

February 11, 2020

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

Mr. Edward A. Boling  
Associate Director for the  
National Environmental Policy  
Act  
Council on Environmental  
Quality  
730 Jackson Place, N.W.  
Washington, DC 20503

Re: Request for 120-day Comment Period on Update to the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA); Docket No. CEQ-2019-0003

Dear Ms. Neumayr and Mr. Boling:

On behalf of the undersigned scientific societies, we respectfully urge you to extend the period during which you will accept public comment on the proposed changes for implementing the procedural provisions of the National Environmental Policy Act (NEPA), Docket No. CEQ-2019-0003, published in the Federal Register on January 10, 2020. At a minimum, a 120-day comment period for a rulemaking of this nature is called for due to the complexity and importance of the proposed rule.

The undersigned scientific societies represent more than 200,000 individuals with diverse areas of expertise in natural resource sciences and work in the private sector, academia, and various tribal, state and federal agencies. We support science-based policy making, and work to advance healthy ecosystems for the critical maintenance of wildlife, fisheries, ecosystem services, and biodiversity.

Although the Administrative Procedure Act (APA; 5 U.S.C. §§ 551-559) does not specify a minimum period for solicitation of comments, the duration of a comment period often varies with the complexity of the proposed rule. The proposed changes to NEPA's implementation guidelines are widely viewed as a regulatory overhaul to this landmark environmental law. This rule represents a significant shift in policy and the development of new language, interpretations, requirements, and procedures that will affect fish, wildlife, and forests. Narrowing the scope of environmental review for federal actions will have far-reaching implications for natural resources, including wildlife, fish, aquatic animals, forests, and ecosystems on which we all depend.

In order to properly understand and meaningfully respond to the major changes contemplated, a minimum of a 120-day comment period is warranted for an appropriate review.

Thank you for considering this request. If you have further questions, please do not hesitate to contact Drue Banta Winters by email at [dwinters@fisheries.org](mailto:d winters@fisheries.org) or telephone at 301-897-8616.

Sincerely,

American Fisheries Society  
American Institute of Biological Sciences  
Association for the Sciences of Limnology and Oceanography  
Coastal and Estuarine Research Federation  
Ecological Society of America  
Freshwater Mollusk Conservation Society  
International Association for Great Lakes Research  
North American Lake Management Society  
Society for Ecological Restoration  
Society for Freshwater Science  
Society of American Foresters  
Society of Wetland Scientists  
The Wildlife Society