

ADMIN-S&E

From: Valerie Heinonen
Sent: Wednesday, August 04, 2004 3:17 PM
To: ADMIN-S&E
Subject: National Environmental Policy Act

August 3, 2004

Re: National Environmental Policy Act
Exemptions and Exclusions
Bush Administration Proposal

The Bush Administration proposed directives to implement the National Environmental Policy Act (NEPA) should be reviewed carefully before being accepted and implemented by the Department of Homeland Security.

No agency, including the Coast Guard, Border Patrol, Federal Emergency Management Administration, Department of Defense and all other government agencies, should be given categorical exemptions from federal environmental regulations. Furthermore, all proposals and all decisions impacting the environment must be submitted for public comment.

It is a well-known and well-publicized fact that there already are many sectors of our country e.g. Rocky Flats, Paducah, Oak Ridge, suffering environmental devastation and evidencing severe human health tragedy as a result of environmental exemptions or unenforced laws and regulations.

One example is the waste from production of nuclear and other weapons/weapons systems whether the production is under a federal agency such as the Energy Department or a publicly held corporation, which has exemptions written into its Department of Defense contracts.

The pretext of "national security" has been used for many generations with little or no examination of long-term consequences. The 9/11 disaster and the war on terrorism must not be used to cover poor security decisions, cause human health problems, destroy the natural environment or prevent public comment.

I am submitting these comments on behalf of four Roman Catholic institutional investors, the Mercy Investment Program, the Sisters of Mercy Regional Community of Detroit, the Dominican Sisters of Hope and the Ursuline Sisters of Tildonk-U.S. Province.

These institutions, as shareholders, have addressed corporate management on the environmental impact of manufacturing processes e.g. General Electric and PCBs; the production of energy (oil, coal, nuclear) and the production and testing of military equipment. We have urged responsible use of chemicals and disposal of hazardous wastes. We have more than thirty years of experience in negotiating formation and implementation of accountable policies and procedures.

While policies are not perfect, today there are few corporations which do not understand the need for stewardship of natural resources. Indeed, the majority of leading U.S. corporations and banks have well-developed policies, procedures and processes for evaluation. The Federal Government must take equal or greater responsibility. In our opinion, the Federal Government should take leadership on the issues of environmental and resource stewardship.

Thank you.

Valerie Heinonen, o.s.u.