

September 6, 2002

NEPA Task Force

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Salt Lake City, UT 84122

Dear Sirs:

I am writing to comment on the July 9, 2002 **Federal Register** notice soliciting comments regarding the National Environmental Policy Act (NEPA) process..

I feel a 90 to 120 day comment period should be given. Many rural people are not informed for weeks and have to travel miles into town to get information and respond. The document was completed over a period of years it is unrealistic to expect an adequate response in a number of days. There needs to be more accountability, and a way for documents to be certified as accurate. Currently, information included in the document is often incorrect, and there is no way for a reader to verify information or get it corrected. The person responsible for the action should have to certify that all the information included in the document is accurate and true. NEPA should require that the publication of any action, whether EA or EIS, in the **Federal Register** include a full description of the proposed action and the title within the **Federal Register** should also clearly identify the action. Also, all documents need to be available on the internet in html or text. It would be helpful if an email address was provided, both in the Federal Register notice and the EA or EIS, for a contact person who can answer questions, provide additional information and receive comments.

Proper use of the "no action alternative" is another issue that needs to be addressed in all NEPA documents, including EAs and EISs. No action means no change, or current management, as making a change to the permitted action would be taking an action. Often, in grazing renewal EAs for example, agencies use the no action alternative to mean no grazing, or not renewing the permit. This is not only misleading to the public trying to analyze the document, but it does not meet either the intent or the letter of the law.

Agency personnel at public meetings need to interact with meeting participants, answer questions, or provide information, rather than the current format where they will not respond to questions and just listen to what is said. It is a waste of time for people to travel to these meetings if the agency representatives are not prepared or authorized to answer questions.

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In response to specific questions asked in the **Federal Register** notice:

Section A. Technology, Information Management, and Information Security

My husband and I rely on the mail for notification on pending actions, as well as notice from other people active in the agricultural and natural resource issues. The agencies notification processes are neither adequate nor uniform, and it is virtually impossible to find out about all of the actions that could have an impact. The NEPA process should require notification of the people in the immediate area of any proposal in a variety of ways to make sure that the public is fully aware of proposals and has the opportunity to comment. Agencies should be required to send notification letters to organizations and elected officials in the area and publish notice in all area newspapers. The public needs to have as much information as possible, to ensure that they fully understand

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the size, scope and intended results of a proposal. However, information that could potentially endanger a project or personnel should not be released.

B. Federal and Inter-Governmental Collaboration

The most important characteristic of this type of cooperation is open communication. Agencies must be required to cooperate with all groups, especially those representing area residents and those who will be impacted by the proposal.

C. Programmatic Analysis and Tiering

Many times in addressing Endangered Species a whole landscape is recommended to be managed for a single species. This is most often harmful to the landscape and the other inhabitant plants and animals.

D. Adaptive Management/Monitoring and Evaluation Plans

Nature is not rigid so the use of adaptive management would be very useful to the public and agencies alike, and would greatly benefit the natural resources involved. Whenever possible, the process must be kept open and the public notified of changes that take place. NEPA also requires that impacts to affected publics, especially socioeconomic impacts, be considered. Before any changes to management plans take place, the potential impacts to businesses, economies and individuals need to be considered.

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E. Categorical Exclusions

The concept of categorical exclusions is a good one, allowing the agencies to decide which issues pertain to a particular issue or proposal, and not requiring them to consider issues that are not relevant. However, in our experience with federal land management agencies, often an the agency will decide an issue does not merit consideration and not include it in and EA, when in fact it is a very important issue. Both social and economic impacts to the nearby communities are vitally important and need always to be addressed. Agencies must be required to consider these concerns to adequately fulfill NEPA requirements.

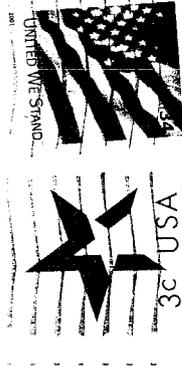
Thank you in advance for your consideration.

Sincerely,

Patricia King *John King*

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