



How to make a Substantive Comment

Utah how-to guide

Crafting a comment that qualifies as “substantive” is key to getting your concern addressed. A substantive comment identifies a concern or issue you may have with the document, describes why it’s a problem, and offers other factual and unbiased information for the Bureau to consider.

Qualities of a substantive comment:

- Includes specific references to pages, chapters or sections of the document and use objective information
- Uses facts to question the adequacy, accuracy, methodology or assumptions of the analysis
- Presents relevant new information
- 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 information we can act on
- Simply stating 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
- Repeating someone else’s comment

Tips for making a substantive comment:

- Be as clear and as concise as possible.
- Refer to a chapter, section or page number of the referenced document.
- 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.

Examples of substantive comments:

"BLM's analysis of local groundwater quantity is insufficient. A 2016 study from the University [source and citation] offers a more complete understanding of drought impacts to the aquifer in question, and should be incorporated into the environmental analysis to better inform the decision with regards to the proposed rangeland well's water resource impacts."

"BLM's assessment of the affected environment for recreation is incorrect. The southern slopes of this area are popular areas for bouldering, bird watching, and backcountry camping. This is not recognized. In each alternative, the proposed mining project would limit access to these places and create noise and visual impacts which would degrade the experience of recreation. BLM should correct this analytical omission."

Examples of non-substantive comments:

"This project should be denied. It's just another attempt by the agency to give away the public lands that local communities depend on for their livelihoods."

"BLM should not authorize the new mountain bike trails. No matter what the so-called analysis says, I know mountain bikers are bad for the environment and don't help the economy."