

Practitioner Perspectives on NEPA Implementation and Permitting Reform

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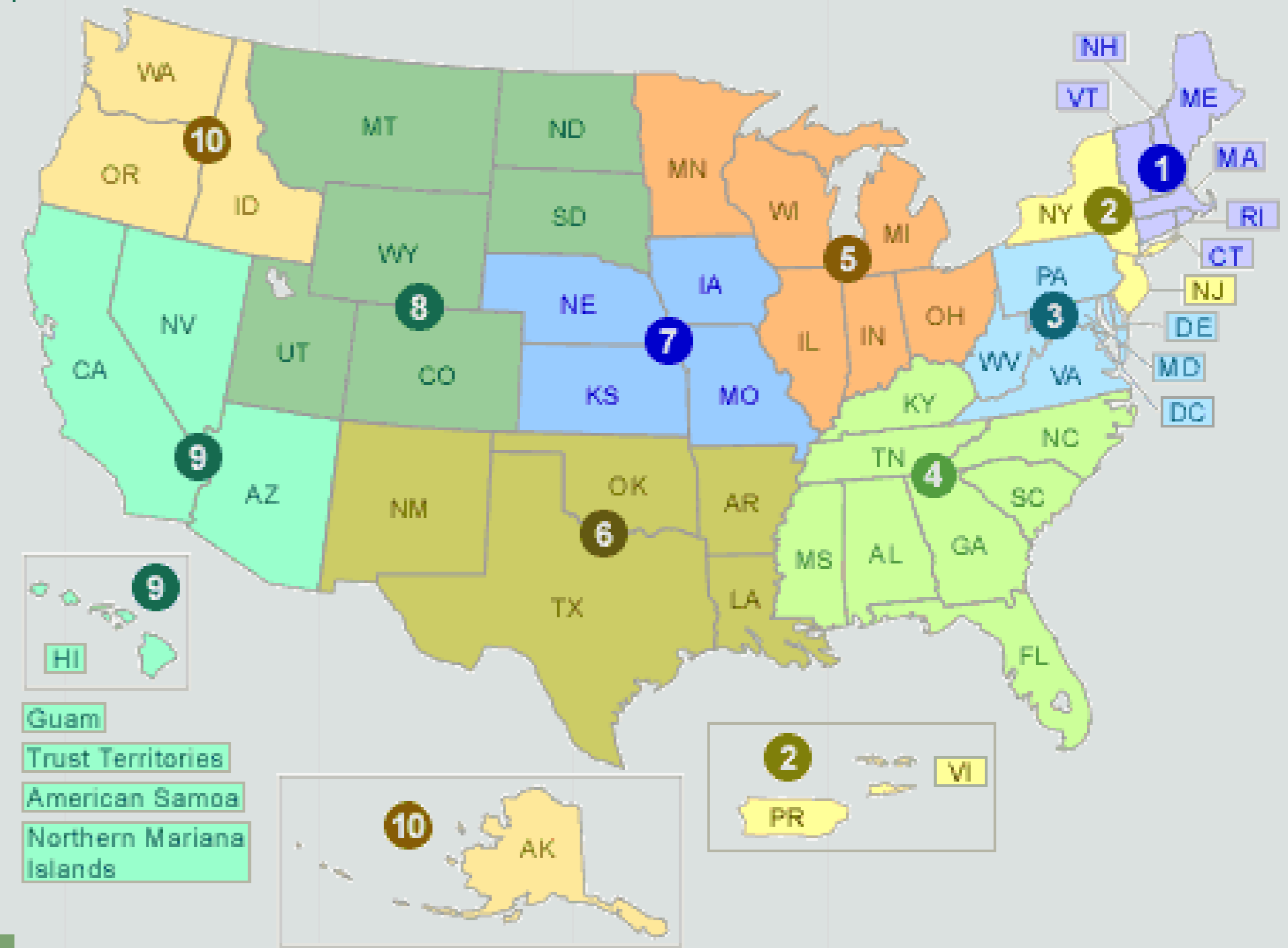
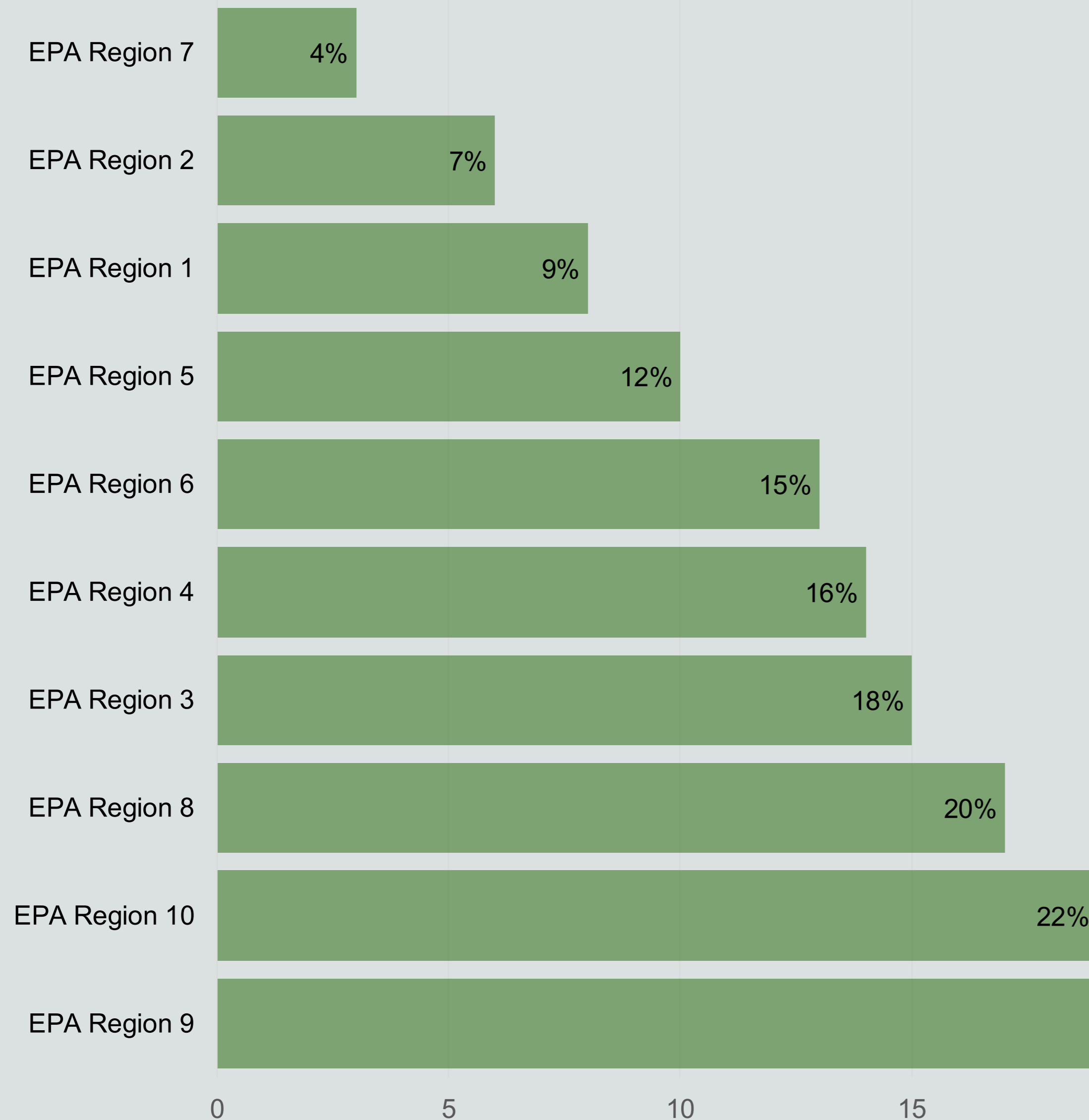
Wallace Stegner Center for Land,
Resources and the Environment

Who Responded?

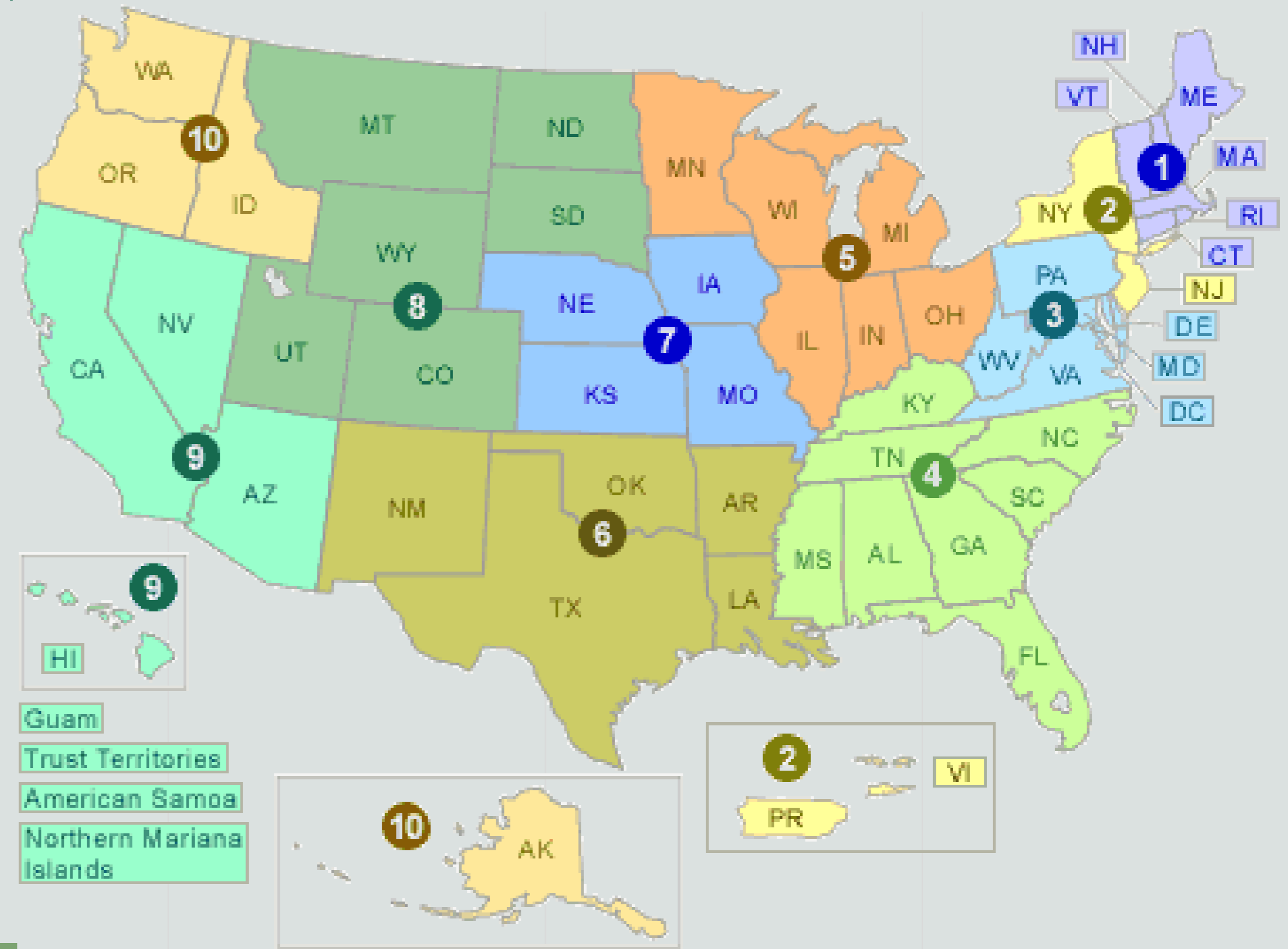
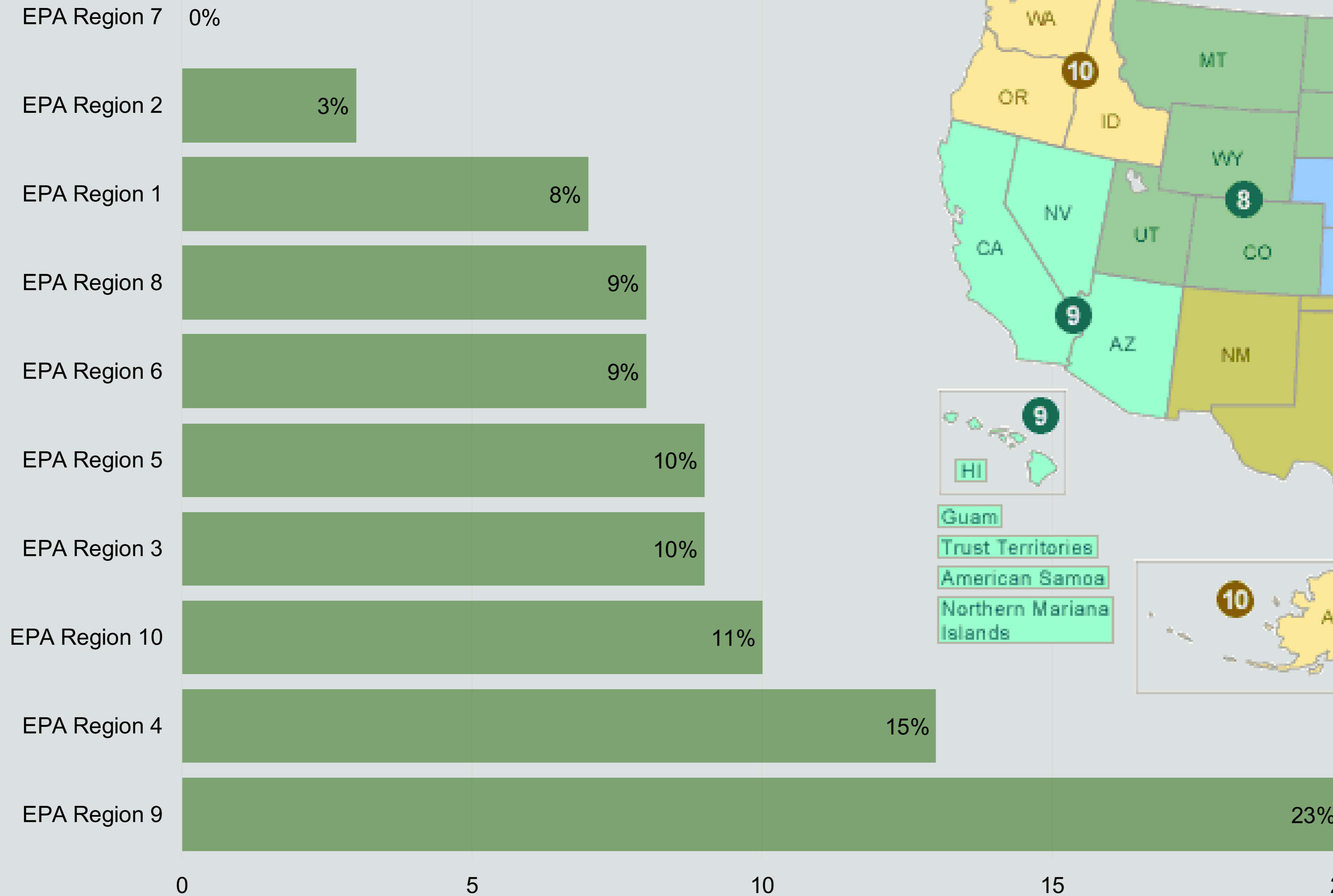


National
Association of
Environmental
Professionals

Where Respondents Work



Where Respondents Live



What Respondents Do

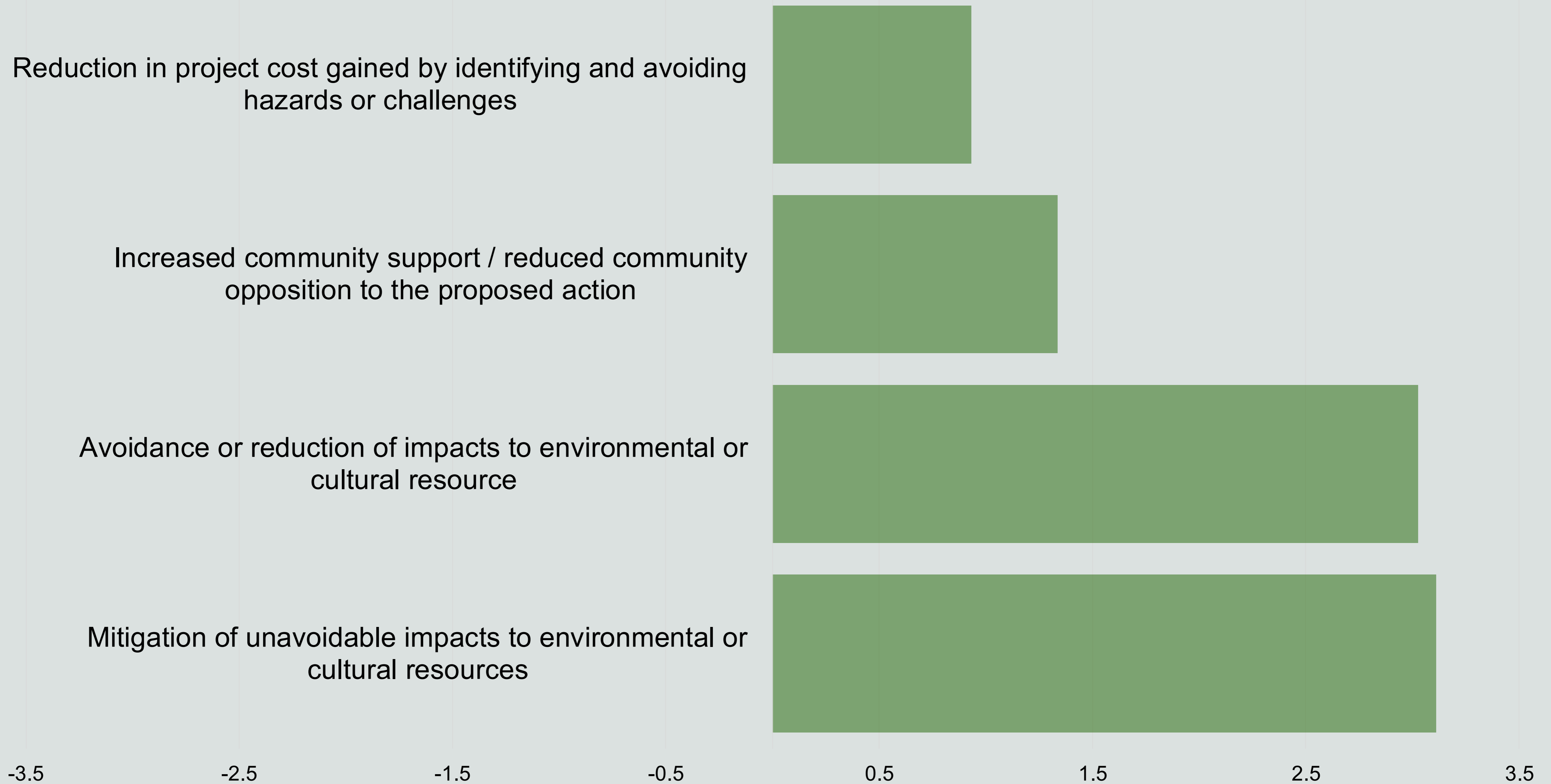
- 64% are environmental consultants; 24% work in federal or state government.
- 35% are project managers; 33% are scientists.

Respondents Experience

- **Experienced:** 33% have 25+ years of experience; 18% have 20-25 years of experience; only 4% have less than 3 years of experience.
- **Well Educated:** 100% have a 4-year degree; 70% have an advanced degree.
- **Common Areas of Experience:** NEPA (98%); Transportation (54%); Endangered Species (33%), Clean Water Act (26%).

Respondent Opinions

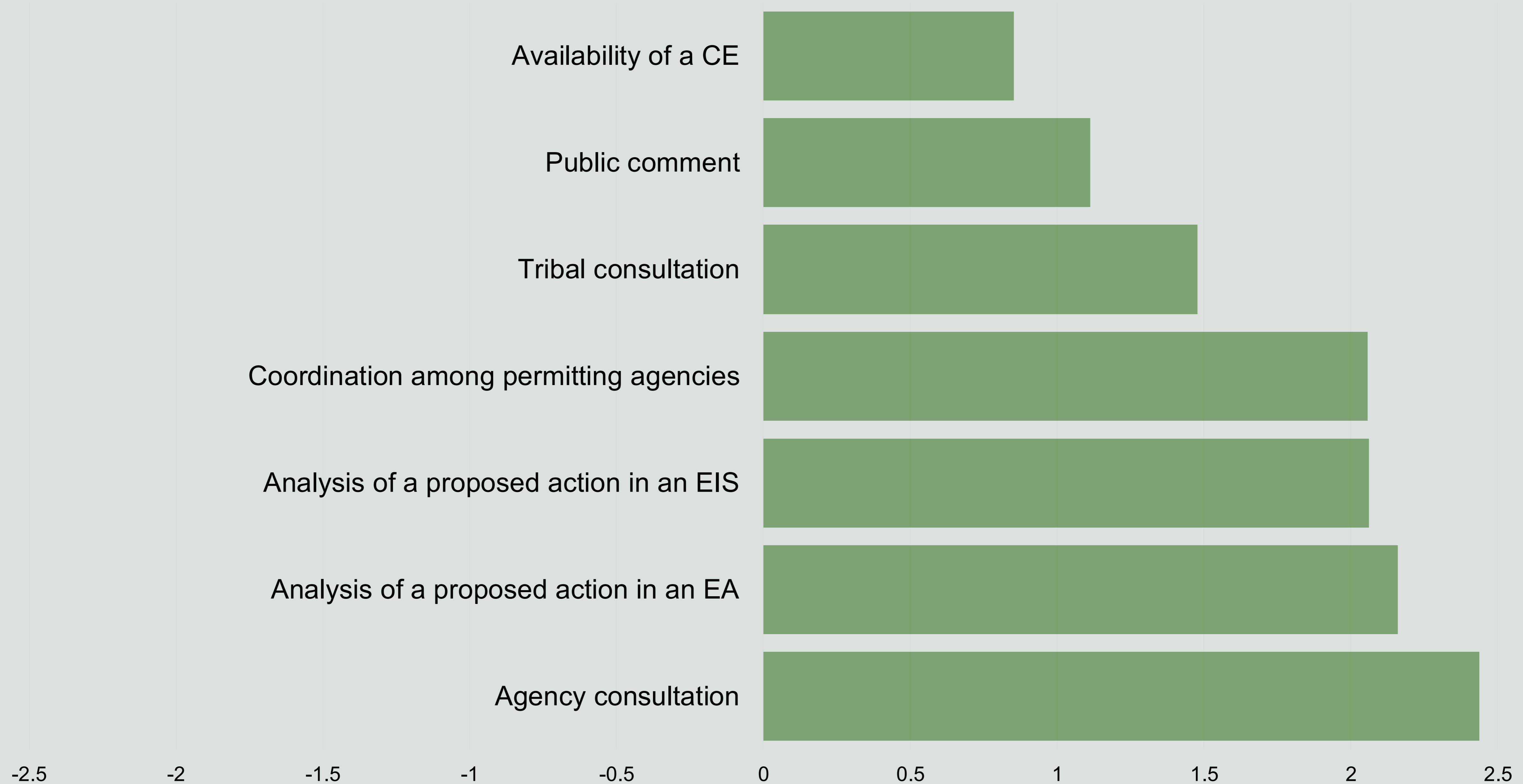
Prior to 2025 how likely was each of the following to occur as a RESULT of the NEPA process?



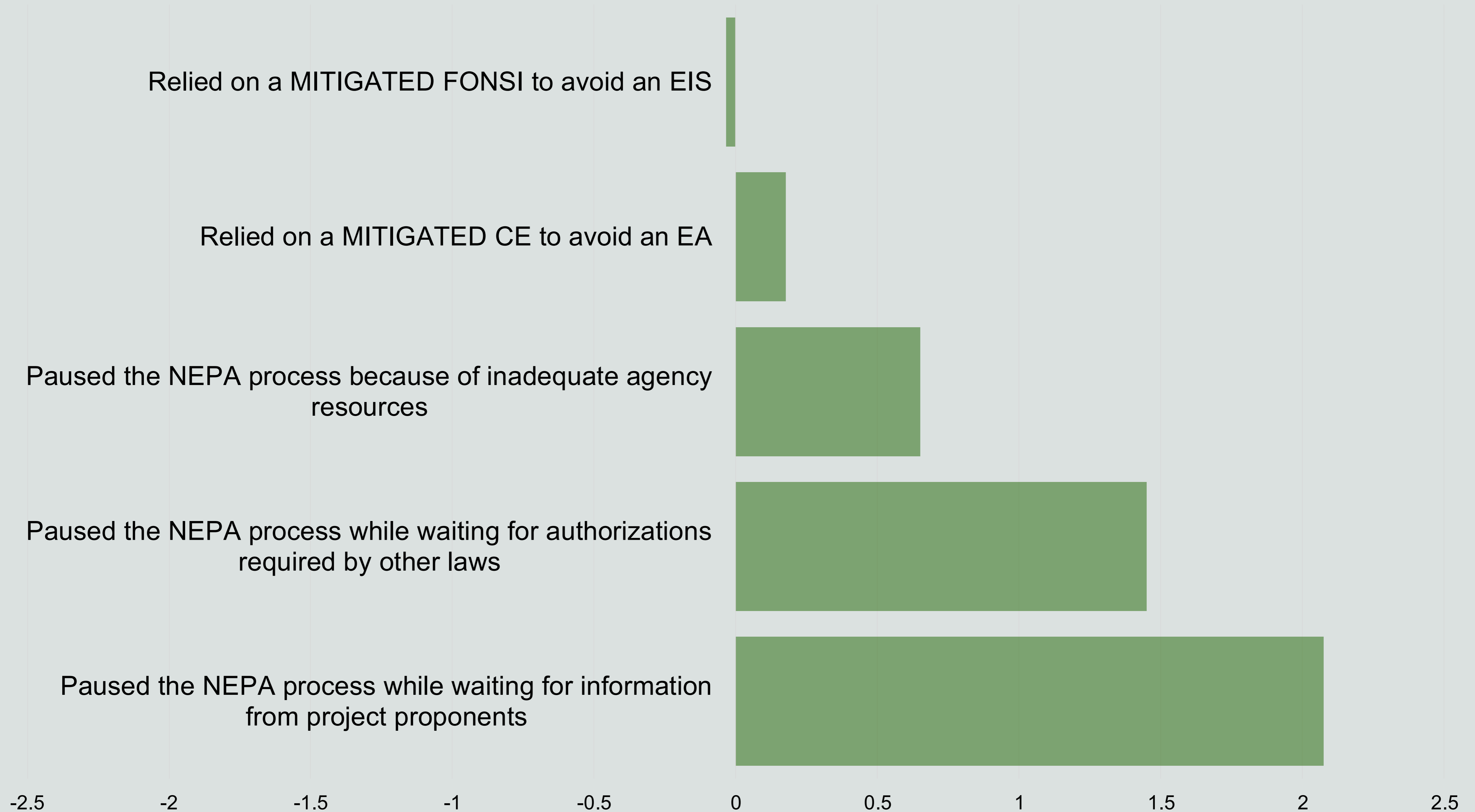
Based on your experience, prior to 2025 how did the following factors impact the TIMING of NEPA compliance?



Prior to 2025 to what degree did the following factors tend to REDUCE adverse IMPACTS?



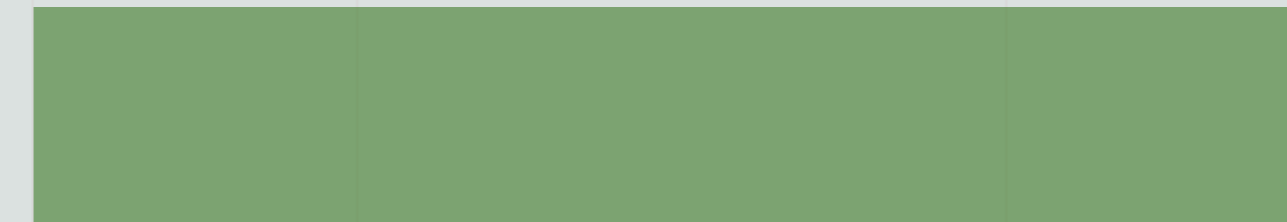
How often have you...



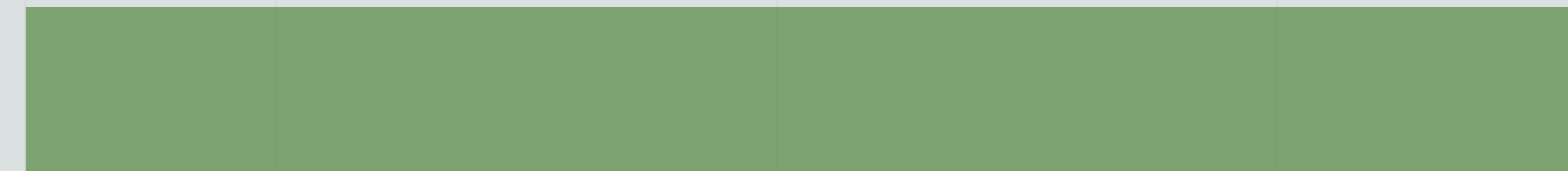
Recent Changes to NEPA Practice

How familiar are you with following?

How comfortable are you instructing or supervising others on NEPA implementation?



Recent COURT DECISIONS interpreting NEPA's requirements



Recent changes to NEPA's implementing REGULATIONS

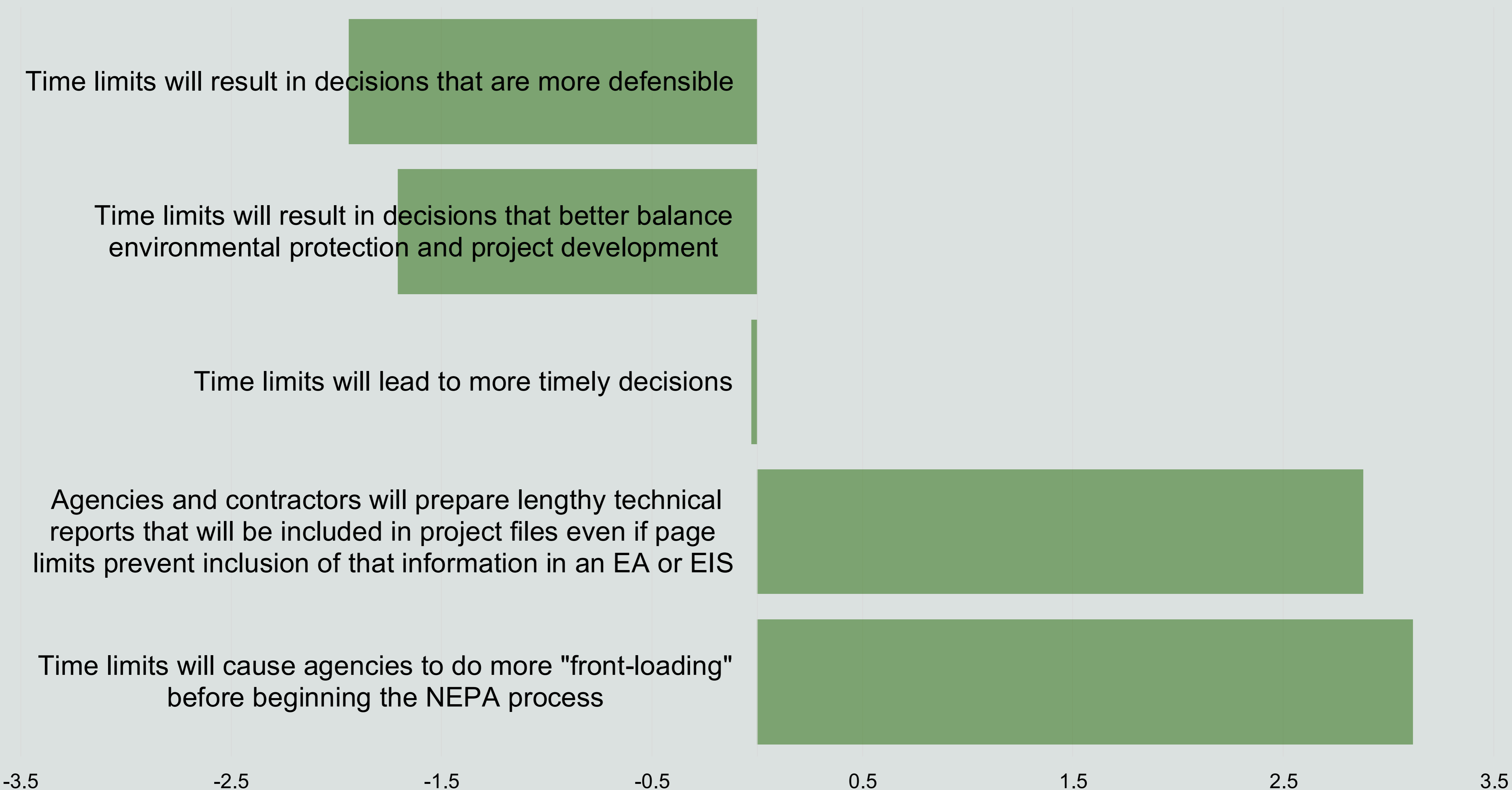


Recent LEGISLATIVE changes to NEPA

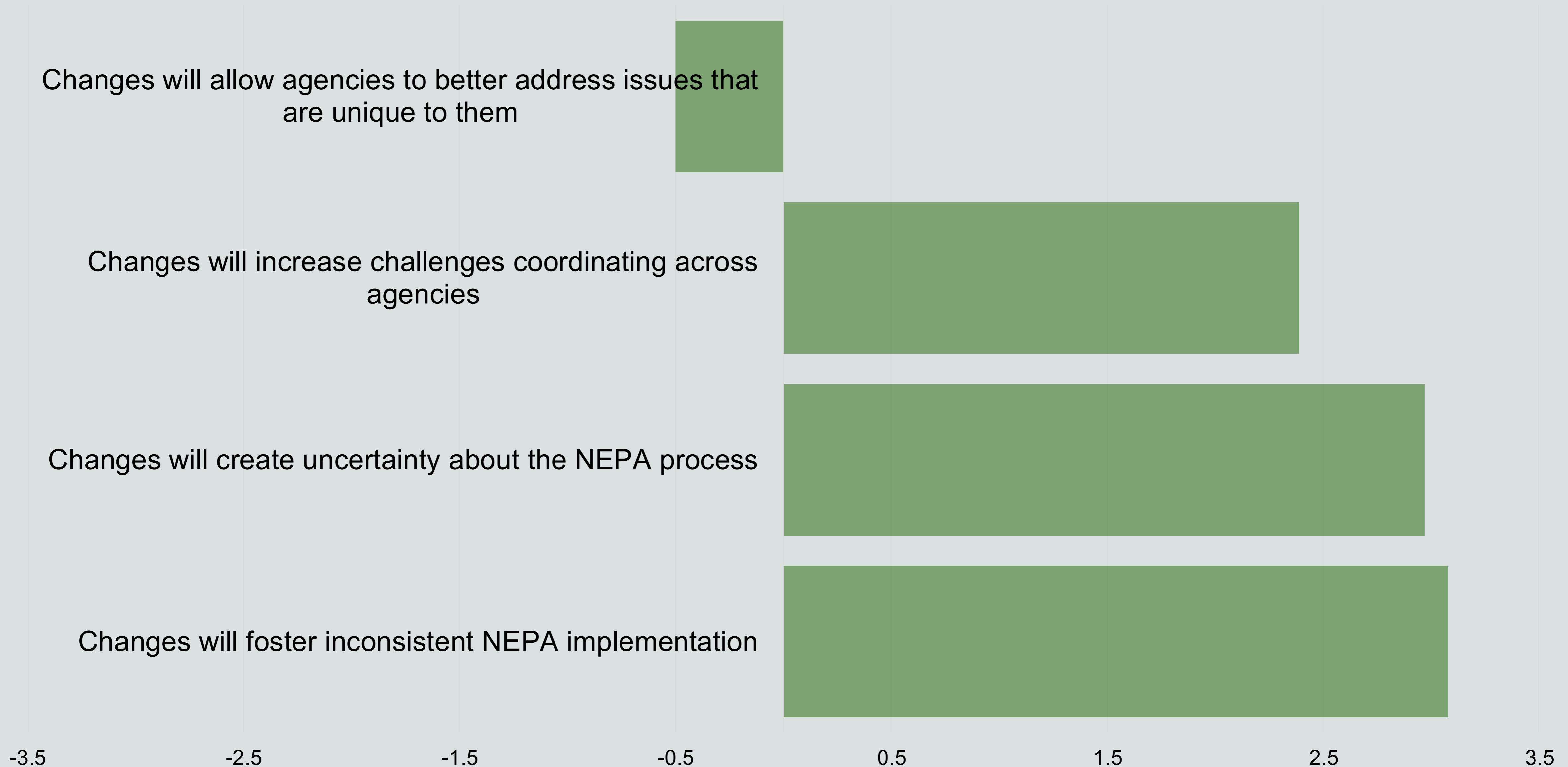


-3.5 -2.5 -1.5 -0.5 0.5 1.5 2.5 3.5

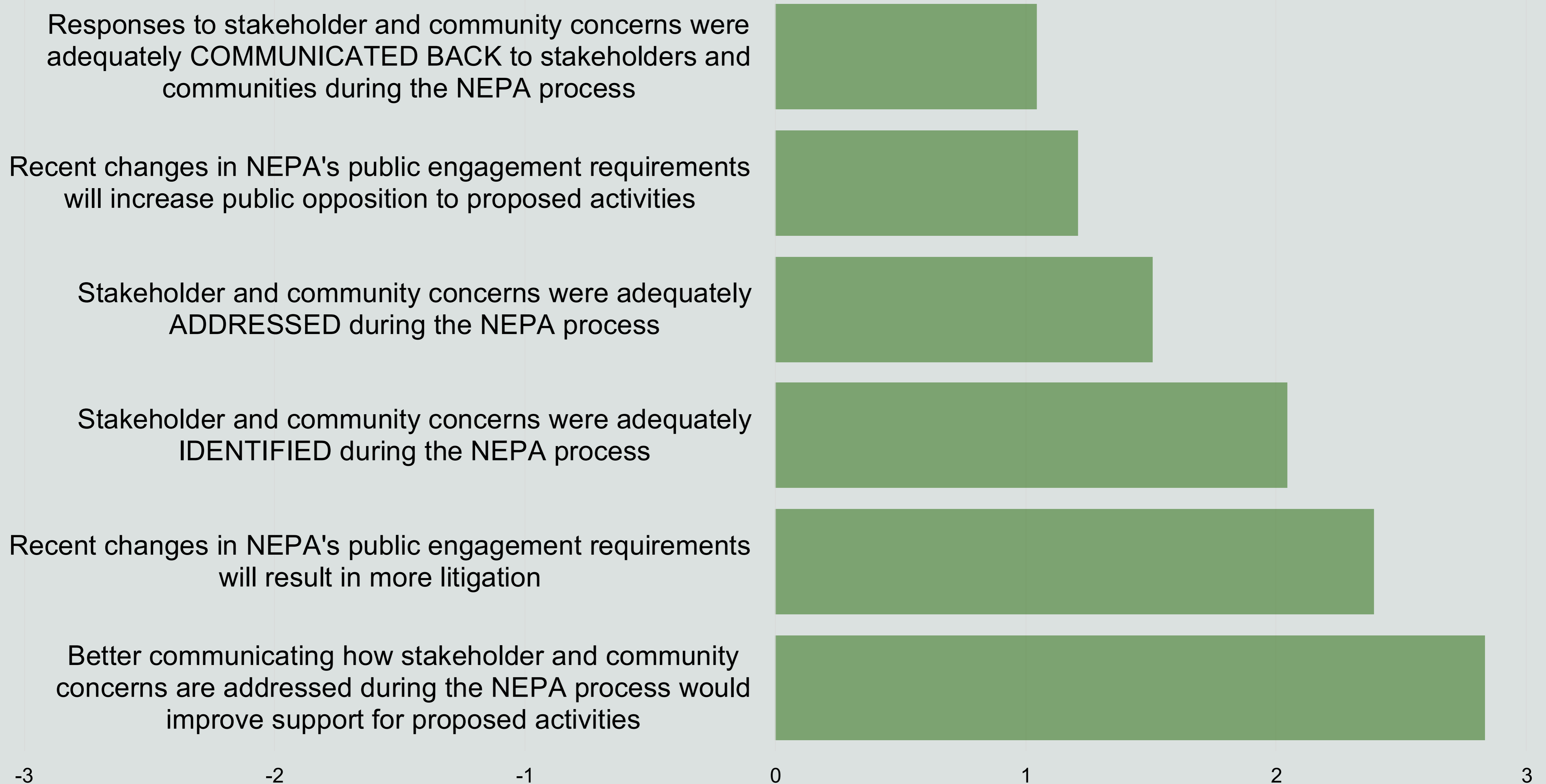
Do you agree or disagree with the following statements about recent CHANGES to NEPA?



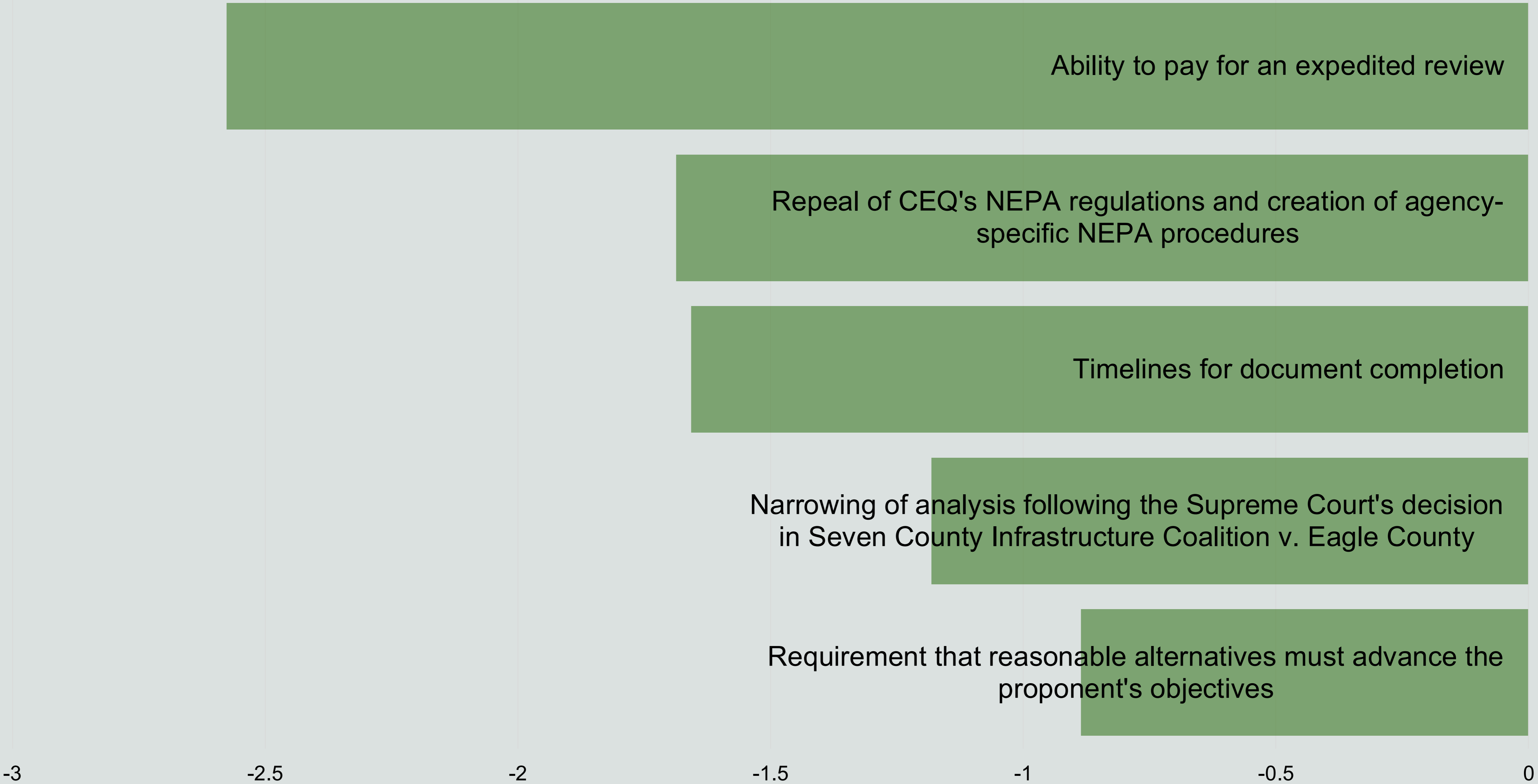
Do you agree or disagree with the following statements about replacement of CEQ's NEPA regulations with agency-specific NEPA procedures?



Do you agree or disagree with the following statements about stakeholder engagement?



To what degree do you expect the following changes will affect the likelihood that NEPA compliance will reduce IMPACTS?



Examples of Impact Reduction (n=45) & Benefits to the Proponent (n=39)

- Lots of great examples. Please share more examples and identify specific projects/documents!
- Consensus around benefits of NEPA compliance *but* considerable discussion about whether reductions resulted from NEPA or statutory requirements contained in other laws (e.g., CWA, ESA, NHPA).
- Responses highlighted the distinction between agency proponents attempting to maximize a public benefit and industry proponents focused on a development activity.

What One Thing Would You Change About NEPA and Why? (n=53)

- Reinstatement of CEQ regulations—shared desire for uniformity.
- More training for agency staff and decisionmakers.
- More and earlier stakeholder engagement.
- Improve coordination across agencies.

An Observation:

- Respondents identified “inadequate or late coordination between agencies with overlapping jurisdiction” as the leading cause of NEPA delays.
- Respondents identified “information provided by NEPA contractors” as the most important factor in accelerating NEPA decisions.
- GAO (16-165) identified the five leading causes of delay in reviewing hardrock mine operating plans as: (1) quality of mine plans, (2) limited agency resources, (3) mid-stream changes to plans, (4) mine complexity, and (5) the quality of contractor work.
- Strengthening coordination and communication may also benefit from increased engagement between agencies and consultants.

I'd Like to Hear More About:

- Anywhere you think my assessment is veering off the rails
- You are willing to share examples of projects where impacts were impacts avoided or mitigated because of the NEPA process.
- You are willing to share examples of projects where the NEPA process produced specific benefits for project proponents.
- Projects where the proposed action was as an alternative eliminated from detailed analysis.
- Specific NEPA reform ideas.

Next Steps:

- Update analysis to include new responses.
- Statistical analysis to see whether responses vary by role (e.g., consultants v. government; scientists v. project managers; senior v. junior respondents).
- More careful assessment of responses to open ended questions.
- Write up of results.

Questions and Comments

To Take the Survey:

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