

My name is Cheryl Wasserman. I am a retired EPA veteran of 43 years. I head the Environmental Protection Network's NEPA/Infrastructure team. EPN offers bipartisan expertise of former EPA career staff and confirmation-level appointees. Detailed written comments will be posted.

We strongly object to CEQ's proposed regulations.

**First, the call for modernization rings hollow.** Lack of resources has been the major cause for delay but agency budgets are being slashed.

**Second, these regulatory changes will not reduce delay.** They are so inconsistent with NEPA, Congressional intent and years of practice it is reasonable to expect protracted litigation.

**Third, these changes are consequential. We stand to lose the value NEPA uniquely offers** to address some of our most pressing environmental challenges *like building climate resilient infrastructure, stewarding resources and restoring community economic prosperity*, all of which require the very careful design, collaboration, interdisciplinary balancing, intergovernmental and public process that NEPA requires for agencies to use "all practicable means and measures"...not just their statutory authority.

The proposal fails the American people by:

- Removing NEPA's mandates, severely reducing its application and limiting alternatives and contributions to federal agency statutory authority

It fails the American people by:

- Eroding the integrity of environmental reviews, relying solely on current information, removing consideration of indirect and cumulative impacts, removes the word "assess" using only "consider" when NEPA clearly asks for "study" and courts ask for a "hard look" and removing conflict of interest prohibitions while expanding who can carry out the analysis for federal agencies.

It fails the American people by:

- Ignoring public and agency comments that do not come at the early stages of scoping, by reducing transparency and agency responsiveness.

It fails the American people by:

- Sacrificing quality by rigidly imposing one size fits all page counts and schedules for both NEPA and permitting.

**Fourth, drivers for NEPA compliance are undermined.** Referrals to CEQ would become a closed door complaint forum on behalf of project proponents based on costs of delay. It introduces a new agency self certification of NEPA compliance to which the judiciary will likely defer, and new requirements for bonds and stays in favor of project proponents both of which will make citizen redress more difficult.

**50 years of NEPA progress, a national and international treasure, would be shredded.**