



wildidaho.org

Idaho Conservation League

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CQ570

NEPA Task Force
PO Box 221150
Salt Lake City, UT
84122

September 23, 2002

Idaho Conservation League comments on the National Environmental Protection Act implementation practices

Dear NEPA Task Force,

Thank you for allowing us to write comments regarding the National Environmental Policy Act (NEPA). As Idaho's largest statewide conservation organization, we represent members from around the state, many of whom have a deep personal interest in protecting Idaho's land, water and wildlife. The Idaho Conservation League has a long history of involvement with NEPA regarding land management decisions in Idaho.

The Idaho Conservation League fully supports the continued implementation of NEPA. The NEPA process gives our 3,000 members the chance to engage constructively in decisions affecting our public lands. This opportunity is crucial in Idaho where sixty-three percent of the state is federal land. Our members often participate throughout the entire process, from the scoping phase and formation of alternatives to reviewing the analyses and monitoring resulting activities.

In our regular interactions with land management agencies, we find that NEPA gives us a common framework and creates an atmosphere for meaningful discussion. In cases where we disagree with proposed actions, we have been able to insert new alternatives or remove problematic treatments. The administrative appeals process has been a crucial phase when a decision violates preexisting laws. We have found that many of our concerns were addressed without litigation. In cases in which we did decide to litigate, NEPA gave us procedural guidelines to review to ensure that the proposed actions would safeguard the environment.

We support the use of programmatic and tiered analyses where appropriate, as well as adaptive management and evaluation. We find that categorical exclusions are normally acceptable but believe that future activities must be subjected to stringent public review before they can be included in this heading.

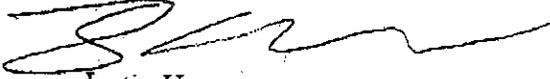
Environmental assessments have proved to be a useful step, although they must also take into account activities on adjacent lands that may have a cumulative effect with the

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proposed action. In addition, supporting documents such as maps and figures are often lacking.

Please feel free to contact me if you have any questions about these comments. We would also like to be on the mailing list for future documents associated with this proposal. We look forward to working with you on this important issue.

Sincerely,



Justin Hayes
Idaho Conservation League