

March 10, 2020

Chairperson Mary B. Neumayr
Council on Environmental Quality
730 Jackson Place, N.W.
Washington, DC 20503

Sent via Fax: 202-456-6546

Re: Docket ID CEQ-2019-0003; Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act

Dear Chairperson Neumayr:

I am writing on behalf of the City of Palo Alto, California, to express our community's opposition to the proposed changes to the National Environmental Policy Act (NEPA) as set forth in CEQ-2019-003.

The City of Palo Alto has long been a leader in sustainability; reducing its carbon impacts, greenhouse gas emissions, and resource consumption for twenty years and serving as a role model for others. We join with environmental advocates throughout the nation in expressing our concerns over the arbitrary and difficult deadlines proposed for environmental impact statements and assessments.

We are particularly troubled by several elements of the proposed changes to NEPA, including:

- The elimination of climate change analysis of projects, including the effects of greenhouse gasses from projects on federal lands;
- The notion that environmental analysis should focus on "relevant" human stressors and the removal of requirements to address cumulative effects, thereby excluding future impacts that may take years to become evident;
- Naming the federal government as the sole arbiter on many of its own decisions, thereby removing critical oversight by states, tribal entities, local governments and the public; and
- Restricting public comment and limiting the legal standing of impacted communities.

We are also concerned that the proposed changes will have a disproportionate impact on marginalized communities, increasing their pollutant exposure and diminishing public health outcomes.

We in local government are committed to transparency and accountability in conducting the public's business and we expect the same from our federal government. The proposed changes to NEPA would unfairly deny us a reasonable opportunity to be informed of changes that could impact our community and the practical ability to comment on their consideration.

It is imperative that decision makers gather all information including the public's input and an analysis of comprehensive environmental impacts before final approvals are issued. The proposed changes to this essential democratic process would undermine the important role that NEPA has played for half a century.

Thank you for your consideration of our concerns.

Sincerely,



Adrian Fine, Mayor
City of Palo Alto

cc: Palo Alto City Council
City Manager Ed Shikada
City Attorney Molly Stump
Hon. Anna G. Eshoo, Member of Congress
Hon. Dianne Feinstein, U.S. Senate
Hon. Kamala Harris, U.S. Senate

