



Streamlining, BLM\_WO <blm\_wo\_streamlining@blm.gov>

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## Fwd: Thanks re: FYI - My suggestions re: BLM Requests Input for Future Planning Efforts and Environmental Reviews - July 24th deadline

1 message

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**Hamedani, Fariba** <fhamedani@blm.gov>  
To: BLM\_WO Streamlining <blm\_wo\_streamlining@blm.gov>

Thu, Jul 20, 2017 at 5:18 PM

Fariba Hamedani  
Planning & Environmental Analyst  
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----- Forwarded message -----

From: **Favour, Nancy** <nfavour@blm.gov>  
Date: Thu, Jul 20, 2017 at 3:36 PM  
Subject: Fwd: Thanks re: FYI - My suggestions re: BLM Requests Input for Future Planning Efforts and Environmental Reviews - July 24th deadline  
To: Fariba Hamedani <fhamedani@blm.gov>  
Cc: "Neckels, Jacqueline" <jneckels@blm.gov>, Leah Baker <lbaker@blm.gov>, "Humphrey, Catherine" <chumphre@blm.gov>

Hi Fariba,

Richard Spotts, a former BLM P&EC for ~20 years at Arizona Strip District Office, shared these. He said he submitted them through the Google form but that there was a 700-character limit. So, just fyi.

regards,  
Nancy

----- Forwarded message -----

From: **Richard Spotts** (b) (6)  
Date: Thu, Jul 20, 2017 at 11:48 AM  
Subject: Thanks re: FYI - My suggestions re: BLM Requests Input for Future Planning Efforts and Environmental Reviews - July 24th deadline  
To: "Favour, Nancy" <nfavour@blm.gov>

Hi Nancy,

Thanks for your positive response.

Yes, I pasted in each of my suggestions and submitted them this morning through the official BLM web site. However, when pasting them in, I discovered that there is a 700 character limit for each comment box and that the last comment box at the end may not operate effectively. In any case, I did my best to officially submit my suggestions and I hope that they were properly received and that they will get serious consideration.

In addition, if it would be appropriate and you wish to do so, please feel free to forward my FYI email to any of your relevant WO and ASO NEPA contacts. I lost virtually all of these BLM contact email addresses when I left BLM to retire, including Jackie's, Leah's, and Cathy Humphrey's.

I am well and greatly enjoying retirement. I hope that you are well too.

Thanks again!

Richard

On Thu, Jul 20, 2017 at 11:47 AM, Favour, Nancy <[nfavour@blm.gov](mailto:nfavour@blm.gov)> wrote:

Hi Richard,

Thanks for sharing your suggestions. Did you submit these through the Google form as well? I know the WO has a very short turnaround time to parse the public comments so I doubt they will consider anything that isn't submitted through the Google site.

Hope you are well!

Nancy

On Thu, Jul 20, 2017 at 10:29 AM, Richard Spotts (b) (6) wrote:

FYI - If you have not already seen it, you may find the BLM email requesting public input by July 24th forwarded immediately below of interest. **My suggestions in response to this request are provided further below, using the letter and number format of the BLM response web site.**

I strongly support BLM's planning and NEPA processes. I greatly fear that the current Trump administration, in concert with the Republican-controlled Congress, will likely try to eviscerate these processes to serve short-term, narrow corporate interests at the expense of the long-term, broader public interest. The recent repeal of BLM's new Planning 2.0 regulations was the first success in this shameful assault.

As a recently retired BLM Planning and Environmental Coordinator (Arizona Strip District Office), with nearly fifteen years of BLM NEPA experience, I felt compelled to respond to this request for input. Despite the current political situation, I know that there are many positive opportunities to improve BLM's planning and NEPA processes to make them more honest, meaningful, efficient, and effective, without undermining their fundamental purposes. Whether you agree with my suggestions below or not, I encourage others to respond to this BLM request for input by next Monday's deadline. Thanks for your consideration. RS

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----- Forwarded message -----

From: **Streamlining, BLM\_WO** <[blm\\_wo\\_streamlining@blm.gov](mailto:blm_wo_streamlining@blm.gov)>

Date: Mon, Jul 3, 2017 at 12:33 PM

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

To: BLM\_WO Streamlining <[blm\\_wo\\_streamlining@blm.gov](mailto:blm_wo_streamlining@blm.gov)>

I write to you today to ask for your ideas.

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

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

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

We are opening a 21-day period, beginning on July 3, 2017 and ending on July 24, 2017, in which you can submit your ideas specific to how we can make the BLM's planning procedures and environmental reviews timelier and less costly, as well as responsive to local needs. This streamlining effort will help shape how we move forward. You can submit your input by going to this link: [goo.gl/CYxqM5](http://goo.gl/CYxqM5).

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

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

We look forward to hearing from you.

Sincerely,

Michael Nedd

Acting BLM Director

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**My suggestions:**

**A. Focused Analysis:**

1. BLM should proactively work with CEQ to expand the list of available NEPA categorical exclusions (CXs) for small-scale projects, such as localized erosion control, noxious weed control, and fuel reduction projects (especially in wildland-urban interface areas). Without these CXs, BLM staff may avoid pursuing worthwhile small-scale projects due to the time and effort required to do EAs..
2. BLM should make much better use of programmatic EAs especially for foreseeably repetitive proposed actions over large spatial areas, such as landscape treatments and recreational SRPs. Subsequent applications could then be handled through tiered, supplemental EAs or DNAs.
3. BLM should make much better use of GIS data layers in preparing NEPA documents and determining which resources or issues may be present or affected by specific proposed actions.
4. BLM staff should know what completed NEPA documents already exist before preparing new ones. There are many pre-ePlanning completed NEPA documents that may be relevant but overlooked when new proposed actions are considered, and staff turnover in offices makes this an ongoing problem. Project leads should research and know all completed NEPA documents by their office relating to their program area.

5. BLM should put much less emphasis on "negative" analysis in NEPA documents, meaning extensive explanations of why specific resources or issues are not present or would not be affected by the proposed action. Of course, if the public claims that a resource or issue should have been carried forward for analysis, then BLM must accurately respond to that claim before finalizing the NEPA analysis.

#### **B. User-Friendly Planning:**

1. BLM should clearly identify initial "drivers" when starting a RMP revision process, and recognize that the existing RMP is the foundation upon which to build the new RMP. "Drivers" would include new issues, resources, or scientific findings that arose after the existing RMP was adopted. RMP revisions should not be de novo efforts to "reinvent the wheel".

2. BLM should begin each RMP revision process with extensive public workshops where detailed GIS maps are available for review, along with explanations of the "drivers" and requests for detailed public input on both the maps and "drivers."

3. BLM's requirement for formal RMP evaluations every five years is inflexible and often wasteful. These evaluations should instead occur when there is sufficient cause for them, and recognizing that plan maintenance actions may occur at any time. It would be more prudent to focus limited staff time on keeping to RMP revisions every fifteen years rather than slavishly following an every-five-years RMP evaluation requirement.

#### **C. Transparency:**

1. BLM must establish and consistently follow a national policy for how each office will create, maintain, and use its NEPA and RMP revision mailing lists. There are now discrepancies among and within the states about how these lists are created, maintained, and used. These discrepancies undermine BLM's credibility and NEPA's purpose of encouraging transparency and public involvement.

2. BLM must continue to improve ePlanning to make it as user-friendly as possible. For example, the geographic locations now are points only and often highly inaccurate. Like in GIS, NEPA project leads should be able to identify points, lines, or polygons as locations of proposed actions. More accurate geographic locations would benefit both the public and BLMers searching for NEPA projects in specific areas.

3. During scoping for EAs and EISs, BLM should schedule and effectively publicize field trips (including on weekends so working folks could attend) to the proposed action areas. These field trips would provide valuable opportunities to encourage dialogue among stakeholders and identify issues of concern early on. In contrast, BLM's current practice of drab "open house" workshops tends to be diffuse and low-key, where little practical dialogue or relationship building occurs. BLM should strive to meaningfully engage the public early on and at relevant locations, rather than look for ways to keep the public restrained, sedated, and at bay.

4. BLM should use the annual EPAP evaluation process to hold managers and employees accountable for effective performance on their priority NEPA projects. NEPA deadlines are often missed or extended without persuasive reasons. BLM managers often fail to properly manage the NEPA workload as they are distracted by other ever-changing and never-ending bureaucratic priorities.

#### **D. Being Good Neighbors:**

1. BLM should more effectively "front load" the scoping process to encourage greater public awareness and involvement. For example, BLM should go beyond sending the normal scoping letters and emails, and be proactive and creative about using news events, social media, and other communication methods. Journalists should be invited to participate in relevant field trips and public meetings.
2. BLM managers, planners, and project leads should be more active in getting out of their offices to meet with local leaders, service clubs, church groups, garden clubs, etc. You can't be a good neighbor if you don't meet your neighbors.
3. 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.

#### **E. Reducing Litigation:**

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. 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. Indeed, there may be a hiatus of many years before utilization or key areas were monitored. 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.
3. 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.

#### **F. Right-sized Environmental Analysis:**

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.

I hope that my suggestions are helpful. Thanks for your consideration.

Richard Spotts

Saint George Utah

(b) (6)

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