

March 25, 2020

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
14th and Independence, NW
Washington, DC 20240

The Honorable Vicky Christiansen
Chief
U.S. Forest Service
14th and Independence, NW
Washington, DC 20240

Re: Additional Time for Public Participation During the COVID-19 National Emergency

Dear Secretary Perdue and Chief Christiansen:

On behalf of our millions of members nationwide, we are requesting national direction from you to provide additional time for the public to participate in national forest land management planning processes during the current public health crisis caused by COVID-19 (Coronavirus).

As you know, President Trump issued an executive order declaring a state of national emergency on March 13, 2020, in response to the COVID-19 outbreak in the United States. Since then, numerous U.S. governmental organizations, including the U.S. Supreme Court and the Internal Revenue Service, have announced extensions of normal filing deadlines because of ongoing public health concerns relating to COVID-19.

However, to our knowledge, the U.S. Forest Service so far has not issued national guidance regarding extensions of time for public involvement opportunities on proposed national forest management plans and projects. The “Coronavirus Frequently Asked Questions” document on the Forest Service website (as of March 23) indicates that various management activities such as monitoring and grazing allotment inspections may be delayed, but it does not address the question of extending public comment deadlines or taking other steps to accommodate the public’s need for additional time to participate in normal planning processes.

We are aware that some individual national forests are extending or deferring comment or objection periods, while others are not. For example, on March 18 the Nantahala Pisgah National Forest announced that it is extending the public comment period on its draft forest plan, explaining that “[w]e recognize that there is a need to extend the comment period to accommodate meaningful public involvement.” Similarly, on March 20, the supervisor of the Daniel Boone National Forest cancelled the objection process for the South Red Bird Wildlife Habitat Enhancement Project, stating, “The public and our interested parties are currently overwhelmed with life-changing circumstances as public health officials seek to address the Coronavirus (COVID-19). This event is affecting our interested stakeholders as well as our Forest Service staff as we seek to continue delivery of public services.” On the other

hand, the Gila National Forest has not yet extended the comment period on its draft forest plan, even though the governor of New Mexico declared a public health emergency on March 11.

Many of our members who are involved in Forest Service planning processes are indeed feeling overwhelmed by the COVID-19 crisis and are unable to devote the time and attention to participate meaningfully. People are focused on keeping their families healthy and safe, while complying with the extraordinary measures that are being implemented to contain and limit the spread of the disease. COVID-19 has disrupted normal working, schooling, and living conditions, impairing the ability of many parents, issue experts, and members of the general public to go about their daily routines and conduct regular business, much less weigh in on Forest Service actions that affect them. Numerous agency and stakeholder meetings to educate the public about forest plans and help them submit informed comment have been cancelled. Moreover, increasing numbers of Forest Service offices are closing to the general public, making it more difficult for some people to review and comment on planning documents.

Consistent with the USDA Forest Service's mission to care for our national forests *and serve people*, we seek your understanding during this trying time and request that you issue appropriate direction to extend public comment opportunities during the COVID-19 crisis. Such action would be consistent with the President's emergency declaration, improve public engagement, and build good will with many stakeholders.

Thank you for your consideration.

Sincerely,

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