



How to make a Substantive Comment

How-to guide

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

Qualities of a substantive comment:

- References document pages, chapters or sections and uses objective information.
- Uses facts to question the adequacy, accuracy, methodology, or assumptions of the analysis.
- Presents traditional or ecological knowledge.
- 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 facts.
- Stating only 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.

Tips for making a substantive comment:

- Include any knowledge, experience or evidence as it relates to your observations and comments
- Provide GPS readings or landmarks, if possible, when referring to specific locations.
- 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.

Check out these examples of substantive comments:

“Page 190: Table 3.4-8. Nuiqsut annual cycle of subsistence activities. The table draws from a number of different sources, including Alaska Department of Fish and Game subsistence reports. While seasonal subsistence activities are accurately represented, how were the potential impacts to subsistence activities characterized into high, moderate, and low categories? Please clarify.”

“It would be helpful if tables 4.2-17 A & B included columns with the background concentrations, similar to tables 4.2-20 and 4.2-21. That way it is easier to see the project impact to the near-field as well as the impact to the community of Nuiqsut.”

Example of a Substantive Comment

I disagree with closing Route 245A in Alternative E.
I need the road to access my private land.

Example of an Unhelpful Comment

Stop closing our roads.