

Writing substantive and effective comments

– your guide to making a difference

Commenting on federal agency actions – draft plans, NEPA documents, and the like – is your opportunity to have a voice in land management decisions. Public comment periods are intended to allow the public to provide relevant information to federal land managers that will help them make the best decision, or write the best plan, possible. The purpose of commenting is not to simply tell an agency that you do or do not like about their proposed action, and agencies do not make decisions based on how many “votes” a particular proposed action receives.

Land managers want to receive *substantive* comments from the public. Substantive comments are clear, concise, and should offer constructive criticism. Vague values-based statements don’t require a response from the agency and are generally ignored. However, it *is* important to outline your personal connection to the issue at hand. Briefly explain how the proposed action impacts you and the activities you do, and include enough detail to establish yourself as an authority on the issue or area in question.

When commenting it is important to address how the issue at hand will affect the environment and your ability to use or enjoy public lands. While there may be any number of reasons that you find problems with a document, your comments should clearly state why the issues you identify are problematic. If you are supportive – whether in whole, or in part – state that and explain why. Whenever possible, support these comments with reputable sources of information or relevant background, including well-documented personal experience. In addition, it is important to present a solution to the problems you identify. By presenting solutions – including specific remedies or exact language – you provide the agency with important information on how they can improve the proposed action.

In addition to offering constructive criticism, your comments may present relevant new information and

reasonable alternatives. As with comments that challenge the document, these comments must be supported by verifiable data, reputable studies, or other information such as maps, photos, and well-documented personal experience.

It is important to comment at the earliest stage possible, as well as during subsequent opportunities. The earlier you get information to an agency the more likely it is that they will incorporate it into their final decision. In addition, by getting involved early, you develop standing on an issue, which is required if you decide to challenge the final decision.

Useful tips for comment writing:

- **Start by making a case for yourself – explain your relationship to and history with the area or issue in question and state how the proposed action will affect your use experience on public lands.**
- **Highlight what you agree with or feel the agency has done right in the proposed action or plan. While the primary purpose of the comment period is to offer ways to improve the proposed action, it is always good to start on a positive note and acknowledge when the agency is on the right track. If you agree with all or part of the proposed action provide information to support this – show how the proposed action will improve your experience with public lands.**
- **Identify problems with the proposed action and offer solutions to fix or improve them.**
- **Provide verifiable data and information from reputable sources to support your comments.**
- **Federal agencies may not be aware of the most recent scientific information available on any given issue – if you are aware of new studies that are relevant to the proposed action summarize these studies in your comments and include a copy of the paper or report.**
- **Maps are very helpful. If you spend time in the area in question and can provide a map showing specific places within that area that you use and how you access them it will help the agency better understand how the public utilizes the land.**
- **GPS coordinates and/or photos are a good way to document cultural or historic sites and rare or endangered plants and animals that may be impacted by the proposed action.**