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To: <ceq_nepa@fs.fed.us>
cc:
Subject: NEPA TASK FORCE

CQ550

James L. Connaughton
Chairman, Council on Environmental Quality
722 Jackson Place, N.W.
Washington, D.C. 20503
23 September 2002

Re: Comments to NEPA Task Force

Dear Mr. Connaughton:

In response to the Federal Register notice, I am writing to urge that the CEQ NEPA Task Force take a different tack from that laid out as your plan of action, and borrow from NEPA itself for your own process, if you expect the public to accept this as a good faith effort. The proposal to exclude the EEZ from NEPA is a case in point -- trying to force the facts to support a politically predetermined course only discredits the Task Force and certainly does not build toward a reasonable consensus.

The NEPA process provides for gathering information from a wide range of sources and with a comprehensive perspective, analyzing this information dispassionately to provide a basis for making informed choices and tradeoffs, and engaging the public at large in these important societal decisions through active recruitment and transparency. Unfortunately, the NEPA Task Force appears to be constrained by preconditions and a specific agenda to find ways to skip the necessary steps in all this, skewing the results from the start. This approach has indeed often weakened the NEPA process itself -- you should be seeking ways to correct that, not emulate it.

My suggestions for "modernizing" NEPA would include:

- a) subjecting Environmental Assessments as well as environmental Impact Statements to greater, not less, public scrutiny, fully utilizing the the press, the Internet, and all other technological means as they become available;
- b) reviewing the actual track record of individual Environmental Impact Statements to determine what worked best and what did not in assessing risks and predicting impacts (then applying these lessons); and
- c) requiring decisionmakers actually to read and address the documentation that supports the recommended alternatives.

To put it succinctly, don't mess with NEPA at all if your purpose is to dismantle it, not modernize and reinforce it. NEPA has stood the test of time.

Sincerely,

Vivian Newman
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Sierra Club
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