

COUNTY OF RAVALLI



March 10, 2020

The Honorable Mary Neumayr, Chairman
Council on Environmental Quality
730 Jackson Pl, NW
Washington, D.C. 20503

Re: Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act (Docket: CEQ-2019-0003)

Dear Chairman Neumayr,

On behalf of Ravalli County, Montana, we write to offer comments in response to the Council on Environmental Quality (CEQ) proposed rule updating the implementation of the National Environmental Policy Act (NEPA). Counties appreciate the opportunity to offer input on these proposed revisions that will directly impact the ability of local governments to accomplish our mission of public service.

As intergovernmental partners with federal agencies, counties have a direct interest in any proposed changes to the NEPA process. Counties support revising NEPA in order to strengthen the involvement of local governments in the federal decision-making process, including clarifying the cooperating agency definition, and to expedite project analyses that deliver final decisions in a more timely and effective manner.

Counties believe that cooperation should be ongoing and not just limited to specific points within the NEPA process. Early, consistent and meaningful engagement with state and local partners is vital to the development and implementation of effective environmental policies, programs and regulations. Engaging state and local officials in stakeholder meetings on a regular basis is critical to ensure transparency and open lines of communication.

Additionally, the Administration should vest the greatest possible authority in local and regional offices of the various federal agencies to enter into formal agreements with state and local partners, including allowing state and local governments to conduct portions of, or provide critical data for, the NEPA analysis. We are also supportive of language directing lead agencies to meet with cooperating agencies at the latter's request, which will further ensure the ability of counties to offer specific input on environmental assessments (EA) and environmental impacts statements (EIS).

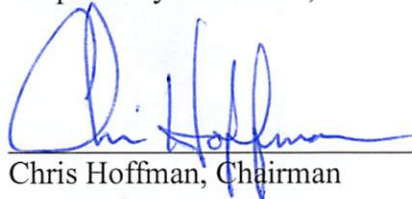
Counties support the broader use of categorical exclusions (CE) under NEPA to address threats to communities or watersheds, reduce the risk of catastrophic events and ensure the timely construction and maintenance of critical transportation and water infrastructure. Counties also recommend that federal agencies work with state and local officials to ensure that proposed actions and CEs are consistent with state and local infrastructure development and land management plans. States currently work with federal officials through consistency reviews to synchronize federal and state plans and ensure that both levels of government are working toward the same goals. Expanding and mandating such reviews for federal agencies with counties will create a better relationship and result in improved decision-making moving forward.

Local governments often find the NEPA process to be cumbersome and inefficient. Administrative burdens alone can be overwhelming for counties whose resources are limited. The proposed page and time limitations for EAs and EISs will ensure projects are appropriately studied within a reasonable timeframe. Additional requirements for federal agencies to formally request comments from all impacted county governments, rather than just county or other local environmental agencies, before an EIS is finalized will help to guarantee that local input remains an essential component of the NEPA process.

The primary function of county governments to create healthy, safe and vibrant communities for our citizens. As both regulating and regulated entities, counties are tasked with the mission of ensuring air, water and land resources are protected for our communities.

Ravalli County appreciates the opportunity to offer comments on the proposed revisions to NEPA implementation. It is imperative that NEPA analyses are conducted in a consistent and timely manner that balances the need for environmental protection with improved community development. As committed stewards of the environment with significant infrastructure responsibilities, counties support common sense reforms to the federal permitting process and subsequent regulations. We commit to continue to work with our federal partners to achieve our shared environmental, economic and infrastructure goals.

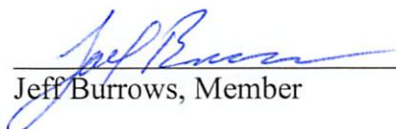
Respectfully Submitted,



Chris Hoffman, Chairman



Greg Chilcott, Member



Jeff Burrows, Member