

Planning 2.0

Improving the Way we Plan Together

Public Input Summary Report

January 2015



Table of Contents

Introduction.....2

Section I

Goal 1: Create a more dynamic and efficient planning process3
Goal 2: Enhance opportunities for collaborative planning4
Goal 3: Plan across landscapes and at multiple scales5

Section II

Scope of Public Comment Summaries6
Public Comment Summaries on Specific Resources.....7
Public Comment Summaries on Specific Uses8
Public Comment Summaries on Special Designations.....9

Introduction

As part of its continuing commitment to improve management of the nation's public lands, the Bureau of Land Management (BLM) is reviewing the way it develops and updates Resource Management Plans (RMPs). RMPs provide the framework for management of the public lands. Every on-the-ground action undertaken or authorized by the BLM must conform to an RMP. As part of the Planning 2.0 initiative, the BLM will make targeted changes to specific areas in its land use planning regulations and handbook in order to:

- **Goal 1: Create a more dynamic and efficient planning process**
- **Goal 2: Enhance opportunities for collaborative planning**
- **Goal 3: Plan across landscapes and at multiple scales**

The BLM launched Planning 2.0 in May 2014 by seeking public input on how the BLM can improve the land use planning process. The BLM published a webpage (www.blm.gov/plan2) where the public could learn more about Planning 2.0 and how to participate. The BLM also hosted two public listening sessions in Sacramento and Denver, with an option to participate online via Live Stream and Webex in Fall 2014. The listening sessions featured group discussions on how to achieve the three goals of Planning 2.0; summary notes from the sessions are available on the Planning 2.0 webpage.

The BLM received written comments from over 6,000 groups and individuals. Approximately 50 letters contained unique comments. Public comments recommended a variety of approaches to achieve Planning 2.0 goals (Section I), as well as suggestions on how the BLM should manage specific resources and uses in RMPs (Section II). This report summarizes what the BLM heard from the public through written correspondence during this initial request for input into the Planning 2.0 initiative.

Goal 1: Create a more dynamic and efficient planning process

A large number of public comments focused on the RMP amendment process and how to integrate adaptive management into RMPs. Many comments suggested that the BLM establish achievable and measurable objectives to guide future decisions, as well as indicators and thresholds for resource condition in RMPs. For example, an RMP threshold would establish the minimum forage necessary to maintain viable wildlife populations. The BLM would monitor to ensure that thresholds for resource condition are met. If thresholds are not met, the BLM would be compelled to modify management strategies and complete an RMP amendment, as necessary, to address that particular resource. Some commenters suggested building change management into the RMP to allow for some degree of change before an amendment is triggered.

Some commenters noted that the BLM should have the ability to increase or reduce resource protections established in the RMP (e.g. lease stipulations) when authorizing projects if site-specific conditions warrant. On the other hand, many were concerned that such an adaptive management approach might allow activities that otherwise conflict with the other RMP goals and objectives. Commenters also asked that the BLM clarify the extent of its authority to implement site-specific closures or restrictions that are not explicitly contemplated in the RMP.

Data and Monitoring

Many comments focused on the importance of data and monitoring in the land use planning process:

- Include outside data sources in RMPs.
- Provide better public access to BLM data.
- Establish standards for monitoring in RMPs.
- Designate timeframes to modify management strategies based on monitoring results.
- Identify enforceable actions if monitoring does not occur (e.g. cannot authorize new projects).

Many comments discussed restricting the scope of planning efforts. For example, rather than making decisions for all resources and uses in an RMP revision, the BLM would only revise decisions that are affected by new “planning drivers”, such as habitat loss, new mineral potential, or increased recreation. Single-issue RMP amendments could efficiently address resources that span multiple field offices.

Public comments highlighted how multiple allocations and designations often overlap in current RMPs. As a result, many RMPs seem to permit incompatible uses in the same

area. Prohibiting overlapping allocations and designations would reduce redundant decision making and NEPA analysis, and result in a shorter and more understandable document. Commenters also suggested that developing standardized decision language would increase efficiency. This idea is discussed in further detail under *Goal 3: Plan across landscapes and at multiple scales* (page 5). Several commenters suggested that efficiencies could be gained by working with partners to avoid duplication of efforts.

While nearly all comments supported the goal of “a more dynamic and efficient planning process”, many commenters were concerned that RMPs could become so “dynamic” that they become meaningless. One commenter cautioned that the BLM should not “maximize its own discretion at the expense of clarity and certainty for all stakeholders” in its RMPs. Many stakeholders want assurance that the public lands will be managed as indicated in the RMP over the long term. By determining allowable uses, designations, and management actions, RMPs are a valued mechanism for providing certainty. For example, one commenter requested that RMPs explain exactly how decisions will be implemented and the type of environmental analysis that will occur for each implementation decision.

Goal 2: Enhance opportunities for collaborative planning

Public comments affirmed the value of public participation as essential to the success of any land use plan. As summarized by one stakeholder: “any effort to increase the speed of the planning process that reduces or minimizes public participation will decrease the overall efficiency of the planning process”. The public views a robust, collaborative planning process as “a vital mechanism by which BLM can obtain public support for its land use plans” and ensure that the public interest is served. Several commenters expressed the need for broad, comprehensive stakeholder participation and requested BLM conduct strategic and targeted outreach at the onset of all planning efforts to reach stakeholders. Commenters also encouraged the BLM to collaborate with other federal agencies, which often manage adjacent lands, and to conduct outreach to Tribes who have affiliations with a new planning effort.

Numerous commenters suggested two new opportunities for public involvement:

Pre-Scoping. “Pre-scoping” would be the first step of the RMP revision process. During pre-scoping, the BLM would solicit input about resource data needed for RMP development, and encourage stakeholders to contribute inventory information. Pre-scoping would enable the BLM to identify preliminary stakeholders and management issues. Information gathered during pre-scoping would form the basis for the Analysis of the Management Situation and support a more productive public scoping process.

Review of Preliminary Management Alternatives. A public review of preliminary management alternatives would occur between public scoping and the publication of the Draft RMP/EIS. Based on this review, the BLM could then refine the range of alternatives to address public concern, which ensures a meaningful NEPA analysis is conducted in the Draft RMP/EIS. Many BLM offices, such as the Las Cruces and Moab Field Offices, have already incorporated a public review of preliminary management alternatives into their land use planning efforts.

The BLM received comments on different ways to effectively engage the public. Commenters requested that the BLM leverage web-, tele-, and video-conference technology to reach a larger audience, particularly in rural areas where in-person meetings are less feasible. The use of technology, however, should be balanced with meaningful involvement opportunities for members of the public without technological access. As opposed to formal public hearings, commenters noted the benefit of “listening sessions” led by trained facilitators as a way to foster more productive dialogue between the BLM and the public. Commenters also noted the value in varying the formats and locations of involvement opportunities to reach a broader audience. One stakeholder suggested that the BLM hold community training sessions about the land use planning process before an RMP revision begins, so that individual citizens can be more empowered to participate.

Best practices for enhancing public participation

Commenters also recommended that the BLM:

- Provide meeting materials ahead of time.
- Post recordings of presentations and discussions online.
- Ensure that all public comments are counted and disclosed in the RMP.
- Provide the option to accept all public comments and land use plan protests via email.
- Develop an “RMP Summary” section that shows all management decisions for a geographic area.
- Develop materials using clear, understandable language. Define all technical terms.
- Make all RMPs and other planning documents available online.

Goal 3: Plan across landscapes and at multiple scales

Several commenters proposed instituting a landscape level planning process for the BLM. In a landscape planning paradigm, each BLM field office would be assigned to one or more ecoregions. Commenters proposed that the BLM conduct land use planning at two levels:

Ecoregional Planning. The BLM would evaluate public lands at the ecoregional level (e.g. similar to BLM’s Rapid Ecoregional Assessments). The BLM could assess all resources and uses present using concepts such as intactness, restoration potential, and resource utilization levels. The BLM would then set desired conditions for different landscapes, and establish priority areas for conservation and priority areas for development within the ecoregion.

Field Office Planning. After ecoregional planning, the BLM would allocate allowable uses and make special designations at the field office level. All allocations and designations for an area would have to be consistent with the desired conditions and priority areas established at the ecoregional level.

Conversely, some commenters questioned the utility of landscape level planning. It is important to many stakeholders that RMPs provide specific, local context and clearly articulate for local users how the BLM will manage public lands close to them. For example, landscape level planning may not be meaningful for stakeholders that need to see which travel routes will be open and/or closed in their communities.

Additionally, some members of the public are concerned that the BLM might limit development only to those priority areas identified in an ecoregional plan. For example, as described in one public comment, “with technological advances, areas previously thought to have poor potential for oil and natural gas development are now some of the nation’s most productive. It would be shortsighted to try to predict which areas hold the highest mineral potential and restrict development just to them”. Public comments also stated that effective landscape planning should be fully integrated with the NEPA process, and provide clear direction for considering state and private lands. At the same time, commenters cautioned that the BLM should ensure that landscape level planning does not result in time-consuming analysis that overlaps the NEPA analysis that already occurs during an RMP revision. One commenter asked that BLM clearly identify the decision processes that will be used to develop more specific alternatives and mitigation measures if they are not developed in the RMP.

Planning for Mitigation

Many comments urged the BLM to integrate the Department of Interior’s mitigation policy (Secretarial Order 3330) into the land use planning process, and:

- Evaluate mitigation at a broad, regional scale.
- Coordinate mitigation with state fish and wildlife agencies.
- Develop a mechanism to ensure that mitigation investments remain in place over multiple RMP revisions.

Commenters identified “basic consistency” in how the BLM conducts land use planning as a necessary component of planning across landscapes and at multiple scales. For example, it was suggested that the BLM standardize resource objectives that would apply on all public lands and require that offices incorporate them into new RMPs. Likewise, it was also recommended that the BLM establish standardized language and baseline management prescriptions that would be required for common RMP decisions (e.g. prohibit Right of Ways in all Areas of Environmental Concern). Much of the public who provided input believes that a greater degree of consistency between RMPs would help the BLM better assess and adjust management of similar resources across field office boundaries.

Scope of Public Comment Summaries

In addition to input on how to meet Planning 2.0 goals, many public comments contained recommendations on how the BLM should address specific resources, uses, and special designations in RMPs. The following pages contain brief summaries of representative public comments. The section is not exhaustive of every comment that the BLM received; rather it captures common ideas discussed by the public.

Some comments submitted to the BLM were outside the scope of Planning 2.0's purpose of improving the BLM's land use planning process. Through the land use planning process, the BLM evaluates tradeoffs and chooses an appropriate balance of resource protection and use on the public lands. Public comments related to the administration of specific BLM programs (e.g. issuance of permits) are governed by other BLM policies and regulations, and are not included in this report.

Additionally, this report does not include summaries of comments that recommended actions, such as the total exclusion of a particular use, as these would conflict with BLM's mandate to manage the public lands for "multiple use" and "sustained yield".

Next Steps

The Planning 2.0 initiative will include revisions to the BLM's Land Use Planning Regulations (43 CFR 1601 and 1610) and a revision of the Land Use Planning Handbook (H-1601-1). The BLM will review and consider all public input received during the Planning 2.0 public outreach. In general, public input that relates to the broad procedural requirements of planning may be appropriately considered in the regulatory revision, whereas input related to the detailed steps taken to implement the regulatory procedures or program-specific guidance may be more appropriately considered in the handbook revision. Input received will also be considered in relation to the initiative goals and whether the suggestion contributes to achievement of the goals; whether the suggestion is feasible given reasonably foreseeable budgets; whether the suggestion is consistent with other statutes, regulations, or policy; and whether the suggestion is consistent with other changes being considered under Planning 2.0. The BLM anticipates that the Proposed Rule will be available for formal public comment at www.regulations.gov in the summer of 2015. The BLM will issue a press release announcing the comment period and notify any interested public that has signed-up for the Planning 2.0 email list.

Public Comment Summaries on Specific Resources

The following are public comment summaries related to how the BLM should address specific resources or analyses in the land use planning process:

Climate Change

Emphasize managing for ecosystem resilience. Designate the following in RMPs:

- *Restoration Zones*: areas that are devoted to forestalling change through the process of ecological restoration.
- *Innovation Zones*: areas that are devoted to innovative management that anticipates climate change and guides ecological change to prepare for it.
- *Observation Zones*: areas that are left to change on their own time to serve as scientific “controls” and to hedge against the unintended consequences of active management elsewhere.

Lands with Wilderness Characteristics

- Establish required management restrictions (e.g. ROW exclusions) if BLM decides to manage an area for wilderness characteristics.
- Complete a comprehensive inventory of lands with wilderness characteristics during an RMP revision.
- Inventory findings (including documentation) should be publically available prior to the inventory being used in an RMP revision.
- Update the wilderness characteristics inventory based on new information provided by the public.
- Evaluate a full range of alternatives for managing lands with wilderness characteristics in RMPs.
- Clarify that many recreational uses are compatible with protecting wilderness characteristics.

Visual Resource Management (VRM)

- Require that all BLM lands be inventoried (VRI) and classified (VRM) during RMP revisions.
- Require that VRM Class I be applied to all wilderness areas and WSAs.
- Establish minimum VRM classes for conservation designations (e.g. all ACECs should be designated at least VRM Class II).
- Consider the impact of VRM decisions on lands adjacent to conservation areas (i.e. “VRM buffers”).
- Consider night skies in the VRM portion of the land use planning handbook. Develop minimum management prescriptions for night skies to be included in future RMPs.

Wildlife

- Designate migration corridors, stopover habitat, watchable wildlife areas, Important Bird Areas, migratory bird management areas, and other types of priority habitat in RMPs.
- Map important wildlife movement corridors across the landscape using Rapid Ecoregional Assessments, Crucial Habitat Assessment Tool (CHAT) data, and other landscape-level tools in RMPs.
- Require that RMP objectives be tied specifically to state wildlife agency population and management objectives. Adopt State Wildlife Action Plan goals in RMPs.

Cultural Resources

- Prioritize cultural resource surveys in areas that are likely to contain a high concentration of cultural resources.
- Conduct cultural resource surveys before and during the development of RMP alternatives.

Socioeconomics

- Provide qualitative and quantitative discussion of non-market values.
- Analyze economic inputs and outputs in the larger context of BLM’s budget.
- Analyze economic costs and benefits through “total economic valuation” methods (e.g. social cost of carbon calculations).

Wildland Fire

- Conduct fire modelling to identify:
 - Areas that have departed from historical vegetative variability.
 - Areas that are resilient and resistant to wildfire disturbance.
- Determine where wildfires will be suppressed and where wildfires will be allowed to burn in RMPs.

Wild Horses and Burros

- Determine population objectives and identify areas where wild horses are not desired in RMPs.
- Consider public attitudes and preferences when making wild horse and burro decisions in RMPs, such as forage allocations for wild horses.
- Ensure RMPs are clear and transparent regarding how the BLM will set and reevaluates Appropriate Management Levels (AML).

Noise

- Develop specific decisions to protect natural soundscapes in RMPs.
- Establish a classification system for inventorying and managing natural soundscapes that resemble visual resource inventory and management (VRI/VRM) classes (i.e. Class I, II, III, and IV soundscapes).

Public Comment Summaries on Specific Uses

The following are public comment summaries related to how the BLM should address specific uses in the land use planning process:

Oil and Gas

- “[Master Leasing Plans] MLPs should be the rule, not the exception”. Adjust MLP criteria regarding existing leases and industry interest to make MLPs more applicable.
- Decisions and analysis in current RMPs are not sufficient to support oil and gas leasing. Specific decisions on leasability should be made in an MLP. At the RMP-level, the BLM should only determine if areas are generally suitable for oil and gas activity.
- RMPs should continue to include oil and gas leasing decisions. RMP analysis should eliminate the need for additional NEPA analysis during oil and gas leasing.
- Lands with “low” or “no” development potential should generally be closed to oil and gas in RMPs.
- Change paradigm from applying the “least restrictive stipulation” to applying the “most effective stipulation” in RMPs.
- Consider deferring leasing during an RMP revision, especially when leases are proposed in areas that are being evaluated for a special designation (e.g. ACEC).
- RMPs should treat oil and gas as a “principal or major use”.
- RMPs should not restrict oil and gas activities to only “priority” development areas.

Travel Management

- RMPs should prioritize the retention and maintenance of roads and trails that provide access for hunting, fishing, and wildlife management.
- Include non-motorized trails on travel management maps.
- Incorporate the regulatory minimization criteria (43 CFR 8342.1) into land use planning policy.
- Require Class III inventory during travel management route designations.
- Exclude illegal, user-created routes from the baseline route inventory and travel maps.
- Establish a “minimum road network” standard for NLCS units (i.e. minimum amount of roads needed to meet the unit’s purpose).
- Conduct concurrent RMP development and route designation only for key, high-conflict areas. Move away from an “all or nothing” approach for doing route designation concurrent with an RMP revision.
- Travel management plans should make specific designations for bicycles (as opposed to including bicycles with other forms of “mechanized travel”).
- Require RMPs to describe how the BLM is providing public access for hunting, fishing, and other dispersed recreation.

Renewable Energy

- Designate the following in RMPs:
- *Renewable Energy Development Areas (REDAs)*: areas with excellent wind and solar resources that are in proximity to existing infrastructure and have limited resource conflicts. Incentivize development in REDAs.
 - *Variance Areas*: areas outside of REDAs where wind and solar development may be viable but potential conflicts exist. Require applicants to demonstrate that their purpose and need could not be met within a REDA.
 - *Conservation Management Areas*: areas with sensitive and important resources that are incompatible with wind and solar development. Exclude development in these areas.

Utility Corridors

- Designate corridors for transmission lines and pipelines in RMPs.
- Incentivize development in designated corridors. Require project applicants proposing development outside of corridors to demonstrate that their purpose and need could not be met within a corridor.

Livestock Grazing

- RMPs should identify lands not available to grazing to serve as “reference areas” for purposes of baseline comparison.
- RMPs should identify environmental stressors that may preclude or limit the extent to which an area may be available for livestock grazing.
- Account for factors such as recurring drought and frequent fire return intervals in determining capacity.
- RMPs should include measureable objectives, terms and conditions for grazing permits, criteria for assessing voluntary waivers, procedures for retiring grazing, procedures for creating and amending allotment management plans.
- RMPs should consider enclosure networks, forage capacity, forage requirements, water wells, pipelines, and springs, and utilization levels when making relevant decisions.

Recreation

- Establish clear standards for issuance of Special Recreation Permits (SRP) in RMPs.
- Extensive Recreation Management Areas (ERMA) should be for quiet non-motorized experiences. Special Recreation Management Areas (SRMA) should be for more developed recreation activities.

Public Comment Summaries on Special Designations

The following are public comment summaries related to how the BLM should address special designations in the land use planning process:

Backcountry Conservation Areas (BCA)

- Develop BCA policy, which would be a new designation to protect “intact and undeveloped backcountry areas with high-quality habitats and dispersed hunting and fishing opportunities” and other “important recreation experiences”.
- Maintain public access in BCAs, but prohibit detrimental recreational motorized use.
- Promote active restoration in BCAs.
- Examples of resource decisions that would apply in BCAs:
 - Primitive/Semi-primitive Recreational Opportunity Spectrum
 - Limited or closed to OHV
 - No Surface Occupancy (NSO) for oil and gas
 - ROW exclusion
 - Renewable energy exclusion
 - Available for grazing, as long as it has no negative effect on habitat/water
 - No new locatable mining claims

Areas of Critical Environmental Concern (ACEC)

- Define ACEC “priority” to indicate a preference for maintaining existing ACECs and designating new ACECs to manage relevant and important values. ACEC designation should occur where those values can be protected through designation of an ACEC.
- Broaden ACECs to include:
 - Research Natural Areas
 - Outstanding Natural Areas
 - Important Bird Areas
 - Scenic Corridors.
- Identify categories of ACECs. For example:
 - Community Watershed ACEC
 - Community Airshed ACEC
 - Wildlife Core Area ACEC
 - Wildlife Linkage ACEC
 - Restoration ACEC
- Name ACECs in a manner that relates to the relevant and important values.
- Establish specific baseline management prescriptions for each “type” of ACEC (e.g. habitat ACEC, cultural ACEC, scenic ACEC).

National Landscape Conservation System (NLCS)

- Incorporate policy from the new NLCS manuals approved in 2011.
- Do not make Wild and Scenic River (WSR) suitability determinations in RMPs. Restrict RMPs to identifying eligible segments.