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September 15, 2002

NEPA Task Force
P.O. Box 221150
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CQ412

Greetings:

I would like to add my opinion to this discussion. I spent over 22 years as a Forest Service employee (landscape architect, district and forest staff for renewable resources, district ranger and forest supervisor of two forests). I've worked extensively with NEPA and I must say I'm hard-pressed to understand the need for massive change.

I believe there is a disproportionate reaction to appeals and slow NEPA processes. Statistics show that the majority of NEPA documents sail through and the projects are implemented (assuming the money's still there). The small percentage of projects that are time-sensitive and slowed by appeal are the ones that need to be focused on. Minor modifications of the appeals process would resolve most of the issues, such as requiring a short agency response time and/or outside scientific review.

The reason NEPA is so slow is that federal land management employees are so overworked. Forests take on an inordinate amount of work, reduce staff regularly, have one person doing the job three people used to do and change priorities every time the political winds blow. Congressional directives that require extensive data collection and input (like the Wildlife "Gordzilla" report, the recording and mapping of every fence, culvert and piece of equipment over $500.00, etc.) are more to blame. The process is not the problem!

NEPA works when done its done right. It is a valuable tool for ensuring public trust and credibility of the agency. It helps employees operate interdisciplinarily. It protects the environment from damage. It helps determine the best investment and mitigation.

The history of problems with NEPA in the Forest Service stems from two decades of ignoring public input, rarely considering the no-action alternative as a viable choice and allowing strong personal wills to dominate the process. Finally in the 1990's we saw true efforts to collaborate, listen to the public and make balanced decisions. And now we are surprised that the public still doesn't feel all that trusting. It's not the system that's broken. It's the lack of trust and credibility.

Efforts to cut the public, and even local decision-makers, out of the process by this administration is visible at every turn. The House Energy Bill is just one example. Altering the ability of the public to participate meaningfully in land management decisions, moving decision-making to the political appointees and relaxing the scientific rigor of NEPA is not the way to solve problems on public lands. As a matter of fact, it's just the recipe to increase divisiveness and mistrust.

Sincerely,

Gloria E. Flora, Executive Director

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