

September 26, 2002

CQ650

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

REF: Council on Environmental Quality, Notice and Request for Comments", 67 FR 45510, July 8 2002.

To Whom It May Concern:

In response to the subject Federal Register notice, I would like to offer the following comments:

I am a strong supporter of the philosophy behind and mechanisms for implementing the NEPA program. While there may be opportunities for "reforming" the NEPA program, I would like to suggest the NEPA process is an important environmental program, and the Council On Environmental Quality (CEQ) should maintain the basic goals and structure of the NEPA. In other words, regardless of any "reforms" undertaken, I do not believe the effectiveness of the NEPA process should be weakened by substantially eviscerating the process in the name of "streamlining" or "progress".

My specific comments are as follows:

1. *What Are the Characteristics of An Effective Joint-lead Or Cooperating Agency Relationship/Process?*

A An effective joint-lead effort involving more than one agency depends foremost on close cooperation BETWEEN ALL RESPONSIBLE PARTIES from the very beginning of the "process" – in the conceptual phase well before any actual planning is underway. This requires that the individual agencies must set aside their own particular agendas as much as possible and appropriate and therefore focus their efforts on the proposed joint project. In essence, this means that a "core team" of managers is assembled from the participating agencies to serve as "lead" managers during the NEPA process. These individuals should be delegated the authority to make key decisions at particular points during the process without necessarily having to go to higher authorities for approval of actions. The core team works closely together to come to a consensus regarding particular action items.

B. An effective joint effort should, before making major decisions, ensure that public involvement opportunities are an integral part of the planning process and that public involvement be initiated as early in the planning and scoping process as possible and/or appropriate, depending upon the nature and extent of the propose projects. Furthermore, every step is taken to ensure that ALL voices are heard in project public participation activities. This requires that all outreach materials be clearly written and understandable by a wide variety of readers/reviewers.

2. What are the barriers or challenges faced in using information technologies in the NEPA process?

A. I believe one barrier that may occur when using information technologies in the NEPA process is the incompatibility of some computer hardware and software packages. Incompatibility of computer-based tools can cause problems when attempting to translate information from one software program to another or from one operating system to another. A failure to ensure that the information posted is in a format/software program that is as universally accessible as possible will result in possibly having a document hopelessly jumbled (because of a loss of formatting, etc.) or worse, the loss of important data. Therefore, when information is posted for review by the public, it should be in a form that is easily downloaded to a wide variety of computers of greatly differing capabilities to handle detailed, and sometimes lengthy, NEPA documents.

3. DO you maintain databases and other sources of environmental information for environmental analysis?

A. I do not maintain databases of information for use in environmental analysis. When I am required to undertake such work, I rely on a variety of library services, and the technical literature, both in paper and electronic format. Alternatively, for extensive analysis, as a project task manager, I rely on the technical consultants to perform, under my direction, the needed data gathering and analysis tasks. I work closely with the consultants to identify the best information to use, how to analyze it, and how to present the results in the most effective manner.

4. What Information Management and Retrieval Tools Do You Use to access, query, and manipulate data when preparing

analyses or reviewing analyses? *What Are the Key Functions and Characteristics of These Systems?*

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A. The selection of Information management and retrieval tools is, in part, dependent upon the type, scope, and difficulty of the project undertaken. Such tools should be relatively easy to use and potentially adaptable to unforeseen circumstances; the cost should not be prohibitive; the operation of the technology and analytical approaches should be such that they, and the results obtained from their use, should be such that the analytical methodology and results can be relatively easily translated into language understood by the layman. That is, the software, analytical approaches, and /results should not be so complex that no one can begin to understand what was done or how the results were arrived at.

5. *What Are Your Preferred Methods of Conveying or Receiving Information About Proposed Actions and the NEPA Analyses and for receiving NEPA documents (e.g., Paper, CD-ROM, Website, Public Meeting, Radio, Television)?*

A. For me personally I prefer paper copies; however, all of the methods identified in the question have their potential uses in the NEPA process. In fact, depending upon the circumstances, I believe that all of the above could be part of an cost-effective NEPA process. Potentially interested parties will vary greatly with respect to their access to information. Therefore, for some in a more remote location, the internet may be more appropriate. On the other hand, for some, a information repository located at a convenient location could be the appropriate source of a variety of information products. The determinant of which communication tool is most appropriate will depend upon the location of the proposed action, accessibility to a central information repository, the socio-economic make up of the potentially affected community and interested parties, and the cost of the proposed communication tool.

6. *What Information Management technologies have been particularly effective in communicating with stakeholders about environmental issues and incorporating environmental values into agency planning and decision makingpublic access)?*

A. See previous comment.

7. What Factors Should Be Considered To Balance Public Involvement and Information Security?

- A. The following factors should be considered in making decisions regarding balancing public involvement and information security:**
- a. The nature and severity of a potential threat to human health and the environment resulting from the proposed action. The greater the threat, the more open the information sharing process should be.**
 - b. The nature and severity of socio-economic impacts of the proposed action on the affected community. The greater the threat, the more open the information sharing process should be.**
 - c. If an issue, the nature of and amount of sensitive information to be reviewed during an analytical process. For example, in the private sector, there may be process-specific information which is of a sensitive nature, and its release could result in a loss of competitiveness.**
 - d. Whether or not there is sensitive information which has no bearing upon the particular action being taken/considered, but which, if released could adversely affect the overall operation of the facility or cause undue concern on the part of stakeholders and other interested parties.**

Thank you for considering these comments.

Sincerely,

Jerry L. Coalgate
6588 Medinah Lane
Alexandria, Virginia 22312