

Tips for Commenting on the Old Growth Amendment DEIS

Background

The Forest Service's Old-Growth Amendment amends over 120 land management plans through one analysis and decision. The proposed amendment is intended to provide a consistent management framework to conserve and steward old-growth forests in response to rapidly changing climate conditions and other threats (e.g. wildfire, insect and disease).

All scoping responses were reviewed, coded, and analyzed to develop overarching themes and resource/program/process-specific concerns and recommendations. (See [Appendix A](#) for a more detailed summary of the scoping process.) These themes, concerns, and recommendations were considered and used to inform the agency response. The agency responded by:

- Modifying the proposed action;
- Developing action alternatives;
- Using information to inform/conduct the analysis (including consideration of various literature/references cited);
- Making factual corrections or updating content to read more clearly and be more readily understood;
- Considering but making no change because the concern/recommendation was already accounted for, outside the scope of the amendment, and/or outside the authority of the Department/agency; or
- Developing engagement sessions and other communication tools/opportunities to inform, listen to, and learn from Tribes, partners, stakeholders, and the public.

Tips for Commenting

To provide comments that are most likely to get your concern addressed, please follow the tips provided below. More information about commenting on NEPA projects is available in the [Citizens Guide to NEPA](#).

Substantive comments are the most useful. These are comments that are within the scope of, are specific to, or have a direct relationship to the proposed action or action alternatives and include supporting reasons and recommendations for consideration.

1. Familiarize yourself with the Proposed Action and Action Alternatives:

- In drafting comments, focus on the proposed action's purpose and need, the proposed action alternatives, and the environmental impact assessments for those alternatives.
 - Comments should be clear, concise, and relevant to the analysis of the proposed action.
 - Substantive, solution-oriented comments that provide specific examples are more effective than those that simply support or oppose the proposed project.
- Understand that commenting is not a form of "voting". The number of negative or positive comments an agency receives does not ensure or prevent an action from moving forward.
 - Many comments that repeat the same basic message of support or opposition will typically be considered as a single issue or concern.
- General comments that state an action will have "significant environmental effects" will not help an agency make a better decision unless the relevant causes and environmental effects are explained.

2. Be Specific and Relevant:

- Specific written comments are most useful.
 - Refer to specific sections, pages, etc. of the DEIS
 - Present facts relevant to the analysis of environmental effects
 - Include supporting reasons and recommendations for consideration
 - Avoid non-specific comments that lack detail or rationale.
 - Avoid repeating comments submitted during scoping as these have already been considered in the development of the DEIS.
- 3. Submit Timely Comments:**
- Comments must be postmarked or received electronically within 90 days. The 90 days start the day after publication of the Notice of Availability of the Draft EIS publishing in the Federal Register.

Table 1: Comment Examples

Examples of Substantive Comments	Examples of Non-substantive Comments
I disagree with closing Road 245. I recommend keeping this road open as I need this road to access my private land.	Stop closing our roads!
Grazing should not be allowed along Dry Creek because they are removing all the vegetation and making the stream muddy. I recommend fencing off the creek to prevent grazing or adjusting the grazing permit to change the approved area for grazing.	No grazing should be allowed.

How to Submit Comments

Comments must be submitted using the following methods:

- **Online (preferred)** through the Comment Analysis and Response Application (CARA): Submit comments via webform at <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>.
- **Hardcopy** letters must be submitted to:

Director, Ecosystem Management Coordination
 201 14th Street SW, Mailstop 1108
 Washington, DC 20250–1124

As the CARA webform and hardcopy are the two platforms for accepting comments, **comments submitted outside these methods will not be prioritized for consideration and response**; however, they will be included in the project record.

Organizations Seeking to Submit Bulk Batches of Comments

In response to inquiries from organizations seeking to make bulk submissions of form or form plus letters:

“CARA (Comment and Analysis Response Application) is the platform for accepting electronic comments from individuals, groups and organizations in response to the Old Growth Amendment DEIS.”

Commenting is not a form of voting. The number of supportive or unsupportive comments an agency receives does not ensure or prevent an action from moving forward. Refer back to the *Tips for Commenting* section above for a description of comments that are most useful.