



February 2, 2018

Submitted via <https://cara.ecosystem-management.org/>

NEPA Services Group, c/o Amy Barker
USDA Forest Service
Geospatial Technology and Applications Center
2222 West 2300 South
Salt Lake City, UT 84119

Re: National Environmental Policy Act Compliance

Dear Ms. Barker:

Western Energy Alliance appreciates the opportunity to provide public input on how the U.S. Forest Service (USFS) can increase the efficiency of its environmental analysis pursuant to the National Environmental Policy Act (NEPA). We strongly support USFS's intention to improve its NEPA procedures while honoring its environmental stewardship responsibilities.

Western Energy Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas across the West. The Alliance represents independent, the majority of which are small businesses with an average of fifteen employees.

We encourage USFS to reform its NEPA compliance process to reduce delays and streamline permitting of oil and natural gas development on public lands. Delays caused by the NEPA process discourage Alliance members from operating on USFS lands, thereby reducing revenues that would be generated for the federal government and limiting domestic energy production.

Duplicative layers of NEPA review are a prime cause of the delays associated with permitting on USFS lands. In order to streamline NEPA compliance, USFS should expand the use of categorical exclusions (CX) and determinations of NEPA Adequacy (DNA). These tools would preclude the need for environmental assessments (EA) of oil and natural gas projects when an existing NEPA document applies to the project in question.

Land use plans and environmental impact statements (EIS) take years to develop and contemplate appropriate restrictions on development in the planning area. Requiring an EA for a project that has already undergone the land use planning and EIS process is redundant and unnecessary, and merely serves to delay development. Using CXs and DNAs in place of EAs would significantly reduce the timelines associated with oil and natural gas permitting and would conserve USFS resources and staff time that could be better spent elsewhere. We encourage USFS to issue guidance regarding the appropriate level of NEPA analysis required at the project level.

USFS should also expand the use of third-party consultants for the preparation of NEPA documents. Doing so would shift the burden for NEPA preparation from USFS staff to the project proponent, while still preserving the authority for final review and approval. USFS could prepare templates for these documents that would guide the consultants in preparing the documents and reduce the need for extensive editing. The templates would also ensure consistency across projects, which would increase certainty for project proponents.

Finally, USFS should strive to meet the timelines established by the *Presidential Executive Order on Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure*. Environmental reviews should be completed within two years of publication of the notice of intent. By expanding the use of CXs and DNAs, as suggested above, USFS would be able to devote more resources to EISs, which will help them meet the two-year deadline.

Western Energy Alliance supports USFS's review of its NEPA processes and encourages streamlining them in order to promote resource development on public lands. Doing so would encourage oil and natural gas companies to operate on USFS lands while providing the regulatory certainty necessary for those projects. Thank you for the opportunity to submit comments, and please do not hesitate to contact me with any questions.

Sincerely,



Tripp Parks
Manager of Government Affairs