Preserving Rockhound habitat on federal lands.
Preparing Comment Letters – What's effective, what's not

Detailed letters with many signatories are most impactful

The **Department of Interior (DOI)** and its agencies such as the **Bureau of Land Management (BLM)** do not attach the same weight or gravitas to all comment letters. The sheer volume of many letters is not necessarily as effective as a few detailed comment letter containing specific references to hard data and factual information (versus generalized comments and emotional opining).

A lot of work goes into preparing a detailed comment letter that **DOI** and its agencies will regard as authoritative. So, consider seriously signing onto a detailed letter when the opportunity is presented. You can make your voice heard more persuasively by joining a chorus in a well-crafted authority letter.

A proven model for an effective comment letter

On August 6, 2016, a comment letter was submitted to the San Bernardino County Supervisors which encouraged them to deny a permit for the Soda Mountain Solar Project. It was authored by one scientist, with 70 additional scientists signing on to support the letter. Not 70 letters. One effective, well-written letter signed by many. The permit was denied. Let's learn the useful lessons of others who have been successful.

Mike Hunerlach, geologist, ret., 35 years with **USFS** and **BLM**, and currently Chair of PLAC-Central for the **California Federation of Mineralogical Societies, Inc. (CFMS)**, has advised the federation that one authority letter with many signatories is critically important. Individual form-type letters are counter-productive.

The importance of your signature

Organizations representing its members or a constituency enhances the authority of a letter. Likewise, individuals whose affiliations – past and present – show leadership or service to their societies makes a positive impression. List your affiliations and roles/offices held.

Example. Southern California Paleontological Society (**SCPS)** comment letter on the proposed rule for the **PRPA** ending February 6, 2017 had 61 signers, see:
http://www.sdmg.org/blmdocs/SCPS_PRPA_comment_letter_20170203_final.pdf
or **short URL:** https://goo.gl/Rewue6

Boilerplate/form letters are unhelpful

Form letters are put to the side; they are virtually useless. Anyone who uses a detailed letter as a boilerplate and then submits it separately will dilute the hard work that went into crafting the original. Please don't effectively negate all the hard work. The effectiveness of all the variant form letters will be likewise diluted.

A unique, personal letter is a good thing!

No one should feel discouraged from submitting their own letters. By all means, clubs or individuals who wish to write their own letters should prepare their own separate letter written in their own words. Consider referencing other letters with which you agree. Doing so will reinforce those other letters.

If another letter bolsters the points you want to make in your own letter, you can **incorporate by reference** the other letter – whole or in part – into yours. Using this technique enables you to avoid having to copy/paste/long sections of the other letter that you want to cite.

Example. SDMG comment letter to **BLM** for the **DRECP** Review ending March 22, 2018 uses **incorporation by reference** to make its earlier 48-page letter submitted in 2015 on the **Draft DRECP** part of the new letter, see:
http://www.sdmg.org/blmdocs/SDMG_draft_letter_oppose_amending_DRECP_201803.pdf
or **short URL:** https://goo.gl/kNbkiM

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If you know an organization that is contemplating writing a comment letter on the same topic as your society or others you know, reach out and join together on one letter. Let **SDMG** know, maybe we can help, contact us at: **editor@sdmg.org**

You can sign up for **SDMG's** mailing list and select only the topics that interest you – there are several lists related to public lands. That way, we can reach out to you with newsworthy information in a timely manner. SEE: **https://goo.gl/KZqPsc**