

Questions and Answers for Time Sensitive Plans and the Current Bureau Planning Effort

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1. Why are the planning efforts of such importance that they seem to be receiving more than usual attention at the national level?

The ability to accomplish Bureau and national goals in the management of public lands and resources is a high priority to the Department. Land use plans and planning decisions are the basis for every action the Bureau of Land Management takes and serves as its primary tool for providing the public a voice in BLM's land and resource management programs. Without adequate and up to date plans, the BLM's planning decisions can neither ensure the integrity and sustainability of the lands nor assure their use and enjoyment by the public in an environment of increasing legal and public scrutiny.

The inadequacy of the BLM's aging and outdated land use plans and NEPA documents has left the Bureau ill-prepared to address areas with vulnerable, sensitive or at-risk resource values and increasingly exposed to litigation. Many of the BLM's land use plans and associated NEPA documents do not address critical habitats for threatened or endangered species or noxious weed invasions revealed in recent science and resource assessments, nor do they address new or amended legal mandates, such as those providing new point source water quality standards. The effects of these deficiencies are also being felt in BLM's energy and minerals programs that make a significant contribution to the Nation's critical needs for coal and oil and gas, while providing the States and the U.S. Treasury with over one billion dollars annually in royalties, rentals and bonus payments.

On a broader scale, the unprecedented expansion of urban areas, urban encroachment into previously rural areas, and the wildland-urban interface have resulted from dramatic demographics changes in the western U.S. These changes have led to conflicting land uses and cultural values as well as increased risk to humans and public property from natural events, such as fire, that were not anticipated or addressed in the BLM's aging plans. Most plans were developed with the intent to guide management for a 10 to 15 year period, and did not forecast the dramatic and accelerated changes occurring in the West. Clearly, what is needed are updated plans that are adaptable to changing conditions and demands.

The ability of the BLM to implement critical on-the-ground programs is increasingly limited. In addition, the time sensitive plans are of great significance because they are critical to fulfilling Bureau priorities, resolving nationally significant legal issues and /or addressing critical resource conflicts. In recognition of the need for sustainable and defensible land use plans, Congress appropriated funds for the BLM to update its plans. In FY 2001 and beyond, Congress, the Office of Management and Budget and the Department have high expectations of the Bureau; our request for funding has been approved and now it's time to deliver. The challenge to update so many plans in a relatively short time will strain the Bureau's resources. However, there is an expectation

on the part of Congress that the work will be accomplished in a timely manner.

Another reason for the focus on the planning effort at this time is the Bureau's emphasis on collaborative planning. BLM's relationship with the local public and interest groups in the future will be greatly influenced by the degree of success of these new collaborative planning efforts. The efficiency demanded of the planning process to complete time sensitive plans on schedule provides an opportunity in which field offices can avoid extended and drawn out planning processes that cause much of the general public to drop out through attrition. In addition, the efficiency demanded of the planning process in this effort will ensure that BLM staff is not tied up in planning work for years and that they will be able to engage in on-the-ground work of public lands and resources which brings so much satisfaction.

2. What is the context of my local planning effort in relation to other planning efforts in the Bureau?

The Bureau provided a report to Congress in February 2000 describing both short and long term needs to address BLM's 162 land use plans. In the short term, 2001, funds were requested to address the highest priority needs demanding immediate attention. The BLM committed to: 1.) address oil and gas issues in AK, UT, CO, WY, NM, and MT; 2.) have plans in place for 12 monuments or National Conservation Areas; 3.) Prepare plans for 6 military ranges; and 4.) prepare 11 RMPs and replace old MFPs. There are approximately 14 time sensitive planning efforts which need to be completed within two years. The challenges facing the Bureau include meeting commitments to Congress, supporting time sensitive plans, and ensuring that the field has adequate training, budget support, and guidance to succeed.

Action is currently underway to address all of these challenges including providing training, securing budget increases, increasing staffing for critical needs, developing and reviewing pre-plan analyses, providing supplementary guidance, establishment of the National Planning Support Team, and other efforts. Part of the current actions being taken is a series of meetings which are bringing together planners, managers and other disciplines from across the country to share information, experience and ideas regarding the planning challenges before the Bureau. The meetings are meant to be part of a process to move from issue identification to issue resolution. One of the objectives of the meetings is to enhance the participants understanding of what is at stake in this unprecedented planning effort such as national and local implications for the management of public lands, relationships with the public and Congress, and the historic nature of this planning effort. Although there is sensitivity to the burden these meetings have on very full schedules, they are being held because they provide valuable opportunities for communication and the collective sharing of tools, mechanics and experience related to planning, and help to build the broad support and network for managers and teams to

complete sustainable plans within budget and on schedule.

Coordination and Review

3. There are many planning efforts currently underway or starting throughout the Bureau. What are some considerations of appropriate consistency between the various plans and how will the consistency be achieved?

Planning efforts will need to have an appropriate level of consistency if the completed plans are to be sustainable. Overall consistency will be achieved through adherence to existing planning and NEPA regulations, handbooks, guidance and policy. Additionally, coordination regarding analysis and resource decisions must occur across administrative boundaries and planning area boundaries. Analysis and analytical assumptions, decisions regarding what constitutes reasonable levels of needed information, and resource decisions will logically vary with unique circumstances and conditions, and physiographic and vegetative differences. However, planning assumptions, analysis, decisions regarding needed information and uncertainty, resource objectives and resource decisions should not substantially vary between planning areas or administrative units if not warranted by on-the-ground differences.

The consistency between planning efforts that are needed to create sustainable plans will be accomplished through the National Planning Support Team, and State Office and Field Office coordination groups and leaders. Consistency will also be obtained by grouping planning efforts where appropriate. An important factor in obtaining consistency will be the ability and motivation of individual team leaders, field managers, Deputy State Directors and others to take initiative and responsibility for the dialogue, networking and coordination that is so necessary for success in achieving appropriate consistency.

4. What is the National Planning Support Team and what is its role and responsibility?

The National Planning Support Team (NPST) will be established in the Washington Office to facilitate completion of time sensitive plans within two years. The State Directors retain authority and responsibility for completing plans, but the NPST will work to reduce barriers and provide support needed by states and field offices to complete plans on schedule, coordinate with national level interest groups and coordinate at the national level with the Department, Congress and other agencies. Other tasks will include facilitating development or clarification of guidance or policy on regional or national issues, ensuring appropriate consistency in land use plans, identifying planning and NEPA efficiencies and other tasks that will aid the completion of the plans. The National Planning Support Team will focus on time sensitive plans but the results of their work is

expected to be applicable to other planning efforts.

The NPST will serve in an interdisciplinary manner and members will be assembled from several Groups and Directorates depending on the nature of the issues. The NPST will also include representatives from affected field offices or states. The NPST will be led by a project manager who will serve as BLM's primary point of contact to ensure coordination with the Department, Congress, media, and other agencies regarding time sensitive plans.

5. How will the Washington Office monitor or review the progress of the time sensitive plans?

The Washington Office will conduct reviews of time sensitive plans according to an established schedule in order to facilitate completion of the plans. The purpose of the reviews will be to ensure appropriate levels of consistency with laws, regulations, policy, the planning handbook and other guidance. The ultimate goal is sustainable land use plans completed on schedule which support implementing BLM's resource goals. The National Planning Support Team will work with the Department to establish Departmental review requirements that are as compatible as possible with the Washington Office review.

Review will occur at five stages: Pre-plan, Notice of Intent, Planning Criteria, Notice of Availability for Draft Plan/Draft EIS, and Notice of Availability for Proposed Plan/Final EIS. Each review level will examine specific checklist items and criteria and may require a briefing paper prepared by the field that summarizes key components and responds to anticipated questions by the Department, and Congress.

Streamlining

6. What are some of the important considerations and steps that might be taken to streamline the planning process?

The foremost consideration to ensure sustainable land use planning is to assure that all legally required planning and NEPA steps are followed. Within the existing legally required process there are steps that can be taken to achieve efficiencies in the administration of the planning process. The following suggestions are just a highlight list of some of the tools and approaches used by BLM offices which have proven helpful.

Group planning starts on the basis of similar resources, issues and geographic area. Grouping would be to obtain efficiencies in public interaction, analysis, staff work, decision making, etc.

Establish coordination groups and individuals at the Field Office, State Office and Washington Office as appropriate. Coordination groups are valuable in that they facilitate processes such as communication, resolution of issues, participation by the Solicitor's Office, etc.

Manage the planning process to avoid losing time by the inordinate need to redo analysis and writing and the inordinate reconsideration of agreements and decisions. To help accomplish this, all involved should receive orientation regarding the planning process and planning requirements for analysis and writing, and should enter into firm agreements regarding process and schedule.

Other tools and approaches for consideration include the use of contracting, early identification of personnel needs, and the early establishment of administrative record rules and processes.

The discussion of tools for efficiency cannot be in-depth and thorough enough here to be of ultimate utility. However, each office that is involved in planning, regardless of the local level of experience, should develop an on-going broad and diverse network of contacts including use of the National Planning Support Team to obtain as many ideas and as much information as possible for efficient planning. In addition, for the planning process to succeed, especially for time sensitive plans to meet their schedule, team leaders, field managers, Deputy State Directors and others managing the process will need to be fully engaged, and to take initiative to identify problems and suggest solutions.

Communication

7. How will the challenging task of communicating with so many groups at so many levels during the planning process be accomplished?

The time sensitive plans are of such significance to the Bureau that an increased level of coordination and consultation with members of the public, local and national interest groups, state governments, Congress and others is warranted. A communication plan will be established using a tiered approach from the field to the state and national levels. Field Offices should develop a locally focused communication plan that identifies key stakeholders and establishes an outreach schedule. This document should accommodate a two year schedule for plan completion and should include strategies beyond formal

scoping, public meetings and comment periods to communicate with local communities, interest groups, Advisory Councils and RACs. State Offices should develop a communication plan that is geared towards governors, elected officials and interest groups. The Washington Office will develop a communication plan for Congress, the national media and national stakeholders for implementation by the National Planning Support Team. Together, these three communications plans will provide a comprehensive approach for engaging a wide range of stakeholders and ensuring that each plan is developed in keeping with the Department's priorities of cooperation, coordination, and collaboration.

Efficiency and Process

8. With the exception of occasional high profile, well financed plans that are of high priority to Congress or the Administration, Resource Management Plans have rarely been completed in a short amount of time (two years). Why is it reasonable to expect that so many plans in so many diverse areas across the western states can be completed in such a manner?

A substantial part of the answer to this question lies in the ability and motivation of managers, planners and all involved to energetically manage the planning process. Each stage of the process must happen efficiently. Public involvement, collaboration, data and information gathering, analysis, staff work, and decision making all need to be a priority for managers. Without energetic management, the process itself can steer and control while key players become something of a spectator to the planning effort.

Management of process means that all involved need to be true to the process. In other words to make and to keep contracts or agreements of behavior, such as to submit required staff work on schedule, to conclude issues, discussions and questions at the agreed upon time or moment, to take responsibility so that circular or repetitive discussions do not occur, that decisions are not made and then remade and then made again. Such inefficiencies often appear to be only a day or week here and there, but in reality time savings throughout the RMP process are usually gained or lost in small increments.

A second part of the answer lies in the training of those involved in the planning process. An efficient planning process would rely more on the active transfer of planning

knowledge and experience to those involved and depend less on “learn as you go”. The idea would be to avoid missteps that are costly in time and budget.

9. Aren't we likely to make matters worse if we try to fast track the process? What if neither side is willing to be shortcut?

No fast track process can include the “shortcut” or omission of required planning and NEPA steps. A defensible planning and NEPA process is one which has followed all legal requirements. The challenge is to conduct an efficient planning process in which collaboration occurs and interested parties have full opportunity for involvement. Part of the challenge in a collaborative process will be to share and gain acceptance to the extent possible of the need for efficiency in our planning process.

10. The planning and collaborative process seems to empower disagreement rather than movement towards resolution. How do we avoid endless process and gridlock?

There are concerns that collaboration takes time which might preclude completion of plans on schedule. The issues faced by BLM decision makers are complex, controversial and sensitive. However, bringing important natural resource issues to resolution in a timely manner, through a reasonable process, with well-informed participants, is in the best interest of the BLM, interested parties, communities as well as the natural resources.

Once information from the BLM, agencies, interested parties and the general public is shared and discussed, then a fair and sensible collaborative process would provide that a choice must be made. The responsible official cannot delegate his or her decision making responsibility. All involved in the planning process need to understand the requirement for the responsible official to make a determination and that the process must ultimately conclude in decisions being made. The careful management of a well defined, realistic, open and fair collaborative process will gain as much support as possible for planning decisions but cannot guarantee the support of all.

11. How do you avoid the kinds of missteps that can consume so much time when doing work such as analyzing and describing environmental consequences?

One of the things that has sometimes consumed inordinate amounts of time in building plans and doing related environmental impact statements is analysis and effects writing. In order to develop an effective first draft it is necessary to coordinate with specialists and writers early in the process. Up front discussions can point out how to avoid professional editorials, opinions, poorly supported conclusions or unsupported conclusions. Those involved in analysis and effects writing need to have a clear understanding of how sustainable decisions are based on a pyramid which has as its base a foundation of facts and evidence, which underlie analysis and logic, which underlie

basic conclusions by specialists, which underlie ultimate conclusions, decisions, findings and determinations by the responsible official.

Information and Data Needs, Adequacy of Information for Decisions and Risk

12. How do we constrain our tendency to protect ourselves by collecting every possible piece of data and sorting it later? How do we avoid being far along in the planning process only to discover additional information is needed to support a decision and therefore creating the need for a substantive delay?

This can best be accomplished by a rigorous examination of the planning issues and the careful development of planning questions early in the process to provide a basis for clearly defining information needs. A solid understanding of the questions to be addressed and the specific information, criteria and thresholds upon which decisions will be based is necessary to avoid unanticipated needs for additional information. A poorly focused collection of information no matter how broad and extensive cannot substitute for the early-on and rigorous process by which information needs are directly related to specific planning questions and associated criteria and thresholds.

The process by which information needs are assessed must involve interaction between the program lead, planning team lead, and manager or responsible official and interaction between the Field Office, State Office and Washington Office. Those involved at the various levels will work together to identify needed information, assess the availability, and time and cost associated with obtaining information, work together resolve conflicts, and initiate a plan to acquire additional information if the screening process confirms additional data needs.

In addition, information and analysis must be at the appropriate scale for the decision being made. The site specific, detailed information which is needed for project level decisions is not appropriate for broad landscape RMP level decisions. A specific example would be the determination whether a complete third order soil survey would be necessary for a new resource management plan. The fundamental screening to data or information needs would be applied: what is the specific planning question being posed, how will it be addressed and what specific information, criteria and thresholds will be used to make a reasonably informed decision. In this case, if the answer included criteria and thresholds related specifically to a third order soil survey, then the information would either need to be obtained, or alternatives to the decision, such as deferral or staging, would be considered. If the soils information did not meet this screen, then this information gathering should not be part of the land use planning process.

13. It is not clear what is meant by the requirement to have criteria and thresholds upon which decisions will be based?

When working on a plan or environmental impact statement, detailed analysis and detailed data are sometimes weighed intuitively in making judgements as to what the information means and how it is used in making decisions. In other words, we collect the information first and then decide what it means and how it will be used afterwards. Prior to analysis and data collection, the planning team should know what management decision is to be made and what are the specific criteria or thresholds which will determine whether one option is selected over another or which will determine whether the decision is affirmative or negative or whether mitigation is needed.

14. How can we establish a set of criteria for recreation and access values that can be balanced against other resource needs?

Planning guidance requires the establishment of resource objectives which are in many cases defined in broad terms. The establishment in the planning process of resource condition objectives or desired future conditions will create the framework for balanced decisions. Management discretion or “decision space” exists for balancing multiple uses under those scenarios in which the resource objectives would be met. Members of the public or interested parties may be advocates for certain resources or programs and define “resource needs” in a variety of ways. For planning purposes “resource needs” are met when associated legal requirements, BLM guidance, and the Resource Management Plan objectives are met for the particular resource. Planning regulations require the development of planning criteria to guide the development of the RMP, to ensure the RMP is tailored to identified issues and to ensure that unnecessary data collection and analyses are avoided. However, the establishment of program specific “criteria” for balancing programs and resource needs is not a planning step.

15. Interested parties are quite concerned with the level of our inventory efforts and may oppose any planning effort that they believe does not suspend planning until detailed inventories are undertaken. How can the planning process address this situation?

The planning and NEPA processes (ensuring legally required steps are completed) provide facts, evidence, analysis and logic in the record sufficient to support reasonably informed decisions. The standard for the adequacy of inventory or information is one of sufficiency to support reasonably informed decisions. If decisions are not based on reasonable information, the decision may be termed arbitrary and capricious. Exhaustive collection of information is not necessary to assure reasonably informed decisions.

For example, highly detailed information may not be available for decisions regarding off highway vehicle designations, or information may not be recent regarding wilderness inventory. In addressing whether additional information is necessary for planning decisions, the question posed is when this information “essential to a reasoned choice among alternatives” (40 CFR 1502.22[a]). If it is not likely that additional information would substantively alter the assumptions, the understanding of basic relationships, and the analysis upon which the decision is based, then although the new information would be welcome, it is not necessary for a reasoned decision.

16. Must BLM consider information provided by interest groups and stakeholders in the land use planning process.

All information must be carefully reviewed and evaluated to determine if it is appropriate for consideration or analysis in the planning process. The standard which is applied to all information, regardless of source to determine if it must be considered in the planning process is whether or not the information would alter assumptions and analysis such that substantively different conclusions would be reached.

17. The standard for information sufficiency or adequacy is one which will support reasonably informed decisions. This implies that almost all planning decisions will be made in the context of some level of uncertainty and incomplete information, therefore involving some level of risk. What level of risk is acceptable in plan decisions?

There is no single definitive answer to what level of risk is acceptable in planning decisions. Risk associated with planning questions can generally be assigned to two broad areas: whether or not the resource objectives will be achieved, and whether or not the decision will be legally defensible. These two broad areas are related. In general, as more information reduces uncertainty, the ability to manage exposure to risk is reduced.

A determination regarding the acceptable (reasonable) level of risk and uncertainty or incomplete information must be related to the scope and sensitivity of the decision. For example, a decision regarding the management of a ten acre area that contains the only known population of a plant species would have limited scope but very high sensitivity. Another decision regarding a prescription for range management might not be highly sensitive but could be very large in scope involving millions of acres. Although there is no definitive answer regarding acceptable risk in planning decisions, the standard is always one of reasonableness. Acceptable risk and acceptable levels of uncertainty and incomplete information varies with the scope and sensitivity of the resource decision. In addition to the scope and sensitivity of the resource decision, the cost and time associated with obtaining further information is also a factor when considering the reasonableness of a decision. Planning decisions may acknowledge uncertainty and incomplete information and establish a monitoring program that will specifically address the area of uncertainty

and assess whether or not resource objectives are being met. Such a strategy would define what specific criteria and thresholds would trigger an adaptive management change to the decision.

Risk associated with whether or not a planning decision can be sustained if challenged is partly dependent on whether the test of reasonableness has been met, as discussed above. In certain respects, making planning decisions that are legally defensible is a more straightforward task than assuring the achievement of resource objectives. Keys to creating a sustainable decision are to follow all required planning and NEPA steps and procedures; provide in the record the facts, evidence, analysis, and logic upon which the planning decision is based; assure that pertinent information is not ignored; and finally meet the test of a reasonably informed decision by weighing the scope and sensitivity of what is involved in the decision against how much uncertainty exists and the cost and time associated with obtaining further information.

18. Even if the information needed to support reasonably informed decisions has been identified, would it not make sense to gain even more information since additional information would reduce uncertainty and therefore ease controversy and aid decision making?

There may be situations in which additional information may indeed greatly aid decision making and reduce controversy. However, in some instances, additional information becomes increasingly costly to obtain while the degree to which uncertainty is resolved is incremental. Large amounts of information regarding certain resources and related decisions may indeed have little effect on controversy and often may do little to reduce uncertainty and clarify decision making. Information gathering and analysis can not only be time consuming and expensive, but if not carefully focused it can have the unintentional result of either not helping or perhaps even obscuring issues and decisions.

There must be adequate information and analysis to support reasonably informed decisions. The amount of information appropriate for any given management decision will vary with the scope and sensitivity of the decision. The time, cost and effort needed to acquire additional information are factors in determining whether the information is reasonable to obtain. More is sometimes not only expensive and time consuming, more is sometimes only marginally better.

A 1997 CEQ study of NEPA after 25 years concluded that the agencies could be more effective in the long run and save money and time in the short term if they collected less extensive data up front and instead placed greater emphasis on adaptive management. This would be a strategy wherein agencies would not try to remove all uncertainty but monitored the resource and made corrective changes to the plan if needed.

For example, in off highway vehicle designations of open, limited or closed that must be made in land use plans, there is often broad landscape information available, while highly detailed or complete information regarding numbers of antelope and locations of safety hazards and complete inventory of threatened and endangered species may not be available. The further acquisition of this costly and time consuming additional information may do little to ease controversy or clarify the decision to be made. Resource Management Plans may outline monitoring and adaptive management strategies to address the incomplete information.

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19. What are circumstances in which planning decisions may be deferred or staged?

Situations may exist when information needed to support informed decisions is not available in a reasonable amount of time. In these situations, planning decisions may be staged or deferred if it will not foreclose options for managing the resources. Staged decisions may be made if information will become available on an incremental basis. If a decision is deferred or staged, an explanation of how and when the decision will be addressed in the future must be provided.

20. What are the considerations in carrying over a decision from an existing land use plan into a new RMP?

Prior to a new land use planning effort, it is appropriate to evaluate the existing plan to determine if the goals and objectives are still appropriate, if the objectives are being met or are likely to be met or if there is new information or changed circumstances that would substantively alter the conclusions of land use plan. This formal plan evaluation (43 CFR 1610.4-9) should determine if existing planning decisions remain valid. These plan evaluations are administrative in nature and are not subjected to NEPA analysis and documentation. If the decisions remain appropriate and valid, then they may be considered for being carried forward in the new resource management plan. However, the resource conditions, goals or objectives may be affected by actions or decisions in the new plan and must be fully evaluated in the NEPA analysis for the new resource management plan.

Alternatives

21. Are planning alternatives allowed to be considered which would not meet the Land Health Standards?

At the land use plan level, the minimum level of desired outcome is the Land Health Standards. However, the standards may be amended as provided in Manual Section H-4180-1. If an alternative is considered which would allow uses that preclude achieving the Land Health Standards, then the land use plan must specify where the standards will not be met and why.

22. Should the RMP process consider alternatives that are suggested by interest groups or the public which represent extreme measures of resource management such as very high levels of preservation, very high levels of commodity use, or that would be very costly to implement?

All alternatives must be reasonable. Each alternative should have a reasonable likelihood of being selected and implemented. Alternatives that do not meet the purpose and need or represent extreme approaches that would not be considered reasonable decisions should not be included in the RMP detailed analysis. The RMP record and associated environmental impact statement should clearly provide the rationale for why these alternatives were considered but not analyzed in detail. The rationale would include reasons why the alternatives would not meet the purpose and need or would not be reasonable. The availability of funding to implement an alternative is a factor in determining its reasonableness. In general, the BLM should not constrain consideration of alternatives due to budget uncertainty. However, if an alternative would be so exorbitant to implement that it would not meet a standard of reasonableness, then that rationale should be provided in the discussion of alternatives considered but not analyzed in detail.

Planning Data and Planning Documents on the World Wide Web

23. How will the decision to use the world wide web to publish land use planning documents and data be implemented?

Implementation of this decision will require standardization of data and information, including metadata, data display, and data content. Some standards will be applied immediately as land use plans are initiated while some will be implemented over a period of years as results emerge from the Information Technology Support for Land Use Planning project or the Bureau Enterprise Architecture.

The immediate requirement is to document all data sets used in a land use plan by

creating metadata with the Federal Geographic Data Committee (FGDC) metadata standard. IM 2001-202 (August 3, 2001) sets the requirement for metadata.

Data display standards will be used to give planning documents and data a common organization and appearance across the Public Lands to facilitate use and understanding by the public.

Data content standards deal with the structure of data within a database and provides the ability to aggregate data regionally and nationally, makes data usable in many programmatic areas and enhances collaborative planning.

National Policies Initiatives and Time Sensitive Plans

24. What are the National Policy Initiatives that should be considered in the development of Resource Management Plans and how should this be accomplished in the planning process?

The national policy initiatives that should be considered in the development of Resource Management Plans include the Energy Policy and Conservation Act (EPCA), the National Fire Plan, the National Energy Initiative, BLM's Strategic Plan, Species Conservation Strategies and the OHV Strategy. These policies should be examined individually for specific direction. The planning process should examine the direction of these individual policies and assure that Resource Management Plan decisions do not preclude or conflict with the implementation of these policies. Implementation of these policies should be built into the alternatives considered where feasible. If unique circumstances are thought to warrant making a planning decision that would be inconsistent with these policies, coordination with the Washington Office must be done to resolve the conflict. In addition, the planning team should assure that the effects of implementing these policies are considered in the analysis of environmental consequences.