



How to make a Substantive Comment

BLM Utah

A vital piece of the BLM's NEPA planning process is the public comments received. These comments help shape how different projects are finalized. A common misconception is that any comment about the plan is a substantive one, like voting for which alternative is best. This quick guide will help constituents through the public comment process to make sure their concerns are addressed.

Public comments are made on the project page at eplanning.blm.gov.

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, or other factual evidence & information
- Demonstrated impact or likely potential for impact
- Unique comments rather than a form letter
- Personal information in case follow-up is needed
- Specific location information, e.g. GPS coordinates or route number

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 Substantive Comment

"The reasoning for closing Route XYZ in this TMP is flawed. As evidenced by the attached photos, dated January 2024, this road is very well maintained and accessible. While it is labeled redundant, this track avoids a nearby cultural site in a more practical way than other social trails."

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 Alternative B."