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January 27, 2020

**Re: Request for 120-day Extension on Update to the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) [Docket No. CEQ-2019-0003]**

The 324 undersigned public interest organizations hereby request a 120-day extension of the public comment period for the recently published Notice of Proposed Rulemaking (NPRM) on the “Update to the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act.”

This NPRM proposes sweeping changes to the entire set of the National Environmental Policy Act’s (NEPA) implementing regulations, which are applicable to more than 50,000 federal actions each year ranging from energy development decisions on our public lands and water to and the construction of industrial facilities and major transportation infrastructure that release vast quantities of air and water pollution 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 a 180-day comment period accompanied by additional public hearings held in each EPA region across the country are necessary to provide everyone, but especially the public, the time to properly understand and meaningfully respond to the major changes contemplated in the NPRM. As the White House Council on Environmental Quality (CEQ) itself has repeatedly stated, one of the primary goals NEPA is to encourage meaningful public input and involvement in federal decision-making.<sup>1</sup>

We note that the 47-page NRPM is extensive both in length as well as in the number of proposed changes to the regulations. A thorough analysis and response to the NPRM will also require understanding its relationship to decades of administrative and judicial interpretation. We also note that CEQ provided a 60-day comment period for a two-page Advanced Notice of Proposed Rulemaking (ANPRM) issued in June 2018. Consequently, the current comment period of 60 days is entirely inadequate and incommensurate with the scope of the NPRM – especially for the public

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<sup>1</sup> White House Council on Environmental Quality “Collaboration in NEPA: a handbook for NEPA Practitioners.” October 2007.

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 the promulgation of new regulations, we encourage CEQ to host additional public forums across the country to listen to people's experiences and views regarding the NEPA process. CEQ has never before considered such sweeping changes to the regulations – only public outreach commensurate to that CEQ undertook when it drafted the original regulations between 1977 and 1979 will ensure broad stakeholder engagement and a complete understanding of how the draft regulations would impact communities, especially frontline communities, around the country. Indeed, it is no accident that the extensive outreach CEQ from 1977 to 1979 led to the unparalleled longevity of the current regulations.

The two proposed public hearings are severely inadequate, forcing both rural and urban stakeholders outside of Denver, Colorado and Washington, DC to expend considerable cost and take time off work to speak in person with the agency proposing these radical changes. Just last week, registration for CEQ's public hearing in Denver sold out in a matter of minutes. For these reasons, it is difficult to interpret a 60-day comment period that includes only two public hearings as anything less than reflective of lack of sincere interest in engagement with the diverse constituencies affected by America's environmental Magna Carta and an affront to the laudable values of public input and government transparency NEPA seeks to impart on the federal decision-making process.

Accordingly, we request the public comment period be extended to a minimum of 180 days and CEQ host additional public forums in urban and rural settings.

Respectfully submitted,

**350 Bay Area**  
**350 Colorado**  
**350 Corvallis**  
**350 Corvallis**  
**350 Dallas**  
**350 Eugene**  
**350 New Orleans**  
**350 Santa Cruz**  
**350 South Bay Los Angeles**  
**350 West Sound Climate Action**  
**350 Yakima Climate Action**  
**Alaska Wilderness League**  
**Alaska's Big Village Network**  
**Alberta Wilderness Association**  
**Alliance for International Reforestation, Inc.**  
**Alliance of Nurses for Healthy Environments**

**American Bird Conservancy**  
**American Rivers**  
**Amigos Bravos**  
**Anacostia Riverkeeper**  
**Animas Valley Institute**  
**Arizona Mining Reform Coalition**  
**Audubon Naturalist Society**  
**Audubon Society of Omaha, Nebraska**  
**Bahr Law Offices**  
**Bark**  
**Basin and Range Watch**  
**Battle Creek Alliance & Defiance Canyon Raptor Rescue**  
**Bayou City Waterkeeper**  
**Berks Gas Truth**  
**Better Path Coalition**  
**Black Hills Clean Water Alliance**  
**Black Warrior Riverkeeper**  
**Bold Alliance**  
**Boston College Law School Land & Environment Program**  
**California Native Plant Society**  
**California River Watch**  
**California Sportfishing Protection Alliance**  
**California Wilderness Coalition**  
**Carrizo Comecrudo Tribe of Texas**  
**Cascadia Wildlands**  
**CAVU (Climate Advocates/ Voces Unidas)**  
**Center for Biological Diversity**  
**Center for Environmental Health**  
**Center for Land, Environment, and Natural Resources, University of California, Irvine**  
**Center for Transforming Communities**  
**Central Colorado Wilderness Coalition**  
**Citizens for a Healthy Community**  
**Clean Energy Action**  
**Clean Ocean Action**  
**Clean Water Action**  
**Climate Action Rhode Island**  
**Coal River Mountain Watch**  
**Coalition for American Heritage**  
**Coalition to Protect America's National Parks, Inc.**  
**Coast Action Group**  
**Coast Range Association**  
**Coastwalk/California Coastal Trail Association**  
**Columbia Riverkeeper**  
**Community Advocate**  
**Conejos Clean Water**  
**Conservancy of Southwest Florida**

**Conservation Law Foundation**  
**Conservation Montgomery**  
**Conservation Northwest**  
**Conservation Northwest**  
**Conservatives for Responsible Stewardship**  
**Conserve Southwest Utah**  
**Corvallis Friends Meeting**  
**Corvallis Sustainability Coalition**  
**Cottonwood Environmental Law Center**  
**Cumberland-Harpeth Audubon Society**  
**Dakota Resource Council**  
**Defenders of Wildlife**  
**Delaware Ecumenical Council on Children and Families**  
**Delaware Riverkeeper**  
**Delaware-Otsego Audubon Soc., Inc. (NY)**  
**Devil's Spring Ranch**  
**Dogwood Alliance**  
**Dolores River Boating Advocates**  
**Don't Waste Arizona**  
**Duke University Environmental Law and Policy Clinic**  
**Duquesne University School of Law**  
**Earthjustice**  
**Earthworks**  
**Ecological Options Network**  
**Emmett Environmental Law & Policy Clinic, Harvard Law School**  
**Endangered Habitats League**  
**Endangered Species Coalition**  
**Environment America**  
**Environmental Action Committee of West Marin**  
**Environmental Advocacy Clinic, University at Buffalo School of Law**  
**Environmental Defense Center**  
**Environmental Defense Fund**  
**Environmental Protection Information Center**  
**Environmental Protection Network**  
**Factory Farming Awareness Coalition**  
**Fairmont Peace Group**  
**Family Farm Defenders**  
**Florida A & M Univ., College of Law**  
**Food & Water Watch; Food & Water Action**  
**For the Fishes**  
**Forest Trust**  
**Fox Valley Citizens for Peace & Justice**  
**Freshinseasonfruit.com**  
**Friends of Animals**  
**Friends of Big Morongo Canyon Preserve**  
**Friends of Dyke Marsh**

**Friends of Gualala River**  
**Friends of Merrymeeting Bay**  
**Friends of Nevada Wilderness**  
**Friends of Penobscot Bay**  
**Friends of Plumas Wilderness**  
**Friends of Sligo Creek**  
**Friends of the Clearwater**  
**Friends of the Columbia Gorge**  
**Friends of the Earth**  
**Friends of the Inyo**  
**Friends of the Kalmiopsis**  
**Friends of the Mississippi River**  
**Friends of the Sonoran Desert**  
**Frosty Hollow Ecological Restoration**  
**Ft. Berthold Protectors of Water and Earth Rights**  
**Geos Institute**  
**Gila Conservation Coalition**  
**Gila Resources Information Project**  
**Global Union Against Radiation Deployment from Space**  
**Glynn Environmental Coalition**  
**Golden West Women Flyfishers**  
**Grand Canyon Trust**  
**Great Egg Harbor Watershed Association**  
**Great Old Broads for Wilderness**  
**Great Rivers Environmental Law Center**  
**Greater Hells Canyon Council**  
**Green America**  
**Green River Action Network**  
**GreenLatinos**  
**Greenpeace**  
**Hands Across the Sand/Land**  
**Harpeth Conservancy**  
**Health Professionals for a Healthy Climate**  
**Healthy Gulf**  
**Hispanic Federation**  
**Howling For Wolves**  
**Humane Society Legislative Fund**  
**Idaho Organization of Resource Councils**  
**Indivisible South Bay LA**  
**Information Network for Responsible Mining**  
**Inland Ocean Coalition**  
**Institute for Wildlife Protection**  
**International Fund for Animal Welfare**  
**International Marine Mammal Project of Earth Island Institute**  
**Iowa Environmental Council**  
**John Muir Project**

**Kentucky Waterways Alliance**  
**Klamath Forest Alliance**  
**Klamath-Siskiyou Wildlands Center**  
**Labor Council for Latin American Advancement**  
**Lapides Foundation**  
**Lassen Forest Preservation Group**  
**Laukahi: Hawaii's Plant Conservation Network**  
**League of Conservation Voters**  
**Living Rivers & Colorado Riverkeeper**  
**Long Beach Alliance for Clean Energy**  
**Long Beach Gray Panthers**  
**Los Padres ForestWatch**  
**Louisiana Audubon Council**  
**Lower Ohio River Waterkeeper**  
**Lower Rio Grande Valley Sierra Club**  
**Madrone Audubon Society, Sonoma County, CA**  
**Maine Audubon**  
**Maine Coalition to Stop Smart Meters**  
**Malach Consulting**  
**Minnesota Native Plant Society**  
**Mississippi River Network**  
**Missouri Coalition for the Environment**  
**Mojave Desert Land Trust**  
**Monmouth County Audubon Society**  
**Montgomery County citizen**  
**Muddy Branch Alliance**  
**MZ Strategies, LLC**  
**National Audubon Society**  
**National Parks Conservation Association**  
**National Trust for Historic Preservation**  
**National Wildlife Federation**  
**National Wolfwatcher Coalition**  
**Native Plant Conservation Campaign**  
**Natural Resources Council of Maine**  
**Natural Resources Defense Council**  
**Nature Coast Conservation, Inc.**  
**Neighbors of the Northwest Branch**  
**Nevada Nuclear Waste Task Force**  
**New Energy Economy**  
**New Jersey Conservation Foundation**  
**New Mexico Environmental Law Center**  
**New Mexico State Senator Elizabeth Stefanics**  
**New Mexico Trout, a 501(c)(3) organization**  
**New Mexico Wilderness Alliance**  
**NM Interfaith Power and Light**  
**Northcoast Environmental Center**

**Northeast Oregon Ecosystems**  
**Northeastern Minnesotans for Wilderness**  
**Northern Plains Resource Council**  
**Northwest Center for Alternatives to Pesticides**  
**Nova Southeastern University College of Law**  
**NY4WHALES**  
**NYC Audubon**  
**O.W.L. Foundation**  
**Ocean Conservancy**  
**Ocean Conservation Research**  
**Oceana**  
**Oil Change International**  
**Olympic Climate Action**  
**Oregon Natural Desert Association**  
**Oregon Physicians for Social Responsibility**  
**Oregon Wild**  
**OVEC-Ohio Valley Environmental Coalition**  
**Pacific Coast Federation of Fishermen's Associations (PCFFA) and Institute for Fisheries Resources (IFR)**  
**Partnership for Policy Integrity**  
**Paula Lane Action Network, Sonoma County, CA**  
**Pelican Media**  
**PennFuture**  
**People for Positive Action**  
**Peoria Audubon Society**  
**Physicians for Social Responsibility PA**  
**Pilchuck Audubon Society**  
**Powder River Basin Resource Council**  
**Prairie Rivers Network**  
**Predator Defense**  
**Public Employees for Environmental Responsibility**  
**Public Lands Project**  
**Raptors Are The Solution**  
**RE Sources for Sustainable Communities**  
**Resource Renewal Institute**  
**RESTORE: The North Woods**  
**Rock Creek Alliance**  
**Rock Creek Conservancy**  
**Rocky Mountain Wild**  
**Rogue Riverkeeper**  
**Rural Alliance**  
**Russian River Watershed Protection Committee**  
**Russian Riverkeeper**  
**Rutgers Law School**  
**Safe Alternatives for our Forest Environment**  
**Salem Audubon Society**

**San Juan Citizens Alliance**  
**San Luis Valley Ecosystem Council**  
**Santa Cruz Climate Action Network**  
**Santa Fe Forest Coalition**  
**Save Our Cabinets**  
**Save Our Saluda**  
**Save Our Shores**  
**Save Our Sky Blue Waters**  
**Save RGV**  
**Save the Manatee Club**  
**Save the Scenic Santa Ritas**  
**ScientistsWarning.org**  
**Scott Gollwitzer, Attorney-at-Law**  
**Selkirk Conservation Alliance**  
**Seven Circles Foundation**  
**Sierra Club**  
**Sierra Club Delta Chapter**  
**Sierra Club Toiyabe Chapter**  
**Sierra club, New Orleans Chapter**  
**Sierra Forest Legacy**  
**Skyline West Neighborhood Association**  
**Soda Mountain Wilderness Council**  
**Sonoma County Water Coalition**  
**South Umpqua Rural Community Parterhship**  
**Southern Environmental Law Center**  
**Southern Maryland Audubon Society**  
**Southern Utah Wilderness Alliance**  
**Southface Energy Institute**  
**Spottswode Winery, Inc.**  
**Strong Prosperous and Resilient Communities Challenge**  
**Surfrider Foundation**  
**Tennessee Clean Water Network**  
**Texas River Revival**  
**The Conservation Fund**  
**The Cultural Landscape Foundation**  
**The Humane Society of the United States**  
**The Land Connection**  
**The Lands Council**  
**The Pew Charitable Trusts**  
**The Wilderness Society**  
**Thronton Creek Legal Defense Fund**  
**Trustees for Alaska**  
**Turquoise Trail Regional Alliance**  
**Turtle Island Restoration Network**  
**Umpqua Watersheds, Inc.**  
**Unexpected Wildlife Refuge**



**Union of Concerned Scientists**  
**University of New Mexico Graduate Resource Center**  
**University of Pittsburgh School of Law Environmental Law Clinic**  
**Upper Missouri Waterkeeper**  
**Upper Peninsula Environmental Coalition**  
**Urban Bird Foundation**  
**Utah Native Plant Society**  
**Wasatch Clean Air Coalition**  
**Washington Environmental Council**  
**Washington Wild**  
**Watts Branch Watershed Alliance**  
**WE ACT for Environmental Justice**  
**West Montgomery County Citizens Association**  
**Western Colorado Alliance**  
**Western Environmental Law Center**  
**Western Organization of Resource Councils**  
**Western Values Project**  
**Western Watersheds Project**  
**Whidbey Environmental Action Network**  
**Widener University Commonwealth Law School**  
**Wild Connections**  
**Wild Horse Education**  
**Wild Watershed**  
**Wild Zone Conservation League**  
**WildEarth Guardians**  
**Wilderness Workshop**  
**WildWest Institute**  
**Willamette Law Group**  
**Willamette Riverkeeper**  
**Windheim EMF Solutions**  
**Winter Wildlands Alliance**  
**World Wildlife Fund**  
**Youth Climate Action Now Corvallis**