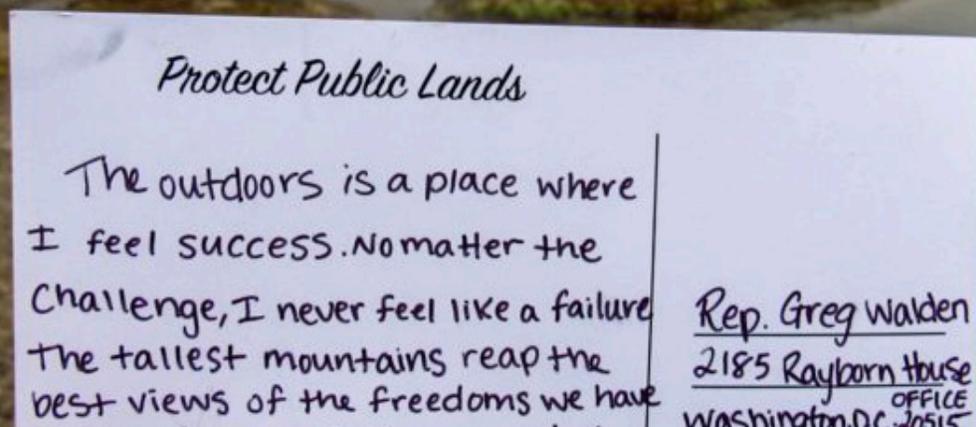


# Writing Comments on BLM Plans & Proposals



Brittany Leffel

Public participation is at the heart of the BLM planning process, allowing those who own these public lands, the American public, a voice in the management of one of our country's greatest assets.

Comment periods are an important opportunity for the public to provide input about how their public lands are managed. Below are a few tips to help you express your thoughts about how public lands should be managed.

## 5 Tips for Your Letter

1. Support Your Point – This can be personal observations, experience or cited sources.
2. Avoid Vague Statements – Specifics help the agency to consider and evaluate the issue you have identified.
3. Provide Detail - Describe the issue, what can be done, the specific location, what resources are involved, etc.
4. Present Solutions – Include a potential fix to the problem you have identified.
5. Craft a “Substantive” Comment – BLM defines a substantive comment as one that: 1) Questions the accuracy, methodology or assumptions used in the analysis, 2) Presents new information or reasonable alternatives not analyzed, or 3) Causes changes or revisions.

**SEE BACK FOR EXAMPLES**



## Examples of Substantive Comments

### Example 1:

“None of the alternatives restrict motor vehicles, ATVs and dirt bikes to designated routes. That failure will lead to continued degradation of sage-grouse habitat, as ATVs and dirt bikes roam, creating still more routes that subdivide blocks of habitat. “Existing routes” in many cases are excessive routes, including unplanned and redundant ORV tracks. Some should be closed to prevent further degradation of habitat.”

### Example 2:

“Livestock grazing also leads to cheatgrass invasion, as overgrazing eliminates native bunchgrasses and degrades biological soil crusts, both of which represent the ecosystem’s natural defenses against this invasive weed (Reisner et al. 2013, Attachment 18). In order to minimize the spread of cheatgrass, livestock forage removal limits need to be set under the RMP amendment, allowing no more than 25% of the available forage to be consumed each year (see Braun 2006, Holechek 2010). BLM must restore degraded habitats by managing for elimination of cheatgrass from the system.”

### Example 3:

“Several alternatives are purported to reduce fire risk through the construction of fire-breaks. Where is the science indicating that constructing fuel breaks reduces fire risk or extent?”

## Examples of Non-Substantive Comments

### Example 1:

Simply disagreeing with a proposed action.  
“I do not support Alternative D.”

### Example 2:

Simply stating an opinion.  
“Protect our resources!”

### Example 3:

Commenting on something outside the scope plan or proposal.  
“Please extend your office hours for those who work between 8-5pm Monday-Friday.”