APPENDIX A COAL PLANNING AND ACTIVITY PLANNING

APPENDIX A-1 – FEDERAL COAL PLANNING PROCESS

The development of federal coal is a tiered process. As the size of the area of consideration is reduced, the amount of data and depth of analysis is intensified. Through this process, attention and detailed analysis becomes focused on those coal tracts most likely to be mined.

Prior to leasing federal coal, the BLM completes two levels of planning:

1. Land Use Planning, where coal deposits acceptable for further consideration are identified.

2. Activity Planning, where specific coal tracts are delineated for leasing.

After a tract has been leased, NDPSC, in concert with OSMRE, analyzes a site-specific mining and reclamation plan, requires bonding and monitors the mining operation. The BLM is also involved in the approval of Resource Recovery and Protection Plans, setting of performance bonds, monitoring of coal production, and inspection of reclamation.

A description of the two planning processes undertaken by BLM prior to actual leasing or lease offering is provided below. Detailed descriptions are presented in the Final EIS Supplement, Federal Coal Management Program (USDI 1985) and in the federal coal management regulations presented in 43 CFR 3400. A flow chart depicting the general coal planning process is provided at the end of this appendix.

Land Use Planning

During land use planning federal coal is analyzed for development potential and the presence of unacceptable environmental tradeoffs using four broad screens (43 CFR 3420.1-4):

- (1) coal development potential,
- (2) unsuitability criteria,
- (3) multiple-use tradeoffs, and
- (4) surface owner opposition.

The four screens are generally applied to federal coal within the planning area in the order presented unless it is obvious that later screens will apply. Each of the screens is discussed in detail in **Appendix B**.

The major land use planning decision concerning coal is the identification of areas acceptable for further consideration for leasing. The four coal screens constitute the framework used to identify areas obviously not suited to coal mining. Application of the four screens early in the overall coal planning process eliminates most potential environmental conflicts, allows coordination of management concerns and objectives between agencies and publics, and serves to focus future coal management on those areas best suited to mining. In addition to the finding of coal acceptable for further consideration, land use planning includes the identification of data inadequacies, and suggested mitigation or lease stipulations.

Adoption of a RMP by the BLM constitutes a major federal action and requires the preparation of an EIS. Coal-related portions of the alternatives of the EIS are generally based on variations in the application of the multiple-use tradeoff screen. The land use plan and related NEPA documențation ensure opportunities for public input and coordination with state and federal resource management agencies.

APPENDIX A-2 – ACTIVITY PLANNING

Coal

Activity planning provides the opportunity to review specific proposed lease areas in a detailed manner. The aerial scope of activity planning is much smaller than that of land use planning.

Activity planning involves the analysis of many of the same environmental factors as considered during land use planning but on a site-specific basis. Detailed inventories and analyses are conducted, as necessary to allow refinement and implementation of land use plan decisions. Activity planning allows the application of mitigation measures or stipulations prescribed in the land use plan to specific locations such as archaeological sites or wildlife habitats.

Activity planning provides the opportunity to revisit areas initially affected by the unsuitability criteria under general land use planning. Adjustments may need to be made when areas are looked at on the detailed scale provided under activity planning. Application of site-specific exceptions to the unsuitability criteria can be made during activity planning if the conditions of the exceptions listed in 43 CFR 3461.1 are met.

Lands affected by other coal screens can also be more closely analyzed during activity planning. If the original purpose for exclusion of an area under one of the screens no longer exists, and there are no overlaps with other screens, the once affected area can be included for activity planning.

Activity planning also includes NEPA compliance, often in the form of an EIS. This analysis may include an assessment of expected cumulative environmental impacts in addition to site-specific analyses. The NEPA process also ensures opportunity for public input and coordination with state and federal resource management agencies.

Other Resources

The RMP is not a final implementation decision on actions which require further specific plans, process steps, or decisions. The actions requiring activity plans are referenced in Chapter Two of this docu-

FIGURE A-1

FLOW CHART OF FEDERAL COAL PLANNING PROCESS

(Required BLM land use planning steps are presented in bold type)

Land Use Planning	Activity Planning
 Notice of Intent to Prepare RMP 	 Delineate Tracts or Receive Lease Applications
 Call for Coal Resource Information 	
— Identify Issues	 Ensure Consistency with RMP
 Initiate Assessments of: 	
Development Potential Unsuitability	 Consult With or Notify Governor and Others as Appropriate
Multiple-Use Tradeoffs	
 Develop Planning Criteria 	 Conduct Necessary Inventories
 Analyze Management Situation 	 Modify Tract Boundary if Necessary
 Conduct Necessary Inventory 	
 Complete Preliminary Assessments of: 	 Prepare Site Specific Analysis (NEPA Documentation)
Development Potential	 Prepare Regional Analysis (NEPA Documentation) if Necessary
Unsuitability	
Multiple-Use Tradeoffs	Necessary
 Consult With Surface Owners 	 Consult with Governor and Others as Appropriate
— Formulate Alternatives	
 Estimate Effects of Alternatives 	- BEGIN LEASE SALE PROCEDURES
 Complete and Document Results of Surface Owner Consultation 	;
 Select Preferred Alternative and Publish Draft Plan and EIS 	:

- Select RMP and Publish **Proposed Plan and EIS**
- Hold Public Hearing if Requested
- Issue Record of Decision
- Identify Areas Acceptable for Further Consideration for Leasing or Exchange

ment. Activity plans will be written for specific resources and areas and will clearly establish objectives, actions to be taken, timeframes, equipment, work force, projected budget requirements and monitoring needs. Clear objectives and goals, crucial to multi-resource plans, will provide direction for management while providing flexibility. Management prescriptions will be closely tied to plan objectives. Activity plans must be cost effective. Detailed inventories and analyses will be conducted as necessary to allow refinement and implementation of land use plan decisions. Activity planning allows the application of mitigation measures or stipulations prescribed in the land use plan.

Besides involving various levels of management intensity, activity plans may involve more than one resource, e.g., range, watershed, and wildlife, in **Coordinated Resource Management Plans. Coordi**nated Resource Management Plans are generally preferred over single resource activity plans. Coordinated Resource Management Plans establish overall objectives and goals for all resources considered. Where possible, BLM activity plans will be coordinated with and tied to other federal and state agency plans (e.g., SCS ranch plans) as well as related private operating plans for adjacent lands. Activity planning includes NEPA compliance which also provides opportunity for public input and comment as well as coordination with state and federal agencies.

The general objectives of activity plans are based on resource objectives established in the land use plan. These objectives are refined and developed to accommodate more site-specific resource considerations.

Activity plans establish timeframes for development and implementation of the actions to be taken and present an analysis of expected results. Benefitcost analysis is conducted during development of the activity plan. Implementation is prioritized to allow more accurate budget projections.

Activity plans also establish resource monitoring requirements and procedures to be used to assess progress towards the objectives and goals; helping to identify necessary revisions or adjustments in management prescriptions. When monitoring indicates management actions are not achieving the resource objectives, the management actions will be adjusted while staving within the framework of the land use plan. Monitoring also provides an opportunity to assess the appropriateness of the original resource objectives.