

## **WO/SO/FO Roles in the Planning Process**

The following discussion defines the general roles of the Washington Office and State Office in the planning process. The role of the Field Office (Field/District Manager) is discussed in more detail, especially as it pertains to guiding the planning process with a focus on each step in the process.

### **Washington Office (Director)**

The main role of the Washington Office (WO) is to provide policy and guidance. The WO reviews preparation plans and funds land use planning efforts based on State Director approved prep plans. The WO coordinates Departmental concurrence to publish *Federal Register* notices at required steps in the process. The WO will assist the states and field offices as needed to help resolve policy issues that pertain to individual plans. The WO resolves protests of the State Director's proposed decisions. The Director has delegated this authority to the Assistant Director for Renewable Resources and Planning.

### **State Office (State Director)**

The State Directors are delegated authority to amend and revise land use plans. The State Director is the approving official for all land use plan amendments and revisions. The State Director is responsible for the overall review and quality control of documents and for ensuring consistency with laws, regulations, and policy. State Directors are required to complete the *State Office Quality Review Table* (see IM-2002-100) as a means of documenting their review of planning documents and assuring consistency with laws, regulations, and policy.

### **Field Offices (Field/District Manager)**

An over-arching common thread that runs through each step in the planning process is the role of the manager in leading the process. The manager must establish a vision and lead the way. The manager must do everything he or she can to keep the process moving, to stay on schedule and within budget. The manager must consistently establish planning as a top priority and make other conflicting work a lower priority to the extent possible. The manager must be committed to the planning effort in order for it to succeed.

In guiding planning efforts, Field and District Managers face the challenge of reconciling Bureau-wide policy objectives with the needs and values of local, regional, and national constituencies. This requires a serious commitment to collaborative problem solving. As reflected in the coordination requirements of the Federal Land Policy and Management Act (FLPMA), the BLM places special importance on working closely with state, tribal, and local governments. They should be encouraged to work as cooperating agencies within the land use planning process.

New managers coming into the middle of a planning process should refrain from changing the direction of the plan and be careful not to "undo" any previous collaboration.

### Issue Identification (Scoping)

It is never too early to engage the staff and public (including tribes, local governments, and other agencies as cooperators) in the planning process. Make sure collaborators fully understand their commitment to the process, their roles and responsibilities, how decisions will be made, time frames and other constraints. There are several tools available to help facilitate collaborative efforts such as the Partnership Series, Economic Profile System (EPS), and cooperating agency status training.

Issues represent the things that are not working - where present management is deficient. Remember the old adage "If its not broke, don't fix it." Sometimes the staff and public will want to address things that don't need addressing (like recent decisions). Issues really frame the process and decide where you will put most of your effort into developing alternatives, so limit them to what is really at issue.

Once scoping is completed, it is important to provide feedback to the public on what we heard, the next steps and further opportunities for involvement or collaboration (in the form of a scoping report).

### Planning Criteria

Planning criteria provide the "sideboards" for the process (the legal, regulatory, and policy constraints) and constrain the decision-making space. A full understanding of the planning criteria by staff and the public helps to avoid confusion and "rabbit trailing" later in the process.

### Data Collection

Lack of data is often used as an excuse not to plan or make decisions. The staff (and sometimes segments of the public) will sometimes want more information before making appropriate decisions. The manager's job is to find the right balance - between having just the right amount of information when its needed and spending too much time and money collecting information that may or may not be needed. Also, remember to keep the issues in mind as they should drive data collection. The planning documents should also indicate future information/data needed to assess whether management actions are meeting goals and objectives.

### Analysis of the Management Situation (AMS)

The AMS provides a good opportunity to identify resource use or occurrence, characterize information on existing resource conditions and trends, summarize existing management, and brainstorm ideas for changes in management (management opportunities) to respond to the issues. Unfortunately, some planning efforts minimize the importance of this step. If done properly, the three main components flow into the draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) as follows:

- "Resource use/occurrence" and "existing resource conditions/trends" become the Affected Environment
- "Existing management summary" becomes the No Action (Present Management) Alternative
- "Management opportunities" become the basis for the action alternatives

This step also presents an opportunity for public involvement that (while not required) gives the public a

chance to review a key step in the process between scoping and release of the draft (which is often a long time period) and to provide additional information to be considered in looking at future needs for the area. Publishing an AMS summary for public distribution is an option to consider.

### Alternative Development

The development of a reasonable and sufficiently detailed range of alternatives is perhaps the most important step in the process where the manager needs close involvement. Whether working with the ID team or in a collaborative effort involving the public, the manager will need to find the right balance between letting the group struggle to reach consensus and knowing when to step in and make a decision to keep things moving. Nothing frustrates most people more than endless discussions where nothing is decided or going back and revisiting decisions that have already been made. All views usually can be accommodated within the range of alternatives, thus making consensus important only for the range of alternatives (have everyone's concerns been addressed in some manner in the alternatives?).

This step presents another opportunity for public involvement prior to the draft RMP/EIS. While not required, the public can help develop alternatives or at least be given an opportunity to review and comment on draft alternatives. At a minimum, applicable Advisory Councils and cooperating agencies should be engaged in the review of draft alternatives.

### Estimation of Effects

The most important role for the manager at this step is to keep the team on task and on schedule while addressing significant impacts. For the most part, this section depends on the technical specialists working mostly independently. Personal bias or philosophy should be kept out of agency documents so the manager must carefully review all sections. Sometimes the manager must make calls on professional vs. personal opinions. The team and any contractors need to agree on the protocol or criteria for addressing effects. Impacts should be quantified to the extent possible.

### Selecting the Preferred Alternative

Selecting the preferred alternative should be an interdisciplinary and a collaborative effort. It may not always be possible for everyone to agree on all aspects of the agency's preferred alternative, and the manager will ultimately have to decide. At a minimum, the public and partners should be involved in the development of selection criteria for the preferred alternative early in the process. Since the State Director is ultimately the responsible official for all land use plans, selection of the preferred alternative is always done in consultation with the State Director. Once the alternatives are defined and a preferred alternative identified, the manager should brief the State Director and Washington Office.

### Draft RMP/EIS

The manager needs to be personally involved in planning and conducting the public meetings that are held during the 90-day comment on the draft. The printing and comment period provides a welcome break for the staff from work on the RMP, so scheduling during the field season is encouraged to the extent possible.

### Proposed Plan/Final EIS

After the comment period on the draft closes, the manager will need to review public comments, comment analysis and documentation, and be closely involved in reviewing responses prepared by the staff. Key things to look for in responses are: 1) did we address the issues raised, 2) did we do it objectively without becoming defensive, and 3) did we explain why we didn't address any issues (for example, an issue was outside the scope of the planning process)? The manager should be closely involved in changes as a result of public comments. The State Director and WO should be briefed on major public comments and changes.

#### Protest Resolution/Record of Decision (ROD)

The manager needs to work with the State Office and Washington Office in the resolution of all protests in accordance with established procedures, prior to the State Director signing the ROD. The manager should review the analysis of all protests and draft responses to be sure they are responsive to the issues raised in each protest. Opportunities for the Field Manager or State Director to negotiate with protesters to withdraw or modify their protests should not be overlooked, although the manager must avoid making promises regarding what the decisions will contain.

#### Implementation, Monitoring, and Evaluation

Land use plans need to be living documents not something that just sits on the shelf. The manager will want to be involved and make sure that decisions are prioritized and help secure the necessary staffing and budget to implement. As decisions are implemented, the plan must be maintained and amended as needed. Decisions should be monitored not only to track whether they were implemented but also how effective were they in meeting plan goals and objectives. The plan should be periodically evaluated (at least every 5 years) to see if it is still effective or needs revision.