How to Craft a

# Substantive Comment

NATIONAL SYSTEM OF PUBLIC LANDS

U.S. DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

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# What is a Substantive Comment?

- Provides new information
- Identifies a way to meet a need
- Points out specific flaws in analysis
- Gives an alternative with supporting facts or evidence
- Identifies parts of the plan or analysis that are unclear

## Important Elements of a Substantive Comment

- Clear, specific rationale
- Supporting documents, photos, latest scientific studies, or other factual evidence & information
- Demonstrated impact or likely potential for impact
- Unique comments rather than form letter
- Specific location data, e.g. GPS coordinates
- Contact info for follow-up

#### Example of a Substantive Comment

"The reasoning for closing Route XYZ in this TMP is flawed. As evidenced by the attached photos, dated October 2023, this road is very well maintained and accessible. While it is labeled redundant in the plan, this track avoids a nearby cultural site in a more practical way than other social trails."

#### Avoid:

- Unrelated topics or projects
- Only voicing opinions
- Simply "voting" for a proposed action or alternative
- Emotional stories without facts
- Form letters, which are treated as one comment

## Example of a Non-Substantive Comment

"We should not be closing any roads. This is public land. I don't like any of the closures in the action alternatives. You should choose Alternative A."

#### **Making Your Comment**

- Visit the project's ePlanning page
- Click "Participate Now" to provide electronic comment or to find other options available
- Submit your comment within the public comment period time frame

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