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March 10, 2020

Via: regulations.gov

Council on Environmental Quality
730 Jackson Place NW
Washington, DC 20503

Re: Docket # CEQ-2019-0003; Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act

The National Cotton Council (NCC) is the central organization of the United States cotton industry. Its members include producers, ginner, cottonseed processors and merchandizers, merchants, cooperatives, warehousemen and textile manufacturers. A majority of the industry is concentrated in 17 cotton-producing states stretching from California to Virginia. U.S. cotton producers cultivate between 10 and 14 million acres of cotton with production averaging 12 to 20 million 480-lb bales annually. The downstream manufacturers of cotton apparel and home furnishings are located in virtually every state. Farms and businesses directly involved in the production, distribution and processing of cotton employ more than 125,000 workers and produce direct business revenue of more than \$21 billion. Annual cotton production is valued at more than \$5.5 billion at the farm gate, the point at which the producer markets the crop. Accounting for the ripple effect of cotton through the broader economy, direct and indirect employment surpasses 280,000 workers with economic activity of almost \$75 billion. In addition to the cotton fiber, cottonseed products are used for livestock feed and cottonseed oil is used as an ingredient in food products as well as being a premium cooking oil.

The Council on Environmental Quality (CEQ) is proposing to update its regulations for implementing the procedural provisions of the National Environmental Policy Act (NEPA). CEQ has not comprehensively updated its regulations since their promulgation in 1978, more than four decades ago. This proposed rule would modernize and clarify the regulations to facilitate more efficient, effective, and timely NEPA reviews by Federal agencies in connection with proposals for agency action. The proposed amendments would advance the original goals of the CEQ regulations to reduce paperwork and delays, and promote better decisions consistent with the national environmental policy set forth in section 101 of NEPA. If finalized, the proposed rule would comprehensively update and substantially revise the 1978 regulations.

In the current conditions, NEPA affects "major Federal actions." Based on comments and requests, CEQ is attempting to clarify the definition of a "major Federal action." Where it affects agriculture, CEQ proposes to exclude, as non-major Federal actions, the farm ownership

and operating loan guarantees provided by the Farm Service Agency and the business loan guarantee programs of the Small Business Administration. This would remove the burdensome oversight of NEPA from a process where FSA doesn't control the bank, the borrower, the use of funds nor operates any facilities or takes possession of defaulted properties. We agree with this proposal.

In general, the 1978 NEPA is outdated and in need of revision. While it has had critical successes, it has also become a tool to be used to bludgeon and slow-roll any project with a hint of Federal funds attached to it. We support modernizing this rule.

Regards,

A handwritten signature in cursive script that reads "Steve Hensley". The signature is written in black ink and is positioned below the "Regards," text.

Steve Hensley
National Cotton Council