



MISSISSIPPI FARM BUREAU FEDERATION

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February 2, 2006

NEPA Draft Report Comments
c/o NEPA Task Force
Committee on Resources
1324 Longworth House Office Building
Washington D.C. 20515

RE: Comments on the Initial Findings and Draft Recommendations

To Whom It May Concern:

The Mississippi Farm Bureau Federation (MFBF) appreciates the opportunity to provide comments regarding the task force findings and draft recommendations to improve and update the National Environmental Policy Act. The Task Force performed a thorough and comprehensive review of how NEPA has worked or not worked over the years. The Draft Report did an excellent job in summarizing the record with due consideration for all viewpoints.

Delays in The NEPA process are of major concern to MFBF. The clarification of what is a "major federal action", would assist in speeding up the process by an agency knowing what documentation needs to be completed and not having to wait on that clarification to come through either from litigation or another agency making that declaration.

Enhancing public participation is a key revision, local communities until this point has had little say on projects that could greatly benefit their community, ex: sale of timber from Federal owned forest land, payment from these sales usually goes toward the local county school district or some other local government function that depends on that revenue. Also, areas that have flood control problems, more local response is needed so an agency can really see the effects the project will have on that community. A cost/benefit ratio should be developed to consider the community impacts and the environmental impacts.

The recommendation to add a citizen suit provision is strongly opposed by MFBF. These provisions do nothing more than increase the number of lawsuits and bases upon which litigation can be brought. Farm Bureau policy supports elimination of citizen lawsuits from environmental statutes, not the addition of new provisions.

The recommendations for clarifying alternative analysis are generally supported by MFBF. We do feel that reasonable alternatives should be limited to those that are economically and technologically feasible. In the second recommendation, if the no action alternative is defined as non-renewal, a full analysis of environmental and socioeconomic factors should be required.

NEPA or implementing regulations should also clarify the level of analysis that is necessary to comply with NEPA. Fear of litigation drives agencies to analyze a variety of factors in much greater detail than is necessary to satisfy the intended requirements of NEPA. This leads to greater delays, commitment of more resources, and very little in return. Greater clarification of expectations would provide greater certainty for agencies and also possibly reduce litigation.

MFBF appreciates the work the task force has done on the recommendations and hopes we can move forward with these possible revisions. MFBF appreciates the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Brook Stuart". The signature is fluid and cursive, with the first name "Brook" and last name "Stuart" clearly distinguishable.

Brook Stuart
Environmental Programs Associate