Aug. 16, 2019

The Hon. Victoria Christiansen, Chief  
U.S. Forest Service  
1400 Independence Ave, SW  
Washington, DC 20250-1111  
Victoria.christiansen@usda.gov

NEPA Services Group  
c/o Amy Barker  
USDA Forest Service  
125 South State Street, Suite 1705  
Salt Lake City, UT 84138  
Nepa-procedures-revision@fs.fed.us

Re: Forest Service Proposal to Revise National Environmental Policy Act Regulations, RIN 0596-AD31

Dear Chief Christiansen and Ms. Barker,

Thank you for this opportunity to comment on the Forest Service’s proposal to modify its National Environmental Policy Act (NEPA) regulations. Western Leaders Network, a nonprofit organization of 300 local and tribal elected officials across the Interior West, strongly opposes the Forest Service’s proposal.

The Forest Service manages millions of acres of land across the West, and its practices are of significant concern and relevance to western communities. Forest Service lands are closely intertwined with our communities’ economies and quality of life, and the health of both depends on a solid partnership with the agency. For the past 50 years, the National Environmental Policy Act (NEPA) has played a crucial role in that partnership by requiring federal agencies to evaluate and disclose the environmental impacts of their proposed actions through a public process that includes citizen input. Wildfire mitigation efforts and wildlife protection and management are just a few examples where NEPA comes into play, requiring cooperation and collaboration between local governments and the Forest Service.

The Forest Service’s proposed modifications to the NEPA process is intended to streamline the review and implementation of projects. However, the proposal as written has the potential to have the opposite effect. The proposal removes public comment opportunities on projects that the Forest Service deems unlikely to have significant impacts. But by limiting public input, the Forest Service could be inviting legal challenges that will, in fact, delay projects.

Moreover, the proposal exempts a range of forest management activities – including logging, road construction and conversion of trails to Forest Service roads – from environmental analysis and public review. Not only does this undermine NEPA’s core principles of transparency, accountability, public involvement and science-based decision-making, it undermines the necessary partnership between local, western governments and federal agencies.
The proposed modifications come at the unacceptable cost of excluding the public from the Forest Service’s decision-making processes. As elected officials, we collectively represent a large population across the Interior West. Our residents deserve the opportunity to participate in and comment on projects that directly affect our lives. Our national forests – and as a result, our communities – would suffer in the long run.

For these reasons, Western Leaders Network respectfully urges the Forest Service to withdraw its proposal and seek an alternative that does not disregard due process, threaten the health of our national forests or endanger local economies across the West.

Sincerely,

Gwen Lachelt, Executive Director
Western Leaders Network