

Comments and Responses



Objectives

- Develop an efficient approach to organize and respond to comments received on the Draft RMP/EIS.
- Prepare high-quality responses to comments.



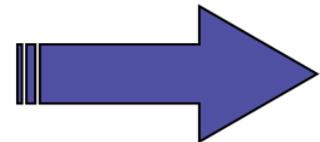
Types of Comments

- Written
- Oral (use caution)
- Electronic (for example, via ePlanning)
- Domestic or foreign
- Form letters
- Petitions



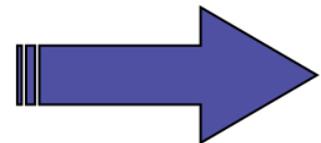
Categorizing and Organizing Comments

- All comments should be either attached to final EIS or summarized (all are part of the administrative record).
- Keep original of every piece of correspondence intact for final publication.
- Look for discreet issues, concerns, and questions in each correspondence.
- Consider comments individually and collectively.



Categorizing and Organizing Comments (Cont.)

- Categorize and organize public comments using CommentWorks in ePlanning
- Considerations:
 - Commentors, their affiliations, and locations
 - Letter and comment number
 - Broad topics
 - Specific location in the draft EIS
 - Which staff member or expert may be needed
 - Substantive policy issues that need discussion among the team



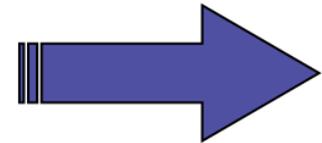
Categorizing and Organizing Comments (Cont.)

- Considerations (cont.):
 - Format, numbering system, and overall organization.
 - Flag key issues as they are received.
 - Treat comments equitably regardless of source.
 - Do not “count votes.”
 - Track and link together redundant comments; be aware of nuances.



Organizing a Response Team

- A designated team member can be a primary sorter.
- If several team members are sorters, decide on uniform approach.
- Get technical comments to experts.
- Get legal comments to legal staff.



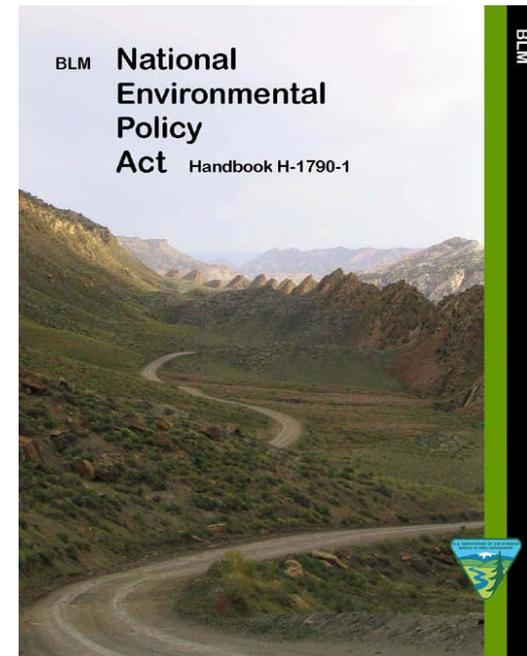
Organizing a Response Team (Cont.)

- Determine who will sort and who will respond.
- Do not need to wait until close of comment period before responding.
- Determine if substantive changes to the plan are needed.
- Maintain consistency in process and professionalism in response.

Requirements for Responses to Comments

■ Respond by...

- Modifying the proposed action,
- Developing and evaluating alternatives not previously given serious consideration by the agency,
- Supplementing, improving, or modifying analysis,
- Making factual corrections, or
- Explaining why comments do not warrant further agency response.



BLM NEPA Handbook Section 6.9; 40 CFR 1502.19; 1503.3, 4; 1506.6

When Do Responses to Comments Trigger the Need for a Supplemental Draft EIS?

- **New significant information**—that materially alters the conclusions of the Draft EIS.
- **New impacts**—that are significant and were not adequately analyzed in the Draft EIS.
- **New alternatives**—that are reasonable and were not within the range of alternatives analyzed in the Draft EIS.
- **New circumstances**—that are significant.