

Wild & scenic rivers resource center

BLM management plans

September 2016

Use plans to protect rivers

In a nation of highly developed working rivers, a vigorous effort to protect remaining intact, healthy rivers and stream corridors is essential and always timely.

While the best-known and most enduring method of protecting rivers is congressional designation of rivers into the *National Wild and Scenic Rivers System*, we can also secure more immediate administrative protections through federal land management plans.

The revision or update of these plans is your cue for action.

The Bureau of Land Management's management plan revision process involves four basic phases:

Scoping

- planning assessment
 - information gathering
 - evaluation of information quality
 - assessment of baseline condition
 - summary report
- identify management issues, disputes, controversies, opportunities
- preliminary alternatives

Draft management plan

- preliminary alternatives (further refined)
- public comment

Proposed management plan

- protest period

Decision (final plan)

For details, read on...

NOTE that the BLM approved, in late 2016, a new rule guiding its land management plans revision process. On March 7, 2017 the U.S. Congress rejected that rule.

All BLM planning is now again guided by the 1983 BLM planning rule (which was applicable to most plan revision processes that had already begun). The following information reflects the provisions of that earlier rule.

BLM plans, and how to influence them

Scoping

1) Pre-planning – Before the formal plan revision begins, the agency typically prepares a preliminary list and schedule of key components of the planning process, including:

- purpose and need for the revision
- background information on current conditions and desired future conditions
- stakeholders to engage, some informal meetings
- calendar for the plan revision

Rivers-specific: This phase (or the scoping phase, below) is typically the time when the agency prepares its inventory or list of potential wild and scenic rivers, to be studied during the plan revision.

2) Scoping and planning criteria – Similar to, and overlapping a bit with, the pre-planning phase, this is a more formal invitation to comment on issues, places, values, and policies that should be considered in the plan revision.

Rivers-specific: If not completed already, the agency will prepare its inventory or list of potential wild and scenic rivers to be studied.

3) Inventory and data collection – This generally agency-internal review collects data and information regarding resource, environmental, social, economic, and institutional aspects of the planning area and of the pending plan revision. revision.

Among other things, this assessment must be heavily founded in the best available scientific information. Some of this information may be gathered by the agency, but other details and interpretation can and

should come from interested groups and advocates.

Insist that the agency provide details of its analyses during this phase—what data and other information was used in reaching conclusions, w&s eligibility *e.g.*

Press for detailed description and documentation of river values identified (in w&s eligibility report *e.g.*)—specific features, species, and activities rather than the generalized eligibility categories often used in eligibility reports: recreation, geology, vegetation *e.g.*—and submit your own details.

4) Analysis of management situation – Basically an analysis of the data collected in step 3), this is a of current land conditions *vis a vis* current management, plus a preliminary analysis of how the land might respond to trending issues and policy decisions to be made in the plan revision.

Rivers-specific: Unless completed earlier, the agency will publish its wild and scenic eligibility report about this time, in draft and final forms.

5) Wild and scenic rivers analysis – Typically, BLM field offices will undertake a separate analysis of potential wild and scenic rivers, parallel to and informing the management plan revision process. This usually includes two or three basic stages, if they haven't been presented earlier:

- a) list or **inventory of rivers** to be studied—preliminary and final;
- b) the agency publishes its **eligibility report**—in draft and/or final form—presenting rivers that meet the basic criteria of being free-flowing and including

BLM plans, and how to influence them, p. 2

at least one outstandingly remarkable value, plus a preliminary classification of each stream segment as wild, scenic, or recreational;

c) the agency publishes a draft **suitability report**, including rivers that meet the additional criteria for suitability.

Rivers-specific: Respond in detail to any public comment opportunity provided, including review of the preliminary list (recommend additional rivers or river segments, with documentation of unique values), and critique of the eligibility report (being sure it includes all appropriate rivers and values, and that it thoroughly and accurately describes and documents the river values).

Opportunities to comment on the draft suitability report are usual incorporated into comment periods addressing the full draft RMP, another essential time to make your case for rivers wild-and-scenic status and protection.

6) Range of alternatives – Required under the *National Environmental Policy Act* (as part of the environmental impact statement that accompanies the plan revision), this step outlines a general range of comparative approaches for the revised plan. Typically this includes one alternative with an emphasis on development and resource extraction, one with an emphasis on resource and environmental protection, one with little or no change from the current plan, plus one or more others along that spectrum.

Rivers-specific: If the agency invites comment on the range of alternatives, submit comments supporting inclusion of specific high-value rivers in at least one

alternative; press for adjustments if key rivers are not included.

7) Environmental Impact Statement – Integrated among the various phases of the plan revision process are comment periods on the environmental impact statement (EIS) addressing the proposed plan and alternatives, as required under the *National Environmental Policy Act* (NEPA)—in draft, then final form. Many of the details of the proposed plan will be found in the EIS and its appendices.

8) Estimate effects of each alternative – The agency prepares a preliminary projection of the effects that each of the alternatives (from step 6) will have on the land and its resources.

BLM plans, and how influence them, p. 3

Draft management plan

9) Draft management plan (and draft environmental impact statement), with w&s suitability analysis – This very important document compiles all the outreach, research, data, and analyses that have been completed so far, providing very detailed assessment of the effects of each alternative. They agency usually identifies its preferred alternative at this stage.

Rivers-specific: The draft plan includes (typically as an appendix to the draft EIS) a draft wild and scenic suitability determination. The draft plan alternatives will also include variations on instructions for managing study rivers, including rivers determined suitable or, sometimes, as measures substituting for suitability.

Support the alternative, or portions of alternatives, that include the best list rivers as eligible and suitable, that provide the most effective and reliable protections for eligible and suitable rivers, and that provide the most effective and reliable protections for rivers and river corridors in general.

Proposed plan

10) Proposed plan – Based in part on comments submitted on the draft plan, the agency publishes its proposal for a final revised management plan. Individual citizens and groups now have opportunity to submit protests of the proposed plan or (more typically) of select portions of it. The state's governor also has opportunity to comment on the proposed plan.

The agency can choose to alter the proposal or to otherwise respond to the protests and comments.

Rivers-specific: The proposed plan will include, typically as an appendix to the

final EIS, a final wild and scenic suitability determination for rivers studied; river advocates should support or protest specific suitability decisions accordingly. Specifically use access to governor and to other cooperating agencies with review opportunity at this phase.

Final plan

11) Final plan and record of decision – In this final step of the plan-preparation process, the agency publishes the official final plan, which will guide land management for the next fifteen years or so.

- **Rivers-specific:** This will include the final w&s suitability determination.

12) During the life of the final plan, the BLM—either of its own accord or in response to public requests—is obliged to continue implementing, monitoring, and evaluating the new plan; the BLM can maintain, amend, or revise select portions of the plan.

Rivers-specific: During the life of the plan (under either rule), continuing monitoring of rivers is important a) to be sure that river-specific provisions are being fulfilled and b) to speak up if the plan proves inadequate to proper protection of priority rivers.

