



Testimony Delivered By William Allison
On Behalf Of The Independent Petroleum Association of America
To The Council on Environmental Quality (CEQ)
At CEQ's Denver, CO Public Hearing
On the Council's Proposal to Update the Regulations Implementing the
Procedural Provisions of NEPA
February 11, 2020

Good afternoon.

My name is Will Allison and I'm here representing the Independent Petroleum Association of America.

Thank you to the Council on Environmental Quality for holding this public hearing.

The thousands of oil and natural gas operators represented by the IPAA commend the Trump Administration for proposing this much-needed reform of the National Environmental Policy Act.

NEPA underwent its last MAJOR update in 1978 and it's well past time for a modernization of the law to help spur economic development, innovation, and improved environmental protections.

Unfortunately, opponents of this proposed reform say its only intention is to weaken environmental protections.

But the reality is that NEPA has become so outdated and burdensome that it actually makes environmental outcomes worse.

Directives from past presidents and regulatory modifications have made NEPA far more complicated than the original intent of the law.

It has now become so unworkable that critical energy and infrastructure projects are being delayed, and that's stalling the environmental benefits they will bring.

Through modernization of NEPA, we can cut emissions through more efficient energy production and transmission, and the construction of new roads and bridges that reduce traffic congestion.

Additionally, this proposal will not alter the protections in the Clean Air Act or Clean Water Act.

Under the current NEPA policy, the average Environmental Impact Statement (EIS) takes five years to complete. Some NEPA reviews take even longer.

Under the proposed reform, the goal is to shorten that process to two years.

That can be accomplished in several ways including cutting down on abuses of the appeal system.

Federal agencies are dealing with a relentless onslaught of NEPA court challenges that aren't intended to better protect the environment but are only meant to block new projects.

It's a terribly inefficient process that leads to federal land managers seeking to create "appeal proof" NEPA documents instead of working with stakeholders to implement reasonable environmental and conservation efforts.

Furthermore, a lack of coordination among federal agencies leads to delays and confusion.

While agencies such as the Bureau of Land Management and the U.S. Forest Service claim to engage in a collaborative decision-making process, the lack of coordination among federal land management agencies when dealing with NEPA causes significant delays and confusion. Rather than achieving successful outcomes, these schemes prevent the agencies from making timely decisions.

The Trump Administration's proposal to streamline the review process and designate a lead agency for NEPA review is a positive step forward.

The IPAA welcomes these proposed changes and is ready to work with the federal government to find solutions that improve our infrastructure and better protect the environment.

Thank you.