



WCFP's Forest Keeper's Public Comment Guide



Turning Care into Comments BLM Can Hear

People come to BLM meetings because they care about the land. That care matters. BLM decision processes are designed to act on **evidence, impacts, alternatives, and legal requirements**—not values statements alone.

If you want your concern to shape what happens on the ground, it has to be translated into a form the existing process can use. You don't have to change what you care about. You just have to express it in a way the BLM can understand and act on.

BLM Scoping vs. Environmental Assessment (EA) Phases

Scoping (Early Phase): Shape what gets **Include:**
“Please analyze ___ and include an alternative that ___.”

EA (Detailed Action Phase): Improve the **Activity:**
“On page ___ / Map __, the EA states __. This is incomplete because __.
Please revise by ___ / analyze ___ / adopt condition ___.”

Forest Keeper Comment Formula

Make sure you are familiar with the PURPOSE, ISSUES, and GOALS of the BLM project first and foremost. Comments should be related to the specific project purpose/issues/goals.

CARE → WHERE → RESOURCE → IMPACT → FIX

CARE – Why you're paying attention (one sentence).

- *Example:* “I care about this area because my family walks here every week.”
- *Example:* “I care about this place because it's one of the few intact forest stands.”

WHERE – Anchor your concern to a real place and to the EA.

- On the ground: unit, road, drainage, trail, ridge, creek
 - *Example:* “In Unit 29 near the seasonal creek shown on Map 4...”
- In the document: page #, map #, figure #, section

- *Example:* “On page 37 / Figure 12, the EA describes road work along Road 420...”

RESOURCE – Name the specific thing at risk.

(water, wildlife, access, canopy, quiet, roads, cultural sites, etc.)

- *Example:* “This area includes a year-round creek and wet soils.”
- *Example:* “This ridge provides interior forest canopy and quiet recreation.”

IMPACT – Describe what could happen and why it matters.

(sediment, habitat loss, fragmentation, noise, visual change, access loss, safety)

- *Example:* “Equipment use here could increase sediment into the creek.”
- *Example:* “Road work and thinning could reduce quiet use and fragment canopy.”

FIX – Ask for a concrete, site-based change.

- revise text or maps
- add missing analysis
- modify the treatment (buffers, timing limits, avoidance areas)
- add monitoring or safeguards
- choose a different alternative (and say why)

EA Fill-In Template (using the flow above)

“I care about this area because ____.
 In ____ (unit/road/drainage/trail), on page ____ / Map ____, the EA states ____.
 This location includes ____ (resource).
 This is incomplete because ____, and it could result in ____ (impact).
 Please revise by ____ (specific change/condition/analysis).”

From Heartfelt to Actionable

Heartfelt statement	What it’s really about	EA-ready comment template (with placeholders)
---------------------	------------------------	---

<p>“This forest is part of who we are. It’s where our kids learn and where we feel grounded.”</p>	<p>Recreation, family use, sense of place</p>	<p>On page ___ / Map ___, the EA states ___ about recreation/public use/visual conditions in Unit ___ near ___ (trailhead/road). In this location, this is incomplete because ___ (e.g., the area is heavily used by families; trail use is not documented; key access points aren’t mapped). This matters because the project may affect ___ (shade, safety, trail experience, access, noise, visual character). Please revise by (1) analyzing recreation and community use in Unit ___ / along ___, and (2) adopting mitigation such as ___ (retain canopy along trails, limit operations near trailheads during peak use, maintain pullouts/parking, signage/closures plan).</p>
<p>“This place gives me peace and perspective. I’m afraid of losing that.”</p>	<p>Quiet use, soundscape, intactness</p>	<p>On page ___ / Figure ___, the EA states ___ regarding noise/operations/road work and its effects on recreation or visitor experience. In Unit ___ / along Road ___ / near ___, the EA does not analyze ___ (duration, timing, equipment noise, truck traffic) or baseline quiet conditions. This matters because increased noise and disturbance can reduce quiet use and displace visitors from ___ (trail/camp/area). Please revise by analyzing sound/noise and activity levels for each alternative in ___ (location), and adopt conditions such as ___ (seasonal timing limits, daylight hour restrictions, haul route limits, no-operations buffers near recreation sites).</p>
<p>“We’re connected to this land in ways that don’t show up on maps. It holds memories and meaning for people in this community.”</p>	<p>Informal sites, legacy trails, local knowledge</p>	<p>On page ___ / Map ___, the EA states ___ about access/trails/recreation features in the project area. In Unit ___ near ___, the EA omits ___ (informal trails, gathering spots, legacy routes, pullouts, dispersed sites). This matters because project activities (road work, equipment, closures) could impact these use areas through ___ (loss of access, safety conflicts, damage, displacement). Please revise by conducting a site visit and incorporating local-use features into the affected environment and impacts analysis, and adopt mitigation such as ___ (protect/flag informal routes, maintain access points, avoid staging on commonly used dispersed sites, include a closures/notifications plan).</p>

<p>“This land is sacred. We should give more of it back to Native peoples.” <i>(keep as “sacred / culturally important” without debating policy goals)</i></p>	<p>Cultural resources, traditional plant areas, Tribal consultation</p>	<p>On page ___ / Section ___, the EA states ___ about cultural resources, surveys, or Tribal consultation for Unit ___ / the project area. In ___ (location/unit), this is incomplete because ___ (e.g., consultation details aren’t described; survey coverage/timing is unclear; traditional plant areas aren’t analyzed). This matters because ground disturbance or vegetation treatments may affect ___ (cultural sites, heritage landscapes, traditional gathering plants). Please revise by documenting Tribal consultation and survey methods/results, analyzing potential effects in Unit ___ / along ___, and adopting protective measures such as ___ (avoidance areas, buffers, no-ground-disturbance zones, monitoring during work, seasonal restrictions around gathering times).</p>
---	---	---

Same care. Now it’s actionable.

Forest Keeper Checklist

Before you submit:

- Did I reference the document?
- Did I name the resource at risk?
- Did I describe a concrete impact?
- Did I recommend a specific fix?
- Did I keep it professional and focused?

Your job isn’t to be loud.

Your job is to be HEARD as a clear Voice for the Voiceless.

Additional Commenting Resources

Non-BLM Commenting Guides

- Gehrke, G. & Paz, A. (2024). *How to Write Effective Public Comments*. Environmental Data & Governance Initiative.
<https://envirodatagov.org/how-to-write-effective-public-comments/> EDGI
- *Public Participation in Environmental Decision-Making: Step-by-Step Tips for Writing Effective Public Comments*. Environmental Law Institute.
<https://www.eli.org/research-report/public-participation-environmental-decision-making-step-by-step-tips-writing-effective> Environmental Law Institute

- *Submitting Public Comments*. Environmental Justice Green Book.
<https://ejgreenbook.com/resources/submitting-public-comments/> The Environmental Justice Green Book -

BLM / NEPA Official Guidance

- BLM. *Public Participation in NEPA Process*.
<https://www.blm.gov/programs/planning-and-nepa/public-participation> US EPA
- CEQ. *A Citizen's Guide to NEPA*.
https://ceq.doe.gov/docs/get-involved/citizens_guide_dec07.pdf CEQ