



December 1, 2006

Horst Greczmiel
Associate Director for NEPA Oversight
Council on Environmental Quality
722 Jackson Place, N.W.
Washington, D.C. 20503

Dear Mr. Greczmiel:

The Society of American Foresters (SAF), representing over 15,000 forest managers, researchers, teachers, and consultants, is pleased to offer comments on the Council on Environmental Quality's (CEQ) *Proposed Guidance for Establishing, Revising, and Using Categorical Exclusions (CEs) under the National Environmental Policy Act (NEPA)*. The proposed guidance will serve to encourage federal agencies to better utilize categorical exclusion authorities, ultimately resulting in more efficient use of federal resources and knowledge. We believe the proposed guidance sufficiently addresses issues raised in the CEQ's NEPA Task Force Report and we are pleased to see many of the recommendations acted upon.

SAF strongly supports the use of CEs for actions that are found to not have a significant impact on the environment. CE's can help federal agencies reduce the amount of time and resources spent on paperwork and documentation and direct more resources to getting work done on-the-ground. The federal agencies have now had over 30 years of experience with NEPA and conducting environmental analysis. Categorical exclusions allow the agencies to build on their experiences and practical knowledge and apply NEPA in a more efficient manner.

We offer the following forestry comments on specific aspects of the proposed guidance.

Impact Demonstration Projects

We are pleased to see reference to "impact demonstration projects" as a means to determine whether a category of agency actions could be categorically excluded from NEPA. We hope the agencies take full advantage of these projects and encourage CEQ to work with the agencies to continuously identify potential impact demonstration projects.

Benchmarking

We strongly support the proposed guidance for "benchmarking." This concept of using information and records from other public and private entities who take similar actions, to document categorical exclusions, will be extremely beneficial. Many government entities and private sector organizations conduct similar activities and have information that will help demonstrate the environmental impacts of projects.

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Refining Proposed Categorical Exclusions

This section's suggestion of possibly limiting some categorical exclusions to certain geographic areas could be extremely helpful, especially for forest-related projects. It is difficult to determine the environmental impacts of a category of action across different forest types, climates, and conditions, thus it doesn't always make sense to issue a national categorical exclusion. This limitation may curb the use of the categorical exclusion tool under NEPA, since agencies tend to issue categorical exclusions at the national scale. It might be more appropriate to issue regional categorical exclusions, with specific references local site conditions, based on scientific and local knowledge. We encourage CEQ to work with the agencies to further develop the idea of regional or local categorical exclusions.

Public Involvement

Public outreach in the development and revision of categorical exclusions can be very useful to get new ideas and issues to the table but to also build public understanding of the use of categorical exclusions. This recommendation is laudable although it will be dictated by time as well as available funding, and the CEQ and relevant agency should be aware and accommodate these limitations.

Periodic Review of Categorical Exclusions

This recommendation will help improve and potentially increase the use of categorical exclusions where appropriate. We hope CEQ will follow up with individual agencies to ensure they are completing this review. This section could be amended to set up such a process.

Again, we strongly support the use of categorical exclusions, where appropriate, and appreciate CEQ's efforts to help foster their use with this guidance.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Marvin D. Brown". The signature is written in a cursive, flowing style.

Marvin D. Brown
President