

UNITED STATES DEPARTMENT OF THE INTERIOR
Bureau of Land Management
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In Reply Refer to:

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EMS TRANSMISSION 05/09/2003

Instruction Memorandum No. OR-2003-069

Expires: 9/30/2004

To: DMs, DSDs , Staff and Branch Chiefs

From: State Director

Subject: Enhancing Public Communications and Minimizing Investments In Bureau
Publication Expenses

DD: 06/30/04

Program Area: This policy applies to all programs that require or promote formal publication of complex and relatively expensive documents (e.g. greater than \$10,000). The most commonly affected program areas will be land use and implementation or project planning, resource or landscape unit assessments, especially when environmental impact statements (EIS) are required.

Purpose: We are adopting a policy of reviewing all aspects of publication and outreach efforts to ensure that the intent of coordination, collaboration and effective communication is balanced within budgetary constraints. The applicable program leaders and associated Deputy State Directors will be charged with reviewing public outreach and publication strategies to ensure that all cost-effective and efficient means of communication are utilized before committing the Bureau to potentially excessive publication costs.

Policies/Actions:

1. All EIS analysis-level projects will have supplemental public communication plans to ensure that opportunities for publication cost control and effective outreach are utilized. The intent is to advise our stakeholders in a timely manner that all applicable documents will be available on compact discs and posted on Bureau websites to be consistent with and facilitate e-commerce and minimize taxpayer expense. All documents that must be published in paper form will continue to be made available in printed formats, but generally only upon written request for the full or long-form document. Pre-publication notice cards or letters will be used to advise persons on project mailing lists about publication, supporting record access opportunities and providing information on alternative forms of access. The primary exception to this screening procedure will be for other federal, state, local and tribal governments and local libraries, where need for access to the full document is assumed.
2. All publications which have an anticipated publication cost (limited to the formal printing under Superintendent of Documents procurement procedures) of greater than \$10,000 will be reviewed by the applicable program leader, project sponsor (see Oregon/Washington manual supplement 1601.08 Glossary), and Deputy State Directors. The review will generally be concurrent with other quality review steps already mandated by program or process guidance.

The review will include a discussion of the reliability, size and vintage of the mailing list (a) to ensure that it is current and germane to the project. The proposed document design (b) will be reviewed to see if all sections are critical for the public or can be adapted as "supporting records" and made available on compact discs and posted, but not commercially published. The proposed list of maps and appendices (c) will be reviewed to determine which, if

any, can be considered supporting records and not commercially published.

3. Public publication preference screening cards will be mailed a minimum of 60 days prior to document publication to offer addressees options of (a) dropping the addressee name from the mailing list, (b) notification by news release mailing (or e-mail message, if feasible) that the subject document will be on-line on a specified date, (c) receipt of just the compact disc or a printed executive summary (with or without one or more key maps, such as the preferred alternative or proposed action) and compact disc or (d) receipt of the complete document and map packet. It is recommended that option “d” be assumed for all intergovernmental mailings, such as other federal, state, local and tribal governments, especially where they have a statutory, regulatory or treaty interest in the project area or program.
4. State Office program leaders and planning project coordinators will review cartographic product expectations with the project team leader and responsible field official to determine which maps are mandated for publication by law, regulation, manual or handbook or otherwise indispensable to the understanding of the alternatives considered and proposed action. It is assumed that many “traditional” maps which display elements of the affected environment may be considered part of the supporting record and referenced, as anticipated by the Council on Environmental Quality at 40 CFR. 1502.21. This direction states, with emphasis added - *Agencies shall incorporate material into an environmental impact statement by reference when the effect will be to cut down on the bulk without impeding agency and public review of the actions. The incorporated material shall be cited in the statement and its content briefly described. No material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment. Material which is proprietary data which itself is not available for review shall be incorporated by reference.* The proposed list of maps to be published will be reviewed to determine which are explicitly required by the planning regulations, manuals and handbooks or may be required by program specific direction, litigation or legislation. The intent will be to not formally publish supporting record maps for baseline information, typically found in the “affected environment” chapter. The emphasis will be on publishing maps that display the most critical elements of the alternatives, or proposed or approved decisions as they relate to issues of substantial public concern.
5. The policy interpretation for “reasonably available for inspection” shall mean that the full document, including map packets, and the most important referenced documents, will be available for inspection during normal working hours in the applicable Bureau field office public room area. Posting of the full, published document in adjacent Bureau field offices or the State Office is also highly recommended. Posting should include, where feasible, at least one local library and the “public room” areas of any other government agencies which may be cooperators on your project.

Timeframe: This policy is effective immediately for any document that is expected to meet the \$10,000 cost threshold and is 60 days or more from the officially scheduled publication date. The public-preference notification cards need to be mailed at least 60 days in advance to allow mailing list purging and screening for format preferences.

Background: Recent projects with mailing or distribution lists of less than 1,000 addresses and that required preparation of an environmental impact statement could expect composite project publication costs of over \$100,000. An ongoing Oregon project with an anticipated need for 3,000 copies of a 1,000-page document with 60-70 colored maps was estimated to cost over \$100,000 for the single publication. These costs are well above traditional levels, beyond the budgets of most projects and potentially avoidable with revised policies and procedures. There has been no public objection to increased use of electronic posting of agency materials and many publics appear to prefer the all-day, all-week option to access and search for documents. In addition, the Bureau is moving towards cartographic software options that will allow the public to both access published maps and to separate and re-composite geographic map them layers to serve their own information or analysis needs.

Manual/Handbook Sections Affected: This guidance is consistent with the OSO manual supplement for Land Use Planning at 1601.04 A, B-7 and C-6 which emphasize program coordination, project management and electronic document access.

Coordination: Project managers and team leaders should coordinate with the applicable OSO resource or program leaders, project sponsor and the OR-912 Printing Specialist concerning publication cost estimates, public preference mailing cards, document content requirements and options for posting and public access.

Contact: This policy was developed by Eric Stone, Program Analyst for Planning and Environmental Coordination (OR-933) in consultation with Cliff McClelland, Printing Specialist (OR-912), and the WO-210 planning staff.

Districts with Unions are reminded to notify their unions of this Instruction Memorandum and satisfy any bargaining obligations before implementation. Your servicing Human Resources Office or Labor Relations Specialist can provide you assistance in this matter.

Signed by
Charles E. Wassinger
Associate State Director

Authenticated by
Mary O'Leary
Management Assistant

Distribution:
WO-210 (1075LS)