

Substantive Comments: Effective engagement in BLM planning

Public lands are precisely that: lands for and owned by the public. American citizens play a pivotal role in determining management for approximately 250 million acres of public land managed by the Bureau of Land Management. For this reason, it is critical that the public make their voices heard for the protection of lands, resources, and values that matter. One of the best ways to do this is through written, substantive comments to the agency. Incorporating the writing tips below will help make sure comments are most effective for influencing plans and projects on our public lands.

- **The most important thing to remember about making substantive comments is to be specific. Make a specific recommendation, suggestion or call for correction.**

The Basics of Substantive Comment Writing

- **Advocate for actions considered across the range of alternatives.**
 - You don't need to support just one alternative. Point out elements from multiple alternatives that you think should be included in the proposed action. A final action should blend the best elements.
- **Identify gaps in the accuracy of the information in the document.**
 - Agency decisions are informed by data; whether facts on the ground or relevant science. BLM should be working with recent and quality datasets. Planning documents should provide the public with a full picture of resources, resource-uses, and conditions that would be affected by a management action.
- **Question the adequacy of methodology or assumptions put forth in the environmental analysis.**
 - BLM should demonstrate clear methods and logic used in making conclusions. Even if working with all relevant data, impact analysis may fall short in detailing the extent and intensity of a proposed action. BLM should disclose short-term, long-term, direct, indirect, and cumulative impacts.
- **Present additional and relevant information.**
 - BLM's analysis may omit important considerations for a proposed action - data from the field, scientific research, past BLM actions, and personal experiences, for example, can better inform BLM decisions.
- **Present a reasonable alternative to those analyzed.**
 - There are a number of ways to accomplish a purpose and need for a proposed action. Providing an alternative, detailed approach and rationale can result in a new pathway for a proposed action.

More Tips

- Share personal experiences with public lands resources that may be affected, such as places you enjoy hiking or wildlife viewing.
- Bring in reputable sources such as scientific studies, recent articles and research papers.
- Provide supplementary material like maps, GPS locations and pictures.
- Ask to be informed of developments and information relating to an action, and ask for any information that might assist you in your involvement.
- Recognize and support good aspects of the BLM's draft and proposed plans.
- If appropriate, request a meeting or field trip with BLM staff.

The Wilderness Society's BLM Action Center is here to help. Contact us at blmactioncenter@tws.org