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Organization: Cascade Forest Conservancy

Title:

Comments: Rebecca Hoffman

Monument Ranger

1501 E. Evergreen Blvd.

Vancouver, WA 98661

(360) 891-5000

December 20, 2019

Re: Request for Extension of 30-day Comment Period for Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project Notice of Proposed Action

Dear Ms. Hoffman,

On behalf of the thousands of Washington members and supporters whom our organization represents, we are writing to request a 15-day extension of the deadline for public comments on the Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project Notice of Proposed Action (NOPA).

Legal notice for the NOPA was published in The Columbian on December 17, 2019, initiating a 30-day comment period set to close on January 16, 2019. Given the Forest Service's intention to forgo a public comment period following publication of the Environmental Assessment[mdash]ample commenting time is paramount to this initial process.

Pursuant to the National Environmental Policy Act (NEPA) regulations promulgated by the Council on Environmental Quality (CEQ), the Forest Service has the authority to set time limits that are appropriate to individual actions. See 40 C.F.R. 501.8. In doing so, agencies may consider, among other things, the degree to which relevant information is known, and if not known, the time required for obtaining it and the degree to which the action is controversial. See 40 C.F.R.501.8.(b)(vi), (vii).

This particular proposal is uniquely controversial and requires extensive deliberation and input to respond to the NOPA. First, the lands in question are of the most unique research areas in the entire world. The Monument was created with research as a priority and that research area becomes more valuable every year that passes. The proposed project, would cause permanent and irreversible changes to this area.

Second, the environmental impacts of this project have not been considered or adequately documented. The road construction, drilling rig transportation, and drilling equipment will have wide-ranging environmental impacts on the landscape.

Third, the Legal Notice references 36 C.F.R 218.6 for the reason that the regulations prohibit an extension of the comment period[mdash]this regulation relates to objections to Environmental Assessment documents, and not Notice of Proposed Actions, or Scoping comments. See 36 C.F.R 218.6(a), (d).

Finally, the timing of the current comment period does not allow for adequate public participation. The 30-day comment period falls at the end of the calendar year and over the holiday vacation period--both agency officials

and stakeholders will struggle to give this unique and controversial issue the time and attention necessary for a decision of this magnitude.

For the above reasons, we request the Forest Service extends the comment period on this rule to a full 45 days from the release of the Notice of Proposed Action. Not only would this provide interested organizations and stakeholders more time to generate comprehensive comments, but it would also provide the Forest Service with substantial and thorough input from the public.

Thank you for your full consideration of this request. We look forward to hearing from you as soon as possible.
Respectfully,

Lucy Brookham
Policy Manager
Cascade Forest Conservancy