



# HOW TO DRAFT PUBLIC COMMENTS



## WHAT IS A WRITTEN PUBLIC COMMENT?

Every time a federal, state, or local government agency undertakes a significant environmental action, the agency has to put something in writing. These documents, which range from background information to records of decisions, can be complicated to produce, and the resulting conclusion or action can have far-reaching effects on individuals, communities, economies, and ecosystems.

Comment writing is a process that allows individuals, organizations, agencies, and businesses to provide written input on proposed environmental decisions.

Designated public comment periods offer opportunities for the public to comment on a public draft.

## WHY SUBMIT A WRITTEN COMMENT?

As with verbal commenting, written comments are an important way to make your voice heard in decision-making. Public comments can strengthen an environmental decision by providing the authoring agency with facts or perspectives that were lacking in the original draft. The goal of commenting is to help the agency create an accurate and comprehensive document to support appropriate and informed decision-making.

## BEFORE YOU COMMENT

Comment periods are typically short—often just 30 days—so it is a good idea to prepare as much as possible beforehand. Here are a few ideas:

- First, consider whether you know anyone involved in producing the draft to whom you could direct questions. Second, find out generally when the document will be released, so you can plan ahead. Third, consider coordinating your comment with others' comments to strengthen your message.
- Identify, collect, and review background information. Gather background materials to familiarize yourself with the scope of the issue (for example, relevant laws or similar agency documents).
- Create a checklist of important considerations. This will help you keep track of what you hope to see in the document.

## PREPARING TO COMMENT

Consider the following points before you start writing your comment.

- It is important to remember that the person responsible for reviewing your comment may have hundreds, or even thousands, of other comments to read.
- To get your message across, frame your comment in a clear, concise, and convincing manner.
- Define your objectives. Before you start writing, ask yourself: What do you hope to achieve through your comment? Are you trying to stop or delay a particular action, to ensure that the decision or document is in line with your organization's policies, or to catch and correct factual errors or data gaps? You should write your comment in a way that best supports your objectives.
- Use clear organization, formatting, and language. Use subject headings throughout your comment to draw attention to key points. Remember that the authors may be flooded with comments and may have to review each set quickly.

## WRITING YOUR COMMENT

The exact content of your comment will depend on the issues addressed in the document and on your views of them. Here's some tips for writing a convincing comment.

- Make the strongest possible points.
- Suggest specific language when possible and appropriate.
- Use specific examples to illustrate concerns.
- State what you support as well as what you disagree with.
- Provide supplemental information, if needed.
- If possible, offer helpful solutions.

## ORGANIZING YOUR COMMENT

Tips for making your comment clear, concise, and easy to follow:

- If you have more than one major concern, open your comment with a summary section like "Major Concerns" or "General Comments" and outline them before you give detail.
- Use headings and sub-headings to separate your points. Highlight your headings with some combination of spacing, color, capital letters, or bold, italic, or underlined font.
- For specific concerns, order your comments page-by-page to make it easier for the reviewer to locate the places in the document that you are referencing.
- Avoid dense blocks of text.
- Follow good writing practices: use topic sentences, keep each sentence under 50 words, and use the active voice.
- Phrase your comments as statements, not questions, and use respectful language.

## FOLLOWING UP ON YOUR COMMENT

To increase the likelihood that your comment is addressed, you may want to follow up after you've submitted it. Some follow-up options include: speaking at a public meeting or hearing; rallying support for your position among agencies or citizen groups; meeting with an official decision-maker; and going to the press.

**If you have further questions on writing public comments, please contact us @ [info@narn.org](mailto:info@narn.org)**