

The Edmonds Institute

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August 16, 2004

Environmental Planning
Office of Safety and Environment
Management Directorate
Department of Homeland Security
Washington, DC 20528
FAX #202-772-9749

Re: Proposed Management Directive 5100.1, Environmental Planning
Program [69 Fed. Reg. 33044 (June 14, 2004)]

To Whom It May Concern:

The Edmonds Institute, a public interest, 501(c)(3) non-profit organization concerned with issues related to environment and technology, submits the following comment on Proposed Management Directive 5100.1. In particular, we share our concerns with the Directive's proposed procedures to implement the National Environmental Policy Act (NEPA).

The Institute holds the environmental review and public participation provided by NEPA to be essential to the quality of decisions made by government and to the confidence of the public in that quality. Unfortunately, we find that the Proposed Management Directive unduly limits public participation and access to information and thus is more likely to damage public faith in government than to protect public security, health or environment. With that recognition, we ask the Department to revise its proposals.

The Institute has been privileged to read the submission of the Natural Resources Defense Council regarding the Proposed Management Directive and we agree with its proposals for the deletion and restriction ("narrowing") of many of the categorical exclusions delineated in the Management Directive, as well as with its comments on classified or protected information.

The Institute does not wish to burden the Department with repetition of arguments and details that can be read in the NRDC submission. We wish only to add our voice to those who request that you not be tempted to enact measures and programs that may harm that which we all seek to protect.

In order for the public to support and give credence to measures promulgated for homeland security, those measures should not induce skepticism, exacerbate distrust, or compromise the well-tested checks and balances upon which we have come to rely for a vibrant democracy and long-term

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environmental health and security. To encourage the Department to avoid these pitfalls, we repeat the request first made in the NRDC submission and ask that the exclusions from environmental review and prohibitions on disclosure of information be more clearly and carefully defined and much more narrowly delineated.

We hope that we may look forward to a revised Management Directive and we thank you in advance for your attention to our comments.

Sincerely,

A handwritten signature in black ink that reads "Beth Burrows". The signature is written in a cursive, flowing style.

Beth Burrows
President/Director
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