic EA for each oil and or gas field. Of course as noted before, oil and gas area-wide or fields should actually be environmental impact statements instead of EAs. The impact is due to effectively removing all that land from public use for decades and maybe even permanently, though BLM will always state that it's temporary. It's not a lie but it's not the truth either.

The Burning Man EA, at least the first ones, circa 1997-2000, by their size, looked more like environmental impact statements - they probably should have been, because the event areas have footprints similar to open-pit mines, though Burning Man does not remove public lands from public use like open-pit mines and oil and gas fields do.

Make your analysis thorough and honest. To cut corners on scientific analysis would be like cutting corners on the Bill of Rights.

Begin with the premise that nature does not reign over humans, but rather is subject to our benefits, and to be maintained for our benefits

Remove all legal barriers that fail to pass the first criteria in Solution 1

Consider the scale of consequence a decision might have. Small actions may have large consequences.

The BLM NEPA Handbook from 2008 identifies issue-based NEPA which is efficient and focused. However, most offices do not employ this method. We even see some "kitchen sink" documents. The solution is to increase training for staff and managers.

Use the guidance already given. If it's a full field gas development in the last habitat for sage grouse, it's a no-brainer, do an EIS. NEPA regs have a complete and easy to understand list of things to consider when deciding.

If public scoping or known significant issues indicate an EIS is likely to be the best level of analysis, don't do an EA first in order to get out of it. It will only extend the time it takes.

Please do NOT change the NEPA process currently in place.

See page 1, # 4

Don't try to shortcut the NEPA process or rush projects through without a thorough analysis of potential environmental and cultural impacts.

Do not cut out or disregard public input on a proposed action. All concerns must be addressed and potential impacts mitigated.

The level of NEPA analysis could be adjusted according to the level of environmental / cultural impact anticipated from the proposed project. Pre-scoping with affected stakeholders would be a great way to gather early information on project impacts. This would also help build trust.

Have bipartisan support of all decisions and documents.
A central digital repository, of course, with templates of all standard forms, letters, etc, for any BLM-associated person or entity that needs to file a report can do so anywhere. An app would allow wide access with trackability, encouraging report filing in the field & immediately. Monitor the input to verify quality of reporting, at least until the practice of immediate & standardized documentation is worked into the culture.

Always err on the side of more/better/further analysis. When trying to match analysis to scale of action, it is far better to be on the 'good data' side of things than the 'missing data' side. Set specific standards that must be met to classify an action or an analysis, then take that standard & create a numerical or other score which can be matched with each other without doubt.

Better science. BLM science seems very targeted towards industry.

Local communities are not engaged early in the process and listened to.

Gain trust first then reducing NEPA to match the scale of the action will be easier for the public to accept.

Better science on the big picture will help build that trust.

By being totally transparent in any and all projects and processes. By creating total community involvement through solicating community input and then by proceeding through the process and conforming to all local and state regulations, requirements and policies. Follow the rules of law in all BLM functions and exclude special interests in creating policies and procedures. NO special consideration for any organization or group without public input and guidance.

Simply spend the time necessary to study and determine all of the issues that will impact the project from the state and local standpoints. Involve te local community and get input regarding what issues need to be included in any analysis. ALWAYS consider the impact of any project on the involved communities. There is no "one size fits all" approach to NEPA analysis.

Making sure the process is followed and all stakeholders are involved should reduce litigation.

"Right-Sized" according to who? I do not agree with short-cuts and hope the BLM will not cave-in to corporate pressure to minimize the appropriate analysis scale.

push for compliance with law and policy

size your plans/nepa to the issue at hand-one size does not need to fit all

Return control of all Federally controlled lands to the States. Many of the problems that end up in litigation are due to the classic bureaucratic approach of thinking that one solution fits all of the related problems. Getting the Federal Government out of the way and letting the States handle the problems associated with the lands within their boundaries will not solve all of the problems but it will go a long way toward ensuring that decisions are legally defensible within the state.

Return control of the Federal Lands to the States. This would ensure that States such as California which wants to preclude any use of Federal (at that point State) lands can do as it wishes while other states can determine what is right for their citizens and their economy. By eliminating one large level of bureaucracy the size of the NEPA analysis can be reduced substantially. Not only will the analysis be more accurate but it will be cheaper and thus more cost effective.

Obstructionist and protester should left our of the process.

The should be a maximum time limit and number of meeting put on any project and if the time limit or number of meeting is going to exceed that number the BLM shall be required to immediately approve the plan.

Anyone who challenges a proved operating plan or plan that is approved by BLM shall need put up a bond in favor of the operator for its losses or delays and shall be responsible for all court costs including those of the BLM and the operator.

If the challenger of any action losses in court and does not have the money require to pay all of the court cost, for loss of time and profit then the attorney taking the case on the part of the challenger shall pay thos

No one should be able to make any challenge to a plan unless he can show that it actually effects his life and wellbeing.

No government agency should be able to file an action challenging an operating plan.

No NEPA required for operations under 20 acres in size or on already disturbed land.

No NEPA required on small mine where no hazardous chemicals are used

Do more public -interest pieces (PSAs) on TV and radio in high-concentration tourist areas

Clear and simple policy statements would help--in everyday English and also Spanish would help (NOT "legalese")

Get signatures from employees, volunteers and groups of regular users on wavers before receiving permits to enter certain BLM lands

Improve training of seasonal personnel

Consult with engineers qualified to assess environmental effects on water scarcity and quality, forestry experts on forested areas, wildlife authorities on environmental effects due to human encroachment, etc. BEFORE making any policy changes that will affect uses by stakeholders

Do not bend decisions when the agency is pressurized from particular lobbyists.

By doing the hard work in setting goals and policies. Do not bend regulations to industry folks including grazing, energy and recreationists. Some local flexibility should be possible between each management unit.

We can best create legally defensible documents by following the process to the letter. This doesn't necessarily mean analysis that goes on an on for hundreds or thousands of pages. Following the process is the single most important thing we can do to withstand legal challenges.

With that said, it is simply not possible to avoid legal challenges. They will happen no matter what.

I strongly recommend that the BLM revise the planning regs to eliminate the protest process. Let them go directly to federal district court which they will do anyway and save an average of 6 months or more on the process. This is the single biggest thing we could do to save time and complete plans faster.

Look at the issues involved, the likelihood of legal challenges, the stakeholders involved and the overall level of risk. The level of analysis should match those factors. Too many times, we analyze the impacts of non-issues. This is partly due to the tendency to cut and paste from past documents without really thinking.

Strengthen science-based decision making.

Accept the fact that legal challenges are part of the process.

Preserve flexibility for future uses by not allowing impairment of resources.

Recognize that NEPA analysis is not tied to the scale of the action but rather that an assessment of IMPACTS and consideration of alternatives is required. In other words, a small scale action may have major impacts and many alternatives may exist.

Place ethics and public benefit over private gain.

Take into account the stewardship history and reputation of any party to a BLM agreement. For example; a mining company with a history of leaving toxic tailing ponds behind is an obvious bad choice for future dealings especially compared to say an outdoor sportsman 's group that practices and promotes low impact activities.

Quit locking up lands for national monuments and wilderness.

You need to have Congress change the laws that are allowing the law suits.

The NEPA rules need to be changed.

Have an Attorney review documents before forcing them on the public. It should be obvious when something illegal, unethical, or unconstitutional comes down the pike. Defer to attorney, not big campaign contributors.

If the action PROTECTS THE ENVIRNOMENT, then that would seem to be just the right amount

Do not remove NEPA

Seems like, if all parties were involved, there'd be less chance of litigation. As an organization, your 'feet on the ground' would have to build trust.

Scrupulously comply with all legal requirements during the planning process and create a paper trail documenting all actions as they are taken.

Make your decisions based on science and the law. Do not try and circumvent the legal process.

Less higher manager federal oversight, more decision making ability on the part of local field employees, and more training for local field employees so they know exactly how to do their job right.

This is the million dollar question, you CAN'T. If you take shortcuts, it will be appealed. Especially since most the RMP/forest plans in the west were just completed with sagegrouse-tied requirements. You HAVE TO ATTACK THE CAUSE, the Non-profit interested publics status as "non-profit", and 2) make frequent filers of appeals pay a large upfront fee to appeal. If they lose, the federal government gets the money. NEPA is driven by the appeals process.

Perhaps create programmatic nepa documents that allow for small scale actions that would require then to not be analyzed everytime for NEPA. Take for instance livestock trailing. Just give them the okay & cover it in the RMP's/forest plans, or allow CX's of such small insignificant actions.

TEST2
During legal proceedings, the BLM should not agree to any continuances from the opposing party. In addition, when feasible, BLM should move for expedited proceedings.

Prompt discovery by BLM during litigation. If other parties fail to provide discovery, BLM should move to compel, quickly.

Do not remove NEPA

Comply with the law governing the NEPA process in all actions.

Always err on the side of environmentala protection and more analysis rather than less.

Limit the ability of professional interested publics appeal rights on the types of NEPA, it will allow for the smaller, less in-depth NEPA documents. If you don't limit the appeal rights of these interested publics, it will just be held up in court, netting you nothing.

TEST2
"One size doesn't always fit all." Perhaps proper training of BLM employees to determine what is "right-sized" on a case-by-case basis.

Stop listening to a handful of uninformed government officials and individuals who want to give away our public lands and allow them to be destroyed.

Protect and preserve more BLM lands such as lands with wilderness characteristics and convert them to wilderness areas that will be protected and preserved for all time. The San Rafael Swell area and all wilderness study areas in Utah should become wilderness areas. This would show the public that the BLM has the best intentions for our public lands.

Make more lands off limits to oil/gas exploration, off road vehicle use, grazing, and other activities that destroy the lands. Period. No potential leases, etc. Get the profit factor out of our public lands.

You can't. There is so much out there that we still do not understand about the environment and there are many more discoveries of cultural resources to be made that a thorough environmental analysis has to be made.

Keep all BLM lands off limits for leasing and OHV activities. Then you would not need NEPA analysis.

Advocate for long lasting preservation of clean water and clean air.

none.

Firstly do scientific research by independent or university-based researchers. Do not rely on old past research that may be flawed or not accurate or not current.

Never allow industry or local demands to outweigh the results of research.

Realize the long term consequences of any projects- take the First People "7 generation view" of the environmental consequences of development.

Realize that there is one world, one environment. It is interconnected. Environmental scopes are necessarily large. Do not shortcut or diminish research. That prevents legal challenges if the law if followed.

Use scientific information to identify the scope of projects.

NEPA documentation is often inaccurate, overstates data/science, references science papers/studies which are also inaccurate or biased or both. This practice needs to be corrected. Publishing the truth will reduce litigation.

BLM needs to understand and use an "Incremental NEPA" as often as possible to save time money.

BLM defaults to NEPA on almost every project. BLM needs to relax the rules to allow more projects to be satisfied with an EA or CE.

acknowledge seasonal aspects of public participation and seek dates that maximize potential public input

get as much upfront buy in from diverse interests as possible

make sure to include as many points of view as possible before creating drafts docs

get rid of the comparative proposal process that requires including extreme alternatives that have no chance of being approved. concentrate on the alternatives that are closest to real compromises

Small tasks should not require the same level of analysis as large ones

quick fixes need to be made easier to do

Litigation can be reduced by returning the Equal Access to Justice Act back to its original intent.

Revisiting the effectiveness of the endangered species act, considering recovery goals than habitat.

Limit Litigation.

One size does not fit all. Match the size of the NEPA analysis to the size of the project.

Flexibility would be useful in adapting NEPA to the size of the project.

Help involve organized groups to do on the ground work with partnerships and working together with grant ideas.

In Arizona I have been organizing meetings with the user groups and the agencies to start a dialog and build partnerships. This is working because we are all there because we were invited as participants.

Figure out a way that the groups that continue to file the law suits do not get reimbursed for them. Make them responsible to pay for their work. The motorized community does not get paid back for any lawsuit that is filed. This does not make it fair. If the paying field was a little more even maybe the lawsuits and litigation would decrease.

Collaborate as one with State, USFS, COE agencies

Consider everyone's issues, not just those that can pay for lawsuits.

Less paperwork and obstructions are the best way to do that. But finding a way to do that is very difficult do to federal regulations.

Is it possible to look at all of the areas that require NEPA and maybe come up with a scaled down version for areas with less environmental and habitat concerns. This might help with the amount of work involved.

Do not hold special meetings with specific user groups. Private meetings with specific groups make other users suspicious.

Place importance on local knowledge of game habitat, use data, and historical importance of areas and trails. Not everyone is a scientist but it doesn't mean that what they tell you isn't true.

Invite public participation.

Don't know.

Apply the Grazing Rules to All Programs/Projects. For several years Congress has required through the Interior Appropriations Act, that administrative remedies must be exhausted, prior to a litigant submitting a case to a federal district court. The special case should be applied to all programs/projects, not just the grazing program for those agencies that have an administrative protest and/or appeal process. For those agencies that do not have an administrative appeals process, such process should be created.

Amend the NEPA and Include Statute of Limitations on Litigation. There are no statute of limitations provisions under the NEPA. As a result, litigation is governed by the Administrative Procedures Act. Under the APA, the generally accepted statute of limits applied is 6 years. The NEPA should be specifically amended and include the following time frames: categorical exclusions – 3 months; environmental assessments – 6 months; environmental impact statements – 2 years.

The NEPA and NHPA apply to discretionary federal actions only. Under the 2014 National Defense Authorization Act (PL 113-191), Under Section 3009 (a) (2) (A), Congress directed the BLM to convey public lands to the City of Yerington. The "action" before the BLM was to comply with the Act ("…the Secretary shall convey…") which is non-discretionary. And yet the federal agency spent money and staff time to comply with both the NEPA and NHPA. 40 CFR 1508.18 should be amended and state that mandatory Congressional acts are not a "major federal action." The NHPA should be amended and state the same (aka not an "undertaking").

Amend the Recreation & Public Purposes Act. Under this Act, certain federal lands can be leased or conveyed to States or local governments for recreation, schools etc. The Act needs to be modernized that clarified that when a project meets the criteria of the Act, that the convey of land is required and is not subjected to any land use planning (such as section 202 of the Federal Land Management Policy Act). There is no federal interest in a local government bundling a school on public land and leasing the parcel to them. All Act 'actions' should be to convey the land out of federal ownership at fair market value.

Give the land back to the states.

Give the lands back to the states.

I have no idea.

Have less secrecy in developing the project. What is the point?

Limiting the scope of the review will limit the challenges. Smaller projects and shorter time frames will help.

Prepare and use more templates to aid the project. For example, information regarding impact of climate change in an RMP is largely the same across the nation. Headquarters could draft the basic material so each field office only has to work on specific issues related to the uses they are considering. Even then emission impacts associated transportation, solar fields, wind towers, an oil well, etc and not going to differ greatly from place to place so prepared information could be used several places and then updated as needed.

Actively listen to and understand protests that are part of the process. Consider meeting with the people filing them to improve understanding. Consider mediation sessions between some of the parties prior to finishing the process.

Mandate the use of the lowest level of review possible.

Have employees justify the need for an EIS.

Slow down and follow the existing NEPA process. It works if you follow it.

If the environment is in danger, all efforts must be taken. Size of project should not matter. Follow established NEPA process. It works if you follow it.

Do it right the first time: include the input of ALL stake holder and users.

Need more tome for analysis

Litigation has become its own industry. Special interest groups exist based on their ability to claim harm and obtain court settlements. Short of legal system reforms, one solution is to increase the level of proof required to assert damage. The only way to reduce the delays is to focus on the costs and benefits of challenges. If a group can receive disproportionate benefits relative to its costs of a challenge, challenges will abound.

By hiring highly trained personnel or training existing personnel and demanding all agency personnel follow the BLM's laws, rules, and regulations and not their own personal wants, desires, or opinions the BLM can create more legally defensible documents and avoid the delays associated with legal challenges.

- Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

By having agency personnel stay on task during the NEPA process and not taking outside detail jobs such as firefighting during the summer months when field information gathering is most important the BLM can create more legally defensible documents and avoid the delays associated with legal challenges.

- Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to backcountry recreation enthusiasts.

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

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Need more time for analysis

NEPA protects our environment and citizens. Environmental analyses should be thorough.

Identify assumptions: Perfection does not exist, perfect knowledge does not exist. The impact of man is often overstated. Analysis should begin with a better understanding, or at least acknowledgment of the earth's immense creative and destructive powers that have existed for 4 billion years. The impact analysis should be able to identify how human action will be different from the existing natural processes.

No input

- Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

- Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

- Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

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• Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

• Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

• Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

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By tracking legitimate background paperwork before reaching courts

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• Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Open communication up front would avoid litigation later

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		Have an policies thoroughly legally vetted ahead of time.		Good question.	
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• Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.	• The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	• Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.			• Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	• Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.
No decisions without public input	Know that the public is watching & we care about what happens to our land	Make wise decisions	Be truthful in decisons	Keep solutions simple	Keep everyone aware	Keep things simple	Do not destroy what we have
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		Gain the collaboration and input of as many stakeholders and community members as possible so no one feels ignored or slighted.	Base decisions on data-driven, factual science that promotes the well-being of the land and the people before any other types of gain, such as profit, development, or mining of natural resources. If the greater good of the earth and the land is the number-one priority, then it will be less likely to face serious opposition from the majority of the people.			Shortcuts are never good solutions and should be discouraged.	Always make sure to have the latest scientific data applicable and to continually revise based on any changes in this information.
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		Base decisions on the best available science	Weigh ecological needs as highly as resource use and extraction	Keep the public well informed with early and frequent opportunities for input	Weigh the input of the general public as heavily as that of the extractive industries	base plans on the latest science and public opinion	Plan across BLM and other boundaries to broaden the scope
		Get a good lawyer				No clue	
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conferences including all parties	spend a day with .... tours of ..... multi agency scenario modeling, facilitated meetings	transparent science based decision making, providing transparent opportunities for participation	rational and agreed upon goals for economic development and ecological conservation	a good foundation of understanding the needs of all groups and a adhered to process that doesn't skip stages or is not transparent and multi agency/cross boundary participation	
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

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hold clearly advertised meetings - LOCALLY (not held 500150 miles away)	enlist LOCAL persons to hold LOCAL information meetings.	carefully craft ALL proposed actions	consider LOCAL conditions when crafting proposed actions	do NOT take actions without LOCAL input	carefully consider PEOPLE before government income	LOCAL input	LISTEN to LOCAL input
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• The BLM to make it easier for states to share data on wildlife management, wildlife migration corridors, habitat data, scientific information important to hunters, anglers, and backcountry enthusiasts.	• Tribal governments should participate, and the BLM should make efforts to reach areas that lacking electronic communications.	• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	• Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			• Do not encourage shortcuts that a plan is vulnerable to legal challenge later in the process.	• Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

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Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

This is a tough one. Be open when presenting a plan, be ready to accept new scientific ideas. Be willing to discuss in all media why you are making the decisions. Open and transparent discussions with a willingness to work together is best. There will always be someone who will sue, take steps to reduce the number of people take this step.

No shortcuts ever. Ask for public and scientific advice. Let you state, district and local personnel work with you.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

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Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Don't enter into agreements that are against the will of the people to leave our lands and wildlife alone.

Support the public's interests in protecting our lands and wildlife.

Primary purpose is to protect the land and wildlife from those who would try to exploit it and use it for their profit.

Protecting what is does not require extensive planning other than repelling profiteers.

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications. Ask the tribal elders the best way to communicate with their tribe.

Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process. The Endangered Species Act is under great threat right now. Working with wildlife groups early on along with industry may cut down on problems.

I'll say it again, science is not the enemy. Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

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Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Greater collaboration and sharing of ideas would result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Provide enough complete information that a plan will not be vulnerable to legal challenge later in the process.

Base plans on the latest information, science (impartial, non-partisan, peer reviewed data), policy, and public opinion. Produce environmental impact reports.

Allow and encourage BLM managers to broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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		Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.	Do not take short cuts.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
		Greater collaboration will reduce legal challenges. It is more time consuming in the short run, but is more efficient becasue it will reduce the delays associated with legal challenges.		Do not short cut and leave the plan open to legal challenges.	Base plans on current science and address public opinion.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications. They should participate in the management of bison, and wild horses and protect them.

The public land belongs to the taxpayers and not ranchers or the oil companies. We refuse to exchange the lives and souls of wild horses, bison, wolves and other wildlife just so ranchers and the big business can make a profit. Release all the wild horses in holding pens and kick all cattle and big business off of OUR public lands. As long as you permit ranchers and big business on OUR public lands, we will continue to sue you. For any wild horses in holding pens, you MUST provide shelter. Keeping these horses in holding pens is costing the taxpayer a lot more money and we want them released.

Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Adhering to science-based decisions, considering ecological as well as economic values, balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

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Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Govt has got to remember you are not a Monarchy

Don't brush issues under the table, remain transparent so the pitfalls are clear and obvious before negotiations and planning are undertaken.

Have respect for the science related to the environment, the eco-system of the land, and the needs of wildlife in long-term sense, not just profits from economic development that might in some cases be harmful.

Reach out widely to related areas and people and take all sides and issues into account to establish the need for an environmental impact study. Better sooner than later, and again, leave room for changes for unexpected events or climate changes.

Environmental protection laws can never be tossed aside

Collaboration must be done beforehand, rather than during passage attempt

Do not take shortcuts

Do not skip environmental impact statements

The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

Put more effort in the foundation of the plan = less effort later. More specifically, greater collaboration and sharing of ideas in the beginning, will result in fewer challenges (e.g. delays & lawsuits) later.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an EIS, do NOT skip that step.

Let BLM managers broaden planning to the district or multi-field office levels as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

- Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

- Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

- Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

- Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

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Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

Use science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Avoid encouraging many shortcuts that a plan is vulnerable to legal challenge later in the process. Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

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Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Starting with science-based decisions, with ecological values considered, truly balancing responsible development with reasonable conservation, keeping the public well-informed with full transparency and providing sufficient opportunities for participation. Greater collaboration and sharing of ideas in a fact-based matter will reduce litigation.

Plans should be based on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step. Shortcutting this process leads to future legal challenges.

Allow BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process. See procedures of Participative Action Research (PAR) or consult Quaker literature for examples.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step. Proceed slowly, as if future generations depend on what you do. Think seven generations ahead.

the delays are necessary when outside influences are attempting to abuse public lands for personal profit!

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
		Follow the science	Collaboration and transparency to avoid surprises	Follow the science and public opinion	Be attentive to cross-border issues
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		Listen and try to accommodate ideas from others.	Base plans of sound scientific data.	Base plans on science.	
		Have a "settlement conference" before issuing documents or new rules. Negotiate first rather than litigate later.		The right size is the one that leads to the correct or best answer. Don't short circuit the process. That only leads to more litigation later.	Broaden the issues rather than constrain them. Let entire regions (multiple jurisdictions) determine appropriate responses.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

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Since both the socioeconomic system and natural biota are/will be impacted by global warming, the A,EbM management approach would be a good option.	Natural capital and ecosystem services in BLM properties needs to be integrated into the management plan (biotic; physical. chemical and socioeconomic aspects.	It often helps if local stakeholders develop agreements on contentious issues outside of the state/federal planning process. For example, when the Stellwagen Bank National Marine Sanctuary was formed in 1989, the environmentalists and fishermen/women agreed on allowing fishing, but prohibiting oil/gas development. When the Northeast Deep Sea Canyon and Seamount National Monument was designated in 2015, it became a no take wilderness area which ticked off the fishing interests. I got nothin' on this except for make sure your lawyers are more clever and committed than the ones for your opponents.	Since most NGO lawsuits are based upon procedural issues or legal technicalities, BLM documents should make sure that these problems are avoided.	Pre-consultation with various stakeholders before a project plan is developed can provide a solution to erring in haste and repenting at leisure.	BLM needs to match the project plan with the local/state/federal management entities and ensure coordination and cooperation between the management entities and impacted public/stateholders. A good example would be the Cape Cod National Seashore and outer Cape Towns. Wellfleet and the CCNS are developing a joint plan for the Herring River salt marsh restoration project which is a "Blue Carbon" endeavor. Here again, I am out of my league.	There are negative lessons to be learned from the dispute between the Monomoy National Wildlife Refuge and Town of Chatham dispute on control of the bottomlands and fishing practices/coastal erosion. With Relative Sea Level Rise and storm related (Northeasters and Hurricanes) leading to coastal erosion and land accumulation elsewhere, this problem will continue into the future.
		• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process. • Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			• Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process. • Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step. • Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.	
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Encourage tribal governments to participate, and make special efforts to reach those without electronic communications.	Base your decisions on science, If science or public opinion, keep the public well informed, and provide numerous well-publicized opportunities for public participation.	Focus on collaborating and sharing ideas. Though more time-consuming in the beginning, that will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end.		Avoid shortcuts that could make a plan vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

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The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process. Provide sufficient review time and public hearings to listen to the science and make sure the decision is sustainable for the long term environment.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
		Adhering to science-based decisions, science is always legally defensible			
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. Tribal governments should be encouraged to participate. The BLM should develop a procedure to follow when an action involves tribal lands since my people in these areas lack access to electronic communications.		Using science when making these decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation will help minimize any legal challenges.	Greater collaboration and sharing of ideas among all the interested parties, in the beginning, will result in fewer challenges.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, prepare the impact statement as soon as possible.	Do not rush a plan through. This will only lead to more legal challenges.
		Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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Utilizing input from Question D, economic, human created changes, and conservation of existing conditions combined with scientifically verifiable physical, ecological, environmental and location data create a consensus plan to start with.

Base plans on the latest applicable information, science, policy, and public opinion and any possibly needed environmental impact statement. Use the fewest and simplest resource management plans possible to cover all aspects of the action.

Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

- Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

- Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

- Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

This is important. Make sure every voice feels heard by providing ample time and addressing their views in the written solutions and documents.

Verify data to be sure it is up-to-date and not taken out of context.

Don't try to take shortcuts. Include a complete environmental analysis.

Let BLM managers broaden planning to the district or multi-field office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

- The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

- Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

- Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

- Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

- Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

- Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

- The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

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Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Ensure all documents are clearly written in plain language to eliminate the possibility of misunderstanding. Technical jargon can be translated into plain english or whatever language is needed for the intended audience.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Make it easier for states to share data like wildlife management data with the agency and vice versa, like in the identification of wildlife corridors and other scientific information of benefit to outdoor recreational enthusiasts, be they hunters or fishermen.	Tribal governments should be encouraged to participate, and the BLM should reach out to areas on tribal lands that lack electronic communication access.	There should be a greater collaboration and sharing of ideas to avoid lawsuits.	Adherence to scientifically based decisions, considering ecological as well as economic values would be of great importance and would balance responsible development and reasonable conservation, keeping the public well informed and providing opportunities for public participation.	I would recommend not encouraging so many shortcuts that a plan is vulnerable to legal challenge.	Base plans on latest scientific information, policy and public opinion.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
I would like to see a way in which those with a vested economic interest in the plan (ie, those paying BLM fees) are clearly identified when providing input by stating what and how many leases/fees agreements they possess. Their short term interests need to be balanced with the long term future interests of American people.	Don't send mixed signals. Perceptions of bias of those convening or facilitating the process or in the information available contribute to lack of trust.	Adher to science-based decisions, and to long range forecasting of ecological impacts when evaluating shorter term economic interests of stakeholders. Keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Be sure to include regulatory and other legal sources that are covered by the planning process so general public can understand constraints. If a regulation would have to change to allow a proposal, stipulate how that regulation would have to change.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Develop a process and encourage BLM managers to broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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- Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

- Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

- Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should reduce lawsuits.

- Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

- Base plans on the latest information, science, policy, and public opinion, and weight each one appropriately (public opinion nor policy should ever outweigh science when it comes to the safety and health of our environment). If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

- Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

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Base plans on the latest information, science, policy, and public opinion, and weight each one appropriately (public opinion nor policy should ever outweigh science when it comes to the safety and health of our environment). If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Share data such as wildlife, habitat data with others

Include the Tribal agencies

Share ideas and be open in collaborating with others

Stick with science based decisions; animals and plants need a place to live too

Economics is not the only consideration, we need to preserve wild life and habitats for future generations.

Don't take short cuts, this leads to legal challenges

Be sure to include science as well as public opinion and an environmental impact statement

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This includes the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

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Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

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Tribal governments should be encouraged to participate and the BLM should make special efforts to reach areas that lack access to electronic communications.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed and providing adequate opportunities for participation should reduce legal challenges.

Greater collaboration and sharing of ideas with all impacted entities, while more time-consuming to begin with, should result in fewer challenges and help avoid delays and lawsuits at the end of the process.

Base plans on the latest information, science, policy and public opinion. If the science and /or public opinion indicate the need for an environmental impact statement, do not skip that step.

Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and to simplify the number and complexity of resource management plans.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

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Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

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Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

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Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

It is always important to remember to keep the public involved in whatever process you use.

It is always important to keep the public involved with whatever process you use.

Stop slaughtering programs

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Again some of this covered in 'A'

Everyone who may have ideas needs to be included and have an opportunity to reply.

Also sound science is critical to the underpinning of these activities and all participants would have a way to easily read and hear the background or science-based decisions

All this takes time and transparency so that science, policy and public opinion are considered.

Consider environmental impact statements be completed and again shared with all in ways previously discussed.

Keep the lines of communication open at all times by inviting extemporaneous comments.

Negotiate in good faith with stakeholders.

Get representative stakeholders in a room together to clarify the tradeoffs and conflicting interests before taking legal action.

Consistent practices and thoughtful analysis allow supportable extrapolation from limited data.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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Again the biggest solution is allowing the public input along the way with meeting and announcements highlighting progress or problems		balancing impacts between the public and the BLM through direct input and transparency of the project Involve lawyers with environmental expertise to participate	balancing science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, which can be obtained with meetings etc.	allow meetings with open forums to allow discussion	don;t take any shortcuts	always base the decisions on the most current science and environmental information available
data sharing via collaboration with tribal councils, federal/state agencies, environmental groups, ranchers, land owners, energy development companies, concerned citizens		Use collaboration in the early stages of planning; collaboration and transparency will decrease lawsuits over the long term	Use scientific data and be transparent about discrepancies		avoid shortcuts to prevent litigation	allow BLM managers to broaden planning to the district or multi-field level to better address cross boundary issues
Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.		Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

		Use common sense. Make decisions that allow the local district to do work and expansion, within plans, without having to come back for public review.			Make the analysis fit the project. Replacing a culvert should not require a NEPA review. Removing a tree that is causing issues for those recreating should not require a NEPA review. Common sense.	
		Collaborate	Open transparency	Set up a mediation process	Be thorough and open to scrutiny.	Get public input in a step by step process
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

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• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

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Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

- Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
- Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Work with tribal governments and reach out to them, and especially those in areas without electronic communication.

Collaborate and share ideas in the beginning of the planning process to avoid later challenges, delays, and lawsuits.

Stick with scientifically based decisions and balance ecological and economic needs. Engage in responsible development that takes conservation seriously into account. On the economic side, consider the long term, not just short term extractive goals.

Keep the public informed, keep the development responsible. Allow participation. These steps will reduce lawsuits.

Avoid shortcuts to avoid legal challenges.

Don't circumvent environmental impact statements or the latest in good public policy and science. Don't ignore your own scientists. Stop firing them.

• The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	• Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	• Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		• Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	• Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
Bring all stakeholders together to share ideas early in the process.	Keep all parties informed every step of the way.	Begin with sound science.	Do not politicize the problem or viable solutions. Deal on the merits of issues raised and address all concerns.	Follow suggestions in steps A - D. Be professional and be transparent.	Be aware of work already done that is similar in nature. Have a library of relevant studies and outcomes available for all interested parties.	Hold meetings early in the process with stakeholders to avoid confusion and wasted effort.
Do not rely on consultation with the proponents or opponents of a particular project to determine the project's impacts. Conduct an independent study under direct supervision of the BLM.		First and foremost assure that the information in the documents is trustworthy.	Follow the principles used for Questions C and D: Transparency and Good Neighbors.		Don't worry so much about the size, but whether the NEPA process adequately covers the important factors. A bigger project will have more components, requiring a bigger document.	
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.
		Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	
		If you listen and cooperate with involved communities, litigation would be much less likely.				
Demographics tht have historically been ignored need to be encouraged to speak up and given a forum.		Getting everyone on board to begin with will limit the legal challenges down the road.	Base decisions on solid and well researched scientific studies so that it is defensable beyond any doubt.		Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step	Recognize all of the citizens and area's that will be impacted so that you can do a fully and accurate assessment.
The BLM should make it much easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications. This is extremely important!	Greater COLLABERATION AND SHARING OF IDEAS, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly BALANCING responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		DO NOT encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base ALL PLANS on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, DO NOT SKIP THAT STEP!
Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.	The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Begin by having a clear understanding of the applicable laws and the purpose of those laws. Again, BLM's primary constituent is the land and its ecosystem. Making that clear will remove many objections and causes of action.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Every action has more ramifications than BLM is interested in exploring. "Right sizing" implies that under some circumstances it is acceptable to do minimal review of a proposal. That is not acceptable. Start from the broad questions. If the proposal is truly minimal, the analysis will narrow itself. Without asking the broad questions first, it is only too likely that only one aspect of a proposal is addressed, leaving questions unanswered and adverse impacts undescribed. Narrowing the scope of an analysis too soon leads to more work later and the very real possibility of adverse impacts unconsidered.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
		The big land grabbers have a great deal of money to put into their quest for profit. There is no way to avoid some of their efforts. You need a legal defense fund and need to reach out to other users and organizations for support	Get the public involved early but wide spread publicity.	Make more use of nationally based "conservation, hunting, and environmental groups. Reach out to them like your agency use to reach out to beef, sheep, mining, petroleum and other destructive user groups. This is public land! Emphasize non-destructive use and insist that the land and water be returned to its original state at the user's expense.	
It must be easy for states to share data-especially wildlife management date with the BLM. Data would include wildlife migration corridors, habitat data, and scientific data important to hunters, anglers and outdoor recreation enthusiasts.	Tribal governments should not be forgotten. Special efforts may need to be taken to reach areas that lack access to electronic communications.	Greater collaboration with all stakeholders and a sincere desire to understand all concerns could possibly result in fewer lawsuits and delays during the process.	Decisions should be SCIENCE based. There should be consideration of ecological as well as economic values. Responsible development should be balanced with reasonable conservation. If the public is well informed and able to participate, lawsuits should be reduced. If people feel like they have been run rough shod over by the government, resistance will be the result.	Shortcuts in planning process can lead to legal challenges later in the process	Plans should be based on the latest information, SCIENCE policy and public opinion. Environmental impact statements are a necessity if science and public opinion point to the need.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
		Difficult. Front-end agreements of stakeholders and interested parties would help, but not prevent litigation. It only takes one. That is a tough one as Attorneys are the most prolific money makers, of all occupations. You are up against the legal industry (Check out the yellow pages). You would need an extremely savvy one to be on your side in working out those plans.		Base it on cost, acreage, stakeholder rights. For example, tribal rights trump all. Mother Nature's processes should always be front and center and not capitalistic 'developers'. You should always be looking all the way down the watershed, so to speak, for the harm that may be done. Example: If a certain frog's habitat is in question, the developer can not get away with just saying that the pond, which is their breeding ground will not be impacted by the development up the hill. Frogs do not spend their whole life just breeding by ponds. They forage and have places to go, and other frogs to see. If you get my drift.	
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
		Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process. Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
The BLM should make it easier to share data on wildlife management such as migration corridors and habitat.		Greater collaboration and sharing of ideas.	Using science based information. Looking at ecological concerns in addition to economic.	Be thorough. This means no short cuts that can lead to challenges later.	Base plans on the latest information, science, policy and public opinion. If an environmental study is warranted, don't skip it.

The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.		Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Let BLM managers broaden planning to the district or multi-field office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.
Make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Encourage tribal governments to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas takes more time in the beginning but means fewer challenges in the long run plus will help avoid delays and lawsuits at end of process.	Reduce lawsuits by: adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
The BLM should let everyone involved share data they have about the area.		The BLM should base the plan on the latest information, science, policy, and public opinion.	If science sees a need for an environmental impact statement, the BLM must not skip this step.		
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.		Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process. Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	Let BLM managers broaden planning to the district or multi-field office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.
Make it easier for states to share data----- particularly wildlife management records, endangered species of plants and animals data---- with the BLM and make it easier for all to data share.	Tribal governments and their members should be encouraged and helped to participate. The BLM must be particularly sensitive to the lack of access to electronic communications.	It begins at the start: Spend the time at the outset to collaborate and share ideas. Don't be afraid of controversy at the start. Time spent at that stage will prevent much on the back end.	Adhere religiously to science-based decisions. Consider the ecological as well as economic values but truly balance responsible land development with absolutely necessary conservation, keeping the public well informed and provide opportunities for participation in the process.	Do not encourage or support so many shortcuts the the plan is vulnerable to legal challenges later in the process.	Base plans on the latest information regardless of the source whether science, policy or public opinion. If either science or public opinion point to a need for an environmental impact statement, DO NOT SKIP THAT STEP!
		• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process. • Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		• Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process. • Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step. • Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans	
Have regular meetings, as well as special meetings when you hit a snag, that includes all of the bodies you've listed as well as interested citizens.		Might want to invite some activist organization lawyers to your meetings.	Again...same answer...invite interested and affected parties to the table using a variety of means to make sure everyone knows what you're doing and when then can show up and participate.	Issue your invitations to participate, updates, and reports in plain English in the beginning, with required references to documents and laws listed at the end.	I'd have to see examples to intelligently comment any further about this one.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process. • Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.
Make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be LISTENED TO and encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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Don't assume that special language shortcuts are understood by all participants. Avoid jargon. Avoid regional nicknames for common locations and processes.		Use clear and common language and test the documents on the general public to ensure clear communication before conflicts arise. Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits. Collaborate early and often.	Consult the legal personnel of non-governmental organizations to understand their particular concerns. Use most recent science.	Ensure that actions which have effects outside of the BLM administered areas are considered. Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step. Don't do or offer shortcuts.	Consult academic leaders in the areas of science where impacts might be occurring.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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Include the state and local governments, tribal partners, and other stakeholders into the decision making.		Don't until a true and legal system is instituted.	Ask the public to participate in making the decisions.			Reduce it to plain language before "translating" it.	
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
Collaboration should begin early, before scoping, and allow everyone to tell BLM their wishes and concerns for the planning area		Adhering to science based decisions, consider ecological values over economic considerations. Keep the public well informed				Don't encourage shortcuts that make a plan vulnerable to legal challelenge.	Base plans on latest scientific data. Include policy and public opinion. If needed, or requested, complete an environmental impact statement.
Do not separate Native American's from non-Native American's while discussing the issues. Work to help each understand the others' stances.	Be present, not just for meetings, but year round so you can understand what the land means to the people, and how culture plays into it.	Be transparent and respond in a meaningful way to queries.	Keep your focus on your legal mission.	Be honest, clear in your answers and recognize where the plan varies from the direction some groups had wished.	Provide a timely appeals process.	Do the thorough analysis any project deserves.	
		If you have more buy-in on the front end there should be less in the way of challenges. It makes logical sense. Also, every decision cannot be based on the bottom line, so making sure comprehensive evaluations are done with sensitivity to all viewpoints is crucial.				Honor science, honor facts, honor sensitivities to the environment and nature, be open and do the due diligence from the start should help to bring things to successful conclusions more gracefully. Be transparent. Be comprehensive. Again, it's not always just about the bottom line.	
accept info from all sources from data	integrate suggestions from all sources to action	respect those who have other facts Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	respect and integrate the to the needs of the local community	think about something besides money	understand that many want the environment and nature preserved as is	understand that every decision you make affects a broader area Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	review the latest scientific facts
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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- The BLM must make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to a wide variety of users.

- Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

- Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

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Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

get all parties to agree to documents, especially the environmental groups.

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Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

N/C

Close legal loopholes designed to subvert the public interest in favor of profiteers.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts. Why not benefit from free private expertise?

Tribal governments, which are deeply affected by BLM changes, should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process. We want partners, not adversaries.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Assess the degree of complexity in an action, which may be a more accurate guide than the scale of an action.

Conducting in-depth analysis and public input early on results in fewer delays and legal challenges down the road.

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

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The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.

Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

Don't allow private energy interests to destroy public lands. Once destroyed the lands are gone forever while the energy company moves on. Decisions that remove lands from the public can never be undone and should only be done in the most cautious, regulated manner.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

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Stop the greed

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Stop the greed

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Stop the greed

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

Adhere to science-based decisions; consider ecological as well as economic values; balance responsible development with reasonable conservation; keep the public well-informed; and provide adequate opportunities for participation.

Do not take shortcuts that make a plan vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

- The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

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If corruption and/or greed leads to abuse of the natural resources under BLM control then it is BLM's duty to defend those same resources from those who would exploit the land for their own short sighted profit.					
• The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	• Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	• Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	• Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	• Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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Input from tribal governments should be solicited, and the BLM should make extra effort to reach areas that lack access to electronic communications.		Better initial collaboration and outreach should result in fewer delays and lawsuits.	Adopting science-based decisions and emphasizing ecological values should reduce lawsuits.	Do not allow shortcuts that will make a plan vulnerable to later legal challenge.	If the science and/or public opinion ibdicate the need for an environmental impact statement, do not skip that step.
		• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process. • Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		• Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process. • Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step. • Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.	
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to birders, anglers, and other backcountry nature enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer problems in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Avoid shortcuts that make a plan vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

		Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Acknowledge climate change!			Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process. • Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step. • Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.	
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
		Greater collaboration and sharing of ideas will benefit everyone in the long run.	Stick to science based professional decisions that keep the environment and species preservation first and foremost. Development that isn't in the best interests of managing the land for the benefit of the masses should be discouraged and prevented.			Discourage shortcuts, due diligence should prevail and prevent lawsuits later	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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Easier for states to share data.	Tribal governments should be encouraged to participate.	Collaboration and sharing of ideas.	Adhering to science-based decisions.	Keeping the public well-informed.	Providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion.
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The BLM should make it easier for states to share data with the agency and vice versa. This would include wildlife migration corridors, other wildlife and habitat data, and other scientific information.	Tribal governments should be encouraged to participate at earliest stages of planning. Special effort needs to be made to reach areas and communities that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end.		Do not encourage shortcuts that make a plan more vulnerable to legal challenges.	Base plans on the latest information, science, policy and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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WORK WITH TRIBAL GOVTS! THEY'VE BEEN EXCLUDED FOR FAR TOO LONG.		Shockingly, if you put in more work in the planning stage it'll result in fewer changes later in the process.	FOLLOW SCIENCE!!!!!!	Shortcuts beget legal challenges. Just stop taking them.	Once again, SCIENCE!!!!
			Consider the ecological impact. In the long run this makes economic concerns sustainable. Don't use up the resources for short term gain. Make sure that you factor in long term economic growth, which only works when you take account of ecological concerns.		

• The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	• Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	• Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	• Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	• Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.		
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With these new Zones, and their overlays, based on this new database, create Ideal Long-Range Plans that incorporate ideal uses and protections, and start all planning using these Zones that are based on natural processes and features, with their overlays of current and historical uses, jurisdictions and ownership.	Allow access and input to these long-range plans, or Zones, from all parties, long before any specific areas of planning are proposed. When specific plans are proposed, make sure that transparency and open two-way communication are emphasized. As long as all parties know that Ideal Long-Range Plans are only an ideal, something to be worked towards eventually, all parties should want to work towards solutions that make sense for everyone, including future generations, and rather than a sense of disenfranchisement, a sense of participation and accomplishment.	If all agencies are sharing information and working together to create the Zones based on science and natural features, and the overlays that include all parties' interests, and if all parties, both private and governmental, are invited to participate right from the start, and if transparency is universally applied, the no-suprises approach will make any problems stand out right at the beginning, where they can be immediately addressed, before they can become the festering frustrations that incline towards legal actions.		The broad planning approach of the Zones will address the consolidation of separate yet interrelated areas of environmental planning long before any specific planning projects are tackled. Any resource management conflicts or cross-boundary issues will be apparent, and hopefully resolved, during construction of the overlay maps. These Zones and overlays will need the cooperation of lawmakers on a national level, but a fresh approach that greatly simplifies and unifies governance of our public lands, with transparency and fairness for all parties, is long overdue.		
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.		
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The BLM should facilitate wildlife management data sharing among states and the agency, including the identification of wildlife habitat, migration corridors and other scientific information that is important to back country recreation seekers.		"Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits" [Pew Charitable Trusts statement].	Collaboration and transparency always help.	Plans should be based on up-to-date inputs. If any inputs point to the need for an environmental impact statement, do not skip that step.	Shortcuts in planning make a plan vulnerable to legal challenges later in the process--so the BLM must do a thorough job.		
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.		
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Always put people and the environment before corporate profits.		Public Input	Transparency	Always put people and the environment over corporate profit.	Public Input	Transparency	

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

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Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

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Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Encourage participation of tribal governments, especially making efforts to reach areas where electronic communication may not be available.

Collaboration and sharing ideas may take more time in the beginning, but will make for fewer challenges later on, for fewer challenges and less likelihood of lawsuits.

Consider ecological as well as economic impacts, so that development will be responsible and include conservation, providing opportunities for participation.

Taking short-cuts makes plans vulnerable to lawsuits.

Make sure plans are based on the latest information, science, and public opinion. If public opinion points to the necessity of an EIR, make sure one is done.

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

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Well publicized and easily accessible information about opportunities for public participation - public meetings, comment periods, presentations, etc. - is essential to achieving well-conceived decisions and efficient project implementation.		Abundant public input is critical to good results. Increased public participation and process transparency leads to decisions that better address multiple and sometimes conflicting viewpoints, broader buy-in to the final decisions, and less resistance (meaning fewer delays) to implementation.	Streamlining should not be at the expense of public participation and transparency. Constraining opportunities for public input not only is an affront to democracy, but what is gained in near term efficiencies is more than lost in long term conflicts. A proactive, thorough, and inclusive public outreach process may delay project approval, but it will streamline implementation. A shoddy process will result in protests, lawsuits, and other project implementation delays while creating an atmosphere of distrust that will hamper future projects. Americans expect nothing less than transparency and the opportunity to voice concerns.	Well publicized and easily accessible information about opportunities for public participation - public meetings, comment periods, presentations, etc. - is essential to achieving well-conceived decisions and efficient project implementation.		
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inform on progress or lack of progress and why...what can be done and when		legal challenges help protect areas, there will be legal challenges and there should be...	use science (recent) to support the solution	find non-lethal solutions that benefit all parties a little...	allow all parties to participate	use science for good, and use science ongoing	try not to shove stuff through
		Keep it simple! The more "add-ons" there are, the more loopholes somebody will find to complicate a plan they do not like.				Get the EPA's budget to a point where there are enough people to handle all the needs. THAT is one of MY priorities for this agency :)	
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The BLM should always look for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.	Collaboration should begin early, and allow everyone to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should reduce lawsuits.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.
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open forums were people can voice their concerns, objections, or approval		I don't think there is a solution to preventing litigation, there is always someone or group who is going to be unhappy with the process or outcome • Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Use legal advise wisely • Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	form an opinion based of the exact data/information required • Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	use a team approach to analyze and present information, and keep data collection to the case/project in question • Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.
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		Stop doing the stupid stuff that creates the legal challenges! Stop fulfilling the wishes of lobbyists and money pushing special interest groups and instead fulfill the wishes of the citizens of the United States.		Stop being a typical government agency with bloat and special interests dictating everything. Our government appears to think that we citizens are stupid. We are not stupid. We are just fed up with the same stuff/different day.	
		Do the morally and ethically right thing. Document what you did and why. In the large health care system where I way employed (28,000 employees). When we were faced with a difficult situation we did NOT go to our attorneys for guidance. We first determined the moral and ethical thing, by the ethics of the healing professions and the values of our institution, that we should do. Then we documented thoroughly. Sometimes (but not always) we would consult our attorneys and ask them, "What is the prudent way to do this thing THAT WE ARE GOING TO DO?" We never went to attorneys first for guidance. (continued below)	(continued from above) You never go to attorneys Ist for guidance on how to treat the public, the tribes, or fulfill what has been entrusted to you. The law can tell you NOT to steal and not to go out of your way to harm. The law cannot hold you accountable to benefit the public, to bring joy to the tribes. This is the realm of morals and ethics -- "Do unto others....." Never let the Law be your guide when making important decisions.		
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		Do your best at helping the endangered animals and plants that may be impacted by one of your decisions by talking to the experts in those areas of expertise on how to complete your job with the least amount of damage.	Maybe going in another direction would solve the problem. It might be more expensive but less litigation and less delays (may save money).	Always go with the experts in the field (Universities and good environmental organizations that are not radical) and not on a company that picks their own experts.	Sometimes listening to the ranchers or owners of the land that are impacted can give very good information on how to proceed.
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Make it easier for states to share data, especially wildlife management data.	Encourage tribes to take part, and reach people off the grid.	Don't try to balance irresponsible development with conservation, and keep the public informed.	Remember that the lands belong to the public, not the next loud rich guy who threatens you.	Base plans on the latest science and public opinion. If they think you need an EIS, get one.	

Work more at education of public on just what you do and the laws that govern what you do. The how and why!

Follow federal law!

Including a more diverse group of stakeholders.

This is a tough one. It has been my experience that often things that seem small end up big. Get information from as diverse sources of possible impacts.

Don't coverup impacts. Take in lots of data at the start not later. You can always simplify and shorten later.

speak to your enemies

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Encourage tribal governments to participate, and find a way to communicate with remote regions which have little access to electronic media.

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Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

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- Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
Make it easy for states to share data, especially wildlife management data such as migration corridors, habitat, and scientific info important to hunters, fishers, and other backcountry enthusiasts.	Encourage tribal governments to participate. Make special efforts to reach areas that lack access to electronic communications.	More time spent at the beginning getting greater collaboration and sharing of ideas.	Stick to science-based decisions, consider ecological as well as economic values, balance responsible development with conservation, keep public well-informed, and provide adequate opportunities for participation	Avoid shortcuts that make a plan vulnerable to legal challenges	Base plans on the latest info, science, policy, public opinion, and an environmental impact statement if indicated.
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The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts. All imperiled wildlife. plant and insect areas must be taken into account and reserved.	Tribal governments should be encouraged to participate, and the BLM must make special efforts to reach areas that lack access to electronic communications. This may mean that this information is printed out and posted in local stores within the tribal areas. Even better would be to have meetings in these areas so that questions may be asked and answered, even if it would require meetings whenever the process is changed or progresses. It is imperative that Tribal governments be included if any of their lands are at all to be included. Also all sacred lands MUST be off limits for any change.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process. All concerns from any group must be fully addressed at all times.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits. Politics and corporation interests should NEVER play any part in any decision.	Do not allow so many shortcuts that a plan is vulnerable to legal challenge later in the process. The BLM must always realize the probable need for totally on-hands meetings in tribal areas.	Base plans on the latest information, science, policy, and public opinion. If an environmental impact statement is needed due to the science and/or public opinion pointing for it, do not skip that step.
Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers, miners, environmental organizations, energy developers, recreation groups, other federal, state and local agencies, and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.	The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Greater collaboration and sharing of ideas as well as a willingness to build on common ground, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible, sustainable development with science-based conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement (EIS), do not skip that step.	Let BLM managers broaden planning to the district or multi-field office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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Collaboration and creating opportunities for collaboration

make planning as broad and comprehensive as possible

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

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Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

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Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Share ideas, follow the science, do not neglect the environment.
I'm not a lawyer.

Different decisions for different districts

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.
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		Do research ahead of time and make sure that you have the very best lawyers on your team. Wealthy people can afford lots of litigation and lawyers, but poor people cannot. Therefore you need to defend through your legal team those who cannot defend themselves, not least of which the flora and fauna that you are designated to protect.		Have teams of scientists, advocates and local people ready to move to analyze environmental issues. Keep you research up-to-date so that you apply just the right amount of analysis. How? Examine the issue, the stakeholders, and the area and then adjust accordingly.	
Improve public Access to BLM land		Be proactive by sending out information to interested parties and the media and setting up a mediator before it goes to litigation.		Proactively seek comments prior to beginning the analysis	Consider generally accepted principals from the forest service and other state and national land entities.
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		Any lawyer(s)/lobby representing profit making groups should NOT be recognized		Corporations are not citizens....they should NOT BE RECOGNIZED in the use process.	
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NEPA is the law and cannot be undermined for private profit. NEPA upholds the public trust and scientific integrity. Do it right and the legal challenges will fade.

NEPA requires a consistent and thorough analysis of all projects.

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Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—all public citizens, local and area concerned citizens, recreation groups; other federal, state and local agencies; and all members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

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Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges. All citizen voices must be involved and heard and used in decision making.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Maintain and support the updated manual (MS-1780, 2016) and handbook (H-1780-1) on engaging tribal governments.

Where local governments do not have expertise in planning or NEPA, provide more robust support and liaisons to assist in engagement.

Ensure that processes are open and transparent and that public participation opportunities are provided and input is addressed to reduce conflicts that often lead to legal challenges.

Cutting corners on key aspects of NEPA such as relying on quality data, considering a reasonable range of alternatives and responding to substantive comments are the biggest risks for drawing legal challenges and delays from those challenges being successful.

Rely on accurate, up-to-date science.

The purpose of NEPA Is to ensure that agency decisions are informed as to the environmental consequences of decisions and made with the benefit of public input. These should remain the guiding principles for NEPA processes.

BLM should maintain sufficient resources to conduct compliant NEPA analysis.

The use of Determinations of NEPA Adequacy (DNA) should be discouraged. Where a categorical exclusion is not appropriate, a focused environmental assessment that shows the BLM is evaluating potential impacts is more consistent with NEPA.

The use of categorical exclusions should include thorough consideration of extraordinary circumstances that indicate NEPA analysis is required. Using categorical exclusions to permit drilling should be subject to heightened scrutiny given the potential for impacts.

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Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

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Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

By being transparent, and by listening to and documenting suggestions for compromise solutions -- or even redesigning the proposal -- BEFORE someone is upset enough to sue.

Any changes to the legal requirements for environmental analysis should have the goal to make the analysis documents more readily understandable. That might allow you to fairly avoid repeating boilerplate language and required responses in section after section. The reason for onerous length and detail in docs is to make sure everything has been disclosed so people will understand the effects of a project. There are better ways to foster that understanding.

At the beginning of each section of a document, explain why this section has been included. For example, EXPLAIN, in plain English, what 'significance of impact' means, and what the criteria are. Don't sprinkle surprise facts -- which might be offputting about a project -- throughout a document as though you are hiding them. Make documents searchable. Use easily understandable graphics, and not just tables. Use aerial photos, with orienting landmarks labeled, as the bases for maps.

Spell out fine schedules for extraction violations. Make any extractors enter into legally binding contracts. Just like if a private citizen breaks any other law.

Use funds to regulate extractors with personnel on the ground who can preform inspections and force the extractor to install monitoring equipment that has a log. Use technology. These are multi-million dollar wells, they can afford some remote monitoring equipment.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

Adhering to science-based decisions (not "alternative 'facts'"), considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

Writing legislation in such a manner that precludes judicial challenge is truly heinous, is the mark of small-minded people who are afraid and cannot really justify what they are doing, and should never be resorted to in a true and honest society.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

NO matter what you do, they are going to sue.

Stop allowing them to sue on language. make them pay for for analysis to establish scientific facts to prove their argument. until they do keep the decision in tack. right now you close until the facts come out and then ends up taking forever. look at the milkweed in the Imperial Dunes. Science proved the facts and it took years to re-open.

Do more CE NEPA

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Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

		If the BLM adequately addresses citizen concerns, the risk for litigation would go down drastically.	Demonstrate to the public that the agency truly does its due diligence. Be more responsive to legitimate citizen concerns.			Make certain that any action really does review all potential alternatives, placing citizen concerns(i.e. those citizens that actually live and work within areas affected by any given action)at the top of the list of priorities, rather than as an begrudged afterthought.	Do not streamline the process too much
		Do what makes the community happy.					
Actively invite---and ease the process for---states and conservation organizations to share wildlife management data with BLM, and vice versa. Important areas include wildlife migration corridors, habitat data, and population status of keystone species.	Tribal nations need special attention, since electronic communication may be limited in remote areas.	Base all analyses SOLELY on current, peer-reviewed science.	Make habitat conservation, not commercial interests, the clear priority.	Aggressively inform the public at all stages.	Genuinely invite participation and collaboration by the public and conservation organizations, and genuinely prioritize that input.	Be deliberative rather than hasty.	Base the analysis on current, peer-reviewed science.
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		hire people who know the law. it would be nice to have courts available at any time but it is not realistic. hire judges,appoint judges,lawyers to litigate				you have to know your area which means "hands on"analysis.	
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Tribal governments MUST participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

Adhering to SCIENCE-based decisions,--NOT CORPORATE GREED-- considering ecological as well as economic values, truly BALANCING responsible development with CRITICAL conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and PUBLIC OPINION AND INPUT. If the science and/or public opinion point to the need for an environmental impact statement, DO NOT SKIP THIS STEP

- Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

- Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

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- Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

BLM owes the mandatory duties in Section 202(c)(9) of FLPMA to state, local and tribal governments. The state, local and tribal governments need BLM to establish a clear process for how those units of government can learn of and exercise their rights under Section 202(c)(9).

BLM owes the mandatory duties in Section 202(c)(9) of FLPMA to state, local and tribal governments, but not to other non-governmental stakeholders. This distinction should be clarified in BLM policy and guidance.

- The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

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Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Follow the science.

Improve inclusion.

Do your homework!

Ensure that all legally required policies, procedures and regulations were followed at each step in the planning and review process.

Listen to all stakeholders and give careful consideration to all substantive comments.

Give primacy to the intent of enabling legislation of specific monuments or NCAs, where applicable, in considering the priorities among alternative management strategies.

BLM should consider the number, scope and severity of potential impacts to water and air quality, to landscape integrity and resilience, and to wildlife habitat and breeding success to determine the appropriate level of NEPA analysis.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

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Involvement in scoping by groups who are prone to litigate.

Use unbiased scientific data to assess the impacts of the project.

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		Case law has upheld the intent of Federal Land Policy and Management Act of 1976 (FLPMA) as allowing for more than one use on individual acres, and BLM should reaffirm this principle in policy and management handbooks. FLPMA established the statutory guidelines for BLM's management of federal lands. Under this Act, Congress specified that the lands are to be managed "on the basis of multiple use and sustained yield..." The law further states that BLM lands are to be "managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands..."	Similarly, the Mining and Minerals Policy Act of 1970 (MMPA) encourages development of domestic natural resources.The Act states that "it is the continuing policy of the Federal Government in the national interest to foster and encourage private enterprise in...the orderly and economic development of domestic mineral resources, reserves, and reclamation of metals and minerals," and it is therefore "the responsibility of the Secretary of the Interior to carry out this policy when exercising his authority under such programs as may be authorized by law other than this Act."	We support legislation to establish a procedure for resolving claims to certain rights-of-way on public lands. S. 468 was introduced in February 2017 and assigned to the Senate Committee on Energy and Natural Resources. The purpose of this Act is to achieve judicial and administrative efficiency for and to reduce the costs typically associated with, resolving right-of-way claims under R.S. 2477. Most rural local governments lack the resources to file a quiet title suit in federal court; the current policy is based on case law. Prior to litigation, local governments could work collaboratively with local BLM offices to present historical data to keep roads open without a federal court order.	Local BLM offices should have the ability and the authority to make decisions on historical rights-of-ways. If there is a dispute between the local government and the local BLM office, the matter could be elevated to the state BLM director. If there are no agreements, the national BLM Director shall have the final authority to adjudicate the matter.	See responses to A. above.	
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Consider how best to support state and local priorities across jurisdictions, such as managing wildlife migration corridors, backcountry recreation, cultural and historic resources and wildlands.		By ensuring that processes are open and transparent and that public participation opportunities are provided and input is addressed to reduce conflicts that often lead to legal challenges.	By using accurate, up-to-date science.			The purpose of NEPA Is to ensure that agency decisions are informed as to the environmental consequences of decisions and made with the benefit of public input. These should remain the guiding principles for NEPA processes.	BLM can define the right amount of analysis to match the scope of decision-making, without setting specific limits on pages or range of analyses. This scope and scale may be defined geographically as more than one field office, more than one state, or a smaller portion of a field office. This scale may also be defined by the breadth of issues to be addressed. Programmatic NEPA and the flexibility for defining planning areas in FLPMA and BLM guidance support this approach.

Research relevant tribal treaties and cultural/religious significance of lands involved. Desecration of burial grounds or other sacred sites should automatically cause serious delay, if not automatic rejection of any proposed project, regardless of economic potential. We would not tear down the Lincoln Memorial to get a finite amount of copper or gold, or turn Arlington Cemetery into an industrial park. The same standards of respect should apply to other holy places.		Make sure all parties are included from the beginning, with their ideas fully represented and voices heard, with appropriate documentation of that participation.	Make sure the scientific data are irreproachable, up-to-date, and not based on ridiculous ideas of pseudo-science, such as the current administration has been perpetuating, such as climate-change denial.	Consider the biological as well as geological scope of potential effects: is it potentially harmful to huge areas because of the freshwater aquifers involved? Which areas might have limited regional impact because of drainage patterns or lack of precipitation?	Be prepared to address domino effects, whereby one change sets off adverse results nearby, with a chain of negative impacts in an area larger than originally considered within the scope of a project.
		I'm not a lawyer - no suggestions here.		Clear definitions of Categorical Exclusions - National Park Service has good examples.	Use EAs for most projects.
Tribal governments should be consulted, and the BLM should make special efforts to reach areas that lack access to electronic communications.		Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	
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				Develop regional data bases of information from trusted sources and then allow those secondary sources to be used in future analysis. Once an air quality report is done for a region for example there is no need for the same study to be completed 1 year later unless conditions have changed dramtically.	Realize a one size solution doesn't fit all. Develop streamlined NEPA for low impact projects and allow local planning documents to suffice when reasonable. Flexibility is the key.

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Provide generous public hearing opportunities and act in the public interest.		Allow for collaboration among stakeholders to make documents that address concerns of stakeholders.	Share progress on the progress of the planning with stakeholders, including public to find out problem areas.	Base plans upon scientifically defensible tenets.	Balance ecological and economic concerns.	Adhere to the legal process without shortcuts.	Plans should be scientifically based.
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Include all groups from the beginning when an action is proposed to get everyone's input. Not everyone will get what they want, but everyone should have a voice.	Native Americans have too often been excluded from decisions that impact tribal lands. Unfortunately, many of these people still do not have the access to electronic equipment that the rest of us take for granted. These people must be included in the process so they have a say in decisions that affect their tribal lands and heritage.	Hold meetings before the process starts to hear legitimate objections that could be headed off early.	Work across boundaries so different agencies and demographics impacted know what is happening before it starts.I live near the Des Plaines River. All the towns along the river were taking their own steps to mitigate flood impact. Finally they started working together and have set up flood controls including watersheds, flood walls, raising road beds, etc., that are finally having a positive effect along the river. The solution took years of planning. it took time to purchase property, get permits, etc., funding. before the plan could be put into action.	Do not take shortcuts. if an environmental impact study is indicated, do it first. In the long run it saves time and makes for a better relationship. All you have to do is look at the Dakota Access Pipeline debacle to see how important it is to do studies first.	Development and conservation both have to be taken into account. Economic impact has to be taken into account.	Work across boundaries so different agencies and demographics impacted know what is happening before it starts and are given a chance to work together for a better solution.I live near the Des Plaines River. All the towns along the river were taking their own steps to mitigate flood impact. Finally they started working together and have set up flood controls including watersheds, flood walls,removing dams, raising road beds, etc., that are finally having a positive effect along the river. The solution took years of planning. it took time to purchase property, get permits, etc., funding. before the plan could be put into action.	
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Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

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Have a detailed monitoring process for any project that you approve, let stake holders know how to make complaints and actually follow-up on the complaints.

First and foremost adhere to science based decisions. Do not ignore science as many in the current administration want to do.

Starting with the first scoping meeting, take participants concerns seriously and build them into the analysis. Do not try to minimize risks. Where they exist they need to be spelled out in detail. There need to be detailed, enforceable mitigations and all stake holders need to be assured that there will be monitoring to make sure that mitigations actually occur.

Do not ignore tribal treaty rights as has been done far too often in the past with disastrous results.

Do not try to cut corners. If a full EIS is needed, do one. Always err in the direction of caution and do an analysis that is detailed enough that it doesn't need to be challenged. Recognize that some proposed projects may be so dangerous that the best alternative is the no project alternative. When stakeholders lives, health, property or way of life is likely to be destroyed by a project they will sue and they have every right to do so.

Do not try to take short cuts. Do your analysis at the level that it needs to be done. If a full EIS is needed, do one.

Do not ignore stakeholder concerns. Begin with as broad a scoping meeting or meetings as possible.

Have greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process

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Take into account ALL aspects of what you are trying to do affects EVERYONE AND EVERY LIVING CREATURE AND NATURE.

Take the time to study all of the impacts of what you want to do, make sure everyone is aware of what you want to do and can voice concerns

		Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.		Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.	
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		Have clearly written laws and agreements that reduce the loopholes for individuals wanting to work with the BLM. Lawsuits are always going to happen, but taking away ambiguity in rules and regulations makes the job simpler.			
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FLPMA Section 202(c)(9) states, "…the Secretary shall…coordinate the land use inventory, planning, and management activities…with the land use planning and management programs…considering the policies of approved State and tribal land resource management programs." It is clear Congress intended that BLM consider not only the plans of state, local, and tribal governments but also their programs and policies. Proposed regulations should be consistent with FLPMA	Non-local public are typically unfamiliar with local resource conditions and the values of the non-local public may not be consistent with balanced land management. In seeking to better understand public values, the BLM should prioritize the public values of local people who live near a planning area, and depend on the multiple use and sustained yield of the area's natural resources. Nothing should elevate the status or influence of non-governmental organizations or the general public above that of an elected official or cooperating agency.	Consistently and correctly uphold the laws, policies, guidance, etc. applicable to each project or planning type.	Provide the public, cooperating agencies, and State/local governments meaningful and appropriate involvement in all planning processes.	Ensure a full administrative record is kept for all decisions with input that was received.	Avoid unnecessary verbosity. Analyze alternatives that are reasonable and address the issue at hand to avoid unnecessary time and costs.	Review and possibly remove recently promulgated Internal Memorandums (IM) that increase the time and complexity of certain NEPA processes. (i.e. IM 2017-36 Considering Backcountry Conservation Management in Land Use Planning Efforts and PIM 2017-003 The Council on Environmental Quality Guidance on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews)
Coordination should be happening outside of the NEPA and planning process.	Dedicate staff to develop and provide technical assistance to enhance communications across local, tribal, state and federal partners.					
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BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other landowners, including state agencies, tribes, other federal agencies and private landowners	Tribal governments should be encouraged to participate, and BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well informed, providing adequate opportunities for participation should also reduce law suits.	Consistent with the Federal Lands Policy and Management Act Section 202(c)(3), give priority to the identification and protection of areas of critical environmental concern.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy and public opinion. If the science and or public opinion point to the need for an EIS, do not skip that step.
		Consider whether the pre-decisional and appeal process used by the USFS is more efficient than BLM's process.				
		Collaboration will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Balancing responsible development with reasonable conservation and providing adequate opportunities for participation should also reduce lawsuits.		Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	
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		Keep true to the agencies mission statement and respect all opinions.	Be transparent with public comment, scientific reports from pier reviewed sources, stakeholder meetings and keep politics out of it.	It is not the BLM's place to change environmental law or work to shortcut results.	
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Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

As an attorney, I feel that greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

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Unfortunately, BLM has tried to "skimp" in the past and has ended up being sued. Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step. Also, don't try to claim there are not cumulative impacts when there obviously are.

The BLM needs to work more with the public to resolve concerns that arise regarding various projects. The public often seems to feel as though their comments are disregarded, which often results in litigation later on. When people see that substantive changes occur to a proposed project as a result of public comment, then litigation is less likely.

Here in Nevada the changes to the Bald Mountain mine expansion plan as a result of public comment is a good example. The alternatives developed as a result of concerns raised by the public around how mule deer would be affected by the mine expansion sufficiently addressed these concerns so that

By law the EIS is intended to take a "hard look" at the impacts of a project, thus the extent of the analysis should roughly scale with the extent of the project. Predetermined scaling of the analysis seems contrary to the "hard look" mandate of NEPA. Rather the agency should be prepared to expand the analysis and possibly collect any additional data as necessary to fulfill that mandate. BLM should not be closed off to expanding an EIS if a new impact of the project arises through the NEPA process

Greater collaboration of ideas, and adhering to science based decisions. Keep the public well informed throughout the planning process.

Base plans on the latest scientific information, and public opinion.

Do not streamline or 'push through' permits for extractive uses. They must go through a legitimate process or they will always be challenged in courts.

Require new NEPA process for projects that are 're-starting' after a period of inactive years. Relying on old and outdated NEPA will result in legal challenges.

Do not encroach on tribal lands, designated or known to be valued. Even if BLM technically has the right, this will always result in protracted and bitter legal action, and bad PR.

If a 'new use' is only new in that it is commercial, but the same use is established by private users in the area, scale down the NEPA.

If a use has been shown historically to have unanticipated consequences (i.e. drinking water pollution on Navajo Reservation from uranium extraction) expand the NEPA to account for long term, unanticipated consequences and institute periodic reviews.

Strong reliance on science and environmental protection.

Look at the total scope of the action being considered and include it in public news releases.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

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The BLM should make it easier for states and regions to share data—particularly wildlife management data—with the agency and vice versa. Action should come from a broad-based decision-making process, not silo management.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Consistency in planning the application of decisions will limit the chances of special-interest trolls manipulating the system to their own ends and at taxpayer cost.	Annual review of what generates opposition so that better care is taken in the initial stages will not only reduce problems but also, if they feel they are really being heard, give satisfaction to more people	Do not prioritize short-term profit/savings for ANY entity over long-term goals or doing what is right.	Do not encourage shortcuts that will make plans vulnerable to legal challenges later in the process.
•BLM needs to acknowledge that working with so many stakeholders takes time and that it will allow a reasonable amount of time for the process.	•Incorporate ACHP's Recommendations for Improving Tribal-Federal Consultation (Sept. 14, 2015) into BLM's NEPA planning. Implement the recommendations in the ACHP's report Improving Tribal Consultation In Infrastructure Projects (May 24, 2017) and in the DOI, DOJ, and ACOE report called Improving Tribal Consultation and Tribal Involvement in Federal Infrastructure Decisions (Jan. 18, 2017) to improve overall compliance with federal requirements and tribal consultation.	•BLM can reduce litigation by covering all the bases, crossing all t's, etc. The agency should be able to defend all its decisions, and should not make final decisions until BLM has all the relevant information. Create a checklist so you complete Issues A-D above prior to making decisions.	•Better decisions come from better coordination. There are many advantages to doing both NEPA and Section 106 processes early in the planning process. Examples from BLM include the Solar Energy EIS and Programmatic Agreement (PA), the West Mojave Travel EIS and PA, and the Desert Renewable Energy Conservation Plan EIS and PA.			•Better coordination with other compliance processes would increase efficiency and reduce duplication of efforts.	•Consider expanding the list of categorical exclusions to include actions that usually don't have any impact on cultural resources or effects to historic properties. This expanded list must be compiled in consultation with SHPOs, Indian tribes, and other stakeholders.
		Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.				Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	
		Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.				Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.	
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.	The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.		Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	
Giving everyone the same goal allows all stakeholders to focus on achieving a solution together, as a group, which builds trust and respect.		Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			Don't allow shortcuts - ever. Do the full scale assessments for all projects and management assessments to ensure fact-based planning.	Be completely transparent in all analytical efforts so there are no surprises.
Make it easy for stakeholders, especially states, to be able to share data and experiences, including relating to wildlife migration and the importance of migration corridors on public and private lands.	Special and early outreach (in the appropriate venues) to Tribal governments is important (e-mail and the Internet are not always going to be the best sources of outreach or information).	It's all about collaboration and sharing ideas and information. Time-consuming, but necessary for achieving the best results.	Need to be science-based decisions, based upon local conditions and balancing development with conservation.	Keep the public well-informed with adequate opportunities for participation in the process every step of the way.	Make sure the process and the resulting plans are solid and will withstand possible legal challenges.	Balance public participation and input with latest "on-site" information, science, and best policy practices.
		consult everyone prior to filing anything			I don't know	
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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		By doing the right thing for the land we live in and the flora and fauna the exist on it.			By actually considering the analysis, rather than blindly doing what only a few bad apples at the top want to do to our mother earth.	
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.		Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. All of this information should be made immediately available to the public at large. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Transparency of intentions for BLM planning, greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Avoid encouraging so many shortcuts that a plan is vulnerable to legal challenge later in the process. Doing it right up front saves so much time in the end.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step. Include the triple bottom line analysis for every decision, economic, social and environmental. Ensure there are dedicated staff responsible for safeguards in every planning process.

		• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process. • Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits		• Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process. • Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step. • Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.	

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		Adhere to science-based decisions, consider ecological as well as economic values, adhere to responsible low impact development, provide many opportunities for stakeholder participation.	Collaboration and sharing of ideas at the front-end should result in fewer challenges and delays at the end of the planning process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	BLM managers should broaden planning as needed to better address cross-boundary issues.

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

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Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

Make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

While more time-consuming in the beginning, greater collaboration and sharing of ideas, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Allow BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

It is also critically important to encourage Tribal Government input and to ensure an outreach process is in place for areas where electronic communication is limited or nonexistant.

Greater collaboration with all parties during the entire process.

Adhering to science-based decisions that not only consider ecological as well as economic values and balancing responsible development with reasonable conservation.

Keep the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Avoid including shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. Where the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Share data

Stick to the science and you have irrefutable reasons. Opinions can be contested, not facts.

People don't like to be blind sided. If they have more information and made their voices heard along the way, there is less likely to be a lawsuit that unravels your plans at the end.

Stick to the science

Heed public opinion

More time should be spent in preliminary outreach to those who might be
effected by a project of change. There would be less recrimination and protests
would be heard outside a courtroom.

Recognize those factors that will be effected and those that will not and focus on those related to the actions desired.

Adaptive management decisions based on available science and the results of increased documentation and monitoring will reduce legal challenges.

Analyses must be based on scientific interpretation of information acquired from previous documentation and monitoring. Scaling up acquisition of this information will require increased initial effort but will pay off with reduce future efforts.

Engage a variety of people whose backgrounds complement BLM personnel

Collaboration from the outset

Include current research and science in planning

Don't come to meetings with the answers already settled on. Collaboration!!

Keep projects simple, well researched, and inclusive of contemporary science and other factors that are part of the development of the plan

Do due diligence regarding the plan especially related to those affected

The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

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Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Don't do illegal things or try end-run short cuts to avoid appropriate environmental assessment.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

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The BLM should make it easier for states to share data such as the wildlife management data with the right agency and vice versa. This could include the identification of wildlife migration corridors and other habitat data. They could also share other information that is important to hunters, anglers, and other back country recreation enthusiasts.	The Tribal governments should be encouraged to reach every possible area to participate, and the BLM should make special efforts to reach everyone in those areas that lack access to computers or cell phones to keep up by electronic communications.	BLM should be sure to share any of their ideas with everyone concerned, while it may be more time-consuming to start with, it will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to the science-based decisions, considering ecological, economic values and balancing responsible development with conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Don't encourage so many shortcuts as this makes the plan more open to legal challenge later in the process.	BLM should base their plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step as it is very important for everyone involed.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.				

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Tribal lands are NOT public lands.

Base your analysis on current science.

Put environmental interests first.

Make use of research that has already been done on similar projects in similar locations as a starting or reference point.

be open

don't pollute and kill

don't use chemicals

don't use plastic

Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

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Early on suggest that each environmental organization have their lawyer review and comment on legal aspects and then review and reply, maybe negotiate

Early on, include relevant legal feedback from other federal and state organizations in all correspondence.

Ask employees to review and comment on actions being considered.

Include, without penalties, employees who may not agee with all actions.

Pretty simple: honor tribal treaties and sovereignty.

Damned if I know. People and groups that are unhappy will sue.
Retain better lawyers.

No shortcuts. Use science. Listen to the public.
Really listen.
No help here.

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Being more inclusive in planning process will yield more acceptable outcomes, fewer disgruntled stakeholders, and fewer legal challenges.

Collaborative solutions that are built upon a strong scientific framework will be more defensible in court.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Do it right the first time. Do not shortcut NEPA analysis and utilize strong science, as this will yield a result that will be vulnerable to challenge and result in repeated NEPA analysis and associated costs.

Allow BLM offices to work together across district boundaries to reduce duplication of effort.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science points to the need for an environmental impact statement, do not skip that step.

Know the law! Work for cooperation from all concerned. Avoid perception of favoritism.

Do your homework. Bring in efficiency personnel. Bring in locals familiar with details involved.

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Base decisions on objective science

Bring all stakeholders to the table prior to taking any action

Strive to better address cross-boundary issues and simplify the number and complexity of resource management plans

- Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.
- Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
- Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Do the Proper Environmental Impact & Land Use studies thoroughly AND correctly from the get go, allowing for public input on any proposals being processed.

By honestly & ethically approaching it from the POV "What is BEST for the taxpayers (think shareholders or trustees here) who own this land?"

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Invest in non-linear systems analysis projects w/ local universities.

Increased public input and transparency up front. By engaging the public early and often, the BLM will have a more user friendly planning process that better integrates the needs of stakeholders.

Making data, planning criteria, and resource information publicly available and easy to access from the start will lead to greater transparency, increased trust and better public engagement.

I don't think this is possible in our litigious society. Who ever doesn't get what they want will attempt to achieve it in the courts. Possibly a loser pays fees legislation would help.

Always remember who owns the land and what is in their best interest "Right Size" implies that something (profit for example) could justify reducing the import of environmental concerns. I repeat, the land is owned by ALL citizens.

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Greater collaboration and sharing of ideas in the beginning will result in fewer challenges, delays and lawsuits in the long run.

Adhering to science-based decisions, and considering ecological as well as economic values should reduce lawsuits.

Truly balancing responsible development with reasonable conservation should reduce lawsuits.

Keeping the public well-informed and allowing participation should also reduce lawsuits.

Do not encourage shortcuts which make a plan vulnerable to legal challenge later in the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip it. Complete an environmental impact statement.

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The BLM should always be looking for opportunities to share ideas and collaborate across its own field office boundaries and with other public landowners, such as state agencies, tribes, and other federal agencies, as well as private landowners.

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BLM's credibility with its neighbors is harmed when planning and NEPA deadlines are routinely missed. For example, BLM's Washington DC office (WO) is slow and unpredictable in how it processes required Federal Register notices relating to important planning and EIS efforts. Local BLM project leads are often in the dark about how to navigate this WO maze. Top BLM management should ensure that Federal Register notices are handled by the WO in a timely, clearly traceable, and effective manner.

BLM should stop attempting to downplay, deflect, minimize, or ignore strong public concerns during planning and NEPA processes. BLM managers tend to want to avoid controversy at all costs, always put BLM in the most positive light, and conceal embarrassing or conflicting information. These tendencies often backfire and contribute to the frequently successful litigation against BLM. This is especially true with grazing related NEPA analyses.

BLM should not make NEPA promises or create performance expectations relating to monitoring and mitigation that it likely cannot keep. For example, BLM may say in a grazing allotment permit renewal EA that it will monitor utilization each year and identified key areas every three years to ensure that permit conditions would be met and that the standards for rangeland health would be followed. In stark contrast, the actual records may show that, in the preceding ten-year period for that allotment, these one and three year promises were often not met due to range staff vacancies, excessive workload, or other reasons. BLM should be honest about its workload limitations.

BLM should more proactively encourage collaboration among different stakeholders and interest groups, including sportsmen and environmental groups. The prospects for compromise and reduced conflicts increase when there are face-to-face meetings and people with different backgrounds and viewpoints have an opportunity to build positive relationships. Sometimes collaboration works and sometimes it does not in solving controversies. Despite this uncertainty, BLM should nevertheless encourage collaborative efforts wherever possible. Nothing ventured, nothing gained.

I believe that this category largely overlaps "A. Focused Analysis" above, and so my previous suggestions in this category stand, including with respect to adding more CXs and using more programmatic EAs with tiered supplemental EAs and DNAs.

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Using good science instead of resource to be had

Good science in Environmental Impact Study

Do it right the first time. Take your time and cut no corners from the beginning. It takes longer but insures better results.

Including all concerns in final outcome

There might not be a streamline action where sensitive areas are concerned

Protecting our natural lands is your primary occupation.

If social media and 'normal' forms of media are not accessible to certain parties, other means of communication must be found, e.g. one-on-one meetings and the postal system ('snail mail').

No one should be excluded from the process due to political affiliation, religion or sexual orientation.

The BLM must do its homework process to starting any project (i.e. the planning phase) to avoid missing key stakeholders.

Keeping people well informed from the start should avoid any surprises along the way.

Avoid speaking down to people to allow them to better understand the information and data being presented. Avoid jargon. And keep the discussions as science-based, evidence-based as possible.

Never assume that there is only one solution or answer to a project. Keep open minded.

Avoid over-simplification and too short an analysis of a project otherwise the review will be pointless and cause unnecessary delays as people ask and require further information and data.

1. Coordinate, collaborate and integrate across sectors, departments, and divisions to better understand and streamline the process.

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Respect the fact that most Americans want conservation and renewable land-use applied to public land management.

Respect existing protections, and avoid allowing commercial and industrial activity from damaging wilderness and recreational areas, and other lands already assessed as being of unique or critical value.

Cease political attempts to exclude conservation-minded people and interests from the courts.

Make legal decisions and create rules and processes that protect our valuable resources.

Commit to thorough planning processes.

If BLM stops unnecessary extractive activities there will be no need for legal representation.

If BLM stops extraction there will be no need for NEPA analysis.

Consider the performance standard history of the company. Companies with high proven standards should undergo a less vigorous NEPA review.

Each of your specialists ares super busy with their single resource that they are responsible for and at time it seems that these specialist will create more work than necessary in order to justify the importance of their resource. an example of this is wildlife and archaeology that we have experienced.

The BLM has the flexibility allowed it in the law while still being able to meet the intent of the law. They need to exercise their flexibility at times such as minor changes to a plan of operation - we are having to do a complete NEPA review on a 3.8 acre modification sandwiched between two approved mines.

Yes the BLM is required to complete the NEPA review, however do not have to include the unnecessary items. We have experienced the specialist analyzing species that do not live in the habitat that we were proposing.

Consider different resources and plans based on individual characteristics and input from proponents.

Tier the NEPA review to past EA's since most past plans are very similar to current Plans of Operation.

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Support the sharing with states of wildlife migration and other data for all stakeholders.	Important: Take care to communicate with tribal governments, especially those areas without internet communications capabilities.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process. Keeping plan development well aligned with scientific data, showing all entities involved or concerned with the project that ecological and conservation values are placed before economics, and ensuring that no affiliated business, corporation, private party, or foreign interest stands to profit from the ultimate planning outcome.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process. Time is NOT of the essence here. ALL information submitted needs to be seriously studied, regardless of the source of submittal. The environmental impact MUST be first priority, particularly if it involves destruction of land, contamination of water or air quality, displacement and loss of flora and fauna. Once gone, these are gone forever...irreplaceable.. altering and playing a large part in the possible loss all life upon earth.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
Building collaboration takes time - so give it plenty of time and reach out to unlikely voices as well as state, county and tribal governments. Publish when RAC's are meeting to get turnout	Create easy ways to share data especially about wildlife Inform (publish) the public (Social media, newspapers, etc.,) as to whom the representatives are on each RAC, so that constituents can reach them	If you invest in creating equal collaborations which requires an initial input of time, you will have less litigation. Strong, trusting relationships will pay you in volumes. This may never happen--but open processes can lead to fewer lawsuits, so eliminating RAC's won't help this. Try to minimize negative effects on "victims"	Adhere to science-based decisions More publicity as to what, where and why decisions are made. Value scientific input	Balance responsible development with reasonable conservation	consider ecological as well as economic values	Refrain from shortcuts that can leave plans open to future litigation The greater the risk to the environment or the area that's affected needs more scrutiny. Foresee potential problems	Base your plans on up-to-date scientific evidence balanced with public opinion Weigh possible negative effects on people.
		A continuation of science based decisions that have been vetted by representatives from the various involved parties. The more collaboration the is and the more open, transparent sharing of decisions would garner more trust and acceptance of decisions.				Use the data that is found. Listen to your public and shareholders - needs of the people as well as regulations for various public entities and state or national government involved in the project.	
There must always be a balance in workshop attendees that represent the wide spectrum of interests and users of public lands, and an honest effort by BLM to clearly acknowledge conflicting philosophies, desires, etc., and to explain to all participants that BLM is guided by law and policy, not by which group has the most political clout or local support.	The BLM must always emphasize to local interests that public lands have stakeholders throughout the nation, and that no local or special interest has priority over those of the wider public.	The BLM needs more help and review from their DOI Solicitors, and there needs to be more Solicitors, or similar legal assistance, during the planning process. Typically RMP's and EIS's are only reviewed at the end of the process, and solicitor's comments often find major problems that can require major re-writes, analysis, or other delays. Solicitors are overwhelmed by the number of NEPA documents, and cannot keep up with the demand. Another level of legal review should be required throughout the process, and perhaps a new category of staff can be developed to help local offices and NEPA/Planning staff to avoid problems	While the BLM conducts NEPA training for most staff (though not enough, see previous comments), the emphasis is usually on EA level documents. There is very little training for developing EIS and RMP level documents. Though local staff may participate in developing specific sections of NEPA documents, often there is no training or guidance on seeing the bigger picture of the entire document or process. This can result in conflicting actions and inconsistencies between resources and programs, leading to vulnerable documents.	The review process at state and WO levels must be consistent and streamlined. Very often a document is held up for too long because of lack of guidance and little emphasis on timing to reviewers. I have seen documents go through reviews at the state office, be cleared, and then go to the WO where the same issue that was OK at the SO is questioned by staff at the WO, sent back to the SO, and then reviewed by a different staffer (maybe because of a staff transfer, reassignment, etc.), and sent back to the field office, then repeated endlessly. There must be a better emphasis on timeliness at the review level so there is ample time for legal review.		Better resource management plans and allocations should prevent consideration of actions that would require extensive analysis not covered in the RMP EIS.	Thorough analysis of sensitive resources, such as T&E species, candidate species, cultural resources, etc., should not be streamlined, regardless of the scale of the action. Better development of the RMP and EIS should address these issues at the plan level. Further analysis would then be reduced or eliminated
Make it easier for states to share data – particularly wildlife management data – with BLM, and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important for hunters, anglers and other backcountry recreation. Consider how best to support state and local priorities that cross jurisdictions, such as managing wildlife migration corridors, backcountry recreation, cultural and historic resources and wildlands. Balancing other uses with energy development is vital for addressing the vitality of affected communities.	Maintain and support the updated manual (MS-1780, 2016) and handbook (H-1780-1) on engaging tribal governments and encourage tribal governments to participate, and make it easier for smaller tribes with few resources to participate. Make special efforts to reach areas that lack access to electronic communications.	Increase collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhere to up-to-date and accurate science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well informed, providing adequate opportunities for participation should also reduce lawsuits.	Ensure that processes are open and transparent and that public participation opportunities are provided and input is addressed to reduce conflicts that often lead to legal challenges.	Do not cut corners on key aspects of NEPA such as relying on quality data, considering a reasonable range of alternatives and responding to substantive comments, since this will likely result in legal challenges as well as delays from those challenges being successful.	Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process. Base plans on the latest information, science, policy and public opinion. If the science and or public opinion point to the need for an EIS, do not skip that step.	Maintain sufficient resources to conduct compliant NEPA analysis. Public comment and response to comments should be the rule not the exception for NEPA processes. This is more consistent with NEPA's goals and the importance of public input for decisions that affect public lands.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Collaboration should begin early, before scoping, and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should reduce lawsuits.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.			Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

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Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process. Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

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Where local governments do not have expertise in planning or NEPA, provide more robust support and liaisons to assist in engagement.

–Consider how best to support state and local priorities that cross jurisdictions, such as managing wildlife migration corridors, backcountry recreation, cultural and historic resources and wildlands.

Ensure that all of the mandates of FLPMA and NEPA are fully complied with and to actively build trust, credibility, and respect with public lands stakeholders

Ensure there are ongoing, meaningful opportunities for public input into the agency's decisions on the use and management of our public lands.

Include quality data, consider a reasonable range of alternatives, and respond to substantive comments.

this is a case by case basis depending on the project. BLM can define the right amount of analysis to match the scope of decision-making. This scope and scale may be defined geographically as more than one field office, more than one state, or a smaller portion of a field office. This scale may also be defined by the breadth of issues to be addressed.

Reserve Categorical Exclusions for extreme circumstances.

Propose actions that fall within environmental and safety law and policy.

Use clear and straightforward language.

Provide an opportunity for interdisciplinary team of agency professionals, those who would be impacted, and members of the public to give input about the level of analysis.

Get the issues and potential issues up front right away so they don't arise later.

Open dialogue/ communication can forestall surprised/ angry responses, with FAIR and EQUAL participation by citizens AND "special interests".

EXPECT THE NEED FOR AN ENVIRONMENTAL ASSESSMENT! If we can't live with [on] this planet, we will NOT live without it... Science must inform all decision-making.

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Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

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Get all who may be affected by a project involved from the beginning. That means not just industry and ranchers, local citizens, etc -- but also people from far away who may use the land for recreation. Their tourism dollars are good for the local economy.		If before making ANY decision, BLM pays close attention to 1) the concerns of local people whose lives will be directly affected, including safety of water supplies, soil, and air, 2) the well-being of area wildlife, 3) interests of tribal communities whose heritage may include sites on BLM lands, and 4) the interests and concerns of those people and entities that don't have a lot of money, and IF BLM truly treats those needs and interests as having equal value with the interests of industry and ranchers -- then maybe you can avoid legal challenges.	Don't rely just on industry to do comprehensive analyses of things like environmental impact.	Don't lie to people. Don't hide information.	Recognize that "the environment" isn't just some place where people hug trees. The environment is where we live: the air we breathe, the water we drink, the soil that supports our crops and gardens. By "we", I mean children, pregnant women, parents, non-parents, elders, all races, and people of every socio-economic status. Even "captains of industry" and political leaders. Those life-essentials need to be given priority for protection -- priority over profits. BLM properties should be "cleaner" and environmentally safer than developed communities because they do not belong to only the few.	Everything is connected. All water flows downstream. Air moves generally from west to east. Don't pretend that what is done on BLM land has no effect on communities and people "in the plume" and downstream of that land. No analysis that ignores the fact that any piece of BLM land is part of a much larger three-dimensional environment can ever be a "right-sized" analysis.	Do not imagine that business-based analysis of anything applies to the natural world. For example, frack-quakes won't stop just because industry representative are not directly affectedly them and ignore their effects.
		early collaboration	science-based decisions, not just economic ones			You must mandate an environmental impact analysis and statement	
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		Adhere to science-based decisions.	Early participation of stakeholders can help avert later feelings of policy imposition and coercion. By increasing participation on the front end, the effect will be to reduce the amount of litigation because those groups that are likely to sue have already been included in the process. This should also improve the planning process by reducing the need for costly and time-consuming supplements that can delay decision-making.	To reduce redundancies in environmental reviews and improve local participation, BLM should engage in long range planning at the landscape level, incorporating public input as early as feasible.	BLM should adopt a schedule to update Resource Management Plans (RMPs) on a rolling basis and to develop mechanisms for consistent monitoring and amendment of those RMPs. Regular analysis of management strategy and efficacy would make the RMP revision process less onerous, and would allow BLM to incorporate the best available science continuously into its planning process. That analysis would then not have to be repeated constantly at the project level
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Make science based decisions that support biodiversity

Collaboration and transparency in the planning process

Make decisions science based

Keep the public and other federal and state agencies involved throughout the process. Because in many cases BLM land abuts state and federal Parks, Planning should be regional and support wildlife. For example, science may tell us that a particular species travels x miles to find food every day , planning with adjacent public lands to assure that that population can have safe access to its territory.

While collaboration is more difficult and time consuming, it will result in a better outcome and more efficient use of agency resources

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Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

The requirements for NEPA reviews of major federal actions continue to be abused by opponents of multiple use activities on BLM lands. The following are options BLM should consider to reduce the possibility of legal challenges:

1. Established regulation, policy or agency requirements to have a set schedule for the NEPA process. This will facilitate timely environmental reviews and reduce costs to both the agency and industry. The BLM should establish a requirement to have EIS documents completed within 24 months after initiation of a review.

2. BLM should assign a project manager for any NEPA project with the appropriate skills to manage said project.

3. The process of mandating alternatives in the NEPA review creates delays and unnecessary evaluations which adds costs. The scope of alternatives and its utility to the NEPA process should be reconsidered.

4. Guidance on the scope of integration of greenhouse gases/climate change evaluations must be established

5. The BLM should also reduce mandatory actions to limit the abuse by advocacy organizations to redefine agency priorities through litigation.

The BLM should initiate rulemakings to narrow the scope of NEPA for certain actions. While NEPA defines the basic terms of an analysis, the details of those definitions are framed by regulatory interpretation. By limiting the scope of NEPA reviews, the BLM will limit the scope of litigation in the federal domain. The agency should also establish deadlines for interagency coordination regarding federal permitting.

Leasing protests should also be specific to individual parcels and should identify issues with that specific parcel. Currently, BLM spends countless hours responding to protests that only identify general issues. The agency should have the authority to disregard protests that do not identify why an individual parcel should not be leased.

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Greatly improve and speed up the WO handling of field Federal Register notice packages. There may be huge delays and uncertainty related to the labyrinth in the WO in getting something actually published in the Federal Register.

Many tribal governments are poor, under staffed, and have very limited travel budgets. If BLM is serious about genuine tribal involvement, either BLMers will need to make more trips to meet tribal representatives or BLM will need to reimburse tribal representatives for their actual travel expenses to BLM meetings.

The truth will set you free! BLM often loses litigation because it tries to low ball, downplay, or ignore important information that is relevant to a NEPA analysis. BLM also loses litigation because it makes arbitrary decisions to please powerful ranching, mining, or oil interests. BLM would win more lawsuits if it is honest, does not try to hide or obfuscate data, objectively evaluates feasible alternatives in good faith, and makes reasoned decisions that track with the analysis outcome. Judges do not substitute their judgment for BLM unless there is evidence of some impropriety. When BLM loses lawsuits it is usually because BLM was at fault.

BLM's dysfunctional management culture and excessive bureaucracy causes vastly more NEPA delays than those caused by litigation. Instead of looking at litigants, BLM should look in the mirror to find the cause of most NEPA delays. For example, many BLMers likely find it difficult to keep up with their NEPA work when they are faced with many other bureaucratic processes and deadlines. Death by a thousand cuts. Take required annual trainings, most of which are highly redundant from year to year. Instead, have initial tests on the content and if an employee passes they don't need to take the whole training..

Fire openly biased, unproductive, and/or incompetent managers and employees. High performers at BLM are rare and punished for their hard work and initiative. This is because they set the bar high for themselves, and they are then expected to keep to it. Meanwhile, slothful and incompetent BLMers receive little or no accountability. This is fundamentally unfair and why many high performing BLMers leave for better jobs and work environments.

Make more CXs available to reduce the need to do many EAs.

Laser focus NEPA analysis on the actual issues or resources that are present or may be affected. Put minimal focus on explaining what is not present or would not be affected.

Make documents fair and airtight.

Give the protection of the environment number one priority, and those wishing to protect the environment will be less apt to make legal challenges.

Do what is right, and you won't be sued.

If a real problem exists, challenges in the courts are the best way for that to be handled. Do not make this impossible.

Remember, sometimes tiny things are most important.

Consult with stakeholders

Input from conservation organizations

Local communities, economies, customs, and culture are most impacted by changes in federal land management. While impacts at the regional or national scale are important, they must not be the focus of an impacts analysis. Assessing impacts at the local level is necessary and appropriate and should be required.

Coordination and consistency with state, local, and tribal plans and policies are paramount to successful planning efforts and are required by FLPMA. Coordination should be a continual dialogue between BLM and engaged state, local, and tribal governments. BLM should take steps to encourage this dialogue with all governmental entities with interests germane to the development of federal land management plans.

Add more clarity to regulations. Failure to include a reasonable range of alternatives is a common source of litigation. What constitutes a 'reasonable range' is too subjective and needs more definition.

Administrative special designations created by policy have added complexity to the planning process that inflates analysis requirements. Policy borne designations such as Lands with Wilderness Characteristics and Backcountry Conservation Areas introduce additional layers of bureaucracy to federal lands and complicate the planning process. It is important to keep in mind that an ACEC is the only administrative special designation authorized by FLPMA

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The BLM should reach out to stakeholders in their regions annually with a review form that asks how are things going, what can be done better, and then follow-up and respond when comments come in.

We addressed this issue above when we requested that applicants are not locked entirely out of the NEPA process. The use of MOUs and rigid third-party contractor arrangements on EA projects results in weaker documents, poor communication, and analysis that is prone to legal challenges and delays.

The BLM needs to focus on what are the issues that are causing legal challenge in each region and ensure that those areas are covered in the NEPA documents. We are seeing the BLM get focused on topics that have never been challenged in a court of law. For example, applicants in Colorado working with the State Office are expected to provide PODs that are literally hundreds of pages and are being told this will protect the BLM from legal challenges. The legal challenge is usually coming from poor analysis.

Engage and listen to the public as often as it takes. Engage the NGOs early on the process. As an industry, we will regularly meet with various environmental groups on bigger projects to collect comments and to try to get the purpose of the project out to the public. Regularly engaging the communities that are presenting the challenges may result in a minimum having better transparency.

Involve affected Applicants in the development of Instruction Memoranda (IM). BLM developed IM WY-2016-018 to require large reclamation bonds for existing facilities. This IM stemmed from oil and gas operators that abandon wells and do not complete their required reclamation. The BLM incorporated electric utilities into this requirement. Electric utilities are in the communities for generations. The industry is stable and power lines are not abandoned and left on the landscape. Another example involved IM CO- 2017-003 which contained poorly worded fire-related stipulations being added to transmission line ROW grants.

Sit down with the environmental and engineering staff of an applicant. Identify what impacts are expected and focus the analysis on those impacts. For example, we recently completed an EA for the rebuild of an existing facility. We were not allowed to see what resources were going to be incorporated into the analysis. So we were surprised to see that crucial topics for electrical infrastructure such as migratory birds, noxious weeds, and soils were not analyzed. This has become a significant problem as we went to construction and the agencies started making demands for mitigation of these resources, even though they were not included in the EA analysis.

You can maintain 3rd party communication protocol and still ensure that the proper information is obtained. The BLM needs to recognize that it is possible to have open and transparent communications between the applicant and the agency.

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

The BLM can foster greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

The BLM must adhere to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

The BLM must base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement.

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Respect past decisions and protections such as National Monuments

Courts should narrow scope of litigants to real stakeholders. An example of participation of people and entities from someplace else having a complete misunderstanding of the real issues at hand was Baltimore, MD based PEER protests against last year's Vegas to Reno race.

APPLY DICTIONARY DEFINITION TO "SPECIAL" and "UNIQUE": There are places that are truly special and unique that rightly belong to all Americans in every state. Western states have given up a greater share than most states for the common good. There's people from other states that continue asking for us to give up more. Federal or not, what's not special or unique should be managed for the people most affected. It's not America's public land.

APPLY THE KISS PRINCIPLE TO SCALE BACK NEPA REQUIREMENTS TO FIT THE PROJECT: An example from community planning most people may be familiar. Planning to build a big project like a shopping center requires area planning and extensive studies and engineering to address infrastructure (traffic patterns, storm runoff thru the area, increased run-off from structure roofs, paved areas, etc.). Building a house planning can be done with cookbook formulas. Applying NEPA to small projects is unnecessary and prohibitively expensive.

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Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step. Protect the environment rather than looking for ways to use it.

This is probably the key to any improvement discussed above. Frivolous litigation being used as a weapon to change land use by stopping essentially all uses and getting paid for it is incomprehensible. This is sucking the life out of the agency's ability to responsibly manage the resources under their charge and the uses related to the same. No management or "natural regulation" will incur long lasting damage to the social, economic and ecologic sustainability of the resources The BLM manages for society. We must develop legislation that will either limit frivolous litigation, make the litigant pay for their efforts and be civilly liable for costs and damages caused by their actions.

You could limit this by limiting the issues that are covered in a scoping of a certain action. An action is generally developed to accomplish a specific goal on the landscape and has specific issues that are important to this action and goal.

Asking stakeholders for input in an iterative process will encourage trust.

Early-stage charrettes with stakeholders will allow for input and decrease tensions later down the road.

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Including the input of different jurisdictions will allow for a clear understanding of the risks of any given action.

Scientific uncertainty should warrant a more-inclusive, deliberative and "right-sized" process and outcome.

The BLM should follow the NEPA process as outlined in the law to avoid legal challenges.

The BLM should follow the NEPA process as outlined in the law; it prescribes appropriate review guidelines.

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If not already done, work on making it as easy as possible for entities to share data with each other. One example might be setting up a controlled-access database using an industry-standard software platform, where access could be shared with state, local, and tribal officials so that they could easily upload information.

My understanding is that much of the law is based on what a "reasonable" person think or do under a given set of circumstances. Based on this, grounding decisions and plans in science is likely to consistently provide the most defensible position.

Facilitation collaboration and communication with interested parties early and often also seems likely to reduce misunderstandings.

One thing to try might be to have managers make a statement of expected scale at the start of a given plan, and to use that statement to determine whether the plan needs to involve a small working group, a district office, a multi-field office, or nationwide BLM. I am not completely familiar with the current process regarding this issue, but it seems that an estimate of scale, performed by knowledgeable BLM managers at the beginning of a plan, would potentially save time and prevent argumentation later.

The presence of armed personnel automatically triggers negative reaction to the visual stimulus. Why invite trouble.

Recognize only State, County, and Tribal governments as coordinating entities.

Remove management of public lands with wilderness characteristics. Stick to management of public lands as they are designated.

Lobby Congress to remove "No-slaughter" regarding wild horses and burros.

Abandon "Landscape" scale analysis. Most affects take place within one-half mile of the surface disturbance.

Reduce time frames for NEPA analysis. Set minimal time frames--complete analysis or remove the restriction.

• Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

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BLM Field Offices should be encouraged to maintain an interested party call list. This should include other agencies, tribal governments, NGO or particularly interested citizens. When new projects emerge, a staff member from the BLM should make phone calls to these partners and inform them on what is going on and see if they have questions. This forms more personal relationships and allows interested parties to learn first hand what is happening. These individuals can also be beneficial for helping spread the word on specific projects that the BLM has going on.

The BLM should look for and engage in opportunities that allow for cross agency work.

In decision making processes, the BLM should be clearly considering ecological, social and economic factors. Do these projects make economic sense, do they benefit or at least not cause degradation to the natural environment, are they supported locally and socially? Using best available science to inform decision making and providing opportunities for the public to engage early on and multiple times throughout a NEPA process should also help later delays and minimize legal challenge.

For mining or exploration projects, the BLM should be developing clear guidelines early on for expectations in best management practices and reclamation of the site. This should always include a 3-5 year monitoring timeline after project completion and before bonds are released. Bonding should also be adequately secured to include unintended impacts on waterways and other sensitive resources. Bonding should fully cover remediation efforts in the event of site abandonment.

The BLM should invest staff time and energy into participation with collaborative efforts. Doing so can help to reduce challenges later on in the process by identifying concerns or problems early on so these can be addressed. Collaborative efforts have been shown to strengthen projects, making them less vulnerable to legal challenge. Collaboration should be supported and encouraged from the highest levels of the BLM so field offices know they have the green light to invest in these opportunities.

Encourage BLM staff to work with other agency staff when needed, especially on the issues that do not stop at jurisdictional boundaries (grazing, wildlife habitat, migration, etc.) This makes projects much stronger and scientifically sounder.

Don't short change the need to do analysis on projects. Often encouraging "minimum level" analysis results in stall outs later in the process because of legal challenges that come later. We see this all too often with mining projects in particular.

A more stream-lined process that is more responsive to the concerns of local governments and agencies and to the public will result in fewer lawsuits challenging BLM's Plan and land exchanges. The New Mexico State Land Office (NMSLO) suggests that BLM local leadership be given more autonomy and decision-making over the Planning and NEPA process, to facilitate faster decisions that better take into consideration local concerns and priorities. In and of itself, this is likely to reduce litigation.

The New Mexico State Land Office (NMSLO) suggests to BLM that environmental analysis focus on and address local concerns first, working closely and early on in the process to involve local governments and state agencies. Currently, BLM's analysis of the pending Rio Grande Del Norte-Sabinoso Wilderness Exchange is held up in review in Washington D.C., after resounding support from both federal and state local agencies and the public. Moving the direction and review of the scope of environmental analysis from local BLM to the centralized federal level reduces the ability of BLM staff to nimbly respond to local concerns, and to efficiently process and complete land exchanges.

Longer comment times for local governments

Remember Commissioners represent the whole county

This answer may not be appreciated. Stop allowing politics to unduly influence resource decisions. Make sure that the decisions themselves are grounded in their analysis. To avoid litigation delays make the process more responsive. How long does it take to receive resolution of an appeal to IBLA? Too Long! If something is taken to the court system, get some resource lawyers engaged to assist the litigation. Other than that, understand the system and don't just sit back and say it is out of BLM hands once it is in the court system. DOI needs to be engaged.

Look at the CEQ direction. Consider the direction for thorough brevity and do it. Look more closely at reclamation and the end result if the proposal is surface disturbing. Consider the scale of the action and its likely long term influence on the environment. The analysis should reflect the associated scale of activity.

More categorical exclusions

Off-site impacts that extend beyond any one community's or county's boundaries must be considered in analysis. Such impacts include, but are not limited to, impacts on air sheds, impacts from methane leakage, or watershed impacts from tracking fluid leakage, blow-outs and defective well casings.

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- Collaboration should begin early, before scoping (the process by which agencies solicit input on the issues to be addressed and how they will be evaluated), and allow everyone—ranchers; miners; energy developers; recreation groups; other federal, state and local agencies; and members of the public—to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

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- Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

- Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

- Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

BLM must make it easier for states to share data especially wildlife management data - and this goes both ways - you share your data and encourage the states to share theirs. You must respect their position and recognize that we all have the same goals and interests. of special importance is data on wildlife migration corridors, habitat info and other scientific data that is important to hunters, anglers and back country recreation enthusiasts.

The BLM must make every effort to involve, encourage Tribal governments to participate and should make special efforts to reach areas that lack access to electronic communications. The Tribes must be included and outreach is critical. Foster a we're in this together, we have the same preservation goals, foster respect for our native peoples.

Just like w/ the topic of transparency, greater collaboration and sharing of ideas will result in fewer challenges - this may seem time-consuming in the beginning but will pay off in the end. we can not continue the us against them paradigm.

Stick withe the science. Science based decisions, ecological as well as economic will balance responsible development w/ conservation.

keeping the public well-informed and providing adequate opportunities for participation should help reduce lawsuits.

Establishing a coalition of interested parties who can work together to participate in the planning process should result in fewer challenges.

Short-cuts should be avoided. this will minimize the vulnerability to legal challenges.

EIS is crucial - if the latest scientific information, public opinion point to the need for an EIS do no skip that step.

Build a consensus that everyone can get behind instead of doing it your way

Getting consensus of people who are directly affected by policy

Get more citizens involved in the process

Don't strongarm people because that leads to confrontation

The environment affects people so right size is where your trouble could start

Tread carefully

Do a Better Job with Socio-economics

REPEAL OR REFORM THE EQUAL ACCESS TO JUSTICE ACT

Quit Colluding With Special Interests

Limit Reviews/Revisions to the Minimum Required by Courts

Better Use of County and State Consistency Requirements

Make Decisions Locally with Coordination

Develop Better Adaptive Management

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Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

See Notes Below

See Notes Below

If all stakeholders in a planning issue are included early in the planning process and can give their input, later legal challenges will be minimized

This is related to the initial question - environmental and public opinion data should drive the analysis, even if the planning ahs to include several BLM offices

see 1st screen for Topic/Point "A" - all 5 are under it.

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5. Invest in training for BLM employees for their planning process including the ability for local governments to be cooperating agencies with BLM.

2. Assign a BLM representative as a planning liaison for each of the RMPs for tribes and local governments who can attend or participate in the planning team meetings and the local government meetings throughout the process.

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Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

Make the plan thorough enough to minimize the chance of legal challenge later in the process.

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A "Good Neighbor" would actually talk to it's neighbors.... the adjacent land and mineral owners. Industry is not your neighbor. Politicians and other government agencies are not your "neighbor". When you limit your contact to industry/politicians/activists, you completely disengage your true neighbors.

Get out there and fight the false narratives of those that are preventing you from doing your job. Your "neighbors" know these claims to be false, why are you not standing up for yourself? You have far more resources than private citizens to get your message out. All false narratives do is delay the process. You contribute to the delay by feeding into it. Delays like this in non-contiguous acreage positions literally harms your true neighbors, the adjacent mineral and land owners.

Know what you own ahead of time

Keeping the public informed with opportunities for participation, greater collaboration and idea sharing early on, making decisions based on data and science and honestly working to balance conservation of public resources with responsible development should, over the long run, minimize delays and lawsuits.

Communicate more effectively, this should not be a covert process. Let your neighbors be involved. Push back against false narratives.

No deed or title transfer to any outside foreign entity should ever occur. These are the mineral and land assets of the American people.

Provide appropriate notification of public hearings to your real neighbors, especially in the rural areas where there are non-contiguous acres and no daily newspaper outlets.

A one size fits all approach does not work for every location. There are big differences between large contiguous land/mineral positions of the western states compared to the segmented and fractured nature of places like the WNF. The WNF should be the poster child on what not to do regarding scalability. Here you involved 12 counties through only politicians and industry representatives of 3 geographically distinct and culturally diverse areas, where you only needed to involve one Ranger division in 2-3 counties and could have even been further pared down by township. Talk about a waste of time, money and resources!

When appropriate allow BLM to extend planning to multifield office or district level to better address cross-boundary issues and simplify the number of resource management plans.

Base plans on the latest data, science and public opinion in determining the extent/need for an environmental impact statement. Doing otherwise invites legal challenges and delays later on.

Eliminate the Social Justice section. This has absolutely no bearing on land use and only serves to generate unnecessary paperwork. Whether or not you decide to lease should not have any bearing on the educational background of people in a certain area.

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Being guided by the best science available, rather than by partisan politics and/or specialized commercial interests.

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Scoping meetings should encourage interactions among those with different views and backgrounds.		Stop trying to avoid controversy and concealing embarrassing information. You often lose lawsuits because of biased analysis or arbitrary decisions. Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.	Admit when illegal actions like chronic trespass grazing are occurring and are relevant to an analysis of effects.	More effective collaboration should reduce the prospects of litigation. Stop the bias against collaborating with environmental groups.		This category overlaps with the first one. Please see my comments under A. Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.	
When reviewing and commenting on EA & EIS documents, it would be beneficial if BLM can incorporate their comments directly into the EA or EIS document, via MS Word 'redline & strikeout' mode. currently BLM prepares a long table or letter and says "rewrite this sentence". Consultants cannot read BLM's mind. in some instances, it would be quicker if BLM just rewrote the sentence how they wanted it. BLM says 'we don't want to do the consultants work'; however, time is money; and multiple reviews/revisions of documents by BLM & consultant cost money. Streamline the process and have BLM enter in their comments redline / strikeout mode directly into EA or EIS.	The BLM has a use it or lose it policy for vacation. Therefore most staff take time off from mid-Nov to January 1. if you have a project permit seeking BLM approval, the circulation of your permit approval is stalled during the months of November & December and nothing gets done. Solution, don't have a use it or lose it policy. if there is work to be done, staff needs to be available to process permit applications. permit applications, the EIS process, can't be stalled for 1-2 months during Nov & Dec while staff takes their end of year leave.	the government should stop reimbursing NGOs for their legal fees. If NGOs had to pay for their own legal fees, they would not sue as much.	BLM needs more people trained in the NEPA process. Currently the BLM has only 1-2 NEPA specialists per office. if the BLM had more people trained in the NEPA process per office, they could review NEPA documents more timely, and they could prepare better documents (to ensure defensibility).	Reduce the appeal timeframe from 30 days to 15 days.	when projects are appealed, have a mandatory - court needs to rule on this within 45 days. these appeals cannot extend for years.	have a check list EA (there is not the need to prepare documents of hundreds of pages). All "existing environment" write up should already be within the BLM's RMP (there is no need to rewrite it within the EA or EIS).	instead of preparing hundreds of pages of text, use maps to easily convey/identify the existing environment.
• The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	• Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	• Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			• Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	• Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

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Make it easy for state agencies to share scientific date, such as information on wildlife habitats, migration corridors, and other scientific data with BLM, and vice versa.	Encourage participation by tribal entities and consider ways to communicate with tribal personnel and other interested parties if/where electronic communication is limited.	Follow the letter and spirit of all relevant laws and regulations (NEPA, the Wilderness Act, the Clean Water Act, etc.)	Early and ongoing collaboration as described previously, as well as sufficient opportunities for public participation, will reduce conflicts and delays during the process and make litigation afterwards less likely.	If decisions are based on sound science and carefully balance various interests in light of ecological as well as economic considerations as appropriate to the place/issue, litigation will be less likely.		Carefully consider up-to-date science, policy guidelines, legal requirements, and public opinion. When these point toward a full EIS, do one. Don't try to evade the law.	Do the planning at the appropriate level in accordance with the complexity of natural processes and units. Plan across agency offices - and even agencies - when that will yield better, more consistent, and perhaps fewer, plans and sounder management.
• The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	• Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	• Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	• Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			• Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	• Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
States should be able to access information. The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Native Americans have a strong interest in what is being planned. Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Taking into account and adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
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		Centralized data collection points	Round tables			Centralized data collection points	Round tables

Clear, concise statements with causes and effects spelled out. Editor, please!

Maintaining a dialogue with stakeholders is key.

Think globally, act locally. What are the long-term effects of the suggested rules or laws, and what precedents does this involve.

From the beginning institute a well designed plan that is invulnerable to legal challenges.

Collaboration should begin early and allow everyone to tell the BLM their wishes and concerns about the planning area, and share any data they have about the area.

Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

By adhering to science-based decisions, by considering ecological as well as economic values, by truly balancing responsible development with reasonable conservation, by keeping the public well-informed, and by providing adequate opportunities for participation should reduce lawsuits.

Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

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• Let BLM managers broaden planning to the district or multifield office level as needed to better address cross-boundary issues and simplify the number and complexity of resource management plans.

3. Do more than pay lip service to the economic and cultural impacts of the proposed action on local communities, landowners and businesses. Sec. 102 [42 USC § 4332] of NEPA requires that "proposals for legislation and other major federal actions significantly affecting the quality of the human environment" be analyzed and alternatives considered before being implemented. It was not intended to prevent productive use of resources or protect endangered species at any cost.

1. Comments should be given priority of importance, 1st those who have a financial vested interest, 2nd local governments and agencies, 3rd State government and agencies, 4th national government and agencies, 5th advocacy groups, 6th general public. The only entities that should be able to litigate are those with a financial vested interest.

2. To reduce frivolous lawsuits designed to delay action, those who appeal decisions should be liable for any harm they cause to stakeholders and the resources. Such as the lack of management of our forest because of law suits, which have caused our forest to burn up in catastrophic fires? They should not be rewarded through the EAJA, winning on one minor point of the numerous unscientific points and opinions they put forth, forcing the agency to go back and do more analyzing because of a summary judgment by a judge whose only understanding of the local resources or the management needed for health of land, is the propaganda that is put forth by obstructionist.

1. If an activity has been going on for years, (ranching, mining, farming, timber or other) and project falls in the normal course of use of land, (wells, fencing, roads and other infrastructure) the categorical exclusion should come into play. NEPA should not be necessary.

2. Use more Programmatic NEPA analysis so that NEPA for individual projects can just include any consideration specific to the area for which action is proposed.

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Mitigation criteria should be identified and established early in the NEPA process, including but not limited to applicable policies, guidance (IM's), regulations and state or other FLM requirements as appropriate.

Not all of the perceived "needs" of state and local governments, tribal partners, and other stakeholders are compatible with the protection of public lands. The BLM must not bow to local interests, whether for recreation, off-road vehicle use, mining, oil and gas development, grazing, or other uses that could be detrimental to the short-term and long-term health of public lands.

The BLM must request more resources at the local level for scientific research and for reviews of applications. Delays in NEPA reviews are often the result of limited funding and other priorities in local offices. There are not enough knowledgeable staff persons to complete the reviews in a timely manner. Delays can also be caused by the failure of the BLM to provide a comprehensive and well-written draft NEPA document. The NEPA scoping process should be improved and expanded. Timing is affected by local priorities and maybe the fact that the proposal is on hold due to economic considerations; e.g., uranium mines are on standby and do not know when, or if, operations will recommence.

One way to reduce litigation is to develop full EISs for all large hard rock mining operations and other operations that clearly will have a significant impact (particularly cumulative impacts) on the environment. For example, the proposed 10-fold expansion of the Daneros Uranium Mine, San Juan County, Utah, clearly warrants an EIS, rather than the EA that is currently being developed. A hard rock mine over 10 acres extent, where the site has already been adversely impacted by mining activities, clearly warrants a full EIS.

It can take years for the Interior Board of Land Appeals (IBLA) to make a decision. The BLM must demand more funding for the IBLA. It should not take 2 years for a decision on a small mining operation appeal, as has happened in an appeal I was involved in. I have also been given a decision in 2 weeks, overturning the local BLM office permitting decision, so I know quicker decisions are possible.

The BLM should develop meaningful regulations and guidance documents for regulation of specific aspects of land use on BLM administered lands. Currently, there is no meaningful guidance document for the regulation of hard rock mines, specifically, uranium mines. None of the BLM regulations address the unique aspects of uranium mining, including radiological and toxic contamination of land, air, and water.

The BLM has no radiological clean-up action standards and no specific requirements with respect the storage of low-grade ore, accumulation of waste rock, site erosion and degradation, dispersal of radioactive and toxic materials onsite and offsite, signage and fencing, reclamation, noise pollution, cumulative impacts, and similar impacts from uranium mine operations. This must change. The BLM must develop standards and requirements for uranium mines.

This question assumes that there are a number of alternatives for Environmental Analyses, where that is not the case. NEPA reviews must meet certain federal regulatory standards regardless of the "scale of the action." Sometimes, what the BLM or industry may consider to be a small action can have significant impacts, including significant cumulative impacts.

In general, the questions asked by the BLM are leading questions and not specifically geared to improving the overall regulatory programs of the BLM, improving the BLMs enforcement of existing regulations, or addressing the numerous other failures of the BLM to protect and properly manage federal lands over the past 50 years or more. Anything that comes from a directive by President Donald Trump and the current Department of Interior Director is suspect.

The BLM should provide an opportunity for public comment on supplements to Plans of Operations, particularly when the BLM has not enforced the requirements for Interim Management Plans. In 2014, a uranium mine permittee submitted Interim Management Plans for mines that had had several periods of suspension of operation over the previous decades. Yet, when the Plans were finally submitted to the BLM office in Monticello, Utah, the BLM did not provide any opportunity comment on the plans, which were rather generic and could have been greatly improved.

The BLM could build trust by requiring the update of any decades-old Plan of Operations that does not meet current standards for such plans. The BLM should not allow the continued operation of a hard rock mine based on a half-page (double spaced) description of a uranium mining operation, a half-page (double spaced) reclamation plan, and an Environmental Analysis that is only a few pages long. Nor, should the BLM allow for the operation of mines where there are no Plans of Operation; for example, the Sage Mine and La Sal Mine (part of the La Sal Mine Complex) in San Juan County, Utah, when there is no evidence of a Plan of Operations being submitted to the BLM and no BLM NEPA

have them posted on BLM website ??

use locally sourced / familiar to area and aware of impact of actions

The BLM should limit the total period of nonoperation of a permitted mine to 20 years or less and limit a continuous period of nonoperation to 10 years. The BLM must amend its regulations regarding temporary cessation of operation so that mines are not allowed to remain on standby indefinitely. The BLM should more clearly define mine "operation."

The 5-year reviews of cessation of operation (43 C.F.R. § 3809.424 (3)) must be meaningful and consider factors other than an acceptable surety. The BLM must also consider (but not be limited to): the condition of the mine and mine site, past operational history, current and past compliance with Interim Management Plans and other BLM requirements, current and past compliance with other applicable state and federal regulations, the status of the economic feasibility of expected restart (for example, the price of uranium over the previous 10 years), and likelihood of restart of mining operation in the near future, given the

- The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.

- Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.

- Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

- Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

- Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

- Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Maximize opportunities for state and local government active engagement in all steps of the planning process from pre-planning discussions through the final Governor's consistency review.

Maintaining constant communication in active engagement can go a long way to reducing litigation.

Researching to stay informed and active communication between agencies that might have already dealt with issues at hand. Thoroughness is good, though.

Support efforts to encourage Congress to adopt reasonable limitations on payment of legal fees to plaintiffs who challenge planning and project documents.

When significant substantive changes are made between the Proposed Action and the Final Plan, provide an additional but limited time for public comment before issuing the final decision.

Simplify the regulatory processes so that there is less opportunity for procedural challenges through litigation.

BLM should be authorized to develop generic NEPA analysis that can be applied by reference to proposed actions that are comparable in type and extent and are being proposed for lands that are similar in type.

From our experience working with local and regional BLM offices, we know that a short comment period or less opportunity for comment is exactly what we want to avoid. Adequate opportunities for comment allow for local stakeholders, local government, Tribes and tribal members, organizations like Friends of Cedar Mesa, and the broader public to have a say in how our shared lands are managed. Since all the hard work in creating BLM Planning 2.0 has been thrown out, we do not support any efforts to undermine public input into the NEPA process. If anything, public input should be expanded, especially when the agency knows an action is likely to be controversial.

FCM has had many positive experiences providing public comment on planning processes with the BLM and other agencies, particularly when paired with NHPA Section 106 consultation for cultural resource preservation.

As noted previously, the biggest way to avoid litigation is to get all the stakeholders together to plan at a landscape scale and find compromise before specific projects come up. If processes and their resulting decisions are open, transparent, and allow for robust public participation, there will be reduced conflict and litigation. More specifically, the BLM can follow through on all NEPA requirements such as relying on quality data, considering a reasonable range of alternatives and responding to substantive comments since these often drawn legal challenges and cause delays.

Because of suggestions in the public comment process and NHPA Section 106 process, the phases and techniques of a 2015 fuels reduction project near Blanding, Utah were changed to require hand-thinning techniques that are more protective of archaeology. This change also allowed for more wood to be cut and brought to nearby roads for personal in-home use by local Anglo and Native American populations. This shows how NEPA processes can be used to change projects and therefore avoid litigation.

No matter what, NEPA analysis needs to consider environmental impacts on behalf of the American public. This should never change. To address the issue of scale, the BLM can look to programmatic NEPA and flexibility in defining planning areas.

The use of categorical exclusions should be minimized to allow for a thorough analysis of impacts.
This would include using categorical exclusions for drilling, as an exclusion is not a "right-sized" analysis for this time of activity.

Recently, we experienced a land issue that exemplifies exactly what we don't want with NEPA and planning processes. In 2016, a local section of a significant cultural land feature, the Comb Ridge that was held in trust by the State of Utah, was offered up at auction. This culturally-rich square mile section of the Comb Ridge was sold without public comment and without consideration of what it means to the broader American public. For decades, it has been visited by Americans of all ages and backgrounds – and now it is closed to the public.

Take law enforcement rights away from BLM and retrain so they don't violate the laws of the public and create lawsuits for civil rights violations.

For documents that when the designation of an area has been made they cannot be changed. If environmental activists want an area and they get it they can't try to move into areas dedicated for the publics use.

Figure out actual impacts and no guess and hope. Actual not what ifs

Greater Attention to Economic Impacts of Decisions and Focus on Maintaining Historical Uses	Hire BLM Staff from the State and Local Communities and Provide Incentives for Employees to Invest in a Long-term Relationship in the Community	Better Incorporate Socio-Economic Information into BLM Documents	Repeal or Reform the Equal Access to Justice Act and Implementing Policies	Work with Department of Justice to Review Settlement and Dispute Resolution Policies	Definition of the Term "Immediate" in Wild Horse and Burro Management	Range improvements Should Receive Automatic Categorical Exclusions	Develop Adaptive Management Policies and Procedures
BLM land use plans and policies have significant impacts upon state and local governments throughout the west. Whenever BLM chooses to modify a grazing permit, deny access to a portion of land, slow down restoration and rehab projects, etc., the impacts may be small to a national economy, and may not have a large impact on the overall state economy. However, seemingly small decisions which appear to only impact a few users of public lands, often time result in great impacts to small rural communities throughout the State.	Residents of communities located near BLM land typically have the greatest understanding of the local ecosystem, range management practices, and socioeconomic conditions. Local residents are typically very well suited to staff BLM field offices. The BLM should prioritize hiring local residents so as to benefit from their expertise and build trust with state and local governments and other stakeholders. Many cities and towns near BLM land suffer economically due to over-regulation of resources and inadequate private land.	BLM planning and decision making has profound socio-economic consequences on the people who live and work in rural Utah. The livelihoods of thousands of Utahns depend on livestock ranching, mining, oil and gas extraction, and other multiple use activities that occur on certain BLM lands. BLM documents can avoid many legal challenges if the documents fully consider and analyze the socioeconomic consequences of a proposed decision. Although the BLM land use planning handbook does provide for the incorporation of socio-economic information, the handbook should be amended to provide for greater consideration of such data.	Although primarily a statutory issue, the Equal Access to Justice Act (EAJA) incentivizes constant litigation of BLM decision-making by special interest groups and is one of the primary impediments to timely and effective management. The EAJA program has effectively been hijacked by deep-pocketed organizations and no longer serves its intended purposes of empowering plaintiffs of modest means. The State encourages the leadership of the BLM and Department of the Interior (DOI) to work with members of Congress on ways to improve and reform EAJA.	The BLM has recently entered into settlement decisions that bind the BLM to implement plans that are not consistent with state law, policy or regulations and develop rules that were approved through the Administrative Procedures Act. Further, when entering into settlement, the BLM often pays exorbitant legal fees that do not go back to the land or improve state and local economies. The State requests	Wild horse overpopulation has become one of the most pressing issues impacting BLM rangeland in Great Basin. Although the Wild Horse and Burrow Act requires the BLM to "immediately remove excess animal from the range so as to achieve appropriate management levels" when it determines that overpopulation exists. However, courts have been hesitant to enforce this provision of the law because the term "immediate" is not defined in the statute. The BLM's management of wild horses and burros would be more transparent and consistent with the law if the BLM defined the term immediate in its land use planning handbook.	In Utah, successful wildlife habitat improvement projects frequently receive swift and efficient NEPA analysis under categorical exclusions. The use of these categorical exclusions has been a boon to wildlife by avoiding the long delays that afflict other projects requiring an EA or EIS. Unfortunately, range improvements on BLM land designed to benefit livestock typically require an EA, even when the impact of a range improvement is very similar to that of a wildlife habitat improvement project. BLM should resolve this inconsistent and duplicative problem by analyzing range improvements under NEPA categorical exclusions.	Adaptive management should be a standard part of BLM processes, and projects using adaptive management should require less lengthy analysis. In order to facilitate efficient and effective adaptive management, the BLM should develop specific policies and procedures on adaptive management which should then be incorporated into the BLM handbook. The BLM has said that it has "initiated an effort" to develop such policies and procedures, (see BLM Land Use Planning Handbook, page 36) but this effort appears to have stalled. BLM should swiftly complete policies and procedures on range management and add them to the BLM handbook.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
		Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.				No shortcuts anywhere throughout the process.	If the science point to the need for an environmental impact statement, do not skip that step.
		When addressing range health and "thriving natural ecological balance," the impacts of wild horses and burros must be analyzed in the context of livestock grazing impacts, the impacts of road-building for mining, oil and gas leases, and off-road vehicle use. Wild equines, whose numbers are dwarfed often 60 to one by cattle and sheep grazing permits, and whose impacts are dwarfed by other commercial uses of public lands, cannot be scapegoated for range degradation or habitat damage. Their positive impact to local communities, ecotourists, photographers, and other species should be fairly analyzed.	The BLM needs to present an EIS when there are significant effects from its proposed actions. It cannot short-circuit the NEPA process by ignoring the substantial, incremental effects of a given action or series of actions on natural communities, critical species and their habitat, and historical resources. Such species and resources includes wild horses and burros that are recognized by the 1971 WFRHBA as integral to the range environment. Likewise, the BLM should prepare an EIS whenever a given plan of action will have cumulative impacts, including indirect or secondary effects that can be reasonably foreseen.	The state and district websites BLM recently removed must be restored in order to provide stakeholders with the information needed to input NEPA processes. The public could visit these sites to have an overall view of the multiple use of our public lands, including mineral, oil and gas leases, the numbers of wild equines in holding, roundup plans and how many wild horses and burros were being adopted out by state. Eliminating this information amounts to censorship. It does not serve the BLM or the public. It is not NEPA-compliant.		See earlier comments regarding the need for EIS in appropriate circumstances.	
						Using Epex, we track and act only upon required processes, constantly working to make them more efficient.	Epex can be used for any repeatable process, allowing the users to manage by exception while the solution automatically moves through the steps of the process. Issues that arise are logged with action items and assigned to an appropriate user. Tasks and action items are on each users home page.
		Do the right thing and YOU WILL NOT GET SUED. YOU know what the right thing is. It is NOT rocket science.				Plan to help our fellow creatures. It is easy.	

Membership in organizations that take public positions for or against certain land uses, legislation or regulations relating to BLM, or which have been involved in legal action against BLM, should be forbidden for BLM employees, or at least, their participation in such organizations should be fully disclosed when they participate in NEPA analysis. This restriction would not apply to professional or scientific organizations which do take advocacy positions or engage in legal actions against BLM.

Do more than pay lip service to the economic and cultural impacts of the proposed action on local communities, landowners, and businesses. Sec. 102 [42 USC § 4332] of NEPA requires that "proposals for legislation and other major Federal actions significantly affecting the quality of the human environment" be analyzed and alternatives considered before being implemented. It was not intended to prevent productive use of resources or protect endangered species at any cost.

Encourage federal employees to participate in appropriate professional and/or scientific organizations. Certification of professional qualifications and participation in continuing education requirements for certification should be encouraged, or even required.

Simplify and clarify the procedures for preparation of NEPA documents and compliance with the ESA. This may require rewriting the NEPA and ESA legislation and/or rewriting the regulations based on the laws. Most of the litigation concerns procedural issues, not environmental ones. Federal employees should not have to be lawyers to do their jobs. If you BLM goes to court on the scientific basis for the decisions, you will probably prevail.

To reduce frivolous lawsuits designed to delay action those who appeal decisions should be liable for all court expenses if they fail to win the appeal.

If BLM will prepare documents that propose actions based on reasonable interpretations of environmental laws and that have scientific and economic merit, local people and honest scientists will help BLM prevail over frivolous lawsuits. A winning record will help discourage appeals.

Reduce the size and scope of NEPA to include only data and analysis specific to the local area and the action being proposed. Many NEPA documents contain extensive reviews of literature or descriptions of the local environment contain material that is either not relevant to the project in question or has been amply covered in previous NEPA analysis and need not be repeated.

For routine and accepted actions, it is sufficient to just state that the action will be carried out according to accepted best management practices and only include any issues of concern that are known or suspected to exist with the planning area. Building a fence requires adherence to BLM's best management practices and the law requires archaeology and endangered species be protected. The only NEPA issue should be the economic and environmental costs and benefits of building or not building the fence.

Be thorough and work with all sides of the issues.

Make it easier for BLM and states to share data —particularly wildlife management data. Include wildlife migration corridors identification, other habitat and other scientific data important to recreation groups

Encourage tribal governments to participate. Reach areas that lack electronic communications.

- Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.

- Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.

Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.

- Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.

Publish results of meetings. Stream live meetings.

Don't shrink already established Monuments!

Don't ignore the public. Don't make short comment periods.

Don't lease oil, gas, coal, etc. lands right next to National Parks and Monuments. Consider the whole ecosystem!

Don't undo the ESA, clean air, clean water, etc. protections to the environment.

Don't try to eliminate participation of the public.

NEPA when done properly is a good tool to analyze conflicts. Do it always!

That's tough. Two groups will always sue: big oil versus environment. If the public could vote on public land issues, some issues might stay out of court.

Allow a longer period of tl'm for public comment and read the emails.

3.Do more than pay lip service to the economic and cultural impacts of the proposed action on local communities, landowners and businesses. Sec. 102 [42 USC § 4332] of NEPA requires that "proposals for legislation and other major federal actions significantly affecting the quality of the human environment" be analyzed and alternatives considered before being implemented. It was not intended to prevent productive use of resources or protect endangered species at any cost.

1.Comments should be given priority of importance, 1st those who have a financial vested interest, 2nd local governments and agencies, 3rd State government and agencies, 4th national government and agencies, 5th advocacy groups, 6th general public. The only entities that should be able to litigate are those with a financial vested interest.

2.To reduce frivolous lawsuits designed to delay action, those who appeal decisions should be liable for any harm they cause to stakeholders and the resources. Such as the lack of management of our forest because of law suits, which have caused our forest to burn up in catastrophic fires? They should not be rewarded through the EAJA, winning on one minor point of the numerous unscientific points and opinions they put forth, forcing the agency to go back and do more analyzing because of a summary judgment by a judge whose only understanding of the local resources or the management needed for health of land, is the propaganda that is put forth by obstructionist.

1.If an activity has been going on for years, (ranching, mining, farming, timber or other) and project falls in the normal course of use of land, (wells, fencing, roads and other infrastructure) the categorical exclusion should come into play, NEPA should not be necessary.

2. Use more Programmatic NEPA analysis so that NEPA for individual projects can just include any consideration specific to the area for which action is proposed.

•Expedite and prioritize projects where local governments are attempting to partner with BLM to take over some of the land management responsibilities. (As an example, Cooperative Recreation Management Agreements).

•Adopt new policies or update the mining laws to prevent "new mining" claims on lands where an R&PP application has been applied for. Currently a jurisdiction has to wait for the NORA to be published, new mining claims should not be permitted once the R&PP has been filed.

Share the public comments on-line

build cooperating agencies & the public comments into the process

reach out to know litigators and bring into the process

current using EA vs EIS process

EA vs EIS currently getting BLM into litigation issues. A full EIS should be used to help minimize litigation issues

•BLM needs to develop range of alternatives within six (6) months after closing of the scoping period and publish them for thirty (30) day public comment period

Focus on being procedurally correct in the NEPA analysis. Activists are going to sue, but have been successful only when BLM is not procedurally correct.

Make sure all scoping comments have been addressed even those comments that were considered but not analyzed.

Make sure the analysis mirrors the proposed action and a reasonable set of alternatives.

In several situations the only two alternatives that should be analyzed are the proposed action and the no-action alternative.

Consistency and Administrative Review with local government and cooperating agencies.

Establish Geographic Boundary early and maintain.

Provide deference to private landowners on surface use agreements with federal mineral leases.

Consistent application with County Land Use plans.

Accurate and comprehensive Socio-economics information.

Reasonable alternatives should only include issues falling within the established scope of purpose and need.

Maintain the Geographic Boundary.

Avoid legal challenges in the first place.

I hope there is some sort of metric in place already to help determine how much analysis is given to each scale of action. Seems that there should be a smaller amount of analysis for actions that do not involve machinery, construction, grazing; i.e. "heavy impact" actions. Guiding non-motorized trips does not require as much NEPA analysis as rebuilding a culvert or re-developing a road.

Ideally, BLM NEPA documents would include impacts to local governments.

When creating a Resource Management Plan that will guide future management of public lands, we encourage the BLM to review local planning guidance documents to ensure consistency between the BLM and local entities. La Plata County has a Comprehensive Plan to guide future development of the County. Coordination between the BLM and local governments for future development and public lands would help to discourage future conflicts.

NEPA documents, specifically environmental assessments, are too long. Over-analyzing natural resources that will not be impacted makes the document longer and more time consuming to read. The BLM should really focus on reducing the length of NEPA documents. If there are no significant impacts or issues, then why are the documents more than 200 pages long?

The projects should be supported by science, not litigation.

Upgrade the technology and use existing platforms to determine who will be impacted.

The analysis should look at who is being impacted and what resources (environmental, community, socioeconomic and others) are being impacted. Contacting local governments, tribes and stakeholders early in the process – at the scoping phase - can help limit the scope by determining the potential impacts and those affected by them.

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

The nepa input of a single citizen should be considered with equal weight as that of a national organization. It is not fair that an organization of thousands of people who may never see this blm land can have greater weight than local people who use the land.

Have your employees well trained in nepa requirements, and do honest monitoring to maintain compliance. Take disciplinary action against employees who violate nepa, and against monitors who fail to perform properly.

Just good planning and monitoring.

As described in responses to A and C, a single process and a single comprehensive analysis for a project even if it crosses multiple agencies or jurisdictions would help to improve stakeholders' ability to participate in a meaningful way in the process. Equally important it would also help the BLM avoid potential legal challenges of piecemealing.

Early stakeholder engagement, including local and state governments, other regulatory agencies, and Tribes, would help to better establish trust between the entities and improve the opportunities for input from BLM's partners to be incorporated into the BLM's analysis and documents as they are developed.

BLM must actively involve land users (e.g. those with existing rights or authorizations) in agency efforts to change land use policies or BLM guidance (e.g. manuals, handbooks, etc.). The BLM should have sufficiently flexibility to continue pre-existing land use rights rather than retroactively imposing new conditions or requirements on pre-existing infrastructure.

The Agency's analysis should use the existing conditions as the baseline rather than a pristine or undisturbed setting against which to evaluate potential environmental impacts from a proposed project. This is particularly important when the agency identifies avoidance, mitigation, or restoration measures.

The Agency should perform an initial assessment to evaluate the impact of the proposed action based on available information and assumptions at the time that an application is filed, rather than wait for all survey, and analysis detail to be definitive.
o Based on this initial assessment a determination of the level of NEPA analysis would inform the applicant on how to proceed with non-federal agencies and non-governmental organizations.
o It would be understood that the Agency's final level of analysis may differ from the initial assessment in the event that the actual data varies from the initial assumptions.

•Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.
•Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well informed, providing adequate opportunities for participation should also reduce law suits.

•Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.
•Base plans on the latest information, science, policy and public opinion. If the science and or public opinion point to the need for an EIS, do not skip that step.
•Let BLM managers broaden planning to the district or multi-field office level as needed to better address cross-boundary issues and simplify the number and complexity of RMPs.

Invite tribes to be cooperating agencies in the NEPA process.

Provide updates, in person in key local communities if possible. Include any new or updated information. Continue to solicit comments and thoughts.

Research ecological impacts, determine ecosystem services valuation, consider the dual impacts of climate change and changes to resource managements, and in general ensure that ecosystems are considered fully for the value they provide as undisturbed areas.

There should be a process to stop a project (the "No Action" alternative) if there is a risk of permanent or impactful damage. The "No Action" alternative seems to be more of a placeholder than a real alternative when large industrial projects kick off the NEPA process.

Ensure community and tribal use of areas, particularly activities that are not permanently disruptive or that require intact ecosystems, are fully considered.

Be science-based. Design science-based research (if needed during the planning process), include tribal knowledge where the project(s) are in tribal areas. Engage local scientists from communities, possibly through a sit-down meeting (not a webinar) just with scientists in the area (including those at colleges and county or borough level). Consider allowing local non-government scientists to be called in as subject matter experts during the internal NEPA reviews (non-public discussion of draft chapters)

A standard 120 day review for all Environmental Impact Statements and a 60 day review for all environmental Assessments. Our public lands must remain in public hands!
Very large industrial projects, particularly those that have high risk to subsistence activities or traditional ways of life (including non-tribal traditional ways) should continue to require lengthy review.

Projects or land management changes which, combined with expected climate impacts on habitat, should continue to require lengthy review.

BLM needs to develop range of alternatives within six (6) months after closing of the scoping period and publish them for a thirty (30) day public comment period.

When creating documents, BLM needs to make sure they are compliant with the procedural aspects of NEPA and FLPMA.

Limit the range of alternatives and try to adhere to having only a proposed action and a no action alternative.

While all scoping comments have to be considered, BLM needs to be sure it is analyzing only those that are in relation to the proposed action and discounting those that are unrelated or unrealistic.

Limit the range of alternatives and try to adhere to having only a proposed action and a no action alternative.

Make use a RAC / Advisory council input's on responses to comments before publishing. Often litigation is undertaken because the response to the original concern is not detailed enough and/or is written in a manner that makes the submitter believe their comment was not seriously considered. By getting feedback from a RAC or Advisory council prior to publishing a more public-friendly response might be worked out that shows the comment was seriously considered and provide a more weighty response to why the comment could not be implemented.

Create new methods of consultation and stakeholder input. Move beyond sending out letters and awaiting responses – have online questionnaires, project dedicated websites, email/text prompts for pending deadlines, etc.	This is an often researched topic. Of related interest: http://library.rpa.org/pdf/RPA-Getting-Infrastructure-Going.pdf -- this is a 2012 planning roundtable document. It was developed by a very interesting list of contributors, and offers some sound case studies for best practices.							
BLM's credibility with its neighbors is harmed when planning and NEPA deadlines are routinely missed. For example, BLM's Washington DC office (WO) is slow and unpredictable in how it processes required Federal Register notices relating to important planning and EIS efforts. Local BLM project leads are often in the dark about how to navigate this WO maze. Top BLM management should ensure that Federal Register notices are handled by the WO in a timely, clearly traceable, and effective manner.		1. BLM should stop attempting to downplay, deflect, minimize, or ignore strong public concerns during planning and NEPA processes. BLM managers tend to want to avoid controversy at all costs, always put BLM in the most positive light, and conceal embarrassing or conflicting information. These tendencies often backfire and contribute to the frequently successful litigation against BLM. This is especially true with grazing related NEPA analyses.	2. BLM should not make NEPA promises or create performance expectations relating to monitoring and mitigation that it likely cannot keep. Even in an office that has lost over half of its previous range staff, managers are reluctant to acknowledge the practical reality of diminished capacity to do promised monitoring. BLM should be honest about its limited capacity and the likelihood that it won't be able to do many of the things that it ideally should be doing. Hiding the true facts and ignoring reality increases the chances for successful litigation against BLM.NEPA analyses.	BLM should more proactively encourage collaboration among different stakeholders and interest groups, including sportsmen and environmental groups. The prospects for compromise and reduced conflicts increase when there are face-to-face meetings and people with different backgrounds and viewpoints have an opportunity to build positive relationships. Sometimes collaboration works and sometimes it does not in solving controversies. Despite this uncertainty, BLM should nevertheless encourage collaborative efforts wherever possible. Nothing ventured, nothing gained	see earlier comments			
Realize the value of mineral development to the communities, states and tribes and account for such within the agencies joint analyses.	Realize and communicate the value of mineral development to the communities, states and tribes.	Develop a legally defensible EA template that will consistently be applied throughout a state office for all project proponents seeking to bring forth a project. BLM could address this through an instructional memorandum, and doing so would make the documents much more defensible, as deficiencies within the document would be more readily apparent.	Evaluate, via a Solicitor's Opinion, BLM's jurisdictional authority to impose surface-based stipulations or restrictions on fee lands.	Follow NEPA regulations and applicable guidance, and require comments/protest to be specific to the lands being offered for lease based on peer reviewed supporting data before delaying action. EAs should use a consistent template or format across all field offices, to the extent that is possible.	EAs are frequently required by BLM when they're not necessary, as CX or DNAs should be sufficient to meet CEQ's NEPA compliance.	Adhere to the CEQ's Guidelines concerning EA review periods, which states that EAs should be completed within three months.		
		Land use plan decisions are subject to protest procedures under the regulations at 43 CFR 1610 and are not subject to the potential lengthy appeals to IBLA under 43 CFR 4. Most other decisions of the BLM, however, are subject to potential lengthy IBLA procedures. The Department and BLM streamlined the approval process for priority solar and wind energy projects by issuing decisions not subject to appeal to IBLA. It is recommended that the BLM consider approving other high priority leases and authorizations (oil & gas, geothermal, coal, mining, powerline and pipeline), especially those leases and authorizations consistent with existing approved land use plans, without appeal to IBLA.	The following language was used in the decisions for priority solar and wind energy authorizations: "approval of this decision constitutes the final decision of the Department of the Interior and, in accordance with the regulations at 43 CFR 4.410(a)(3), is not subject to appeal under Department regulations at 43 CFR Subpart 4.400." These decision packages for priority projects were signed at the Department level and were reviewed at length by the Office of the Solicitor. There were very few delays associated with subsequent legal challenges due to this upfront review by the Office of the Solicitor.		Most implementing actions and approvals of leases and authorizations on the public lands are consistent with land use allocation decisions already made in existing approved BLM land use plans. The scope of the NEPA analysis for these actions should therefore be limited to the very site-specific affects of the proposed action and not readdress the previous land use allocations addressed in the land use plan decision. A Determination of NEPA Adequacy (DNA) or a limited scope EA should be the starting point for the level of NEPA analysis for most proposed actions on public land that are consistent with land use allocation decisions from an existing approved BLM land use plan.	A major EA or an EIS for a proposed action consistent with an approved BLM land use plan should be the exception rather than the rule. The NEPA analysis should only focus on those significant resources of potential affect and not all resources that exist in the area. These other identified resources can be cross-referenced to previous discussions included in the existing land use planning documents. Using a geospatial database system, as noted in other streamlining recommendations, for identifying resource data layers and documenting land use plan allocations should also assist in more focused NEPA analysis for specific implementation actions or proposed actions on the public lands.		
Meaningful consultation for ANCs includes, but should not be limited to, consultation on: identification of planning issues; preliminary resource management alternatives and preliminary rationale for alternatives; the draft resource management plan or amendment (including potential ACECs and any special management attention that would occur if they are formally designated) and associated draft environmental document; early notice of any final decisions that may have a significant impact on ANC land interests; and implementation.	Meaningful consultation for ANCs also includes, but again is not limited to, providing reasonable advance notice to ANCs of all local meetings, to ensure that ANCs have the opportunity to participate at the community level—to hear firsthand the issues, concerns, and recommendations being raised by stakeholders at that level, and to be in a position to meaningfully provide their views or additional data or information to help inform the planning process, when appropriate.	BLM should establish appropriate policy and guidance with regard to wilderness characteristics that is consistent with the agency's multiple use mandate. Although BLM Manual 6320 outlines several outcomes from considering wilderness characteristics in the land use planning process, recent BLM resource management planning decisions have failed to apply this guidance in a way that provides stakeholders with reasonable clarity as to how BLM will manage lands with regard to those characteristics.	For instance, in the recently-issued Alaska EIRMP, BLM erroneously conflated reduction of impacts to wilderness characteristics with maintenance of wilderness characteristics, and expanded the roles of wild and scenic rivers, ACECs, Primitive, Semi-Primitive, and Backcountry recreation management zones, and riparian conservation areas, by asserting that it will manage these area in a manner consistent with maintaining wilderness characteristics over the life of the plan. Such obfuscation over how BLM intends to address management of wilderness characteristics under the plan inappropriately results in the potential for vast areas of lands to be managed as de facto wilderness.	BLM should emphasize that management planning decisions relating to wilderness characteristics must be based upon careful and reasoned consideration of the specified factors, including "whether the lands can be effectively managed to protect their wilderness characteristics" and "the extent to which other resource values and uses of lands with wilderness characteristics would be forgone or adversely affected if the wilderness characteristics are protected." These factors are particularly important in Alaska, where significant tracts of land have been selected and are likely to be conveyed under ANCSA and where access to non-federal inholdings, guaranteed under the ANILCA, will be needed.	Consistent with the BLM Manual, BLM must meaningfully "engage cooperating agencies, the public, and other interested parties" [including ANCs] in the land use planning process as it relates to the management of lands with wilderness characteristics." BLM should revisit its policies and procedures to ensure that such engagement takes place in a meaningful way.			
		Follow FLPMA and manage for multiple-use and sustained yield. Recognize that you are going to be sued no matter what you do. Make decisions and move on.			Routine or activities with known disturbance of public land should be processed with an EA or categorical exemption.			

Disband the practice of privatizing public lands and public resources (i.e., wild horse off-range holding facilities are generally closed to the public, though the public still owns and pays for these animals and their care).	Throughout the West, the BLM is seen as a paramilitary organization, with the obvious fracturing of trust this brings. Empowering local people (i.e., citizen science teams), getting more employees more "face time" in rural areas, and less military-style operations would go a long ways towards healing the broken public trust. Hiring people with actual relevant knowledge in a given location would also help. Westerners in general do not appreciate East Coast lawyers telling them what will or will not work in a given watershed.	VERY SIMPLE: FOLLOW THE INTENT AND THE LETTER OF EXISTING LAWS!	Accept that legal challenges are a necessary and important component of democracy, and plan for them. Eliminating them is a short road to tyranny. If the laws are good and are followed, spurious challenges are already easily discarded.	Recognize your responsiblity to the public and the public trust first and foremost - not the wealthy private interests who can and do budget for full time lawyers to challenge and weaken the laws which protect the public interest. Accept that these players have a lot to gain and the public has a lot to lose -- and your primary duty is to uphold the public trust. Spend the money the public needs on better legal defense teams or we all lose. Lawsuits are a fact of life so avoiding them by kowtowing to special interests is not only foolish but unAmerican. Go long for our people.	VERY SIMPLE: FOLLOW THE INTENT AND THE LETTER OF EXISTING LAWS!	Recognize what all biologists already know, that wider areas can and are affected by smaller, focused actions within an ecosystem, and address the upfront research needs responsibly. Narrowed focus may speed up the process but will externalize numerous costs which can and often do have lasting negative consequences.	Hire more "boots on the ground" with an emphasis on documenting both small and large scale consequences of a proposed action, including the "known unknowns." We have plenty of people interested in environmental careers but who find no sustainable career paths, especially in the current administration. Set up more paid internships with solid career pathways and get our best and brightest in the field and at the drawing boards.
The BLM should make it easier for states to share data—particularly wildlife management data—with the agency and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and the BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy, and public opinion. If the science and/or public opinion point to the need for an environmental impact statement, do not skip that step.
BLM should make it easy for states to share fish and wildlife data such as the location of important fish, wildlife and hunting/fishing areas, and the economic value of wildlife viewing and hunting and fishing. BLM should incorporate information from the Western Governors Association's wildlife corridor initiative into the Assessment Report and the planning effort.	State Game and Fish agencies should be invited to participate as a Cooperating Agency in the planning process to allow for more efficient sharing of information and ideas. Tribal governments should be encouraged to participate, and BLM should make special efforts to reach areas that lack access to electronic communications.	The benefits of collaboration and effective public involvement far outweigh the costs in terms of time and money. Early participation of stakeholders can help to avert later feelings of policy imposition and coercion. By increasing participation on the front end, the threat of litigation will be reduced because those groups that are likely to sue have already been included in the process.	Collaboration and effective public involvement will improve the planning process by reducing the need for costly and time-consuming supplements that can delay decision-making. In addition, BLM should: o Adhere to science-based decisions that fairly considers and balances ecological and economic values, o Adhere to all applicable laws and administrative procedures and thoroughly document all decisions.			BLM should not take “shortcuts” that will make a RMP vulnerable to a legal challenge later in the process.	BLM should base its plans on the latest information, science, policy and public opinion. If the science and or public opinion point to the need for an EIS, do not skip that step.
		Solution #1: Streamlining Protests See link in additional comments.	Solution #2: BLM Protest Response Deadline See link in additional comments.	Solution #3: Full Force and Effect After Denial of Protests See link in additional comments.	Solution #4: Remove Interior Board of Land Appeals Process for Timber Sale Decisions See link in additional comments.	Solution #1: Page Limitations for Environmental Assessments See link in additional comments.	Solution #2: Tiering to Programmatic EISs See link in additional comments.
BLM should make it easier for states to share data – particularly wildlife management data – with BLM, and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important for hunters, anglers and other backcountry recreation.	Tribal governments should be encouraged to participate, and BLM should make special efforts to reach areas that lack access to electronic communications.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well informed, providing adequate opportunities for participation should also reduce law suits.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.			Do not encourage so many shortcuts that a plan is vulnerable to legal challenge later in the process.	Base plans on the latest information, science, policy and public opinion. If the science and or public opinion point to the need for an EIS, do not skip that step.

Eliminate the practice of utilizing geo-spatial tools as the centerpiece of analysis and decision-making. Tools such as rapid eco-regional assessments (REAs) and habitat equivalency analysis (HEAs) only scratch the surface of data gathering and should drive agency decision-making. There is no substitute for localized data collection that is ground-truthed for reliability. Too much emphasis has been placed on predictive trends, identifying regionally-significant riparian habitats and estimating habitat loss. Not enough focus is being placed on local land use conditions and implementing management objectives grounded in multiple-use.

BLM must retain flexibility in land use plans to address the needs of various state and local governments and tribal partners. Accordingly, the agency should move away from the "zoning" approach where certain classes of activities are prohibited or intensive uses are directed to a specific area(s) for administrative convenience or reasons grounded in pressure from non-governmental organizations. This trend grew out of the renewable energy boom (designation of solar energy zones or SEZs) but does not work well for other types of land uses (e.g., mineral exploration and development, linear projects, grazing).

BLM should provide increased training to dedicated staff who then become planning team leads. Those team leads should then select third party contractors who have land use planning expertise and appropriately direct and manage those contractors to ensure quality documentation that will withstand judicial scrutiny. NEPA processes (both planning and project level) have become consultant driven with the tendency to over-analyze for the sake of covering every conceivable baseline condition and potential effect to the detriment of quality documentation that meets the specific criteria of the planning regulations.

Rigidly adhering to the provisions of FLPMA and the planning regulations will lead to defensible NEPA documents, plan amendments and revisions. Law suits are inevitable but when filed, the agency should vigorously defend their analysis to put an end to the "sue and settle" phenomenon. Non-governmental organizations (NGOs) constantly allege NEPA deficiencies because it is common for agencies to cede to their demands for additional analysis instead of defending the analysis that was completed. NGOs then seek reimbursement of their fees under the Equal Access to Justice Act and the cycle continues. The number of legal challenges can be reduced by eliminating this practice.

The utilization of "administrative designations" that severely limit land use activities should be eliminated to the extent possible. The designation of Areas of Critical Environmental Concern (ACECs), Resource Natural Areas (RNAs) and Back-Country areas has become prolific. In addition, other special management areas (e.g., SEZs, military land use nexus zones) and related plans (e.g., Travel Management Plans, Visual Resource Management Plans) layer additional management restrictions that are impossible for stakeholders to navigate and BLM to administer. These designations trigger lawsuits which would be reduced if eliminated.

BLM should make modifications to plans, revisions or amendments when valid protests warrant. Too often, BLM will reject valid protests for invalid reasons anticipating that protesters will not take the next step to appeal the decision. Legal challenges may be reduced by virtue of earnestly working to resolve protests instead of flatly dismissing them.

Quality NEPA analysis that is consistent with the requirements of FLPMA and the land use planning regulations is critical. Quality is often sacrificed at the expense of quantity under the guise of creating a defensible NEPA document. BLM must provide adequate and specialized training to its planning leads. In turn, those agency professionals must be responsible for monitoring the process, focusing the analysis on significant issues and not be led by third party consultants who may not be motivated by strict regulatory compliance or appropriate scale.

Consider smaller planning areas that are sub-regions of a geographic area associated with a particular field office. This can be authorized by the State Director pursuant to existing regulation (43 C.F.R. § 1610.1(b)). Aspects of regional and ecosystem planning may have intellectual merit or appear attractive in terms of reduced workload, but they are not practicable, timely or cost-effective. Modern land use plan revisions can take over a decade to complete. This is not what Congress intended and BLM cannot properly serve its customers (i.e., the public land users) by continuing in this fashion.

Within each Arizona planning effort/document, BLM should identify the importance of our state's rich heritage and historic traditions of hunting and angling and the yearly economic contributions from sportsmen and sportswomen. BLM should work collaboratively with State governments to manage and conserve game and sportfish species and their habitats in a manner that respects private property rights and State management authority over wildlife resources.

The planning rule should direct BLM to develop overarching procedures and implementation handbooks/guidelines in coordination with state agencies to minimize negative impacts to statutory authorities and the state's ability to fulfill state trust responsibilities. BLM should also provide explicit direction designating a timeline and process for collaboration and conflict resolution between BLM and state wildlife agencies before the release of any final planning documents with potential to impact state jurisdictional authorities and its ability to manage wildlife on public lands.

BLM should provide explicit direction providing a specific designated timeline and process for coordination with the state wildlife agencies during the development of any planning regulation or guidance.

Too often agency BLM policy, including for NEPA, is issued in memoranda, guidelines, bulletins, and the like, that bind the regulated community without adherence to the processes required by the Administrative Procedure Act.

DOI should issue a directive to its bureaus, including BLM, to not issue such binding documents without compliance with the APA.

BLM should focus on the proper scope of the NEPA document and should include only the part of the project over which the agency has approval authority or should utilize "small handles," which is when BLM has statutory authority to approve only a small part of a larger project.

If BLM has no authority to influence the non-federal activity (legal control and responsibility), it should not include that activity in its NEPA analysis. In other words, federal jurisdiction over a small part of a project should not force the whole project to be reviewed, rather only the section on federal land should be reviewed.

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If a project (such as a wind met tower) is of a type or in a category known to have no significant environmental impacts, it should be categorically excluded from the requirement to prepare and EA or EIS.

BLM should add to their list projects that are likely to be considered categorical exclusions (CEs).

Cooperation– the BLM should work collaboratively with AZGFD to manage and conserve game and wildlife. Any planning rules should also include an assessment and impact on hunting, angling and recreational shooting to ensure there is no net loss to these pursuits.

The assessment of wildlife migration corridors across the landscape would be a critical step in supporting responsible management of all wildlife.

The restoration and enhancement of habitat is extremely important to sportsmen. Too many BLM managed habitats are threatened or negatively impacted by noxious weeds and destruction from feral burros.

The BLM should prioritize and accommodate active management on the landscape to improve, restore and enhance key habitats, by identifying habitat in need of restoration and enhancement during the assessment stage, with clear objectives for desired conditions throughout the process.

Burro numbers are out of control! We would implore you to manage these feral animals as previously outlined in your management plans. Our native wildlife is suffering at the mouths and feet of these animals, including some of our endangered species. Burro mitigation and control efforts should be included for any planning areas where they are found.

The BLM should not develop procedures, rules and guidelines for planning in a vacuum. Coordinate the efforts with the state, AZGFD and municipalities to minimize negative impacts on their respective state trust responsibilities and jurisdictions.
The BLM should provide direction outlining designated timelines for collaboration, cooperation, and conflict resolution prior to the release of any final planning documents that might negatively impact state jurisdictional authorities for the management of wildlife on public lands, including any that might involve special designations.

Provide the public with adequate notice of the impending plan, as well as a fair amount of time to comment on the matter, at least 60 to 90 days.
A potential planning rule should fully analyze the impact of any potential loss of public lands to multiple-use and wildlife related recreation.
Wildlife, wildlife resources and AZGFD's authority and need to proactively manage wildlife should be a key component considered in any special land use designation under review.

We support tracts of intact and undeveloped habitats commonly referred to as "backcountry" because they are important for fish, wildlife and public lands hunting and angling. These intact habitats should be conserved, restored and enhanced, but at the same time, sportsmen and women need to be able to access these lands and the BLM should ensure access is not negatively impacted. While we support the identification and conservation of backcountry areas, we do not believe those efforts necessarily need a special designation in order to achieve those results.

Most sportsmen support habitat conservation along with balanced energy development. Proper planning can ensure both are possible, but that planning should not be limited to just oil and gas leases, it should also include wind and solar energy developments too. There are wildlife and habitat issues that emanate from wind and solar developments. These plans should be specifically identified in the BLM planning regulations to ensure the responsible and balanced development of our public lands with a conservation eye towards both the landscape and the wildlife.

One such action that is in dire need of attention is a comprehensive analysis of the impact feral burros are having on our Arizona landscape. As stated previously, wildlife habitat in our state is being destroyed by burros and populations of native wildlife are suffering because of them.

A comprehensive analysis of the feral burro on Arizona's wildlife and wildlife habitat might be just the impetus needed for some overdue revisions to the Wild Horse and Burro Act.

Consider and offer non-Federal solutions to collective management challenges, such as allowing NGOs to assist in visitor education, trail/facility maintenance, and routine monitoring.

Implement existing laws and regulation as they were intended not according to DC agenda. Exercise good judgement and commonsense.

Tier analyses effectively. Avoid entangling broad programmatic vision with site-specific detail, so that programmatic planning can resume its proper limited role.

Have a productive dialogue with stakeholders. Work towards a solution that works for all parties. Be creative problem solvers.

Incentivize collaborative solutions. Use ADR more frequently and creatively to force career litigants away from ideology and organization building into fishing or cutting bait on real solutions.

DOI must avoid encouraging and supporting alien (environmental) interest group litigation that supports an outside the regulations DC agenda.

BLM, DOI, other agencies and non-Federal partners must meaningfully contribute to reasonable statutory and/or regulatory reform. It is not 1970, we have overshot the preservation target and created too many impediments to reasonable action.
We need to have consequences (pay legal fees) for outsiders that initiate frivolous law suites to delay or ruin allowable land use projects.

Accept that litigation is sometimes the hallmark of a successful process and is often unavoidable.
Litigation need not equal "delay" where there is no injunction.

See E.1 above- narrowly define purpose and need and adhere to those boundaries.

Exercise good judgement and commonsense in the NEPA process. BLM often uses excessive time and effort to diesect projects that will have a minimal or no impact even in the worst case situation. Use your time wisely

Consider establishing page limits for certain projects or documents. Re-create a possibility that an RMP can again be a 30 page exercise in broad visioning.

Ample regulations and laws are already on the books for major projects. Enforce them in ways that they were originally intended. Match the NEPA effort to realistic future impact. A lot of projects are burdened NEPA overkill and a waste of BLM man power and time.

Train BLM employees and teams on the importance of becoming involved in local communities and activities so they are better understood and accepted as part of that community rather than uninformed outsiders who are here for a short time to dictate to us. TENURE is a good plus for BLM employees to establish a trust relationship, they gain respect and confidence and get better cooperation and management. These valuable employees do not create a relationship that results in a misuse of any resources as has been a concern by some high level government administrators in the past.

Continue Secretary Zinke's "Build the Trust" efforts. It is most productive to have him visit the western public land states and listen to issues, concerns, and solutions submitted by affected members of the public and local government entities. Consider a Roundtable style meeting in each public land state that invites people as representatives of various public land multiple uses. This has proven to be most effective and gave the Secretary a chance to talk with the user representatives concerning issues and the needs for change. Lincoln County was part of the June 26 Pahrump round table with Secretary Zinke and found him to be receptive and interested in issues and solutions discussed.

Implement greater flexibility for field specialists on policy and guidelines when applying and using adaptive management. A good start would be set up the LUPs as a guidance document and is much less stringent.
Review and change the misuses that are occurring on the Equal Access to Justice Act, by the anti-grazing and environmental groups. They have effectively used this source to sue BLM, mostly based on procedural issues, not substantive policies.

Establish a state committee of resource experts to conduct an independent review of a challenged document, including field evaluations if necessary, to either support the BLM position or provide recommendations on how to change and improve, with the preparation of a written report on their findings.

Take another look at the Public Rangelands Improvement Act of 1978, (P. L. 95-514, 43 U.S.C. section 1752) and the initial Nevada Section 8 approaches to allotment management plans and their challenges to proposed projects. Emphasize the importance of using this very beneficial approach to expert review and overview of a contested project. When a Section 8 review team report supports the BLM's position or proposed project, the Court would need to look very closely at the challenge and its validity.

Re-emphasize the potential for using Categorical Exclusions as an expedient means to get emergency resource treatments accomplished where necessary. Wildfires, associated runoff, protecting essential sage grouse habitat, moving cattle to non-used pastures can be used in effective fuels management targets. Emergency post fire seedings for watershed protection and erosion controls that hit the critical planting windows should warrant the use of a CX.

The right size EA deserves a serious review by the legal community that is familiar with public lands resource management and actions that typically lead to litigation. Issues like land disturbing activities on watersheds, critical habitats, waterways, and water supplies. Grazing and recreation should not be associated with this category.

Thoroughly trained NEPA specialists that work as a team could be a positive influence on developing iron clad NEPA documents. Emphasis should be on expediency and strong expertise in getting the job done and permitted so the necessary action is not held up by bureau policy and the "cannot do that" attitudes prevalent in much of today's BLM staff.

Every BLM planning and NEPA process must include a county/counties/state preferred alternative. This alternative would be the local Federal/Natural Resources Plan in the county master plan or be developed to be consistent with this plan. BLM should be directed to select this alternative or provide very clear and justified rationale when this alternative is not selected (or even components are not selected).

The BLM planning and NEPA processes should give deference and have a strong bias towards use and selection of local, user and stakeholder coordinated initiatives (i.e., Coordinated Resource Management, Nevada Collaborative Conservation Network).

The BLM planning and NEPA processes should give deference and have a strong bias towards use and selection of local, user and stakeholder coordinated initiatives.

Support Equal Access to Justice Act (EAJA) reform. Litigation would be reduced if EAJA loopholes were closed that allow special interest groups to bankroll their litigious actions.

BLM should better implement and give deference to results/outcome based management rather than rigid boxes. Examples include rigid "on/off" dates for grazing which often reduces flexibility and often forces graziers to be in the wrong place at the wrong time. Outcomes must be monitored using trend monitoring, not monitoring snapshots in time. To assist, BLM should consider using stewardship contract-type management. Results speak for themselves in defending against litigation.

Much of the cumbersomeness of NEPA has been facilitated through case law. We believe misguided court actions on NEPA must be reined in through Congress. Congress could provide clarity on what "major federal actions" require EISs and what could be covered under EAs or CXs.

BLM must employ full use of categorical exclusions (CX) under NEPA and development new CXs to separate "major federal actions" from minor actions. Don't "settle away" tools in the tool box in litigation like was done on some CXs.

BLM should complete more programmatic NEPA to tier to.

DOI should consider regulatory revisions that better define the scope of environmental review for particular kinds of actions. A good template is regulations by the Corps of Engineers. For example, the Corps permits river crossings, and it has well-developed policies that limit NEPA analyses for proposed river crossings to the crossing site and nearby uplands, and exclude review of the project as a whole. Clear jurisdictional lines improve legal defensibility and the length of legal challenges.

DOI and the Federal Government should consider supporting legislation to either repeal the Equal Access to Justice Act or means-test eligibility for fee shifting. The EAJA was intended to facilitate meritorious claims by resource-poor plaintiffs to enforce federal law. Today there are a large number of professional non-governmental organizations that are very well-funded and bring large volumes of litigation solely to impair federal resource development. In that context, the EAJA facilitates excess and abusive litigation.

A thorough Environmental Impact Statement for the leasing of significant amounts of coal (+100 million tons) and other resources is appropriate, since the leasing decision establishes the primary federal and lessor obligations. For all subsequent decisions, including mine plans, exploration plans, and lease modifications, there will seldom be reason to do more than an EA, and many decisions can be conducted under a CX.

Coal lease modifications should be handled with categorical exclusions or at most an EA. The limitations on acreage inherently minimize the impact of the modification, and any environmental review should focus on new effects not considered in the original leasing NEPA document.

Within each Arizona planning effort/document, BLM should identify the importance of AZ's rich heritage and historic traditions of hunting and angling and the yearly economic contributions from sportsmen and women including: approximately $54 million for wildlife and habitat conservation, $1.2 billion to the state's economy, support for more than 18,000 jobs, and $132 million in state and local taxes (State of Arizona Proclamation on hunting and fishing signed by Governor Douglas A. Ducey on September 16, 2016). The planning rule should direct BLM to consider and analyze impacts to the economic and recreational values of hunting in agency actions.

BLM should work collaboratively with state wildlife agencies to manage and conserve game and sportfish species and their habitats in a manner that respects private property rights and state management authority over wildlife resources. The planning rule should direct BLM to evaluate the effect of agency actions on trends in hunting and fishing participation and address declining trends by implementing actions that expand and enhance hunting and fishing opportunities.

The planning rule should direct BLM to develop overarching procedures and implementation handbooks/guidelines in coordination with state agencies for areas of mutual interest and management authority. For example, lack of meaningful coordination with state agencies during the development of the USFS Planning Rule and complete lack of coordination on subsequent implementation guidelines, significantly increased state agency appeals/objections. This resulted in unnecessary and costly state and federal planning delays.

If social trust is a precious commodity, then trying to dissuade people from cynicism is a priority. Working with law students in your vicinity, including those who might be studying in more distant regions, and therefore becoming acquainted with different cultures within this huge country might lead to the development of documents that convey both acquaintance with local culture and other models that could work in the future. Involve law students who are "diverse," so that local people who may be largely from one background, also become more familiar with the diverse face of the U.S., whose citizens are stakeholders in our public lands.

Direct BLM to ensure effective communication with interested parties, clear and concise writing of documents, adequate time for review, effective notice of availability, and meaningful incorporation of comments. Develop a designated timeline/process for collaboration and conflict resolution between BLM and state wildlife agencies before the release of any final planning documents with potential to impact state jurisdictional authorities and its ability to manage wildlife on public lands to avoid costly and unnecessary administrative/legal appeals, and to comply with federal laws including the Governors' Consistency Review to ensure consistency with state plans, policies, and programs.

The BLM should provide explicit direction for a specific designated timeline and process for coordination with the state wildlife agencies during the development of any planning regulation or guidance including policy, rules, manuals, handbooks, and plan amendments to facilitate appropriate state wildlife agency involvement, including the development of guidance for special designations or allocations including wilderness, wilderness characteristics, Areas of Critical Environmental Concern (ACEC), Wildlife Management Area (WMA), Recreation Opportunity Spectrum and Visual Resource Management classifications, Cooperative Management Area, etc.

The planning rule should direct BLM to use the 'Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners' as well as the existing Travel Management process for designating roads through the 'Route Evaluation Tree Process,' which is an effective method of planning/collaboration. Through these processes, the Arizona Game and Fish Department and BLM Arizona have experienced a tremendous amount of success in building science-based, defensible Resource and Travel Management decisions.

BLM should abide by statutory and regulatory timeframes for completing NEPA analysis. When an EA is required, BLM should ensure it is completed within a 3-6 month period, per the Energy Policy Act of 2006, and when an EIS is required, it should take no longer than 18 months, per Council on Environmental Quality guidance.

In many ways, BLM is at the mercy of the federal courts, which have construed the requirements of NEPA to require more procedure and delay than Congress ever envisioned when enacting the statute. Because of the myriad requirements contained in regulations, policies and other guidance documents, it is very easy for environmental groups to find deficiencies in documents to exploit in court. When the documents are several thousands of pages with several thousands more pages of supporting studies, it is very easy to flyspeck BLM's analysis to find a supposed deficiency. BLM should therefore do as complete a job as possible, but more robustly defend itself from the inevitable court challenges.

It will remain difficult to create legally defensible documents as long as they are so long and complex. Several policies enacted without Congressional mandate or a rulemaking process during the Obama Administration should be overturned, as they created more complexity and made planning documents even longer and more indefensible. The complexity of the sage grouse plans and their associated Instruction Memoranda are a case in point, as is the Master Leasing Plan process. While redoing the sage grouse plans will take time, the IMs and the MLP policies can be overturned in short order. BLM should also consider simplifying other policies and guidelines to reduce vulnerability in court.

The Administration should work with Congress on ways to limit opportunities for unaccountable groups to sue to stop energy projects that create jobs and economic opportunities. Having the Administration support legislation to prevent the use of the Equal Access to Justice Act as a means of using taxpayer dollars to fund litigation from large environmental groups is one way. Another is reducing the statute of limitations for legal challenges to energy projects from six years to ninety days, the same timeline that energy developers and lessees must meet to challenge federal decisions.

BLM should support legislation to limit venue for actions challenging energy projects on public lands or leasing decisions to either the judicial district where the project or leases exist/are proposed or the D.C. District Court, which has broad jurisdiction and an extensive history of analyzing regulatory issues. Requiring litigation to be filed in one of these courts would more closely align the action with a court that has the appropriate expertise.

The NEPA process is initiated for wells on private or state lands even when only a minority of the oil and natural gas resources being accessed are federal, using the "federal nexus" as a reason for BLM to become involved in wells in which it has only a minority of mineral interest and/or when the well is not on federal or tribal surface. Once BLM determines the federal nexus requirement is met, it holds up development of individual private minerals, potentially for years, while conducting NEPA and permitting. Rather than undergoing that additional NEPA, BLM should recognize its minority interest and determine that additional NEPA is not required.

BLM frequently requests information that is not required in the EA but would be beneficial for BLM to collect. This information is collected at the company's expense and is often unrelated to the project. The scope of EAs should be limited to information that is truly required for NEPA compliance, and field offices should be directed to stop requesting additional information for its own benefit and is inconsequential to the project at question.

The planning rule should direct BLM to analyze and minimize negative impacts to wildlife related recreational access in special land use designation areas and provide for development of alternate access routes when existing designated access routes are closed across private land.

The planning rule should direct BLM to demonstrate the mutual agreement/concurrence of the state wildlife agency and USFWS for all fish/wildlife conservation, protection, and management plans. (Ex. 'The Secretary of the Interior, acting through the Director of the U.S. Fish and Wildlife Service and the head of each appropriate State fish and wildlife agency for the State in which the public lands are located, shall develop a comprehensive plan, reflecting mutual agreement regarding conservation, protection, and management of fish and wildlife resources for conservation and rehabilitation programs to be implemented on public land under his jurisdiction.)

The planning rule should provide for adequate public/formal comment periods of at least 90 days. Pre-NEPA consultation should not be a replacement for adequate public and formal evaluation/review of draft proposed planning documents. Reducing public comment periods may appear to reduce the process timeline, but more often leads to additional conflicts, appeals, objections, and litigation, delaying the overall process and implementation of decisions.

The planning rule should direct BLM to fully analyze the cumulative impacts of further loss of public lands that provide for multiple-use and wildlife related recreation and economic opportunities prior to recommending or approving special land use allocations and designations. The Multiple-Use Sustained-Yield Act of 1960 and the Federal Land Policy Management Act of 1976 prohibit federal agencies from affecting the State's jurisdiction/responsibilities. Managers of public lands are mandated to provide multiple-use recreational opportunities on public lands to present and future generations.

Wildlife, wildlife resources, and the Arizona Game and Fish Department's authority and need to actively manage wildlife must be included as a primary component and/or priority characteristic of any special land use designation including, but not limited to: national monuments, recreation management areas, Recreation Opportunity Spectrum allocations, wilderness, and recommended wilderness.

The planning rule should direct BLM to include Species of Greatest Conservation Need (SGCN) and Species of Economic and Recreational Importance (SERI), as identified by the Arizona State Wildlife Action Plan, within planning documents in an analysis of effects to such species. If the proposed action in the NEPA analysis potentially adversely affects any wildlife species, the responsible Federal official must make the relevant information available to the public and inform decision-makers and the public of a reasonable alternative to avoid or minimize those impacts.

The planning rule should direct BLM to recognize recreational shooting as an appropriate and publicly valued activity under federal multiple-use mandates and cite the importance of hunting and recreational shooting as a gateway to hunting (Executive Order 13443). Include EO 13443 in all planning documents and direct agencies to 'Increase structured hunting programs and recreational shooting opportunities as a means of achieving a net increase in federal land hunting'. Include reference to Pittman Robertson funding (derived from firearms and ammunition sales) that provides for wildlife and habitat conservation on public lands.

The planning rule should define dispersed recreational shooting as "any shooting that is carried out in a legal and safe manner, does not cause resource damage, and does not result in litter" to distinguish between responsible target shooting and irresponsible recreationists engaging in illegal activities including littering, poaching, and intentional destruction of vegetation. Further restrictions and/or elimination of areas due to a minority of offenders does not provide a balance of multiple-use and directly impacts responsible shooters.

BLM should incorporate local socio-economic data into management plans.

Tribal partners should comply with NEPA, regardless of whether the land is held in trust status by the Bureau of Indian Affairs.

Listen to local stakeholders and find solutions that address all concerns. Fear of lawsuit should not outweigh common sense and making the right decision.

BLM should adhere as closely as possible to congressional intent (viz., assuring the multiple-use policy is followed on public lands)

Let common sense be the guide. Smaller actions/projects should have an appropriate and similar corresponding NEPA analysis. The same can be applied to larger proposed actions/projects.

BLM should strive to work with landowners to accomplish mutually beneficial outcomes. Duplicative process could be reduced by partnering and coordinating with permittees.

BLM needs to uphold the agency's current commitments and management practices. Without this, it is hard for conservation districts to fully trust BLM.
Wild horse & burro populations should be properly managed based on sound, scientific rangeland health practices to ensure protection & preservation of critical native wildlife habitat & multiple land use.
BLM cannot provide any special management/protections of abandoned, feral, stray or otherwise unauthorized horses & burros. The BLM cannot grant any special management area designations for WH&B's outside of currently defined HMAs.

BLM should only apply wilderness area management techniques on federal lands officially designated as wilderness study areas. Wilderness study areas are not permanent designations & adequate reviewal of area designations is required.

A change in several federal laws is required to reduce the numerous frivolous lawsuits BLM faces when it comes to enacting its federally instructed charges. Congress needs to provide the general public full access to data giving accurate representation of the administration of EAJA. That access would allow for the tracking of EAJA disbursements, including information regarding plaintiff organizations, attorney's fees and monetary awards distributed as a result of actions undertaken on EAJA. The EAJA should additionally be amended to disallow reimbursement of legal expenses to any party that does not have permanent residence in the immediate affected area or is not personally impacted.

BLM needs to strengthen the protest process to dampen the recent trend to "sue and settle." BLM should ask Congress to enact legislation that would require plaintiffs in legal actions over resource management decisions to bear the costs of litigation & all other costs caused by an inordinate delay in implementing agency-approved management plans, including requiring posting a bond in the amount of at least $100,000 to guarantee the costs of such actions.

When civil action occurs related to the management of wild horses & burros on private lands, local courts in the state where the issue develops should preside. When federal lands are involved, the nearest federal court to the lands where the issue arose should preside.

BLM needs to clearly define what the term "'may be" adversely affected' means. Without a clear definition, no improvement can be made to reduce the number of frivolous lawsuits waged against BLM.

To more closely match the level of NEPA analysis to the scale of the action being analyzed, BLM needs to work with the local units of government. When conducting the environmental assessments or environmental impact statements, BLM should invite the local governments affected to work in step as the cooperating agencies they are in order to use their local knowledge and expertise to streamline the process.

Stop violating NEPA, EPA, and other public land laws.

Keep engaging stakeholders to reach thoughtful, science-supported, coordinated public land use plans instead of giving out public lands and public lands leases in a firesale.

Leave it alone. The NEPA analyses are fine.

EEI believes that the production of NEPA documents that are consistent in format and based on the best science available is key to avoiding delays associated with legal challenges. Project proponents desire regulatory certainty; and while that may not always be attainable, moving forward in the process as designed is the best way to arrive at a decision for a project.

As stated in B, early stakeholder engagement is crucial to identifying project concerns early in the process so conflicts can be resolved. Our industry regularly meets with various environmental groups on bigger electric infrastructure projects to collect comments and to try to get the purpose of the project out to the public. Regularly engaging with concerned communities may result in both greater transparency and forestalling future judicial challenges.

BLM should try to utilize Categorical Exclusions or Cat Exes as much as possible; especially in areas where surface disturbance impacts have already occurred. Categorical Exclusions can be processed fairly quickly, thereby allowing applicants to complete projects in a timely manner while still ensuring natural resource protection.

One of the primary limiting factors in public lands grazing management has been litigation. It is problematic that members of the "interested public" are given equal status to grazing permittees in management actions. Those with long-term contractual agreements, such as grazing permittees, should receive stakeholder status beyond that of the "interested public". The role of true stakeholders needs to be enhanced and further defined.

Activist groups engaging in habitual litigation abuse and attempting to drive agency policy through legal harassment should not be guaranteed stakeholder status or otherwise rewarded for their behavior.

The grazing permit renewal process has become far lengthier than is practical due to NEPA requirements. NEPA and/or its implementing regulations need to be amended to focus NEPA review at the Land Use Planning level and not at the implementation-decision level—such as grazing permit renewal. This one change would greatly streamline the decision-making process for agency staff in the field and allow them to adequately manage the land, as opposed to being behind a desk working through exhaustive procedural documentation.

To allow more appropriate, site-specific, and landscape-scale management, grazing permit renewals should be exempted from NEPA review. Rather, grazing should be generally authorized through NEPA documentation at the land use planning level. Then allow land managers the flexibility to manage in accordance with current climate and ecological factors—such as for wildfire prevention.

WMA believes BLM should consider the performance standard history of the proponent. Companies with high proven standards should undergo less vigorous agency review.

The BLM should hire and train personnel who are qualified to coordinate projects and lead teams. Too often the project leaders were promoted beyond their skill set into a leadership position, but cannot lead, decide and act. Once these people are in place they need to be given more authority to move project along in the process, quickly, efficiently and in compliance with established programs.

WMA believes BLM should exercise its statutory flexibility when warranted. When NEPA reviews are not necessary or warranted, the agency needs to act rather than become mired in processes that produce nothing meaningful. Minor revisions to plans of operations often become subject to such unnecessary actions.

NEPA reviews should be focused and not include unnecessary items.

BLM must recognize that they cannot prevent litigation in many cases. Collecting data and creating analyses that are beyond the appropriate scope of a project merely delay the process and often create additional issues for litigious groups to use challenge.

BLM should take into consideration different resources and plans based on individual characteristics and input from proponents.

WMA believes BLM could use a tiered NEPA review process tied to a proponents' past Environmental Assessments as many past plans are very similar to current plans of operations.

BLM's objective should not be to eliminate legal challenges but rather to fairly and consistently administer its legal authority as mandated by Congress. Doing so will of its own accord lead to greater defensibility. BLM's actions are defensible when they rest on (1) consistent approaches to developing administrative records for decision, (2) pertinent science and specialized experience, and (3) best practices developed and shared among district offices and within the Interior Department to ensure efficient use of governmental and non-governmental resources.

The creation of a streamlined approval process for emergency and maintenance activities associate with electrical infrastructure in areas previously reviewed by BLM should be a priority focus in efforts to right-size the level of NEPA analysis.

BLM should consider fully adopting an "issues-based" approach already in use in some district offices. Under such a procedure, any components of the environmental, cultural, or historic review that are not an issue in a particular project or request for authorization are summarized, providing an explanation as to why further review is not necessary and dispensing with that review. Such an approach would save substantial time and resources.

Create a policy of "no sue and settle" with litigious organizations. The documents usually are not the problem, the problem is that BLM will not defend them in court.

Begin interacting with local and state governments at the outset of an action. Invite them to contribute through either cooperation or coordination. There will always be conflicts but there are more when local government's priorities and plans are not considered.

Stop writing NEPA documents that analyze everything in the world, with citations. Create documents that analyze only the affected environment and defend them.

Create programmatic analyses for normal actions such as permit renewals.

Do not make it possible for lawyers to earn a fortune by attacking the BLM and the project proponents, all the while being paid by the taxpayer.

Expand the Categorical Exclusion provisions. For small projects, you tie up a whole lot of BLM talent that can not be put to good use elsewhere. If BLM personnel are nit-picking some small litle item, the other projects are held up, thus the economy stagnates. Trust your managers to make good decisions. If they can not make good decisions, transfer them to a non decision making role.

The BLM can create legally defensible documents and avoid legal challenges by acting within the scope of the law P rior to issuing a decision record, the BLM should consult individuals or organizations to address legal concerns.
BLM has historically moved pushed forward ill-conceived, highly controversial proposed actions with utter disregard for the preference of the American people and for existing policies and laws which govern the agency.

The BLM has much discrepancy when it comes to taking actions. NEPA should always be adhered to because it was instituted to protect the public and the agencies from taking action without considering all available information. It's unfortunate when the BLM receives valid information and ignores it.

Extensively and technically train BLM employees and teams at the Training Center, including on the recognized importance of becoming involved in local communities, sports, service organizations, churches, etc. so they are better accepted as a part of the community rather than uninformed outsiders that are here to dictate to the locals. Utilize local research as a first approach to solutions and to help avoid litigation.

Tenure in a BLM District is a plus for a good employee to establish a trust relationship. With more resource familiarity and user interface on management and problem solving, they gain respect and confidence from the state and locals resulting in better cooperation and management over the long haul. As such they are more able to sell needed changes and experience management on the land. We learn more when allowed to be there long enough to see our plans through to fruition. These valued BLM employees do not create a love relationship with the users that results in misuse of the resource, as has been the concern of some high-level government administrators over the years.

Use greater care with policy and guidelines development, allowing greater flexibility for the field specialists to be nimble and flexible in applying and utilizing adaptive management. If too rigid, the anti-grazing and other organizations will quickly find openings for legal action. Stated in another way, make LUPs "advisory" in nature or a "guidance" document and much less prescriptive.

Establish a state committee of resource experts (i.e. University, USDA ARS, State Dept. of Conservation & Natural Resources; State Dept. of Agriculture, Conservation, Wildlife, USDA-NRCS) to be available to conduct an independent review of a challenged document, including a field evaluation if necessary, to either support the BLM position or provide recommendations on how to improve it, and prepare a written report of their findings. While this approach might not solve every challenge, it would likely help the Administrative Law Judge (ALJ) or Interior Board of Land Appeal (IBLA) in their opinion and ruling determination if supported by such a committee of experts.

Revisit the Public Rangelands Improvement Act of 1978, (P.L. 95-514, 43 U.S.C. Section 1752) and the initial Nevada Section 8 approach to addressing allotment management plan (AMP) challenges to proposed projects, emphasizing the importance of having and utilizing this very beneficial, yet seldom utilized approach to expert review and overview of a contested project. If a Section 8 team review and report supports the BLM's position or proposed action, the Court would need to look very closely at the challenge and its validity.

Reassess Categorical Exclusions(CX's) as an expedient means to apply emergency resource treatments. Examples might include wildfires with the need to access ACEC's or wilderness areas to fend off fire movement, protect critical sage grouse habitat, or move livestock to pastures that are not scheduled at the time for grazing, and also flooding or other emergencies. CX's should also apply in the case of fuels management where targeted livestock grazing can be utilized to remove flashy fuels (i.e. cheatgrass) at the proper time to protect other resources. Emergency post wildfire seedings for watershed protection and hitting the critical planting window should also warrant use of a CX.

This subject warrants serious review by legal scholars familiar with public lands resource management and the actions typically leading to litigation. The issues that would likely most qualify would be land disturbing activities that impact view-sheds, critical habitat, waterways and water supplies. Grazing and recreation are uses that typically would not fall into this category.

Carefully trained NEPA specialists working as a team could potentially be a significant factor in developing mostly "bullet proof" NEPA documents. The emphasis should be on expediency and strong expertise in getting the job completed and permitted so needed action does not become strangled in bureaucratic policy and "can't do's".

WDFW appreciates the opportunity to partner with BLM in restoring habitat and species. For example, in eastern Washington, we have worked with BLM for years on greater sage-grouse, sharp-tailed grouse, pygmy rabbits and ferruginous hawk conservation.

Address existing problems with "Equal Access to Justice" provisions, which have been and continue to be badly abused. Aggressively challenge both "standing" and lawsuits that are based on unreasonable premises, and establish a reasoned basis in case law.

Proceed with the analysis and decision while any lawsuit(s) is pending, with the consideration that a judge may consider and issue a stay, if appropriate and warranted.

Eliminate the practice of "sue and settle", as a practice that promotes collusion to the detriment of the public good.

Keep in mind that in today's environment these documents are likely going to be challenged regardless of how "bulletproof" the environmental analysis is. Taking longer time for document review and belaboring unnecessary analyses does not help avoid a challenge and in fact, may only provide more topics for scrutiny.

The first step in conducting a right-sized analysis would be to determine if a Categorical Exclusion (CE) can be applied to the project. CEs are underutilized by the agencies and should be encouraged by the agencies where appropriate. Where CEs are determined to be appropriate, they must be adequately documented as they will undoubtedly draw challenges from stakeholder groups. However, the use of CEs can cut significantly back on the resources needed for NEPA projects.

If a CE cannot be applied, BLM should utilize a pre-screening process that identifies and assesses resources and potential impacts, considering direct and indirect impacts only at this stage. Base the level of analysis on the relative area of impacts and nature of the proposed disturbance. Establish initial screening criteria and thresholds. Levels of analysis may include; 1) EA; 2) Expanded EA; and 3) EIS. To date, whether or not a proposal would potentially be controversial has entered into the determination of level of analysis. This is inappropriate, as the analysis should focus on the proposed action and potential impacts, rather than perceptions and politics.

Reexamine the NEPA regulations regarding document length and detail. The CEQ issued guidance (2012) that highlights the original intent of the regulations. EAs were originally intended to be approximately 10-15 pages while EISs were typically up to 150 pages, but could be as large as 300 pages. Based on recent coal mine project approvals, the length of EAs can be over 300 pages while EISs take up volumes of binders. BLM needs to set limitations on document length and a reasonable level of detail that is required for various types and sizes of projects. The routine of overcompensating for perceived deficiencies with additional and often unnecessary analysis, detail, and length must stop.

Maintain the thorough NEPA review process to ensure that negative environmental impacts of large projects are minimized.

We must live with the long-term consequences of land use decisions made by federal land managers. Maintaining the thorough NEPA review process will ensure that negative environmental impacts of large projects are minimized.

The BLM should evaluate ROW access agreements for roads and transmission lines that cross BLM lands based upon the impact to the public land without triggering BLM permitting process on private land. For example, when one transmission line crosses 99% private land and crosses BLM land for 1% of its length, the applicant is required to provide BLM analysis for 100% of the line. The BLM should not require 100% analysis on these types of projects and should allow for appropriate levels of analysis based on individual projects.

Based on current science, perch discouragers are not effective and should not be required for new projects or recommended for maintenance projects. (See APLIC www.aplic.org). They can also create maintenance challenges and safety issues for electric line crews who climb and work on these structures. BHE has been required to install perch discouragers on some transmission lines in sage-grouse habitat within its service territory pursuant to agency stipulations. BHE has monitored lines to assess discourager effectiveness from 2012 through 2015, indicating that perch discouragers are ineffective with a 2.4 higher perch rate, higher raptor and corvid perching, and 93% mechanical failure.

Ensuring staff knowledge of the fundamental tenants of the agency's authority and processes as well as having some knowledge of the industries regulated by the agency is key to ensuring the agency is advancing legally defensible, durable decisions.

Consistency with state policies and regulations is key to avoiding contentious litigation. To the extent that states have developed plans to address issues under BLM review, the agency should seek cooperation, not controversy. For example, RMPs should be consistent with state sage-grouse executive orders (EO) and plans that may states have invested significant time and resources into in the development of workable solutions. Having different requirements or core area habitat boundaries than states leaves the BLM vulnerable to litigation with states and other stakeholders.

In correlation to Solution #2, Sage-grouse are a trust resource of the state wildlife agencies, and therefore the states should act as the lead regarding sage-grouse conservation and management. Likewise, for trust species under the jurisdiction of the USFWS, such as migratory birds, endangered species, and eagles, the BLM should coordinate with USFWS, who is the lead agency for these species.

NEPA documents that are consistent in format and based on the best science available is key to avoiding delays associated with legal challenges. This consistency can only be achieved through detailed directives, guidelines and/or standard operation procedures put forward by State/Regional Office personnel. The BLM must use these detailed directives, guidelines and/or standard operating procedures to implement the NEPA process successfully. Inconsistency opens doors for legal challenges. A significant concern is when BLM decision makers avoid making decisions because they are anticipating legal challenges. To avoid a more protracted process, make a decision in a timely manner.

The BLM has recently required EAs for maintenance projects, when they have previously analyzed similar projects with Categorical Exclusions (CX). BLM should remain consistent with historical precedent on future maintenance projects. For example, if a certain type of maintenance project received CX clearance, the same projects should receive CX clearance in the future.

The BLM should try to utilize CXs as much as possible especially in areas where surface disturbance impacts have already occurred. Although some surface disturbance impacts on public land are pre-NEPA, it is possible to collect natural resource data (biological, cultural, etc.) to identify past impacts or to identify potential future impacts based on newly proposed activities. CXs can be processed fairly quickly, thereby allowing applicants to complete projects in a timely manner while still ensuring natural resource protection. If the NEPA analysis on a proposed action proceeds a reasonable range of alternatives, it reduces the potential for legal challenges and subsequent project delays.

The agency must always keep in mind its fiduciary responsibility to the American public as it manages public lands for the benefit of All Americans. To this end, collaboration and information dissemination should begin very early, and the agency should be as open as possible in promptly and widely disseminating information regarding proposed projects, and in providing adequate opportunity for meaningful public comment.

The agency must respond to public input by adjusting its plans in response to both public comment and relevant scientific information.

The BLM should collaborate across offices and with as many stakeholder groups as possible in as open a manner as possible. This will ensure better land use planning and fewer legal challenges. The agency must always keep in mind that an open planning process which relies on the best science available and which engages all affected stakeholder groups is necessary in order to best manage the nation's public lands under its jurisdiction.

The agency must base its decision on good science, rather than on political expedience. Such science must include ecological and wildlife considerations. The agency must keep in mind that it is entrusted with the responsible management of the nation's public lands for all Americans, for a wide variety of sustainable uses as per both the 1971 FPLMA and common sense. BLM lands cannot thrive or support these uses if the agency ignores good science. Economic values are also to be considered but not to the exclusion of environmental factors. The agency must also keep in mind that economic values are often dependent on ecological health.

The BLM must use NEPA where science and public opinion indicate. The agency has in the past tended to under-use NEPA and has often attempted to skirt NEPA review for proposed projects and actions which do indeed have major environmental impacts. The agency must never skirt NEPA analysis or attempt to take shortcuts to such review. Such attempts to skirt NEPA will ultimately result in more legal challenges and poorer planning decisions.

To streamline planning, the agency must start with the latest and best scientific and policy analysis, and, as trustee of the public's lands, it must also engage the public in its plans. If science and public opinion indicate the need for NEPA analysis, then the agency must conduct a full NEPA analysis.

BLM could provide more training to its planning staff on the BLM NEPA process as defined by existing regulations, CEQ guidelines for NEPA, and the legal framework from established case law. In many cases, BLM planning staff do not have the knowledge and background required to guide the agency through a legally defensible NEPA process.

BLM could choose the level of NEPA analysis only after scoping comments have been solicited and reviewed. Current practice is for BLM to announce the level of NEPA analysis (EA or EIS) when soliciting scoping comments. This does not allow for BLM to consider the level of public controversy or other potentially significant issues that arise during scoping prior to determining the level of NEPA analysis. Determining the level of NEPA analysis after scoping would allow the level of analysis to more closely match the scale of the action being analyzed.

BLM could consider beginning complex analyses directly following scoping, but prior to full NEPA development. This could result in a more manageable (right size) NEPA process and outcome document. Starting complex analyses prior to preparing a full NEPA process could help streamline the length of time that cooperators are involved.

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 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 RPM 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.

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.

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.

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.

Be willing to have work done by volunteers. Offer volunteer, internship opportunities as these are ways for BLM to get work done and for others to find out about BLM.

Get material into the public's hands early. Make it accessible and not something we find out about because some intern in a lobbying firm in DC is searching thru the federal register or pops up because of a google alert. Get the word out to the public.

Listen to the public's suggestions and if possible adapt BLM's procedures to incorporate suggestions. This allows for public by-in to the process rather than the feeling things are purposely hidden by BLM.

Help in finding solutions, what can stakeholders do to help the process along?

By including the public and stakeholders in the process the whole way, all can see what is being done before it gets to the litigation phase.

BLM staff (including managers) must be honest and straight forward with the local government officials. After several blatant lies to county commissioners, permit holders, etc., trust is potentially impossible to reestablish with that staff remaining in the office. Ex: Field manager requested funding from the County and the oil and gas industry to do a project indicating that they couldn't move forward without the funding ($300,000+). The County and industry did not contribute but within two months, the project document was released with significant challenges for the County and industry that appeared to be retaliation for lack of contribution.

Trust can be built by using local governments' input and Land Use Plans that have been vetted through a public process. While allowing all Americans' the opportunity to comment and offer suggestions, input from the locally elected officials must be weighted much heavier.

While Congress must act on this, BLM must provide Congress with real information about how the Equal Access to Justice Act (EAJA) is paralyzing the agency to the point they cannot take the necessary actions to meet their mission. The cost of planning, defense of decision, payment of EAJA to plaintiff, next round of planning, lawsuits, etc. is a primary cause of the agency not being able to meet their mission, "to sustain the health, diversity and productivity of the public lands for the use and enjoyment of present and future generations". This loophole provides taxpayer dollars to fund special interest groups to continually sue the federal agency.

Consider reforming EAJA or policy so that when a special interest group litigates and wins over an ideology in the name of conservation or environmentalism, that at least 50% of the monies reimbursed for legal fees needs to be used for on-the-ground conservation of that species or environment. For example, if a special interest group files suit over Sage Grouse habitat, and is successful in winning the suit, that group must apply a least 50% of the monies reimbursed to restoring or mitigating habitat for Sage Grouse.

Reduce the length of the EIS/EA planning and decision documents. By drafting 100 – 1,500-page documents, you are providing that much more information for them to file suit on. That large of document cannot be followed and understood by anyone but gives ammunition to litigious groups.

EA's must be reduced to a size and scale that allow for meaningful input. One hundred plus pages of an EA are an indication there is a lot of fluff and CYA included rather than "here is what we are proposing" and "this is why". The length alone, deters many local governments as well as private citizens from engaging in the process because it is extremely intimidating and time consuming. They are currently being developed in a manner that requires legal or specialized assistance for interpretation.

In 1987, The Executive Office of the President's Memorandum to Agencies: Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations found at https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf #36 answers the question re: How long and detailed must an EA be? The Council advises keep EAs to not more than ~10-15 pages.
36a. How long and detailed must an EA be?
"...the Council has generally advised agencies to keep the length of EAs to not more than approximately 10-15 pages."

BLM should strive to be a good neighbor by doing their part to prevent and eliminate invasive species.

BLM should publicly recognize the important role that permittees play in partnering to manage and improve lands.

By clearly defining who is allowed to participate in the process and the weight their comments will carry.
This can be achieved by:
1. Moving from "coordinating" with state & local governments to "partnering"
2. Adding a consistency review for agencies & local governments
3. Moving to weighted comments -- Those that have a tangible interest in the land and are economically affected ("affected parties") by the planning outcome should have a higher say in the process than those whom hold a purely physiological interest ("interested parties").

By adding tangible numbers and trigger points for requiring NEPA analysis.
Eg, an activity that constitutes a less than 10% change to current practice is should be categorically excluded.

When a change is made to current practice without performing NEPA; reinstating said change should not require NEPA.
For example: if AUMs on an allotment are suspended; they should excluded from NEPA for reinstatement.

Unless significant changes occur, surveys should not have to be completed multiple times.
For Example: Once an area has had an archeological, paleontological, etc. study conducted future studies should be conducted only if supported by substantial data.

Economic analysis must be conducted and relevant to the community impacted. When an EA in Rio Blanco County includes an economic analysis with Fort Collins, CO included (200 miles away, urban area vs very rural area made up of 75% federal lands, front range of Rocky Mountains vs western slope community), the analysis is useless. At best, we conclude laziness on BLM staff's part to gather local data, at worst we conclude there is a motive for including Fort Collins data that skews the results to benefit the staff's desired outcome.

Develop and adhere to reasonable timelines for completion of NEPA analysis. Five to ten years is an unacceptable time frame and can only be interpreted that some agency staff member does not want to move forward with the project.

BLM should reconsider its position regarding the installation of new power lines underground or converting existing lines from overhead to underground as a possible permit stipulation or mitigation option. Underground power lines have higher cost, reduced reliability, greater ground disturbance during construction and repairs, longer outage periods for customers, and may not always be feasible from engineering and operations perspectives. Underground lines can conflict with cultural resources while mitigating for species like sage-grouse. For more detailed discussion of the environmental and engineering constraints associated with underground power lines (see APLIC website www.aplic.org).

BLM should ensure consistency in access road requirements for permits which would allow access for existing ROW-permit holders to conduct operation and maintenance activities without additional permitting or road closures. Inconsistency in the local field office requirements create challenges in efforts to improve, maintain, and ensure safety, reliability, and operational conditions, through access to existing electric power lines. Access to conduct current ongoing maintenance work in order to improve reliability of the line and also to repair or replace damaged equipment as needed is necessary to ensure safe and reliable operation.

The BLM can build better trust with all stakeholders by ensuring it advances its statutory obligation to allow multiple uses on public lands while protecting natural resources in a timely manner. Balancing these objectives is the very cornerstone of the NEPA process. The process allows all stakeholders to have a voice at the table, provide reasonable public comment and proposes realistic solutions to potential impacts.

Utilize Resource Advisory Councils (RACs) for meaningful input rather than using them as a box to be checked in the process. Follow their guidance if you are going to spend the time and money to convene them. They have not been effective for many years as their input has been brushed aside.

Stay within the law.

Focus on problem solving goals and actions.

Remember to address all stakeholders, not just historically preferred ones.

Any proposed action must consider the entire ecosystem effects. Shortcuts and short term benefits that undermine ecosystem resiliency should be dropped immediately.

Encouraging volunteer efforts means acknowledging during planning processes that people and recreation have an integral right to enjoy pubic land.

More than anything else, changing that paradigm to one of acceptance of public participation will go a long way to help revive the BLM's reputation with stakeholders.

In regards to litigation, the agency must understand that it is a tool used by some organizations to influence land use planning..

It is also an intimidation tactic that has seen a lot of success in recent years and has become an important source of funding for some non-governmental organizations.

Improvements in outreach to stakeholders and members of the community may not stop litigation, but may lessen support for that litigation.

It may take changes to the Endangered Species Act that are above this effort to achieve the goal of reducing litigation but that doesn't mean that BLM efforts to improve outreach and transparency should be abandoned or perceived as ineffective

Given the litigious nature of land use planning it may not be possible to streamline the process any more and retain legally defensible decisions. This really needs to to be asked from legal experts to determine the size of documentation needed for legal defense.

NEPA originally envisioned Environmental Impact Statements to be no more than 300 pages. This practice has long since been abandoned, but perhaps doing smaller, discrete analyses will allow for less voluminous documentation.

Planning efforts should strive to plan consistently across agency boundaries and insure that the goals and objectives of the process match the scope of guidance given. Regional plans should provide regional standards that streamline local planning and not serve as a replacement for local planning.	Provide a presumption that historical usages of an area will continue unless there is a scientifically valid reason to change the usage of the area.	Avoid planning based on decisions or information that has been declined to be applied by partners. ACEC or WCA should not be based on modeled species habitat that was already not utilized by partners.	Do not allow federal lands planning to become a replacement for an Endangered Species listing effort with the US Fish and Wildlife Service	Planning efforts should strive to remain consistent with the scope and objectives of the Process.	Avoid the artificial elevation of small planning issues into large planning issues.	Travel management planning must occur at the most local level possible	BLM recognition of the USFS determination that winter travel is different than summer travel. The Organizations submit that a formal recognition by the BLM of the recent US Forest Service determination that winter over the snow travel and summer travel on federal public lands are significantly different planning issues and often provide different recreational opportunities highlights an opportunity where significant cost savings could be obtained. The Organizations submit that such a determination would further many of the local determinations that have been made as most users are not aware of BLM management of an area for winter recreation as a result of the Service First principals.
		decisions based in scientific and factual information	bringing stakeholders into the process early			utilize science based information for decision making	
		Prepare Supplemental Programmatic Geothermal EIS: BLM should prepare and issue an updated Supplemental Programmatic Geothermal EIS (SPGEIS) for commercial geothermal leasing and development as well as related transmission. To the extent possible, refer to the new SPGEIS as adequate environmental review in order to avoid additional duplicative NEPA exercises. This SPGEIS should be used to establish "Geothermal Energy Zones," regions where geothermal resources are strong, utility-scale development is encouraged and the SGPEIS would be deemed adequate environmental review for at least initial exploration activities.				Establish CX for most Geothermal Casual Use (CU) activities: BLM should declare that CU permits are not needed for most noninvasive geothermal exploration activities. Casual Use is an action on Federal Lands that causes no disturbance. Geothermal developers need a Casual Use permit for many types of early exploration activities, such as aerial surveys with small drones, sampling existing water wells, etc. All federal lands are open to Casual Use by the public with no prior notification, permitting, or approval from DOI. While CU permits are not especially difficult to get, they take 1 month on average. If developers can limit their CU burden, that would represent a real savings.	
		Currently, the Planning Handbook emphasizes documentation of "disputes or controversies" without proper consideration of their factual basis. Developing strong data on recreation will more narrowly define disputes and controversies, leading to a more efficient dispute resolution and planning process. Stakeholders looking to engage in resource development frequently look to an RMP as the final word on recreation in the planning area, and when plan components are based on incomplete information, this situation is likely to lead to unnecessary conflicts because developers may erroneously assume that areas lacking specific documentation concerning their recreational value are unimportant.				Investment in sound, thorough planning efforts with maximum stakeholder input is the most effective way to increase ultimate efficiency. Sound plans will enable more amendments to be developed at an EA rather than EIS level, ensuring that analysis is proportionate to the activity under consideration.	
Do more than pay lip service to the economic and cultural impacts of the proposed action on local communities, landowners, and businesses. Sec. 102 [42 USC § 4332] of NEPA requires that "proposals for legislation and other major Federal actions significantly affecting the quality of the human environment" be analyzed and alternatives considered before being implemented. It was not intended to prevent productive use of resources or protect endangered species at any cost.	Require professional certification, where available, of ID team members for those resource specialists for which appropriate certification programs exists, e.g. range management, forestry, soil scientist, archaeologist, engineers, etc.	Most of the litigation concerns procedural issues, not environmental ones. Federal employees should not have to be lawyers to do their jobs. If you BLM goes to court on the scientific basis for the decisions, you will probably prevail. To reduce frivolous lawsuits designed to delay action those who appeal decisions should be liable for all court expenses if they fail to win the appeal.	Management programs on public lands impact and influence what can or cannot be done on associated private lands. Public land actions affect not only the natural resources of the district but water rights, tax base, and the general welfare of the people. Understand that coordination under FLPMA has been validated several times in our federal courts and that, although perhaps inconvenient, it is the law. Federal laws require local coordination in the planning and management of public lands. Conservation Districts and Counties are the logical entities to coordinate land management plans at the local level.	If BLM will prepare documents that propose actions based on reasonable interpretations of environmental laws and that have scientific and economic merit, local people and honest scientists will help BLM prevail over frivolous lawsuits. A winning record will help discourage appeals.	Cease the practice of Sue and Settle. Once the litigious organizations realize that practice no longer exists, they will stop filing frivolous lawsuits.	More field staff time must be focus on collecting reliable/defensible data to support decision making process and NEPA analysis. This will ultimately lead to less litigation and staff time consumed. Rely more on analysis/information and expertise provided by agency specialist in development of preferred and other alternatives. Many times this information is minimized or overruled by management for reasons that are not supported by any data analysis/scientific information and no supporting rationale.	Reduce the size and scope of NEPA to include only data and analysis specific to the local area and the action being proposed. Many NEPA documents contain extensive reviews of literature or descriptions of the local environment contain material that is either not relevant to the project in question or has been amply covered in previous NEPA analysis and need not be repeated.
Make it easier for states to share data—particularly wildlife management data—with BLM and vice versa. This would include the identification of wildlife migration corridors and other habitat data, and other scientific information that is important to hunters, anglers, and other backcountry recreation enthusiasts.	Tribal governments should be encouraged to participate, and BLM should make special efforts to reach areas that lack access to electronic communications.	Greater collaboration and sharing of ideas, while more time-consuming in the beginning, will result in fewer challenges in the long run and should help avoid delays and lawsuits at the end of the process.	Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well-informed, and providing adequate opportunities for participation should also reduce lawsuits.			Do not encourage shortcuts that may make a plan vulnerable to legal challenge later in the process.	Base plans on the latest information, science, and policy. Acknowledge and include informed public opinion in the overall process. If the science and/or public opinion point to the need for an environmental impact statement, then prepare one.
		•BLM should use designating legislation as the guiding documentation as well as approved BLM policies. For example…Non-discretionary designations made by the Secretary of the Interior, Congress, or the President are not established or amended through the BLM land use planning process. These non-discretionary designations would, however, be identified in a resource management plan, and management direction for the designation, including plan components, would be developed, consistent with the over-arching direction provided in the proclamation, legislation, or order through which the non-discretionary designation was established.	BLM can refer to the language in FLPMA regarding special designations which states that BLM "shall manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans…except… where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law."	BLM currently has multiple manuals in place such as Manuals 6250 and 6280 which guide the administration and management of National Trails.		The NEPA process clearly outlines when the different gradients of analysis can and should be used. We strongly support following the guidelines NEPA outlines. Without setting specific limits on a range of analyses, BLM can define the right amount of analysis to match the scope of decision-making. This scope and scale may be defined geographically as a single field office, more than one field office, or perhaps more than one state. This scale may also be defined by the breadth of issues to be addressed. Programmatic NEPA and the flexibility for defining planning areas in FLPMA and BLM guidance support this approach.	

Utilize collaboration and innovative approaches to balance energy development with BLM's obligation to protect historic and archaeological resource. For example, a collaborative effort among the BLM, the New Mexico SHPO, archaeologists, tribes, and industry in the Permian Basin in New Mexico led to a Programmatic Agreement under Section 106 of the NHPA that has shifted practices away from an ad hoc system of "flag and avoid" for archaeological sites toward a comprehensive program that has greatly improved management of the area's archaeology while providing greater certainty and timeliness for industry.

Perform systematic cultural resource surveys to develop better baseline documentation of historical and cultural resource sites on public lands and their significance. The Federal Land Policy and Management Act, the National Historic Preservation Act (NHPA), the Archeological Resources Protection Act (ARPA), and several Executive and Secretarial Orders require BLM to conduct inventories of cultural resources, yet only about 10 percent of BLM-administered lands have been surveyed. Lack of survey and inadequate data can lead to costly and time-consuming modifications, as well as litigation, when significant cultural resources are identified late in the process or during project development.

Utilize block surveys to identify cultural resources prior to permitting decisions rather than relying on "flag and avoid" surveys later in the process. The BLM should require (not just recommend) the use of block surveys with 40-acre minimums before permits are issued.

As appropriate, use programmatic environmental impact statements in conjunction with programmatic approaches to comply with Section 106 of the National Historic Preservation Act, pursuant to 36 C.F.R. §800.14(b). Doing so provides flexibility and increases efficiency of analysis for individual projects in areas identified as having minimal conflicts with other resource values. The Programmatic Environmental Impact Statement (PEIS) for utility-scale solar energy projects and associated Programmatic Agreement under Section 106 provides an example of sound planning that provides greater certainty for developers while assuring protections for landscapes containing important cultural resources.

Conduct planning at different scales for different kinds of decisions. Many cultural landscapes stretch across state, district, and field office boundaries and often overlap with areas of interest for energy and mineral development. Effective planning should consider indirect and cumulative effects of ground disturbing activities at the field, district, watershed, and landscape levels. BLM should utilize Master Leasing Plans developed through a collaborative process to help guide energy development and avoid and minimize conflicts with cultural and natural resources.

Establish a system for policy guidance development that includes opportunities for public review and comment, including for interim guidance. Extend or update guidance upon expiration so that the status of the direction is clear and implementation is appropriate.

To ensure consistency with the Navel Petroleum Reserves Production Act of 1976, which applies to the National Petroleum Reserve Alaska, and FLPMA, promulgate regulations for integrated activity planning or revise BLM policies to exempt integrated activity plans from regulations and directives that apply to resource management planning, such as wild and scenic river reviews, and directives that implement the Wild Lands Secretarial Order (3310).

At a minimum, exempt Alaska from Wild Lands Secretarial Order 3310, which conflicts with several provisions in ANILCA that apply to BLM wilderness reviews and exceptions to Wilderness Act prohibitions, resulting in BLM multiple use lands being managed more restrictively than designated Wilderness. Reinstate former Interior Secretary Gale Norton's Alaska Wilderness Review Policy, which authorized wilderness reviews in Alaska only when there is broad support by the State and Federal elected officials representing Alaska.

Exempt Alaska from the BLM policy directive to conduct agency-directed wild and scenic river reviews during the RMP planning process, affirming direction in ANILCA that allows only congressionally authorized reviews.

To ensure accurate and consistent interpretation and implementation of ANILCA, work cooperatively with the State of Alaska to develop comprehensive ANILCA regional guidance for Alaska that can be applied to planning efforts and other management actions.

See "Right-sized Planning Areas" and "Travel Management Step-down Plans."

BLM should make early involvement in planning a standard part of agency practice, which would emphasize the value of such engagement as it is likely to result in better alternatives, more opportunities for stakeholders to discuss and resolve major differences early in process, and less risk of appeals and legal actions later in the process. There is good evidence that early and ongoing public engagement can shorten the planning process.

Adhering to science-based decisions, considering ecological as well as economic values, truly balancing responsible development with reasonable conservation, keeping the public well informed, providing adequate opportunities for participation should also reduce legal challenges to agency decisions.

Flexibility in Geographic Scale – improvements should facilitate appropriately scaled plans, including plans for areas that cross state lines or other jurisdictional boundaries. This could reduce problems caused by arbitrary administrative boundaries that do not line up with ecological boundaries. It could also facilitate effective regional or off-site mitigation by enabling agency staff to coordinate more effectively between where the impact is occurring and where mitigation actions take place. In addition, we suggest that the BLM include examples for regional resources such as groundwater aquifers in the planning handbook.

Allow flexibility for BLM managers to broaden planning to the district or multi-field office level as needed to better address cross-boundary issues and simplify the number and complexity of RMPs.

BLM should conform to state and local laws as this is the peoples government.

Including tangible numbers/percentages and triggers for requiring NEPA analysis.

Developing solution alternatives that are the least contentious, while also being the most inclusive of multiple-use objectives.

Including weighted measures during the scoping period for predetermining the scale and size of the item in question. This would simplify further analysis because the size and scope has been predetermined. While also bearing in mind that renewals have been previously vetted and do not require to the fullest extent the NEPA process.

Stakeholder Experts of subject matter should be consulted while determining the greater impacts of a project or action for the purposes of establishing the size and scope.

BLM should require that ID/NEPA team members and resource specialists be professionally certified when appropriate certifications exist (i.e. range management, forestry, soil science). Membership in advocacy or litigious organizations should either be forbidden for BLM personnel, or fully disclosed when they participate in NEPA analysis.

The economic impact of a project should be given in-depth analysis that is inclusive of the long-term economic impacts. Similarly, BLM should publicly recognize the important role that permittees play in partnering to manage and improve public lands. BLM should also conform to State laws. For example, if a State's range law dictates that it is a "fence-out" state, BLM should conform to the fence-out rules. BLM should also strive to work with states by participating fully in preventing and eliminating invasive species.

Litigation opportunities are reduced when procedural requirements are clear. BLM should simply and clarify the procedures for preparing NEPA documents and for complying with the ESA. This should include tangible numbers and trigger points for requiring a NEPA analysis – for example, an activity that constitutes less than a 10 percent change to a current practice may be categorically excluded from a NEPA analysis requirement.

Not all public comments are created equal. Comments from stakeholders with a tangible interest in the land and who experience economic consequences from land use decisions should be assigned more value than comments from those who hold a purely incidental interest in the land. Similarly, in order to prevent frivolous litigation, litigants who unsuccessfully appeal BLM decisions should be liable for court costs and legal fees.

Inconsistencies identified through the coordination process should be included in the Draft EA, the EIS, and et cetera. Currently, this information is placed only in the Final document, if it is published at all. This is too late, ignores the intent of the Coordination Statute, and fails to give stakeholders a meaningful opportunity to comment during the public comment period for the Draft.

Permittees should be included in all communication between BLM, USFWS, and any other involved agencies, regarding the permit or project analysis. Too many times, our producers have been on the losing end of the "finger-pointing game" while BLM claims they're waiting on a USFWS decision, and USFWS claims they're waiting on a BLM decision. This can delay a project for years, and often requires the permittee to file FOIA requests in order to see the communication in question.

Scientific literature or studies that are cited in an EA should be restricted to those specific to the area, ecosystem, or action in question. The number of alternatives considered in an EA should be restricted only to those that are feasible economically and legally. Any alternatives that are contrary to BLM's mandate should not be included.

There should be categorical exclusions for reissuance of permits when no substantial changes have occurred. For routine and accepted actions, such as building a fence, it should be acceptable to limit assessment to adherence to accepted best management practices – these practices already take into account current requirements that archaeology and endangered species be protected. Focus should be placed on environmental and economic costs when there are known issues of concern within that specific planning area.

To build trust, you must be trust worthy. The BLM needs to show the public that it cares and will try to benefit the public. The people need to see that they can rely upon the integrity and justice of the BLM.

A neighbor is one that is situated near another. The BLM needs to have offices near the various places they oversee. They could be regional so that the BLM officers can actually learn to understand an area by living in or close to it.

If the BLM had better communication with the people, there would probably be fewer legal challenges.

The BLM needs to take into account the views of the people and incorporate these views into their policies. By disregarding the people, there will be legal challenges.

It appears that often the BLM follows the dictates of politicians and those out for personal gain rather than protecting the public lands and the things living on these lands. Until the BLM really takes into account the voices of the people and protects our public lands, there will be legal issues.

The BLM needs to listen to the people and understand their viewpoint (s). They should try for a compromise when issues arise.

Communicate and consult with the NEPA.

Share information.

Emphasize and recognize past, present, or potential actions that "avoid" and "minimize" harm, requiring additional "mitigation" from a permittee as a last resort. When it is required, prioritize approval of mitigation that can be undertaken by the permittee, preferably on-site or within a reasonable distance of a permitted activity, rather than defaulting to requiring arbitrary financial payment to a mitigation bank or to fund agency initiatives outside the appropriations process. Take care to ensure that monetary mitigation is not duplicative of fees collected under "cost recovery" and bond programs, while being mindful of fees excised by sister agencies.

In every plan, proactively and meaningfully address access needs to private, state, other federal and non-federal inholdings across BLM-managed lands, including: access guarantees under state-specific legislation (ANCSA, ANILCA), national legislation (RS-2477 rights of way), historic/known routes, transportation/utility corridors, etc. Especially over the last 5-10 years, the theme has been to identify areas where access should be limited due to perceived and marginally supported impact threats. An approach that focuses on access needs instead of barriers, and on verifiable resource issues, is more consistent with the BLM's mandate and will result in better access and fewer impacts.

Re-focus BLM policy and regulations to emphasize multiple use and sustained yield management principles. Policy and implementation should encourage use of the public lands rather than focus on forbidding activities or segregating uses in different times or areas without demonstrated user conflicts. Land use plans should evaluate and address all possible land uses including grazing, locatable and leasable mineral development, logging, natural resource exploration, access, subsistence, infrastructure, agriculture, as well as recreational uses.

Require the BLM use or deferentially consult the states and the U.S. Geological Survey, Department of the Interior's independent science agency, to develop background materials, surveys, and reports prepared on physiography, soils, geology, hydrology, ecology, minerals, hydrocarbons, vegetation, wildlife, and habitat for management plan areas and in the regions of proposed projects requiring permits, leases, or plans of operation.

Preemptively limit legal challenges from inholders and adjacent land owners by narrowing management plan areas to smaller regions consisting primarily (>80%) of BLM managed-lands. Use statutory and regulatory provisions for access as intended. Reduce the scope of plans and policies to reflect only the issues which directly affect BLM-managed lands.

Proactively and respectfully engage adjacent state, local, and private landholders early in the planning process, even before deciding on planning area boundaries, and ensure they are meaningfully consulted at every step of the planning process. There is a considerable loss in trust that stems directly from superficial or condescending engagement in plan development that may require lasting and detailed direction to ensure consultation with affected property owners is duly reverent and effective.

For reviews of proposed actions or development plans, use the minimum analysis necessary and the simplest practicable analysis for the scale of the proposed project. Examine the use or lack of use and the broad availability of Categorical Exclusions. For uses that currently do not fall within a Categorical Exclusion, consider whether season or size limitations might qualify them. Be clear, consistent, and reasonable in applying Categorical Exclusions and in determining whether additional NEPA is required. The Alaska State Office has done a good job with this on a state-specific level, which may be instructive in a national effort.

Raise the threshold for the use of "mitigation" measures. Limit mitigation measures only to proposed actions and activities which cannot "avoid" and "minimize" and which would result in major or significant losses or impacts. Clearly define the level of impacts and "losses" that require mitigation measures.

Reframe the permit submittal and review process to be a cooperative discussion between the applicant and the BLM. The permit process should focus on agreeing on the conditions and circumstances under which a member of the public can operate on the public lands, not an antagonistic dictate of regulations and stipulations intended to preclude public use.

Facilitate a purposeful return and renewed fidelity to multiple use and sustained yield mandates. Focus in recent years has been heavily in favor of preservation and protective status based on arguable and largely anecdotal threats to area resources. For example, the solicitation of ACEC nominations early in the Central Yukon Resource Management Plan process resulted in over 50 nominations covering over 35% of the planning area. The majority of proposals appear to be moving forward, even though the detailed resource inventories, data reviews, and other analyses inherent in the planning process have not been completed or made available for review.

Respect the Governor's Consistency Review process as a substantive consultation with a sovereign entity, with constitutional and statutory obligations of its own, and provide duly robust and detailed responses to any perceived disagreements.

Establish in regulation, or via the CEQ, or work with Congress to craft statutory amendments that require all federal processes related to a single proposal or application be performed concurrently to the extent practicable. Procedures pursuant to authorities under the Endangered Species Act, Marine Mammal Protection Act, National Historic Preservation Act, Clean Water Act, Clean Air Act, and many others (e.g. 404 permits, biological opinions, ambient air monitoring) should proceed simultaneously and in an order which provides the shortest time route to completion of the entire project review. .

Require agencies participating in permit evaluation to share data, background materials, preliminary conclusions, etc., in order to prevent duplication of effort and provide timely and defensible resolution of permit requests

Require all BLM resource management plans, land use plans, permits and regulations clearly list which laws provide statutory authority and for which provisions, describing how the action taken is required to satisfy noted obligations responsibly and with the least effective burden on the regulated public.

All existing and proposed ACECs should be reviewed by an independent panel external to BLM, such as an expert or academic advisory board, for consistency and verification of the "relevance" and "significance" criteria used to justify designation. Such a panel should include expertise in geology, natural hazards, hydrology, botany, fish and wildlife, and other specialties indicated by eligibility criteria, as well as at least one representative with a keen understanding of the area at issue.

There is noticeable inconsistency in the resources considered and acreage set aside to "protect" identified resources (e.g., a few sq. kilometers to tens of thousands, based on similar or identical justification). A state-by-state and nationwide review should rigorously define the meaning of ""relevant" and "significant," limiting application of the criteria to only those areas of "critical" concern, and recommend ACECs no longer in need of designation.

Require nomination periods for ACECs and similar land use designations include the ability to nominate existing areas which can be considerably reduced in size or eliminated.

Private citizens must sign non-collusion affidavits when working on FACA and other state and local committees and commissions, with penalties. Federal and state employees should be held to the same standards.

Recognize that some organizations are going to appeal no matter what BLM does. Stop trying to placate them. Build good documents even though they will be appealed. If they are good enough, BLM will prevail and set precedent that reduces the long-term total of appeals.

Create a culture within BLM offices that encourages BLM employees to work to on building successful relationships with stakeholders and working out solutions that reduce NEPA and avoid appeals. Build a culture that discourages employees from feeling disenfranchised to the point that they work closely with litigious groups. If employees feel that their only way to be heard is to help with groups appeal the documents they worked on, there will be a continuous loop of litigation and frustration. Build a culture that rewards good actions and severely punishes employees that financially benefit from appeals against BLM.

Create good land use plans that cover most site-specific actions. The best way to avoid a lot of appeals of small projects is to cover the small project NEPA requirements with large NEPA documents. Few NEPA documents means fewer appeals.

Better land use plans will reduce the number of small project EAs. Better big documents will reduce the number of NEPA documents. The "right size" question may be answered by working towards the "right number".

BLM should also start a dialogue about how best to plan and work across jurisdictions that meet the other agency needs. Examples include watershed and forest health, enhancement of water quantity and quality for community use, development of economic opportunities within the area, etc.

One of the key challenges that communities and landowners face in engaging with the federal agencies is the high rate of personnel turnover. Providing "advance in place" options and requiring the use of hand-over memos to document community engagement, collaboration and findings could help to alleviate this challenge.

As we highlighted in the first question, doing analysis thoroughly the first time can avoid litigation, delays and costs in the long run. It is also critical to monitor the implementation of RMPs and/or programmatic documents and adapt and make adjustments as needed along the way.

In addition, true collaboration can dramatically reduce litigation. The agency should conduct a thorough review of known collaborative planning and NEPA efforts that have resulted in resolving difficult resource issues, competing uses, etc. It should then produce a report on what the results are and why the efforts were successful in precluding litigation or reducing litigation.

Numerous collaboration studies have been conducted that highlight what is necessary for successful collaboration. Much of this is built upon trust, relationship building, buy in, etc. This is not a fast and efficient process but once developed will streamline future efforts, particularly at the local level, and reduce litigation risks

BLM should explore the use of alternative dispute resolution vs. automatically deferring to the court system. Best approaches that other agencies and organizations are using should be researched and explored before deciding the best process to be used.

If BLM has current RMP's and programmatic documents that have been thoroughly and rigorously analyzed they also have built a foundation from which subsequent NEPA processes can be streamlined. This can take multiple forms but without that foundation the agency will never be successful in implementing a streamlined approach as it will be successfully challenged by the public and courts.

This will be particularly critical in land health restoration activities. If public lands are not healthy and as a result, prone to disease infestation, invasion of monocultures of non-natives, severe fires, severe soil loss, deterioration of community water quality and quantity, etc. then the management activities associated with restoring land health should be the primary focus and concern.

Planning area leaders should attend local county commission meetings at least monthly if not more frequently, and go to lunch with them.

Shorten the time needed to process project requests including APDs. And every and now and then admit when you're wrong. County commissioners would fall down faint and then get up and trust you more.

Reform EAJA in a major way. This is the engine that drives most litigation: the hoped for pot of gold through an EAJA payout. Also consider giving local government EAJA rights to recover attorney fees when they prevail in litigation with a federal agency, and/or recover against an NGO who files a frivolous action.

Get legislative help to set clear objective bench marks of what constitutes a valid EA, FONSI, and EIS with its sub-documents like Scoping report, Range of alternatives, and impacts analysis.

Overhaul the IBLA and Administrative appeals process, to greatly shorten the process. Purge the DOI of the many ALJs who are in the tank for the enviro NGOs.

See prior responses. Get legislative support for objective markers on all NEPA docs in terms of page length, and certain criteria.

Use local people to speak for you

INVOLVE the communities --

pre-test your ideas

be on site to speak to local people

provide as many alternatives as possible

Ask a scientist

request QUESTIONS & COMMENTS