

Heather M. Hillary
331 S. Mercer Apt. 20
Bowling Green, Oh 43402

NEPA Task Force,

Upon reading your *Initial Findings and Draft Recommendations*, it became very clear to me that a vital part of NEPA's success is public participation. This is where my greatest concerns have originated from. Much time and consideration in your report was devoted to clearly stating the importance of public participation. However, when it came to the recommendations portion of the report to improve and modify NEPA to increase its effectiveness, the section devoted to reforming public participation were very limited and seemed rather trivial considering the amount of significance public participation plays in the success of the NEPA process.

Repeatedly within the *Initial Findings and Draft Recommendations* the importance of public participation is expressed. On page 22 under the heading "Public Participation, it is noted, "Public participation, usually through scoping and public comments, is a central part of the NEPA process. Nearly every witness and comment that mentioned public participation suggested that without it, NEPA would not be successful." Such key terms here include "central part" and "would not be successful". They simply stand to reiterate the idea of the extreme necessity of public participation to the success of NEPA. It should also be noted that these words are not those expressed by concerned environmental groups or citizens, but by that of your own institution. Therefore, it seems imperative to include heavier consideration for improvements in the area of public participation.

It is understandable that taking into consideration the magnitude of comments received by the NEPA organization would be difficult. This is why the first suggested recommendation is increasingly important. Recommendation 2.1 stated, "Direct CEQ to prepare regulations giving weight to localized comments." While this is an important and much appreciated step towards increased public participation, there still may be some concerns here. Although this recommendation is attempting to make smaller groups or individual citizens feel as if their input will be considered and accounted for, the average citizen may still have difficulty accessing the necessary resources and information to create an impressionable argument. Despite financing and staffing shortages in the NEPA organization, some system of making important documents involving a certain community or business need to be made more accessible and understandable to the people who may be affected most by the outcomes. Average citizens may feel intimidated by this process or simply not understand the legal language of the important documents. Therefore an attempt to make the documents more "people friendly" is necessary to encourage more average citizen participation.

The second recommendation dealt with trying to resolve the difficulty of reading and deciphering important pieces of information from huge EIS reports. Recommendation 2.2 reads, "Amend NEPA to codify the EIS page limits set forth in 40

CFR 1502.7.” Under this recommendation the length of EIS reports should now be usually 150 pages and no more than 300 pages for complex issues, which significantly reduces the size of current EIS documents. Although this recommendation will drastically be decreasing the amount of report to read through, it may still not be enough. Imagine an issue affecting corn farmers who would like their ideas to be heard in order to help protect their farmland. Are they expected to read through 300 page legal documents with any success? Not only are these documents very difficult to understand, but the issue of how much time that would consume is also a concern.

Overall, I feel increased public awareness and participation are necessary to the improvement and success of NEPA. While I believe the recommendations thus far have made a valiant effort towards improving and increasing public participation, it may simply not be enough. Throughout the *Initial Findings and Draft Recommendations* report, it was made abundantly clear by providing repeated accounts of how necessary public participation is to this organization. However, the recommendations simply did not seem to give due respect to the importance on this issue. Therefore, I believe added consideration must be made on the topic of public participation.