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### Comment:

NEPA Recommendation. First, involve right people, replace Obama administration people, which means including local and state governments from the beginning. But Quite often in past administration, Federal agency officials update on actions they've already taken or will take. The states are partners in natural resource management and rather than being updated, they should be included in the planning and the evaluation process to ensure that our people are represented in the spirit in which NEPA was enacted. States were not created by the Federal Government; rather, Federal Government was created by states. States have governing responsibilities under law that cannot and should not be set aside. Clearly, States have shared and concurrent jurisdiction with the Federal agency managers. When U.S. Forest Service and the Bureau of Land Management oversee the land management responsibilities they have, the states have primacy over wildlife management, air quality, water quality, solid waste disposal, and water rights management on those very same lands. In other words, States have a joint or shared responsibility that requires full partnership, not just a close relationship. Mutual respect and benefit characterize a partnership. Take the handcuffs off the states. First recommendation ; focuses on the need to be partners with state and local governments. We need to help people on land feel good about stewardship in control of their choices so they can pass something along to their children that's better than what they receive show in plain and simple actions that the environment, the economy, and the community are compatible. The citizens are tired of the judicial gridlock and they're feeling left out of the process. They are willing and able to participate. Local government involvement, particularly early in the process, can greatly reduce conflicts in litigation, which is an extraordinary cost to our government. Second recommendation; is that coordination among and within agencies has to be improved. We have duplication of environmental analyses, to detriment of process and expense of Federal Government. We could redirect many of our financial resources if they were only better utilized. Poor coordination among the project proponents, lead agencies, and third parties that are hired to conduct the analysis does not always occur. Third Recommendation: inconsistencies among and within agencies have to be reduced. We have Forest Service management on permit allotments in some states. where one forest requires only grazing allotment holder to do oversight, second forest requires officials only in the Forest Service to do the monitoring, and the third forest allows the policy to change from district to district. Speak with one voice, Remove Past admin. Activists. Fourth Recommendation: training of Federal agency personnel needs to be improved and increased. Word is not getting from the CEQ regulations down to field. Even the CEQ regulations very clearly cover economic and community impact and participation of the states; yet, it's not at all implemented at the local level. There has to be a recognition of that legitimate role for state and local government. Even understanding the difference between EAs and EIS's is not even clear down at the local level. There need to be consistency

and reasonable alternatives, clear, concise documents that use plain language and limits on the volume of the paperwork. In the words of the CEQ regulation, the goal is to be analytic, not encyclopedic. More meeting with local community and training. Fifth Recommendation; there must be real scientific, substantive basis for asking for how to manage so that we avoid the endless inquiries and unnecessary data collection. Use of adaptive management, which National Academy of Sciences calls process where management and research are combined so that the projects are specifically designed to reveal causal relationships between interventions and outcomes to maximize learning. Regulations should be built upon adaptive management and trust. Make a decision based upon the best information at that time, don't try to cover every possible contingency. You can always ask one more question that starts off with "what if." Make the decision, get underway and monitor the performance and if there is impact, adapt to correct the problem. Use accurate science and modern technology and train the people to be objective. The opportunity is there to be cooperation and coordination among the various parts. Six Recombination: Amend NEPA to specifically require Federal agencies to cooperate with states and counties. Innovative environmental policies come about when states can act as laboratories of democracy. States are important in the Federal/state environmental partnership because there is no such thing as one-size-fits-all government. The states, where government is closer to the people, are the proper entities to implement environmental laws and policies. \*🌐

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