

THE AMERICAN ALPINE CLUB



Taylor Luneau – Public Hearing Testimony
February 11, 2020
Docket Identification No: CEQ-2019-0003

Hello, and thank you for the opportunity to offer comment today,

My name is Taylor Luneau and I am the Policy Manager of the American Alpine Club, a non-profit based in Golden, CO with 25,000 members nationally. Since our founding in 1902, the American Alpine Club has worked hard to protect cherished mountain ecosystems and to share our passion for climbing and outdoor recreation. Alongside our partners at the Outdoor Alliance, a coalition dedicated to protecting public lands and waters for human powered recreation, we unite the voices of outdoor enthusiasts to protect and restore recreation landscapes across the country.

I'm here today to speak in opposition to the Trump Administration and the Council on Environmental Quality's proposed changes to the regulations for implementing the National Environmental Policy Act. NEPA is an essential pathway for the outdoor recreation community to engage in Federal actions that affect public lands and waters, and the proposed CEQ regulation changes will adversely affect the outdoor community's ability to do just that.

At its core, NEPA mandates informed decision making, based on sound science and requires that, to the fullest extent possible, all agencies of the federal government take a hard look at environmental consequences prior to issuing a decision. NEPA declares a broad national commitment to protecting and promoting environmental quality and the CEQ rules are influential in shaping agency implementation of the statute.

As climbers, skiers, mountain bikers, and boaters, we observe climate impacts first hand and are particularly concerned with the proposal to eliminate the cumulative impacts analysis. In a time of climate crisis, the outdoor recreation industry, which accounts for 2.2% of the nations' GDP, cannot afford such a rollback in environmental analysis.

Additionally, we are concerned by the arbitrary deadlines and page limits for environmental reviews. While we are not averse to thinking creatively around increasing NEPA's efficiency, we believe that science and the complexity of the proposed action must dictate the term of the environmental review, otherwise important recreation destinations and the voice of the outdoor community are at risk of being left out of the analysis.

Among other items contained in this proposal, we oppose the redefining of the terminology "major federal action" as it will limit the scope of NEPA and place

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important recreation destinations at risk of unreasonable development - AND - We oppose the proposal to allow Industry to conduct their own environmental reviews and define the Purpose and Need of a project, which will introduce serious conflicts of interest and biases when considering alternatives to proposed actions.

While I understand the CEQ's wishes to modernize its NEPA regulations, and commend the enhanced consultation with, and recognition of tribal governments - this proposal has gone too far. I strongly encourage the CEQ to protect the National Environmental Policy Act and to abandon the proposal as issued.

Thank you.

Taylor Luneau



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