

# Hugo Neighborhood Association & Historical Society

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Orville Camp, Author (Title?)  
*Forest Farmers Handbook: A Guide to Natural Selection Forest Management* (1984)  
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Subj: National Environmental Policy Act (NEPA) Purposes of Josephine County (JO CO)  
*Justice System Public Safety Services (JSPSS) Study Design: 2015 Project: NEPA Analysis of a Range of Reasonable Citizen Alternatives & Analysis of the Significant Impacts of Those Alternatives*

Dear Mary:

I try to summarize to my brainstorming with you, Saturday, March 11, 2017, about citizen comments on alternatives and impacts of a BLM timber sale EIS/EA as they relate to the 2017 *Natural Selection Alternative, Deer Creek Watershed Pilot Project (NSA)*.

1. Comments on analysis of “reasonable” BLM NEPA timber sale alternatives. Analyze all alternatives, including a citizen proposed *Natural Selection Alternative, Deer Creek Watershed Pilot Project*, for compliance with BLM legal “reasonable alternatives” requirements (NEPA references: Selected Council of Environmental Quality (CEQ) Regulations For Implementing The Procedural Provisions of NEPA; Selected Portions Of CEQ’s 40 Questions; Selected Parts Of BLM NEPA Handbook: H-1790-1; U.S. Department of the Interior’s Manual Guidance on the National Environmental Policy Act of 1969 (516 DM 1-7) etc.).
2. Comments on “significant” impacts, or non-significant impacts, from those reasonable alternatives. Analyze all alternatives, including a citizen proposed *Natural Selection Alternative, Deer Creek Watershed Pilot Project*, for compliance with BLM legal “significant impacts” requirements (NEPA References: CEQ Regulations For Implementing NEPA; CEQ’s 40 Questions; BLM NEPA Handbook; USDI NEPA Manual; etc.).

My brainstorming with you directly relates to Hugo’s project for the last four years - *Justice System & Public Safety Services Study Design: 2015 project (Study Design)* (Josephine County’s public safety issue) and its “Impact Methodology Model” (NEPA References).

I also read again the Hugo Justice System Exploratory Committee's Outreach 10 publication - *Aspiration Letter From Authors Of Study Design*. I feel that from an informed citizens point of view, it could have been written for the Deer Creek Valley Natural Resources Conservation Association (DCVNRCA). The overlap is that the Hugo Justice System Exploratory Committee used NEPA to design the *Justice System & Public Safety Services Study Design: 2015* project (NEPA References).

Sincerely,

Mike :)

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**NEPA REFERENCES**  
**Justice System & Public Safety Services Study Design: 2015**  
Justice System Exploratory Committee  
<http://www.hugoneighborhood.org/justicesystemexploratorycommittee.htm>

**Draft March 13, 2017**

**Justice System & Public Safety Services Issue Scope Of Work: 2013**

Justice System Exploratory Committee  
<http://www.hugoneighborhood.org/justicesystemexploratorycommittee.htm>

Adequate information for the proposed JS&PSS Study is the standard. See following Chapter III Justice System & Public Safety Services Issue Scope of Work.

**Justice System & Public Safety Services Study Design: 2015**

Justice System Exploratory Committee  
<http://www.hugoneighborhood.org/justicesystemexploratorycommittee.htm>

Chapter (Intro) ARGUMENTS FOR SUPPORTING STUDY DESIGN (Table Talk - See Chpt XVI)  
Section 2. "Purpose Of Study relating to impact methodology.

*A significant Study compliance standard is for the Study team to use a impact methodology model. The most important concept of the "impacts methodology" is that it uses the scientific method - it is not rocket science, but the process is logical, and traceable, and is available to the public, agencies, and governments for review. It will also identify the process to determine whether an impact is significant, or not, and the rationale to support the significance determination.*

Chapter II. PURPOSE (pps. Chpt II 1 -2)

Section A. "Human Face Of Justice System & Public Safety Services Study Design"

Goal 1, Objective 2. Identify preliminary qualitative impacts of each alternative evaluated by condition indicators and standards by the public. Objectives are specific achievements to help reach the goal. Typically, they're measurable and have a timeline.

Goal 2, Objective 2. Analyze the impacts of each alternative evaluated by condition indicators and standards through a combination of citizen input and professional expert analysis.

Section B. Justice System & Public Safety Services Study, Josephine County, Oregon

Section 1. Study Grant

Section a) Purposes

- Promote informed decision-making by making "detailed information concerning significant impacts" available to both the public and government leaders.
- A full disclosure document that details the process through which the JS&PSS study project was developed, includes a range of reasonable alternatives, analyzes the potential impacts resulting from the alternatives, and demonstrates compliance with the law, or not.

Chapter III. JUSTICE SYSTEM & PUBLIC SAFETY SERVICES ISSUE SCOPE OF WORK

Section B. Hugo Justice System & Public Safety Services Exploratory Committee (pps. Chpt III 2 - 3). Adequate information for the proposed JS&PSS Study is the standard. An adequate information assessment/analysis has several elements and a conclusion of adequacy (Scope, p. 6).

- Information Is Understood Or Not
- Supporting Arguments Are Made Or Not
- Standard(s) of Review
- Applicable Evidence/Facts

- References and Sources of Information
- Compliance With Adequacy Information Analysis Elements Or Not

## Chapter VI. PROCEDURAL REQUIREMENTS

Section A. Procedural Requirements For JS&PSS Study Design (pps. VI 1 - 2; Appendix D1)

Section B. Impact Methods (pps. VI 3 - 6; Appendix D1; USDOA, USFS, Rocky Mountain Research Station. October 2010. *Numerical Visitor Capacity: A Guide to its Use in Wilderness*. Fort Collins, CO)

Section VI.B.2. Significant Impact Methodology. There is a high correlation between the requirements of the JS&PSS Design Study impacts process and the Wild & Scenic Rivers Act (WSRA) and NEPA when it comes to threshold determinations of whether the impacts of a major action significantly affects the quality of the human condition. It is interesting and significant that both the WSRA and NEPA became law in the same year - 1968. They both have principles of carrying capacity and thresholds performing exactly the same task.

1. JS&PSS Design Study significant impacts with indicators and standards.
2. NEPA significant impacts with indicator and thresholds or standards
3. NEPA carrying capacity with indicators and thresholds or standards
4. WSRA user capacities (carrying capacity) indicators with standards (thresholds)

Section C. Analysis Documentation & Method (p. VI 7)

Section D. Basic Impact Methodology Model (pps. VI 8 - 10; Appendix B1; Appendix D1)

## Chapter VII. STUDY DESIGN (pps. VII 1 - 3)

Section A. Introduction

Section B. Contract Compliance Impact Methodology

1. Significant Issue
2. Significant Impact
3. Affected Condition
4. Indicator
5. Standard
6. Significance Determination

## Chapter IX. RANGE OF ALTERNATIVES (pps. IX 1 - 2)

Section A. Introduction

1. JO CO Justice System & Public Safety Services
2. Background
3. Introduction To [Reasonable] Alternatives
  - a) What is meant by "range of alternatives"?
  - b) How many alternatives have to be discussed when there is an infinite number of possible alternatives?
  - c) Should JO CO consider alternatives outside its capability?
  - d) What does the "no action" alternative include?
  - e) Is the analysis of any future CO's "proposed measure/levy" to be treated differently from the analysis of other alternatives?
  - f) What is the difference between "alternatives" and "impacts"?

## APPENDICES to Justice System & Public Safety Services Study Design: 2015

[http://www.hugoneighborhood.org/JSPSS\\_Appendices.htm](http://www.hugoneighborhood.org/JSPSS_Appendices.htm)

- Appendix A. Issues
- Appendix A1. Being Heard
- Appendix A2. All Values Are Legitimate
- Appendix B. Affected (emphasis added)
- Appendix B1. Potential Affected Conditions
- Appendix B2. Studies & Information
- Appendix B3. Analysis of Public Situation
  
- **Appendix C. Alternatives** (emphasis added)
  
- **Appendix D. Procedural Requirements** (emphasis added) (Appx. D pps. IV 1 - 38)  
Chapter IV. PROCEDURAL REQUIREMENTS  
Section A. Selected Parts Of BLM's NEPA Handbook: H-1790-1 (Appx. D pps. IV 1 - 5); Dept of the Interior's Manual Guidance on the National Environmental Policy Act of 1969 (516 DM 1-7)  
Section B. Selected CEQ Regulations For Implementing The Procedural Provisions of The National Environmental Policy Act (Appx. D pps. IV 6 - 12)  
Section C. Selected Portions Of CEQ's 40 Questions (Appx. D pps. IV 13 - 16)  
Section D. Evaluation Of Significant Impacts Model And Recommended Impact Methodology (Appx. D pps. IV 17 - 34)  
Section E. NEPA's Significantly, *Scoping Rogue River's Outstandingly Remarkable Values* (Appx. D pps. IV 35 - 38)
  
- **Appendix D1. Impact Methodology Model** (emphasis added)  
Chapter IV. PROCEDURAL REQUIREMENTS (Appx. D1 pps. IV 1 - 6)  
Section A. Procedural Requirements For JS&PSS Study Design  
Section 1. Logical and Coherent Record  
Section 2. Procedural Standards  
Section 3. Impact Methodologies  
Section B. Impact Methods  
Section 1. Introduction  
Section 2. Significant Impact Methodology  
Section C. Analysis Documentation & Method  
Section 1. Information Statements by Government and Other Publications, Including News Articles  
Section 2. Information Statements Should  
Section 3. Analysis Method  
  
Chapter V. BASIC IMPACT METHODOLOGY MODEL (Appx. D1 pps. V 1 - 5)  
Section A. Basic Impact Methodology Model  
Section 1. Legal Requirements .  
Section 2. Basic Impact Model  
Section B. Contract Compliance Impact Methodology

- **Appendix E. Impacts** (emphasis added)

### NEPA Design Group's Comments on the Hellgate RAMP/DEIS: 2001

Procedural Requirements, was adapted from Chapter II, Procedural Requirements, *NEPA Design Group's Comments on the Hellgate RAMP/DEIS*.

NEPA Design Group. February 15, 2001. Chapter II, Procedural Requirements, *NEPA Design Group's Comments on the Hellgate RAMP/DEIS*. Prepared for Bureau of Land Management, Medford District Office, United States Department of Interior. Hugo, OR.

BLM's NEPA Handbook: H-1790-1

*The purpose of this handbook is to provide instructions for complying with the Council on Environmental Quality's (CEQ) Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR Parts 1500-1508) and the Department of the Interior's manual guidance on the National Environmental Policy Act of 1969 (516 DM 1-7).*

*The objectives of this Handbook are: "... to ensure a logical and coherent record of NEPA compliance within the BLM..."*

Department of the Interior's Manual Guidance on the National Environmental Policy Act of 1969 (516 DM 1-7)

## **Scoping Rogue River's Outstandingly Remarkable Values: 2014**

[http://www.hugoneighborhood.org/OutstandinglyRemarkableValues\\_DraftFINAL120814.pdf](http://www.hugoneighborhood.org/OutstandinglyRemarkableValues_DraftFINAL120814.pdf)

- Hugo Neighborhood Association & Historical Society, Rogue Advocates, & Goal One Coalition. Preliminary Draft December 8, 2014. *Scoping Rogue River's Outstandingly Remarkable Values, Other Similar Values, & Other River Values.* Hugo, OR.

### **Appendix C. NEPA's Significantly**

## **OUTREACH - JUSTICE SYSTEM EXPLORATORY COMMITTEE**

Justice System & Public Safety Services Study Design: 2015

<http://www.hugoneighborhood.org/justicesystemexploratorycommittee.htm>

### **Outreach**

[http://www.hugoneighborhood.org/JSPSS\\_Outreach.htm](http://www.hugoneighborhood.org/JSPSS_Outreach.htm)

- Outreach 1.1. What's the Problem?
- Outreach 1.2. Arguments For Supporting Study Design
- Outreach 1.3. Summary Highlights: Arguments For Supporting Study Design
- Outreach 1.4. Introduction To Justice System Exploratory Committee's Study Design Web Page
- Outreach 2.1. Interested In Becoming Involved?
- Outreach 3.1. Publicly Identified Problems/Issues
- Outreach 3.2. Summary Highlights: Publicly Identified Problems/Issues
- Outreach 3.3. Understanding Citizen Motivations for Public Safety Referenda in Josephine County
- Outreach 4.1. Publicly Identified Range Of Alternative Solutions
- Outreach 4.2. Summary Highlights: Publicly Identified Range Of Alternative Solutions
- Outreach 5.1. Vetted Public Safety Facts
- Outreach 5.2. Summary Highlights: Vetted Public Safety Facts
- Outreach 5.3. Summary Highlights: Study Design Research Projects Prior To Phase 3 Contracted Study
- Outreach 5.4. Summary Highlights: Using CA To Identify JO CO Citizens's Public Safety Values: 2012 - 2015
- Outreach 5.5. Summary Highlights: JO CO's MALPSS Research Project
- Outreach 5.6. Executive Summary: JO CO's Minimally Adequate Level Of Public Safety Services (MALPSS)
- Outreach 5.6.1. Study Design Web Publications On MALPSS
- Outreach 5.7. 2013 Josephine County Community Health Assessment
- Outreach 5.8. Summary Highlights: 2013 Josephine County Community Health Assessment
- Outreach 6.1. Study Design's Planning Horizon Is Flexible
- Outreach 6.2. Summary Highlights: Study Design's Planning Horizon Is Flexible
- Outreach 7.1. Table Talk Discussion Script
- Outreach 8.1. How To Communicate In Plain Language
- Outreach 9.1. JS&PSS Issue Overview Educational Brochure
- **Outreach 10. Aspiration Letter From Authors Of Study Design** (emphasis added)
- Outreach 11. Enquiry Stakeholder Letters/Emails (50 plus sent to Stakeholders)