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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