



The Honorable Mary B. Neumayr
Council on Environmental Quality
1200 Pennsylvania Avenue NW
Washington, DC 20460

Attention: CEQ-2019-0003-0001

Proposed Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act

Dear Ms. Neumayr:

The White House Council on Environmental Quality's proposed crippling of the National Environmental Policy Act (NEPA) will harm business by significantly intensifying the climate crisis, impacting air, water and wildlife. Contrary to claims from the administration and the Chamber of Commerce that the rule change will be good for the economy; it will have negative consequences for businesses across every sector.

Overwhelmingly, scientists agree that a man-made climate crisis is upon us, yet this proposed change will eliminate the need for the NEPA permitting process to consider a project's potential contributions to worsening that crisis or consider a project's resiliency in the face of more extreme weather we already experience due to climate change. Neither of those positions make long-term business sense. Other impacts from the climate crisis, such as rising oceans and disruptions to supply chains, pose existential threats to our entire economy, indeed to human life itself. Unchecked, the climate crisis will impact GDP by \$44 trillion in just the next 40 years, while Brookings says by 2100, climate impacts will slash global GDP by more than 20 percent.

This proposed gutting of NEPA will greatly increase the risk of oil spills and other risks to our nation's waterways. Clean waterways are vital for sectors like breweries, the seafood industry and the hospitality industry. The craft brewing industry contributed \$76.2 billion to the U.S. economy in 2017, more than 500,000 jobs, and depends heavily on clean water to create a high-quality product for its consumers. Consumers spend \$887 billion annually on outdoor recreation overall, and nearly \$175 billion on fishing, kayaking, rafting, canoeing, scuba diving and other water sports alone – all of which thrives on a visibly healthy water supply. Further, clean water is important for the real estate industry – home values can erode by as much as \$85,000 each on land near water with high nutrient pollution levels. A clean water source allows each of these industries to provide safe products and activities for their customers to enjoy, while also reducing the cost of water treatment for each sector.

Weakening NEPA will also threaten wildlife and other biodiversity that lie in the path of large infrastructure development. Loss of wildlife can force outdoor tourism and sporting companies to shut

their doors. For example, bird watchers spend nearly \$41 billion annually on trips and in 2011 alone, 666,000 jobs were created as a result of bird watching expenditures. The proposed changes to NEPA are a danger to the remaining habitats of the already dwindling bird populations. A study released in 2019 found the number of birds in the United States and Canada has declined by 3 billion, or 29 percent, over the past half-century. Overall, evidence shows that habitat conservation generates more economic benefits than does habitat conversion.

Data shows that, for the most part, despite the claims of the administration, NEPA does not impose unreasonable delays or obstructions on infrastructure projects. For instance, more than 192,000 projects, worth about \$300 billion, efficiently went through the NEPA process as part of the 2009 American Recovery and Reinvestment Act.

There is potential to reform aspects of NEPA in ways that could benefit sustainable businesses, without further harming our planet. Certain clarifications to the law could, for example, help streamline the development of renewable energy infrastructure that could actually mitigate against climate change. However, the current proposal goes too far, and the potential costs will outweigh the benefits.

On behalf of the American Sustainable Business Council's membership, which represents more than 250,000 businesses in all sectors, we ask that you withdraw your proposal to weaken NEPA and seek input on future environmental policy changes from the rapidly growing responsible and sustainable business community.

Sincerely,

A handwritten signature in black ink that reads "David". The letter "D" is large and stylized, with a loop at the top. The "a" and "v" are smaller and more straightforward.

David Levine
President
American Sustainable Business Council
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