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Associate Director for the National Environmental Policy Act  
Council on Environmental Quality  
730 Jackson Place, N.W.  
Washington, DC 20503

June 25, 2018

**Re: Request for Sixty-day Extension on Update to the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) [Docket No. CEQ-2018-0001]**

The 352 undersigned public interest organizations hereby request a sixty-day extension of the public comment period for the recently noticed Advance Notice of Proposed Rulemaking (ANPRM) on the “Update to the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act.”

This ANPRM opens up the entire set of regulations applicable to almost all proposed executive branch actions, from energy development decisions on our public lands and waters to the construction of industrial facilities and major transportation infrastructure that release vast quantities of air, and water pollution and that will affect our planet’s future. Given that this proposal could fundamentally change how every single agency in the federal government considers the health and environmental impacts of federal decisions as well as public input under NEPA, we believe that a minimum of 90 days is necessary to provide everyone, but especially the public, the time to properly understand and meaningfully respond to the questions outlined in the ANPRM. We note that given the multiple subparts in several of the questions, there are closer to 40, not 20 questions, in the ANPRM. As you well know, many of the questions involve understanding not just the words in the regulation itself, but decades of administrative and judicial interpretation. The current comment period of 30 days is simply not adequate – especially for the public who rely on NEPA as the only way to weigh in on decisions impacting their communities and who must take time off work and away from their families to read the regulations and respond to this notice. Like previous processes accompanying CEQ promulgation regulations, we encourage CEQ to host public forums to listen to people’s experiences and views regarding the NEPA process. Such forums should be held in both urban and rural settings in several areas of the country. Indeed, a 30-day comment period, without a variety of public meetings, strongly suggests a lack of sincere interest in thoughtful comments and broad engagement with the diverse constituencies affected by America’s environmental Magna Carta.

We also request that CEQ give those without access to reliable internet service an opportunity to comment on this ANPRM by providing the option of submitting comments via regular mail. Currently, over 25% of U.S. adults do not have home broadband. However, the ANPRM only allows for comments to be submitted through the Federal eRulemaking portal. A U.S. Forest Service ANPRM released in January of 2018 that proposed to revise the agency’s NEPA regulations provided no less than three different ways to submit comments: online, by email, or by regular mail. This ANPRM has the potential to impact an exponentially larger number of people, and thus there is no reason why CEQ should not similarly accept these same three methods for

comment submission. Additionally, CEQ should provide an opportunity for in-person comments at the public meetings requested above.

For this request of public comment to be meaningful, it is critical that the entire public, not just those with internet access, be allowed to comment. This request is consistent with Question 6 concerning revision of the NEPA regulations to be more inclusive and efficient. Lack of reliable access to broadband, especially in rural, remote areas, further underscores the need to extend the comment period for this ANPRM.

Accordingly, we request the public comment period be extended to a minimum of 90 days, CEQ host public forums in urban and rural settings, and that CEQ provide the opportunity for comments to be submitted via mail as well as in person at the public meetings.

Respectfully submitted,

**350 Bay Area**  
**350 New Orleans**  
**350.org**  
**Alabama Environmental Council**  
**Alaska Clean Water Advocacy**  
**Alaska Climate Action Network**  
**Alaska Wilderness League**  
**Alaska's Big Village Network**  
**All-Creatures.org**  
**Allegheny Defense Project**  
**Alliance for Democracy**  
**Alliance for the Wild Rockies**  
**American Bird Conservancy**  
**American Rivers**  
**Americas for Conservation + the Arts**  
**Amigos de Tres Palmas**  
**Animal Legal Defense Fund**  
**Animal Welfare Institute**  
**Animas Valley Institute**  
**Arizona Mining Coalition**  
**Atchafalaya Basinkeeper**  
**Audubon Naturalist Society**  
**Ballona Institute**  
**Bark**  
**Basin and Range Watch**  
**Battle Creek Alliance**  
**Bay Area – System Change not Climate Change**  
**Berkshire Environmental Action Team (BEAT)**  
**Biofuelwatch**

**Bird Conservation Network**  
**Black Hills Clean Water Alliance**  
**Black Warrior Riverkeeper**  
**Blue Mountains Biodiversity Project**  
**Blue Water Baltimore**  
**Bold Alliance**  
**Boulder County Audubon Society**  
**Boulder Rights of Nature, Inc.**  
**Buffalo Field Campaign**  
**Buka Environmental**  
**Bullitt Foundation**  
**Cahaba River Society**  
**California Brain Tumor Association**  
**California Chaparral Institute**  
**California Environmental Health Initiative**  
**California Native Plant Society**  
**California Sportfishing Protection Alliance**  
**Californians for Alternatives to Toxics**  
**Californians for Western Wilderness**  
**Cascade Forest Conservancy**  
**Cascades Raptor Center**  
**CEMAR**  
**Center for Biological Diversity**  
**Center for Climate Adaptation Science and Solutions, University of Arizona**  
**Center for International Environmental Law**  
**Center for People, Food and Environment**  
**Center for Safer Wireless**  
**Center for Science in the Public Interest**  
**Center for Sierra Nevada Conservation**  
**Central New Mexico Audubon Society**  
**Charleston Audubon**  
**Chesapeake Climate Action Network**  
**Citizens Action Coalition of Indiana**  
**Citizens Against Ruining the Environment**  
**Citizens Against the Newport Silicon Smelter**  
**Citizens Coalition for a Safe Community**  
**Citizens Committee to Complete the Refuge**  
**Clean Air Watch**  
**Clean Water Action**  
**Climate Law & Policy Project**  
**Climate Resilience Consulting**  
**The Clinch Coalition**  
**Coal River Mountain Watch**  
**Coalition for American Heritage**  
**Coast Action Group**  
**Coast Range Association**

**Colorado EcoWomen**  
**Colorado Native Plant Society**  
**Coming Clean**  
**Committee for Green Foothills**  
**Compassion Over Killing**  
**Concerned Health Professionals New York**  
**Conservation Congress**  
**Conservation Kids**  
**Conservation Northwest**  
**Conserve Southwest Utah**  
**Consumers for Safe Cell Phones**  
**CORALations**  
**County News Service**  
**Crawford Stewardship Project**  
**CRSP**  
**Cynthia Howard Architect & Preservation Planner**  
**Dakota Rural Action**  
**DC Environmental Network**  
**DC Statehood Green Party**  
**Deer Creek Valley Natural Resources Conservation Association**  
**Defenders of Wildlife**  
**Delaware-Otsego Audubon Society (NY)**  
**Desert Tortoise Council**  
**Dogwood Alliance**  
**Dolores River Boating Advocates**  
**Don't Waste Arizona**  
**Earth Guardians**  
**Earth Island Institute**  
**Earthjustice**  
**Earthworks**  
**EcoFlight**  
**Eco-Justice Ministries**  
**El Sendero Backcountry Ski and Snowshoe Club**  
**EMF Safety Network**  
**Endangered Habitats League**  
**Endangered Species Coalition**  
**Enterprise Community Partners**  
**Environment and Human Health Inc.**  
**Environment New Jersey**  
**Environmental Protection Information Center**  
**Environmental Protection Network EPN**  
**Eyak Preservation Council**  
**Fairmont, MN Peace Group**  
**Family Farm Defenders**  
**Farmworker Association of Florida**  
**Food Democracy Now!**

**Food Empowerment Project**  
**Foundation for Louisiana**  
**Four Years. Go.**  
**Franciscan Action Network**  
**Friends of Blackwater**  
**Friends of Corte Madera Creek Watershed**  
**Friends of Dyke Marsh**  
**Friends of Harbors, Beaches and Parks**  
**Friends of Merrymeeting Bay**  
**Friends of the Bitterroot**  
**Friends of the Clearwater**  
**Friends of the Earth US**  
**Friends of the Eel River**  
**Friends of the Inyo**  
**Friends of the Kalmiopsis**  
**Friends of the Locust Fork River**  
**Friends of the Northern San Jacinto Valley**  
**Friends of the Sonoran Desert**  
**Friends of the Weskeag**  
**Fund for Wild Nature**  
**GARDEN Inc. (Growing Alternative Resource Development and Enterprise Network)**  
**Gasp**  
**Generation E Political Action Committee**  
**Geos Institute**  
**Gila Conservation Coalition**  
**Gila Resources Information Project**  
**Global Justice Ecology Project**  
**Global Union Against Radiation Deployment from Space (GUARDS)**  
**Glynn Environmental Coalition**  
**Golden West Women Flyfishers**  
**Grand Canyon Trust**  
**Grand Canyon Wildlands Council**  
**Grassroots Ecology**  
**Great Egg Harbor Watershed Association**  
**Great Old Broads For Wilderness**  
**Great Rivers Environmental Law Center**  
**Greater Hells Canyon Council**  
**Green Retirement, Inc.**  
**Green River Action Network**  
**GreenARMY**  
**GreenLatinos**  
**Greenpeace USA**  
**Greg Alan Walter Insurance**  
**Gulf Restoration Network**  
**Hands Across the Sand**  
**Harambee House, Inc./Coalition for Environmental Justice (CFEJ)**

**Heartwood**  
**High Country Conservation Advocates**  
**Hilton Pond Center for Piedmont Natural History**  
**Honor the Earth**  
**Howarth & Marino Lab Group, Cornell University**  
**Humboldt Baykeeper**  
**Idaho Conservation League**  
**Idaho Sporting Congress, Inc.**  
**iMatter**  
**inNative**  
**Institute for Fisheries Resources**  
**International Wildlife Rehabilitation Council (IWRC)**  
**Kentucky Heartwood**  
**Kettle Range Conservation Group**  
**Klamath Forest Alliance**  
**KyotoUSA**  
**Lahontan Audubon Society**  
**Lake Superior Research Institute**  
**Laurie M. Tisch Center for Food, Education & Policy, Teachers College Columbia University**  
**Law for the Environmental Grassroots**  
**League of Conservation Voters**  
**Living Economy Advisors**  
**Local Clean Energy Alliance**  
**Long Beach 350**  
**Long Beach Gray Panthers**  
**Los Angeles Audubon Society**  
**Los Padres ForestWatch**  
**Louisiana Environmental Action Network/Lower Mississippi Riverkeeper (LEAN)**  
**Lower Brazos Riverwatch**  
**Lower Ohio River Waterkeeper**  
**Mankato Area Environmentalists**  
**Maryland Ornithological Society**  
**Maryland Smart Meter Awareness**  
**Mass Forest Rescue Campaign**  
**Miami Waterkeeper**  
**Midwest Pesticide Action Center**  
**Mining Action Group of the Upper Peninsula Environmental Coalition**  
**Moloka'i Community Service Council**  
**Moms Advocating Sustainability (MOMAS)**  
**Mount Graham Coalition**  
**MountainTrue**  
**National Alliance of Community Economic Development Associations (NACEDA)**  
**National Congress of American Indians**  
**National Institute for Science, Law & Public Policy**  
**National Latino Farmers & Ranchers Trade Association**

**National Wildlife Federation**  
**National Whistleblower Center**  
**National Wolfwatcher Coalition**  
**Native Conservancy Land Trust**  
**Native Justice Coalition**  
**Natural Resources Defense Council**  
**Nature Coast Conservation, Inc.**  
**NC WARN**  
**New Jersey Conservation Foundation**  
**New Jersey Highlands Coalition**  
**New Mexico Audubon Council**  
**New Mexico Wild**  
**No Smart Meters or Small Cells LI**  
**Northcoast Environmental Center**  
**Northeast Oregon Ecosystems**  
**Northeastern Minnesotans for Wilderness**  
**Northwest Animal Rights Network**  
**Ocean Conservancy**  
**Ocean Conservation Research**  
**Oceana**  
**Ohio Valley Environmental Coalition (OVEC)**  
**Olympic Forest Coalition**  
**Olympic Park Associates**  
**One More Generation™**  
**Operation HomeCare, Inc.**  
**Orca Conservancy**  
**Oregon Natural Desert Association**  
**Oregon Shores Conservation Coalition**  
**Oregon Wild**  
**Oxfam America**  
**Pacific Coast Federation of Fishermen's Associations**  
**Pacific Rivers**  
**Partnership for Policy Integrity**  
**Partnership for the National Trails System**  
**Partnership for Working Families**  
**Peace and Social Justice Center of South Central Kansas**  
**Pelican Media**  
**Penguin PI LLC**  
**Pinelands Preservation Alliance**  
**Pipeline Awareness Southern Oregon**  
**PolicyLink**  
**Post Carbon Institute**  
**Powder River Basin Resource Council**  
**Prairie Hills Audubon Society of Western South Dakota**  
**Presidio Historical Association**  
**Progressive Caucus Action Fund**

**PSR Arizona**  
**Public Citizen**  
**Public Lands Project**  
**Rails-to-Trails Conservancy**  
**Rainier Audubon Society**  
**Raptors Are The Solution**  
**Regional Association of Concerned Environmentalists (RACE)**  
**Regional Parks Association, Berkeley CA**  
**Richmond Trees**  
**Rivers Without Borders**  
**Rock Creek Alliance**  
**Rocky Mountain Wild**  
**Rural Coalition**  
**Sacramento Audubon Society**  
**Safe Alternatives for our Forest Environment**  
**San Bernardino Valley Audubon Society**  
**San Francisco Baykeeper**  
**San Juan Citizens Alliance**  
**San Luis Valley Ecosystem Council**  
**SanDiego350**  
**Save Nevada's Water: Ban Fracking In Nevada**  
**Save Our Cabinets**  
**Save Our Shores**  
**Save Our Sky Blue Waters**  
**SAVE THE FROGS!**  
**Save the Scenic Santa Ritas**  
**Science and Environmental Health Network**  
**Selkirk Conservation Allinace**  
**Sequoia ForestKeeper®**  
**Shawnee Chapter, Illinois Audubon Society**  
**Shawnee Forest Defense**  
**Shawnee Forest Sentinels**  
**Sierra Club**  
**Sky Island Alliance**  
**Slow Food USA**  
**Smith River Alliance**  
**Snake River Alliance**  
**Soda Mountain Wilderness Council**  
**Song to Gaia**  
**Southern Illinoisans Against Fracturing Our Environment**  
**Spottswoode Winery**  
**Sustain Rural Wisconsin Network**  
**Sustainable Arizona**  
**Swan View Coalition**  
**Talon Scientific**  
**TAP Communications**



**Tennessee Environmental Council**  
**The Bay Institute**  
**The Campaign for Sustainable Transportation**  
**The Coalition for Sonoran Desert Protection**  
**The Interfaith Council for the Protection of Animals and Nature**  
**The Lands Council**  
**The Moving Forward Network**  
**The Rewilding Institute**  
**The Story of Stuff Project**  
**The Urban Wildlands Group**  
**The Wilderness Society**  
**Time Laboratory**  
**Topanga Peace Alliance and MLK Coalition of Greater Los Angeles**  
**Torrance Refinery Action Alliance**  
**TransForm**  
**Transition Cornwall Network**  
**Tre Gatti Vineyards**  
**Tri-Valley CAREs (Communities Against a Radioactive Environment)**  
**Trustees for Alaska**  
**Tulane Institute on Water Resources Law and Policy, Tulane Law School**  
**Turtle Island Restoration Network**  
**Umpqua Watersheds, Inc.**  
**Upper Peninsula Environmental Coalition**  
**Uranium Watch**  
**Utah Physicians for a Healthy Environment**  
**Valley Watch**  
**Wallin Mental Medical**  
**Waterways Restoration Institute**  
**West Montgomery County Citizens Association**  
**Western Colorado Alliance for Community Action**  
**Western Environmental Law Center**  
**Western Nebraska Resources Council**  
**Western Organization of Resource Councils**  
**Western Watersheds Project**  
**Western Wildlife Conservation**  
**Western Wildlife Outreach**  
**Wholly H2O**  
**Wild Connections**  
**Wild Heritage Planners**  
**Wild Horse Education**  
**Wild Nature Institute**  
**WILDCOAST**  
**WildEarth Guardians**  
**Wilderness Workshop**  
**Wildlands Network**  
**Women's International League for Peace and Freedom, U.S./Earth Democracy Group**

**Worksafe**