

Formal Comment Period: Substantive and Non-Substantive Comments

Resource Management Plans for Western Oregon

From April 24-August 21, 2015, the BLM held a formal comment period during which members of the public and government agencies could submit comments on the Draft Resource Management Plan/Environmental Impact Statement for Western Oregon. The BLM received approximately 4,500 comments, and the RMP for Western Oregon team is reviewing, assessing, and working on addressing responses to substantive comments. These responses will be published with the Proposed RMP/Final EIS in the spring of 2016.

All comments submitted during the formal comment period are read and all are given equal consideration and evaluation for a determination of being “substantive”. Concerns and information raised from all comments, including those found to be non-substantive, will be accordingly shared and discussed with managers and interdisciplinary team members.

Determining the substantive nature of comments is not a judgment or value-driven process. It is not influenced by who has submitted the comment or where the commenter resides. It is instead a systematic process of reviewing the content of the information provided to the BLM and utilizes the following general guidelines:

Substantive comments are those that suggest the analysis is flawed in a specific way, present new information relevant to the analysis, or present reasonable alternatives other than those presented in the Draft RMP/Draft EIS. Generally, comments that suggest the analysis is flawed challenge the accuracy of information presented with supporting information or challenge the adequacy, methodology, or assumptions of the environmental or social analysis with supporting rationale. The BLM is required to respond to all substantive comments.

Comments determined not to be substantive include comments that present personal or organizational opinions that do not include justification through facts, comments that do not pertain to the plan, comments that present a vote for or against actions without supporting information, and comments that are vague or open-ended. The BLM is not required to respond to non-substantive comments.

The BLM has developed an organization schema for cataloging all comments. This organizational process first divides substantive comments from those determined not to be substantive. Substantive comments are then further organized by the subject matter of the content of the substantive portion(s) of the comment. This further categorization of substantive comments facilitates the dispersal of the comments to the appropriate interdisciplinary team members in facilitating development of responses. Every interdisciplinary team member will read all substantive comments relevant to their resource, but not all interdisciplinary team members will read all substantive comments.



For the RMPs for Western Oregon, the filtering, sorting, coding, summarizing, organizing, and indexing of all comments is being conducted by a third-party contractor. All contractor work is reviewed for adequacy and accuracy by BLM staffs knowledgeable of the resources, programs, concerns, and needs for management in western Oregon in the planning area.

The Proposed RMP/Final EIS will include an appendix with BLM responses to all substantive comments timely submitted on the Draft RMP/Draft EIS. Because of the anticipated volume of comments, the BLM does not intend to respond to non-substantive comments in the Proposed RMP/Final EIS appendix.

Although the formal comment period is now closed, you can always send us your thoughts at BLM_OR_RMPs_WesternOregon@blm.gov. Any comments submitted outside the window of the comment period will be read and considered by BLM staff as appropriate.

Next Steps:

Date	Event
April 24, 2015	Release of Draft RMP/EIS
April 24-August 21, 2015	Comment Period
May-January 2016	Develop and analyze Proposed RMP/Final EIS
Spring 2016	Publish Proposed RMP/Final EIS
Spring 2016	Protest Period, Governor’s Consistency Review, Resolution
Summer 2016	Record of Decision

The Resource Management Plans (RMP) for Western Oregon will determine how the BLM-administered lands in western Oregon will be managed to further the recovery of threatened and endangered species, to provide for clean water, to restore fire-adapted ecosystems, to produce a sustained yield of timber products, to coordinate management of lands surrounding the Coquille Forest with the Coquille Tribe, and to provide for recreation opportunities.

For more information, please visit the BLM’s Resource Management Plans of western Oregon website at <http://www.blm.gov/or/plans/rmpswesternoregon/index.php>.