



February 28, 2020

Chair Mary B. Neumayr
Council on Environmental Quality
722 Jackson Place NW
Washington, DC 20503

Submitted electronically

Subject: Comments on the Council on Environmental Quality (CEQ) Update to NEPA Implementing Regulations, Docket No. CEQ-2019-0003

Dear Chair Neumayr,

The Greater Fairbanks Chamber of Commerce supports updates to the National Environmental Policy Act (NEPA) implementing regulations to modernize the Federal environmental review and permitting process. Environmental regulations should minimize cost-prohibitive rules and regulations for businesses and development projects while protecting our air and water resources for future generations.

Responsible development and management of Alaska's natural resources are critical to supporting a growing economy and improved quality of life for Alaskans. Environmental protections such as the NEPA process can – and often do – result in improvements to the design of development projects. Unfortunately, it is becoming increasingly difficult to unlock federal decisions on critical projects. The investors can be lined up, the architectural design and engineering can be readily completed, the construction equipment and labor made available, but those plans may be mothballed for years and sometimes decades due to the ever thickening layer of process that has amassed on project applicants who seek federal approvals or permits under the National Environmental Policy Act (NEPA).

Since NEPA was last comprehensively updated in the late 1970s, the time it takes to complete environmental reviews has increased. When it takes longer to go through the federal approval process than it does to actually build a project, it is an indication that the NEPA process is broken. Of the 170 projects that were reviewed by the U.S. Department of Transportation

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from 2010 to 2017 that required an environmental impact statement (EIS), half took more than six years to complete.

There are many recent examples of projects in Alaska which have faced excessive delays due to environmental impact review. A few of them include:

- Donlin Gold mine – 5+ years to complete
- Angoon Airport – 6+ years to complete
- Alaska Railroad Tanana River Bridge – 4 years to complete
- Sterling Highway MP 45-60 – 18 years to complete

In addition to our bridges, our railways, airways and waterways — our energy and industrial facilities, telecommunications networks, and other public assets — are vital to economic activity. While we fully support the fundamental goals of NEPA to appropriately consider the potential environmental impacts of certain federal actions, securing timely approval for projects and land management decisions is hampering economic activity and becoming increasingly expensive to permit.

For these reasons, we support modernization of the NEPA implementing regulations and efforts to ensure a more efficient, predictable, and effective approach to environmental permitting of infrastructure and development projects.

The Greater Fairbanks Chamber of Commerce represents over 700 business members throughout Interior Alaska. We work to advocate for the best business environment, promote economic strength and growth for interior Alaska, and to develop the resources and networks enterprising people use to share knowledge.

Thank you for the opportunity to comment on these changes.

Respectfully,

A handwritten signature in black ink that reads "Marisa Sharrah".

Marisa Sharrah
President/CEO

A handwritten signature in black ink that reads "Sabrina Binkley".

Sabrina Binkley
Board Chair