

**To:** Theurer, Lyndsay[ltheurer@blm.gov]  
**Cc:** Joel Brumm[jbrumm@blm.gov]; Anthony Kerwin[akerwin@blm.gov]; Timothy Fisher[tjfisher@blm.gov]; Marcia DeChadenes[mdechade@blm.gov]  
**From:** Magee, Gerald (Jerry)  
**Sent:** 2017-11-21T18:53:54-05:00  
**Importance:** Normal  
**Subject:** Re: Question on IM 2009-226 vs. 2000-062 - Interim Management Policy for Newly Created National Monuments  
**Received:** 2017-11-21T18:54:08-05:00  
[IM 2000-062 Interim Mgt for New Natl Monuments.docx](#)  
[IM 2009-226 Interim Mgt Policy for New NLCS units under OPLMA.docx](#)  
[IM2009-226 mgt actions for new designations att1.pdf](#)  
[Checklist for New Monuments April 2013.docx](#)  
[Instructions-Checklist for New Monuments April 2013.docx](#)  
[NMs NCAs List of IMs and IBs 07202015.xlsx](#)

Hi Lindsay,

Good sleuthing to find that 2009 IM. After several searches, I finally found the missing attachment in one of my more obscure directories (under "IMs and IBs" as opposed to "New Monument Guidance").

I have attached other docs that may be of interest to you. (I cc'd several others who might find the gathered attachments useful for archival or sharepoint purposes.)

One particular attachment is an excel spreadsheet listing "all" NLCS guidance as of 2015. I qualified "all," b/c I notice that IM 2009 226 doesn't appear on the list. But you'll see some interesting items, including a link to IM 2000 062. I made a Word version of it and attached it.

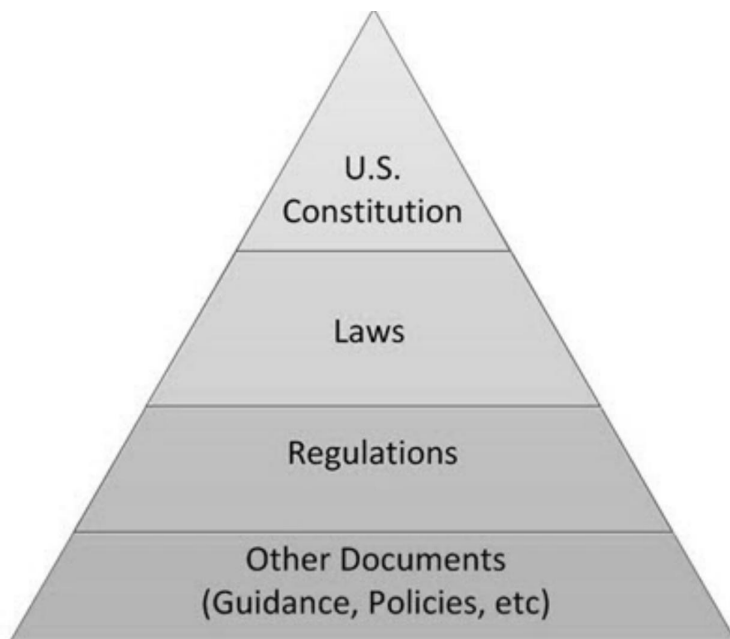
I also attached a 2013 "New Monuments Checklist" and the more detailed and informative "New Monuments Checklist Instructions." These were all I had in my "New NLCS Units" e file, but they are more current than the 4 pp attachment we were looking for.

As for expiration dates, all of the IMs are technically expired. The theory is that you can extend an IM only once (I believe) and after that, if you still need the guidance you should put it in a manual (which is no small task, so rarely undertaken).

What we tend to do is continue using IMs/IBs after their expiration dates if they still provide useful/helpful guidance and nothing better has replaced them. (A side benefit of this approach is you can also ignore expired IMs that you don't like.)

Legally, although an expired IM is technically no longer "current," following it's guidance provides a level of consistency that can help BLM avoid "arbitrary and capricious" rulings. It's similar to "accepted or standard medical practice" at the time of treatment.

An expired IM isn't that far down on the legal defensibility hierarchy, as it falls into the "policy" range that's already pretty much at the bottom. Most hierarchies of authority follow the order depicted below:



And for each of these categories, there are equally weighted court cases interpreting those categories (in order of US Supreme Ct, US Circuit Courts of Appeal, and then Federal District Courts).

But needless to say, Policies and Guidance are at the bottom of the list, primarily helping us to avoid "arbitrary and capricious" rulings for random processes, unsupported conclusions, and faulty or non good faith analyses.

So my take is that an expired IM that still provides logical guidance that hasn't been replaced by anything newer is still better than nothing at all.

Sorry for the sidetrack. Just letting you know that we do rely on past, relevant guidance regardless of its expiration date, honoring the thought processes and precedential value that it contains (principle of stare decisis: to stand by things decided).

I hope all of this helps.

Jerry Magee  
BLM Oregon-Washington State Office  
Wilderness & Nat'l Conservation Lands Program Lead  
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On Tue, Nov 21, 2017 at 1:47 PM, Theurer, Lyndsay <[ltheurer@blm.gov](mailto:ltheurer@blm.gov)> wrote:

Also I noticed the 2009 one was temporary expiring in 2010, so it obviously wasn't intended to replace the 2000-062 one. I typed the wrong 2000 IM number in my previous email. So I guess my only remaining questions are whether IM-2000-062 was permanent or also temporary? Do you know a working link or have this as a PDF? When I search 2000 IMs nothing comes up.

~Lyndsay

On Tue, Nov 21, 2017 at 1:22 PM, Theurer, Lyndsay <[ltheurer@blm.gov](mailto:ltheurer@blm.gov)> wrote:

Hi Jerry,  
Do you have any idea how I can get to IM 2009-226 attachment 1 "Management Actions for Newly Designated National Landscape Conservation System (NLCS) Units". This is the link I have found to the IM, <https://www.blm.gov/policy/im-2009-226>, but I can't see the 4 page attachment. I'm also wondering if this 2009 IM replaced 2000-226 Interim Management Policy for new monuments (in references you sent), or simply supplements it, and both are relevant? I'm reviewing all the citations you send, the solicitor's response on which RMP, etc. related to upcoming projects in the expansion area.

Thanks

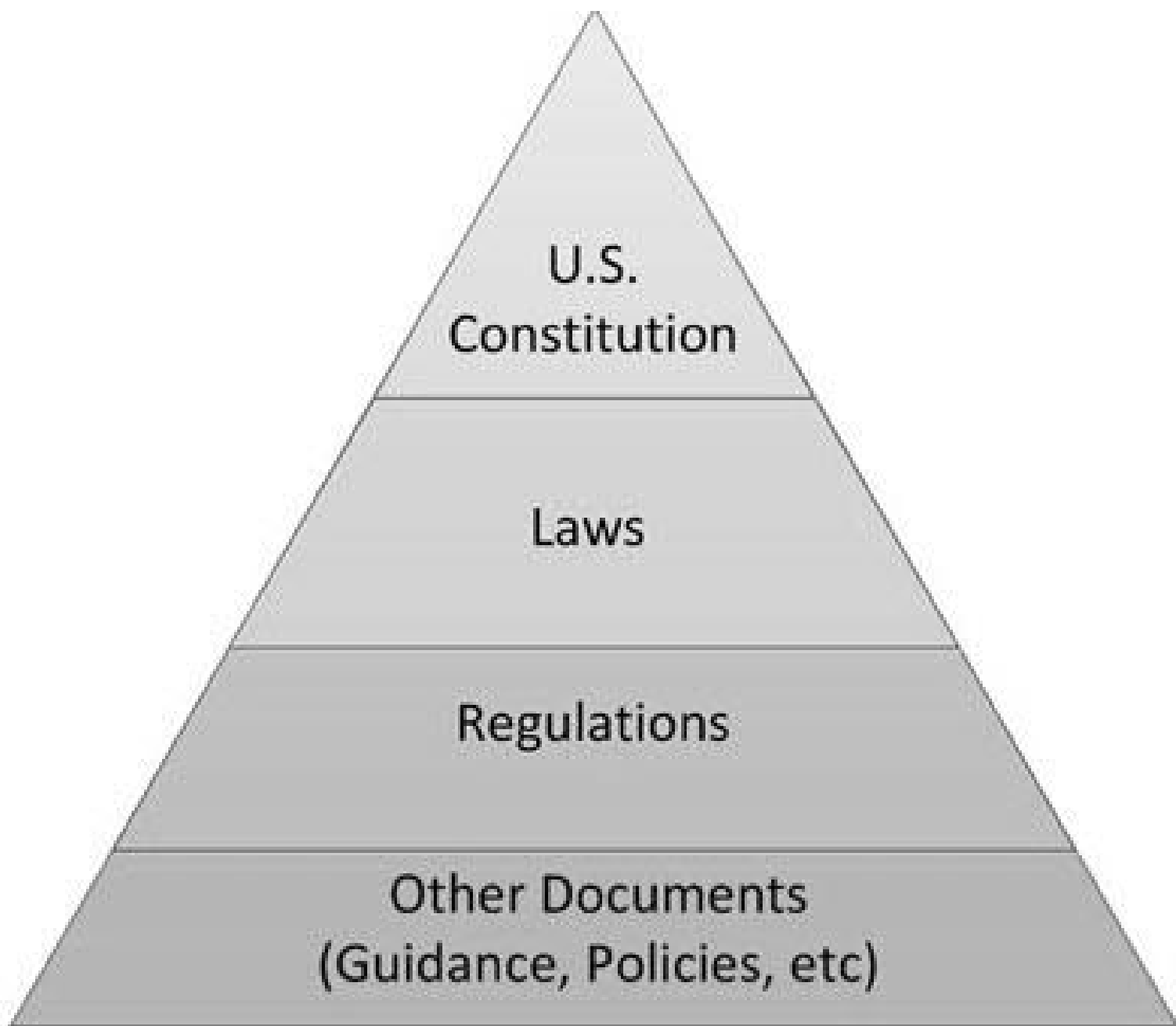
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UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
WASHINGTON, D.C. 20240  
<http://www.blm.gov>

January 11, 2000

In Reply Refer To:  
2071 (WO-100) N

EMS TRANSMISSION 01/12/2000  
Instruction Memorandum No. 2000-062  
Expires: 09/30/2001

To: State Directors and Assistant Directors

From: Director

Subject: Interim Management Policy for Newly Created National Monuments

I am excited to announce the creation of three new National Monuments for which the Bureau of Land Management (BLM) has been given management responsibility by the President: the Grand Canyon-Parashant National Monument in Arizona, the Agua Fria National Monument in Arizona, and the California Coastal National Monument. This stands as an endorsement of our stewardship and care of the Grand Staircase-Escalante National Monument and a commitment to protecting the scientific and historic objects and natural and cultural resources that constitute these national monuments.

To that end, today I am issuing an Interim Management Policy for newly created BLM national monuments. The guidelines in this policy are designed to provide direction to the field managers responsible for the proper care of new national monuments, pending the completion of the required planning processes. For each new national monument, I will issue separate guidance that details the specific requirements that the President has required in the Presidential Proclamation and requirements or issues that the Secretary and I believe should be implemented or addressed upon designation.

Signed by:  
Nina Rose Hatfield  
Deputy Director

Authenticated by:  
Robert M. Williams  
Directives, Records  
& Internet Group, WO540

1 Attachment  
1 - Interim Management Policy (3 pp)

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**Interim Management Policy**  
for newly designated BLM National Monuments

Adhere to direction in the President's Proclamation:

- Federal lands and interests in lands within the Monument are withdrawn from all forms of entry, location, selection, sale, leasing, or other disposition under the public land laws, including among others the mineral leasing and mining laws.
- Valid existing rights will be recognized.
- The State's responsibilities and authorities regarding wildlife management, including fishing and hunting, within the Monument are unaffected by the Proclamation.
- Grazing activities shall continue to be governed by applicable laws and regulations other than the Proclamation.
- Existing withdrawals, reservations, or appropriations are not revoked, but the Monument is the dominant reservation.

Maintain existing management policies, designations, and allocations except where changes are necessary to comply with the Proclamation and protect the objects of scientific and historic interest within the Monument.

Provide the public with prompt and accessible information on questions regarding the use of federal lands within the Monument. Coordinate with the State, Tribes, and other governmental entities (under existing agreements and any new arrangements deemed necessary) to disseminate and exchange information and cooperate in management actions, consistent with applicable legal authorities and other directives.

Assure the applications, proposals, and future use requests pending when the Proclamation was issued are subject to the terms of the Proclamation, including its recognition of valid existing rights, and other management directives and decisions relate to the Monument.

Consider land or easement acquisitions and land exchanges that will enhance the values of the Monument. All existing planning documents related to the Monument lands should be reviewed for consistency with the Proclamation. Consistent with NEPA and FLPMA, the plans should be modified or a new plan created for the Monument that addresses all resource issues in the Proclamation. A separate planning document for the Monument is recommended, as opposed to combining the Monument with an adjacent administrative resource area.

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Discussion of Specific Activities

In general, actions that are not precluded by the Proclamation and which do not conflict with the established purposes of the Monument may continue. Allowed activities can be restricted only where (1) the BLM, through processes required by existing law, identifies places where such

uses ought to be restricted or prohibited as necessary to protect the federal lands and resources, including the objects protected by the Monument designation; or (2) where the BLM finds a clear threat from such a use to the federal lands and resources, including the objects protected by the Monument designation and the circumstances call for swift protective action.

**Livestock Grazing:** Where applicable, livestock grazing within the Monument is permitted, pursuant to the terms of existing permits and leases. In the Monument (as in all properly managed grazing pastures), appropriate grazing management practices should be followed to protect rangeland resources. You should continue to ensure the implementation of Standards and Guidelines for Rangeland Improvement in the Monument. Not exceeding proper stocking levels is of paramount importance. Actions should be taken to assist permittees in assuring compliance with existing requirements. Enforcement actions against trespassers or other violators continue to be authorized.

**Animal Damage Control:** Modify existing agreements with the Animal and Plant Health Inspection service (APHIS) animal damage control, specifically targeting individual predators rather than predator populations.

**Camping:** Dispersed recreational camping may continue consistent with current policies and practices and the Proclamation. Developed BLM camping facilities should be maintained and rehabilitated as appropriate, consistent with Monument purposes.

**Facilities:** Maintenance of existing facilities should be permitted, subject to compliance with current policies and practices, provided Monument resources are protected. Applications for new facilities may be considered, if they will protect or enhance Monument resources.

**Hunting and Fishing:** Coordinate with the State to ensure public safety, specifically if there are areas of increased visitor use.

**Mineral Activities (including Hardrock, Oil, Gas, and Coal):** The Proclamation reserved and appropriated all federal lands and interests in lands within the Monument and withdrew them from all forms of entry, location, selection, sale, leasing, or other disposition under the public land laws, including the mineral leasing and mining laws. Thus, no new federal mineral leases will be issued within the Monument, and authorization for activities on existing mineral leases will be governed by valid existing rights. As to hardrock minerals, no new mining claims can be located, and no new prospecting or exploration activities can be undertaken to identify locatable minerals or to establish the discovery of valuable mineral deposits. Plans of operation for mining operations are not to be approved unless the Department has finally determined the validity of the mining claims and mill sites covered by the plan. If BLM receives notice of an operation not requiring plan approval, you should consult with the Office of the Solicitor before deciding how to proceed.



**Noxious Weeds/Exotic Species:** Existing noxious weed control activities should continue. Exotic species should not be introduced, unless doing so is essential to control noxious weeds or other undesirable species.

**Off-Road Vehicles:** For the purpose of protecting the objects identified in the Proclamation, no areas in the Monument should be authorized for cross-country, off-road vehicular use, except for authorized administrative and emergency purposes. Motorized and mechanical vehicular use should only occur on designated roads or routes. Management discretion should be exercised where necessary, through emergency closures or other actions, to protect Monument resources.

**Paleontological Resources and Rock Collection:** The collection of specimens should not be permitted, except where intended for legitimate scientific uses for which documentation is provided to the satisfaction of the responsible management official.

**Rights-of-Way:** No new rights-of-way or ancillary public facilities should be processed, except for rights-of-way pursuant to existing policies and practices and necessary for access to private or state inholdings.

**Roads:** In general, improvements should be minimal and designed solely to correct those conditions that are unsafe or hazardous. Activities that maintain, as opposed to enhance, existing roads may be permissible.

**Scientific, Archeological, and Historical Investigations:** These investigations are important to increase our understanding of the Monument's resources, but surface disturbance should be avoided.

**Signs and Interpretation:** Provide appropriate signs at Monument boundaries and post other relevant information as needed. Initiate actions to interpret Monument resources and values and provide environmental education to visitors on important topics (i.e., visitor safety and resource protection).

**Surface Disturbance and Reclamation Activities under Current Permits:** These activities should proceed consistent with current permits. Permit extensions may be considered subject to consistency with applicable policies and procedures, only if consistent with Monument purposes.

**Vegetation Manipulation:** Chaining and other methods that cause substantial surface disturbance shall not be permitted.

**Wilderness Study Areas:** Where applicable, maintain the non-impairment standard for wilderness study areas, per FLPMA, to prevent undue and unnecessary degradation of resources.

**Activities on Non-Monument Lands:** Activities on non-Monument lands that are causing, or expect to cause water quality deterioration, soil degradation, or other damage to Monument lands-whether directly or indirectly-must be reported to the responsible management official for appropriate action.

## Management Actions for Newly Designated National Landscape Conservation System (NLCS) Units

### 1. Implement Protective Management

Deadline: January 30, 2010

Action: Review policies and plans for consistency with enabling legislation and the BLM Land Use Planning Handbook (appendix 3, page 27). Subject to valid existing rights, activities damaging to recognized values should be suspended pending completion of resource management or activity plans. Effective on-the-ground management of recognized values requires monitoring and surveillance. Management may also include compliance checks, reclamation, and facility construction or maintenance.

*Program-specific guidance:*

- **National Monuments and National Conservation Areas**
  - Action: Withdraw federal lands and interests in lands within national monuments and national conservation areas, subject to valid existing rights, from all forms of entry, location, selection, sale, leasing, or other disposition under public land laws including, among others, the mineral leasing and mining laws.
  - Action: Identify a stand-alone manager for each new area.
  - Action: Consider land or easement acquisitions and land exchanges that will enhance the values for which the area was designated.
- **Wilderness**
  - Action: Review existing authorizations and plans; do not implement actions which are inconsistent with the designating legislation or BLM's wilderness regulations (43 CFR 6300). The moratorium on implementing such actions will stay in effect until (1) the authorization or plan can be amended; (2) a program-specific interim plan can be written; (3) completion of a wilderness management plan; or 4) the activity can be brought into compliance via analysis in a NEPA document.
  - Deadline: March 30, 2010  
Action: Develop a monitoring and surveillance plan.
- **Wild and Scenic Rivers**
  - Action: Evaluate proposed projects on federal lands to ensure they protect and, to the extent possible, enhance river values (free-flow, water quality, and outstandingly remarkable values).

### 2. Document Baseline Conditions

Action: Undertake inventory of values for which each new NLCS unit was designated.

*Program-specific guidance:*

- **Wilderness**
  - Deadline: March 30, 2010  
Action: Complete identification and documentation of wilderness characteristics as they existed at the date of designation. Include impacts from structures and other physical disturbances affecting the undeveloped nature of wilderness, natural conditions, or other conditions affecting wilderness character.
- **Wild and Scenic Rivers**

- Deadline: January 30, 2010  
Action: Describe the existing conditions of the values for which each river was designated:
  - Free-flowing Condition -- Describe in-channel condition to guide future analyses of proposed water resources projects under Section 7(a) of the Wild and Scenic Rivers Act; i.e., describe structures existing at the date of designation and general hydrologic function.
  - Water Quality -- Describe water quality based on existing information (e.g., state water quality standards for the designated river or reach).
  - Outstandingly Remarkable Values -- Describe each outstandingly remarkable value in detail based on pre-designation study and/or other existing information.
- **National Scenic and Historic Trails**
  - Deadline: September 30, 2010  
Action: Complete a visual resource management inventory and trail condition assessment. Collect Global Positioning System data for the trail during the course of this work.

### 3. Develop Management Plan

Deadline: September 30, 2010 for preplans.

Action: Identify where plans are needed, conduct baseline inventories, and develop pre-plans. All new units must submit a pre-plan to the Washington Office. See the BLM Planning Handbook for information on preplanning.

*Program-specific guidance:*

- **National Monuments and National Conservation Areas**
  - Deadline: March 30, 2011 for Fort Stanton-Snowy River Cave National Conservation Area; March 30, 2012 for Dominguez-Escalante National Conservation Area, Red Cliffs National Conservation Area, Beaver Dam Wash National Conservation Area, and Prehistoric Trackways National Monument.
  - Action: Complete a management plan.
- **Wilderness**
  - Action: Develop a wilderness management plan as soon as practical after designation.
- **Wild and Scenic Rivers**
  - Deadline: March 30, 2012  
Actions: Wild and scenic river management plans should include a carrying capacity analysis. The plan should provide direction for evaluating proposed projects, including goals and desired conditions, and guidance for developments and activities on federal lands and related waters.
- **National Scenic and Historic Trails**
  - Deadline: March 30, 2011  
Actions: Coordinate with the U.S. Forest Service to develop a comprehensive management plan for each trail.

4. Prepare Congressionally Required Maps and Legal Descriptions of Boundaries and Update BLM Records

Deadline: September 30, 2010

Action: Prepare official maps and legal descriptions accurately portraying the boundaries of each NLCS unit.

Action: Review BLM records to determine need for modification. Master Title Plats and the Historical Index should be given first priority for revision. Maps of all boundaries and descriptions should be available for public inspection in both the Washington Office and in locations convenient to the designated units. Staff should create serialized case files, including congressionally required maps, for each designation. Case files should be maintained at the State Office.

*Program-specific guidance:*

- **Wild and Scenic Rivers**

- Deadline: March 30, 2010

Actions: Establish river corridor boundaries not exceeding an average of 320 acres per river mile. Boundaries are to be delineated based on natural or man-made features (canyon rims, roads, and ridge tops, etc.) and on legally identifiable survey or property lines. Boundaries may be finalized through a land management planning process. Pending the establishment of detailed river boundaries, the interim boundary is one quarter mile on each side of the river as measured from the ordinary high water mark. Notice of the availability of the boundaries and classification, and of any subsequent boundary amendments, shall be published in the Federal Register within one year, and shall become effective ninety days after they have been forwarded to Congress from the Department.

- **National Scenic and Historic Trails**

- Actions: Cooperate with the U.S. Forest Service in preparing the official map and legal description. Pending the establishment of a detailed right of way, retain public lands in federal ownership. No significant relocations of the trail are permitted. For interim purposes, significant relocations shall be defined as reroutes beyond approximately one quarter mile of the Congressional Route.

5. Install Signs

Deadline: January 30, 2010

Action: Sign new areas at key access points.

*Program-specific guidance:*

- **National Scenic and Historic Trails**

- Action: Replace existing trail signs with those exhibiting the official logo.

6. Designated Official Contacts for Unit

Deadline: January 30, 2010

Action: Designate a field office contact for each new NLCS unit. All designated contacts should be reported to WO program leads.

*Program-specific guidance:*

- **National Scenic and Historic Trails**

- Action: Appoint Oregon and Arizona trail liaisons to serve as the designated BLM contacts for the U.S. Forest Service and the primary trail organizations.

7. Brief and Train Employees

Deadline: January 30, 2010

Action: Provide responsible field staff with a one-day training on legal requirements of new designations.

*Program-specific guidance:*

- **Wilderness**

- Deadline: March 30, 2011

Actions: Ensure that all managers and staff with wilderness responsibilities complete "Unit Wilderness Stewardship" and the following web-based classes: "Wilderness Act," "Minimum Requirements Decisions," "Wilderness Stewardship Planning Framework," and "Wilderness Visitor Use Management." Senior level managers should take also complete "National Wilderness Stewardship," while field managers, program leads, and key staff should also complete "Regional Wilderness Stewardship."

8. Provide Washington Office with Photos of New Units

Deadline: January 30, 2010

Action: Provide digital images of newly designated units to Bonnie Winslow in the NLCS Washington Office. Images will be used in a variety of outreach products including exhibits, brochures, and the NLCS website. Images should reflect landscapes, multiple use activities, volunteer activities, and partnerships or community activities. Images should be jpegs, 5x7, and 300 dpi or higher. Include a caption with a description and general location.

9. Provide the National Operations Center and Washington Office with GIS shape files

Deadline: January 30, 2010

Action: Provide Debra Dinville, Chief, Resource Technology Section, with GIS boundary layers for new designations. Where shape files do not originate with the BLM, please indicate the source (e.g. Forest Service).

10. Recreation Management Information System

Deadline: January 30, 2010

Action: Enter new designations into the Recreation Management Information System (RMIS). Work with Tina McDonald, RMIS Program Manager, on establishing new designations in the system. Visitation to these areas must be entered into RMIS annually.



# **INTERIM MANAGEMENT POLICY FOR NEW COMPONENTS OF THE BUREAU OF LAND MANAGEMENT'S NATIONAL LANDSCAPE CONSERVATION SYSTEM DESIGNATED THROUGH THE OMNIBUS PUBLIC LAND MANAGEMENT ACT OF 2009**

***IM 2009-226***

Instruction Memorandum

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
WASHINGTON, D.C. 20240

September 30, 2009

In Reply Refer To:  
6100 (170) P

EMS TRANSMISSION 10/07/2009  
Instruction Memorandum No. 2009-226  
Expire: 9/30/2010

To: State Directors: Arizona, California, Colorado, Idaho, New Mexico, Oregon and Washington, and Utah

From: Director, National Landscape Conservation System and Community Partnerships

Subject: Interim Management Policy for New Components of the Bureau of Land Management's National Landscape Conservation System designated through the Omnibus Public Land Management Act of 2009

Program Areas: The National Landscape Conservation System: National Monuments, National Conservation Areas, Wilderness, Wild and Scenic Rivers, and National Scenic Trails.

Purpose: This Instruction Memorandum provides management policy to Bureau of Land Management State Directors for new National Monuments, National Conservation Areas, Wilderness Areas, Wild and Scenic Rivers, and National Scenic Trails.

Policy/Action: The attached document addresses the short-term management of new additions to the NLCS.

Time Frame: This guidance is effective immediately.

Background: The NLCS comprises BLM-administered public lands that have been designated by the President or Congress in recognition of their nationally significant values. The following new NLCS units were designated through the Omnibus Public Land Management Act of 2009:

Arizona: 31 miles of a national scenic trail (Note: the U.S. Forest Service is the administrating agency for the trail)

California: four wilderness areas, six wilderness additions, and two wild and scenic rivers

Colorado: one national conservation area and one wilderness area

Idaho: six wilderness areas and 16 wild and scenic rivers

New Mexico: one national monument, one national conservation area, and one wilderness area

Oregon and Washington: four wilderness areas and nine miles of a national scenic trail (Note: the U.S. Forest Service is the administrating agency for the trail)

Utah: two national conservation areas, 14 wilderness areas, 11 wild and scenic rivers

Budget Impact: Funds for the management of these areas have been allocated to affected States in the Fiscal Year 2009 budget.

Manual/Handbook Sections Affected: None

Coordination: The development of this document has been coordinated with WO-210, WO-240, WO-250, and WO-600.

Contact: Carl Rountree, Director, National Landscape Conservation System and Community Partnerships (WO170) at 202-208-3516.

Signed by: Authenticated by:

Carl Rountree Robert M. Williams

Director, National Landscape Conservation System Division of IRM Governance, WO-560 and Community Partnerships

1 Attachment:

1 - Management Actions for Newly Designated National Landscape Conservation System (NLCS) Units (4 pp)



## **WELCOME TO THE BLM'S NATIONAL LANDSCAPE CONSERVATION SYSTEM!**

**[www.blm.gov/nlcs](http://www.blm.gov/nlcs)**

### ***New National Monuments & NCAs Checklist – Instructions***

#### ***1. Know your authorities:***

- The designating authority that created the unit (proclamation or legislation) is the law, and is the primary authority upon which planning and management for the unit will now be based. Read the proclamation or legislation, carefully identifying the unique resources, objects, and values for which the unit was designated, any and all management prescriptions applicable to the unit, and other management-relevant provisions. Some objects are esoteric and intangible; think about how to manage them in your unit's context.
  - Refer to the Canyons of the Ancients Nat'l Mon. RMP/EIS for an example of how to identify objects from a proclamation.
- Read OPLMA, Secretarial Order 3308, and FLPMA, and consider management of your unit in the context of these authorities' provisions. Remember, the monument or NCA's designating authority takes precedence over any conflict with the BLM's multiple use mandate.

#### ***2. Know your policies:***

- Manual Sections 6100, 6220, and others that apply to NLCS designations within your units, and any policies that apply to the resources, objects, and values for which your unit was designated, and/or uses that exist on the unit. Manual section 6220 applies to Monuments and NCAs, and is the BLM's overarching policy for managing these units. If there's any apparent conflict between the law and policy, the law controls.

#### ***3. Take Action to Implement Policy***

- Identify an interim unit manager for state and national offices, and the public, to contact. At this stage, an Assistant Field Manager, Field Station Manager, Outdoor Recreation Planner, etc. is appropriate. In addition to being a primary point of contact, this interim manager should also plan to identify needed and available staff for the unit, as well as partners, volunteers, and any others who may contribute to achieving the unit's objectives and serve its interested public.
- Pay close attention to changes in land use policy now that the unit is designated, especially with respect to rights-of-way, lands and realty, uses, and other potential stressors to resources, objects, and values.
- Initiate projects to educate the public about the new designation, such as Internet postings, updated Websites, boundary signage, interpretive kiosks, and so on. See IM-2013-076 re: NLCS wordmark.
  - Refer to Fort Ord Nat'l Mon., and the 2009 OPLMA designations for examples.
- Plan for budget changes.
  - Monuments and NCAs are eligible for funding in subactivity 1711.
  - Each and every Monument and NCA should have a unique Organizational Code (regardless of size or where it sits in the organizational hierarchy). Begin the process to create an Org Code as soon as possible. This helps the BLM develop, execute, and track the budget for the benefit of the unit.
  - Identify historical base and one-time funding used to manage the public lands that are now the unit, taking into consideration any organizational overhead that national, state, district, and field offices may take (usually 25-30%), and additional needs as a result of designation. Plan to request that these funds be "re-programmed" into subactivity 1711.
  - Communicate the budget situation to State and Washington Office program leads and managers, including immediate budget needs.
- Read and get to know the 15-Year NLCS Strategy and your state's step-down strategy, and think about how to implement them at your unit. Coordinate with State Office NLCS leads.
- Integrate the unit into BLM's systems and processes, including budget, planning, RMIS, FAMS, LR2000, etc.
- Review relevant Instruction Memoranda, such as:
  - IM-2013-094 re: Resource Management During Drought
  - IM-2013-082 re: Use of Regional Assessments
  - IM-2013-080 re: Education, Interpretation, and Youth Engagement Strategy
  - IM-2013-076 re: NLCS Short Name and Wordmark

- IM-2013-067 re: FY2015 LWCF Project Submissions
- IM-2013-063 re: Use of Paid Advertising
- IM-2013-053 re: Processing Charter and Nominations Packages (FACA)
- IM-2013-038 re: Usage of BPS for Project Planning in FY2014
- IM-2013-014 re: Revised Guidance for Establishing Implementation Priorities for Land Use Plans
- IM-2013-012 re: NLCS Research Support Program
- IM-2012-146 re: Rescinding WO IM 2010-118 re: Section 390 Categorical Exclusions
- IM-2012-141 and -140 re: Paleontological resources policies
- IM-2012-113 re: BLM New Media and Social Networking Policy
- IM-2012-111 re: National Monument and NCA FY 2011 Reports (for reference)

4. *Know your players*: programmatic and line management contacts, partners, sister agencies, tribes, interested publics, elected officials, local and national interest groups, and so on.
- Create a contacts list and get invited to any applicable calls or meetings: line managers, program staff, chain of command, etc.
  - National Lead : Doug Herrema, [dherrema@blm.gov](mailto:dherrema@blm.gov), 202-912-7172
    - States: Oregon/Washington – Jerry Magee; New Mexico – James Sippel
  - Plan to participate in monthly program conference calls – third Thursdays at Noon and 2pm Eastern.
  - Get to know your partners and interested publics, if you don't already. Setting up a conversation or two can go a long way. Attending other organizations' meetings can really build trust.
    - Refer to Jim Foote, Santa Rosa & San Jacinto Mountains Nat'l Mon. Manager, for best practices.
  - Cultivate volunteers; they're the lifeblood of many Monuments and NCAs.
  - Brief the SO and WO about your unit – a powerpoint or webex presentation to let us all know how special the area is can help us do our part to protect it!
  - Develop an outreach strategy / communications plan. Coordinate with Public Affairs and NLCS Leads.

#### **Manual Section 6220 Policy (with explanation in italics)**

##### 1.6.D. Management of Newly Designated Monuments and NCAs.

Upon designation of a new Monument or NCA or similar designation, or where the following actions have not been carried out for existing components, the BLM will:

1. Review policies and governing resource management plans for consistency with the designating legislation or proclamation. *RMPs and activity plans, as well as local policies, must be consistent with the authority that designated the unit. Record inconsistencies, which should be taken into account during subsequent land use planning to update plans for the unit.*
2. Subject to valid existing rights, and in accordance with applicable law and regulation, consider suspending or modifying discretionary uses and activities incompatible with the designating legislation or proclamation pending completion or amendment of a land use plan. *Refer to BLM regulations and policy for the process of emergency closures or other use modifications.*
3. Appoint a manager for each new area who has decision-making and supervisory authority and whose primary duty is to manage the Monument or NCA. *In the interim, the unit manager can be a point of contact with supervisory authority, such as an Assistant Field Manager, Supervisory Outdoor Recreation Planner, etc.*
4. Assign a unique organizational code for each Monument/NCA. Offices must plan and report all spending and accomplishments within each Monument and NCA using these unique organizational codes. *Do this as early as possible, as it takes a little time for the NOC to assign a code.*
5. Develop an outreach strategy designed to inform the public about and build a sense of local stewardship for the designation. *Refer to the 15-year NLCS Strategy and your state's step-down strategy for guidance, and work with your state and national program lead.*
6. Develop and install entrance signs at key Monument or NCA access points. Major entrance signs must identify the area as part of the BLM and a unit of the NLCS. See Manual 9130 for additional guidance. Boundary signs must be located within one foot of the Monument or NCA boundary. It is prohibited to install boundary signs on an approximate or set back line.

7. Initiate inventories of the objects and values for which the Monument or NCA was designated. *It is imperative to know what it is we're protecting, and where these objects and values are found on the unit.*
8. If required by Congress, prepare maps and legal descriptions that accurately portray the boundaries of each Monument or NCA. See Manual Section 6120 for additional guidance. *Even if it's not required, it's still a good idea.*
9. Ensure that new Monuments and NCAs are entered into BLM databases and information systems, including LR2000, RMIS, FAMS, etc.

#### 1.6.G. Land Use Planning.

1. Land use plan decisions for Monuments and NCAs and similar designations must be consistent with the legislation or proclamation that established the Monument, NCA, or similar designation.
2. The BLM will provide land use plan direction for Monuments and NCAs in one of four ways: by developing a new stand-alone land use plan for the particular component, by amending an existing land use plan, by integrating the component's planning process into the planning process for a new or revised land use plan, or by an implementation-level plan, if deemed appropriate by the State Director in consultation with AD-400. Each Monument or NCA will have an independent Record of Decision or Decision Record that explicitly applies to that component.
3. Decisions regarding the planning approach for a Monument or NCA will be made in consultation with the BLM's Washington Office Division of the National Landscape Conservation System.
4. Land use plans must analyze and consider measures to ensure that objects and values are conserved, protected, and restored. Specifically, plans must:
  - a. clearly identify Monument and NCA objects and values as described in the designating proclamation or legislation; where objects and values are described in the designating legislation or proclamation only in broad categories (e.g. scenic, ecological, etc.), identify the specific resources within the designating area that fall into those categories;
  - b. identify specific and measurable goals and objectives for each object and value, as well as generally for the Monument or NCA;
  - c. identify management actions, allowable uses, restrictions, management actions regarding any valid existing rights, and mitigation measures to ensure that the objects and values are protected;
  - d. provide, to the extent possible, a thorough quantitative analysis of the effects of all plan alternatives on the objects and values;
  - e. where a thorough quantitative analysis is not possible, provide a detailed qualitative analysis of the effects of all plan alternatives on the objects and values;
  - f. consider designating Monuments and NCAs as ROW exclusion or avoidance areas;
  - g. include a monitoring strategy that identifies indicators of change, methodologies, protocols, and time frames for determining whether desired outcomes are being achieved; and
  - h. be evaluated at least every five years, consistent with and as required by BLM land use planning guidance.
5. If other NLCS designations occur within a Monument or NCA, planning requirements applicable to each overlapping designation must also be met.
6. Within six months of approving a Monument or NCA plan, subject to available staffing and funding, managers will begin preparing a plan implementation strategy. At a minimum, the implementation strategy must outline the work to implement the plan over its first three to five years and the priority and timing of this work. All approved Monuments and NCAs must also complete an implementation strategy.

**WELCOME TO THE BLM'S NATIONAL LANDSCAPE CONSERVATION SYSTEM!**

**[www.blm.gov/nlcs](http://www.blm.gov/nlcs)**

***NEW NATIONAL MONUMENTS & NCAs CHECKLIST – What to do right after designation***

**1. *Know your authorities***

- ☐ Get to know the proclamation that created the Monument
- ☐ Identify and record the objects for which the Monument was designated
- ☐ Identify management prescriptions and other relevant provisions
- ☐ Familiarize the team with OPLMA Section 2002, FLPMA, and other relevant statutes
- ☐ Read Secretarial Order 3308

**2. *Know your policies***

- ☐ Read relevant BLM Manuals and consider how they relate to your Monument:
  - ☐ Manual Section 6100 – NLCS
  - ☐ Manual Section 6220 – National Monuments, NCAs, and Similar Designations
  - ☐ Other \_\_\_\_\_
- ☐ Read other Manual Sections that may apply to your unit, including Recreation, VRM, Minerals, etc.
- ☐ Refer to potentially relevant Instruction Memoranda.
- ☐ Read relevant Resource Management Plans, activity plans, and other land use plans that apply and review for consistency with the designating authority.

**3. *Take actions to implement law and policy***

- ☐ Identify an interim manager/point of contact (e.g. Asst. Field Manager, Outdoor Rec Planner, etc.).
- ☐ Pursue relevant and needed training (e.g., volunteer coordination, partnerships, lands and realty, budget, etc.).
- ☐ Consider potential changes in land use policy and discretionary decisions because of designation.
- ☐ Initiate projects to educate the public about the new Monument.
- ☐ Assign an Organizational Code to the new Monument.
- ☐ Identify historical funding for management of the public lands that are now the Monument, including overhead (25-30%).
- ☐ Initiate the process to re-program other subactivity funds into subactivity 1711.
- ☐ Communicate the budget situation, including immediate needs, to your State and Washington Offices.
- ☐ Read and get to know the 15-Year NLCS Strategy and your state's Step-down Strategy.
- ☐ Integrate the Monument into BLM's systems: FAMS, LR2000, RMIS, MIS, PMDS, etc.

**4. *Know your players***

- ☐ Create a contact list of all relevant BLM, other federal, tribal, state, local, and interest group contacts.
- ☐ Participate in monthly National Monuments and NCAs Conference Calls on the third Thursday of each month.
- ☐ Engage partners – go to other organizations' meetings.
- ☐ Brief the SO and WO about your new Monument.
- ☐ Develop an outreach strategy / communications plan in coordination with Public Affairs and NLCS Leads.