Data Submitted (UTC 11): 10/28/2020 8:00:00 AM

First name: Mark Last name: Squillace

Organization: University of Colorado Law School

Title: Raphael J Moses Professor of Natural Resource Law

Comments: I recently became aware of the proposed South Revilla Integrated Resource Project on the Tongass National Forest in Alaska because of the announcement that the DEIS had been released and was available for public comment until October 19th. I teach a course on environmental decisionmaking at the University of Colorado Law School and all of my students are required to write a public comment on a pending government proposal. This seems like a good candidate except that the comment deadline seems totally unrealistic. If you are serious about engaging the public on this project in a meaningful way then I ask that you offer a 90 day comment period, which would extend the comment period through December 3, 2020. With the Appendices, the DEIS comes in at more than 300 pages with nearly 1000 additional pages in the Appendices. While the Appendices consist of many maps, these can take much time to decipher and understand. You cannot reasonably expect the public - other than perhaps professional commenters -- to be in a position to offer meaningful comments in such a short period of time

Given the controversy surrounding logging in the Tongass a major project like this seems likely to be challenged in court if it is approved. Given that, it would seem prudent for the Forest Service to ensure that the public has been afforded a fair opportunity to engage on the issues that this project raises. A 45-day comment period on a substantial document like this seems more designed to stifle engagement. Moreover, it is hard to see why the Forest Service would want to rush this project through at a time when the presidential election could very upend this project. It seems highly unlikely that the Forest Service could prepare a final EIS and issues a record of decision before January 20th and if we see a change of administrations next year then it seems that the chances for this project to proceed will likely decline considerably.

Why not take your time and try to get this right rather than trying to rush it through. Why not go the extra mile to engage the public in a meaningful way rather than rushing toward a decision that seems likely to have already been made. To that end, I ask that you please extend the comment period to December 3, 2020.