

Statement – White House Council on Environmental Quality

February 25, 2020

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Defend Our Future

Good morning, my name is Monica Nerz and I currently intern for Defend Our Future in DC who I will be speaking on behalf of today. As a young person, this rollback is a major concern to me.

NEPA is the foundational bedrock for America's environmental policies and has served the nation's interests well in ensuring there is an informed federal decision-making process over the past 40 years. NEPA requires federal agencies to establish better decision-making processes by taking environmental impacts into consideration as a result of their actions, such as mitigation practices and possible alternatives.

The proposed technical changes in the 47 pages in the federal register not only deserves, but *requires* a longer public comment period than the 60 days CEQ has allotted. Given the significance of the NEPA process, it deserves more than 2 hearings as both Denver's public hearing and today's hearing sold out in a matter of *minutes* of the opening. The limited opportunity for public participation here runs counter to the fundamental purposes of NEPA to inform the public and ensure agencies fully weigh the impacts of their actions on the public.

The proposal seeks to exclude requirements to evaluate "cumulative" effects and potentially "indirect effects" as well. Both cumulative and indirect effects have played a vital role in requiring federal agencies to take climate impacts into consideration for their actions, particularly in oil and gas leasing. This move may be illegal, which would run contrary to the decades of practice and CEQ guidance, in addition to the case law interpreting the statute.

The proposal would in effect, phase out mandatory consideration of climate under NEPA, aiding to the persona of climate denialism. Removing this requirement would not only be a bad idea for public health and our environment, but it will ultimately cost taxpayers more for projects that are not built to be resilient.

We *cannot* allow this proposal to move forward, as young people around the country will disproportionately experience the effects of this roll-back in the future as a result. It is critical that we have a voice in the review process. And for these reasons, Defend Our Future opposes the proposed changes to the rule.

Thank you.