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August 19, 2002

CQ63

NEPA Task Force  
 P.O. Box 221150  
 Salt Lake City, UT 84122

To Whom It May Concern:

Thank you for requesting comments from the public on opportunities to modernize National Environmental Policy Act (NEPA) analyses and documentation and improve the coordination of NEPA processes between all levels of government and the public.

HHP, Inc. is a hardwood sawmill and pallet manufacturer located in south-central New Hampshire. As part of our procurement practices, we rely on access to sustainable timber available on the White Mountain National Forest. We have been directly and negatively impacted by USFS decisions to rescind, delay, re-analyze, withdraw etc. tracts of timber for harvest on the WMNF. We have long practiced and supported sustainable forest management as the only legitimate method to establish long-term forest management policies and decisions on local and national forest levels. HHP, Inc. is an active member of the New Hampshire Timberland Owners Association (NHTOA) and supports modification of NEPA.

It is increasingly common for entities opposed to the original mission of the National Forests—the provision of timber to various classes of wood users—to take advantage of NEPA to drag out the process of analysis and decision making to such a point that little is ever accomplished. HHP, Inc. and the NHTOA believe that NEPA is contributing to the “analysis paralysis” problem plaguing the professionals charged with managing the WMNF and highlighted by U.S. Forest Service Chief Dale Bosworth in testimony before Congress on June 12, 2002.

HHP, Inc. and the NHTOA have two major areas of concern with NEPA and recommends the following modifications:

### Project Alternatives

Within NEPA, land managers proposing a project must also propose alternative projects. The alternative projects must undergo the same level of study and preparation as the proposed project. Because NEPA fails to define how many alternative projects must be studied, land managers (in an effort to head off potential appeals and litigation) must research and prepare an excessive number of alternative projects covering all plausible management options.



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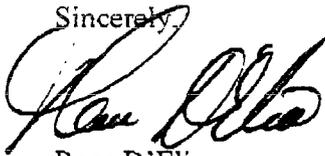
**Recommendation:** Modify NEPA, to limit the number of alternative projects land managers must prepare to no more than two.

**Appeal Standing**

Under current NEPA rules any individual or organization can establish standing at any point in the public involvement process. To derail projects, individuals and organizations opposed to the original mission of the National Forests, use NEPA to obtain interested party status early in a project and wait until a project is near approval before filing their concerns and objections. A recent example of this occurred in New Hampshire where the Conservation Action Project (CAP) failed to provide input on a timber sale during the Environmental Assessment only to raise their environmental concerns after a management decision had been made. Had CAP filed their concerns during the Environmental Assessment the Forest Service could have addressed them in the its management decision (July 26, 2002 letter from Regional Forester Randy Moore to Conservation Action Project's David Carle on appeal 02-09-0042 A215, file code: 1570-1).

**Recommendation:** Within NEPA and the regulations resulting from it establish criteria for becoming an interested party. NEPA and its associated regulations must also contain filing dates that require an interested party to express all their concerns with a project up front during the public comment period.

Sincerely,



Ross D'Elia  
President  
HHP, Inc.

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**To:** NEPA Task Force

**Company Name:** The Whitehouse Council on Environmental Quality

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**From:** Ross D'Elia  
President

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**Subject:** NEPA recommendations

**Message:**

Please forward the attached letter to the appropriate task force member  
Thank You

FAXED  
AUG 20 2002  
HHP, INC.

