

From: [Doug Pollock](#)
To: [Holman, Michele - FS, OR](#)
Cc: [Fisher, Lawrence - FS, OR](#)
Subject: [External Email]Comment Deadline for "North Fork Smith River Restoration Project (NF Smith Project)"?
Date: Thursday, September 5, 2024 11:20:30 AM
Attachments: [image.png](#)

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Dear District Ranger Holman,

This morning, I sat down at my computer to set aside time to comment on the "NF Smith River Restoration Project". I started with your letter (File Code 1950, dated August 9, 2024), which was addressed to, "Dear Interested Neighbor, Partner, or Patron:". I presume this was your first major public communication notifying people of the comment opportunity for this project.

Unfortunately, the one piece of information I was looking for (the specific comment deadline) was missing. Instead, there's a lengthy description that seems to try to justify the lack of a specific deadline:

"The combined scoping and 30-day comment period is scheduled to begin when the legal notice of the opportunity to comment is published in the Eugene Register-Guard. The legal notice is expected to be published on Friday, August 9th, 2024. However, in the event the legal ad is published on a different date, that actual publishing date will constitute the legal start of the combined scoping and 30-day comment period."

I guess one is to infer that the lack of a specific deadline has to do with your legal obligations for public notification and your inability to predict exactly when the Register-Guard will publish the notice.

I next went to the project webpage (<https://www.fs.usda.gov/project/siuslaw/?project=59122>) and found the following chart:

Milestone	Date
Scoping Start	08/12/2024
Comment Period	08/12/2024
Objection Period Start	04/01/2025 (Estimated)
Decision	03/01/2025 (Estimated)
Implementation	04/01/2025 (Estimated)

"Comment Period 08/12/2024" strikes me as ambiguous and decidedly unhelpful. There is no indication whether that is the start of the comment period, or the end. Since the creator of this chart chose to include "Start" with two other entries ("Scoping Start" and "Objection Period Start"), it seems inconsistent and odd that "Start" was omitted from the "Comment Period". Is this due to the ambiguity of the publishing date, or simply an oversight? The note in your original letter about a "30-day comment period" coupled with the above chart would lead one to conclude (incorrectly) that the deadline is September 12th, 2024.

It was only after I visited the specific webpage for public comments (<https://cara.fs2c.usda.gov/Public/CommentInput?Project=59122>) that I discovered the actual comment deadline listed in a single, nondescript sentence in the middle of the page:

"Your comments are requested through 9/10/2024 11:59:59 PM (Pacific Standard Time)."

All of this complexity strikes me as fundamentally contrary to the public interest. The comment deadline is arguably the single most important piece of information for the general public. You ought to do everything in your power to communicate it clearly right from the start. Why not avoid the publishing ambiguity by allocating more than the minimum comment period (say 35 days) rather than the absolute minimum? That way, you could set a defined deadline right from the start.

Once the deadline is determined, you ought to communicate it in **BIG, BOLD TYPE** at the top of all of the project webpages (not just the public input one):

"THE COMMENT DEADLINE FOR THIS PROJECT IS SEPTEMBER 10TH, 2024 AT AT 11:59:59 PM (Pacific Standard Time)"

I would also like to understand why you don't provide an email address for public comments (like our state agencies routinely do). I would much prefer composing my comments in an email (and attaching a PDF file, if needed), rather than using your clunky webform.

These forms with text boxes are inherently problematic. Yours, for example, does not indicate the character limit and does not allow even basic text formatting (like bold, underline, italics, indents, etc.). Time and time again, I've used forms like this only to have my message

inexplicably disappear (often after spending a considerable amount of time composing it). While your form allows one to submit attachments, it indicates this is only for image files (stating, "Use Attachments to upload images.") This leaves one wondering whether it can also be used to submit text-based documents (in lieu of the "text box"). You really need to clarify this.

I also found the statement about "PII" confusing:

"Do not enter any personally identifiable information (PII) such as address or email in the text editor below. Your name and all information entered into the text box below may be published on this website."

Since one has already entered personal information above, one is left wondering what's the difference. Are peoples' names publicly accessible? If so, that's "personally identifiable information", so where do you draw the line?

These inconsistencies and the lack of clear information all serve to disenfranchise citizens like myself who wish to submit comments. I hope you and your staff will dedicate some time and attention to fixing these problems.

Sincerely,

Doug Pollock

P.S. You should really include your email address on all of your communications so that citizens can contact you directly to express their opinions and submit suggestions. I have intended to email you a number of times, but was unable to find your email address until quite recently.