

***Friends or the Clearwater
Alliance for the Wild Rockies
Conservation Congress
Flathead-Lolo-Bitterroot Citizens Task Force
Friends of the Bitterroot
Friends of the Wild Swan
Kootenai Environmental Alliance
Mike Bader Independent Consultant
Nimiipuu Protecting the Environment
Swan View Coalition
The Wilderness Society
Center for Biological Diversity
WildEarth Guardians
Wilderness Watch
WildWest Institute***

December 23, 2019

Cheryl Probert
Forest Supervisor
Nez Perce – Clearwater National Forests
903 3rd
Kamiah, ID 83536

Sent Via Email

Dear Supervisor Probert:

The undersigned individuals and organizations request an additional 90 days beyond the date the agency has set to review the Draft Environmental Impact Statement (DEIS) for the revision of the Nez Perce – Clearwater National Forests' Forest Plan revision. Reasons for the request are listed below.

The DEIS was released during this holiday season and appeared in the federal register on December 20, 2019. People are spending time with their families, including Forest Service employees. Those who may want to contact Forest Service officials with questions about this proposal in the first two weeks of the current period would likely have difficulty because many employees take annual leave this time of year and in the early part of next year. Furthermore, two other documents have been released recently as well, Hungry Ridge and Gold Hill, and the comment period for those will run into January. The public will be reviewing both of those documents.

It has taken a long time for the Forest Service to produce this draft plan. Indeed, the notice for revision of the Clearwater National Forest Plan was published in 1994. The public, who owns the national forests, should be allowed adequate time to review the plan. It won't hurt the timeline for revision to allow the public adequate opportunities to review the voluminous materials, including updated portions of the Assessment. Besides, shortchanging the public involvement process, while taking considerably

more time than promised in preparing the draft environmental impact statement and plan, sends the wrong signal to the public about agency credibility.

The recent administrative combination of the two national forests makes it more difficult to review the proposed plan and DEIS as it needs to be compared to two separate extant plans, rather than just one. This, in essence, doubles the amount of time needed to be spent on analyzing the changes from the current forest plans to a single new plan.

For forest plan revisions, the planning regulations (36 CFR § 219.16(2)) require a comment period of “at least 90 days.” Furthermore, the Forest Service Handbook allows for extension of time to file comments on environmental impact statements. Given the circumstances, such an extension “is appropriate” in this instance (see FSH 1909.15 Chapter 20, 24.3).

Given the timing of the comment period, and the voluminous material that will be required to review two plans being combined into one plan for two national forests, totaling about 4 million acres, we think this warrants an extension on the comment period to meet the letter and spirit of public involvement as required by the National Environmental Policy Act, the Forest Service planning regulations, and Forest Service direction.

We await your prompt reply regarding our 90-day extension request. Thank you very much for your consideration in this matter.

Sincerely,

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