

**From:** Jan Alexander  
**Date:** April 5, 2013, 1:20:55 PM PDT  
**To:** <[beth.reiley@state.or.us](mailto:beth.reiley@state.or.us)>  
**Subject:** comments on SB476

Dear Madam Chairman and Committee Members:

I am very much opposed to HB476 and am asking you to vote no on this bill.

I see that HB476 (requires state agencies to go through the federal NEPA process and produce EISs for “certain projects”) is schedule for a hearing on April 10, 2013. I have spoken to State agencies, including DOGAMI and DEQ, and they tell me they do not have the staff or budgets to conduct this type of analysis. Further, the State just does not do NEPA documents, this is a federal requirement.

Just one EIS takes many hundreds of thousands of dollars to produce. The state would have to hire specialists, pay them to perform the field studies, do the reports, write the effects sections of the EIS and then put these together in an EIS. In addition, I used to write NEPA documents when I worked for the Forest Service, and I know that the time period for an EIS, from scoping to plan approval, takes many years, and there is no set time period.

Also, on federal lands, most mining projects are approved under less costly Environmental Assessments (EAs) not EISs. EAs are appropriate when environmental effects can be mitigated. The bill states only an EIS will suffice.

The financial consequences to the State would be exorbitant, should this bill pass. In addition, passage of this bill will literally stop all new business applications, at least in the mining world. No mining company would apply for a permit that takes an undetermined number of years to accomplish and is vulnerable to lawsuits, by just about anyone-and “affected” parties do not even have to participate in the contested case hearing.

Please vote no on this bill. It will increase State expenditures, for no good reason, and it will kill jobs. This bill is not good for Oregon. Please enter my comments into the record.

Thank you for your time.

Sincerely,

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