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June 8-10)

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Public Land Management: Planning, Problems, and Opportunities

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Public Land Management:
Planning, Problems, and Opportunities

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The Public Lands During the Remainder of the 20th Century:
Planning, Law, and Policy in the Federal Land Agencies

Natural Resources Law Center
University of Colorado School of Law
June 8-10, 1987

1. PERCEIVED WEAKNESSES OF THE BUREAU OF LAND MANAGEMENT HAVE --IN A CLEARLY UNEXPECTED WAY--CONTRIBUTED TO THE CREATION OF A FOCUSED, EFFECTIVE, USEFUL LAND USE PLANNING PROCESS.

A. There is a great deal of truth to: "Your strengths are your weaknesses; your weaknesses are your strengths."

B. BLM weaknesses, especially in contrast to the Forest Service, are often seen to include: (Clarke and McCool, Staking Out the Terrain, 107-124 (1985)

1. late creation as an agency--1946;

2. a late charter--in Oct. 1976; (Federal Land Policy and Management Act, PL 94-579, 43 U.S.C.1711-1712)

3. an unfocused multiple use mandate;

4 poverty; and

5. the resulting poor public image.

C. The Bureau started planning because of specific needs, stumbled and failed, and often changed course. The first formal system, established before FLPMA, produced Management Framework Plans (MFP).

1. They were prepared for 350 "planning units," parts of the Bureau's lowest administrative units; these covered 80% of the public lands.

2. MFPs involved a three-step process:

Step 1 - advocacy for optimization of individual resources.

Step 2 - compare recommendations/identify options.

Step 3 - managers decide types and intensity of

uses. (Robert Jones, "Developing a Planning System for Public Domain Lands," 1981.)

D. The present approach is an incremental response to the perceived problems of the previous system:

(David Williams, "Planning Approaches in the Bureau of Land Management," 4-5, 1986.)

1. "Tunnel vision";
2. Skewed toward economic interests;
3. Little guidance on making "tradeoffs";
4. Inadequate (obsolete) or excessive data;
5. Too general or too specific;
6. Poor incorporation of the requirements of NEPA (the National Environmental Policy Act, PL 91-190, 1969; 42 U.S.C. 4321 et seq.)
7. Highly variable public participation;
8. Fixation on the plan as the final product of planning;
9. Rigidity;
10. "Planning for Planning's Sake"; and finally;
11. Concerns that plans did not really change the decisions that BLM was making. (Johanna Wald, "State and Local Involvement in Federal Land Management and Planning," Redstone Conference, notes, 1983.)

II. THE FEDERAL LAND POLICY AND MANAGEMENT ACT (FLPMA) DID NOT INITIATE, BUT RATHER AFFIRMED, THAT THE NATION'S POLICY IS RETENTION OF THE PUBLIC LANDS AND A COMMITMENT TO MULTIPLE USE. (PL 94-579, 43U.S.C.1711-1712, 10/21/76)

- A. "Multiple Use" evolved as national and BLM policy only through a long and not easy process: (Paul Culhane, Public Lands Politics, 1981.)

1. BLM was created in 1946 as a combination of:
 - a. The General Land Office (created in 1812);
 - b. The Cadastral Survey (created 1785); and
 - c. The Grazing Service (created by the Taylor Grazing Act - 1934)
2. The General Land Office had, prior to 1946, assumed management of Western Oregon timber lands. (Oregon & California Act of 1937.)
3. The Grazing Service had, by necessity, started to concern itself with wildlife and wild horses.
4. The critical turning point for BLM was 1964:
 - a. Congress passed the Classification and Multiple Use Act (PL 88- 607) which provided for dividing public lands into those to be retained, those to be disposed of, and those to be studied. This law was only intended to last 6 years, putting great pressure on BLM.
 - b. Congress simultaneously established the Public Land Law Review Commission (PL 88-606) to look at the over 3000 laws under which BLM operated. The PLLRC spent six years to produce their report, One Third of the Nation's Land, which emphasized the necessity of an organic act--a firm, statutory base--for BLM.
5. Despite the multiple use mandate and 20 years as a merged organization, BLM at this point was still basically a "collection of resources." There were (and are yet) about 20 individual programs, such

as range, lands, and oil & gas, duplicated at the national, state office, and district levels; individuals are hired/promoted within program series; Congress budgets by 50 separate program accounts.

6. These resource programs and individuals have worked more closely together resulting in BLM becoming more "multi-disciplinary."

B. The passage of the National Environmental Policy Act in 1969 had profound effects on BLM:

1. NEPA requires that all Federal agencies consider the environment in an "inter-disciplinary" manner.
2. Coping with the demands of NEPA, especially in the preparation of environmental impact statements (EIS), required BLM to hire staff of many new professions, such as economists and outdoor recreation planners, who are now rising in BLM. For example, most of the land use planning team leaders are from these new professions.

C. BLM has great difficulty in defining "multiple use."

1. FLPMA defines multiple use in a long paragraph summarized as the resources "utilized in the [best] combination." (Section 103(c).)
2. Each program considers, to some extent, itself more important than the other multiple uses.
3. Each administration defines "multiple use" to support its preferences. It may be fair to say that:
 - a. The Carter Administration (Interior Secretary Andrus/BLM Director Gregg) considered multiple

use to give more emphasis to concerns such as wilderness, recreation, and protection.

- b. The Reagan Administration (Secretaries Watt and Hodel/ Director Burford) believes multiple use gives more emphasis to the traditional consumptive uses, such as energy and minerals development, livestock grazing, and timbering.
- c. Each administration has claimed it is restoring "balance" to the concept of multiple use.

4. Sally Ranney asserts the word "use" too much implies consumption, and that the concept should be expanded to that of "multiple-value lands," i.e., "to a breadth that encompasses both the tangible and intangible worth of resources" on the public lands. (Final Report, The President's Commission on Americans Outdoors, p. 181, 1987.)

5. Whatever the assertions of political administrations, the concept and ingredients of multiple use will be primarily influenced by needs and demands of the American public. An inevitable shift to "recreation," broadly defined to include scenic, cultural and wilderness is now underway, and a decline in traditional uses of public lands.

D. Overall, BLM reflects simultaneously the concepts of "collection of resources," "multi-disciplinary," and "interdisciplinary," with feeble moves toward what might be called "trans-disciplinary" in which resource programs are fully integrated.

III. CONGRESS DECLARED THAT BLM WILL PUT THE CONCEPT OF MULTIPLE USE INTO PRACTICE THROUGH LAND USE PLANNING.

A. The public interest will best be realized if the public lands and their resources are periodically and systematically inventoried and their present and future use is projected through a land use planning process coordinated with other Federal and state planning efforts. (FLPMA, Section 102(a)(2).)

B. The first substantive section of FLPMA is devoted to land use planning. The heart of our mandate requires the Secretary [from Section 202(c), edited in concise form, with underscoring added] to:

- (1) observe principles of multiple use and sustained yield;
- (2) use a systematic interdisciplinary approach;
- (3) give priority to areas of critical environmental concern;
- (4) rely on the inventory of public lands, resources and values;
- (5) consider present & potential uses of public lands;
- (6) consider the relative scarcity of values involved;
- (7) weigh long-term against short-term benefits;
- (8) comply with applicable pollution control laws; and
- (9) be consistent with State and local plans.

C. The Congress, however, did not mandate the type or name of the multiple-use land use planning system for BLM to use. BLM invented a process called "Resource Management Planning."

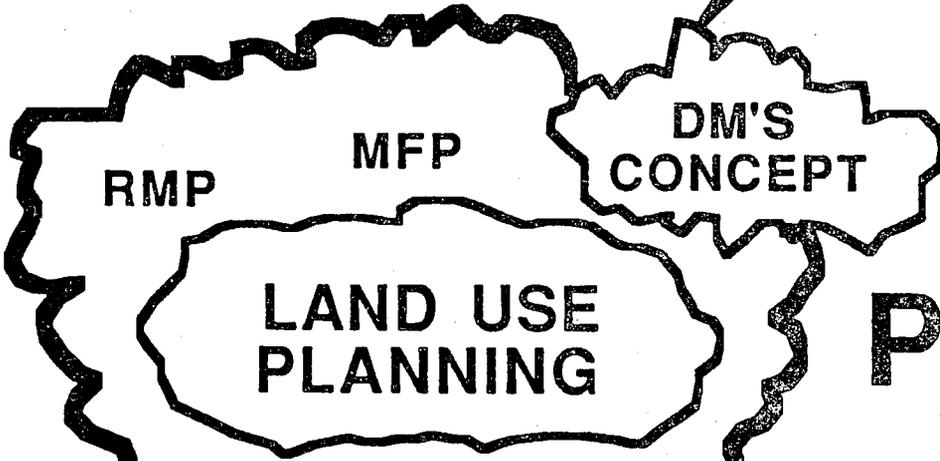
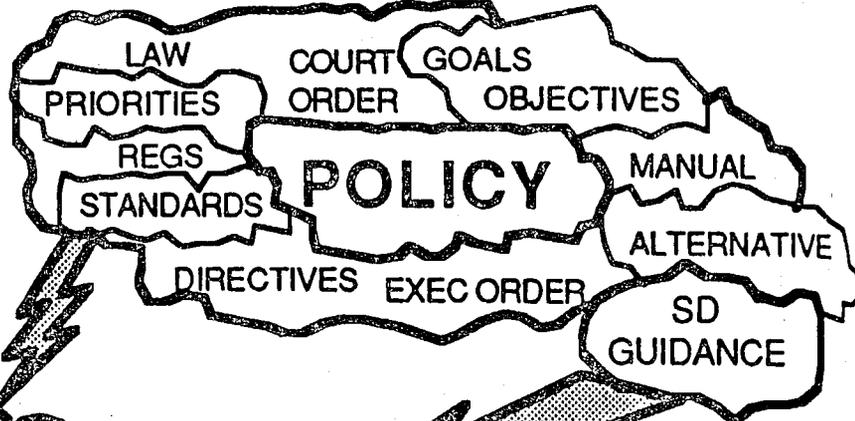
- D. We focus here on the middle tier - Resource Management Plans (RMPs) - of the Bureau's planning system.
1. The top tier is "national policy," which is traditionally unstructured.
 2. The third tier is more detailed planning, especially "activity plans," such as allotment or habitat management plans. (See Figure 1)
- E. Three basic decisions set the framework for developing the regulations in 1979 to implement the Planning process (43 CFR 1600):
1. The old advocacy process resulting in Management Framework Plans would be scrapped (though existing plans would be retained);
 2. The regulation writing team would work with FLPMA in one hand and NEPA in the other, i.e., Resource Management Planning would fully integrate planning and environmental processes; and
 3. The eight planning actions required in preparation (and the one for maintenance) would be the same for BLM and the Forest Service, which was writing regulations under the National Forest Management Act of 1976 (16 U.S.C. 1600) on the same schedule.
 - a. The intent was to allow joint planning (never realized) and promote common public understanding of both systems (under-realized).
 - b. As conceptualized by BLM, this nine step process is as rational as it is possible to get in Federal regulations (see Figure 2).

OVERHEAD
TRANSPARENCY

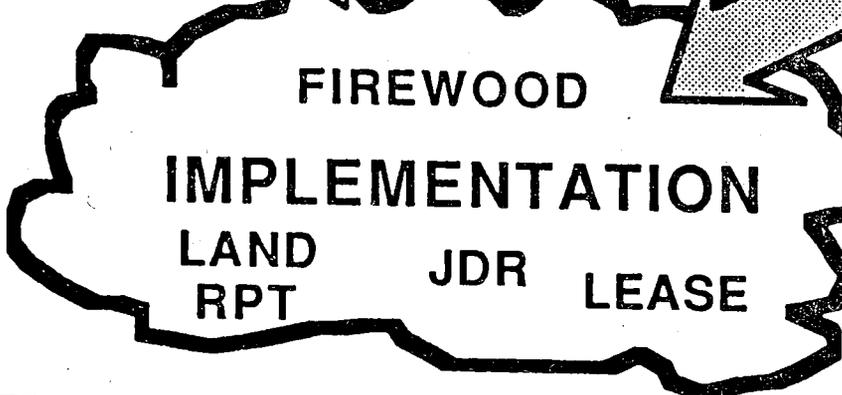
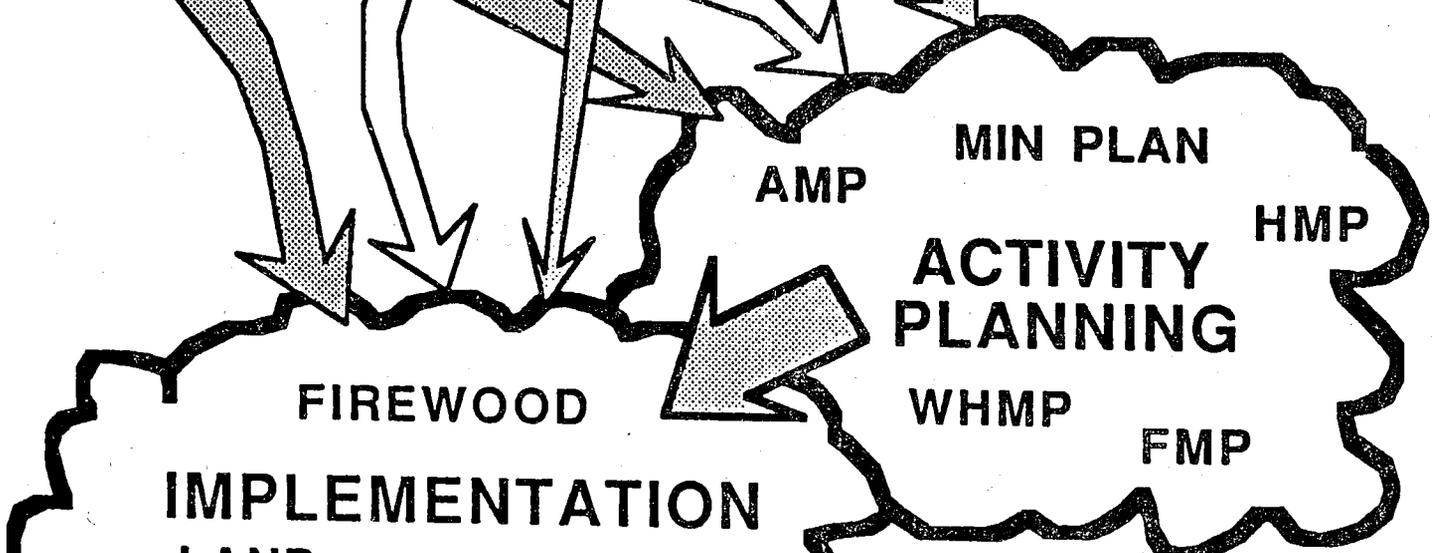
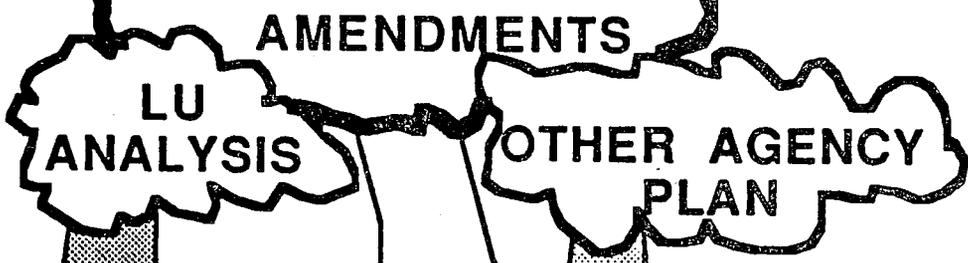
2

THE PLANNING TIERS

BLM
PLANNING SYSTEM



PLANNING
TIERS



OVERHEAD 2.1

THE PLANNER'S TOOLBOX

BUILDING IN QUALITY

PREPLANNING CONTRACT

OVERHEAD
TRANSPARENCY

6

THINKING THROUGH THE PLANNING PROCESS

LOGIC

WHAT IS THE PROBLEM?



WHAT IS OUT THERE
NOW?



WHAT ARE THE OPTIONS?



MAKE THE BEST CHOICE.



GO WITH IT!



KEEP PLAN CURRENT!

RMP PROCESS STEPS

- PREPLANNING CONTRACT
- ISSUE NOTICE OF INTENT
- ISSUE IDENTIFICATION
- PLANNING CRITERIA
 - ANNOUNCE AVAILABILITY OF PC
- INVENTORY/DATA COLLECTION
- ANALYSIS OF THE MANAGEMENT SITUATION
 -
- ALTERNATIVE FORMULATION
 -
- ESTIMATION OF EFFECTS
- SELECT THE PREFERRED ALTERNATIVE
 - PUBLISH DRAFT RMP/
DRAFT EIS
- SELECT R.M.P.
 - PUBLISH PROPOSED RMP/
FINAL EIS
 - RESOLVE PROTESTS
 - PUBLISH ARMP/ROD
 - IMPLEMENT ARMP
- MONITOR AND EVALUATE
 - PLAN MODIFICATION

E. To the extent that Resource Management Planning is working in BLM, it is because this extreme rationality -- largely derived from NEPA -- has been "bounded" or tempered by BLM's approach to implement it:

1. RMPs are issue driven, i.e., they are initiated only when decisions need to be made that are not taken care of by an existing plan.
2. While the RMP is a comprehensive plan, covering all the resources in the area, more analytical attention is given the resources involved in the identified issues.
3. BLM Planning is totally decentralized. RMPs are generally done for individual resource areas. New planning teams are created for each plan.

F. In 1981, new Director Bob Burford set up a task force to streamline the Planning Regulations. Real changes were basically a fine-tuning (though very helpful to managers and planners) because Burford laid out four "givens":

1. BLM would continue using the RMP process;
2. The nine action steps would remain the same;
3. Public participation cannot be reduced; and
4. Funding for planning will be greatly reduced.

[Note the author of this paper was chairman of this planning regulation task force.]

G. The most important changes were done internally, by top manager and the Planning staff, in setting out several important themes:

1. Most important is that -- Plans are Action Oriented: The purpose of Planning is to Aid Managers in Making Decisions.
2. The Manager, then, is the Key Planner.
3. Planning is focused on the Decisions to be Made.
4. Quality must be Built In from the Beginning.
5. Start at the End -- Consider How You Will Use the Plan.
6. No Division between Planning and Environmental.
7. All Issues are ultimately Social and Economic.
8. Plans Must Be Consistent with State and Local Plans.
9. Planning must be Linked to other BLM Decision Processes.
10. Planning is a Learning, Sharing Experience.

IV. BLM PLANNING IS WORKING.

A. The primary conclusion of the Bureauwide 1984 Planning Evaluation is that Planning is useful to BLM Managers:

The RMP process is widely accepted by those responsible for developing and utilizing the process. They feel that the RMP process is more streamlined, that the planning steps allow for efficient data assembly and analysis and that the plan document is in more useable form. In addition, plans that are up to date are being used by managers. As a result, the team does not see the need for any major system changes to a process that is now accepted and in place. ("BLM Planning Evaluation," 4.)

- B. Since the approval of the first RMP, for the Glenwood Springs Resource Area in Colorado in January 1984, the Bureau has approved 42 RMPs, covering over 60 million acres. Excluding Alaska, 39 RMPs cover just over 50 million acres, or 29% of the public land.
- C. There have been NO lawsuits on any of the 42 Adopted RMPs, so all are fully useful as guides for resource management.
- D. Since 1981, the average time for preparing an RMP has been reduced from 4 - 5 years to 2 - 3 years.

V. PLANNING AND ENVIRONMENTAL PROCESSES ARE FULLY INTEGRATED.

- A. BLM made a policy call that every RMP is a significant Federal action requiring an EIS. (43 CFR 1601.0-6)
- B. The 9 RMP action steps meet the scoping, alternatives, impact, and public participation requirements of NEPA.
- C. The RMPs meet the EIS requirements for
 - 1. The grazing EIS court settlement (NRDC v. Morton, 1974) [the latest 49 grazing EISs, of 142 total, are in RMPs]; the last will be completed on schedule in 1988].
 - 2. The EIS requirements for Wilderness review; and
 - 3. The comprehensive land use planning requirement of the Federal Coal Leasing Act.
- D. Products of the integrated process are [FLPMA/NEPA]:
 - 1) The Draft RMP/Draft EIS;
 - 2) The Proposed RMP/Final EIS; and
 - 3) The Approved RMP/Record of Decision.

E. The branches of "planning coordination" and "environmental coordination" in the Washington Office were abolished, and those functions (plus inventory) merged into two client-oriented staffs, called "program coordination" and "field support."

VI. PUBLIC INVOLVEMENT IS BUILT INTO BLM PLANNING

- A. FLPMA requires, only in general terms, that "The Secretary shall, with public involvement and consistent with...this Act, develop, maintain, and, when appropriate, revise land use plans...Section 202(a).
- B. The more specific requirements for public participation in the plans come because the integration of FLPMA and NEPA discussed above, i.e., NEPA requires extensive public participation in the preparation of the Environmental Impact Statement.
- C. In the 1981 proposed streamlining of the Planning Regulations;
1. The Director's task force recommended that much of the procedural material on public participation be moved to the Planning Manual [43 CFR 1600], as most of the other procedures were being moved.
 2. Further, the task force recommended, since the detailed requirements were to implement NEPA, that the Bureau just refer to the regulations of the Council on Environmental Quality (CEQ).
 3. Of the 315 commentors on the proposed changes, 250 expressed opposition to these recommendations

(1 was in favor)! Comments overwhelmingly accused Secretary Watt of trying to keep the public out of planning. In truth, Watt never gave any direction to the task force about public participation.

4. A major worry of the commentators was that BLM would just adopt the CEQ regulations, and then Secretary Watt would try to change them to exclude the public without ever touching BLM planning regs.
5. In response to comments, Director Burford insisted that all provisions on public participation continue to be spelled out in the Planning Regulations.

D. A critical issue facing Planning in BLM is:

What do we really mean by "public participation?"

1. We have had thousands of people identify issues and comment on draft RMP/EISSs.
2. But R. W. Behan would argue that this is just "consultative" public participation. What we need is for managers to "adopt a style of interactive decision-making with their affected and interested parties." (Behan, "Multiple Use Management: Kudos and Caveats." p. 29, 1981.)
3. This style would allow managers and interested parties to bargain, give-and-take, compromise, and thus participate in the fashioning of an outcome everyone can tolerate. Behan concludes that: "Until your various publics are satisfied, you are not practicing good and legitimate multiple use management." (Behan, p. 33.)

4. There is increasing concern about the role of the public in developing BLM national policies, especially about Section 309(e) of FLPMA which states:

The Secretary shall establish procedures... to give ...governments and the public adequate notice and the opportunity to comment on the formulation of standards and criteria for, and participate in, the preparation and execution of plans and programs for, and the management of, the public lands.

5. The public has fully participated in comment on the Planning Regulations (as all BLM regulations) and the Supplemental Program Guidance to the Bureau's Planning Manual -- the first time BLM has solicited public review of a manual.
6. BLM, however, has never adopted procedures, as the Forest Service has, to implement Section 309(e).

VII. RESOURCE MANAGEMENT PLANS ARE CONSISTENT WITH STATE AND LOCAL PLANS

A. FLPMA requires that

Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this act. (Section 202(c).)

- B. In writing its Planning Regulations, BLM expanded on this to include State and local "policies and programs," as many local governments, especially counties, do not have land use plans. (43 CFR 1615.)
- C. To assure this consistency, BLM added a unique process for "Governor's review" in these 1983 amendments. (43 CFR 1615.24.)

1. After preparing the Proposed RMP/Final EIS, BLM sends the document to the State Governor for a 60-day review period.
 - a. The Governor acts on behalf of the State and its local governments, focusing the coordination in one office.
 - b. The 60-day period overlaps printing and the 30-day "protest" period, so no additional time is required.
 - c. Note that this procedure also applies to amendments to any RMP or existing Management Framework Plan.
2. The Governor may make a finding of "inconsistency" of the RMP with either State or local plans, or tell BLM that the RMP appears to be consistent.
 - a. There is a procedure for the Director, and if necessary the Secretary, to work out any inconsistencies.
 - b. The Bureau does not, by this, concede any loss of Federal authority over the making of land use allocation decisions.

VIII. THE PUBLIC MAY PROTEST APPROVAL OF THE RESOURCE MANAGEMENT PLAN

- A. The unique protest procedure is a BLM invention. (43 CFR 1610.5-2.)
 1. No requirement for a protest is made in FLPMA.
 2. BLM created this in the 1979 Planning Regulations.

- a. The District Manager signed the plan (with concurrence of the State Director).
- b. The protest process was therefore in two-steps: first to the State Director, then if unresolved to the Director.
- c. This process was changed in 1983, before any RMP was signed.

B. Since the approval of a plan is now done by the State Director, the protest is made only to the Director.

1. The State Director is asked for information on the protest, and asked to draft a possible reply.
2. The recommendation to the Director on resolution is made by the Chief of Planning in conjunction with appropriate resource staffs.

C. Protests in effect take the place of appeals on plans.

1. The Director's "decision" on a protest is the final decision of the Department of the Interior.
2. Adoption of a land use plan or amendment to a land use plan is not considered a "decision" appealable to the Interior Board of Land Appeals (IBLA).
 - a. IBLA rejects all attempts to appeal approval.
 - b. None of these has been taken to a lawsuit.
3. An action implementing a plan may be appealed to IBLA.

D. The protest experience has been a positive one for BLM.

1. Seven RMPs have had no protest at all.
2. The remaining 42 which have been completed (Proposed RMP/Final EIS) have generated 220 protests,

- an average of just over 5 per RMP.
3. All but 27 protests have been resolved (20 are on one recently completed RMP); the current backlog will be resolved in less than 90 days.
 4. The Director has basically upheld State Directors on judgments made in the plan, but has upheld protestors when the State Director did not follow the Planning Regulations or adequately document the reason for decisions.
 5. The most difficult protests to resolve have been in regard to giving priority to designation of Areas of Critical Environmental Concern (ACECs).

IX. BLM IS COORDINATING MORE CLOSELY WITH OTHER LAND MANAGEMENT AGENCIES

- A. As indicated above, BLM has for many years consulted with the Forest Service to coordinate planning:
 1. On writing regulations in 1979 and 1981-83;
 2. By the Deputy Director and Deputy Chief meeting regularly to discuss planning;
 3. Through BLM and Forest Service publishing joint planning schedules each year;
 4. However, no joint efforts on preparing new plans have occurred, except:
 - a. an attempt in Northeast California which bogged down on the differing schedules for inventory and public participation.

b. joint amendments to existing plans to consider a power line in New Mexico; the biggest difficulty relates to the differing processes for protests (BLM) or appeals (USFS) .

B. Coordination with the National Park Service has improved dramatically in the past two years.

1. Directors Burford and Mott signed a Memorandum of Understanding in January 1987:

a. The intent is to resolve problems by preventing them, or handling them before they need Secretarial intervention.

b. The two agencies exchange planning schedules.

c. The two Deputy Directors meet regularly to discuss planning and operational issues.

d. BLM State Directors and NPS Regional Directors are starting to meet to discuss planning schedules and issues.

2. The two agencies have prepared a joint study on how to manage the Hovenweep National Monument and adjacent areas, replacing an NPS study on how to expand the Monument.

3. They are also completing a joint study on how to respond to requests for national monuments on the public lands.

X. BLM PLANNING NOW CONTRASTS FAVORABLY TO PLANNING IN THE FOREST SERVICE

- A. Clearly, there are similarities between the BLM and Forest Service planning process and products.
1. The nine steps of the process are identical.
 2. Both place responsibility at the lowest field level for preparation of the plan; and at the highest field level for signing.
 3. Both have complete NEPA coverage of the plans but:
 - a. BLM integrates the RMP and EIS into one process/one document.
 - b. Forest Service ends up with two documents because it writes an EIS on its Plan.
- B. BLM creates new plans only when it needs to.
1. State Directors have to determine that issues require a plan, and existing plans (most often the MFP) aren't sufficient.
 2. BLM is not trying to do all its plans at once.
 - a. FS is trying to do all 123 Land Management Plans virtually simultaneously, under the requirements of the NFMA of 1976 calling for completion of LMPs by 1985.
 - b. BLM starts between 6 and 12 RMPs a year, depending on issues.
 3. BLM has no mandatory time deadline for revising RMPs or even replacing the older MFPs.
 - a. There is no time deadline given in FLPMA.
 - b. The requirement in the 1979 regulations for

- revision after 10 years was dropped in 1983.
- c. Our approach is to make amending a plan relatively easy so that plans are kept up-to-date.
 - d. These plans should not need revision.
 - e. Mandatory revision has a negative effect - managers and staff lose incentive to maintain a plan about to be wiped out.
 - f. Forest Service has a statutory requirement (NFMA) to replace all Land Management Plans within 10 to 15 years of adoption.
- C. BLM has no formal national plan or target which the field must meet.
- 1. The Forest Service sets targets for outputs through the Resource Planning Act plan and program required under NFMA.
 - 2. BLM gives limited guidance on process.
 - a. Local situations dictate an appropriate plan.
 - b. FS guidance is extensive and detailed; LMPs will look very much the same.
- D. Only BLM has the advantage of being able to create and manage Areas of Critical Environmental Concern.
- 1. ACECs provide managers, in the planning process, with a tool to give special attention to (usually smaller) multiple use areas, solving problems of potential conflict between development and protection of environmental and sensitive values.
 - 2. BLM does not have to use wilderness or withdrawal to accomplish these objectives.

- E. BLM has kept its protest process within the Bureau.
 - 1. BLM created a new process which is distinct from the Department of the Interior's appeals process.
 - a. BLM hears a protest on a proposed decision; this protest is resolved before the Bureau has formally committed itself.
 - b. The Director's decision is the final decision of the Department.
 - c. There is no appeal to IBLA or the Secretary.
 - 2. The Forest Service elected to use the standard appeals process of the Department of Agriculture.
 - a. FS makes the decision on the plan and it is signed by the Regional Forester; the appeal is on a decision already made.
 - b. The FS process is much more legalistic, e.g, ex parte rules apply where they don't in BLM.
 - c. A dissatisfied appellant may seek redress with the Assistant Secretary of Agriculture, who chooses whether or not to accept the plea.
(If accepted, it's usually bad for the FS.)
- F. BLM has reduced the cost of preparing a land use plan.
 - 1. The average cost for a RMP declined between 1980 and 1986 by 40% - from \$667,000 to about \$450,000.
 - 2. At the same time, RMPs absorbed the requirements for grazing EISS, saving an average of \$300,000 per EIS [the 50 incorporated saved BLM \$15 M].
 - 3. For the new Western Oregon RMPs BLM is incorporating Timber Management Plans for further savings.

4. All planning/NEPA requirements for oil and gas leasing are being included in the RMP, eliminating the need for umbrella EAs.
 5. Forest Service LMPs, as currently being completed, will require further work to prepare and adopt their Timber Management Plans, and the necessary environmental assessment for leasing of oil & gas.
 6. The FS spent \$2.1 million and \$2.4 million on two Idaho Land Management Plans, just to get them to draft. (General Accounting Office, "Forest Planning Costs at the Boise and Clearwater National Forests in Idaho," October 31, 1986.)
- G. BLM is running well on schedule on its new RMPs.
1. BLM approved its first RMP two years before the FS fully approved its first Land Management Plan.
 2. 42 RMPs are fully approved and are being used.
 3. The Forest Service has 21 Land Management Plans approved, with all appeals and stays resolved.
 4. BLM is scheduled to approve 11 more RMPs in 1987.
 5. By 1992, 110 resource areas of 140 outside Alaska will have approved RMPs.

CONCLUSION

The Bureau of Land Management did not arrive at this position just through deliberation. It is a product of the Bureau's culture -- and its poverty, its status as the manager of the "Lands That Nobody Wanted."

Our bias, then, is for "getting on with it," for trying out something, and then correcting our mistakes. Our plans are getting better, and we have an easy method for going back and improving the plans we have already done. We will continue to experiment, to adjust, to amend, to improve.

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