



3759 Highway 6 P.O. Box 49 Princeton, ID 83857-0049

Phone: (208) 875-1121

Fax: (208) 875-0191



FAX: NEPA Task Force 801-517-1021

September 17, 2002

Submission of Comments to Council on Environmental Quality-NEPA Task Force

I commend the efforts of the Council on Environmental Quality (CEQ) to modernize the NEPA process. It is my hope that the CEQ NEPA Task Force finds ways to streamline the NEPA process and avoid the "analysis paralysis" that prevents federal agencies from responding promptly to pressing needs. As president of forest products company that has a long history of conducting business with the Forest Service, I can assure you that such changes are desperately needed and that, without significant change, it is unlikely we will be able to continue our business relationship much longer.

It is my understanding that approximately 100 Draft or Final Environmental Impact Statements (EISs), 5,200 Environmental Assessments (EAs), and 9,800 Categorical Exclusions (CEs) are produced annually by the Forest Service to comply with the NEPA process. There is an incredibly high cost associated with this effort, both in terms of wasted federal manpower and in the losses associated with extremely long process delays. Changes need to be made to significantly reduce the amount of EISs, EAs and CEs and/or significantly reduce the amount effort needed to create them.

**Recommendations:**

To reduce the amount of Environmental Impact Statements, categorize forestland into a few, large management types, write a generic EIS for several possible management activities on each management type, and refer to these existing EISs for all future activities. Writing specific EISs for every activity on every piece of ground is sheer folly.

Environmental Assessments should be either eliminated or restricted to activities where there is a significant threat to threatened and endangered species and sensitive plants and animals. Risk to these species from management activities should be assigned by generic management categories over broad geographic areas. Writing assessments for specific management activities over small geographic areas should be eliminated.

CQ400

Clear guidelines need to be developed as to which conditions trigger Categorical Exclusions as well as a set of pre-approved treatments to employ once these conditions are met. Dead and dying timber resulting from large fires, insect and disease outbreaks needs to be savaged promptly while there is still enough value to cover the cost of the treatment.

And, lastly, significantly reduce or eliminate NEPA lawsuits, they are an incredible waste of taxpayer dollars. Develop CEQ regulations that are simple and specific in order to reduce opportunities for litigation.

I wish you success in your efforts to streamline the NEPA process.

Sincerely,



Frank R. Bennett  
President