

January 28, 2020

Ms. Mary Neumayr, Chairman
Council on Environmental Quality
730 Jackson Place, N.W.
Washington, D.C. 20503

Re: 55 Great Lakes Groups Request an Extension of Comment Period and Additional Hearings: Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act - CEQ-2019-0003

Dear Chair Neumayr:

The undersigned Great Lakes and Midwest based groups request (1) a 120-day extension of the public comment period, and (2) additional hearings for the recently noticed Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA).

The proposed changes to the Council on Environmental Quality (CEQ) regulations are significant and extensive, and purport to control all federal agencies in their NEPA procedures. Given the scope, nature, and potential impacts of the proposed regulations, we believe at least a 180-day comment period is warranted. In addition, we request CEQ hold a hearing in the Great Lakes region to hear from the broad range of Great Lakes voices on these proposed changes.

NEPA is a foundational environmental law and for 50 years it has provided the public a voice in federal projects from highways to pipelines. NEPA reviews are certainly as important today as they were when the law was first passed, if not even more critical in the face of the worsening climate crisis and other increasing environmental stressors.

Under the current NEPA regulations, environmental reviews must thoroughly explore and disclose direct, indirect, and cumulative effects. This includes impacts on water and air quality, as well as how federal actions will contribute to climate change. As groups focused on protecting the Midwest and the Great Lakes, we are deeply concerned about how the proposed regulatory changes will impact the Great Lakes, which comprise the largest freshwater ecosystem on Earth, contain 20% of the world's freshwater supply, and provide drinking water to over 40 million people. The Great Lakes watershed supports a wealth of wildlife and plants that depend on clean water, and the commercial and recreational fishing in the Great Lakes alone injects more than \$7 billion a year into the economies of the surrounding states.

Climate change is a significant threat to the Great Lakes ecosystem and the surrounding communities and economies that rely on them for safe drinking water, commerce, industry and recreation. The changing climate is already affecting water levels, encouraging the spread of invasive species, and encouraging eutrophication and the spread of toxic algal blooms. CEQ must fully consider how the proposed regulations would exacerbate these and other threats to the Great Lakes and surrounding region.

The initial 60-day comment period is inadequate and we request that the comment period be extended to at least 180 days. We also request that CEQ hold additional public hearings, including at least one in the Great Lakes region. The proposed regulations are too significant to constrain the ability of the public to fully participate in the process.

Respectfully submitted,

Advocates for a Clean Lake Erie
Alliance for the Great Lakes
Bolte Real Estate
Center for Neighborhood Technology
Citizens' Greener Evanston
Clark Street Beach Bird Sanctuary
Committee on the Middle Fork Vermilion River
Concerned Citizens of Cattaraugus County
Decatur Area Retired Teachers Association,
Design Green Landscapes
Dominican Sisters ~ Grand Rapids
Earth-Whys, LLC
Environmental Law & Policy Center
Evanston North Shore Bird Club
FLOW
Freshwater Lab
Friends of the Chicago River
Friends of the Rouge
Great Lakes Watershed Opportunities, LLC
Green Team, Unitarian Church of Evanston
Headwaters Chapter Izaak Walton League of America
Holy Spirit Missionary Sisters, USA-JPIC
Illinois Council of Trout Unlimited
Illinois Division of the Izaak Walton League
Illinois Environmental Council
Izaak Walton League of America - Ohio Division
Izaak Walton League of America Dwight Lydell Chapter
Izaak Walton League of America Harry Enstrom Chapter
Izaak Walton League of America National Great Lakes Committee
Izaak Walton League of America Penn.State Division
Izaak Walton League of America- Dwight Lydell Chapter
Jack Bradley Realty Company
Lake Erie Charter Boat Association
League of Women Voters Lake Michigan Region
League of Women Voters of Indiana
League of Women Voters of Wisconsin
MI Soil and Water Conservation Society
Michigan Wildlife Conservancy
Milwaukee Riverkeeper
Milwaukee Water Commons

Minnesota Environmental Partnership
National Wildlife Federation
New York State Division, Izaak Walton League of America
North Park University and Evanston Great Lakes Watershed Collective
Northern Initiatives
Ohio Wetlands Association
Onondaga Audubon
Religious Coalition for the Great Lakes
River Revitalization Foundation
Sisters of the Holy Cross
Tip of the Mitt Watershed Council
The Spirited Gardener, Inc.
Unitarian Universalists for Social Justice
Watershed Collective
Wisconsin Metro Audubon Society

