

September 20,2002

CQ647

NEPA Task Force
POBox 221150
Salt Lake City UT 84122

To the Task Force:

Thank you for entering this into the record as comment on CEQ's effort to revise NEPA.

I will only comment on one aspect of NEPA, I will leave the technical and scientific issues to better qualified individuals. The overriding issue for the grazing industry in the west is the possibility that permittees, through no fault of their own, or any reason having to do with resource condition, could find themselves unable to continue grazing. This because an agency got out of compliance with NEPA.

It is important to remember that the NEPA compliance status of an ongoing activity is totally unrelated to the environmental soundness of an activity. There are many reasons why an activity that is environmentally sound could be out of compliance with NEPA. NEPA has become a very burdensome process and agencies have limited resources and time to put toward NEPA compliance.

Steps need to be taken in the case of grazing permit renewal to ensure that the permit can continue on a status quo basis any time there is a disruption in the NEPA process. It needs to be recognized that the grazing permit is only allowing an activity to continue that has already had NEPA scrutiny often at both the allotment level as well as the land use plan level. Ranches in most cases are family businesses that operate on limited resources, the disruption of the forage supply can create a severe financial hardship.

Categorical exclusions and tiering off of existing land use plans are probably the best mechanisms to deal with this problem, the details can be left to the technicians that write regulations. Currently language is added annually to the appropriations bill to deal with this problem so the intent of Congress is clear, problems that agencies have in completing NEPA in a timely fashion are not to be turned into financial hardship for family businesses.

Thank for taking time to review these comments, if I can be of any further help please feel free to contact me at the address below, I will also offer the assistance of the Public Lands Council and the National Cattleman's Beef Association also listed below.

Sincerely,
John O'Keeffe
Chairman Public Land Committee, Oregon Cattleman's Association
Vice-Chair Federal Land Committee, National Cattlemen's Beef Association
Oregon Director, Public Lands Council

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