

E-mail comment received 10/25/06

Dear Horst.

Thank you and your boss for taking on this very important task to update NEPA and its CFRs.

With regard to categorical exclusions. I was a logger in a previous career.

There have been tens of thousand of timber sales on federal land going back to the 1940s. Most are pretty standard. Since the early 1990s, and prior to the Clinton Forest Plan set them aside, we had National Forest Management Plans, and BLM Resource Management Plans, each had an EIS.

I recommend that federal timber sales within a broader National Forest Management Plan or a BLM RMP be considered a categorical exclusion.

I also recommend that salvage logging following large scale blow down, fire or insect or forest disease kill be considered for categorical exclusion.

The effect of both recommendations goes to the affecting the human environment clause in NEPA.

I also recommend that CEQ take a judicious look at redefining "major federal action."

Issuing a permit, or in most cases and easement, is not a major federal action. It's simply doing the ordinary business of land management.

Redefining federal actions would greatly enhance the effects of NEPA by saving the federal government and private sector from spending national and private capital and money on truly pointless analysis of ordinary business/ministerial activities. They're not "actions" in any conventional sense, but merely activities persuent to managing the public trust in an efficient manner.

Again, thank you for your work.

Best wishes;

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