

## Importance of Substantive Comments

During the Scoping Period, there were 1476 total submissions of comments. Only 30 were deemed “Substantive”

### How to make a Substantive Comment

Crafting a comment that qualifies as "substantive" is key to getting your concern addressed! A substantive comment identifies an issue you have with the document, says why it's a problem, and offers other factual and unbiased information for the Bureau of Land Management to consider.

#### Qualities of a substantive comment:

- References document pages, chapters or sections and uses objective information.
- Uses facts to question the adequacy, accuracy, methodology, or assumptions of the analysis.
- Presents traditional or ecological knowledge.
- Proposes a reasonable new alternative or revision to the alternatives presented.
- Identifies a passage in the document that is unclear.

#### Things that do not qualify a comment as substantive and won't be addressed:

- Stating that you want your comment recorded as "substantive."
- Crafting an emotionally compelling story without facts.
- Stating only that you agree or disagree with a policy, resource decision, analysis finding or presented alternative.
- Asking vague or open-ended questions.
- Commenting on unrelated projects.

#### Tips for making a substantive comment

Include any knowledge, experience or evidence as it relates to your observations and comments

- Provide GPS readings or landmarks, if possible, when referring to specific locations.
- Present new information.
- Share issues relevant to the environmental analysis.
- Suggest alternatives to the proposed project and the reason(s) why they should be considered.
- Avoid comments like "I don't like this" or "I do like this".
- Remember that identical comments are treated as one comment, including form letters.

**Example of a Substantive Comment** I disagree with closing Route 245A in Alternative E. I need the road to access my private land.

**Example of an Unhelpful Comment** Stop closing our roads.

**Assistance with Comments:** If you would like help making your comment substantive, draft your statement and email it to [Rose@UtahPLA.com](mailto:Rose@UtahPLA.com) She will review it and suggest changes that will make it count!