

COMMITTEE TO BRIDGE THE GAP

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Environmental Planning
Office of Safety and Environment
Management Directorate
Department of Homeland Security
Washington, D.C. 20528

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*Re: Comments on Department of Homeland Security draft directive
containing policy and procedures for implementing the National Environmental Policy Act of
1969 (NEPA)*

To Whom It May Concern:

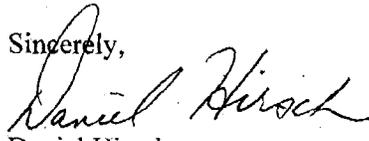
The Committee to Bridge the Gap is a thirty-four-year-old nonprofit public policy organization based in California. For a quarter of a century we have been involved in environmental issues associated with contamination from Department of Energy facilities, as well as other important nuclear policy questions.

We are concerned with some provisions of the Department of Homeland Security draft directive for policy and procedures for implementing NEPA. The directive seems overbroad, with insufficient protections to assure governmental compliance with NEPA. While there are some homeland security matters for which secrecy is obviously necessary, there is a great concern in this country over the potential that some decisionmakers, now or in the future, may hide behind the mantle of homeland security in order to diminish important longstanding public protections regarding government decisionmaking and the transparency necessary for democracy to fully function. The potential for misuse of this directive, if finalized, to shield from public scrutiny matters involving governmental compliance with the laws of the land is significant.

We join in the detailed comments made by Tri-Valley CARES, and urge the Department to rethink its proposal. The greater risk to our country may be from insufficiently-thought-out responses to the threat of terrorism that could end up having the effect of weakening the fundamental underpinnings of our democracy – government being accountable to the public in its decisionmaking.

Thank you for the opportunity to comment on this draft directive.

Sincerely,


Daniel Hirsch
President