



NATIONAL
ASSOCIATION for
OLMSTED
PARKS

“... advances Olmsted’s principles and legacy of irreplaceable parks and landscapes that revitalize communities and enrich people’s lives.”

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March 10, 2020

Re: Docket #CEQ-2019-0003 - Comments of the National Association for Olmsted Parks

The National Association for Olmsted Parks opposes proposed changes to the National Environmental Policy Act’s regulations, as outlined more fully below. NEPA standards have, over time, helped protect “important historic, cultural, and natural aspects of our national heritage” impacted by federal undertakings. The proposed revisions would seriously harm that protection.

We do indeed support good ways to ensure a more efficient and timely regulatory review process. However, limiting the number of projects under review, ignoring long-term impacts, and diminishing accountability to the public are not appropriate responses. The CEQ’s proposed revisions would:

- Reduce the number of projects subject to NEPA review, making it more likely that federal infrastructure projects could adversely impact important cultural and natural resources.
- Limit the consideration of indirect, cumulative, and long-term effects, which are often greater than immediate or direct effects of a project on important cultural resources. The express provisions of NEPA require consideration of all consequences, and regulations may not undo what is set forth in statute.
- Limit the analysis of alternatives which could minimize the adverse effects of projects on natural and cultural resources.
- Have the federal government serve as the sole arbiter on many of its own decisions, removing urgent oversight and input by states, tribal entities, and the public – and the accountability they provide.

The need for new infrastructure must be balanced against the human need for greenspace and nature in an urbanized society. It must, in turn, be weighed against the value of retaining historic and cultural treasures which provide community and tie all of us to a common past.

Over time, NEPA has provided a bulwark against the misguided destruction of natural and cultural treasures by projects whose impacts are often long-term and cumulative. The Act and regulations – working in tandem with Section 106 review processes set forth in the National Historic Preservation

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Act --have rightly ensured that historic, ecological and aesthetic values be considered before priceless environmental and cultural resources are impaired or destroyed.

From long experience, we know that parks and open spaces are regularly seen as areas "available" for development, rather than extraordinary and valuable public amenities worthy of protection. The modifications proposed would profoundly threaten that protection. Accordingly, we respectfully request that the CEQ go back the drawing board.



Anne Neal Petri
President and CEO

For 40 years, the National Association for Olmsted Parks has been dedicated to advancing Olmsted principles and the legacy of irreplaceable parks and landscapes that revitalize communities and enrich people's lives. www.naop.org.