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To: <ceq_nepa@fs.fed.us>
cc:
Subject: Fw: Comments for NEPA Task Force

CQ379

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Sorry for previous false send.

My name is Carla Harper, Montezuma County Federal Lands Program, 109 West Main Room 302 Cortez CO 81321. I am involved with a number of local and regional forestry partnership efforts. Please accept the following comments regarding NEPA.

- Comments and appeals should be obviously directed to the project under analysis. If no direct link to site specific issues can be shown, the Agency should be able to dismiss the comment or appeal without detailed discussion. Some foresters get comment letters that are so general they could describe any sale in the US. Also, issues like global warming, the economics of the national timber program, and population trends of neotropical birds that are not on a T & E list are not relevant to a specific project.

- Small scale (less than 25-50 MBF) commercial timber projects should be approved for categorical exclusion analysis unless extraordinary circumstances are involved. Full environmental analysis on these projects makes these projects prohibitive to even do.

- Projects of similar type should be able to be tiered to previous EAs with only site specific substantive differences needing supplemental new analysis.

- It is inappropriate for one person to be able to stop a project. It should be more of a majority rules. The burden of proof should be shifted in that the individual or group should have to show relevance for their claim.

-Rules for a Finding of No Significance need to be softened. Arguments over research prevail. The agency can't prove

anything ecologically beyond a shadow of a doubt. They can only do things based on what they know at the time.

-Too often judges who know little to nothing about natural resource management are managing our forests.