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Secretary Tom Ridge
Department of Homeland Security
Environmental Planning, Office of Safety and Environment
Washington, D.C. 20528

Dear Secretary Ridge and Homeland Security Staff,

Proposed Management Directive 5100.1, Environmental Planning Program 69 Fed. Reg. 33044

The Department of Homeland Security's proposed directive regarding implementation of the National Environmental Policy Act (NEPA) would erode the environmental protection policies as well as curtail public participation and disclosure provisions currently required by NEPA. Changes to the directive are needed to ensure citizens and policymakers are fully informed of potential health and safety issues that could affect their quality of life as well as viability of wildlife habitat. Please strike the language that would allow for the broad use of categorical exclusions and eliminate the provision that would allow for the withholding of NEPA documents as classified or protected information.

Categorical exclusions (CEs) under NEPA are for activities that by their nature do not impact the environment. DHS's proposal, however, would give CE status to activities that can have significant adverse effects on the environment and communities, such as waste disposal; emergency response training; aircraft operations; barriers and fences; remote video surveillance; and logging. Public review of these and other activities should occur before these activities proceed in order to determine their potential adverse impacts. They should not, as DHS proposes, be removed completely from the review and public participation that NEPA requires.

Although I support the mission of the Department of Homeland Security, the breadth of the undefined categories of information that would be withheld from public view is a tremendous expansion of the current policy that allows only classified information to be withheld from NEPA documents, and is unwarranted for protecting national security. The proposal should be more specific so as to minimize withheld information and maximize transparency.

The proposal goes well beyond what is necessary to protect national security and risks destroying the very democratic ideals that the Department of Homeland Security was created to protect. I urge you to limit the use of categorical exclusions and the withholding of information as narrowly as possible.

Sincerely,



Brian Kraby