Tips for Providing Effective Comments on a Draft Environmental Impact Statement

Public participation is an important part of the National Environmental Policy Act (NEPA) process. Submitting substantive and concise comments on the Draft Environmental Impact Statement (DEIS) is one of the most important aspects of that process.

Here are some general recommendations to keep in mind when making comments on any NEPA document:

- Request to be included on the EIS mailing list to receive notification of public meetings and project information.
- Review the project or agency website, monitor local newspapers, attend public meetings, and become familiar with the proposed project. The website for the HB In-Situ Solution Mine Project EIS is http://www.nm.blm.gov/cfo/HBIS/.
- Learn about the NEPA process and when comments will be accepted by BLM.
- Keep your comments focused on the specifics of the proposed project under consideration.
- Become familiar with the responsibilities and authorities of the federal agency making the decision.
- Submit your comments within the timeframes announced to ensure that your concerns are considered and addressed in the Final EIS.

The most effective comments are those that provide useful information to the BLM. Comments on the DEIS are not counted as votes or as part of a referendum on BLM decisions. They are used to improve the document and analyses, and to ensure that the impacts are adequately determined before the BLM makes a final decision on the proposed project. Therefore, avoid comments that state “I am in favor of this project” or “I am opposed to this project.” Remember that the more clear, concise, and relevant to the DEIS your comments are, the more effective they will be and the more likely it is that they will be utilized to improve the final documents and affect the agency decisions.

The most effective comments are developed using the guidelines listed below.

- Become familiar with the contents of the DEIS, including the purpose and need statement and the responsibilities of the lead agency (BLM).

- Recognize that the potential impacts to resources are likely to be described in more than one section because there are interrelationships between the resources and programs. For example, project-related surface disturbance may affect soils, vegetation, surface water, wildlife habitat, and livestock grazing. In this case, the relevant potential impacts from surface disturbing activities will be described within the soils, water resources, vegetation, biological resources, and rangelands/livestock grazing sections of Chapter 4 (environmental consequences). If you only read the water resources section, you will overlook the full impact analysis.

- Be as specific as possible with your comments and refer to page numbers and paragraphs in the DEIS.

- Back up your statements with explanations, facts, and references, as appropriate.

- Support statements with details. If, for example, you are concerned about biological resources, it is helpful to focus on a particular problem or issue, such as a species that you feel was not sufficiently analyzed, instead of making a broad statement such as “the document did not adequately analyze the impacts to biological resources.”

- Submit comments if you find:
  - An error in analysis that may affect the outcome.
  - New information that would change the analysis and conclusions.
  - Something that should be clarified.
  - A substantially different alternative that meets the purpose and need statement and has not been considered.