



We are writing on behalf of Concerned Scientists @ IU (and its student affiliate organization, Advocates for Science @ IU), a grass-roots, non-partisan community and campus organization comprising over 1200 members—scientists, students, and supporters of science—from the south-central Indiana region. While many of our members are faculty, students or staff at Indiana University, our organization does not officially represent the University. Concerned Scientists @ IU is dedicated to strengthening the essential role of science in public policy and evidence-based decision making.

Our organization strongly opposes the Trump administration's proposal to change how the federal government implements the National Environmental Policy Act (NEPA), an essential pillar of America's environmental protection policy, which is vital to protecting public health and well-being. The revisions proposed by the Council on Environmental Quality would take away necessary environmental protections, removing the responsibility from the governmental and private industry actors for emission of pollutants and environmental degradation. Moreover, the proposed changes would limit communities' awareness of environmental and public health concerns as well as their ability to challenge projects which might lead to negative environmental and health consequences.

More specifically, we oppose the proposed revisions to the rule that would narrow the definition of what projects would constitute a "major federal action" and thus significantly reduce the number of projects that would require and undergo environmental review. We also oppose further revisions that would eliminate the requirement to evaluate cumulative effects as well as to distinguish between direct and indirect effects. Moreover, we do not support revisions that would allow companies to conduct their own environmental review, even with agency supervision; this provision would drastically undermine the independence of the environmental impact assessment process. We find these proposed revisions to be deeply flawed and have the potential to weaken the scientific integrity of the policy-making process by blocking both analysis of the impacts of federal projects on climate change and the impacts of climate change on federal projects. Similarly, these new proposed rules would rush environmental impact assessments, which will limit the quality and completeness of these assessments. Ultimately, the proposed changes will have devastating effects on America's communities and the environment.

This time-honored law is also deeply connected with Indiana University, having been shaped by Lynton Caldwell, one the founding faculty members of IU's School of Public and Environmental Affairs. Dr. Caldwell believed that NEPA laid the necessary framework for sustainable development within our nation's environment. Prior to NEPA, engineers would frequently overlook the environmental and public health impacts of their development projects. Ultimately, the law has allowed communities to examine the objective evidence of environmental impacts of

a proposed project so that a decision can be made in full knowledge of both its costs and its benefits. Thus, the effort to weaken these half-century-old regulations has the potential to threaten many of America's critical natural habitats as well as its citizens' health and well-being.

The members of Concerned Scientists @ IU urge the Council on Environmental Quality (CEQ) to abandon this rulemaking process altogether. We also oppose any other changes to NEPA's implementing procedures that would in any way restrict public input, limit consideration of project alternatives, establish hard deadlines for project approval, or narrow or eliminate federal agencies' obligations to consider a project's climate impacts.