

THE BOMBPLEX: Tips for Commenting on a NEPA Document

Overview

Because there is no formal enforcement process to ensure federal agency compliance with the National Environmental Policy Act (NEPA), the enforcement of NEPA has come primarily from concerned members of the public and public interest groups. The first, and most important, step in that process involves the submission of comments by the public. There are a number of reasons to comment on NEPA documents:

- to influence federal agencies to minimize environmental impacts,
- to convince the lead agency to deny the proposed action,
- to improve the documents by adding different perspectives or additional information, and
- to lay the groundwork for future judicial challenges.

Individuals reviewing NEPA documents should actively and diligently participate in all steps of the NEPA process.

Commenting at a public hearing

Your oral comments should be a summary of your major concerns, emphasizing and explaining the most important points. It is a good idea to write down what you plan to say. You should also submit comments in written form. At the public hearing, you may hear others' comments and want to incorporate them into your written comments.

Introduce yourself: State your name and what special relationship or expertise you bring to the subject (local resident, worked in a similar field, grew up in the area, read news reports on the issue, etc.).

Introduce your group: If you're affiliated with a group, state your group's name and purpose.

State the problem: In this case, talk about the Department of Energy (DOE), the Bombplex (the "Complex Transformation" plan), nuclear weapons proliferation, economic waste, environmental harm, etc.

State the solution: Discuss what you envision as a better outcome, including alternatives to the proposed action or possible mitigation measures.

Submitting written comments

There are no special forms or formats for submitting written comments under NEPA. However, the most effective comments usually follow the broad principles outlined below.

Preparation and organization: Begin your work well before the comment deadline by reading the NEPA document or the Executive Summary. Feel free to contact Tri-Valley CAREs if you have any questions or need additional information.

Format: Comments may be typed or handwritten, but handwritten comments must be legible. Mailed comments should be sent to the appropriate address, e-mail, or fax number before the comment deadline. Submissions should include the comment submitter's name, address, and telephone number; anonymous submissions will not be considered.

Content and style: Identify the document reviewed and clearly define the issues upon which you would like to comment. Indicate if you are for or against the proposed action or some part of it and why. If you disagree with the proposed action, suggest an alternative and how that alternative might meet the same objective. To the extent possible, personalize your comments and underline or highlight any important points. You may also include any copies of articles or provide a list of references that supports your comments.

Tri-Valley CAREs

2582 Old First Street, Livermore, CA 94551 • (925) 443-7148 • Fax (925) 443-0177

<http://www.trivalleycares.org/>