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First name: Susan

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Organization:

Title:

Comments: Sent: Thursday, December 19, 2019 5:35 PM

Subject: Request for Comment Period Extension

Rebecca,

I am requesting an extension of the 30-day comment period for the "Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Report: Notice of Proposed Action for Scoping and Comment Period."

The timing of the document release and publication of the legal notice just before the start of the Christmas and New Years holidays seem intended to stifle public engagement. Most of the researchers who will be impacted by the proposed action are academics just heading out on a school year break and they may not have much chance to review the document until they return to their offices at the start of the new school term or semester. As I have dug into the document, I see that the proposed action will have far more significant impacts on the public recreation than the past proposal and I believe that there are hikers who will be interested in commenting on a proposal that would affect trail access for up to 5 field seasons. It will be a challenge for people to become aware of or pay attention to this proposal when they are focused on holiday celebrations.

As for myself, the proposed action document references supporting materials that are not readily available to the public. For example, on page 6 the document references a map of the corridor area located in the project file. It will be difficult for me to arrange an appointment to visit your office to access these supporting materials until some time in January. The Washington Native Plant Society's conservation committee, of which I am a member, is not scheduled to meet until January 14, 2020, leaving only a day to submit comments under the current schedule.

Furthermore, the regulations cited in the document at 36 CFR 218.6(d) prohibiting extension of the comment period pertain to filing objections, not to scoping. 36 CFR 218 addresses the Project-Level Predecisional Administrative Review Process, defined at 36 CFR.1 as "objection." It says in both the title and the body of your document that is is a scoping period, not an objection period. 40 CFR 1501.7 addresses scoping and says that there is not a prescribed universal time limit but rather that the action agency has flexibility in setting time periods.

Therefore, I request an extra 15 days be added to the current 30-day comment period to better facilitate public engagement in your decision process.

Sincerely,

Susan Saul