

## **Substantive Comments**

“To be most helpful, comments should be as specific as possible. A substantive comment provides new information about the Proposed Action, an alternative or the analysis; identifies a different way to meet the need; points out a specific flaw in the analysis; suggests alternate methodologies and the reason(s) why they should be used; makes factual corrections, or identifies a different source of credible research which, if used in the analysis, could result in different effects.”

### **Excerpts from the NEPA Handbook 6.9.2.1**

Substantive comments do one or more of the following:

- question, with reasonable basis, the accuracy of information in the EIS or EA.
- question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis.
- present new information relevant to the analysis.
- present reasonable alternatives other than those analyzed in the EIS or EA.
- cause changes or revisions in one or more of the alternatives.

Comments that are not considered substantive include the following:

- comments in favor of or against the proposed action or alternatives without reasoning that meet the criteria listed above (such as “we disagree with Alternative Two and believe the BLM should select Alternative Three”).
- comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the criteria listed above (such as “more grazing should be permitted”).
- comments that don’t pertain to the project area or the project (such as “the government should eliminate all dams,” when the project is about a grazing permit).
- comments that take the form of vague, open-ended questions.

### **Quotes from web pages...**

- Substantive comments often address one or more of the following:
  - o New scientific information or data that would have a bearing on the analysis;
  - o Errors in the analysis, assumptions, methodology, or conclusions;
  - o Misinformation that could affect the outcome of the analysis;
  - o Requests for clarification; or
  - o A substantive new alternative with a mix of allocations that differs from those under any of the proposed alternatives.
- Comments will be most helpful if you can state specifically what you like and what you don't like, and what improvements you think can be made. Suggest changes and be specific. It is helpful if you can reference a section or page number.

- Public comment on RMPs is not a **voting** process. BLM must treat identical comments as one comment. It is more important to raise unique issues that are important to you than it is to reiterate someone else's comment. Comments containing only **opinion** or preferences will be considered as part of the decision making process, but they will not receive a formal response from the BLM.
- Be sure to tell us what concepts you do support, not just those you don't like. Without support, good actions run the risk of being revised.

## Examples

### Substantive Comments

#### --Suggesting a new alternative;

"I would like to comment on the Draft EIS Upper Siuslaw Late Successional Reserve Restoration Plan. Giustina Resources owns and manages timberlands within one mile of the boundary of the proposed project area. Our concern about the proposed and other alternatives is how the management of these forests may impact the health and survival of our company's forest resources. More specifically, we are concerned about increased risks of fire and epidemic insect populations as a result of leaving cut trees on the ground and predisposing remaining uncut trees to windthrow. Perhaps another alternative could be developed that would allow multiple density reduction entries and would remove a high percentage of the merchantable wood during each entry. This would allow a gradual opening of the stand thereby reducing the magnitude of windthrow damage and would not provide the vector for epidemic populations of Douglas-fir bark beetles or Ambrosia beetles."

#### --Questioning the analysis and suggesting a new alternative;

"The EA should have had a better discussion (in light of recent research results) of the anticipated impacts and benefits of thinning on the different age classes of trees in the different harvest units. The EA should have had another alternative that considered deferring harvest of the older stands."

### Non-substantive Comments

#### --Comment on topic unrelated to the NEPA document under review;

"Also, the use of chemical fertilizers and chemical/biological pesticides at the Tyrrell Seed Orchard near Lorane should be replaced with non-chemical means, to prevent impacts on the upper reaches of the Siuslaw in order to aid the restoration of the Late-Successional Reserves farther downstream, and to maximize the benefits to the endangered species."

#### --Simply disagreeing with the proposed action

"Finally, we are opposed to what appears to be a very aggressive road closure program. In spite of what many "ologists" contend, roads for management and fire protection are very valuable. If indeed there are some sections that create water quality problems, then close or fix them. However, destroying 45 miles of road in a basin this size is an ill-conceived idea. "

#### --Simply agreeing with a BLM policy

"I appreciate the seasonal restrictions on yarding and hauling activities. Such restrictions serve to reduce compaction thus maintaining soil productivity, and reduce sedimentation of streams."