



March 6, 2020

Council on Environmental Quality
730 Jackson Place NW
Washington, DC 20503

RE: Docket Number CEQ -2019-0003

Dear Council on Environmental Quality,

Rivers Alliance of Connecticut was formed to fight for sound water policies at the state and federal levels and to advocate for any person or group striving to protect water. We oppose many of the changes proposed in the “Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act.” This attempt to modernize NEPA will cripple our nation’s bedrock environmental program.

A priority of Rivers Alliance is to defend the public’s right to protect their natural resources. NEPA provides a process that allows the public participate in ensuring that government decisions are informed by an analysis of environmental impacts. In many ways, these changes limit a citizen’s ability to weigh the benefits of a project against any environmental harm that may result.

Government regulation is often maligned as a hindrance to economic growth, particularly regulations that are meant to protect our air, water and other natural resources. While a roll back in regulations may provide an economic benefit to a small segment of our society in the short term, the reality is that when something goes wrong that would have been prevented by sound laws, regulation and permitting, the health of our citizens and local state, or national economies suffer.

Please do not incorporate the following proposed changes to NEPA regulations:

1. **NEPA MUST have the ability to look at cumulative impacts.** Do not eliminate the terms “cumulative” and “indirect” from the definition of “effects.”
2. **Do not narrow the scope of actions.** NEPA must apply to all “major federal actions” as currently covered by NEPA.
3. **Do not let the fox watch the henhouse.** The proposed changes allow the applicants to prepare their own environmental analysis. The entity doing the analysis should not have any conflicts of interest or be beholden to the applicant in any way.
4. **Do not authorize actions prior to completion of the NEPA process.** Particularly authorizations that include the phrase, “including, but not limited to.”

5. **Do not leave us no choice.** All reasonable alternatives to a project must be fully evaluated for the decision making process on a project to be fully transparent.
6. **NEPA or nothing.** Agencies should not be permitted to shop around for an environmental review process. It is imperative that agencies comply with the review and public participation requirements of NEPA.

Thank you for the opportunity to comment on the proposed regulations. It is my sincere hope that the work of CEQ remains focused on protecting our environment from harm and that the intentions of our National Environmental Protection Act are honored. **We urge CEQ to withdraw the notice of proposed rulemaking and retain the existing implementing NEPA regulations.**

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alicea Charamut', written in a cursive style.

Alicea Charamut
Executive Director