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Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

For America's Heritage

July 5, 2012

Mike Mottice, Acting State Director
BLM Oregon
P.O. Box 2965
Portland, OR 97208

JUL - 9 2012

Mike Pool, Acting Director
BLM Washington Office
1849 C Street NW, Rm. 5665
Washington DC 20240

Dear Messrs. Mottice and Pool:

The Public Lands Foundation (PLF) wants the BLM to successfully revise the outdated Resource Management Plans being used today. However, we are concerned with the lack of focus (Purpose and Need) and timing of the revisions of Resource Management Plans in Western Oregon.

The PLF is a National 501(c)(3) nonprofit organization that advocates for the retention of America's National System of Public Lands in public hands professionally and sustainably managed for responsible common use and enjoyment. Our membership is made up primarily of retired BLM employees and represents a broad spectrum of knowledge and professional experience in public land management. Thus, the PLF has a shared interest in the management of the National System of Public Lands for the benefit of our communities for future generations and under the principles of multiple use.

Our members have attended Scoping meetings in various districts and have reviewed the documents posted on your website. Based upon their attendance and reviews we raise the following concerns:

The O&C lands were once private lands, which were returned to federal ownership by Congress, and later Congress, in order to compensate the counties for this loss of tax base, passed the O&C Act which directed that these O&C lands be managed for timber harvest with a major portion of the receipts from timber sales be given to the counties, a practice that has been hampered in recent years by environmental issues. Congress directed a special mission for the O&C lands, and PLF is concerned that BLM has not done an adequate job of explaining the history, provisions and requirements of the O&C Act in these Scoping meetings. It appears to the PLF that the O&C Act is being down played during Scoping to allow a freer flow of ideas. PLF applauds the BLM for wanting to make the discussion of ideas and issues broader and richer. However, we are concerned there is no focus or Purpose and Need for the revisions. Our concerns are two fold: 1) at some point the BLM must clearly state the boundaries within which they will focus their decisions. This has not been done. If left until later in the planning process,

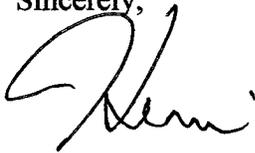
the public could feel disenfranchised, and 2) without a clear Purpose and Need it will be difficult for the planning team to identify meaningful alternatives.

There is currently designated Northern Spotted Owl Critical Habitat (August 2008) and proposed new Critical Habitat (March 2012) that must be considered in these revisions. The Fish and Wildlife Service's website says the proposed Critical Habitat will be final in mid-November 2012. PLF notes that the BLM published schedule shows the Formulation of Alternatives will be completed in October 2012. This is before the proposed Critical Habitat is finalized.

The PLF is concerned that the published schedule does not include Planning Criteria required by 43 CFR 1610.4-2 (which also includes public comment) or Analysis of the Management Situation required by 43 CFR 1610.4-4. Missing these steps could lead to likely loss in a court challenge under the Administrative Procedures Act.

The PLF recommends that the schedule be changed to include the Analysis of the Management Situation and the development of Planning Criteria before formulation of alternatives begins. These documents can be used to provide the necessary focus as well as a clear Purpose and Need for the Revisions. Finalizing the alternatives should not be completed until the Critical Habitat has been fully incorporated.

Sincerely,

A handwritten signature in black ink, appearing to read "Henri Bisson". The signature is fluid and cursive, with a large initial "H" and "B".

Henri Bisson, President

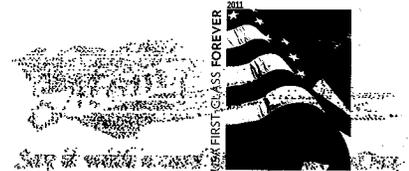


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