ATTACHMENT THREE

FACTORS TO CONSIDER FOR 4 C’s PROJECT SELECTION AND OPERATION

During its deliberations in preparation of the 4 C’s Report to the Assistant Secretary of Land & Minerals Management, the 4 C’s Working Group discussed a range of factors relating to 4 C’s project selection and operation. These factors are presented here as a resource for the BLM as it moves forward in the implementation of the 4 C’s Initiative. They are not intended to be prescriptive criteria. Rather, they are offered as a toolbox of considerations that may be useful in determining how bureau resources are best expended to attain the mission of the 4 C’s Initiative.

As previously indicated, the purpose of the 4 C’s Initiative is to institutionalize the Secretary’s 4 C’s and the new environmentalism in the daily business of the BLM. To that end, the initiative is about promoting and fostering innovation and implementation of 4 C’s principles and activities at all agency levels. The Initiative does not seek to limit creativity and inventiveness among BLM managers or citizens by filtering and prioritizing what projects can or cannot proceed. The initiative has as its singular focus facilitating citizen conservation and making full citizen stewardship of public lands a reality – not testing the worthiness of one or the other, or assessing their desirability through controlled experimentation and selected pilot trials. The initiative exists solely to enhance current 4 C’s practices through systematic and systemic institutional support and to discover and share more effective and better ways to make shared stewardship and place-based public participation the principle driving forces in public land planning and management. It is about affecting and attaining each of these ends through projects and activities defined as widely as possible and implemented as broadly as practical. These projects and activities, built on working partnerships with the agency, will map the future course of the 4 C’s on public lands.

Ideally, all 4 C’s efforts should be supported to some degree by the initiative. In part they will be, through creation of universally accessible data and information networks, the assemblage and dissemination of support and guidance materials to partners, including field office staff, removal of barriers to 4 C’s activities and projects, training and education, and integration of 4 C’s skills, knowledge and abilities into the core requirements for BLM staff. Despite the initiative’s open-ended and ecumenical approach to 4 C’s innovation and development, its ability to address all 4 C’s efforts equally and adequately is constrained by available resources. It is therefore necessary to explore the range of factors that can help BLM identify projects most appropriate to the Initiative and determine the best allocation of limited resources.

Operationally, the initiative is designed to support programmatic activities and on-the-ground projects that incorporate 4 C’s approaches to capacity development, public land planning and plan implementation. Project support can take many forms, but in general it entails providing and opening access for partners – both BLM and non-BLM – to information, assistance and guidance relevant to project and activity design, development, implementation and funding acquisition. To the extent targeted funds are available, the initiative can offer direction and recommendation for the dispersal of those funds to 4 C’s projects and activities, consistent with the initiative’s mission, goal and objectives, its framing or structural elements, and the various factors regarding project/activity selection and operation within the 4 C’s Initiative.
Selection factors set forth the attributes or conditions that determine which projects and activities are most consistent with the purposes of the initiative and which projects and activities should receive initiative support, including what form of support and in what quantities. Selection factors provide the means to identify and then prioritize or rank projects and activities for subsequent support within the 4 C’s Initiative. They help focus resources on those projects and activities that are most consistent with the mission, goal and objectives of the 4 C’s Initiative and which have the highest probability of contributing significantly to advancing the 4 C’s in general and community stewardship in particular within the bureau and on public lands.

Operation criteria set forth the guidelines for project administration – for the implementation and operation of projects in a manner that is consistent with the 4 C’s and the mission, goal and objectives of the 4 C’s Initiative.

It should be noted that projects not selected for focused support within the 4 C’s Initiative are not precluded from continuing to seek innovative and creative ways to solve land management issues. Indeed, it is important that these efforts continue to add to the base of knowledge for community stewardship that BLM wishes to enlarge.

In summary, factors are necessary to: (1) identify 4 C’s projects and activities most consistent with and contributory toward the purpose of full community stewardship of public lands; (2) rank the 4 C’s projects and activities that fall within that 4 C’s frontier of innovation; (3) prioritize 4 C’s projects and activities for types and levels of support; and (4) provide administrative guidelines for implementation and operation of projects consistent with the 4 C’s and the mission, goal and objectives of the 4 C’s Initiative. Below are the principal factors that meet these requirements. Project selection factors are sub-categorized by mission, process, implementation and outcomes. Project operation factors are not sub-categorized.

**Project Selection Factors** – Factors for standards and ranking to identify and prioritize projects for support and allocation of resources within the 4 C’s Initiative.

1. **Mission Factor** – *Projects proposed for inclusion and support within the 4 C’s Initiative should include or engage actions and activities consistent with the mission, goal and objectives of the initiative and the leading purpose of advancing full community stewardship of public lands; specifically:*

   - Qualifying projects should be based on shared stewardship partnerships between BLM, citizens and communities that provide for broad and substantive public participation in the planning, management, conservation, restoration and sustainable use of public lands, consistent with federal statutes and regulations;

   - Qualifying projects should embrace or promote integrated, landscape-level approaches to public land management that are consistent with conservation, sustainable land use, and healthy communities;

   - Qualifying projects should advance, enable or engage innovations in natural resource management and land governance, including the use of one or more 4 C’s tools or the contribution of new tools to the 4 C’s inventory;
Qualifying projects should help institutionalize within BLM and its staff a commitment to the values, processes and outcomes of citizen conservation and community stewardship as consistent with and necessary to the agency’s mission; and

Qualifying projects should be outcome-based in their implementation with clear and quantifiable performance elements established to measure and evaluate their success.

(2) Process Factor – Projects otherwise qualifying for support within the 4 C’s Initiative must exhibit the following process characteristics:

- Qualifying projects can originate from the initiative of BLM, citizen groups, Resource Advisory Councils (RACS) or any combination of the three; projects eligible for initiative support must, however, be (1) the shared product of a working partnership of equals between federal and public members; (2) place-based unless programmatic; and (3) locally driven by partnered BLM field staff, citizens and communities of place and interest.

- Qualifying projects must (1) include or, at a minimum, be open to the relevant universe of interested parties; (2) demonstrate substantial community support; (3) engage a process of project planning and NEPA compliance that is fully collaborative at the outset; and (4) establish, where appropriate to the NEPA process and project in question, the community- or consensus-based plan – the 4 C’s partnership proposal – as the preferred alternative.

- Qualifying projects must either be new or, if in progress, not substantially close to completion. In either case, qualifying projects must demonstrate:
  
  o Consensus among partners on project outcomes
  o Monitoring protocols keyed to indicators or benchmarks
  o Transparency in project operations
  o Clear and visible identification of partners and their memberships
  o Clear and visible assignment of roles and responsibilities among partners (including sideboards regarding agency role and power)

- Qualifying projects must demonstrate a substantive involvement of the local RAC or sub-group, including:
  
  o Review of and consultation on the project’s content between the local RAC, or a sub-group, and the project’s partnership; or
  o Initiation of the project by the local RAC, or sub-group

(3) Implementation Factor – Projects supported by the 4 C’s Initiative should share, to some measure, the following operational characteristics:

- Scope and purpose that include:

  o Promotion of working landscapes – distinct land areas and watershed units on which public land users, landowners, citizens and communities actively engage in some combination of sustainable resource use and conservation action,
including land, water and wildlife restoration, to advance the mission of the BLM, facilitate dynamic local economies, foster vibrant communities, and contribute healthy landscapes

- Reliance on inclusive, informed, and deliberative processes for decision-making
- Provision for fair, effective and efficient means to resolve disputes and conflicts related to project actions and activities
- Clear statement of what a project seeks and the means and strategies to attain it

- Contribution to the diversity of the 4 C’s Initiative that includes:
  - Geographic diversity – all public land states should be represented [Note: individual projects can occur in one or more states.]
  - Community diversity – both rural and urban interface communities [Note: individual projects can be rural or urban interface, or both.]
  - Stakeholder diversity – communities of interest and communities of place [Note: individual projects should include a spectrum of community diversity commensurate with the size and significance of the project.]
  - Resource issue diversity – full issue spectrum, including recreation, grazing, wildlife, minerals, and oil & gas [Note: individual projects may have a more narrow resource issue focus, the range of which is contingent on the extent and nature of the landscape covered by the project.]

- Adoption or advancement of landscape-level approaches to resource management; specifically:
  - Planning or implementation projects should include landscape-level components or contribute to landscape-level management solutions
  - Programmatic projects should promote capacity development, education, policy innovation or tools’ development appropriate to landscape-level management

- Incorporation of monitoring and reporting; specifically:
  - Qualifying projects should identify reasonable, practicable and measurable outcomes, including more short-term benchmarks and other outcome indicators, and the monitoring protocols to be used
  - Qualifying projects should identify partners responsible for monitoring and ensure that monitoring protocols are within the technical capacity of the partners
  - Qualifying projects must prepare and issue monitoring-based reports on a regular basis that assess and evaluate benchmarks and, as appropriate, outcomes

- Full partner understanding and acceptance of the ramifications and responsibilities of participation within the 4 C’s Initiative; specifically:
  - Projects are likely to be exposed to higher levels of visibility, scrutiny, oversight and pressures for success, including targeting for protest or appeals by potential opponents
  - Projects are likely to have compensatory or offsetting benefits for BLM field offices and their partners, including:
    - Greater immunity to successful protests or appeals
Potential funding advantages
Higher levels of logistic support due to high visibility within Department and among supportive communities and constituencies
Greater access to assistance that may be requisite for project success
Opportunity to become an agent of 4 C’s-directed change within the agency and among partnered communities

(4) Outcome Factor – Projects supported within the 4 C’s Initiative should contribute to the following programmatic outcomes:

• Qualifying projects should advance or contribute to the extension of 4 C’s innovation and the purpose of community stewardship of public lands.

• Qualifying projects should advance or contribute to landscape-level management.

• Qualifying projects should advance or contribute to sustaining working landscapes.

• Qualifying projects should contribute to the institutionalization of the 4 C’s among BLM staff and the permanent inclusion of the 4 C’s in the ways in which BLM does business.

• Qualifying projects should contribute to resolving or positively addressing significant barriers to 4 C’s applications on public lands (see Barriers and Solutions to 4 C’s Projects Implementations).

• Qualifying projects should contribute to the 4 C’s Initiative by:
  o Expanding access for all citizens to public land planning and management and
  o Enhancing management options and administrative tools for 4 C’s applications, including the setting of new standards for stewardship; and/or
  o Contributing to best management practices on BLM lands and improving or enhancing business practices within the BLM; and/or
  o Providing universal and transportable models and lessons to advance the 4 C’s, showcase program success, and inform future projects and partners on what works and does not work in the application of the 4 C’s.

• Qualifying projects should be rigorously examined and assessed before hand by assessing “what happens if the project is not done; what is lost and what is the cost of doing nothing?"

• Qualifying projects should not be judged on the certainty of success. Doable projects do not translate into guaranteed projects. Innovation requires risk; projects with merit justify reasonable risk. Projects should be considered not only for their affirmative contributions if they succeed, but also for the affirmative contributions they may offer, and the lessons they may teach us, in the unanticipated situations where they fail or fall short of desired outcomes.

Project Operation Factors – Factors for establishing administrative guidelines for implementation and operation of projects supported by the 4 C’s Initiative
• Projects must be structured and administered as partnerships.

• Projects must be achievable and operationally sustainable across time; specifically:
  o Projects must be capable of implementation within existing administrative authority
  o Projects must be operationally sustainable at the field office level; this means:
    ▪ Field offices must be able to accommodate project needs by adjusting competing workloads to minimize negative impact on other ongoing projects
    ▪ Projects should expand and contribute to existing staff management capacity by leveraging partner participation to optimize field office time and resources and to meet field office performance goals
    ▪ Project goal(s), objectives and activities should be consistent with reasonable federal and non-federal funding expectations in the near- and long-terms
    ▪ Projects should be self-sustaining to the extent possible; they should rely on local partner support and local funding sources to best ensure sustainability over time

• Projects must have strong information and transparency components; specifically:
  o Mechanisms to track projects and activities to determine what is working and what isn’t working
  o Reporting requirements to assess and evaluate long-term contributions of projects
  o Development of models from successful projects, including web-accessible inventory of administrative 4 C’s tools used, the context of their use, their outcomes, and any barriers encountered in their implementation

• Projects must broaden decision space for citizen partners; specifically:
  o Projects should have the broadest possible latitude for citizen participation
  o Projects should be developed consistent with statute; policy, guidance and rules should be reviewed and, when appropriate, amended to remove unnecessary barriers to project and activity implementation and shared stewardship
  o Projects should include RAC participation in project design, development, implementation, monitoring and reporting

• Projects must be administered at the field office level but should have full access to Departmental support, including:
  o Guidance on administrative options and tools for project design and implementation through the Coordinator and the 4 C’s Working Group
  o Access to and guidance from Solicitor’s Office, regional and in Washington
  o Outreach support from Office of External and Inter-Governmental Affairs
  o In general, high visibility support for 4 C’s activities from Secretary, Assistant Secretaries (L/M and PMB) and BLM Director (speeches, meetings, OpEds, feature articles and other forms of recognition)
• Projects must include active and continuous role for State Directors
  
  o State Directors’ support and participation is integral to success of each State’s 4 C’s projects; State Directors must be regularly updated and informed on projects
  
  o Incentives for State Directors’ support and participation must be clarified and communicated; they include:
    ▪ Potential access to additional funding (e.g., availability of targeted funds for projects supported within the 4 C’s Initiative)
    ▪ Opportunity to learn and be more successful in expanding and implementing resource conservation programs
    ▪ Opportunity to be significant change agent within agency
    ▪ Access to administrative tools for development of citizen stewardship options
    ▪ Greater recognition within the agency and the Department
    ▪ Higher or enhanced performance evaluations through innovative leadership and creative 4 C’s problem solving
  
  o State Directors should be included in project oversight, including project tracking, project annual review, and RAC and Coordinator consultations

• Projects that involve multiple agency jurisdictions or that entail integrated planning and implementation by multiple agencies and partners, should be encouraged; specifically:
  
  o Field Managers should take lead in coordination; State Directors should provide support
  
  o Multi-agency projects, to the extent they promote the 4 C’s and landscape level management, should have priority in special funding support, if available

• Projects should address all relevant fiscal considerations, including:
  
  o Partners should, to the extent possible, determine and address in advance of implementation any and all liability issues related to project operations
  
  o Partners should develop business plans for the life of their projects or at a minimum for five years to account for funding uncertainties

• The 4 C’s Initiative must operate within the administrative boundaries set by existing law; specifically:
  
  o The Department should perform risk assessment for the 4 C’s Initiative to determine the parameters in which it is willing or able to accept risk: *what are the limits to which existing statutes can be interpreted to facilitate 4 C’s innovation and how close to those limits is the Department prepared to go?* This assessment should include:
    ▪ Providing guidance and direction to partners
    ▪ Minimizing unwanted challenge and litigation
  
  o The Department should identify the primary legal sideboards within which administrative flexibility can be exercised and innovation in the field pursued; this will
    ▪ Provide guidance and direction for 4 C’s tool use
    ▪ Provide foundation for development of new 4 C’s tools
The 4 C’s Initiative should be subject to sunset provisions and its participating projects continuously assessed to determine ongoing support by the BLM; specifically

- Consistent with its purpose of institutionalization, the 4 C’s Initiative – as a formalized support service within the bureau – should be terminated at the end of 5 years unless a justification for its renewal is provided, documented and shown to be necessary to meet its mission, goal and objectives.

- 4 C’s projects should be continuously evaluated for eligibility for ongoing support
  - Projects should not be supported for reasons of habit or inertia; continued support is contingent on project performance and assessment and future project contributions to the mission, goal and objectives of the program.
  - Initial project implementations should have a specified time period to reach minimum benchmarks; success or failure in meeting those benchmarks will determine subsequent project support.
  - Exit strategies and benchmarks – the points at which projects have met or cannot reasonably meet performance outcomes – will be established for projects supported within the 4 C’s Initiative and exercised at the option of the Coordinator in consultation with partners, RACs and other oversight entities as may exist.