



**The Wildlife Society**  
**Western Section**  
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March 27, 2025

Council on Environmental Quality  
Docket Number CEQ-2025-0002  
730 Jackson Place NW  
Washington, DC 20503

**Subject:** Oppose Removal of National Environmental Policy Act Implementing Regulations; Docket Number CEQ-2025-0002

### **Summary of Comments**

On behalf of the members of the Western Section of The Wildlife Society, the Conservation Affairs Committee submits the following comments **OPPOSING** the Removal of National Environmental Policy Act Implementing Regulations (Docket Number CEQ-2025-0002).

### **The Basis for Comments by the Western Section of The Wildlife Society**

The Wildlife Society (TWS) was founded in 1937 and is a non-profit professional society representing wildlife biologists, managers, and educators dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

The Western Section of TWS represents over 1,200 wildlife professionals, students, and retirees in Nevada, California, Hawaii, and Guam. Our members have extensive experience in environmental compliance, wildlife population research and monitoring, species- and community-specific wildlife surveys, evaluating sensitive species listings, and brokering mitigation agreements and compliance. Our collective professional training and experience provide a strong and unique basis for providing the following comments related to the National Environmental Policy Act (NEPA) and the Federal Notice to remove the Council on Environmental Quality's (CEQ) implementing regulations (Docket Number CEQ-2025-0002).

### **Opposition to Removal of NEPA Implementing Regulations**

Passed in 1969 in response to increasing public concern about the effects of human activity on the environment, NEPA established a procedural framework obligating all federal agencies to consider environmental impacts prior to taking any "major Federal

actions significantly affecting the quality of the human environment.” Rather than being prescriptive on substantive standards for environmental protection, NEPA focuses on ensuring federal agencies thoroughly consider the possible environmental effects of their actions and disclose these effects to the public. President Carter's Executive Order 11991 directs CEQ to “issue regulations to federal agencies for the implementation of the procedural provisions of the Act.” The CEQ regulations instructed federal agencies on *how* to implement NEPA, providing consistency across the Federal government. In the absence of these implementing regulations, each agency must now individually determine how to implement NEPA and develop independent processes. This will require time, during which projects may not be approved, and require federal employees to conduct this duplicative work.

The original purpose of NEPA, in addition to establishing the CEQ, includes “promot[ing] efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; [and to] enrich the understanding of the ecological systems and natural resources important to the Nation” (Section 2 [42 USC §4321]). The context of the decisions with respect to the original purpose of NEPA must be preserved. It is essential that NEPA’s core tenet to ensure proposed federal actions thoroughly consider and disclose possible environmental impacts remains intact. There is an economic and cultural benefit to NEPA; it is more than just environmental protection.

The stated purpose for the Removal of the National Environmental Policy Act Implementing Regulations (Docket Number CEQ-2025-0002) is to expedite critical project approvals, which would include streamlining the environmental review process. However, the CEQ, and the regulations it issued, were established in part to address this specific need. Therefore, removing the implementing regulations, which will result in decentralizing the implementation of NEPA, will have the opposite effect. These actions will result in inconsistent interpretation and application of NEPA across agencies, which will lead to project delays, especially when cross-agency collaboration is required, leaving more projects susceptible to litigation, which will pause project implementation indefinitely as they are awaiting regulatory and legal decisions. These costly and lengthy delays will impact Executive Orders, such as the Immediate Expansion of American Timber Production (EO 14225, 90 FR 11365).

CEQ’s existing NEPA regulations ensure that federal agencies are consistent in their implementation of NEPA and that they fully evaluate the environmental impacts of their actions where those actions risk having the most impact—in particular, where unique geographic areas or threatened or endangered species are present, where the environmental effects of an action are controversial or poorly understood, or where there is potential for significant cumulative effects (see 40 C.F.R. § 1508.25). CEQ’s critical role has been to ensure that actions with potential effects to unique geographic areas or imperiled species, or cumulative effects, or whose effects are controversial or poorly understood, receive full scrutiny during environmental review. This approach must be retained; CEQ should not eliminate the implementing regulations.

The CEQ, and their implementing regulations, were established to meet Congress' original intent of NEPA, which was to "not intentionally initiate actions which will do irreparable damage to the air, land, and water". If the implementing regulations are to be removed, what would replace them? NEPA must still be implemented.

Thank you for the opportunity to provide comments *opposing* the Removal of National Environmental Policy Act Implementing Regulations (Docket number CEQ-2025-0002). We appreciate your consideration of these comments. Please direct questions or requests for additional information regarding The Western Section or our expertise relating to NEPA to The Western Section Conservation Affairs Committee at the letterhead address or [conservation@tws-west.org](mailto:conservation@tws-west.org).

Sincerely,

Conservation Affairs Committee  
The Western Section of The Wildlife Society