

**Nomination Received by Council on Environmental Quality, Executive Office of the President
For the CEQ NEPA Pilot Project Program**
<http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/nepa-pilot-project-nominations>

PART I. NOMINATOR

First Name:	Victoria
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Organization:	DOI - BLM
Project Title:	[None submitted]
Submitted by:	Federal Agency
Date Received:	05/09/2011

PART II. SHORT ANSWERS

I. What Federal agency or agencies will be involved in this pilot project?

Any agency requiring NEPA EAs for improving land conditions when managing public lands.

II. What is the Federal action to which this NEPA pilot project applies?

The federal action is for preparing, analyzing, and authorization of actions designed to improve rangeland conditions. This pilot project is for EA's with projects proposing rangeland improvements to enhance watershed conditions at an allotment level, with projects implemented in stages (1 to 10 years). Static supporting information relevant to affected resources having direct, indirect, or cumulative impacts addressed in the EA would be either accessible to the reader via appendices, or on the agency website.

III. How will this pilot project reduce the costs and time needed to complete the NEPA process?

Districts will be able to complete Static Resource Reports (SRRs) that are specifically related to their district. The SRRs will eliminate the need for specialists restating in each EA about the static conditions of their district. Both time and funds necessary for completing an EA will be realized by agencies, and by the public for review. Analyzing multiple areas in need of range land improvements would be provided within one EA for projects within an allotment, to be implemented over a 10-year timeframe.

IV. How will this pilot project ensure rigorous environmental protection?

Establishing and providing SRRs within each district, and preparing EAs that address larger areas within an area (i.e. an allotment) will allow specialists to focus on analysis and professional predictions for their resource as it would be impacted (compared to baseline) by a proposed activity. Saved time would allow specialists to analyze more EAs. Planning for projects within an upcoming decade will allow for better planning and budgeting.

V. How will this pilot project improve the quality and transparency of agency decisionmaking?

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Out-reach to community members for their input on potential areas in need of rangeland improvements provides opportunity to build trust with an agency, and relationships between specialists and public participants. Designing EA's with allotment focus will encourage involvement by members affected in the community, as well as opening communication between all individuals for brainstorming on methods most conducive to rangeland improvement.

VI. Will this pilot project develop best practices that can be replicated by other agencies or applied to other Federal actions or programs? Please describe?

**"-All agencies working on or with public lands would be able to refer (via reference to a specific SRR) readers to topics that relate specifically to their district environment, such as:
-climate change predictions within a district
-local vegetation (in"**

PART III. PROJECT DESCRIPTION

(See attachment on following page.)

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Planning and Environmental Coordinator

NEPA Pilot Program Narrative

BLM – Nevada, Elko District



BLM Mission Statement

Sustain the health, diversity and productivity of public lands for the use and enjoyment of present and future generations.

NEPA directive (Section 1508.9(a)) through CEQ question 36(a) states an EA should be a concise document that 1) briefly describes analysis to suggest whether or not an EIS is needed, 2) helps to identify alternatives and mitigation measures, and 3) facilitates preparation for an EIS, if needed. The ideal length suggested for an EA without significant impacts is 10-15 pages. Projects proposed to enhance riparian and landscape conditions, which are not expected to have adverse impacts cannot be adequately defended in a 10-15 page document today (2011) because of several reasons, two of which would be addressed with this pilot project:

- Need to adequately describe the affected environment with regards to deviation from historical trends along with predicted assumptions (i.e. climate change), landscape use (expanding WUI environments), impacts created from wildfires (past, areas in recovery, or for future fires), etc.

-Public land management agencies, in order to inform the public as much as possible, and to avoid litigation from appeals, try to address and restate much of the same information for each EA within a specific area.

Additionally, agency specialists are hesitant to separate historical or scientific predictions (i.e. climate change) that are restated often in an EA because of the high probability that such an action would identify a “fatal flaw,” thus causing project progression to halt. Efforts made by agency specialists to create *Static Resource Reports* (SRR) for topics that specifically address issues relevant to a district, and that are available to the public in an EA appendix or on the agency website, will allow:

- Specialists to concentrate on how a proposed activity will impact their resource, as it applies on their district (stated within a SRR), with direct, indirect, and cumulative impacts.
- SRRs, updated as needed when trends or other changes occur, will allow public members to verify that all resources which could be impacted are addressed in an EA.
- SRRs posted on an agency website will considerably reduce the size of an EA, as opposed to those placed in an appendix; the latter of which may be needed for members that do not have computer access.

The first step in bringing this pilot project into fruition would be to create SRRs on issues relevant to a district, i.e. climate change, wildfire history, vegetation and wildlife (with regards to typical species present, threatened or endangered species, special status species, and invasive or exotic plant species), identifying past, present, and future projects on a district, and stating

current socio-economic and cultural concerns. Resources needed to facilitate this process would include literature research or other sources to complete relevant SRRs for a district. Once this process is completed, specialists would state in an EA how their resource (as stated in the SRR) would be impacted by a proposed activity. Creating SRRs would require effort/time for specific specialists to write or edit local conditions. BLM-Elko has an example of one SRR for climate change predictions applicable to the Elko area, including the Tuscarora and Wells Field Offices.

Following the creation of relevant SRRs, specialists and public would meet to discuss, identify, and rate sites within allotments that are in most need of enhancement, especially where water sources are diminishing. Resources needed include: out-reach efforts to public members who are interested in participating, specialists and public relaying known areas in need of enhancement, establishing a ranking process to identify areas in need, from sites that can wait to those needing immediate attention.

The last step is to begin EA assessments for allotments with areas in immediate need of attention, and also allowing for future improvements to occur within the next decade as well as allowing for priority changes in the event of unexpected events (wildfire), budget constraints, or unanticipated funding availability.

Most importantly, the pilot project will require authorization and support from CEQ and NEPA administrators to acknowledge that rangeland improvement EA's can refer readers to either an appendix or an agency website to view relevant resource information.

For an example, or other information, feel free to contact:

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