



# Comments with Clout

## Your Comments Are Important

The Clearwater and Nez Perce National Forests are striving to do a good job listening to people's comments and incorporating them into land management decisions.

Individuals who are interested in national forest management provide unique perspectives. Often they convey ideas that agency specialists hadn't considered.

The key to providing these types of comments – “comments with clout” – is to understand how comments will be used.

This paper explains the process and offers suggestions to consider in crafting a response to the forest plan revision proposed action and notice of intent.



## What Is Scoping?

For 90 days following the release of the notice of intent to prepare an environmental impact statement the agency will accept comments during a process called “scoping.”

Throughout this time the Forest Service has an obligation to ensure quality information is available so people can respond to the agency's proposal.

As part of the scoping process participation will be sought from federal, state, county and local agencies and governments; tribal governments; and others who have an interest in management of national forests.

Comments received during this phase of public participation will be used for two purposes:

1. To **identify significant issues** that will be considered in depth during revision (defining the scope), and
2. To **shape alternative management strategies** that will be presented in the draft environmental impact statement when it is issued next fall.

## Goals of Public Participation

The 1982 planning rule outlines goals for public participation during forest plan revision.

According to that guiding document, the intent is to:

- Broaden the information base upon which land and resource management planning decisions are made.
- Ensure that the Forest Service understands the needs, concerns and values of the public.
- Inform the public of Forest Service land and resource planning activities.
- Provide the public with an understanding of Forest Service programs and proposed actions.



## What is a Substantive Comment?

Not all comments are created equal. During the revision process forests are seeking “substantive comments -

A “substantive” comment is consistent with requirements included in the Code of Federal Regulations. It requires commenters to:

- 1) Provide a name, address and (if possible) a phone number.
- 2) Reference the document to which the comment pertains.
- 3) Provide specific facts along with supporting reasons.
- 4) Submit comments by the close of the comment period.

All this information becomes a matter of public record.

## Sample Comments

To help you understand how to “comment with clout,” three sample comments from the previous planning effort follow.

Which would be the most helpful to you if you were the decision maker?

### Comment

*Timber should not be harvested from national forest lands.*

### Effectiveness

This is a general comment that is not consistent with laws and agency policy. It would likely be considered “outside the scope” of the revision proposal.

### Comment

*Initiate safeguards to insure no further degradation of streams, including no timber harvest in streamside areas.*

### Effectiveness

This comment is consistent with laws and policy. It could be strengthened with additional information such as rationale for the suggestion.

### Comment

*Manage the Middle Fork Clearwater drainage from Snowy Summit and Beaver Dam Saddle downstream to near the confluence with Rocky Ridge Creek with a fish/wildlife emphasis prescription instead of a timber emphasis. This will help to protect the wolf and its habitat...and also link fish/wildlife management areas...*

### Effectiveness

This comment is very helpful. It directly relates to direction in a draft environmental impact statement. The desired action, location and rationale are all clearly stated.

## What Happens to My Comment?

During revision the forests will likely receive thousands of comments. To deal with this volume, responses will be documented and analyzed using a process called “content analysis.”

Content analysis is a systematic approach of compiling and categorizing all viewpoints and concerns that are submitted.

When it arrives, each response is assigned a unique number. This number allows analysts to link specific comments to the commenter.

Each response is carefully read several times and coded according to subject. Coded comments are entered verbatim into a comment database.

Database reports track all input and allow analysts to identify public concerns and analyze relationships.

A report is created to organize and summarize all input. Each topic presented is supported with representative quotes.

The resulting report – an organized compilation of thousands of comments – will be used to refine concerns and craft alternative management strategies.

During revision the forests will make a concerted effort to discuss how input shapes documents and decisions.

Thank you in advance for your comments.