

TO: NEPA Modernization (CE)

FROM: Dan Dessecker  
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DATE: 23 October 2006

RE: The National Environmental Policy Act – Guidance on Categorical Exclusions; 19 September 2006 Federal Register Notice

The Ruffed Grouse Society appreciates the opportunity to comment on the proposal by the Council on Environmental Quality (CEQ) to provide guidance to federal agencies regarding “Establishing, Revising, and Using Categorical Exclusions under the National Environmental Policy Act.”

The thoughtful use of categorical exclusions can be a useful tool in expediting the implementation of routine conservation activities in a cost-effective manner. A Government Accounting Office report demonstrates that the US Forest Service alone spends over \$250 million each year preparing 20,000 environmental documents. The targeted use of categorical exclusions could reduce this type of workload, thereby saving both time and money.

The Society supports the guidance as proposed in the 19 September 2006 Federal Register Notice. In addition, the Society urges CEQ to incorporate the following considerations into final guidance.

1. Federal agencies should investigate opportunities to establish categorical exclusions applicable to geographic scales beyond the site level. Similar actions implemented in similar ecosystems within the same region or ecological landscape may yield similar effects on the environment. Federal agencies could improve both the precision of estimates of environmental effects and streamline decision-making processes by broadening the geographic scope of consideration in the development of categorical exclusions.
2. Federal agencies should exercise caution to ensure that policy direction incorporated into categorical exclusions relevant to federal lands does not affect activities on non-federal lands funded through state programs, including the use of Pittman-Robertson funds. State authority to manage wildlife resources on non-federal lands should supersede federal policy if proposed management activities are consistent with the purpose for which the land was originally acquired.

If you have any questions, please don't hesitate to contact me. Thank you for your time.