

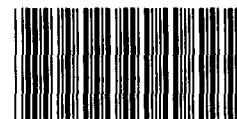
GAO

Report to the Chairman, Subcommittee  
on National Parks and Public Lands,  
Committee on Interior and Insular  
Affairs, House of Representatives

September 1990

PUBLIC LANDS

Limited Progress in  
Resource Management  
Planning



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United States  
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Washington, D.C. 20548

**Resources, Community, and  
Economic Development Division**

B-235947

September 27, 1990

The Honorable Bruce F. Vento  
Chairman, Subcommittee on National  
Parks and Public Lands  
Committee on Interior and Insular Affairs  
House of Representatives

Dear Mr. Chairman:

This report responds to your request that we review the progress the Department of the Interior's Bureau of Land Management is making in developing and implementing land-use plans and in designating areas of critical environmental concern.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will send copies to the Secretary of the Interior and other interested parties. We will make copies available to others upon request.

This report was prepared under the direction of James Duffus III, Director, Natural Resources Management Issues, (202) 275-7756. Other major contributors are listed in appendix II.

Sincerely yours,

A handwritten signature in cursive script, appearing to read 'J. Dexter Peach'.

J. Dexter Peach  
Assistant Comptroller General

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# Executive Summary

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## Purpose

The Department of the Interior's Bureau of Land Management administers 270 million acres of federally owned lands. These areas, called the "public lands" contain many resources including minerals, timber, rangeland, fish and wildlife habitat, recreation areas, and cultural and historic sites.

The Bureau prepares resource management plans to guide the management and use of these lands. The plans are important because they are the mechanism for resolving conflicts among the multiple uses of the lands, for ensuring that the lands can be used currently and are also being preserved for future generations, and for designating and protecting areas of critical environmental concern (ACEC).

The Chairman, Subcommittee on National Parks and Public Lands, House Committee on Interior and Insular Affairs, asked GAO to review (1) the Bureau's progress in completing resource management plans, (2) whether the plans contain measurable goals and milestones, and (3) the Bureau's progress in designating and protecting ACECS.

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## Background

Before passage of the Federal Land Policy and Management Act of 1976 (FLPMA), the Bureau managed the public lands custodially, pending their transfer to other federal agencies, states, or private ownership. Under these circumstances, there was little need for comprehensive land-use plans. In 1976, however, FLPMA dramatically revised the federal government's policy on the ownership and management of the public lands, by directing that they generally be retained in federal ownership and requiring that land-use plans (resource management plans) be developed and used to guide the management of the public lands.

FLPMA also directed that the planning process give priority to the identification, designation, and protection of ACECS—areas where special management is required to (1) protect and prevent irreparable damage to important historic, cultural, or scenic sites; fish and wildlife resources; or other natural systems or processes or (2) protect the public's life and ensure its safety from natural hazards.

The Bureau intends to prepare 136 resource management plans for the public lands. More than 99 percent of these lands are located in the 11 contiguous states that include or are west of the Rocky Mountains and Alaska. For example, 69 percent of the total land area of Nevada is under the Bureau's jurisdiction.

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## Results in Brief

Over 13 years after FLPMA was enacted, the Bureau has completed less than half of the 136 resource management plans needed to guide the management of the public lands. The Bureau estimates it will complete all 136 plans by 1997.

The planned goals and decisions of those plans completed are of limited practical value unless the Bureau converts the goals and decisions into on-the-ground actions. GAO found that the Bureau had made limited progress in implementing its completed plans. GAO found that specific details that are needed to implement plan goals and decisions typically had not been developed, scheduled, tracked, or linked to the budgetary resources necessary to carry them out. In July 1990, the Bureau issued instructions to its field offices that, if properly implemented, should address the scheduling, tracking, and budget linkage problems identified by GAO. Because of the importance of a scheduling, tracking, and budget linkage system to convert plan goals and decisions into on-the-ground actions, GAO believes that the Bureau needs to closely monitor its field offices' implementation of its July 1990 instructions.

Although FLPMA directed that the Bureau give priority to designating and protecting ACECS, GAO found that the Bureau has given its field office managers broad discretion in making decisions on these areas. In turn, Bureau field office managers have used this broad discretion in conjunction with their own philosophical views to make inconsistent ACEC designation decisions. In fact, ACECS were not even singled out as a planning issue in some of the plans GAO reviewed. Without requiring that ACECS be considered in the planning process and without monitoring of the ACEC decision-making process by the Bureau's headquarters, GAO believes the potential exists for continued inconsistencies in the future.

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## Principal Findings

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### Less Than Half the Plans Are Completed

Over 13 years after the law that required them, the Bureau has completed only 63 of the 136 resource management plans for the public lands. Another 42 plans were under development, and work has not started on the remaining 31 plans. Between 1976 and 1980, the Bureau developed planning regulations and initiated a number of pilot plans. From fiscal year 1980 through fiscal year 1989, the Bureau has been initiating work on an average of nine new plans per year.

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During the 1980s, the Bureau faced budget and staffing cutbacks that hampered its ability to complete resource management plans. For example, from fiscal years 1981 to 1989, the Bureau's planning staff was reduced by about 50 percent. The Bureau estimates that all plans will be completed by 1997.

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### Limited Implementation of Completed Plans

When completed, the plans are to prescribe the goals and decisions for management of the public lands. However, for many of the goals and decisions, the completion of the resource management plan is not an end, but rather a beginning. The plans are typically general in nature, and while providing a framework for managing the public lands, additional steps are often needed to convert the goals and decisions contained in the plans into on-the-ground actions. GAO found that additional steps including preparing project-specific plans, scheduling when actions will take place, linking implementation actions to the budgetary process, and tracking progress made had often not been accomplished for the completed plans it reviewed. For example, a goal of ensuring that wildlife have adequate habitat has limited value if it does not identify the wildlife species or geographical areas involved or the specifics of how or when the goal will be achieved. During its review, GAO discussed the need for a management control system for implementing completed plans with Bureau officials. Subsequently, in July 1990, the Bureau issued instructions requiring its field offices to: (1) prepare a plan implementation schedule no later than 90 days after plan approval, (2) link plan implementation schedules to the budgetary process, and (3) track and document progress in implementing the plans.

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### Inconsistent Designation of Areas of Critical Environmental Concern

FLPMA directed the Bureau to give priority to the designation and protection of ACECS in the land-use planning process. GAO found, however, that the implementation of this legislative mandate has been inconsistently applied. For example, 7 of the 14 plans GAO reviewed had not even identified ACECS as a planning issue. The Bureau's guidelines implementing the ACEC concept give its field office managers broad discretion in designating sites on the public lands as ACECS.

GAO found that decisions on designating important areas of the public land as ACECS were substantially dependent on the philosophical views of Bureau field managers, which varied considerably, resulting in widely disparate ACEC designation decisions. For example, GAO found that one of the Bureau's field offices had designated a western juniper/

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sagebrush plant community as an ACEC, even though such plant communities are considered common throughout many parts of the western United States. In contrast, GAO found that another Bureau field office had not designated a unique paleontological site as an ACEC. The site contains foot tracks of pterodactyls, a form of flying reptile that became extinct millions of years ago and is one of only four such sites that have been discovered in the world.

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## Recommendations

GAO recommends that the Secretary of the Interior instruct the Director, Bureau of Land Management, to

- closely monitor the implementation of its July 1990 resource management plan instructions by the Bureau's field offices and
- require that ACECS be specifically addressed and documented in the resource management planning process, monitor the Bureau field offices' application of ACEC guidance to achieve greater consistency among the Bureau's offices, and ensure that eligible areas of the public lands are designated and protected as ACECS.

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## Agency Comments

GAO met with the Department of the Interior's Deputy Assistant Secretary for Land and Minerals Management to obtain oral comments on this report. The Deputy Assistant Secretary told GAO that he agrees with the report's findings, conclusions, and recommendations. However, as requested, GAO did not obtain written agency comments on this report.

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**Abbreviations**

ACEC	area of critical environmental concern
EIS	Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
GAO	General Accounting Office

# Introduction

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The total land area of the United States is 2.3 billion acres. Approximately one-third of this total, or 724 million acres, is owned by the federal government. The Department of the Interior's Bureau of Land Management is responsible for managing 270 of the 724 million acres, including 176 million acres in 11 western states and 93 million acres in Alaska. The remaining 1 million acres under the Bureau's jurisdiction are scattered throughout the country. The lands managed by the Bureau contain many valuable resources including rangeland; timber; minerals; watersheds; wildlife; fish; and scenic, cultural, recreational, and historic sites. They represent a significant resource for the use and enjoyment of present and future generations of Americans.

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## Background on the Bureau and Its Management of the Public Lands

In July 1946, the Bureau of Land Management was established by consolidating two existing federal agencies—the Grazing Service and the General Land Office. The Bureau is responsible for administering federal lands that have not been set aside for specific uses, such as national forests, national parks, national monuments, wildlife refuges, and defense installations. The federal lands managed by the Bureau are commonly referred to as the “public lands.”

The public lands represent significant portions of several of the 11 western states, including 69 percent of Nevada, 42 percent of Utah, and 30 percent of Wyoming. The Bureau has divided the public lands, generally along state and county boundaries and natural geographic features such as mountains and rivers, into separate resource areas. The Bureau's field operations are managed by state offices, district offices, and resource area offices. Each of the Bureau's 12 state offices is managed by a state director. State offices are responsible for providing statewide program direction, oversight, and coordination of resource programs for federal lands under the Bureau's jurisdiction. Each state office has several district offices, each of which is managed by a district manager. District offices provide their resource area offices with oversight and support. Resource area offices, each of which is managed by a resource area manager, are the primary field locations responsible for the day-to-day management of the public lands.

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## FLPMA Revised Policy on Ownership and Management of the Public Lands

Before the Federal Land Policy and Management Act of 1976 (FLPMA) was passed, the Bureau managed the public lands custodially, pending their transfer to other federal agencies, states, or private ownership. Recognizing the value of the public lands to present and future generations of Americans, FLPMA established new policies and management objectives governing the public lands, including the following:

- Public lands would be retained in federal ownership.
- Resources would be periodically and systematically inventoried.
- Management would be on the basis of multiple use<sup>1</sup> and sustained yield.<sup>2</sup>
- Areas of critical environmental concern (ACEC) would be protected.

To implement this policy, FLPMA called for the development and use of land-use plans for the management of the public lands and identified six major land uses—livestock grazing, fish and wildlife development and utilization, mineral exploration and production, rights-of-way, outdoor recreation, and timber production.

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## Resource Management Planning Process

In the late 1960s, recognizing the need for land-use planning to guide the management of the public lands, the Bureau started to develop management framework plans. These plans contained broad guidance for the management of the public lands. When FLPMA required the development of comprehensive land-use plans, the Bureau initiated a new planning system that results in resource management plans. As designed, resource management plans include a number of steps that were not specifically required under the management framework planning process. Resource management plans have the following characteristics:

- They are prepared in conjunction with an environmental impact statement (EIS).
- They include a formal process for public participation.
- They deal specifically with resource conflicts.
- They are consolidated in one document.
- They are to address ACECS as a priority matter.

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<sup>1</sup>Multiple-use management means management of the public lands and their various resources, such as range, fish and wildlife, minerals, recreation, and timber, so that they are used in the combination that will best meet present and future public needs.

<sup>2</sup>Sustained-yield management means achieving and maintaining in perpetuity a high level of annual or regular periodic output of the various renewable resources of the public lands consistent with multiple use.

Essentially, the Bureau is preparing separate plans to cover the management of public lands in each resource area. There are exceptions, such as in Oregon, where, because resource areas are often small in size, one plan may cover as many as five resource areas. In total, the Bureau intends to prepare 136 plans to cover all the public lands.

To complete a plan, the Bureau has established a nine-step resource management-planning process that takes several years to complete. For example, the initial seven plans completed in Colorado took an average of 39 months to prepare. Seven to 24 additional months were needed to resolve protests before the plans were finally approved. Table 1.1 shows the nine steps in the Bureau's planning process.

**Table 1.1: The Bureau's Resource Management Planning Process**

Step	Description
Identify issues	Solicit information from the public, industry, and government to identify issues or land-use problems, concerns, and conflicts
Develop planning criteria	State the limits of what will or will not be considered during the planning process
Collect inventory data and information	Gather existing inventories and other data and identify other information to fill critical information gaps
Analyze the management situation	Analyze inventory information in terms of the planning issues and management concerns being addressed in the plan
Formulate alternatives	Develop a range of combinations of resource uses and management practices that respond to the planning issues
Estimate effects of alternatives	Compare and evaluate impacts of each alternative on the environment
Select the preferred alternative	Recommend the alternative that best resolves the planning issues and promotes balanced multiple-use and sustained-yield objectives
Develop the plan	Choose or modify the preferred alternative after analyzing public comments
Monitor and evaluate the resource management plan	Track changes and trends in the environment caused by planning decisions and evaluate compliance with the plan, laws, and policies

Development of resource management plans requires the involvement and input by officials from Bureau headquarters, and from state, district, and resource area offices. Operational responsibility for managing the development of resource management plans lies with the responsible resource area manager. In addition, Bureau, district, and state office officials are responsible for providing budget and staff support for the resource area offices and for providing guidance and quality control during the planning process. Plans are approved by the Bureau's state director.

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## Implementation of Plan Goals and Decisions

After a resource management plan is approved, the next step in the process is for the Bureau to implement plan goals and decisions. Implementing some goals and decisions requires the Bureau to merely continue what it had been doing before the plan was approved, with some restrictions. Implementing others requires either specific actions detailed in the plans themselves or additional planning before actual on-the-ground actions can be taken.

Some plan goals and decisions can be implemented as a by-product of or in conjunction with the Bureau's routine field office operations. Activities such as issuing grazing permits, collecting grazing fees, approving rights-of-way clearances for roads and utility corridors, and issuing woodcutting permits are examples of routine operations. Although routine operations may not involve new initiatives, the Bureau considers them to be part of the plan's implementation process since they are to be carried out in a manner that is consistent with the plan. According to Bureau officials, approximately 85 to 90 percent of their resources are dedicated to such routine operations.

Other plan goals and decisions fall outside the realm of routine operations but are so clearly detailed in the plan that they can be implemented as soon as they are scheduled and funded. For example, the Billings, Montana, plan called for acquiring legal rights to cross privately owned lands so that the public could get to a recreational fishing area on Bureau-owned land. Thus, achieving this goal required only scheduling when the easements or titles to the land would be obtained and budgeting for the necessary funds.

Still other goals and decisions require additional planning before they can be implemented. Many of the decisions and goals in resource management plans are general in nature and require additional project-specific plans before they can be implemented. For example, the Glenwood Springs, Colorado, plan called for development and improvement of water sources and riparian and waterfowl habitats but did not specify the type or location of improvements needed. Therefore, a detailed project-specific plan was needed to identify the specific type and location of the improvements before the actual work could be undertaken.

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## Areas of Critical Environmental Concern

In passing FLPMA, the Congress recognized that there are special areas on the public lands containing important resources or natural hazards where special management attention is needed to protect the resources or the public's life and safety. In FLPMA, the Congress labeled these special areas "areas of critical environmental concern" and directed that their identification, designation, and protection be a priority.

For public land areas and sites to be eligible for ACEC consideration, the Bureau's regulations and implementing guidance establish three criteria that must be satisfied. First, a site must be relevant. The Bureau defines a relevant site as (1) one having a significant historic, cultural, or scenic value; (2) a fish or wildlife resource or other natural system; or (3) a natural hazard. Second, the relevant value, system, or hazard must be important. The Bureau defines an important site as one that is of more than local significance and worth. A natural hazard is considered important if it is a significant threat to human life or property. Third, special management must be needed to protect the relevant and important values.

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## Objectives, Scope, and Methodology

The Chairman, Subcommittee on National Parks and Public Lands, House Committee on Interior and Insular Affairs, asked us to assess

- the progress the Bureau has made in completing land-use plans (see ch. 2),
- whether the land-use plans that have been developed contain measurable goals and milestones (see ch. 3), and
- the progress the Bureau has made in designating ACECS (see ch. 4).

To determine the status of the Bureau's land-use plans and the progress the Bureau is making in completing the plans, we obtained information from the Bureau's planning office at the agency's Washington, D.C., headquarters and its state offices.

To determine whether the land-use plans that have been developed contain measurable goals and milestones, we reviewed 14 resource management plans from among the 68 plans that were either approved or in final draft form as of December 31, 1988. We selected two plans from each of the seven states included in our review. One plan was developed under supplemental planning guidance, which set specific plan content requirements by program. These requirements were issued by the Bureau to its field offices in November 1986. The other plan was developed before the guidance was issued. At the time of our field visits to

the individual resource areas, 8 of these 14 plans had been approved in final for at least 1 year. We selected the 7 states for our review to provide broad geographic coverage of the 11 western states. The states and specific resource areas selected are shown in appendix I. The Bureau's Chief of Planning told us that the 14 plans we selected are a representative cross selection of the Bureau's resource management plans.

To review the 14 plans in our sample in detail, we visited the 14 Bureau resource area offices responsible for developing and implementing the plans. In reviewing the 14 plans, as agreed with the Chairman, we concentrated on the consideration and coverage given to five areas: (1) livestock grazing, (2) wildlife, (3) recreation, (4) hard-rock minerals,<sup>3</sup> and (5) cultural resources. We also reviewed ACEC designations.

At each of the 14 resource area offices, we discussed plan preparation with the resource area manager, the planning and ACEC coordinators, and resource program specialists for grazing, wildlife, recreation, hard-rock minerals, and cultural resources. We examined resource management planning records and documents including preplanning records, management situation analysis summaries, draft plans, and resource inventory records and public comments.

For the eight plans that had final approval for at least one year at the time of our field visits, we reviewed the final approval decision, plan-monitoring records, and activity and other implementation records and schedules, and discussed implementation of the plan with resource area office officials. We also visited several designated and potential ACEC sites and discussed the issues of ACEC identification and designation with representatives of State Historic Preservation Offices and various interest groups such as The Nature Conservancy and the Natural Resources Defense Council. We reviewed the Bureau's regulations, guidelines, and instructions issued by headquarters and its state offices concerning public land resource inventories, land-use planning, and special management areas such as ACECS.

As agreed with the Chairman, we did not obtain written comments on a draft of this report from the Department of the Interior but obtained oral comments from the Department's Deputy Assistant Secretary for Land and Minerals Management, and incorporated them into the report. Our review was conducted from June 1988 through September 1989 in accordance with generally accepted government auditing standards. We

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<sup>3</sup>Includes mining for minerals such as gold, silver, and copper.

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also updated certain information contained in this report through July 1990.



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# Progress Made in Completing Resource Management Plans

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As of June 30, 1990, the Bureau had completed 63 of the 136 resource management plans it intends to prepare to guide the management of the public lands. Between 1976 and 1979, the Bureau developed planning regulations and initiated a number of pilot plans. From fiscal year 1980 through fiscal year 1989, the Bureau initiated work on an average of nine (ranging from 5 to 15) new plans per year.

The planning process requires input not only by the Bureau's planning staff but by resource specialists such as biologists, archeologists, and range conservationists as well. During the 1980s, budget and staffing cutbacks hampered the Bureau's ability to develop resource management plans. For example, from fiscal year 1981 to fiscal year 1989, the Bureau's planning staff was reduced by half from 355 full-time equivalent staff to 179.

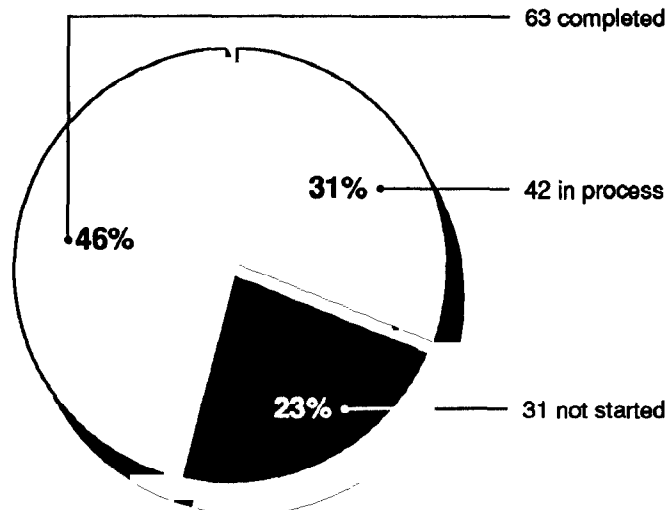
FLPMA did not establish mandatory completion dates for the plans, and competing work demands for the Bureau's staff as well as resource limitations were factors in plan delays. Legislation that would establish mandatory completion dates has been introduced in the Congress, but as of June 30, 1990, it had not been enacted. According to the Bureau's estimates as of June 1990, it will complete all 136 resource management plans by 1997.

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## Status of Resource Management Plans

According to Bureau officials, of the 136 scheduled resource management plans, 63 had been completed, 42 were in process, and 31 had not yet been started as of June 30, 1990. (See fig. 2.1.) The Bureau plans to begin work on the 31 unstarted plans by fiscal year 1995 and anticipates completing all the plans by fiscal year 1997.

Figure 2.1: Status of the Bureau's  
Resource Management Plans, as of June  
30, 1990



## Initial Steps in the Planning Process Took Several Years

From 1976, when FLPMA was enacted, through 1979, the Bureau prepared regulations to guide the preparation of the resource management plans. Final regulations were published in August 1979. In 1979, the Bureau also started work on the first of six pilot resource management plans. According to Bureau sources, extra time and resources were devoted to these pilot plans because field staff were developing the plans through an undefined process. The Bureau completed the first pilot plan—for the Glenwood Springs resource area in Colorado—in 1984. While the Bureau was working on the pilot plans, it also initiated work on five nonpilot plans in fiscal year 1980, and an average of about nine (ranging from 5 to 15) new plans per year each year thereafter, through fiscal year 1989.

The preparation of resource management plans is time-consuming. The plan preparation phase of this process comprises several products and, according to a Bureau planning official, it takes about 4 years to complete a plan. The first product, is a draft plan and EIS, which takes an average of about 2 years to prepare. Preparing the draft plan is the most time-consuming part of the plan preparation process since Bureau staff must identify issues to be addressed in the plan, collect information, identify management alternatives, conduct an environmental assessment, and draft the plan.

The next product of this phase (the proposed plan) takes an average of about 9 months to complete. To complete this product, public comments on the draft are evaluated and the Bureau selects the preferred land management approach from the alternatives presented in the draft plan.

During the development of the last product of this phase, which averages about 11 months to complete, the public is allowed to file protests with the Bureau for objections to all or part of the plan. If a protest results in significant changes to the proposed plan, an additional public comment period is provided. Once all protests are resolved, the Bureau's state director approves the plan, which then becomes the operable resource management plan for the area.

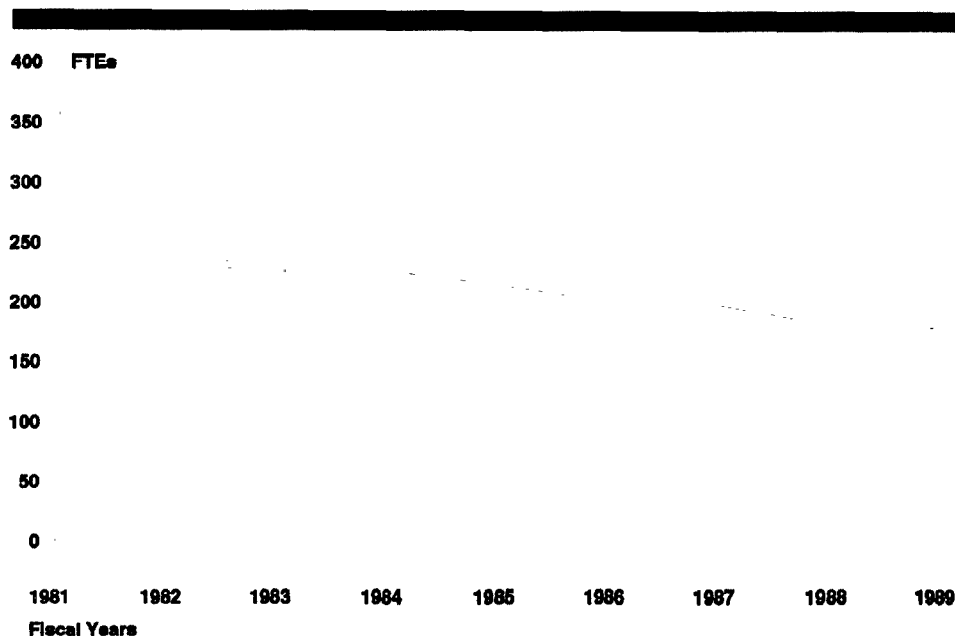
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## **Bureau Planning Resources Reduced During the 1980s**

In 1980, the Bureau began its full-scale effort to develop resource management plans. However, rather than experiencing an increase in resources to perform this expanded workload, the Bureau experienced a reduction in the staff resources needed to perform this work.

During the 1980s, the Bureau experienced reductions in both the funding and staff resources available for the planning function. In fiscal year 1981, the Bureau had a planning staff of 355 full-time equivalent positions. By fiscal year 1989, the staffing level had been reduced to 179 full-time equivalent positions, or a 50-percent reduction. The largest reduction in the planning staff levels occurred from fiscal year 1981 to fiscal year 1982, when the planning staff was reduced by 122 full-time equivalent positions.

**Figure 2.2: Bureau Planning Staff Full-Time Equivalent Positions, Fiscal Years 1981-89**



To cope with the staffing reductions, the Bureau made a number of policy decisions affecting the resource management-planning process. Specifically, the Bureau streamlined the process by deciding to rely on existing inventory data to the extent possible, rather than developing new data on the resources on the public lands. The Bureau also decided to streamline the planning process by focusing the plans on issues that were considered critical for a given resource area, rather than on all potential issues. For example, the plan for the Glenwood Springs, Colorado, resource area that was started in 1979 addressed 21 issues, whereas the plan for the Cody, Wyoming, resource area, started in 1986, addressed only 3 issues.

## Competing Priorities Delayed Plan Completions

Because competing work demands on the Bureau's staff have received higher priority, completion of the Bureau's resource management plans has been delayed. To develop resource management plans, the Bureau uses planning teams that comprise specialists such as range conservationists, wildlife biologists, and archeologists. In addition, Bureau district and state officials are responsible for supervising and coordinating the development of the plan. The Bureau's specialists who participate in the development of resource management plans also have responsibilities for day-to-day or routine management of their individual program

areas. For example, rangeland managers typically have responsibility for administering grazing permits, managing range improvement projects, and monitoring the condition of grazing allotments, in addition to providing input on grazing for the resource management plan.

The specialists' routine responsibilities may have established deadlines. For example, a range conservationist must authorize grazing levels and process bills for grazing fees, often for hundreds of permittees. As a result, work on the resource management plan is at times deferred in favor of more urgent responsibilities.

This problem is exacerbated by the fact that for some of its programs, there are not enough Bureau specialists to perform even routine responsibilities much less devote the additional time required for resource management planning. For example, we have previously reported that limited staff resources had contributed to slow progress in protecting and improving riparian areas—narrow bands of green vegetation along the banks of rivers and streams and around springs, bogs, lakes, and ponds. Bureau staff told us that they could not give enough effort to riparian area management because of other competing demands on their time.<sup>1</sup> Similarly, we have also reported that staffing constraints have limited the Bureau's ability to manage livestock grazing allotments (separate grazing units). Bureau range managers told us that limited staff resources prevented them from monitoring all grazing allotments and that they were unable to adequately monitor even those allotments targeted for intensive management. For example, Bureau range managers at the Nevada State Office told us that Bureau staff made annual monitoring visits to only about one-third of their allotments. They said that many allotments targeted for intensive management were not visited each year and that staffing shortages usually prevented other allotments from being monitored.<sup>2</sup>

Six of the 14 resource management plans we reviewed in detail experienced delays. While there were a number of reasons for these delays, other competing priorities and/or resource limitations were a factor in each of these delays. For example, work on the Phoenix, Arizona, draft resource management plan was scheduled to be completed in 1986, but was not actually completed until 1988 because, according to a Bureau

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<sup>1</sup>Public Rangelands: Some Riparian Areas Restored but Widespread Improvement Will Be Slow (GAO/RCED-88-105, June 30, 1988).

<sup>2</sup>Rangeland Management: More Emphasis Needed on Declining and Overstocked Grazing Allotments (GAO/RCED-88-80, June 10, 1988).

official, staff had to postpone work on the plan to assist with fire fighting.

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## **Legislation Introduced to Establish a Planning Deadline**

Concern about the pace of developing resource management plans resulted in a bill which was introduced in the Congress in 1989 that would establish mandatory completion dates for the plans. FLPMA had not established a date for completing resource management plans. The bill—H.R. 828—proposes to amend FLPMA by requiring that

Land use plans meeting the requirements of this Act shall be developed for all the public lands outside Alaska no later than January 1, 1997, and for all public lands no later than January 1, 1999.

The bill was passed by the House of Representatives in 1989, and as of June 1990, was awaiting action by the Senate.

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## **Conclusions**

More than 13 years after FLPMA was enacted, the Bureau has completed less than half of the resource management plans needed to guide the management of the public lands. A number of factors have contributed to this limited progress. Among them are significant reductions in staffing available to work on plan development (50 percent from fiscal year 1981 to fiscal year 1989), and competing program priorities and resource limitations. As of June 30, 1990, the Bureau estimated that it will complete all 136 resource management plans by 1997.

# Limited Implementation of Completed Resource Management Plans

When completed, the Bureau's resource management plans establish the goals and decisions for managing the public lands. However, the plans are of limited practical value unless the Bureau takes actions to effectively implement them once approved. In other words, the completion of the resource management plan is not an end in itself, but rather a beginning.

For the completed plans we reviewed, the Bureau had made only limited progress in converting approved plan goals and decisions into on-the-ground actions. Specifically,

- schedules showing when implementation actions for approved plans would take place typically had not been developed,
- implementation actions had not been linked to the budgetary resources necessary to carry them out, and
- progress made in implementing the plans was typically not tracked or monitored.

The absence of an effective management control system to ensure that the specific actions needed to implement approved resource management plans that are scheduled, funded, and tracked had contributed to these shortcomings. In July 1990, the Bureau issued plan implementation instructions to its field offices that address these shortcomings.

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## Plan Implementation Actions Have Not Been Scheduled, Linked to Budgetary Resources, or Tracked

To ensure that plan goals and decisions are implemented in an orderly and timely manner, the Bureau needs to schedule them, provide the resources to carry them out, and monitor or track their implementation progress. However, we found that (1) most of the Bureau's field offices we reviewed in detail had not developed plan implementation schedules, (2) an effective plan implementation/budget interface does not exist, and (3) progress in implementing the plans was not being effectively monitored or tracked.

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## Plan Implementation Actions Often Not Scheduled

As shown in table 3.1, six of the eight plans we reviewed that had received final approval had not established schedules for implementing their resource management plans.

**Table 3.1: Elapsed Time in Plan Implementation Phase and Implementation Schedule Status at the Time of GAO's Visit to the Resource Area Offices**

<b>Resource management plans</b>	<b>Elapsed time since approval of plan (months)</b>	<b>Implementation schedule developed</b>
Glenwood Springs, Colo.	58	No
Hollister, Calif.	58	Yes
Billings, Mont.	49	No
Platte River, Wyo.	45	No
John Day, Oreg.	43	No
Lahontan, Nev.	38	Yes
Yuma, Ariz.	33	No
Elko, Nev.	20	No

The Platte River, Wyoming, plan, approved in July 1985, called for developing an implementation schedule by September 1985. About 4 years after the plan was approved, we found that an implementation schedule had not been developed. The field office official responsible for the schedule told us that he had started to develop an implementation schedule but suspended his efforts in 1985 because the Bureau's Wyoming State Office was developing a plan-scheduling system. However, as of May 1989, the state system had not been developed, and the resource area office had not resumed its efforts. We also found that five other plans that had been approved for at least 1 year at the time of our visits did not have detailed implementation schedules. For example, the resource area manager at Glenwood Springs, Colorado, told us that an implementation schedule for the plan approved in 1984 had not been established because of changing priorities and funding and staffing uncertainties. Specifically, he said he did not want to establish schedules because they probably would not be met.

Without a schedule, however, even relatively straightforward plan decisions that can be implemented through routine operations may remain unimplemented. For example, the Glenwood Springs, Colorado, plan called for removing livestock from 44 specific grazing allotments by October 15th of each year to provide winter rangeland for wildlife. This decision easily could have been implemented as a by-product of the routine annual grazing authorization process. However, at the time of our visit to Glenwood Springs (nearly 5 years after the plan had been approved), the resource area range specialist told us that these grazing season adjustments had not been made.

In contrast, the Hollister, California, resource area office had developed for its plan a 5-year implementation schedule, which was approved in



August 1984. While implementation schedules do not guarantee that actions will be completed by their scheduled dates, they do provide the Bureau, the Congress, and the public with an opportunity to measure progress against established milestones.

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### Plan Implementation Actions Not Linked to Budgetary Resources

Accomplishing specific actions to implement plan goals and decisions also requires their translation into staffing and funding requirements needed to carry them out. A plan goal to manage recreation activities in a resource area has little practical effect if the resources needed to carry out specific recreation projects are not identified, requested, and provided. For example, the John Day, Oregon, plan approved in 1985, called for designating and fencing a specific area for off-road vehicle use to limit environmental impacts to the fenced area. However, 4 years after the plan was approved, this project had not been funded.

Bureau headquarters officials told us that there had been a disconnection between plan implementation actions and budgets necessary to carry them out. This disconnection was evident at the Bureau resource area offices we visited. For example, the Glenwood Springs, Colorado, Resource Area Office staff told us they provide little input to the budget process. Staff at the Grand Junction District Office, the next higher field office level, said their input into the budget process consists of an informal listing of the district's general priorities.

The resource area manager at Billings, Montana, told us that any link between annual funding and plan implementation was coincidental because most funding is tied to routine field office operations. Plan implementation is thus a coincidental by-product of the Bureau's budget process rather than a front-end consideration.

In 1980, we issued a report that emphasized the need for an effective linkage between the Bureau's plans and annual budgets.<sup>1</sup> In that report, we stated that the Bureau recognized the need for linking plans and budgets but that efforts to establish links between the plans and budgets had been delayed because existing land management plans did not provide sufficient quantifiable data which could be related to budget requirements. At that time, Bureau officials told us they hoped to implement a system to link the plan with the budget within 5 to 7 years. In

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<sup>1</sup>Changes in Public Land Management Required to Achieve Congressional Expectations (CED-80-82 & 82A, July 16, 1980).

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July 1990, the Bureau issued instructions that provide for linking the planning and budgeting processes.

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**Progress in Implementing  
Plans Not Monitored or  
Tracked**

Monitoring and tracking a plan provides an important management control for measuring the progress made in implementing its goals and decisions. The Bureau's resource management-planning instructions require that a system be established to track plan implementation progress. However, the Bureau field offices responsible for six of the eight completed plans we reviewed had not established effective tracking systems to provide the basic information necessary to assess whether plan implementation was on, ahead of, or behind schedule.

The Lahontan, Nevada, resource management plan was one of the two that had established a tracking system to provide the resource area office manager with information on the status of plan implementation. The Lahontan plan was approved in 1985, and an implementation and tracking system was started in 1987. This system provides information on specific actions scheduled for implementation, including planned and actual completion dates. Implementation actions on the schedule include those contained in the plan itself as well as those contained in project-specific plans. For example, under the wildlife program, implementation actions scheduled for 1990 include developing one habitat management plan; revising another habitat management plan; and completing five projects to improve riparian, sage grouse, and deer habitat. The system also allows for identifying actions that were scheduled but not fully implemented. For example, two grazing allotment management plans and one wild horse herd management plan were scheduled for 1988, but the tracking system revealed that these actions had not been completed.

In contrast, the other six Bureau field offices had less sophisticated tracking systems. Typically, the tracking systems at these six offices consisted of log books that had separate sheets for each plan goal and decision. While the log books showed when an action had been taken, they identified neither all needed actions nor the time frames for their completion. Thus, the status of the plan's implementation is not readily measurable.

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## **Bureau Initiatives to Improve the Plan Implementation Process**

Bureau headquarters officials have recognized for some time the need to strengthen the plan implementation process. In March 1989, the Bureau's headquarters planning staff developed draft instructions for plan implementation and requested comments on the draft proposal from the Bureau's state offices. In July 1990, the instructions were issued in final to the Bureau's field offices.

The Bureau's July 1990 instructions call for

- developing plan implementation schedules no later than 90 days after plan approval,
- linking plan implementation schedules to the budgetary process, and
- tracking and documenting progress made in implementing the plan.

These instructions, if properly implemented, should address many of the shortcomings in implementing the resource management-planning process discussed in this chapter.

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## **Conclusions**

The goals and decisions contained in the Bureau's resource management plans for the management of the public lands are of little practical value unless steps are taken to convert the conceptual ideals of approved plans into on-the-ground actions. In essence, the issuance of an approved resource management plan should not be viewed as an end but rather as a beginning. During our work, we found that the Bureau has made only limited progress in taking the actions necessary to implement the approved resource management plans we reviewed. Schedules for implementing actions typically had not been developed, implementing actions had not been linked to the budgetary resource requirements necessary to carry them out, and progress made in implementing plan goals and decisions had typically not been tracked. Without these follow-on actions, the process of developing the resource management plans is little more than a paper exercise and the plans themselves little better than reference documents. During our review, we discussed the need for these follow-on actions with Bureau officials, and in July 1990, the Bureau issued plan implementation instructions to its field offices, which, if properly implemented, would address many of the problems discussed in this chapter.

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## **Recommendation**

We recommend that the Secretary of the Interior instruct the Director, Bureau of Land Management, to closely monitor the implementation of

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**Chapter 3  
Limited Implementation of Completed  
Resource Management Plans**

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the Bureau's July 1990 resource management plan instructions by the Bureau's field offices.

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**Agency Comments**

The Department of the Interior's Deputy Assistant Secretary for Land and Minerals Management said he agrees with this recommendation.

# Inconsistent Treatment of Areas of Critical Environmental Concern

FLPMA directed the Bureau to give priority in the land-use planning process to designating and protecting areas of critical environmental concern. ACECs are areas on the public lands that require special management attention to protect or prevent irreparable damage to important resources, such as historic and cultural sites, or to protect the public's life and safety from natural hazards such as avalanches and landslides.

The treatment of ACECs in the resource management-planning process varied considerably among the 14 Bureau plans we reviewed. For example, in some plans, the Bureau's field offices had identified ACECs as a planning issue and had documented the process of identifying and designating ACECs. Other field offices, however, had not identified ACECs as a planning issue and had handled the ACEC process informally, with little or no documentation of what areas were considered for designation or how final decisions were made. We found that the broad latitude given to the Bureau's field offices in designating ACECs, combined with philosophical differences between Bureau field office managers on the need for and importance of designating and protecting such sites, were important factors contributing to the inconsistencies we found.

In 1986, the Bureau recognized that its field offices had been inconsistent in handling the ACEC issue, and in September 1988 the Bureau issued revised ACEC guidance to its field offices. However, the root causes of the inconsistencies we observed—substantial field office decision-making discretion and philosophical differences between Bureau field office managers—still exist. Consequently, there is a need for the Bureau's headquarters to closely monitor the application of the revised guidance at its field offices to ensure consistency in designating eligible areas of the public lands as ACECs.

## Treatment of ACECs Varied at Bureau Field Offices

The 14 Bureau resource area offices we visited had given widely disparate treatment to the identification, evaluation, and designation of ACECs. Although FLPMA calls for the Bureau to give priority to ACECs in the planning process, 7 of the 14 plans we reviewed had not singled out ACECs as an issue to be addressed. The degree to which this meant that eligible areas were not designated as ACECs was not readily quantifiable.

Only 3 of the 14 plans we reviewed (Yuma in Arizona, Brothers-LaPine in Oregon, and Cody in Wyoming) had documented their ACEC candidate identification and designation decision-making process in any detail. For

the other 11 plans, documentation of the ACEC identification and designation process was typically made informally with little or no documentary evidence.

We did, however, review what documentation was available and discussed ACEC identifications and designations with the Bureau's field office specialists and managers. For example, the plan for Uncompahgre Basin, Colorado, did not have documentary evidence of the ACEC identification, evaluation, and designation process. Because documentation was lacking, we discussed how ACECs were dealt with during plan development with the field office staff. They told us that designating ACEC sites was not a high priority. According to them, there was no specific solicitation of ACEC candidate sites from either the public or Bureau staff. One member of the planning team was assigned responsibility for identifying ACEC candidates on the basis of the team members' personal knowledge of the resource area. No list or other record was prepared for the candidate sites considered.

Some of the Bureau's resource area offices that we visited had designated many areas as ACECs, while others had designated none. Table 4.1 shows the number of ACEC designations that have been made or that are planned for the 14 plans we reviewed.

**Table 4.1: ACEC Designations Made or Planned in the 14 Plans GAO Reviewed**

<b>Resource management plan</b>	<b>Number of ACECs</b>
Brothers-LaPine, Oreg.	12
Arcata, Calif.	7
Phoenix, Ariz.	7
Glenwood Springs, Colo.	6
Cody, Wyo.	5
Uncompahgre Basin, Colo.	4
Hollister, Calif.	3
Lahontan, Nev.	3
Platte River, Wyo.	2
West HiLine, Mont.	2
Yuma, Ariz.	1
Billings, Mont.	0
Elko, Nev.	0
John Day, Oreg.	0
<b>Total</b>	<b>52</b>

We found that philosophical differences between the Bureau's field offices were a significant factor in whether relevant and important sites on the public lands were designated as ACECs. For example, the Brothers-LaPine resource area office covers 1.1 million acres of public land in Oregon and is illustrative of a resource office that apparently emphasized ACEC designations. The resource management plan designated 12 ACECs of various sizes and types including a site containing basalt formations, Indian pictographs, and primitive recreation resources; a site containing recreation, riparian, and fishery resources; a site containing sensitive plants; and a site containing a western juniper/sagebrush plant community, a resource that is common throughout many parts of the western United States.

At Billings, Montana, where the plan covers 432,000 acres of public land in the state, the resource area manager told us that all of the potential ACEC sites identified within the resource area can be adequately protected without ACEC designation and special management. However, there is a site within this resource area that, according to the Bureau's resource area archeologist, possibly meets the ACEC eligibility criteria but was not designated. Weatherman Draw is an area of approximately 7,700 acres containing a cluster of over 50 American Indian rock art sites. The area was not designated as an ACEC in the resource management plan even though the Bureau's resource area archeologist at the time considered the initial eight sites inventoried to be unique and a significant source of archeological data on little understood aspects of early Northwestern Plains Indian behavior. The current archeologist told us that 40 additional rock art sites have been identified and that the resource values at Weatherman Draw qualify as an ACEC. However, the resource area manager told us that he does not plan to designate the sites as an ACEC because he believes they can be adequately protected by routine management.

At Elko, Nevada, where the plan covers 3.1 million acres of public land in the state, a number of areas contain important values but were not designated as ACECs. The Elko resource area office archeologist told us that the resource area contains a number of cultural sites that he believes should have been designated as ACECs, including a unique rock quarry that had been used for centuries by Native Americans for tool-making and a rare stratified deposit of ash from the volcanic eruption that formed Crater Lake. The Elko district office manager told us that no ACECs were designated because the Bureau's Nevada State Director was generally opposed to ACEC designations and because of his belief

that all resources could be adequately protected by standard or routine management or other statutory authorities.

The Bureau's Platte River, Wyoming, resource area includes a site containing pterodactyl tracks. Pterodactyls were a form of flying reptile that became extinct millions of years ago. Foot tracks of these animals are very rare; only four sites containing such tracks have been found in the world. Recognizing that this site was unique and could be destroyed by indiscriminate collection, vandalism, or mining, the Bureau designated the area as an ACEC in 1980. However, the Platte River resource management plan removed the ACEC designation for this site in 1985. Bureau resource area officials told us that in designating the pterodactyl tracks as an ACEC in 1980, it was thought that the designation would result in additional funding from headquarters for site management. They said that the additional funding never materialized, so the ACEC designation was dropped. The area is currently unprotected.

Overall, ACEC designation, which also vary considerably among the Bureau's state offices, reflect different philosophical approaches toward ACECs among the Bureau's state offices. For example, in a 1986 memorandum, the Bureau's Nevada State Office Director said that some states such as California and Oregon have interpreted FLPMA quite liberally and have designated ACECs on a wholesale basis. He contrasted those states to Nevada, which has taken the position that existing management actions are sufficient to adequately protect sensitive resources on the public lands. Operationally, the Nevada State Office Director had instructed the Bureau's Nevada district offices specifically not to propose the designation of wildlife areas such as sage grouse strutting grounds, bighorn sheep habitat, or desert tortoise habitat as ACECs, when other management options are available.

During our work, we found that several areas had been designated as ACECs in one state but that areas with similar values had not been designated in other states. Among the Bureau's state offices, the number of sites designated as ACECs ranged from 105 in California and 99 in Oregon, to 4 in Montana, and 6 in Nevada. Table 4.2 shows the ACEC designations for 11 western states as of September 30, 1989.



Table 4.2: ACEC Designations as of  
September 30, 1989

State	Number designated
California	105
Oregon	99
Idaho	58
New Mexico	57
Colorado	32
Wyoming	23
Alaska	18
Utah	17
Arizona	10
Nevada	6
Montana	4
<b>Total</b>	<b>429</b>

## Bureau Revises ACEC Guidance

In 1986, the Bureau recognized that its field offices had been inconsistent in their treatment of ACECs in the planning process. The Bureau believed that confusion and uncertainty about ACEC requirements and procedures accounted for the disparity between its field offices.

To address the problems it had identified, the Bureau revised its ACEC guidance to its field offices in September 1988. Since all of the 14 plans we reviewed in detail either had been approved or were published in draft as of September 1988, we were unable to determine whether the new ACEC guidance would overcome the inconsistencies that both we and the Bureau have observed. However, the new guidance still gives the Bureau's field offices substantial discretion in the ACEC decision-making process. For example, the new guidance allows field managers to decide not to designate otherwise relevant and important areas if

- they conclude that the area or value can be sufficiently protected with standard or routine management;
- the area is being proposed for designation under another statutory authority, such as a wilderness designation;
- they conclude that no special management attention is justified because exposure to risks of damage or threats to safety are greater if the area is designated (i.e., by drawing additional public attention to it); or
- they conclude that there are no reasonable special management actions that can be taken to protect the resource from irreparable damage or to restore it to a viable condition.

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Thus, to the extent that individual field office managers are philosophically disinclined to designate ACECS, the reasons allowing nondesignation listed above provide sufficient justification for their decisions.

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## Conclusions

FLPMA directed the Bureau to give priority to the designation and protection of ACECS in the land-use planning process. The implementation of this legislative mandate, however, has been inconsistently applied. For example, 7 of 14 plans we reviewed had not even identified ACECS as a planning issue. The Bureau's field office managers have used the broad discretion afforded them under the Bureau's guidance to make widely disparate ACEC decisions.

The Bureau revised its ACEC guidance in September 1988 to address past inconsistencies, but the guidance still gives the Bureau's field offices substantial discretion in making ACEC decisions. While we do not dispute the basic concept of decentralized decision-making, we believe there is a need for the Bureau to take those steps necessary to ensure that its field offices handle their treatment of ACECS consistently to ensure that eligible areas of the public lands are identified, evaluated, and appropriately designated and protected.

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## Recommendation

We recommend that the Secretary of the Interior instruct the Director, Bureau of Land Management, to (1) require that ACECS be specifically addressed and documented in the resource management planning process and (2) monitor the Bureau field offices' application of ACEC guidance to ensure greater consistency among the Bureau's offices in the process and to ensure that eligible areas of the public lands are designated and protected as ACECS.

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## Agency Comments

The Department of Interior's Deputy Assistant Secretary for Land and Minerals Management said he agrees with this recommendation.



# Bureau Resource Management Plans Reviewed by GAO

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<b>State</b>	<b>Resource management plan</b>
Arizona	Phoenix and Yuma
California	Arcata and Hollister
Colorado	Glenwood Springs and Uncompahgre Basin
Montana	Billings and West-HiLine
Nevada	Elko and Lahonton
Oregon	Brothers-LaPine and John Day
Wyoming	Cody and Platte River

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